Agenda

• Pre-Award Updates
  – Agency news and reminders
  – OSR news and reminders

• Let’s Talk Uniform Guidance

• Reengineering the Closeout Process

• ConnectCarolina Updates
  – Multi year awards
  – Project end date and Commitment Control end date
  – Sponsor Invoicing
  – Department Mapping
  – Fund Authority

• Audit Updates
  – Health and Human Services
  – A-133 Research & Development
Grants.gov Enhancement

Is your PI tired of being known as Dr. Pena, when he/she is really Dr. Peña? Want to use β in your project title instead of typing out “beta”? It’s about time to get real – real names, real symbols, real system support!

Over the Presidents Day weekend *(Saturday, February 14, 2015 at 12:01 AM ET to Tuesday, February 17, 2015 at 6:00 AM ET)* Grants.gov will be down to undergo a database update to support the expanded Unicode characters in both free-text form fields and attachments (NOT-OD-15-058).

Remember - eRA systems validate information contained in an application against information contained in eRA Commons institutional and personal profiles (e.g., PD/PI names, organization names). *Make sure your application and eRA Commons information is consistent.*

*Changes to eRA Commons profiles to include Unicode characters should be made on/after February 12, 2015.*
Grants.gov Enhancement (cont’d)

As always, remind your PI’s to carefully check their assembled application image in eRA Commons to ensure all data provided is rendered in the application image correctly.

Changes to organization name or PD/PI name may impact the results of searches in some systems. For example, if you are searching in eRA Commons using the last name 'Peña' you may also need to search under 'Pena' to find all records.

Adjustments to NIH and AHRQ Grant Application Due Dates

As a result of the Grants.gov outage, NIH and AHRQ grant application due dates that fall on or between February 13 and February 18, 2015 will move to February 19, 2015.

Effective January 26, 2015, FastLane began running an additional 24 automated compliance checks on proposals to ensure they comply with requirements outlined in the PAPPG, Chapter II.C.2 of the Grants Proposal Guide (GPG).

These checks will validate a proposal for compliance with page count, proposal sections per type of funding mechanism and budget related rules for proposals submitted in response to the GPG, Program Announcements and Program Descriptions.

At this time, these checks will not be enforced for proposals submitted in response to Program Solicitations.
NSF Automated Proposal Compliance Check – Effective January 26, 2015

The checks detailed above will be triggered when the “Check Proposal,” “Forward to SPO,” or “Submit Proposal” functions are selected by a proposer or proposing organization.

Depending on the rule being checked, a warning or error message will display when a proposal is found to be non-compliant. If an error message appears, the organization will not be able to submit the proposal until it is compliant.

A detailed list of all compliance checks, can be found at:
Subrecipient Documentation

Documents needed for all new and competitive submissions (including foundations and industry-sponsored)

• Statement of work
• Letter of Intent signed by subrecipient’s authorized official, sample Subcontractor Commitment Letter (outgoing) is provided on OSR’s website- http://research.unc.edu/offices/sponsored-research/forms/
• Budget and Budget Justification
• Subrecipient’s Federally Negotiated Rate Agreement
Subrecipient Documentation

Documents needed for non-competing continuation applications. (including foundations and industry-sponsored)

• LOI or PHS 2590
• Budget
• Budget Justification
• Statement of Work
• NIH All Personnel Page (if applicable)
• IRB/IACUC Approvals (if applicable)
• Other Support (if applicable)
F & A Exceptions/Waivers

• The University’s Facilities and Administrative (F&A) policy states that all grants, contracts, and other sponsored agreements accepted by the University will be charged the maximum allowable federally negotiated F&A cost rate.

• For non-profit organizations and some federal programs, the University will accept published policies that limit indirect costs. These published policies must accompany the RAMSeS proposal.

• The University will not accept a corporate/for-profit company’s published policies because a subsidy of any cost of the project would constitute a use of public funds for private benefit and would be an improper use of university resources.

A decision tree is provided on our website that illustrates whether an F&A exception/reduction form is needed.

The F&A Waiver forms have been updated and are now PDF fillable.
Do I need to request a Facilities and Administrative (F&A) Waiver?

Is the sponsor a governmental or non-profit agency?

Yes → Is the F&A limitation published in the guidelines or their website? Has the sponsor’s policy letter been accepted by OSR?

No → Complete F&A Reduction Request: Form 2 and upload in RAMSeS

Is this proposal a SBIR/STTR Phase 1?

