HOT TOPICS

OFFICE OF GRANTS AND CONTRACTS

AUGUST 2020

University of Colorado
Denver | Anschutz Medical Campus

TOPICS OF DISCUSSION

- **Post Award Reports**

- **Billing Automation initiative**

- **Post Award Start to Finish Pilot**

- **NEW Routing Process Check-in**

- **F&A Provisional Rate**

- **OMB Circular Update**

- **COVID 19 Update**

- **New Routing Question**

- **Questions**

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Post Award Reports

Post Award currently bursts a number reports related to closeout of a project.

*In order to make sure someone is receiving these reports it is very important departments maintain roles on projects when there is turnover. Note each dept may have a different way to structure these roles. Departments that need additional people to get these reports should set outlook rules to forward as needed.

Currently we burst:

Projects that are coming to an end.

Projects that have recently ended.

Projects that are being reported.

Payroll Suspense

Coming in the Future:

Snapshot of all Active Projects 2018 and later

Overspending Notices

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Post Award Reports

GM01 Report

Report generated to show projects approaching 90, 60 and 30 days before the budget end date. This is the time to perform last reviews of projects and complete any cost transfers necessary including PETS and JE's.

Recipients of the report:

- GACT=Postaward Administrator
- GADM=Department Administrator
- Fiscal Staff=Department Administrator

Frequency: Monthly

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Post Award Reports

GM02 and GM03 Report

Report generated to show projects that are expired 30, 60 and 90 days after the budget end date. During this time we should all be working together to finalize billing and reporting on the project.

Recipients of the report:

- GACT=Postaward Administrator

- GADM=Department Administrator

- Fiscal Staff=Department Administrator/Department Fiscal Administrator (DFA)

Frequency: Monthly

GM04 Report

Shows all active projects with balances 2018 and greater -coming soon

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Post Award Reports

Payroll Suspense Report

Report generated to show payroll that will hit suspense by department node

<u>Recipients of the report:</u>

- PPL=Payroll Liaison

- GADM=Department Administrator (if PPL is not available, the GADM will get the report)

Frequency: Monthly

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Billing Automation Initiative

OGC is excited to announce new billing automation features that enables us to streamline many of our invoices.

This is a multi- campus initiative, which is being completed in Phases.

We have recently completed Phase 1 and 2 of this project with our UIS Peoplesoft Grants Team and other campus partners.

Phase one and two included technical development, the ability for PS to email invoice without any additional requirements or attachments, and sponsor address and contact cleanup and entry.

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Billing Automation Initiative

- Leverages functionality within PeopleSoft to expedite invoice submission, where sponsor allows for invoicing via email.

- Contracts team working to get more sponsors to agree to this method of billing.

- Sponsor contacts are created and associated with each project's bill plan. Can contain multiple emails within a 74 character limit.

- As invoice is processed, system generates email to sponsor with pdf invoice attached without manual steps.

- Saves time to allows Billing Specialists to focus on more time intensive tasks.

- Billing Specialist and OGC.Billing@ucdenver.edu inbox are copied

- Can easily identify Billing Automation submissions from other invoices.

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Billing Automation Initiative

- Still to come in future phases.
  - Ability to include transactions detail report.
  - Ability to attach additional backup
  - Ability for departments to access copies of invoices.
- What can departments do to help up increase the number of invoices eligible for this automation?
  - Request contracts include an email address for invoice submission.
  - Try to request our invoicing process and template rather than an external form when entering into new agreements.

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Post Award Pilot

Award Life Cycle

A Start to Finish approach for the post award management of awards.

- The Pilot began on 2/1/2020 and consists of 5 OGC team members and a group of Department Partners.

- Pilot will run for a full year to evaluate and improve the structure. As the year comes to an end we will engage with our department partners to share experiences in a future team talks.

- The Pilot will be testing out a start to finish life cycle approach and will bring together team members from Setups, Post Award and Billing.

- Today, we manage Awards/Contracts by dividing post award management tasks across various sections within the Office of Grants and Contracts.
    - Our experience with this flow is it can create a disconnect as our teams are working is silos as awards transition from one budget period to the next.

