CPRIT Grantee Annual Compliance Training

Cancer Prevention & Research Institute of Texas

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Training Overview

- Introductions
- FWA Reporting
- Recent Administrative Rule Changes
- Policies and Procedures Guide Overview
- 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



Administrative Rules



How to Stay in the Know

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

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



CPRIT Policies & Procedures Guide



Sources of 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)





News & Events

Home Our

Apply for Funding

Grants Funded

Grants Process

About

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

Rules

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 Guida

CPRIT Policies and Procedures Guide

The control version of the Control 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/



Policies & Procedures Guide Overview

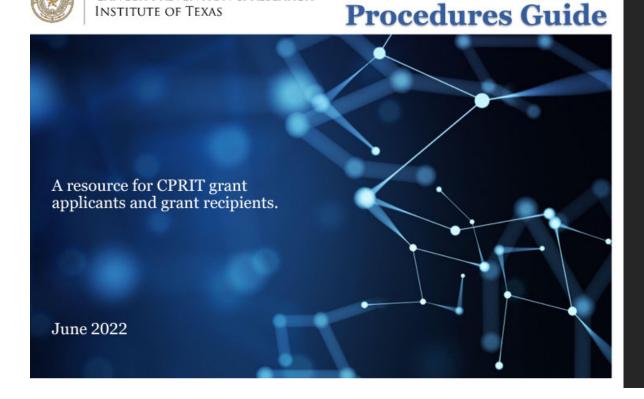


Table of Contents

Grant Policies and Procedures Guide	1
Table of Contents	1
Tables and Figures	3
Version Control	4
Acronyms	7
Chapter 1: Introduction	9
Chapter 2: Applying for a CPRIT Grant	12
Chapter 3: Review Process	24
Chapter 4: Approving Grant Award Recommendations	44
Chapter 5: Grant Contracts	48
Chapter 6: Required Grant Reports	66
Chapter 7: Financial Policies Applicable to CPRIT Grants	87
Chapter 8: Disbursement of Grant Funds	98
Chapter 9: Allowable Costs	104
Chapter 10: Grantee Budget/Expense Categories and Required Documentation	113
Chapter 11: Grantee Monitoring for Progress and Compliance	133
Chapter 12: Grantee Audits	139
Chapter 13: Termination, Extension, and Closeout of Grant Contracts	151
Glossary	158
Appendix	169

Policies & Procedures Guide

CPRIT Policies and Procedures Guide Chapters Covered Today

Chapter	Topic
5	Grant Contracts
6	Required Grant Reports
9	Allowable Costs
10	Grantee Budget/Expense Categories and Required Documentation
13	Termination, Extension, and Closeout of Grant Contracts

Chapter 5: Grant Contracts

Personnel Level of Effort (PLOE)



Polling Question

The personnel level of effort (PLOE) form should be updated once a year.

True or False

Answer: False

Polling Question

Are employees whose salaries and benefits are covered by the grant required to be listed on the PLOE?

Answer: YES

PLOE Checklist

- PLOE <u>must be updated prior</u> to submitting FSR
- Each employee with salary/fringe has Level of Effort for current award year
- All employees with travel, tuition, stipends and conference fees are listed on the PLOE



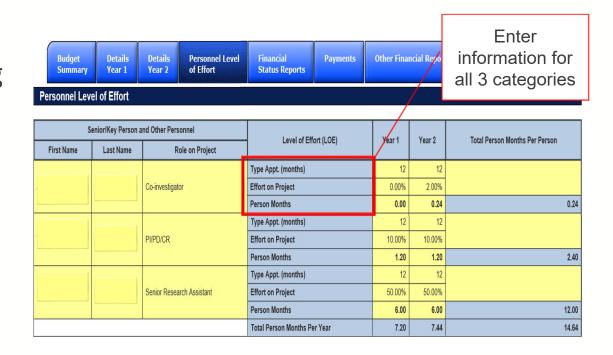
P&P Guide Reference: 5.5.8 Personnel Level of Effort Form



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 Recap



- Update PLOE prior to submitting FSR
- When grant moves to <u>closeout status</u>
 - PLOE cannot be revised in CGMS
 - Expenses related to personnel not updated on the PLOE will not be reimbursed

Personnel Level of Effort Q & A

Chapter 6: Required Grant Reports



Polling Question

All CPRIT required reports should be submitted on an annual basis?

True or False

Answer: False

Reporting Requirements

Annual





- HUB/Texas Suppliers Report
- Matching Compliance Certification
- Annual Progress Report
- Single Audit Determination Form
- Audit Report



Quarterly

- Financial Status Report
- Quarterly Progress Report



Periodic

Interim/ Tranche Report (PD Grantees)

Chapter 5: Grant Contracts

Chapter 6: Required Grant Reports

Progress Reports



Progress Reports

Ensure that Progress Reports contain accurate and complete impact data.

