2016 BRINGING ADMINISTRATORS TOGETHER CONFERENCE

# **Can Prove:** Trends in Post-Award Research Administration

April 14, 2016 (10:15 – 11:15AM)

UNIVERSITY OF ILLINOIS
AT CHICAGO



707South Morgan Street



# Workshop Presenter(s)

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## Please ...

- Turn off cell phones.
- Avoid side conversations.
- Hold your questions until the end.
- Sign the attendance roster.
- Complete the evaluation at the end of the workshop.



## Workshop Objectives

- Describe best practices for managing after-the-fact expenditure review, departmental billings, cost sharing, and effort reporting
- Avoid common mistakes in processing and documenting after-the-fact expenditure reviews, departmental billings, cost sharing, and effort reporting
- ☐ Identify resources and tools to assist with managing these complex topics



## **Topics**

1. Key Personnel & Effort Reporting

2. Cost Share Commitments





3. After-the-Fact Expenditure Review

4. Departmental Billing/Invoicing





### **Key Personnel & Effort Commitments**

Who IS managing and who SHOULD manage this?

## What just happened???

✓ Lapse in communication between the PI or HR and Business Manager (BM)



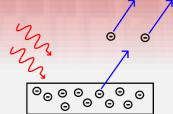
✓ BM clarifies his understanding of the situation

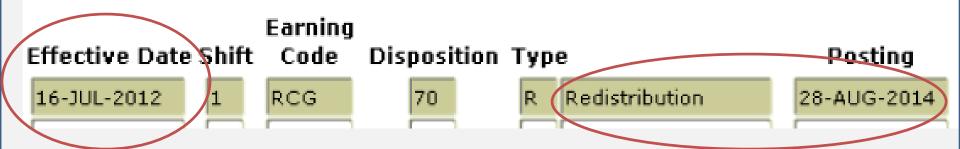
✓ PI corrects understanding

✓ BM realizes the various implications to this correction



1. Labor redistributions may require effort recertification





- Was this LR incorporated into the AY12 Effort Report?
- Was a new FOAP included in this LR?
- ? Are state funds being affected?
- ? Was a GC-81 completed?



2. Tracking whether effort commitments are being met for all key personnel



- Does effort proposed match actual effort?
- Is there a valid reason for the deviation?
- ? Has the sponsor approved this deviation?



#### 3. Recognizing Salary Cap

- Example:
  - > NIH salary cap is \$185,100
  - > Dr. Gru's Institutional Base Salary (IBS) = \$200,000
  - The percentage of salary above the cap is an unallowable cost to the grant, but must be documented to capture total effort on the award.
  - ➤ % of salary > the cap: (IBS Cap)
    IBS
  - (\$200,000 \$185,100) = 7.45% (Unallowable cost to the grant) \$200,000



- Salary Cap Example (cont'd):
  - > NIH salary cap = \$185,100
  - > Dr. Gru's Institutional Base Salary (IBS) = \$200,000
  - ➤ 25% effort on an NIH R01 grant

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($200,000 \times 25\%) - ($185,100 \times 25\%) = $3,725
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or

$$($200,000 \times 25\%) = $50,000 \times 7.45\% = $3,725$$

➤ Over-the-cap salary = \$3,725



Salary Cap INCORRECT Example (cont'd):

Effort Certification Worksheet for:
UIN: (
Home Department:
Contract Year: August 16, 2014 through August 15, 2015
Institutional Base Salary: \$393,172

FUND:	Fund	Org Code	Related Salary	Effort
2015 Effort to be Certified				<u>9%</u> *
Effort (Salary) Charged to Grant			\$36,309	9%
Committed Cost Sharing (?)				0%
Cost Shared Effort/Salary Cap				
Cost Shared Effort/Salary Cap				
Variance (Click for Details)				0
None - Please select a comment i	if required		₩	
Effort Accounted For on Fund	1			9%



Salary Cap CORRECT Example (cont'd):

#### **Business Manager Form**

FUND:	Fund	Org Code	Related Salary	Effort
2015 Effort to be Certified				16%
Effort (Salary) Charged to Grant		þ	\$29,800	8%
Committed Cost Sharing (?)				0%
Cost Shared Effort/Salary Cap				8
Variance (Click for Details)				0
None - Please select a comm	ent if required		~	
Effort Accounted For on Fund				16%

#### **Certifier Form**

123456, Grant E1234 - Federal

Cost Shared Effort/Salary Cap for 123456 | - 8%



4. Bi-weekly paid on sponsored funds: WEB TIME is your friend...NO MORE PAPER

#### The key elements required are:





## b. Sponsored award (C-FOAP) being charged

- c. Employee signature/attestation
- d. Approved by individual with best knowledge of time spent and account distribution



## **Effort-Related Best Practices**

- ✓ Complete a GC-81 for those labor redistributions >90 days & determine if a recertification is necessary
- ✓ Track <u>all</u> key personnel effort commitments on a continuous basis
- ✓ Ensure salary cap(s) are properly documented on the annual effort certification
- ✓ Use web time, but if not an option be sure to incorporate all required elements



#### **Cost Share Commitments**

What is it, who is involved and how do we track this?