- Under the new structure we are piloting we are creating a small team of 2 OGC post award staff that will perform the currently divided functions for their assigned departments.

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Post Award Pilot
Award Life Cycle

Benefits we are seeing in this Pilot Structure

- We are able to engage with customers during and about any stage of their award without sending them to other post award sections.

- We are able to do steps in logical order, rather than having separate teams doing tasks at separate points in time, i.e. create connection between tasks.

- Streamline the tasks that take place as a current budget period comes to an end and we need to transition to a new project.

- Create Smoother transitions with our departments when OGC has internal turnover and vacancies, or extended leave by creating a team that is familiar with the project.

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NEW Routing Process Check-in

- New process was implemented 7/1/2020 for all continuation routing type or amendments/modifications to existing awards/contracts.

- Changes to Formstack since implementation
  - Added Submission Due date to RPPR selections
  - Added a choice for mid projects SOI or LOI to follow same path as RPPR
  - Added Sponsor Email for forms directed to CRAO

- Note when agreement for review comes directly to OGC prior to formstack being completed OGC will forward to department to complete formstack, this is needed for review and tracking purposes.

- Process seems to be going well based on number of questions and issues encountered.

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F&A Provisional Rate

SECTION I: Facilities And Administrative Cost Rates

RATE TYPES: FIXED   FINAL   PROV. (PROVISIONAL)   PRED. (PREDETERMINED)

EFFECTIVE PERIOD

TYPE	FROM	TO	RATE(%)	LOCATION	APPLICABLE TO
PRED.	07/01/2016	06/30/2020	55.50	On-Campus	Organized Research
PRED.	07/01/2016	06/30/2020	26.00	Off-Campus	Organized Research
PRED.	07/01/2016	06/30/2020	42.00	On-Campus	Instruction
PRED.	07/01/2016	06/30/2020	26.00	Off-Campus	Instruction
PRED.	07/01/2016	06/30/2020	26.00	All	Other Sponsored Activities
PROV.	07/01/2020	Until Amended		(A)	

(A) Use same rates and conditions as those cited for fiscal year ending June 30, 2020.

- We are currently in Provisional Rate Status until a new Rate Agreement is issued.
- Our campus has submitted for review.
- We do not have an estimated date for when our submitted F&A proposal will be reviewed.

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OMB UPDATES

Amendments to 2 CFR 200 and Changes to COVID-19 Flexibilities

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OMB AMENDS 2 CFR 200

- Issued August 13

- Mostly clarifying and technical corrections

  » Goal 1 – Support Implementation of the President's Management Agenda (PMA) and Administration Priorities

  » Goal 2 – Meeting Statutory Requirements and Aligning 2 CFR 200 with other Requirements

  » Goal 3 – Clarifying Requirements Regarding Areas of Misinterpretation

- Effective Date

  » November 12 for most provisions

  » 2 provisions (termination and procurement of electronics) effective immediately

  » Continue to follow your award terms and conditions

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Provisions Now in Effect

- New – 2 CFR 200.216 Prohibition of Certain Telecommunications and Video Surveillance Services or Equipment

  » Cannot use federal funds to procure or obtain telecommunication equipment produced by Huawei Technologies or ZTE Corporation (or any subsidiary or affiliate of such entities)

  » Cannot extend any service contract

  » Must verify subrecipients are in compliance

- Revised - 2 CFR 200.340 Termination

  » Enables awarding agencies and pass-through entities to terminate an award that "no longer effectuates the program goals or agency priorities."

