

CPRIT Grantee Annual Compliance Training

March 2022



Contact Information

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Training Overview

- Introductions
- FWA Reporting
- Policy and Procedure Guide Overview
- Recent Administrative Rule Changes
- Required Reporting
- Programmatic Topics



Fraud, Waste, & Abuse

Fraud, Waste, & Abuse

How do I Make a Report?

Use Client Code #5124633190

(Users can remain anonymous)

Call

1-877-64-RedFlag

(1-877-647-3335)

Online

www.RedFlagReporting.com



Fraud, Waste, & Abuse

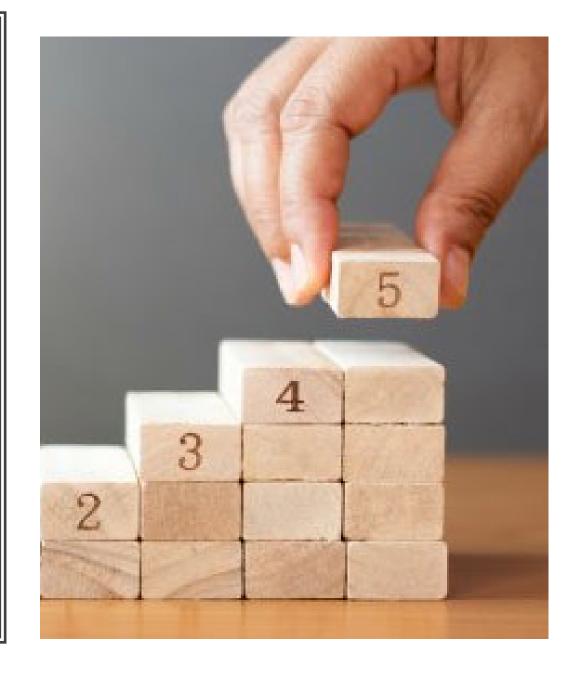


Policies & Procedures



Grant Policies & Procedures Guide

- Rules
- Statute
- Grant Contract
- Texas Grant Management Standards (formerly Uniform Grant Management Standards)



Emphasis on Guide

- The Grant Policies & Procedures Guide is only a resource
- The Grant Policies & Procedures Guide is not an authoritative source
- CPRIT's rules, statute, and grant contract each outweigh the Guide



Administrative Rules

What are the Rules?

- Texas Administrative Code (TAC)
- TAC is a compilation of all state agency rules in Texas
- TAC is compiled, indexed, and published by the Texas Secretary of State
- Rulemaking Process

Source: https://www.sos.texas.gov/tac/index.shtml



- Chapter 701: Policies and Procedures
- Chapter 702: Institute Standards on Ethics and Conflicts, including the Acceptance of Gifts and Donations to the Institute
- Chapter 703: Grants for Cancer Prevention and Research





- CPRIT's rules contain many grantee reporting requirements
- Many changes and updates to grantee requirements happen through the rulemaking process
- The rules are the most cited source in the Grant Policies & Procedures Guide



Recent Administrative Rule Changes



- 1. Grant Contracts of Grantees in which CPRIT takes Equity
- 2. Reimbursement of Clinical Trial Participation Costs
- 3. Grant ID in CPRIT Acknowledgement