Yes → Complete F&A Reduction Request: Form 1 and upload in RAMSeS

No → No F&A Waiver Request form required.
When requesting an F&A waiver for corporate/for-profit funding (Form 1), the policy and form require that the requesting department/center/institute fund the difference in F&A provided and the amount the University would receive if the standard F&A rate were used. An appropriate account number must be included on the form.

Exception to the F&A policy for corporate/for-profit funding is Phase I SBIR/STTRs. If the University is asked to be a subcontractor on a Phase I SBIR/STTR, then the F&A is automatically waived to 0% for these projects only.
Form 2 must include a clear and complete explanation as to why the proposed project costs should be subsidized by the University through the granting of a reduction of F&A. Examples include, the project supports community engagement, or the nature of the work involved does not place a burden on the infrastructure of the university.
Pre- Proposals

• A **pre-proposal** typically establishes communication between the sponsor and the applicant to determine whether a full proposal should be submitted and to obtain advice that will improve the proposal's chance of success.

• In some instances a **pre-proposal** or **letter of intent (LOI)** may be solicited by a funding agency, the specifics of which are normally outlined in the program announcement.

• Typically a pre-proposal involves a brief summary of the project and an estimated budget total.

* How do I know if my PI’s pre-proposal should be entered into RAMSeS for review by OSR or SPO?
University Authorized Pre-Proposals

Any document or electronic submission that requires any of the following must receive University review and approvals through RAMSeS prior to submission to the sponsor:

1. Specific budget detailed figures
2. Commits the University to cost sharing of any kind
3. Limits the number of pre-proposals the University can submit.
4. Requires a University authorized signature.

**Note:** even if the pre-proposal only provides a cost share estimate or bottom line figure, an OSR budget spreadsheet must accompany the proposal routing in RAMSEs and approvals received from the department/center/and/or college providing the cost share.

These types of authorized pre-proposals require approvals via RAMSES, to the Office of Sponsored Programs for review and approval prior to leaving the University.

*All Grants.gov pre-proposals must be submitted by OSR or SPO.*
University Unauthorized Pre-Proposals

Pre-proposals may, however, be sent to potential sponsors without prior review or approvals only under the following conditions:

1. No itemized budget is provided; however, it is acceptable to discuss approximate needs of the project (i.e., graduate support, faculty time, equipment needs, etc.). An estimated total cost as a lump-sum figure can be provided. It should be clear to the potential sponsor that the amount quoted is only an estimate and should in no way be considered a firm quote, and

2. No University resources are being committed, i.e., personnel, facilities, etc., and

3. There is no limit to the number of pre-proposals per University, and

4. Does not require a University authorized signature.

Unauthorized pre-proposal submissions should be a notification of interest to submit a full proposal at a later date on behalf of the University.
Limited Submissions

There are 2 types of limited submissions:
• Limited submission grants
• Limited submission awards

What is a limited submission grant?

A limited submission grant is given to an individual or a team to fund a particular project or body of work. Agencies accept a limited number of proposals from each institution and the University must determine which proposals are submitted. Applications are submitted to the ORD, which coordinates the University’s formal submission to the grant agency. Regina Bartalone can be contacted for questions @ Regina_Bartolone@unc.edu
Limited Submissions (cont’d)

What is a limited submission award?

A **limited submission award** is given to an individual as an acknowledgment of their academic or professional achievement. Awards are nominated by a department chair, dean or program head. These awards frequently target junior faculty who have demonstrated significant contributions early in their careers. **Beginning December 15, 2014, the Center for Faculty Excellence (CFE), now handles the Awards portion of the Limited Submissions program.** Sohini Sengupta ([sengups@unc.edu](mailto:sengups@unc.edu)) is the coordinator.

Additional information can be found on the Office of Research Development website -[http://research.unc.edu/offices/research-development/](http://research.unc.edu/offices/research-development/)
Limited Submissions (cont’d)

List of awards CFE handles includes but is not limited to the following:

- Searle Scholars Award
- Pew Scholar Award in the Biomedical Sciences
- Burroughs Wellcome Investigators in the Pathogenesis of Infectious Disease (PATH)
- Brain Research Foundation – Scientific Innovation Award
- American Diabetes Association – Pathway to Stop Diabetes
- Mellon Foundation – New Directions Fellowships
- Simons Foundation - Investigators in the Mathematical Modeling of Living Systems
- Rita Allen Foundation Scholars Award
- Packard Fellowships in Science and Engineering
- Greenwall Foundation – Faculty Scholars Program in Bioethics
- Microsoft Corporation – Microsoft Research Faculty Fellowship Program
- Dreyfus Foundation Teacher-Scholar Award
- Blavatnik Family Foundation – Blavatnik Awards for Young Scientists
Internal Deadlines for Proposal Submissions to University Offices

5 business days prior to sponsor deadline:
• Administrative components*, DRAFT technical components* of proposal, routed in RAMSeS with completed IPF* are due to appropriate central office (OSR or SPO).