This includes, but is not limited to:

- Publications
- Follow-on funds
- Patents
- Clinical trials
- Research training award data

Progress Reports – Common Errors

Incomplete report

Overlap with previous reports

Duplicate entries (publications, jobs, etc.)

Inconsistencies between narrative and data entered

CPRIT Acknowledgment

Printed and visual materials related to CPRIT funding should include CPRIT acknowledgment and grant ID.

Publications not funded by CPRIT, should not be included in the progress report

CPRIT Acknowledgment

This work was conducted with support from Cancer Prevention Research Institute of was supported by a Career Development Award (CDA 11-217) from the U.S. Department of Veterans Affairs. The content is solely the responsibility of the authors and does not

necessarily represent the official views of the National Institutes of Health.

P&P Guide Reference: 5.10 Acknowledgement of CPRIT Funding

Chapter 9: Allowable Costs

Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Financial Status Report (FSR)



Polling Question

For expenses submitted "outside the period," a justification memo or letter should be included with the FSR supporting documentation.

True or False

Answer: True

Polling Question

How many days does a grantee have to respond to a request for additional FSR documentation?

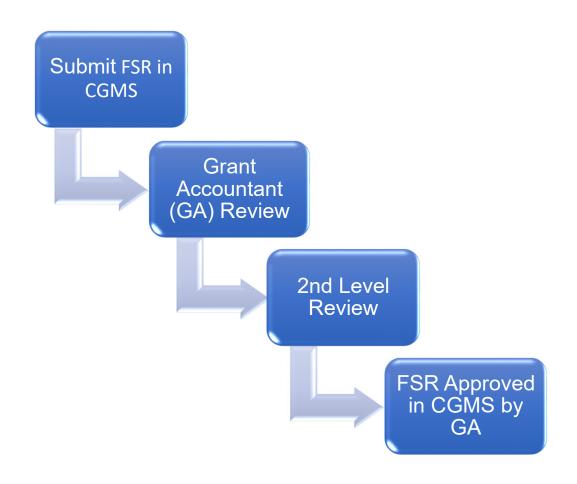
- A. 21 days
- в. 5 days
- c. 30 days

Answer: B



Fiscal Quarter/ Reporting Period	FSR Due Date	Last Day of Grace Period
Sept 1 – Nov 30	Feb 28	Mar 30
Dec 1 – Feb 28	May 29	June 28
Mar 1 – May 31	Aug 29	Sept 28
June 1 – Aug 31	Nov 29	Dec 29

FSR Review and Approval Process





FSR Required Supporting Documentation

Every Financial Status Report (FSR) must include a summary report of expenses generated directly from an accounting system or itemized on an Excel spreadsheet, as well as documentation to support grant costs paid during the current reporting period.

The report must contain the following information:

- expense categories
- itemized expenses
- description of items
- date paid
- amount paid with expense totals broken down by category

FSR Required Supporting Documentation

If the date paid is not found in the summary report, it should be noted on invoices.

A payment claimed for a period prior to the current period should be accompanied by an **Out of Period (OTP)** letter or memo explaining why the payment was not claimed in the appropriate period.

CPRIT Grant Policies & Procedures Guide Appendix

Appendix

Financial Status Report Supporting Documentation

Frequently Asked Questions

Program Priorities

Revenue Sharing

Review Processes



Personnel	 Personnel cost report for the pay period including the names, titles, and pay for each individual whose salary is charged to the grant. Names and titles must match the Personnel Level of Effort Form (PLOE) in CGMS Changes to personnel must be submitted on the Personnel Level of Effort change request in CGMS and approved by CPRIT. Non - academic institutions must provide copies of payroll ledger information as well as supporting documentation such as timesheets and payroll statements.
Fringe Benefits	 Summary of benefits paid including employee name, type of benefit, and the amount with a total Grantees reporting pooled fringe benefits in accordance with a federally approved fringe benefit rate agreement may report a total fringe amount by employee without categorization of each type of benefit. Provide a copy of the agreement that was in effect during the FSR reporting period and the agreement must describe the categories of benefits included in the pool.

	Employee travel reimbursement request form To be eligible for grant reimbursement, employee names must match those on the PLOE					
	Documentation to support all travel costs.					
	o mileage logs					
	o hotel receipts					
	o airfare receipts					
Travel	 GSA rate printout for travel location zip code(s) 					
	o public transportation receipts					
	 meal receipts (not required if traveler claims per diem for meals) 					
	o conference/seminar registration					
	o copy of CPRIT approval for international travel expenses (initial budget justification or change request)					
	 Grantees must exclude tips and alcohol (unallowable expenses) from any travel reimbursement charged to the grant. 					
	Travel costs charged to the grant must be consistent with the State of Texas TexTravel Guide, https://fmx.cga.state.tx.us/fmx/travel/textravel/index.ghg.					

