

Sponsored
Programs
Administration

March 26, 2019

Agenda

- Welcome
- Grant Writer Kit Bonin
- Training Update
- OIG Audit Overview
- NIH Updates
- Raises in July





Grant
Writing

Kit Bonin

Training Updates

- Interactive Training Update
 - Next training – Account Management and Monitoring
 - Introduction to Research Administration at Uconn Health – Fall 2019
 - Multi-day program
 - UCH-specific
 - Intermediate Research Administration Learning Experience – Spring 2020
 - Multi-day program
 - UCH-specific
- CRA Study Group – ongoing study groups – July to October for fall testing – January to April for spring testing
- NIH Book Club – Grants Policy Statement

**If you have input, topic suggestions, questions, or comments
please email brenda.lowther@uchc.edu**

Information and Compliance Form Clarification

NEVER UConn Health

It should be the prime awardee - example: NIH

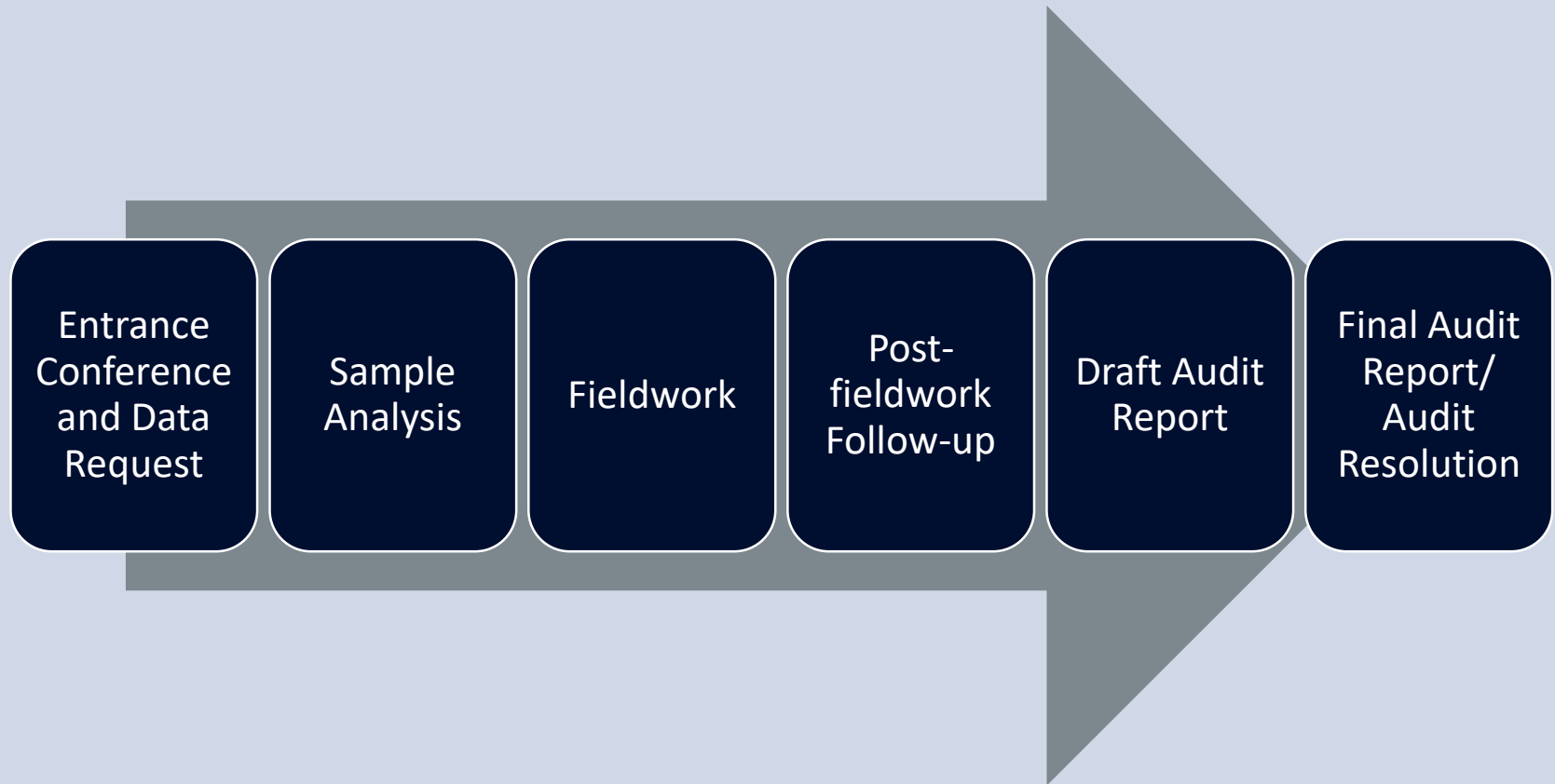


INFORMATION AND COMPLIANCE FORM FOR SUBRECIPIENTS

All subrecipients must complete this form when submitting a proposal to UConn/UConn Health or at the time requested by UConn/UConn Health. This form must be signed and dated by an authorized organizational representative.

GENERAL INFORMATION			
ORIGINATING SPONSOR:	Click here to enter text.		
PROPOSAL TITLE:	Click here to enter text.		
UConn/UConn Health PRINCIPAL INVESTIGATOR (PI):	Click here to enter text.		
SUBRECIPIENT INSTITUTION:	Click here to enter text.		
SUBRECIPIENT PI:	Click here to enter text.	EMAIL:	Click here to enter text.
ADMINISTRATIVE CONTACT:	Click here to enter text.	EMAIL:	Click here to enter text.
PERFORMANCE DATES AND SUBRECIPIENT COSTS			

NSF Data Analytics Audit Lifecycle



NSF Data Analytics Audit

Data analytics audit process starts with a survey phase so the auditors become familiar with the auditees overall grant management environment. Potential steps in this process could include reconcile general ledger information to cash drawdown requests, reviewing policies and procedures, conducting onsite walkthroughs, and tracing transactions through their lifecycles to understand and assess the internal control structure.

Testing is transaction-specific, and is designed to provide an idea about the preliminary audit focus areas:

- Purchases at the end of the Project Period;
- Travel at the end of the Project Period;
- Applied F&A rates;
- Costs with questionable allocation methodologies;
- Late Cost Posting (LDCAs, Cost transfers)

Data request will look for supporting documentation for sampled transactions:

- POs / Requisitions;
- Invoices;
- Effort Reports

Uniform Guidance - Supplies

§ 200.314 Supplies.

See also § 200.453 Materials and supplies costs, including costs of computing devices.

(a) Title to supplies will vest in the non-Federal entity upon acquisition. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other Federal award, the non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal government for its share. The amount of compensation must be computed in the same manner as for equipment.