2 business days prior to sponsor deadline:
• Final application package, including final technical components* are due to appropriate central office (OSR or SPO).

* See detailed checklist and notes provided with the revised SOP:
http://research.unc.edu/files/2014/05/SOP-Internal-Deadlines-FINAL-5-7-2014.pdf
Let’s Talk Uniform Guidance

• Implementation – January OSR Newsletter
• Top 10 Things You Need to Know
• Uniform Guidance Website – COMING Next Week!
• Costing Decisions:
  – Clerical and Administrative Salary
  – Computing Devices
  – Short Term Employment Visas
  – Publication Costs (Page Charges) – After term date of project
• Prior Approval Requirements
• Subaward vs. Contractor (Procurement)
Closeouts – Reengineering the Process

- Looking Toward Advance Notification in lieu of NOTR
- Convened a focus group – OSR and campus representatives
- Discussions were positive in realizing reduction in administrative burdens
- Working on the standard notifications to be sent at 90, 30 and 1 day after project termination date
- More testing to do
- Enhancing InfoPorte reporting tools to assist with reconciliation of costs on projects
- Will reconvene the focus group
- Working on a communication plan
- Time Frame: March – April 2015
ConnectCarolina Grants Update
ConnectCarolina Grants Update

• Multi year awards
  – Current configuration causes restriction on spending when the current budget period ends
  – Working group formed to evaluate short term solution for projects meeting certain criteria
  – Long term solution will require configuration changes to potentially reflect multiple budget periods
  – Have reached out to other universities to assess best practices
ConnectCarolina Grants Update

• Project end date
  – Currently represents the current authorized budget period

• KK (commitment control) end date
  – Allows for non personnel expenses incurred during the project period to post after the project end date has expired
  – Set for 75 days past the project end date
ConnectCarolina Grants Update

• Both dates are reflected on the grants profile page in InfoPorte

• If you think the project or KK dates are incorrect contact your assigned OSR Program Administrator in lieu of entering a remedy ticket with the help desk
ConnectCarolina Grants Update

• Sponsor invoicing
  – Working through billing data conversion; moved from manual to automated system
  – Letter of credit drawdown process is up and running
    • Approximately $164m drawn to date
  – Making progress with invoicing
    • Aggregating several months of costs into one invoice when allowed by sponsors
    • Providing additional training to financial reporting staff
  – Refer all urgent sponsor requests to Sharon Brooks or Jenifer Gwaltney in OSR
ConnectCarolina Grants Update

• Department mapping
  – Issues identified with the department associated with a subset of projects during conversion
  – Reaching out to MOU leads to confirm correct department
  – OSR meeting with consultants and ITS personnel within the next two weeks to confirm touch points and develop a sustainable plan for correcting
ConnectCarolina Grants Update

• Fund Authority
  – Working on process for notifying campus of updates to dates and additional funding on existing projects
  – Draft fund authority has been created
  – Working with ITS reporting team to finalize additional fields that need to be added
AUDIT UPDATES
HHS Audit Update

• Findings
  – Cost not adequately documented
  – Costs not reasonable
  – Costs not treated consistently

• HHS Recommendations
  – Enhance oversight of charges to federal awards to ensure consistent compliance with federal requirements
  – Update policies and provide training
HHS Audit Update

• Cost not adequately documented
  – Update to OSR Policy 500.20 – Cost Transfer Policy (*coming soon*)
  – Implementation of standard cost transfer form with reason codes (*coming soon*)

• Costs not reasonable
  – Cost allocation guidance posted to OSR website
  – Topic covered during November 2014 quarterly forum

• Costs not treated consistently
  – Update to OSR Policy 500.16 Cost Accounting Standards Exemptions (*coming soon*)
A133 R&D Audit Update

• State auditors performed follow up of FY2013 audit findings
  – Cleared of all three findings
• One reportable audit finding for FY2014
  – Timeliness of effort certification
• Recommendation
  – The University should strengthen controls over effort certifications to ensure they are completed and approved in a timely manner
A133 R&D Audit Update

- Exit conference held February 6, 2015
  - State Auditor, Internal Audit, BOT audit committee member, VC for Research, OUC, OSR
- Corrective action response due by February 20, 2015
  - OSR will be reviewing potential update of effort reporting policy and procedures
  - Identification of training opportunities