


CANCER PREVENTION & RESEARCH  
INSTITUTE OF TEXAS

## CPRIT Grantee Annual Compliance Training

March 2022



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Product Development

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### Contact Information

<p>Cameron Eckel Staff Attorney 512-305-8495 <a href="mailto:ceckel@cpr.it.texas.gov">ceckel@cpr.it.texas.gov</a></p>	<p>Melanie Jamison Compliance Specialist 512-305-8509 <a href="mailto:mjamison@cpr.it.texas.gov">mjamison@cpr.it.texas.gov</a></p>
<p>Ed Dorotik Grant Accountant 512-305-6756 <a href="mailto:edorotik@cpr.it.texas.gov">edorotik@cpr.it.texas.gov</a></p>	<p>Stephen Nance Compliance Program Manager 512-305-8405 <a href="mailto:snance@cpr.it.texas.gov">snance@cpr.it.texas.gov</a></p>
<p>Demitra Alexander Grant Accountant 512-305-8429 <a href="mailto:dalexander@cpr.it.texas.gov">dalexander@cpr.it.texas.gov</a></p>	<p>Vince Burgess Chief Compliance Officer 512-305-8453 <a href="mailto:vburgess@cpr.it.texas.gov">vburgess@cpr.it.texas.gov</a></p>

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### Programmatic Contact – Product Development

Ken Smith  
Interim Chief Product Development Officer  
512-305-8426  
[ksmith@cpr.it.texas.gov](mailto:ksmith@cpr.it.texas.gov)

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## Training Overview

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

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## Fraud, Waste, & Abuse

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## 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](http://www.RedFlagReporting.com)

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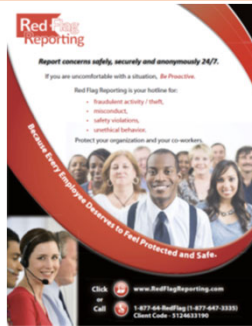
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## Fraud, Waste, & Abuse



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## Policies & Procedures

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## Sources for CPRIT Grantee Requirements

- Article III, Section 67 Texas Constitution
- Texas Health & Safety Code Chapter 102
- Texas Administrative Code Chapters 701 - 703
- Grant Contract
- Texas Grant Management Standards (formerly Uniform Grant Management Standards)

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### Grant Policies & Procedures Guide

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



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### 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



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## Administrative Rules

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### 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>

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### CPRIT's Rules

- 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

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### Why the Rules Matter to Grantees