Equipment	 Copy of the vendor invoices for all equipment costs Purchase orders and packing slips are not acceptable forms of supporting documentation Prior to the actual procurement of the item, equipment purchases must be approved by CPRIT. Copy of CPRIT approval (initial budget justification or change request) 			
Supplies	 Summary report with a description of the supply purchased, vendor name, date paid, and amount paid. Central supply department transactional document Academic Institution grantees must provide a copy of the vendor invoice for any supply purchase of \$750 or more. Non - academic institutions must provide invoices to support all expenses regardless of amount. 			

Contractual	 Subcontractor invoices for all contractual expenses (service contracts and subawards) Subcontractor expenses claimed against the grant must adhere to the same cost principles regarding allowable and nonallowable expenses as any other expense claimed by the grantee. It is the grantee's responsibility to apply these cost principles, and grantees may be asked to provide a copy of the subcontractor contract in some cases.
Other	 Summary report with a description of the item purchased, date of purchase, date paid, and amount paid for any expenses that cannot be applied to any of the expense categories above. Central supply department transactional document Academic Institution grantees must provide a copy of the vendor invoice for any supply purchase of \$750 or more. Non - academic institutions must provide invoices to support all expenses regardless of amount.
	letailed information about required documentation for costs claimed on a FSR, grantees should refer to ster IO of CPRIT's <i>Policies and Procedures Guide</i> .

FSR Submissions Checklist



Expenses are paid within FSR period



Payment date is included for all transactions



FSR amounts match ledger totals by expense category



Supporting documents are scanned in the same order as the transaction listing



FSR Submissions Checklist



Supporting documents are legible



Invoice amounts match amounts shown on the ledger and partial charges are explained on the invoice



Expenses are allowable and properly categorized



A memo justification for cost out of period is provided



FSR – Examples of Unallowable Costs



INDIVIDUAL PROFESSIONAL MEMBERSHIP FEES



ALCOHOL



TIPS & GRATUITIES



BAD DEBT



LOBBYING COSTS



ENTERTAINMENT



Mis-categorization of expenses

Reimbursement amount is not clear

Documents are not clearly labeled

Invoices lack detailed purchase description

Lack of response from grantee for additional information

Miscategorization of Expenses

Supplies Expense

Equipment with unit cost of less than \$5000

Lab materials

Office Supplies

Other Expense

Lab care (mice per diem)

Copying services

Publication fees

Equipment warranties and service contracts

Conference/registration fees (not associated with travel)

• Conference/registration fees that are paid as part of travel expenses are reimbursable on a travel voucher

Shipping services (FedEx, UPS), etc.



Reimbursement Amount Not Clear

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 Fees			14.52
Total Solution Cr.			1,166.00
Amount Paid		USD	2,278.52
\$2,000 charged to	Credit Card Charge Details: MC ****5345	USD	2,278.52



Documents Not Clearly Labeled

Individual items referenced in GL with the same letter:

TOANEL	10.00	T.	0/24/2022
TRAVEL	19.25	1	8/24/2022
TRAVEL	23.10	1	8/24/2022
TRAVEL	30.00	1	8/24/2022
TRAVEL	24.48	1	8/24/2022
TRAVEL	✓ 989.00	L	8/24/2022
TRAVEL	725.00	L	8/24/2022
TRAVEL	18.70	l .	8/24/2022
TRAVEL	17.60	L	8/24/2022
TRAVEL	20.16	l .	8/24/2022
TRAVEL	33.52	L	8/24/2022
TRAVEL	29.92	L	8/24/2022
TRAVEL	46.20	1	8/24/2022
TRAVEL	6.38	J	8/24/2022
TRAVEL	4.93	J	8/24/2022
TRAVEL	790.30	J	8/24/2022
TRAVEL	36.91	J	8/24/2022
TRAVEL	9.25	J	8/24/2022
TRAVEL	5.89	J	8/24/2022
TRAVEL	14.84	J	8/24/2022
TRAVEL	33.53	J	8/24/2022
TRAVEL	9.25	J	8/24/2022