## What just happened???



- ✓ There is a \$1M cost sharing commitment documented in the proposal
- ✓ PI identified cost sharing as "donated"
- ✓ BM was not tracking the commitment but now needs to provide documentation
- ✓ BM may potentially need to do cost transfers and effort recertifications

 Real Life Example: A Federal program requires 30% cost sharing of the total project costs over a 3-year award period.

Туре	Funding Source	Award	Cost Sharing
Acquisition Expense	Federal agency	\$1,995,000	
Acquisition Expense	Provost		\$250,000
Acquisition Expense	Research Center		\$150,000
Acquisition Expense	Academic Units		\$150,000
Operating Expense	Research Center/ Academic Units		\$305,000
Total Budget		\$1,995,000	\$855,000
<b>Total Project Cost</b>	\$2,850,000		

Expense	Amount
Installation	\$17,000
Passage Opening	\$12,000
Room Alterations	\$33,700
Electrical	\$16,700
Helium Compressor	\$30,000
Supplemental Cooling	\$10,000
Install Vent	\$10,000
Fire System	\$35,000
Management Fees	\$35,000
Total	\$199,400

On top of the 30% match, the institution is contributing these expenses per the budget justification...

YES! This is voluntary committed

## Originally Proposed Operating Budget

Operating Expenses	Year 1	Year 2	Year 3	Total
Director Salary	\$7,000	\$7,140	\$7,283	\$21,423
Operator Salary	\$61,000	\$62,220	\$63,464	\$186,684
Electronic Engineer	\$6,000	\$6,120	\$6,242	\$18,362
BL1 Service Plan		\$7,550	\$7,550	\$15,100
Helium Service		\$28,500	\$28,500	\$57,000
O2 Sensor	\$2,000			\$2,000
Data Storage	\$4,431			\$4,431
Operating Totals	\$80,431	\$111,530	\$113,039	\$305,000



## What did we receive for support?

- ✓ Eddie ledgers & spreadsheets = \$10,000
  - Is the burn rate on target?
  - Is the large deficiency due to poor tracking or lack of expenses?
- ✓ An itemized spreadsheet of cost shared expenses

LN: PCA1 1/12/2012 THE HOME DEPOT #1950 \$58.17 Snowbrushes for SUV

#### ?Are snow brushes an appropriate expense???

- Was this part of the original budget?
- Is there a justifiable explanation?

# **Cost Sharing Best Practices**

What should the business manager do at the time of the award?

- ✓ Set up a new fund or program code
- ✓ For effort/salary cost sharing commitments, return the completed cost sharing spreadsheet to GCO
- ✓ Create/Update tracking mechanisms for personnel and non-personnel commitments

It's what you can prove....



**After-the-Fact Expenditure Review** 

Do you know what has been charged to your grant?



## What just happened???



- ✓ PI does not have the time to review reports (i.e., not seen as a priority)
- ✓ Reluctantly, the PI takes a quick glance and signs off
- ✓ BM approaches student in the PI's lab to complete the outstanding review
- ✓ Student identifies erroneous charges on the project



- Erroneous charges (un/detected)
- Multiple and/or delayed cost transfers

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GC81 - Cost Transfer Justification for Sponsored Projects

This form is required to process non-current cost transfers and other cost transfers as outlined in policy and must be completed by departments, with the exception of GCO and other University Administration departments.

- Large unobligated balances or overdrafts
- Undocumented reviews

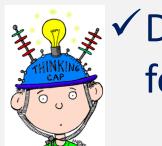


# **Expenditure Review Best Practices**

- ✓ Get into the routine of reviewing reports with Pls/designees on a monthly basis
- ✓ Develop a framework for your review process



- Familiarize yourself with award terms & conditions
- Continuously track & monitor effort commitments
- Consistently monitor expenditures (pre and post)



✓ Determine which reporting tools works best for you and your PIs/designees

# **Expenditure Review Best Practices**



✓ Process timely labor redistributions and cost transfers



✓ Resolve overdrafts and manage high unobligated balances

✓ Document your review





#### **Departmental Billing**

What IS the process and what SHOULD the process be?