GRANT CONTRACTS OF GRANTEES IN WHICH CPRIT TAKES EQUITY

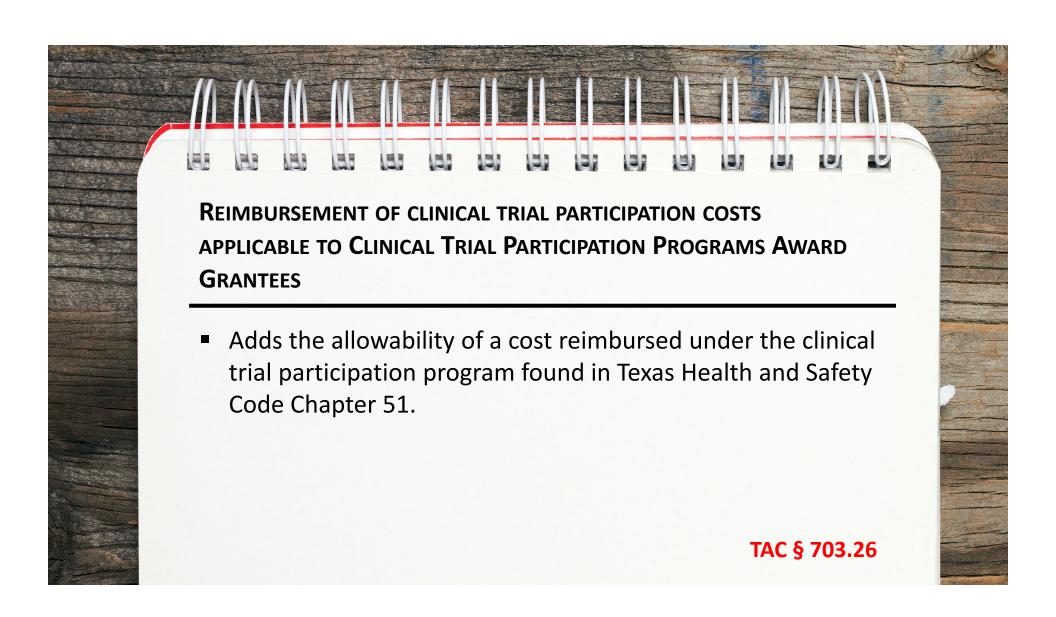
- CPRIT has the option to take equity in a grantee
- Taking equity may impact standard reporting requirements
- The proposed rule change requires to CPRIT to include any changes from standard reporting requirements in the grant contract
- Public comment will open soon

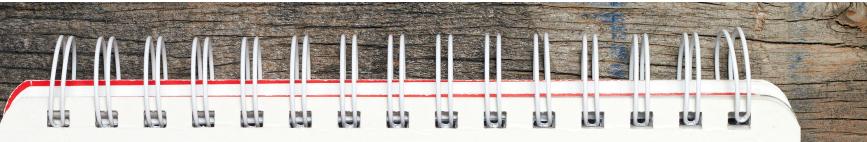
TAC § 703.17



REIMBURSEMENT OF CLINICAL TRIAL PARTICIPATION COSTS APPLICABLE TO ALL GRANTEES

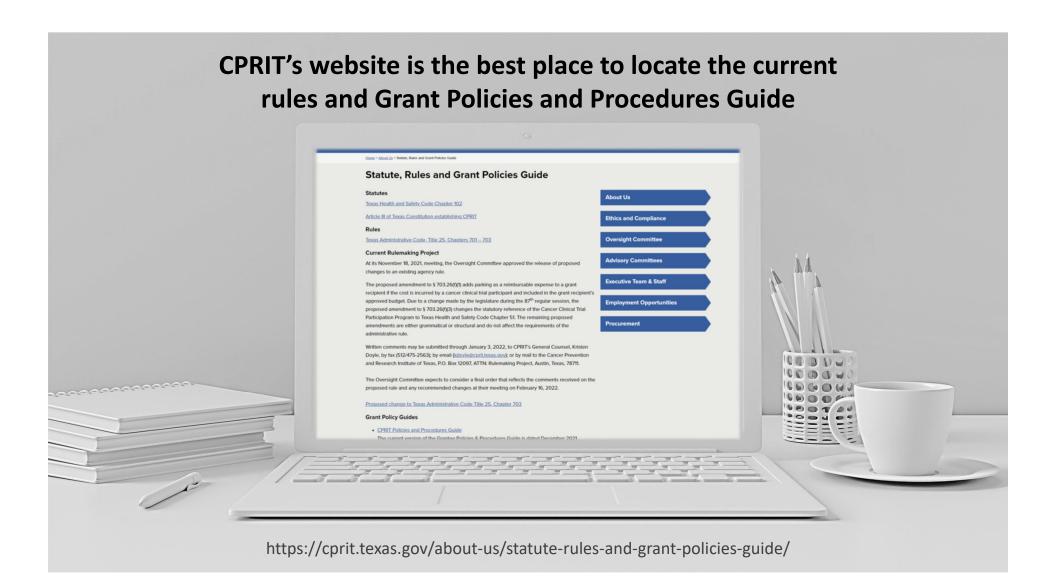
- CPRIT may reimburse a grantee for costs that a cancer clinical trial participant may have associated with their participation in a clinical trial, including:
 - 1. transportation, including car mileage, parking, bus fare, taxi or ride hailing fare exclusive of tips, and commercial economy class airfare within the borders of the State of Texas;
 - 2. lodging