- 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

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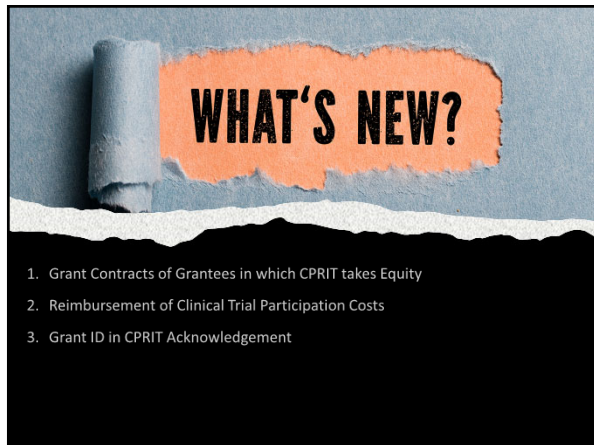
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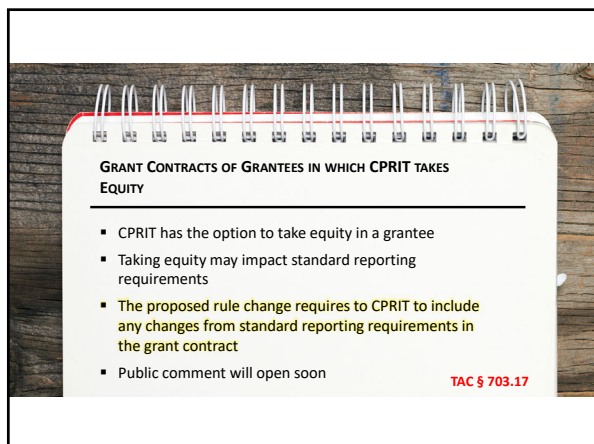
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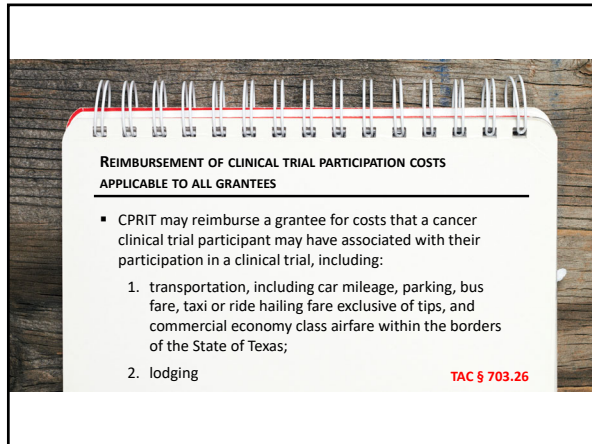
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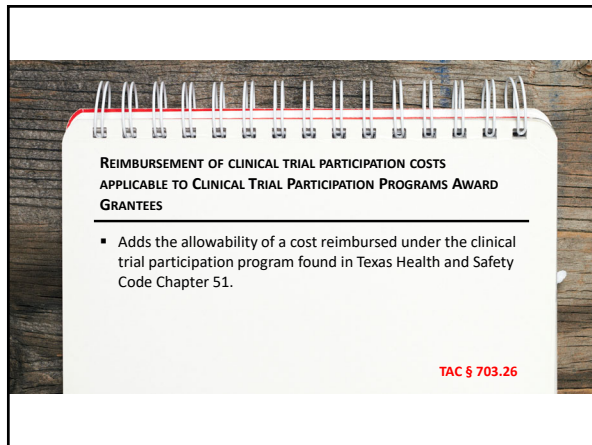
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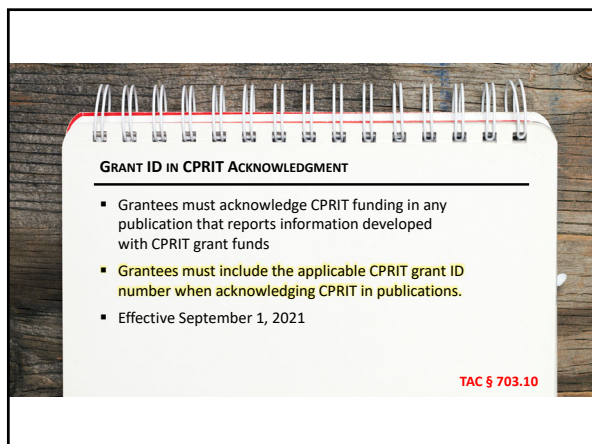
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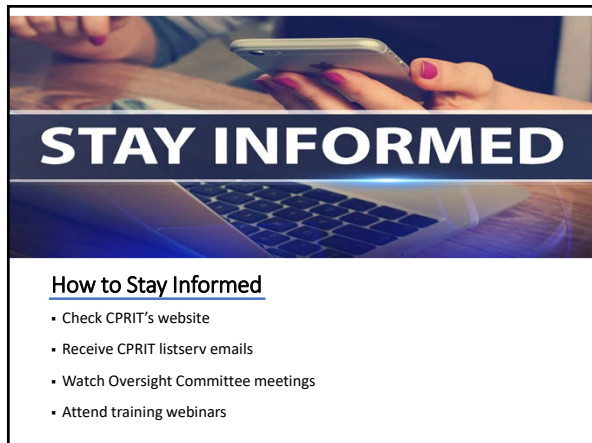
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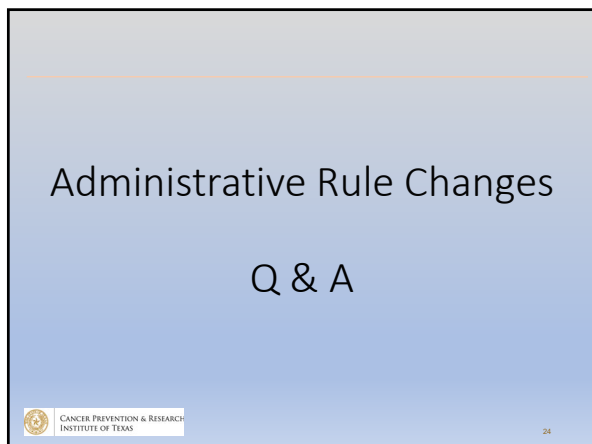
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# Financial Status Reports (FSR)

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# FSR Review and Approval Process

```
graph TD; A[Submit FSR in CGMS] --> B[Grant Accountant (GA) Review]; B --> C[2nd Level Review]; C --> D[FSR Approved in CGMS by GA];
```

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# 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

## Best Practice

- ①
- ②
- ③

P&P Guide Reference:  
9.4 Determining if a Cost is Allowable

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### FSR – Checklist

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

### Best Practice

- ①
- ②
- ③



P&P Guide Reference:  
9.4 Determining if a Cost is Allowable

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### 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

### Best Practice

- ①
- ②
- ③



P&P Guide Reference:  
9.4 Determining if a Cost is Allowable

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### FSR - Support Documentation

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

Item Total	USD	3,430.00
Gross Value		3,430.00
Net Value		3,430.00
Shipping Fee		14.50
Total Solution Cr.		1,166.00
Amount Paid	USD	2,278.52
\$2,000 charged to CPRIT avoided	USD	2,278.52

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### 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*

P&P Guide Reference:  
9.4 Determining if a Cost is Allowable



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### FSR – Examples of Unallowable Costs

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

P&P Guide Reference:  
9.4 Determining if a Cost is Allowable

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### 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





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### FSR – Checklist


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

### Best Practice

①

②

③



P&P Guide Reference:  
9.4 Determining if a Cost is Allowable

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## Financial Status Reports Q & A



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## Equipment



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### FSR – Equipment

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




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### FSR – Equipment


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

LINE	PART ID	DESCRIPTION	UM	TAX	QUANTITY	UNIT PRICE	EXTENSION
1	NS0001	NanoAssembler 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**

Other Direct Charges	
Travel	\$3,000
Equipment (Itemized)	\$50,000

Funds are requested to upgrade several instruments to optimize manufacturing and to enhance efficiency (Precision NanoSystems NanoAssembler, Agilent TapeStation, Shaking Incubator, Oxford Nanopore Technology MinION (refer to budget justification for details).


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### FSR – Equipment

- Change Not Otherwise Specified—include copy with CPRIT approval:

**Change Requests**

Grant ID: [REDACTED]  
PI/PO/CA: [REDACTED]

Grant Title: [REDACTED]  
Organization: [REDACTED]

Grant Information    Contracts    Correspondence to PI/PO/CA    Correspondence to PI/PO/CA    Budget & Financial Status Reports    Progress Reports    Change Requests

**Back to Change Requests**

**Change - Not Otherwise Specified**

\* Change Request Details: I am requesting to reallocate funds allocated to subcontracts to purchase a tissue microarray (TMA) tool.

\* Justification: The existing equipment is a 10-year old TMA tool that is outdated and inefficient. The new TMA tool will improve the quality and efficiency of the TMA process, which is critical for the success of the research project.

Download, Review, and Comments (Printable Document)


2022-02-07 09:45: Complete Web Form [REDACTED]

2022-02-07 09:45: Verify Information (pending) [REDACTED]

2022-02-07 09:45: Add Review (pending) [REDACTED]

2022-02-07 10:05: Grant Manager Review (approved) - Monique Patten (Grant Manager)

2022-02-07 10:05: Contract Manager Review (approved) - Nelson, Lisa (Contract Manager)


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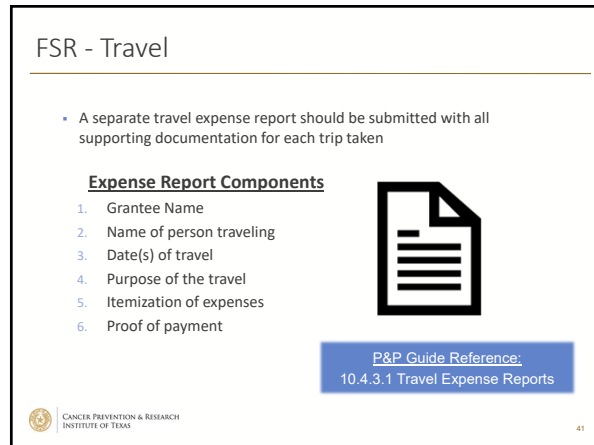
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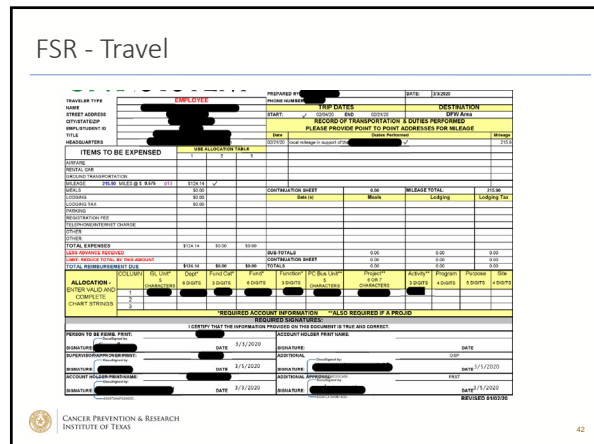
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### FSR - Travel Expense Checklist

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



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### 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



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### 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



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### FSR – Ineligible Travel Costs

- Alcohol or gratuities
- Airfare costs that exceed coach class
- Foreign travel without prior CPRI approval
- Travel outside of the grant contract effective dates
- Employee travelling 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

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### 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

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### FSR – Contractual Travel

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




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FSR - Travel  
Q & A



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Financial Status Reports –  
Personnel / Fringe



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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

Best Practice



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## FSR-Personnel/Fringe

### Timesheets / Records of Actual Time Worked

- Time sheets or other records of actual hours worked must:
- Reflect an after-the-fact distribution of the actual time spent on each activity



P&P Guide Reference:  
10.2 Personnel Expense Category

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## Personnel Level of Effort (PLOE)

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## 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

*Best Practice*



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

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## PLOE - Checklist

PLOE change requests contain all the following elements:

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

Budget Summary		Start Year	End Year	Accountant of Effort	Effort Budget Request	Personnel	Other Personnel	Information for all 3 categories
Personnel Level of Effort								
Describe Person and Other Personnel				Level of Effort (LOE)		Total Person Months Per Person		
First Name	Last Name	Role on Project		Year 1	Year 2			
	Principal Investigator	LOE (Person Months)		12	12			
		Effort on Project		0.00%	0.00%			
		Person Months		0.00	0.00	0.00		
		Total Person Months Per Person						
	PI/COPI	LOE (Person Months)		12	12			
		Effort on Project		0.00%	0.00%			
		Person Months		0.00	0.00	0.00		
		Total Person Months Per Person						
	Senior Research Associate	LOE (Person Months)		12	12			
		Effort on Project		0.00%	0.00%			
		Person Months		0.00	0.00	0.00		
		Total Person Months Per Person		1.20	1.20	0.00		

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

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## PLOE

**reminder**

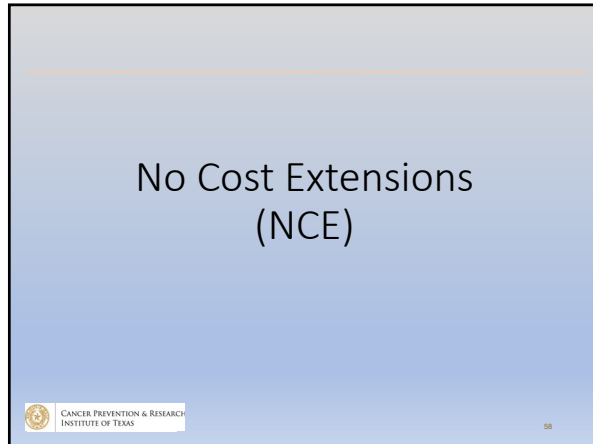
When grant moves to closeout status from active status (equivalent to the contract end date), the PLOE **cannot** be revised in CARS-CGMS, and any expenses related to personnel not listed on the PLOE **will not be reimbursed**

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## Personnel Level of Effort Form

