Post Award Management

The who/what/when/why and the roles and responsibilities for managing grants in the Colleges of Pharmacy and Public Health and Human Sciences

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Grant Management Overview

Post award grant management at OSU is a combined effort between our research faculty, college support personnel, Business Center personnel, and OSRAA. All parties serve a role in furthering the research mission of the university by managing sponsored projects. This includes ensuring that research objectives progress satisfactorily, reports/deliverables are completed, expenses are adequately documented, and compliance requirements are met.

We’re here today to explain in greater detail just who does what - and how, why, and when - for the Colleges of Pharmacy and Public Health and Human Sciences.
You have been funded! What happens next?

OSRAA:
• First sends an "award intake" email to PI and HSBC. This is only a notification that the award has arrived and may note additional steps required by the PI.
• Executes the agreement and establishes the index(es) in Banner. You should receive an index announcement, with a "PI letter" from OSRAA. All project expenses should be charged to this index.

HSBC:
• Will send a follow up email, noting any labor included in the proposal and inquiring if/when work has begun and, if so, by whom and at what FTE level. Labor included in the proposal does not automatically trigger a labor change to be done.

PI:
• Responds to the award intake, if additional steps are required. Review the PI letter and the HSBC follow up email carefully. Verify any required payroll changes and ask any other related questions as soon as possible.
Who can explain why I have multiple indexes?

If the award has been set up with multiple indexes, that should be noted in the PI letter and HSBC follow up message. If not, or if you have any questions, please contact HSBC. This can be for any one of a number of reasons, such as:

• Period-specific (“bracketed” funding), which requires separate tracking/invoicing/reporting for each project period (very common with NIH funding)
• Multiple indirect cost rates
• Participant support (for example, fellowship/traineeship awards)
• Multiple PIs, particularly if a co-PI is in a different college/unit
• Other sponsor/award specific requirements which mandate that OSU records costs separately and/or invoices separately

There is always a reason why you have multiple indexes - when uncertain, please ask!!
What are the responsibilities of the PI, HSBC, and OSRAA?

**PI initiates and/or approves:**
- All (both payroll and non-payroll) costs charged to the index.
- Subaward agreements and approval of subsequent invoices.
  - OSRAA executes agreement and sends invoices to the PI. HSBC processes payment after PI approval.
- Interim and final progress reports
- Expense reviews and corrections - requests for corrections should be forwarded to HSBC

**HSBC:**
- Processes expenditures and any requested corrections and provides transaction/balance reports to PI

**OSRAA:**
- Invoices sponsor as costs are incurred (unless advance payment award)
- Executes amendments for additional time and/or funding for incrementally funded awards
- Executes subawards and subaward amendments
Managing Project Changes

Unforeseen events or changes can occur as the project progresses, for example:

• Labor changes may be required, and Personnel Activity Reports (PAR) forms certified/recertified
  ❖ PARs are run by OSRAA, circulated by HSBC, and reviewed and certified by PI
• Rebudgets, carryover requests, project extensions, additions/changes to subs
• Some changes require prior sponsor approval, while others do not
• The varied actions required to execute and document needed changes may involve college, HSBC, or OSRAA personnel - or a combination of any/all

• Let us explain in more detail...
Managing Project Changes (cont.)

**PI:**
Alerts Ian that there has been/will be a change in the project and what that change entails. Proactive notification is always best, if at all possible.

**Ian:**
Reviews the award to determine any required prior approvals. Some agencies allow the PI to take certain actions without approval, such as

- Pre-award costs (up to 90 days prior to project start date)
- The first no-cost extension (up to 12 months)
- Rebudgeting in many instances (exceptions include changes in key personnel effort of 25% or more from committed level (not simply 25%), reduction to participant support)

**OSRAA:**
Will be the official point of contact to sponsor when prior sponsor approval is required.
Managing Project Changes (cont.)

For changes which require prior sponsor approval, PIs can work with Ian and OSRAA to submit that request. Examples of those changes include:

- Any change in the project scope of work
- Rebudgeting beyond the explicit allowances specified in award
- Carryover from one project period to another, if no automatic carry forward provision exists (noted in PI letter)
- Addition of a sub-awardee not included in proposal (most sponsors)
- Change in PI or other named Key Personnel

Ian can assist in determining required steps, and OSRAA will contact the sponsor
Expense Monitoring and Financial Reviews

HSBC:
Produces grant reports from the OSU system (or PIs can retrieve at https://CORE.oregonstate.edu). Various reports are available; Ian or HSBC can assist.

