

RESEARCH ADMINISTRATION FORUM

Non-Financial Post-Award Management

Objectives

- Understand non-financial post award.
- Understand the role of Research Support Services in the post-award phase of the project.
- Understand the Investigator's post-award responsibilities.

What is Non-Financial Post Award

- Non-financial post-award means exactly what it states, all things non-financial. A few examples are:
 - Process award notice for release to Grants & Contracts Accounting
 - Interpreting terms and conditions of the award notice
 - Requesting prior approvals from the sponsoring agency
 - Follow-up on overdue progress reports to the sponsor
 - Transfer of grants from or to another university
 - Consulting with faculty about their effort allocations
- Research Support Services and Grants & Contracts Accounting share responsibility for non-financial post award administration.
- The focus of this session is mainly on those activities provided by Research Support Services.

Processing Award Notice

- Post-award begins the moment an award is received.
- The award document must be reviewed to ascertain its terms and conditions, with respect to requirements for both financial management and nonfinancial management.
- Research Support Services will contact the Principal Investigator when the awarded amount differs from the amount requested in the proposal.
- Identifying any special terms and conditions at the outset and communicating those requirements is critical to assure appropriate management of the award.

Processing Award Notice (cont.)

- Research Support Services provides an internal notification of the award to the Principal Investigator and their Department representative when the award is released to Grants & Contracts Accounting.
- It is the responsibility of the Principal Investigator to review and understand all special terms and conditions of the award. For example:
 - How will payments be made?
 - Who is responsible for providing milestone information for invoicing, when necessary?
 - Does the project have a non-disclosure agreement?
 - Are there export control restrictions on the project?
 - Are there cost share requirements?

General Federal Award Information

Required Elements under the Uniform Guide §200.210(a) Information contained in a Federal Award:

- Recipient name
- Recipient DUNS number
- Unique Federal Award Identification Number (FAIN)
- Federal Award Date
- Period of Performance Start and End Date
- Amount of Federal Funds Obligated by this action
- Total Amount of Federal Funds Obligated
- Total Amount of the Federal Award
- Budget Approved by the Federal Awarding Agency
- Total Approved Cost Sharing or Matching, where applicable
- Federal award project description
- Name of Federal awarding agency and contact information for awarding official
- CFDA Number and Name
- Identification of whether or not the award is R&D
- Indirect cost rate for the Federal award.

General Terms and Conditions (Federal)

Required Elements under the Uniform Guide §200.210(b)
Information contained in a Federal Award:

- Policy requirements (can be by reference to a website)
- Any additional requirements must be communicated to the non-federal entity
- Federal award performance goals

Non-Federal Award Notice

- Award notices take many forms. Some examples include:
 - Letter of award
 - Formal contract (often associated with a letter of award)
 - Purchase order
 - Sometime we get a check (not our preferred method, but we'll take it).
- It is important that we have a document that authorizes the University of Memphis to invoice the sponsor and that they are obligated to pay us.
- Any other document (i.e., intent to commit) will require an advance account where the department and college have agreed to assume financial responsibility for the project in the event an award notice does not come to fruition.

Prior Approvals

§200.308 Revision of budget and program plans

- For non-construction Federal awards, recipients must request prior approvals from Federal awarding agencies for one or more of the following program or budget-related reasons:
 - Change in scope or the objective of the project or program.
 - Change in key person specified in the application or the Federal award.
 - The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
 - The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval.
 - The transfer of funds budgeted for participant support costs as defined in §200.75 Participant support costs to other categories of expense.
 - The subawarding, transferring or contracting out of any work under a Federal award that is not previously disclosed in the proposal.
 - Changes in the amount of approved cost-sharing or matching.

Expanded Authority

Expanded authorities are the operating **authorities** provided to grantees under certain research grant mechanisms that waive the normally-required sponsor prior approval for specific actions.

- The award notice will normally state whether or not the project is under expanded authorities.
- §200.308(d) Except for requirements listed in paragraph (c)(1) of this section, the Federal awarding agency are authorized, at their option, to waive prior written approvals required by paragraph (c) this section.

Expanded Authorities

1. Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award.
2. Initiate a one-time extension of the period of performance by up to 12 months, except where:
 - i. The terms and conditions of the award prohibit the extension.
 - ii. The extension requires additional funds.
 - iii. The extension involves any change in the approved scope of work.
3. Carry forward unobligated balances to subsequent periods of performance.

Note: A one-time extension may not be exercised merely for the purpose of using unobligated balances.

Expanded Authorities

- §200.308(d)(4) For Federal awards that support research, unless the Federal awarding agency provides otherwise in the Federal Award or in the Federal awarding agency's regulations, the prior approval requirements described in paragraph (d) are automatically waived (i.e., recipients need not obtain such prior approvals) unless one of the conditions included in paragraph (d)(2) applies.

Non-Federal Awards

- There are no expanded authorities with regard to non-federal awards.
- It is important to follow all the term and conditions of the award or sponsoring guidelines.
- When in doubt, get prior approval.

Progress Reports

- §200.328 Monitoring and reporting program performance.
 - a) Monitoring by the non-Federal entity. The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities.
 - b) Non-construction performance reports. The Federal awarding agency must use standard, OMB-approved data elements for collection of performance information (including performance progress reports, Research Performance Progress Report, or such future collections as may be approved by OMB and listed on the OMB Web site).
 - c) Construction performance reports.
 - d) Significant Developments.
 - e) The Federal awarding agency may make site visits as warranted by program needs.
 - f) The Federal awarding agency may waive any performance report required by this Part if not needed.

Grant Transfers

- Grants Transferring Out:
 - Is the grant transferable?
 - What is the relinquishment date?
 - Will a subcontract back to the University of Memphis be necessary?
 - Has the sponsor been notified?
 - The amount to be transferred is not absolute until the final Financial Status Report is submitted to the Federal agency.
- Grants Transferring In:
 - Treated like any new grant
 - There is only so much that can be done prior to the Faculty member arrival. But, submit a Proposal Summary Form (PSF), estimated budget, estimated period of performance begin date, and contact information from the transferring Institution. Research Support Services will contact the Institution to facilitate the transfer.
 - It usually takes the Institution at least 90 days after the relinquishment date to complete the final Financial Status Report.

Effort

- Research Support Services is often involved in determining the appropriate level of effort to be charged to a project during the budgeting phase. Here are some criteria to consider:
 1. Is there effort related to the project (i.e., not an equipment grants)? Most grants have associated effort!
 2. Is the Investigator a full-time tenure track faculty member?
 3. How many courses does the Faculty teach (estimate 20% per course as a baseline)?
 4. How many grants does the Investigator have and what is the plan to adjust the effort in the event the project is awarded?
 5. Does the grant allow salary and wages? Or, will effort be cost-share to the project. Effort not accounted for in the financial system may lead to an Investigator being over committed.
 6. Faculty effort may not exceed 100%. The Institutional Base Salary (IBS) is defined as the annual compensation paid by an IHE for an individual's appointment (§200.430(h)(2) Salary Basis).

Subawards

- Research Support Services facilitates the execution of a subaward to a third party after the project is awarded. The Principal Investigator or his/her delegate will be responsible for initiating the purchase order, once the subaward is executed.
- Consulting agreements and contracts for service are procurement instruments and are the responsibility of the Principal Investigator or his/her delegate to initiate after the project is awarded.

Questions

- Contact Research Support Services at researchsupportservices@memphis.edu