GRANT ID IN CPRIT ACKNOWLEDGMENT

- Grantees must acknowledge CPRIT funding in any publication that reports information developed with CPRIT grant funds
- Grantees must include the applicable CPRIT grant ID number when acknowledging CPRIT in publications.
- Effective September 1, 2021





How to Stay Informed

- Check CPRIT's website
- Receive CPRIT listserv emails
- Watch Oversight Committee meetings
- Attend training webinars

Administrative Rule Changes

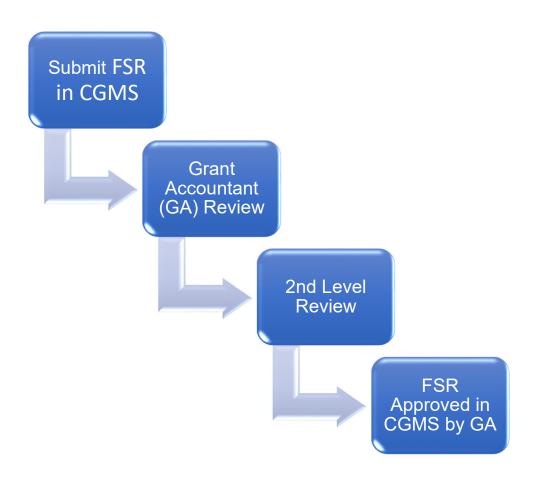
Q & A



Financial Status Reports (FSR)



FSR Review and Approval Process



FSR – Checklist

- Expenses are paid within FSR period (cash basis)
 7.6.3 Cash Basis Accounting
- Payment date is included for all transactions
- FSR amounts match ledger totals by expense category



FSR – Checklist

- Supporting documents are scanned in the same order as the transaction listing
- Supporting documents are legible
- Expenses are allowable



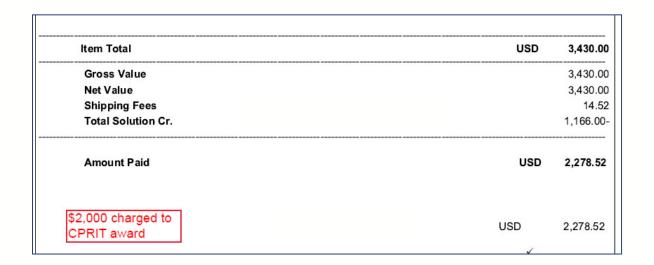
FSR – Checklist

- Invoice amounts match amounts shown on the ledger.
 Partial charges are explained on the invoice
- Expenses are properly categorized
- Justification provided for prior period expenses



FSR - Support Documentation

Identify the amount charged to CPRIT when less than invoice amount.