- HSBC reports include budget, expense (both payroll and non-payroll), encumbrance, and anticipated balance information for each index.

PI:
- Reviews report(s) and responds to HSBC questions. Requests corrections from HSBC, citing research need and reason for the error. Signs labor changes (except his/her own).
- Provides additional justification for corrections requested more than 90 days retroactively

OSRAA:
- Approves all non-payroll corrections and labor corrections more than 90 days retroactive
Labor Distributions

Labor changes are not unusual, but need to be requested timely by the PI so corrections can be made as soon as possible. Requirements around labor changes include:

• The change must be a reflection of actual/anticipated effort on the grant. Any reduction of 25% or more of key personnel committed effort or any change in scope requires prior sponsor approval

• A supervisor must sign labor changes for PI effort

• Labor distributions post only twice/month (GRS and CORE may not reflect the changes right away)

• All labor changes are subsequently certified with the Personnel Activity Report (PAR), as federally required
Effort Reporting

Effort reporting is a federal requirement with which OSU must comply.

**OSRAA:**
Generates PARs after each quarter for individuals with pay on any sponsored project or cost share funds. PARs reflect current pay distribution in system; labor changes recently requested may not be reflected on the PAR form.

**HSBC:**
Verifies that PAR reflects most recent labor distribution and corrects, if needed. Sends PAR to PI.

**PI:**
Must review/certify PAR and return to HSBC - contact HSBC if the PAR is incorrect

- PARs reflect effort for the overall quarter - changes will be averaged in the PAR calculations
- Summer and academic year pay appears on separate lines on the PAR form
Purchasing from Sponsored Project Funds

PI:
• Initiates/approves purchases - contacts HSBC as needed

HSBC:
• Assists with purchasing process, may liaison with central procurement office (PCMM)
• Can provide policy guidance, as needed, including critical items to remember, such as:
  ❖ Participant incentives - including gift cards and cash advances
  ❖ Goods and services must be received prior to the end date of the award
  ❖ Purchases $5k-$25k require a purchase order/contract
  ❖ Over $25k must meet Uniform Guidance/OSU Policy Requirement
  ❖ Large purchases (i.e., equipment, computers, etc.), made near end date can be scrutinized
  ❖ Memberships that exceed the award period must be prorated
Purchasing from Sponsored Project Funds - Unallowable Costs

**PI:**
- Provides justification/business purpose to document the research need

**HSBC:**
- Reviews when issuing grant reports, inquires with PI and/or makes corrections for:
  - Examples of specific unallowable costs on federal awards:
    - Advertising - except for recruitment or program announcements/outreach
    - Public relations/fund raising/entertainment costs
    - Contributions or donations
  - Expenses that require additional information to determine allowability
    - Parking permits, employee clothing (cannot be personal expense)
    - Hosting expenses
    - Visa/passport processing fees
Closing Incremental or Bracketed Periods

Closing budget periods within a longer-term project period is most typical on incrementally funded awards with specific limitations or requirements - very typical with flow through funding.

**OSRAA:**
- Reviews agreement, sets up separate indexes, if needed, communicates to HSBC/PI in PI letter
- Submits carryover requests to sponsor

**HSBC:**
- Initiates inquires/required actions for PI confirmation (copy to Ian)
- Assists PI in closing project period, as needed, even if ongoing award

**Ian:**
- Assists with requesting carryforward
  - Automatic carryforward vs. prior approval required - request 60 days in advance
• Important to notify Business Center in any change in effort from one period to the next

• Ensure proper index is used for the given budget period when previous period budget has been exhausted or carryforward was not approved

• Cost transfers should be submitted within 90 days of the original expenditure

• No Cost Extension requests should be submitted 60 days prior to the end of the award
Managing Subawards

**OSRAA:**
- Collects required information/forms from PI and executes subaward. OSRAA is first to receive/review invoices from subawardee, then sends to PI for approval. OSRAA forms:
  - New Subaward Request Form
  - Subaward Amendment Request Form
- Creates encumbrance for sub in Banner - shows actual available balance after obligation

**Ian:**
- Can assist with subaward budget and OSRAA forms.

**PI:**
- Reviews/approves all subaward invoices - verifies research progress is consistent with billing
- Provides rebudget information to HSBC, if needed. Rebudgets can impact indirect costs.

**HSBC:**
- Pays subaward invoices, manually clears encumbrance, and enters rebudgets, if needed
Reporting Requirements

At a minimum, most awards require a final financial report and a final technical report at closeout, some also require interim reports. Deadlines vary but can be very short.

