

University of Mississippi

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Research and Sponsored Programs, Office of

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Award Management Roles & Responsibilities

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Award Management Roles & Responsibilities (Acceptance to Closeout)

Anita Randle, Research Administration
Advisor, Post-Award, ORSP

Renita Gray, Manager of Sponsored Programs
Accounting, Accounting and ORSP

Topics for this Session

- Award receipt, review and negotiation
- Award execution and acceptance
- Account set up
- Spending
- Making changes to the award
- Reporting
- Closeout

Award Receipt

- Legal Recipient: University of Mississippi
- Authorized Signatory for UM: Renita Gray, Manager of Sponsored Programs Accounting
- All externally sponsored awards should be forwarded to ORSP for review (before signature(s) are provided).

Award Review

- Award review is a collaboration among:
 - Principal Investigator
 - ORSP Post-Award
 - Departmental Administrator
- Red Flags to watch for:
 - Restrictions on publications
 - Restrictions on foreign nationals
 - Indemnification terms (prohibited by State law)
 - Warranty of work/results (prohibited by State law)
 - Restrictions on UM's intellectual property rights

Award Negotiation

- Award negotiation:
 - Handled by ORSP Post-Award with possible involvement from
 - General Counsel
 - Technology Management
 - Research Integrity and Compliance
 - PI is informed of progress
 - Can take days, weeks or months (depending on sponsor)

Award Acceptance

Happens after award review and negotiations are complete:

- PI signs Notice of Award Memo to indicate his/her acceptance of award
- Note acceptance responsibilities on the next slide
- ORSP obtains any required signatures on award

Office of Research and Sponsored Programs

INTEROFFICE MEMORANDUM

TO: NAME
DEPARTMENT

FROM: Anita Randle
Research Administration Advisor

DATE: February 14, 2018

RE: Notice of Award:
AGENCY
TITLE

I am pleased to notify you that funding has been awarded for your project named above.

Staff in the Office of Research and Sponsored Programs are reviewing this award. Your review and acceptance are essential steps in the award process. Once the award process is complete, the Accounting Office will establish an account for these funds; you will receive notification when a number has been assigned and your account is ready for use.

PLEASE DO THE FOLLOWING:

1. Examine the attached materials. If acceptable, sign below and return this memo to ORSP. Keep a copy for your records.
2. If any of the following are checked, complete the attached form(s) and return to ORSP, along with this signed memo. Confidentiality Export Control CUI Data

I understand that my signature below indicates that:

- I have reviewed the terms and conditions of the award and agree to comply with the applicable sponsor and university requirements.
- I accept responsibility for the technical aspects of the project, including the timely submission of technical reports.
- I agree to submit activity reports and cost sharing details to the Accounting Office, as required.
- I will notify ORSP to initiate any required subcontracts.
- I will notify the Accounting Office to initiate invoicing (when invoicing is based upon completion of tasks).
- I accept responsibility for the fiscal management of the award which includes:
 - reviewing monthly budget statements and/or appropriate SAP Budget Control System Reports to determine that all charges and credits are appropriate, and
 - spending funds within the approved project period and in accordance with (1) the approved budget, (2) the sponsor's guidelines and (3) 2 CFR Part 200, Uniform Administrative Requirements, Subpart E - Cost Principles.

Principal Investigator(s)

Date

Note what the PI commits to in accepting an award:

I understand that my signature below indicates that:

- *I have reviewed the terms and conditions of the award and agree to comply with the applicable sponsor and university requirements.*
- *I accept responsibility for the technical aspects of the project, including the timely submission of technical reports.*
- *I agree to submit activity reports and cost sharing details to the Accounting Office, as required.*
- *I will notify ORSP to initiate any required subcontracts.*
- *I will notify the Accounting Office to initiate invoicing (when invoicing is based upon completion of tasks).*
- *I accept responsibility for the fiscal management of the award which includes:*
 - *reviewing monthly budget statements and/or appropriate SAP Budget Control System Reports to determine that all charges and credits are appropriate, and*
 - *spending funds within the approved project period and in accordance with (1) the approved budget, (2) the sponsor's guidelines and (3) 2 CFR Part 200, Uniform Administrative Requirements, Subpart E - Cost Principles.*

Principal Investigator(s)

Date

Account Setup

- Handled by the Office of Accounting upon receipt of award packet from ORSP.

Account Set Up: What's Needed?