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Other Provisions – Recipient Performance

- New 2 CFR 200.202 Program Planning and Design
  - » Enhances the federal government's use of performance measurements
  - » Requires agencies to measure project performance based on program's goals and objectives
  - » Provisions incorporated throughout amendments
    - Performance measures and goals identified in the NOFO
    - Performance reports highlight progress towards meeting goals
    - Awards should be terminated for failing to meet performance goals
    - Agencies should make awards based on applicant's ability to meet performance goals
  - » Impact to research awards probably limited
    - 2 CFR 200.329 and Performance Goal definition specifically states that the requirements for research awards "may be limited" to submitting technical performance reports

Closeout

- All awards provided 120 day close out
    - » Subrecipient must closeout in 90 days
    - » No guidance yet from NIH
- All agencies will have unilateral closeout ability
- Failure to meet closeout responsibilities will result in a FAPIIS report, potentially affecting future funding decisions

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Resources

- Performance.gov

- OMB Presentation on August 27

- Compliance Update Course – November 16
  - » Register in Skillsoft

OMB QUESTIONS

Shane.Jernigan@cuanschutz.edu

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COVID-19 Flexibilities

- OMB provided administrative and fiscal flexibilities for grants management

  » M-20-11 (Issued March 9 – Expired July 26)

  » M-20-17 (Issued March 19 – Expired June 16)

  » M-20-20 (Issued April 9 – Expired June 16)

  » M-20-26 (Issued June 18 – Expires September 30)

- Very unlikely OMB will grant further flexibilities after September 30

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Current Flexibilities Under M-20-26

- Flexibilities that expire September 30
  - » Allowability of Salaries and Other Project Activities
  - » Extension of Single Audit Submission (not applicable to administrative units)
- All other flexibilities have expired
- Agencies may provide flexibilities in the pre-award stage
  - » Verify any pre-award flexibilities in the notice of funding opportunity

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Allowability of Salaries and Other Project Activities

Awarding agencies may allow recipients to continue to charge salaries and benefits to active Federal awards consistent with the recipients' policy of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. Awarding agencies may allow other costs to be charged to Federal awards necessary to resume activities supported by the award, consistent with applicable Federal cost principles and the benefit to the project. Awarding agencies may also evaluate the grantee's ability to resume the project activity in the future and the appropriateness of future funding, as done under normal circumstances—based on subsequent progress reports and other communications with the grantee. Under this flexibility, payroll costs paid with the Paycheck Protection Program (PPP) loans or any other Federal CARES Act programs must not be also charged to current Federal awards as it would result in the Federal government paying for the same expenditures twice. Awarding agencies must require recipients to maintain appropriate records and cost documentation as required by 2 CFR § 200.302 – *Financial management* and 2 CFR § 200.333 - *Retention requirement of records* to substantiate the charging of any salaries and other project activities costs related to interruption of operations or services. Due to the limited funding resources under each federal award to achieve its specific public program goals, awarding agencies must inform recipients to exhaust other available funding sources to sustain its workforce and implement necessary steps to save overall operational costs (such as rent renegotiations) during this pandemic period in order to preserve Federal funds for the ramp-up effort. Recipients should retain documentation of their efforts to exhaust other funding sources and reduce overall operational costs.

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Allowability of Salaries and Other Project Activities

- OMB added language in M-20-26 that specifically states that recipients must "exhaust other available funding sources to sustain its workforce and implement necessary steps to save overall operational costs."

- OMB and agencies have not provided guidance

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Implementation for the University of Colorado

- Monitoring COGR for further guidance / talked to our Federal Relations

    » Appears no further guidance from Federal Sponsors will occur

- Monitoring other Universities –

    » Some are silent at this time on their websites

    » Others have come out indicating that "idle" time cannot be charged to sponsored projects includes Boulder campus.

- As Schools/Departments are handling budget issues/furloughs, we also do not see options to continue to charge "idle time" to federal funds with the new requirements.

- We will reach out to those that charged "idle time" during June – August on federal grants to transfer off the federal funds and resolve.

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OGC COVID UPDATE

- During work from home, ALL OGC STAFF are fully functional – all meetings and check in should occur as planned and are conducted via Zoom, Teams, or phone.

- Checks that have been received on campus continue to be processed on a weekly basis (Monday's)

- We are seeing a few associations and foundations end projects early or reduce funding.

  - If your department received notice of early completion or reduction in funding please forward these to xenia as you would any other incoming award.

New Routing Question?

QUESTIONS