PI:
• Submits interim progress reports, as required
• Submits final progress report and patent/invention statement for NIH

Ian:
• Can assist in verifying frequency of required interim reports and provide guidance to PI

HSBC:
• Provides OSRAA final expenditure figures for financial reports - in consultation with PI

OSRAA:
• Submits final and interim financial reports, may submit RPPRs
• If RPPRs are required, OSRAA submits if OSU is the prime. The PI is responsible for submitting the report when we're the sub
Closing the Award

Typical requirements include financial and technical reports, and a final review/verification of cost share, effort reporting, and allowability of all costs.

**HSBC**
- Conducts final cost review (starting ~ 120 days out), checks with PI if questions
- Provides final expense figures for OSRAA (in consultation with PI)
- Verifies cost share has been met, if applicable, and all PARs are on file
- Provides index to OSRAA for fixed price transfers

**OSRAA:**
- Completes and submits final invoice, final financial report, and sometimes other required reports (patent/invention, equipment, etc.)
- Completes any required cost overruns or fixed price transfers
- Closes the award in Banner
Closing the Award (cont.)

- **PI:**
  - Submits all technical reports
  - Submits subaward closing documents
  - Provides HSBC with new effort distribution for grant personnel
  - Responds to any closeout inquiries from HSBC and confirms when final expenses have posted - *any costs beyond date of final invoice to sponsor are at risk of not being recovered*
  - Deadlines for final expense confirmation can be as short as 15 days - OSRAA requires this at the halfway point between the project end date and the sponsor's deadline for final reporting/invoicing/drawdown
Audits and Documentation Standards

OSRAA will take the lead in an audit, but will reach out to the PI and HSBC if additional information or documentation is needed. Documentation standards require that the business purpose (who/what/why/when) is made clear and documented with each expense. Additional justification is generally needed for:

- Large purchases or significant cost transfers made near the end of an award
- Costs typically determined to be unallowable
- A layperson would not easily identify the research need (i.e., unusual expense or expense that appears personal in nature)
- How expenditure splits are derived (allocability)
- Cost transfers more than 90 days retroactive
- Labor changes when prior PARs have been certified
Q&A and Comments from the Session

• We took questions throughout the presentation. Here is a summary of the majority of them. This is not verbatim with the video, but rather more refined conversations.

• If you have questions or comments, please direct them to Ian Goldberg (Ian.Goldberg@oregonstate.edu) and he will get you a response.
Q&A and Comments from the Session, pt. II

• Q: We don’t have an index yet. How can we charge payroll in the meantime?
  • A: If we don’t yet have the award intake message from OSRAA, requesting a pending index to be established is an option. This allows expenses to be charged to the index prior to the execution of the award. However, it is important to note that the unit assumes the risk of such expenses unless/until the award becomes fully executed and the costs are within the period of performance.

• Q: We asked about a pending index and were told not to use one.
  • A: If the award is already in house and just being processed, OSRAA may opt to wait until the award is executed. The pending index mechanism is ideally used in situations in which the agency has informed us that the award has been funded, but they hasn’t sent the agreement yet. In those instances, we can always submit a request for the pending index.
• Q: How do we do a carryforward request?
  • A: OSRAA officially submits the request. Ian can assist with the
documentation, including budget information or justification as to how the
funds will be spent in the upcoming funding cycle.

• Q: What if I am confused by which bracketed funding index to use?
  • A: Ask HSBC or Ian to explain the purpose of each so you use the right one.
There are a number of reasons that multiple indexes might be set up, so it
is very important to be aware of those reasons and to use the correct index.
If in doubt at all, please seek assistance from Ian or from HSBC.
Q: What about the issue were PIs are not always copied in correspondence between OSRAA and HSBC or OSRAA and the Agency?
   
   • A: That is the struggle in research administration, to keep everyone posted and connected in communications. HSBC will make an extra effort to see that the PI is included in the emails.

• Marie Harvey added this: OSRAA is evolving and changing and under new management right now. Things are getting better, and will continue to do so. If you have a sticky situation with OSRAA please copy Marie in, as she regularly directly reaches out to Tuba Ozhan-Haller, our AVP for Research.

• Mark Leid recommends that Pharmacy folks do the same, copying him in if things seem a little testy.
Q: What do you suggest for the final expenses interaction with OSRAA? It will look like everything is fine, then I hear something else is messed up.
   • A: Please send examples. This is a good reminder to copy in Ian so that he can assist.

Q: OSRAA seems to be submitting things without copying the PI in. Can something be done?
   • A: You could try reminding OSRAA to keep you in the loop. HSBC will re-emphasize including PIs in their communications.