- Fully Executed Award (contains all required signatures)
- Approved Transmittal Sheet/proposal package
- Finalized budgets
 - Detailed Budget (prepared by PI with feedback from pre-award)
 - SAP Budget (automatically generates when proposal is exported by pre-award)
- All Compliance Verifications, where applicable
 - Responsible Conduct of Research Training completion
 - Institutional Review Board (IRB)
 - Institutional Animal Care and Use Committee (IACUC)
- PI's signature on Notice of Award Memo

Account Set Up: Process

- ORSP emails award packet to Accounting
- PI is copied
- Accounting sets up account and notifies PI, (normally takes 5 days for award set up)
 - May get multiple accounts for one project if budget includes:
 - Multiple PIs (across departments/schools)
 - Subawards
 - Participant support
 - Cost sharing
 - Year-to-year funding and carryover is not automatic

Office of Research and Sponsored Programs

INTEROFFICE MEMORANDUM

To: Kathy Harker, Accounting
 FROM: Anita Randle, ORSP
 DATE: February 14, 2019

ACCT NO's:

NOTICE OF FUNDING:

PI Name, PI Department
Co-PIs if applicable, Co-PIs Department if applicable
Granting Agency
Name of Proposal
 Award Total: **\$0.00**

<input type="checkbox"/> NEW AWARD <input type="checkbox"/> SET UP NEW ACCOUNT (INITIAL AWARD) <input type="checkbox"/> PRELIMINARY ACCOUNT ESTABLISHED	<input type="checkbox"/> CONTINUATION FUNDING <input type="checkbox"/> INCREMENTAL FUNDING PREVIOUS ACCOUNT NUMBERS: <input type="checkbox"/> CARRYOVER OF PRIOR FUNDING ALLOWED <input type="checkbox"/> CARRYOVER NOT ALLOWED - (NEW ACCOUNT REQUIRED) <input type="checkbox"/> SEPARATE TASK ORDER/ACRN REPORTING (NEW ACCOUNT REQUIRED)				
BUDGET PERIOD: PROJECT PERIOD: 	PRIME AWARD No. SUBAWARD No. 	CFDA No. 			
AWARD TYPE: <input type="checkbox"/> GRANT <input type="checkbox"/> SUBCONTRACT/SUBAWARD <input type="checkbox"/> CONSORTIUM AGREEMENT <input type="checkbox"/> COOPERATIVE AGREEMENT <input type="checkbox"/> REGRANT <input type="checkbox"/> APPROPRIATION <input type="checkbox"/> CONTRACT <input type="checkbox"/> FELLOWSHIP <input type="checkbox"/> FIXED-PRICE CONTRACT <input type="checkbox"/> TRAINING GRANT	PAYMENT TYPE: <input type="checkbox"/> COST REIMBURSEMENT <input type="checkbox"/> FIXED PRICE				
FUNDING SOURCE: <input type="checkbox"/> FEDERAL <input type="checkbox"/> EDUCATIONAL INSTITUTION <input type="checkbox"/> STATE & LOCAL GOVT. <input type="checkbox"/> BUSINESS/INDUSTRY <input type="checkbox"/> NON-PROFIT ORG. <input type="checkbox"/> FOREIGN ENTITY	F&A RATE: 	BAE: <input type="checkbox"/> TDC <input type="checkbox"/> MTDC <input type="checkbox"/> S&W			
INTEREST EARNED: <input type="checkbox"/> RETURN TO SPONSOR <input type="checkbox"/> RETURN TO PROJECT <input type="checkbox"/> N/A					
SPECIAL CONSIDERATIONS: <input type="checkbox"/> EQUIPMENT AMOUNT APPROVED BY FUNDING AGENCY: <input type="checkbox"/> 01 UM TITLED IMMEDIATELY <input type="checkbox"/> 02 UM TITLED AT AWARD EXPIRATION <input type="checkbox"/> 03 SPONSOR TITLED IMMEDIATELY <input type="checkbox"/> 04 SPONSOR TITLED AT AWARD EXPIRATION <i>(Non-Availability Form / Guidelines for Management of Equipment Attached)</i> <input type="checkbox"/> SUBCONTRACTS <i>(Request to Issue Subcontract Form Attached)</i> <input type="checkbox"/> CONSULTANTS <i>(MAXIMUM DAILY RATE:)</i> <input type="checkbox"/> FOREIGN TRAVEL <i>MUST COMPLY WITH FLY AMERICA ACT</i> <input type="checkbox"/> EXPORT CONTROL REGULATIONS <input type="checkbox"/> RESTRICTIONS ON PUBLICATIONS <input type="checkbox"/> RESTRICTIONS ON FOREIGN NATIONALS					
<input type="checkbox"/> UNIFORM GUIDANCE APPLIES <input type="checkbox"/> COST SHARING DETAILED DOCUMENTATION ATTACHED <input type="checkbox"/> SECURITY REQUIREMENTS (CLASSIFICATION) <input type="checkbox"/> DFARS 252.204-7012 (CYBERSECURITY)					
REPORTING REQUIREMENTS: 					
REPORTS:	TECHNICAL	FISCAL	INVENTION	PROPERTY	OTHER
FREQUENCY					
FINAL DUE DATE					
COMMENTS: 					
cc: PI Name, PI Department Departmental Administrators if applicable Award File					