FSR - Allowable Costs

Costs should be:



Reasonable - Section 9.4.1

Allocable - Section 9.4.2

Adequately documented - Section 9.4.6

Note: CPRIT is responsible for making the final determination regarding whether an expense is an allowable expense



FSR – Examples of Unallowable Costs

- Individual Professional Membership fees
- Alcohol
- Tips & Gratuities
- Bad debt
- Lobbying costs
- Entertainment

FSR - Reporting

- No disbursement of grants funds will be made until all required financial and programmatic reports are approved
- If errors are made and adequate information is not provided, report will be disapproved and sent back for rework
- Allow enough time for ASO approval and submission before deadline



Financial Status Reports Q & A

Equipment

FSR – Equipment

- Include documentation of CPRIT approval for all equipment expenses
 - Initial Budget Justification
 - Change Not Otherwise Specified (CNOS)



FSR – Equipment

 Initial Budget Justification-include copy with FSR support and match amount to equipment on invoice:

LINE	PART ID	DESCRIPTION	U/M	TAX	QUANTITY	UNIT PRICE	EXTENSION
1	NIS0001	NanoAssemblr Spark Instrument	EA	R	✓ 1.0000	25,116.00	√ 25,116.00
2		FREIGHT CHARGE	EA	N	0.0000	0.00	78.50

Detailed Budget for Year One

Travel	\$3,000
Equipment (Itemized) Funds are requested to upgrade several instruments to optimize manufacturing and to enhance efficiency. Precision NanoSystems NanoAssemblr. Agilent TapeStation, Shaking Incubator, Oxford Nanopore Technology MinION (refer to budget justification for details).	\$50,000



FSR – Equipment

Change Not Otherwise Specified—include copy with CPRIT approval:



FSR Travel & Support Documentation

FSR - Travel

 A separate travel expense report should be submitted with all supporting documentation for each trip taken

Expense Report Components

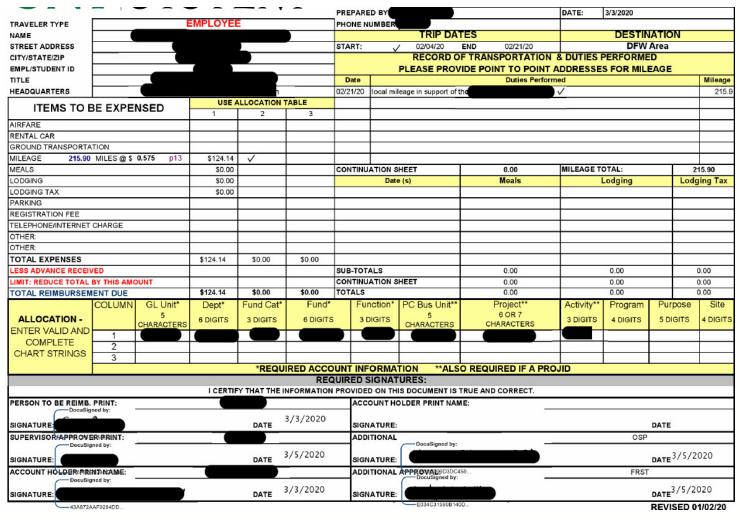
- Grantee Name
- 2. Name of person traveling
- 3. Date(s) of travel
- 4. Purpose of the travel
- 5. Itemization of expenses
- 6. Proof of payment



P&P Guide Reference: 10.4.3.1 Travel Expense Reports



FSR - Travel





FSR - Travel Expense Checklist

- Meals expenses supported by itemized receipts unless using per diem
- > Split receipts with multiple meals
- Exclude Group meals
- Exclude gratuities and alcohol



FSR - Travel Expense Checklist

- Meals and lodging expenses are within GSA limits
- Support includes copy of GSA rates for meals and lodging
- Taxi/Uber/Lyft receipts are included minus gratuities
- Receipts are legible



FSR - Travel Expense Checklist

- International travel expenses include CPRIT approval (must provide with FSR)
 - > Initial Budget Justification
 - Change Not Otherwise Specified
- > All travelers are listed on the PLOE
- Meals for day trips are excluded