## What just happened???



- ✓ Final invoice submitted by department for \$80,000
- ✓ Billed for expenses that were not posted in Banner
- ✓ Department didn't send a copy of the invoice to GCO for review
- ✓ Sponsor hasn't paid the final invoice and BM asks GCO for assistance
- √ >90 days after project ended, costs haven't posted to the grant



## It Really Happened!

- ➤ Department invoiced for full award amount on a cost reimbursable contract
- > Invoice was not routed to GCO for review & signature
- > Sponsor subsequently paid
- ➤ Grant was audited University received audit finding because...
  - Failure to adhere to billing terms
  - Lack of adequate support for costs
- > Institution had to return the money, plus interest

- Invoicing for unrecorded/unsupported cost
- Untimely/improper cost transfers
  - Charges not "allocable" to the grant
  - "Spending down" remaining grant funds





Discrepancies between the ledger and invoices/reports sent to sponsor



#### 5 W's and 1 H:

**WHAT:** Departmental invoices

WHO: GCO is the authorized official

**WHEN:** Every billing and ≥5 days before due

WHERE: Grants & Contracts contact or office

**WHY:** Record accounts receivable

**HOW:** Per billing terms or consult GCO



In some cases, it is appropriate for the department to prepare the invoice. Please remember...

- Prior to sending the sponsor an invoice, send a copy of the invoice to GCO.
  - ✓ Provide as much detail in the invoice as required
  - ✓ Only bill for expenses posted in Banner for the period
  - ✓ Assign a unique invoice number
  - ✓ Include the billing period and billing date
  - ✓ CLEARLY indicate that this is an invoice/bill

Include grant/contract details:



#### **INVOICE**

#### Originating Office:

Grants and Contracts (MC 551)
Ofc of Business and Financial Services
809 S Marshfield Ave, 511 MB
Chicago, IL 60612-7205
(312)-996-5961

#### Bill to:

University of Pennsylvania Attn Hermon Mebrahtu 3620 Walnut St

Philadelphia, PA 19104-6220

Sponsor Agreement #: UPENN Sub 567370/10039997/1563

#### Long Description:

UPENN TCORS Tobacco Product Messaging in a Complex Communication Environment

#### Make Check Payable to:

University of Illinois

Remit to:

University of Illinois Grants & Contracts 28395 Network Place Chicago, IL 60673-1283

**Date:** 09-Mar-16

UI Ref #: E1995

Invoice #: 001 - 000

Period: 01-Sep-15 - 29-Feb-16

 Clearly indicate the total direct costs, indirect cost total, and total payment due

University Expense Group	Budget	Previous Billings	This Billing	Total Billings
Budget Pool	31,966.00	.00	.00	.00
Salaries & Wages	.00	.00	1,005.11	1,005.11
Fringe Benefits	.00	.00	403.44	403.44
Total Direct Costs F&A Costs		.00	1,408.55 842.32	1,408.55 842.32
Total Less Previous Vouchers	31,966.00	.00	2,250.87	2,250.87
Total Billing				2,250.87

Include supporting documentation as required or when requested by sponsor



- Received the sponsors check?
  - ☐ Be sure to forward it to Grants & Contracts



## Workshop Summary

Strong internal controls provide reasonable assurance that\*:

- Information is reliable, accurate, and timely
- Policies, plans, procedures, laws, regulations, and contracts are followed
- Assets (including people) are safeguarded
- Resources are used in an economical/efficient manner
- Established objectives and goals are met
- \* Excerpt from OBFS website: <a href="https://www.obfs.uillinois.edu/accounting-financial-reporting/fciaa/">https://www.obfs.uillinois.edu/accounting-financial-reporting/fciaa/</a>



## Resources

 UIC Policies of Institutional Base Salary and Effort Reporting

https://www.uic.edu/home/images/Key Effort reporting and related policies.pdf

Cost Share Job Aid

https://www.obfs.uillinois.edu/common/pages/DisplayFile.aspx?itemId=95356

• OBFS Business & Financial Policies & Procedures: Section 16-Grants & Research Contracts

https://www.obfs.uillinois.edu/bfpp/



## Resources

UIC Guidelines for Managing An Award

https://www.obfs.uillinois.edu/grants/essentials-post-award-administration/chicago/managing-award/

UIC Guidelines for Monitoring Expenditures

https://www.obfs.uillinois.edu/grants/monitoring-expenditures/



# **Questions / Concerns?**