Spending Funds

- PI uses account number to incur project-related costs
- There are rules and regulations for spending funds...(next slide)

Spending Rules & Regulations

Public Laws &
U.S. Code
(Ex.: P.L. 106-
107)

Program Regulations
(Ex.: 45 CFR 52)

Administrative Regulations
(Ex.: 2 CFR 200)

Sponsor Special Terms & Conditions
(Ex.: NIH Grants Policy Statement)

State of MS Rules & Regulations
(Ex.: Mississippi Procurement Manual)

UM Policy and Procedure
(Ex.: Cost Sharing on Sponsored Projects)

Spending Rules & Regulations

- Spend according to the award budget
- Spend within the approved project period
- Be able to document allowability of expenditures in case of audit
 - Must show how necessary for project completion
- Retain copies of all reports and documents for 5 years minimum, but longer if specified in award documents

Federal Rules

- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award (Uniform Guidance)
- Cost Principles are in Subpart E

General Criteria for Allowable Costs

- Necessary, reasonable and allocable to the project
- Allowed by the sponsor
- Consistently treated
- In accordance with generally accepted accounting principles
- Not be included as a cost/cost sharing of any other Federally financed program
- Adequately documented

Allowable and Unallowable Costs

- See 2 CFR §§200.420-475 for general provisions for selected items of cost
- The purpose and circumstance of the cost generally determine allowability
- PIs have ultimate responsibility for defending all costs charged to their sponsored projects and cost share accounts

Examples of Unallowable Costs

- Fundraising
- Lobbying
- General public relations
- Alcoholic beverages
- Entertainment
- Memberships in social, dining or country clubs
- Gifts
- Business cards

Making Changes to the Award

- Prior written approval from the sponsor normally required for:
 - ❑ Change in scope or objective of the project
 - ❑ Change in PI/PD specified in application/award
 - ❑ Disengagement of PI/PD from the project for >3 months, or 25% reduction in PI/PD time on project
 - ❑ Transfer of participant support funds to other categories
 - ❑ Subawarding or contracting out any work
 - ❑ Fixed price subawards
 - ❑ Changes to approved cost sharing or matching
 - ❑ Need for additional federal funds to complete project
 - ❑ Incur pre-award costs >90 days pre-award
 - ❑ Subsequent No Cost Extension (NCE) or NCE >12 months

Making Changes to the Award

- Prior written approval may be required for:
 - ❑ Carry forward of balances from one year to the next
 - ❑ No-cost extension
 - ❑ Purchase of equipment not in the approved budget
- Award terms and conditions will specify
- General terms may be overridden by a special term or condition
- Not sure? Contact ORSP Post-Award

Prior Approval Form

- For changes to the award that do or may require sponsor prior approval, submit a Prior Approval Form to ORSP, Post-Award
- <http://www.research.olemiss.edu/award-management/forms>

University of Mississippi Prior Approval System for Federal Grants and Agreements

Please use this form when requesting prior approval of modifications to federal grants and agreements.

[SEE NEXT PAGE FOR INFORMATION]

PRINCIPAL INVESTIGATOR: _____	DATE: _____
SPONSORING AGENCY: _____	
PROJECT TITLE: _____	
GRANT NUMBER: _____	UM ACCOUNT NUMBER: _____

APPROVAL REQUESTED FOR: <small>[see page 2 for category numbers and description]</small>	
<input type="checkbox"/> A1 <input type="checkbox"/> A2 <input type="checkbox"/> A3 <input type="checkbox"/> A4 <input type="checkbox"/> A5 <input type="checkbox"/> A6 <input type="checkbox"/> A7 <input type="checkbox"/> A8 <input type="checkbox"/> A9 <input type="checkbox"/> B1 <input type="checkbox"/> B2 <input type="checkbox"/> B3	<input type="checkbox"/> BUDGET REVISION <small>[required for specified budget restrictions, significant re-budgeting, change of scope, new budget category, transfer between budget categories in excess of 10% of total project cost]</small>
<input type="checkbox"/> OTHER: _____	

DESCRIPTION AND JUSTIFICATION: _____

Approval Signatures:

PRINCIPAL INVESTIGATOR: _____	DATE: _____
DEPARTMENT CHAIR: _____	DATE: _____
DEAN/DIVISION HEAD: _____	DATE: _____
VICE CHANCELLOR FOR RESEARCH AND SPONSORED PROGRAMS: _____	DATE: _____
DIRECTOR OF ACCOUNTING: _____	DATE: _____

If request is for pre-award costs, any non-reimbursable expenditures will be covered as follows:

SIGNATURE/S	ACCOUNT NUMBER/S	AMOUNT/S

For ORSP use only:

<input type="checkbox"/> Grant covered by expanded authorities	<input type="checkbox"/> Grant NOT covered by expanded authorities
<input type="checkbox"/> Required notification sent to agency on _____ by _____.	