### Q & A

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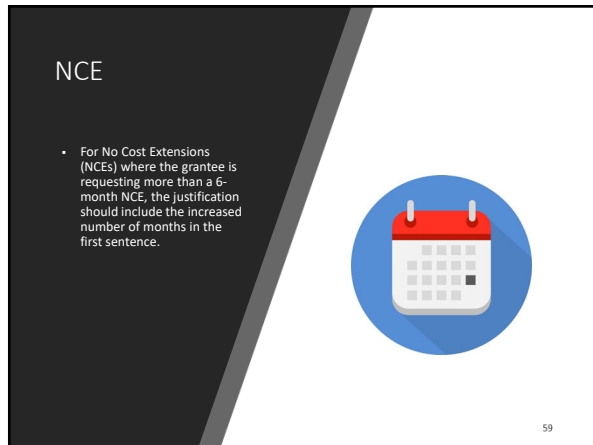
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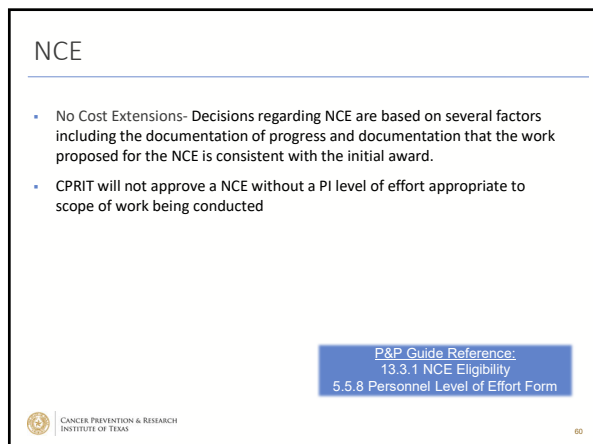
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## NCE

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

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## NCE

Other Personnel	Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person
Blank on Project	Type Appl. (months)	0	0	0	0	
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
	Type Appl. (months)	12	12	12	12	
Co-Program Director	Effort on Project	0.00%	0.00%	0.00%	0.00%	
	Person Months	0.00	0.00	0.00	0.00	0.00
	Type Appl. (months)	0	0	0	0	
Project Asst.	Effort on Project	0.00%	0.00%	0.00%	0.00%	
	Person Months	0.00	0.00	0.00	0.00	0.00
	Type Appl. (months)	0	0	0	0	
Program Asst.	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
	Type Appl. (months)	12	12	12	12	
Co-Program	Effort on Project	0.00%	0.00%	0.00%	0.00%	
	Person Months	0.00	0.00	0.00	0.00	0.00
	Type Appl. (months)	0	0	0	0	
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
	Type Appl. (months)	0	0	0	0	
Project Assistant	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
	Type Appl. (months)	12	12	12	12	
PI/PO/CI	Effort on Project	50.00%	50.00%	50.00%	0.00%	
	Person Months	6.00	6.00	6.00	0.00	18.00
	Type Appl. (months)	0	0	0	0	
Project Assistant	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
	Type Appl. (months)	0	0	0	0	
Total Person Months Per Year		7.00	8.00	22.00	N/A	45.00


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## Matching Compliance Certification (MCC)


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## 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

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## 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

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## MCC

- 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 References:**  
6.4 Matching Fund Certification and Verification

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## MCC

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

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## MCC

- Grantee expenditures must be direct costs spent on the CPRIT-funded 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

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## MCC



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.

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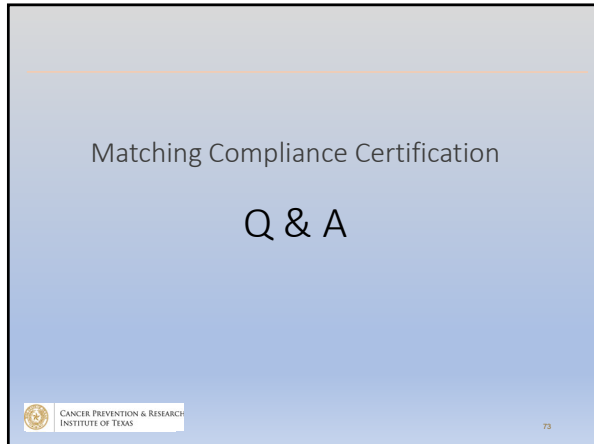
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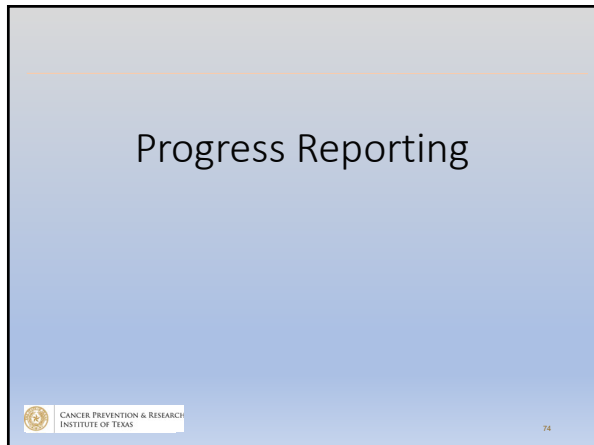
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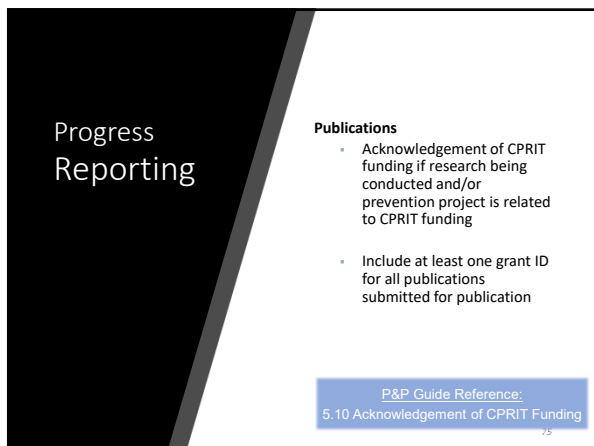
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## Progress Reporting