Q: How can we keep Ian in the loop on any of these matters?
   • A: You can CC: him at Ian.Goldberg@oregonstate.edu
Q&A and Comments from the Session, pt. VI

• Q: Should we copy Ian in on everything?
  • A: It’s better to send too much than too little. Please just be sure to make it clear if you have a specific issue that you need advice on.

• Q: When is the transition (in Public Health) between CJ Clevinger and Ian in who can help us?
  • A: The transition between pre- and post-award is typically when the index is established. Some things do land in the middle, but if you copy both of us in one of them will grab it. This is the same with Pharmacy, where Chiron Alston is on the pre-award side. Copy in both sides until one of us starts working with you.
Q&A and Comments from the Session, pt. VII

• Q: I have received a PAR form that has many people listed on it. What do I do if only one of them is incorrect?
  • A: Reject the whole form, put the specifics in the Comments block on the form.

• Side comment from Lisa about being a sub on a grant: Some pass-through sponsors may not flow all of the terms from the prime down to us, so it is important to be aware of the actual terms of our award. If you have questions about the terms, you can request assistance from Ian.

• Q: When we are reviewing our financial reports and see wages or OPE that don’t look right, what should we do?
  • A: Please reach out to HSBC and provide the specifics. If there is a needed fix, they are typically responsible for making the correction.
Q: Do the restrictions on changes in labor include distinguishing between academic and summer pay?
  A: No, the effort commitments are typically by budget period. Often the agency is content to only look at the entire effort over the project period.

Q: What are the quarters on the PAR form? Does it align with the grant?
  A: PAR forms are run by calendar quarter, regardless of the project period of the award.

Q: Does an individual’s effort only show up on the project with the biggest piece? As the PI, if you have that same person for less FTE you won’t review and approve the PAR.
  A: PARs are currently by individuals, and go to the Business Center which services the employing unit for that individual. HSBC could send multiple PARs to multiple people, but that is not the official practice. We do understand the frustration, and do want you to have visibility.
  The university is exploring a change to project-based PAR forms, in which case each PI would get a PAR for each project showing the effort for everyone paid on that project.
  Remember that PARs are not the only way to see the labor on your grants. HSBC or Ian can provide assistance in verifying current payroll, as needed.

Q: What happens to memberships and subscription expenses which cover periods beyond the end of a grant?
  A: Those expenses can be split between periods.
Q&A and Comments from the Session, pt. IX

• Q: Some expenses are small, making it very tedious for a PI to review. How can we confirm them all?
  • A: It does take a lot of time to thoroughly review expenses. HSBC also reviews expenses for allowability when approving payments or sending grant reports.

• Q: Expenses are sometimes lumped together in spots that weren’t planned. How do we know if we need to make a budget adjustment?
  • A: Expense categories are identified and coded at set up. Sometimes they aren’t interpreted perfectly, and can be open to interpretation. When you see examples of expenses recorded in unexpected ways, bring them to HSBC’s attention. If corrections are needed expense codes, HSBC can make those changes.
Q&A and Comments from the Session, pt. X

• Q: What if the agency asks questions about the nature of travel expenses?
  • A: These expenses should be appropriately documented, which allows us to respond to agency inquiries. If documentation is not sufficient or further information is needed, OSRAA will typically seek assistance from the HSBC and/or the PI.

• Q: What if different equipment is needed from what was on the approved proposal?
  • A: We often have the budget authority to make smaller adjustments. If the change exceeds our budget flexibility, we can make the request for approval from the sponsor. This rarely results in additional funding, but rather permission to move some awarded budget between categories.

• Marie Harvey then reminded everyone that the budget justification is powerful. If you have something detailed there and it was approved, you can buy it. So be sure to include the specific descriptions in the budget justification, because otherwise you could be limited by the terms of the agreement.

• Marie cited clothing as an example. This is normally not an allowable expense. If you have documented that the shirts are needed for the specific work you are doing in the justification and not just the budget, you will likely be allowed to make the purchase.
Q: Should I copy OSRAA on any conversations or reports submitted to the agency?
• A: Yes. OSRAA will likely want to include that communication in the electronic file as part of the official record. OSRAA will typically be the outward facing means of communication with sponsors for communications such as prior approval actions, interpretation of award terms, and allowability questions.

The end of the discussion featured a number of questions about IRB. Those matters are not under the control of HSBC, Ian or OSRAA but with the IRB. You must work with the IRB office to resolve Human Subjects protocol issues on your grant.