FSR – Ineligible Travel Costs

- Alcohol or gratuities
- Airfare costs that exceed coach class
- Foreign travel without prior CPRIT approval
- Travel outside of the grant contract effective dates
- Employee traveling not listed on Personnel Level of Effort (PLOE)
- Dates of travel occur outside of the employee's PLOE period (Travel Only Exception)



P&P Guide Reference: 10.4.3.2 Meal Expenses 10.4.1 Allowable Travel Costs

FSRs - Foreign Currency

- Submit requests for reimbursement in United States dollar amounts
- If the original cost is in a foreign currency, the Grant Recipient must convert the cost to U.S. dollar amount and provide documentation of the exchange rate used for the conversion



P&P Guide Reference:
10.4.4 International Travel Requires
Prior Approval



FSR - Contractual Travel

Contractual Travel Costs	Required Support Documentation					
Airfare	Itemized Amount					
Mileage	Itemized Amount					
Hotel	Itemized Amount					
Meals	Receipts					
Taxi/Uber	Receipts					

FSR - Travel Q & A

Financial Status Reports – Personnel / Fringe

FSR-Personnel/Fringe

- Timesheets are signed by employee and supervisor
- Payroll ledger included and it ties to GL
- All employees are listed on PLOE with Level of Effort for current award year
- Fringe expenses are listed by category for each employee



Personnel Level of Effort (PLOE)

PLOE - Checklist

- PLOE is updated prior to submitting FSR
- Each employee with salary/fringe has Level of Effort for current award year
- All employees with travel, tuition, stipend and conference fees are listed on the PLO



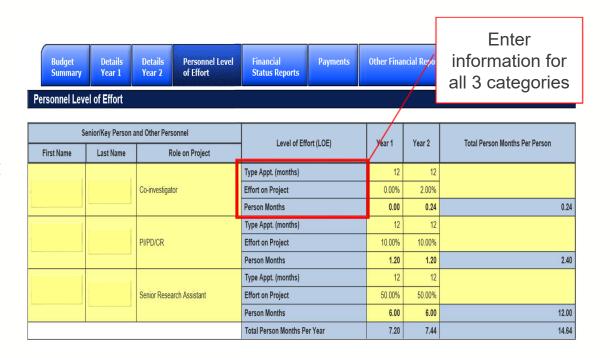
P&P Guide Reference: 5.5.8 Personnel Level of Effort Form



PLOE - Checklist

PLOE change requests contain all the following elements:

- type of appointment
- number of months
- % effort
- justification for the change



P&P Guide Reference: 5.5.8 Personnel Level of Effort Form



PLOE

reminder

When grant moves to closeout status from active status (equivalent to the contract end date), the PLOE <u>cannot</u> be revised in CARS-CGMS, and any expenses related to personnel not listed on the PLOE <u>will not be reimbursed</u>

Personnel Level of Effort Form

Q & A

No Cost Extensions (NCE)

• For No Cost Extensions (NCEs) where the grantee is requesting more than a 6-month NCE, the justification should include the increased number of months in the first sentence.



- No Cost Extensions- Decisions regarding NCE are based on several factors including the documentation of progress and documentation that the work proposed for the NCE is consistent with the initial award.
- CPRIT will not approve a NCE without a PI level of effort appropriate to scope of work being conducted

P&P Guide Reference:
13.3.1 NCE Eligibility
5.5.8 Personnel Level of Effort Form



- If you receive a no-cost extension, you must complete a PLOE for the extension time period
- For NCE's, the final report date changes but an additional annual report is required as well as quarterly reports until the end of the contract