Uniform Guidance – Materials and Supplies

§ 200.453 Materials and supplies costs, including costs of computing devices.

(a) Costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award are allowable.

(b) Purchased materials and supplies must be charged at their actual prices, net of applicable credits. Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.

(c) Materials and supplies used for the performance of a Federal award may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a Federal award.

Purchasing Card (P-CARD) – Restricted Purchases

Purchases of the restricted items listed below and purchases in excess of \$9,999 or more must continue to be processed in accordance with established procurement and disbursement policies and procedures.

The purchasing card is NOT to be used for the following commodities:

- Alcoholic beverages
- Animals (live)
- Automotive gasoline (except for State Vehicles)
- Business, travel, and entertainment related expenses and advances
- Cash advances of any type
- Catering services where a signed contract is required
- Cellular phones and related monthly charges
- Chemicals
- Clothing
- Computers and Software (any value)
- Construction and Renovation Services
- Consulting Services
- Contract agreements of any type that involve a signature
- Equipment (valued over \$1,000.)
- Food, Beverages consumed at supplier's location
- Furniture of any type
- Gifts/Donations
- Internet Service Providers
- Items prohibited from purchase under grant or research contracts
- Leases & Lease-Purchases or any other time payments
- Moving Services
- Personal use items (i.e. attaches, folios, pen/pencil sets etc.)
- Precious metals
- Prescription drugs and controlled substances
- Printing Services (except Advanced Printing)
- Radioactive and hazardous materials
- Rentals of vehicles
- Reimbursements of any type
- Restricted items defined by the Office of Research Safety
- Signage

Spotlight on Accounts

Use accounts for their designated purpose:

Accounts are designed to ensure charges are appropriate and purchases are made in accordance with UConn Health policies and procedures (both Research and other)

- All purchase requests > \$1,000: Supplies / Purchased Services
- All purchases:

Advertising: 72520

Dues: 72523

Minor Equipment: 75509

Computers: 75521 (under \$1,000)

Grant Equipment: 7630 Pool (To be updated)

Contracts / Subawards: 72511 / 78501 / 78502 / 78503 / 78504 / 78505 / 78506 / 78510

OFFICE OF LOGISTICS & MANAGEMENT

Track controllable assets (items that must be tracked because of its sensitive, portable, and theft-prone nature, even if it does not meet the definition of a capital asset):

Computers, tablets, cameras, any equipment that stores confidential data

Spotlight on Internal Controls

To Ensure Internal Controls are in Place and Operating Effectively, **MONITOR:**

➤ Purchases at the End of a Period

- Review your accounts often and especially in the last quarter of the award;
- Pay attention to items that could be back-ordered (computers, etc.).

➤ Travel at the End of a Period

- Make sure reimbursements are done in a timely manner (Policy is 60 days);
- Make sure travel benefits the terms of the grant.

➤ Costs with Questionable Allocation

- Ensure there is documentation that supports the allocation (does this grant require a new centrifuge?).

Spotlight on Internal Controls

To Ensure Internal Controls are in Place and Operating Effectively, MONITOR:

➤ Late Cost Posting

- Make sure that transfers (including LDCAs) follow Cost Transfer and Payroll Reallocation Policy:
 1. “documentation of how the error occurred and a certification of the correctness of the charge...”
 2. Must be a direct benefit to the award;
 3. Must be reported within 90 days of the calendar quarter in which the costs are incurred;
 4. Are not permitted where the costs have been reported to the agency or the corresponding effort has been certified to by the PI.
 5. In the event that a Cost Transfer is denied, the decision may be appealed to the Associate Vice President for Research, or designee, within 10 business days of the denial.

[2002-07: Cost Transfers and Payroll Reallocations.pdf](#)

NIH Reminder

- Our [Format Attachment](#) guidance on the [How to Apply - Application Guide](#) page has included the same rules for filenames for many years. Filenames used for grant application attachments must be descriptive;
- unique within an application (or within a component of a multi-project application);
- comprised of the following characters: *A-Z, a-z, 0-9, underscore, hyphen, space, period, parenthesis, curly braces, square brackets, tilde, exclamation point, comma, semi colon, apostrophe, at sign, number sign, dollar sign, percent sign, plus sign, and equal sign;* and **50 characters or less (including spaces).**

NIH Reminder

- eRA systems now enforce the 50-character limit for filenames used for attachments in grant applications. As a point of reference ... ***This is 50 characters with spaces and punctuation.*** You can convey a surprising amount of information in 50 characters, but maybe not as much as you want. For example, “consortium-contractual-arrangements-institution-pi-name” is over the limit and its use would result in an error.
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- The new validation will be part of the business rules checked by ASSIST and other solutions that use our validation service pre-submission. If you think you might be pushing the 50-character limit, run a quick *Validate Application* (if using ASSIST), *Preview Grantor Validation* (if using Workspace), or whatever your system-to-system solution calls it and make any necessary adjustments. If the long filename isn't caught prior to submission, you know we'll catch it after submission.

NIH Reminder

- eRA just released an enhancement that allows ASSIST users logged in with SO (Signing Official) or AO (Administrative Official) accounts to unlock a form that was locked by another user. Simply go to the form that is locked and use the “UNLOCK CURRENT FORM” button located in the bottom portion of the left navigation.
- **Use the feature with caution.** Forcing a form to unlock means any data your colleague didn't save will be lost. But, it's nice to know the feature is there - just in case you need it in a pinch.

NIH – Current and Pending

Current and Pending Support Reminder – Don't forget about Other Support

- Information on other active and pending support will be requested as part of the Just-in-Time procedures.
- Other support includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards.
- Training awards, prizes or gifts are not included.
- Other support is requested for all individuals designated in an application as senior/key personnel-those devoting measurable effort to a project.
- Information on Other Support is not specifically requested for Program Directors, training faculty, and other individuals involved in the oversight of training grants since applicable information is collected in other sections of a training grant application. It is also not requested for individuals categorized as Other Significant Contributors.

NIH Current and Pending (cont.)