Requirements for Prior Approval of Modifications to Federal Grants and Agreements

[REQUEST FORM ON FIRST PAGE]

The Office of Research and Sponsored Programs, in coordination with the Accounting Office, should process all requests that require prior approval from the sponsor or are allowed by expanded authorities granted to the University. Prior approval is required for certain programmatic and budgetary revisions to federal grants and agreements. OMB Circular A-110, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education*, establishes the following requirements for nonconstruction projects.

A. WRITTEN PRIOR APPROVAL IS REQUIRED FROM THE FEDERAL AWARDING AGENCY FOR THE FOLLOWING:

- (1) Change in scope or objective of the project (significant rebudgeting may be considered to be a change in scope);
- (2) Change in a key person specified in the application or award document;
- (3) Absence of more than 3 months or reduction of 25% of time devoted by PI;
- (4) Need for additional federal funding;
- (5) Transfer of amount budgeted for indirect costs to absorb increases in direct costs, or vice versa, if approval is required by the federal awarding agency;
- (6) Inclusion, unless waived by the federal awarding agency, of costs that require prior approval in accordance with OMB Circular A-21 (e.g. equipment purchases not included in approved budget);
- (7) Transfer of funds allotted for training allowances (direct payment to trainees) to other categories of expense;
- (8) Unless described in the application and funded in the approved award, the subaward, transfer or contracting out of any work under this award;
- (9) When an award is made for support of both construction and nonconstruction work, the awarding agency may require the recipient to request prior approval before making any budget transfers between the two types of work supported.

With the exceptions of Items (1) and (4), the federal awarding agency may, at its option, waive cost-related and administrative prior approval for any of the above.

B. EXPANDED AUTHORITIES AWARDS:

The grantee institution may, at the option of the federal awarding agency, be granted expanded authorities to authorize certain modifications. (PHS and NSF generally allow grantee institutions this authority, while other agencies may choose not to do so; award notices indicate if award is to be administered under expanded authorities.) Expanded authorities allow the University to:

- (1) Incur pre-award costs 90 calendar days prior to the award or more than 90 calendar days with prior approval.
- (2) Initiate a one-time extension of the expiration date of the award of up to 12 months unless one or more of the following conditions apply:
 - (a) the terms and conditions of the award prohibit the extension;
 - (b) the extension requires additional federal funds;
 - (c) the extension involves any change in the objectives or scope of the project.The recipient (the University) must notify the awarding agency in writing with the supporting reasons and revised expiration date at least 10 days before the expiration date specified in the award. **Extending a project just to spend unobligated balance is not sufficient justification.**
- (3) Carry forward unobligated balances to subsequent funding periods. Agency may require justification for the carry-over of amounts which exceed a certain percentage of the award.

For awards that support research, unless the federal agency provides otherwise in the award or agency regulations, prior approval requirements described in Section (B) are automatically waived unless one of the conditions in (B)(2)(a)-(c) applies.

NOTE: The federal awarding agency may, at its option, restrict the transfer of funds among direct cost categories for awards in which the federal share of the project exceeds \$100,000 and the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget.

All other changes to nonconstruction projects do not normally require prior approval but are subject to the terms and conditions of the award document.

Reporting

- Financial reporting
 - ❑ Handled by Accounting Office
 - ❑ Sometimes requires input from PI/department
 - ❑ Normally quarterly, but no less frequently than annually and no more frequently than monthly
- Program performance reporting
 - ❑ Handled by PI
 - ❑ No less frequently than annually; no more frequently than quarterly, except in unusual circumstances

Reporting

- Patent reporting
 - Handled by PI and Office of Technology Commercialization
 - Post-Award may prepare a negative report for PI, if requested
- Property reporting
 - Handled by PI and ORSP

Closeout

- Closeout reports are usually due to the sponsor within 90-120 days after project period end date
- Final Performance Report
 - Prepared & submitted by PI, copy to ORSP Post-Award
- Final Financial Report
 - Prepared & submitted by Accounting Office
- Final Patent Report
 - Prepared & submitted by PI (if negative) or Office of Technology Commercialization (if patents to report), copy to ORSP Post-Award

Resources

ORSP Post-Award Office

Anita Randle arandle@olemiss.edu x6524 313 Barr Hall
(Cell – 662-801-1837)

Christy White ccwhite@olemiss.edu x1710 317 Barr Hall

Accounting Office

Central email accounting@olemiss.edu x6538 113 Falkner

Renita Gray rlgray1@olemiss.edu x2482 109 Falkner
(Cell – 870-219-6342)

myOleMiss - Analytics

<http://www.olemiss.edu>

ORSP Post-Award Forms

<http://www.research.olemiss.edu/award-management/forms>

2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)

http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl