

CPRIT Grantee Annual Compliance Training

October 2022



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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



- 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)



Sources of CPRIT Grantee Requirements

Most frequently referenced requirements:

- Texas Administrative Code
 Chapters 701 703
- Grant Contract



Grant Policies & Procedures Guide

- Combines grantee requirements from the various sources into one document
- Commonly referred to as the "P & P Guide"
- Available on CPRIT's website
- Periodically updated



Remember
The P&P Guide
is only a *guide*

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

Administrative Rules



Why the Rules are Important for Grantees

- CPRIT's rules contain many grantee requirements
- Changes to grantee requirements found in the rules happen through the rulemaking process
- The rules are the most cited source in the Grant Policies & Procedures Guide



What are the administrative rules?

- Located in Texas Administrative Code (TAC).
- TAC includes all Texas state agency rules.
- Changes to the rules occur through the official rulemaking process.
- TAC is compiled, indexed, and published by the Texas Secretary of State (https://www.sos.texas.gov/tac/index.shtml)

CPRIT's Chapters in TAC

- 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



How Rule Changes Occur

- Proposed rule changes are announced at a quarterly Oversight Committee meeting.
- Rule changes are made available for public comment & on CPRIT's website.
- 3. The Oversight Committee considers final adoption at the following open meeting.
- 4. Texas Administrative Code text is updated with the adopted rule changes.



How to Stay in the Know

- ☑ Check CPRIT's website;
- ☑ Receive CPRIT listserv emails;
- ☑ Attend training webinars





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Apply for Funding

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About Us

Home > About Us > Statute, Rules and Grant Policies Guide

Statute, Rules and Grant Policies Guide

Statutes

Texas Health and Safety Code Chapter 102

Article III of Texas Constitution establishing CPRIT

Dulo

Texas Administrative Code, Title 25, Chapters 701 - 703

Current Rulemaking Project

At its February 16, 2022, meeting, the Oversight Committee approved the release of proposed changes to existing agency rules.

If CPRIT takes equity in a grantee, the proposed amendment to § 703.17 would require the agency to specify in the grant contract any changes from standard grantee reporting requirements and associated consequences for a grantee failing to timely report. When CPRIT takes equity in a grantee, issues related to equity ownership may affect certain standard grantee reporting requirements, such as the schedule for the grantee to certify and verify its matching funds obligation.

Written comments may be submitted through April 4, 2022, to CPRIT's General Counsel, Kristen Doyle, by fax (512/475-2563); by email (kdoyle@cprit.texas.gov); or by mail to the Cancer Prevention and Research Institute of Texas, P.O. Box 12097, ATTN: Rulemaking Project, Austin, Texas, 78711.

The Oversight Committee expects to consider a final order that reflects the comments received on the proposed rule and any recommended changes at their meeting on May 18, 2022.

Proposed change to Texas Administrative Code Title 25, Chapter 703

Recently Adopted Rule Changes

At its February meeting, the Oversight Committee also approved the final adoption of recent changes to § 703.26 that were initially presented at the November 18, 2021, meeting. The amendments to § 703.26 add parking as a reimbursable clinical trial participation cost, correct the statutory reference of the Cancer Clinical Trial Participation Program to Texas Health and Safety Code Chapter 51, and correct a grammatical error.

Grant Policy Guides

- <u>CPRIT Policies and Procedures Guide</u>
 The current version of the Grantee Policies & Procedures Guide is dated December 2021.
- Uniform Grant Management Standards

About Us

Ethics and Compliance

Oversight Committee

Advisory Committees

Executive Team & Staff

Employment Opportunities

Procurement

CPRIT's website is the best place to find the current rules and P&P

Guide

https://cprit.texas.gov/aboutus/statute-rules-and-grant-policiesguide/

Recent Administrative Rule Changes

Corrections to Financial
Status Report (FSR)
Supporting
Documentation

Eligible Grantee Matching Funds Texas Grant Management Standards Corrections to Financial Status Report (FSR) Supporting Documentation

§703.24(a)(5)

- Requires a grantee to submit corrections to FSR supporting documentation within five (5) business days after CPRIT makes the request.
- If a grantee does not meet the deadline then CPRIT may disapprove the FSR.
- Public comment period closed on October 3rd
- The Oversight Committee will consider adopting this rule change at the November 16 meeting.

Eligible Grantee Matching Funds

§ 703.11(c)(7)

- Adds relocation costs to Texas as a source of encumbered funds that a grantee may use to fulfill their matching funds requirement.
- Public comment period closed on October 3rd
- The Oversight Committee will consider adopting this rule change at the November 16 meeting.

Texas Grant Management Standards

§§ 703.10, 703.15, and 703.26

- Replaces references to Uniform Grant Management Standards with Texas Grant Management Standards (TxGMS) in CPRIT's administrative rules.
- CPRIT looks to TxGMS when there is not an agency-specific administrative rule.
- Public comment period closed on October 3rd
- The Oversight Committee will consider adopting this rule change at the November 16 meeting.

Administrative Rule Changes

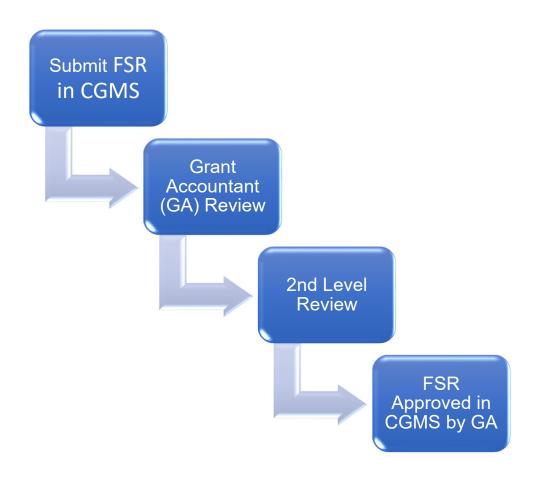
Q & A



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



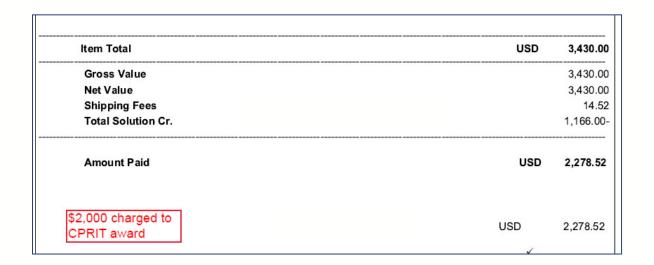
FSR — Checklist

- 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 <u>approved</u>
- 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 <u>before</u> deadline



FSR — Checklist

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



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

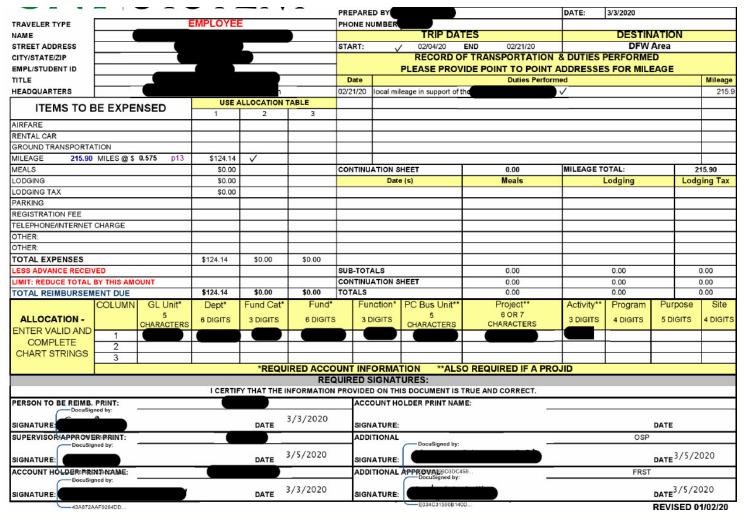
- 1. Grantee Name
- 2. Name of person traveling
- 3. Date(s) of travel
- 4. Purpose of the travel
- 5. Itemization of expenses
- 6. Proof of payment



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



FSR-Personnel/Fringe

Timesheets / Records of Actual Time Worked

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



P&P Guide Reference:

10.2 Personnel Expense Category

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 and conference fees are listed on the PLOE



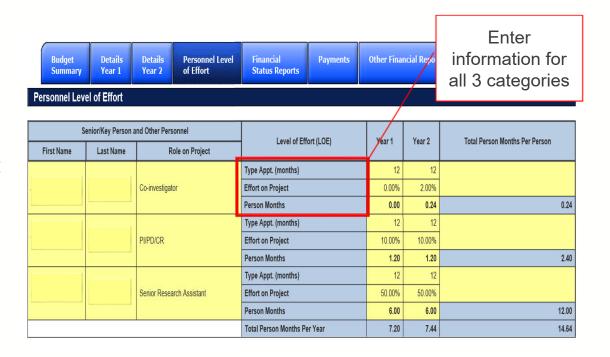
P&P Guide Reference: 5.5.8 Personnel Level of Effort Form



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		Louis of Effect (LOE)	Year 1	Year 2	Year 3	Year 4	Year 5	Total Person Months Per Person	
First Name	Last Name	Role on Project	Level of Effort (LOE)	Year 1	rear 2	rear s	fear 4	Tear o	lotal 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)	Vanad					
Role on Project		Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person	
	0	0	12	12			
Program Coordinator	Effort on Project	0.00%	0.00%	12 . 0%	0.00%		
	Person Months	0.00	0.00	12.00	0.00	12.00	
Type Appt. (months)		12	12	12	12		
Co-Program Director	Effort on Project	8.00%	8.5 %	8.00%	0.00%		
	Person Months	0.96	0.96	0.96	0.00	2.88	
	Type Appt. (months)	0	0	4	12		
Project Assistant Effort on Project		0.00	0.00%	60.00%	0.00%		
	3.00	0.00	2.40	0.00	2.40		
Exam	0	12	12	12			
5	ple of NCE	0.00%	10.00%	10.00%	0.00%		
which	n resulted in	0.00	1.20	1.20	0.00	2.40	
WILICI	i resulted iii	12	12	12	12		
Co-Pi	8.00%	8.00%	8.00%	0.00%			
a rea	r 4 – auto-	0.96	0.96	0.96	0.00	2.88	
	1.4	0	0	4	12		
Progr DODU	lates with	0.00%	0.00%	100.00%	0.00%		
			0.00	4.00	0.00	4.00	
zeros		0	0	4	12		
Proje		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	
Type Appt. (months)		0	0	1	0		
Project Assistant	Effort on Project	0.00%	0.00%	100.00%	0.00%		
	0.00	0.00	1.00	0.00	1.00		
	Total Person Months Per Year			32.52	N/A	49.56	



Matching Compliance Certification (MCC)

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)
- Short-term travel 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

Texas Location Criteria



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

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



Texas Location Criteria

Documentation to demonstrate compliance may include:

- Fully executed headquarters' lease agreement
- Home/apartment lease agreement
- Texas Drivers Licenses
- Utility bills
- Paycheck stubs
- Fully executed contracts with manufacturers, clinical trial sites, or medical research organizations in Texas
- Texas Incorporation documentation

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

Advance Payments

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



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

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



Contact Information

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