NIH Review of Other Support

Scientific program and grants management staff will review this information before award to ensure the following:

- Sufficient levels of effort are committed to the project.
- There is no scientific, budgetary, or commitment overlap.
 - Scientific overlap occurs when (1) substantially the same research is proposed in more than one application or is submitted to two or more funding sources for review and funding consideration or (2) a specific research objective and the research design for accomplishing the objective are the same or closely related in two or more applications or awards, regardless of the funding source.
 - Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salaries) are requested in an application but already are provided by another source.
 - Commitment overlap occurs when an individual's time commitment exceeds 100 percent (i.e., 12 person months), whether or not salary support is requested in the application.
 - Overlap, whether scientific, budgetary, or commitment of an individual's effort greater than 100 percent, is not permitted. Any overlap will be resolved by the IC with the applicant and the PD/PI at the time of award.
- Only funds necessary to the approved project are included in the award.

NIH Reminder

Updated NIH Policy for Resubmission of New Investigator R01 Applications

The NIH Center for Scientific Review and National Institute of Mental Health will no longer offer a special deadline for new investigator resubmission applications. This change goes into effect starting with R01 applications submitted for due dates on or after January 25, 2019.

Since 2007 NIH had provided new investigators the option of submitting R01 A1 resubmission applications for consecutive review cycles (“next round resubmission”) thinking it would enable new investigators to potentially resubmit applications more rapidly. The expectation was that the policy would accelerate funding for new investigators. However, this turned out to be incorrect. Utilization of the “next round resubmission” policy is low, and it has not made the impact on age of first R01 or in time to award, so we are discontinuing the policy. For more information, see [NOT-OD-19-053](#).

2-Step Submission Process

eRA Information: New 2-Step Submission Process for RPPRs with Inclusion Enrollment Data

- With the launch of the new Human Subjects System (HSS), there is now a new two-step submission process for any Research Performance Progress Reports (RPPR) reporting inclusion enrollment updates. When investigators are completing their RPPR inclusion enrollment updates, the system will now automatically open a separate screen for enrollment data entry. This requires separate submission steps for the enrollment data file and the full RPPR file. Who's Affected? All principal investigators submitting RPPR files with 2018 inclusion enrollment updates submitted since the June 9, 2018 launch of the Human Subjects System (HSS).
- What's Changed? There is now a two-step submission process for inclusion enrollment data updates made during the RPPR process – one submission via ASSIST for the inclusion data and a separate submission for the full RPPR file.


2-Step Submission Process (cont)


eRA Information: New 2-Step Submission Process for RPPRs with Inclusion Enrollment Data

- Investigators will enter their inclusion enrollment updates via ASSIST in the Human Subjects and Clinical Trial (HSCT) form. When completed, they need to update the ASSIST file status to “Ready for Submission” and route to their Signing Official (SO) for submission prior to the submission of their full RPPR file.
- Once the SO then submits the updated HSCT form, the RPPR can be completed and submitted as usual. Note: If the SO does not submit the ASSIST HSCT updates prior to the RPPR submission, the RPPR file will not reflect the updates made to the inclusion enrollment data. Investigators will receive a warning when trying to submit their RPPR (see screenshot below) but this does not prevent them from submitting.

Figure 1: Warning Message to Remind Signing Official to Submit HSS Enrollment Data

Warning Messages

 G.4.b. No Cumulative inclusion enrollment data has been provided for the Study# 123456. Is this correct? If enrollment has not begun, you may proceed and submit the RPPR. If participants have been enrolled, navigate to section G.4.b of the RPPR to update inclusion enrollment report(s) cumulative enrollment data for these studies. (ID: 206732)

 G.4.b. Updates to Inclusion enrollment report(s) have not been made for study# 654321. If updates are needed, navigate to G.4.b of the RPPR to access this study and update the inclusion reports. (ID: 206732)

Raises in July

- UHP staff are scheduled to receive a contracted wage increase as well as a step increase in July 2019 and again in July 2020. This will average to approximately 6.5% in each of these years. For multi-year proposals, please use this 6.5% increase in the early budget years and a 3% increase for years beginning in July 2021 and thereafter.
- Unionized faculty are scheduled to receive an average increase of approximately 5.5% in July 2019 and again in July 2020. For multi-year proposals, please use this 5.5% increase in the early budget years and a 3% increase for years beginning in July 2021 and thereafter

Next SPA and Questions



Next Meeting:

April 2019

Date to be
Determined

Have a question or topic you would like covered at the SPA Meetings?
Email brenda.lowther@uchc.edu

Upcoming SPA Dates

Date	Time	Location
April 16, 2019	11:00 am - 12:00 pm	ARB Large Conference Room
May 14, 2019	11:00 am - 12:00 pm	TBD
June 18, 2019	11:00 am - 12:00 pm	TBD