Personnel Level of Effort

Back to Grants Search

Senior/Key Person and Other Personnel		Loyal of Effort (LOE)	V4	V0	Year 3	Year 4	V 5	Total Dance Mantha Dan Dance	
First Name	Last Name	Role on Project	Level of Effort (LOE)	Year 1	Year 2	rear s	Year 4	Year 5	Total Person Months Per Person
TBN	TBN	Postdoc - Biologist	Type Appt. (months)	12	12	12	12	12	
			Effort on Project	50.00%	100.00%	100.00%	100.00%	100.00%	
			Person Months	6.00	12.00	12.00	12.00	12.00	54.00
	TBN	Postdoc - Chemist	Type Appt. (months)	12	12	12	12	12	
TBN			Effort on Project	50.00%	100.00%	100.00%	100.00%	100.00%	
			Person Months	6.00	12.00	12.00	12.00	12.00	54.00
	TBN	Postdoc - Chemist	Type Appt. (months)	12	12	12	12	12	
TBN			Effort on Project	50.00%	100.00%	100.00%	100.00%	100.00%	
			Person Months	6.00	12.00	12.00	12.00	12.00	54.00
	TBN	Senior Staff Scientist	Type Appt. (months)	12	12	12	12	12	
TBN			Effort on Project	50.00%	50.00%	50.00%	50.00%	50.00%	
			Person Months	6.00	6.00	6.00	6.00	6.00	30.00

P&P Guide Reference: 5.5.8 Personnel Level of Effort Form



- Include time, process and justification requirements
- PI needs to have measurable level of effort during an approved NCE
- In order to receive a no cost extension, a grantee must be in good fiscal and programmatic standing



- No automatic approval of a grantee's first no cost extension request
- Must be submitted at least 30 days prior to contract termination but not more than 180 days prior



For No Cost Extensions (NCEs) the PLOE
 comes in as a zero by default – make sure
 PLOEs are current and accurate for NCEs



Other Personnel		Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person	
Role on Project		Level of Elloft (LOE)	rear r	rear 2	rears	rear 4	Total Ferson Months Fer Ferson	
Type Appt. (months)			0	0	12	12		
Program Coordinator		Effort on Project	0.00%	0.00%	100.00%	0.00%		
		Person Months	0.00	0.00	12.00	0.00	12.00	
Co-Program Director		Type Appt. (months)	12	12	12	12		
		Effort on Project	8.00%	8.00%	8.00%	0.00%		
		Person Months	0.96	0.96	0.96	0.00	2.88	
	Type Appt. (months)			0	4	12		
Project Assis			.00%	0.00%	60.00%	0.00%		
	Exan	nple of a NCE	0.00	0.00	2.40	0.00	2.40	
			0	12		12		
Program Ass	whic	h resulted in a	0097	10.00%	10.00%	0.00%		
	Voor	4 - automatically	0.00	1.20	1.20	0.00	2.40	
	Ieai	4 – automatically	12	12	12	12		
Co-Program	popu	lates with zeros	.00%	8.00%	8.00%	0.00%		
	bobo		0.96	0.96	0.96	0.00	2.88	
		Type Appt. (months)	0	0	4	12		
Program Coo	rdinator	Effort on Project	0.00%	0.00%	100.00%	0.00%		
		Person Months	0.00	0.00	4.00	0.00	4.00	
		Type Appt. (months)	0	0	4	12		
Project Assist	ant	Effort on Project	0.00%	0.00%	100.00%	0.00%		
		Person Months	0.00	0.00	4.00	0.00	4.00	
		Type Appt. (months)	12	12	12	12		
PI/PD/CR		Effort on Project	50.00%	50.00%	50.00%	0.00%		
		Person Months	6.00	6.00	6.00	0.00	18.00	
Project Assistant		Type Appt. (months)	0	0	1	0		
		Effort on Project	0.00%	0.00%	100.00%	0.00%		
		Person Months	0.00	0.00	1.00	0.00	1.00	
		Total Person Months Per Year	7.92	9.12	32.52	N/A	49.56	



Matching Compliance Certification (MCC)

- Institutions of Higher Education may use their Federal Indirect Cost Rate to fulfill match requirement
- Institutions of Higher Education <u>must upload to each grant record</u> most current indirect cost rate agreement
- If grantee uses a blended indirect cost rate calculation, grantee is
 <u>required</u> to have and follow a documented internal policy

P&P Guide Reference:

6.4 Matching Funds Certification and Verification



MCC Support Documentation

- Grantees should upload 100% of matching support documentation at the time the MCC form is completed and uploaded to CGMS
- MCC will not be approved until all documentation is uploaded by the Grantee and reviewed by CPRIT



P&P Guide Reference:
6.4.5 Documenting Compliance with Matching
Funds Requirements

MCC Support Documentation

Support documentation should include

- Matching Ledger
- Invoices related to Match expenses
- Proof of payment
- Applicable bank statements

P&P Guide Reference:
6.4 Matching Fund Certification and Verification



- A match deficiency may be carried forward and added to the matching fund requirement for the next project year so long as:
 - Deficiency is equal to or less than 20% of the total matching funds required for the same period; and
 - No prior matching funds deficiency



P&P Guide Reference:
6.4 Matching Fund Certification and Verification



Allowable Expenses Toward Match (not exhaustive list)

- Any expense that can be claimed for grant reimbursement
- Unrecovered indirect costs up to ten percent (10%) of the grant award amount (in addition to 5% indirect costs claimed for reimbursement) DOES NOT APPLY TO ACADEMIC INSTITUTIONS
- An employee's salary amount that exceeds CPRIT's \$200,000 cap
- Travel expenses that exceed the GSA per diem limit on hotel rates or meals
- Airfare costs that exceed coach class airfare
- Foreign travel related to CPRIT's funded project
- Taxes that are effectively user fees (hotel taxes, gasoline tax, or airfare tax)
- Immigration visa fees and associated costs for an employee listed on the PLOE
- Grantee professional association fees or dues (related to the CPRIT-funded project)
- Patent application fees and associated patent application preparation costs
- Moving costs of office furnishings or employees of companies relocating to Texas
- Security systems and ongoing security system monitoring fees for physical space



- Grantee expenditures must be direct costs spent on the CPRITfunded project or on closely related work
- 'Closely related' is interpreted as work that supports, extends, or facilitates the CPRIT project, even if the work is not supported by CPRIT funding



P&P Guide Reference:
6.4.4 Examples of Appropriate Matching
Funds Expenditures





Grant funds for the next project year will not be disbursed until the matching funds verification for the previous year and certification for the upcoming year have been approved.

Matching Compliance Certification

Q & A



Progress Reporting

Progress Reporting

Publications

- Acknowledgement of CPRIT funding if research being conducted and/or prevention project is related to CPRIT funding
- Include at least one grant ID for all publications submitted for publication

P&P Guide Reference: 5.10 Acknowledgement of CPRIT Funding

Progress Reporting

Annual and Final Progress Report Instruction

- Instructions accessible on any tab of the annual or final progress report
 - Detailed updated instructions are now available

Progress Reports





Programmatic Topics

Change of Approved Goals and Objectives



 Any changes to the scope of work or budget should be consistent with the guidance provided by reviewers and must be approved by CPRIT

P&P Guide Reference:11.3 Goals and Objectives



Prior written approval must be given by CPRIT for the transfer of an award to another Principal Investigator

Required documents for review:

- Context and justification for change
- Bio-sketch of proposed PI
- Resources (equipment, supplies, personnel) available to proposed PI
- Describe impact of change on the project goals and objectives, budget, key personnel, original timeline and CPRIT required reporting.
- Upload a revised budget and level of effort for all key personnel in an ad-hoc folder in CGMS

Change of PI/Co-Investigator

Grant Support

Points of Contact

CARS/CGMS Technical Issues?

Contact CPRIT Helpdesk

Email: Help@CPRITGrants.org

Phone:866-941-7146

Programmatic/ Content questions?

Contact the CPRIT Program Manager/Officer

Financial Questions/Issues?

Contact CPRIT Finance Manager/ Grant Accountant



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