### 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

Annual Progress Report   Grant Year Ending 30 Aug 2021   [Back to Progress Reports](#)   [Print to PDF](#)   [Instructions](#)

**Key Accomplishments**   Summary of Goals and Objectives   Client Stories and Quotes   Materials Produced   Publications

**\* Key Accomplishments:**  
Provide a numbered list of up to 8 key accomplishments during the reporting period.



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## Programmatic Topics



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## Texas Location Criteria



Product Development Grantees must maintain its principal place of business in the State of Texas for a period of three years **after** the final payment of the Grant funds is made by CPRIT.



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## Texas Location Criteria

Must demonstrate and maintain at least 4 of the 7 criteria throughout the entire grant period.

- The U.S. headquarters is physically located in Texas
- The Chief Executive Officer resides in Texas
- A majority of the company's personnel, including at least two other C-level employees (or equivalent) reside in Texas
- Manufacturing activities take place in Texas
- At least 90% of Grant Award funds are paid to individuals and entities in Texas, including salaries and personnel costs for employees and contractors
- At least one clinical trial site in Texas
- Collaboration with a medical research organization in Texas, including a public or private institution of higher education



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## Advance Payments

- CPRIT will advance up to 50% of the project year budget at one time
- Must expend at least 90% of the grant award funds in a tranche before the additional funds will be advanced
- 10% of grant award funds will be withheld from a grantee until the grantee has completed the contract close out process and all grant reports have been submitted to and approved by CPRIT

P&P Guide Reference  
8.2.2 Advance Funds Method  
13.6 Final 10% of Grant Funds for  
Grantees Receiving Advance Payments

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## Advance Payments

- Advancements are requested by utilizing the "Advancement of Funds Form" option on the "Change Request" tab in CGMS



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### 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

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### Grant Support



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### Points of Contact

**CARS/CGMS Technical Issues?**  
Contact CPRIT Helpdesk  
Email: [Help@CPRITGrants.org](mailto: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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### Contact Information

Cameron Eckel Staff Attorney 512-305-8495 <a href="mailto:ceckel@cpritchexas.gov">ceckel@cpritchexas.gov</a>	Melanie Jamison Compliance Specialist 512-305-8509 <a href="mailto:mjamison@cpritchexas.gov">mjamison@cpritchexas.gov</a>
Ed Dorotik Grant Accountant 512-305-6756 <a href="mailto:edorotik@cpritchexas.gov">edorotik@cpritchexas.gov</a>	Stephen Nance Compliance Program Manager 512-305-8405 <a href="mailto:snance@cpritchexas.gov">snance@cpritchexas.gov</a>
Demitra Alexander Grant Accountant 512-305-8429 <a href="mailto:dalexander@cpritchexas.gov">dalexander@cpritchexas.gov</a>	Vince Burgess Chief Compliance Officer 512-305-8453 <a href="mailto:vburgess@cpritchexas.gov">vburgess@cpritchexas.gov</a>



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## CPRIT Grantee Annual Compliance Training

March 2022



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Product Development

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