Documents Not Clearly Labeled

Items individually referenced

				,			
Travel Out of State	TRAVEL	251.61	D1	6/1/2022	CITIBANK N.A	4/26/2022	5/27/2022
Travel Out of State	TRAVEL	25.00	D1 y	6/1/2022	(1/0/1900	5/16/2022
Travel Out of State	TRAVEL	600.63	D2√	6/8/2022		6/2/2022	6/6/2022
	Disallowed, GL error	(0.01)	D2 _V /				
Travel Out of State	TRAVEL	27.73	D3V	6/8/2022		6/2/2022	6/6/2022
	Disallowed, unknown fees	(12.63)	D3 V				
Travel Out of State	TRAVEL	33.26	D4 /	6/8/2022		6/2/2022	6/6/2022
	Disallamed malesame fees	(0.03)	_n/V				
ravel Out of State	TRAVEL	11.88	D5 V	6/8/2022		6/2/2022	6/6/2022
	Disanowed up	(1.00)	DOY				
Travel Out of State	TRAVEL	11.88	Dev	6/8/2022		6/2/2022	6/6/2022
	Disallowed tip	(1.00)	DeV				
	Total Travel	939.32	ÇV				
	Total GL	38,636.55					



Invoices Lack Detailed Description

Unclear description:



Clear description:





Lack of response from grantee for additional information

Texas Administrative Code

TITLE 25 HEALTH SERVICES

PART 11 CANCER PREVENTION AND RESEARCH INSTITUTE OF TEXAS

CHAPTER 703 GRANTS FOR CANCER PREVENTION AND RESEARCH

RULE §703.24 Financial Status Reports

(5) The Institute may request in writing that a Grant Recipient provide more information or correct a deficiency in the supporting documentation for a Financial Status Report. If a Grant Recipient does not submit the requested information within five (5) business days after the request is submitted, the Financial Status Report may be disapproved by the Institute.

Financial Status Reports Q & A

Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Equipment Expense Category



Polling Question

Can equipment, not listed in original application, be purchased in lieu of approved equipment?

Answer: Yes

CPRIT approval must be obtained prior to purchasing the replacement equipment via a Change Not Otherwise Specified (CNOS) change request in CGMS.

Polling Question

Equipment service agreements cannot be purchased during a NCE.

Answer: False

Service agreements can be purchased but the cost must be prorated if the service agreement extends beyond the new end date of the grant.

Equipment

For all equipment expenses, the grantee **must** include acceptable documentation of CPRIT approval.

Acceptable documentation includes:

- Initial Budget Justification with equipment items highlighted
- Approved change request



Acceptable Equipment Documentation



Acceptable Equipment Documentation

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

Other Direct Charges			
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		

Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Travel Expense Category



Polling Question

International travel requires prior approval if it is not included in the original budget justification.

• True or False

Answer: True

Polling Question

Should meal receipts be submitted if claiming per diem?

Answer: No

Meal receipts are not required when claiming per diem

Travel Expense Report Requirements

For each trip taken, a separate travel expense report with all supporting documentation should be submitted, which should include:

- Grantee Name
- Traveler's Name
- Date(s) of travel
- Purpose of the travel
- Itemization of expenses
- Proof of payment

Travel Expense Checklist



All travelers <u>must</u> be listed on the PLOE



Receipts should be legible and in same order as GL



Unless using per diem, meal expenses should be supported by itemized receipts.



Clearly identify meals for reimbursement on split receipts



Group and day trip meals are not allowed

Travel Expense Checklist



Grantee <u>must</u> include documentation of CPRIT approval for all international travel expenses



GSA rate printout for the travel location(s) zip code should be attached



Mileage calculations and transportation receipts included



Gratuities and alcohol should not be excluded

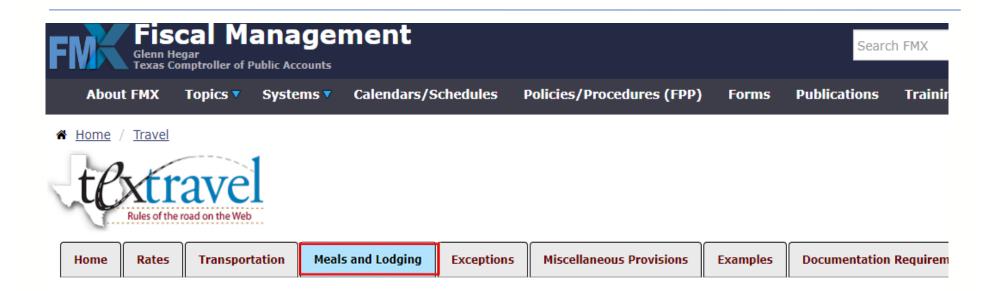


Meals and lodging expenses are within GSA limits



Include a calculation to show that hotel room rates and taxes are prorated when they exceed the per diem

Textravel – Hotel Occupancy taxes Maximum Reimbursement



Meals and Lodging

Meals

Lodging

Hotel occupancy taxes

Exception for employees of educational organizations

Exception for certain state officers or employees

Exception for travel outside

Hotel occupancy taxes

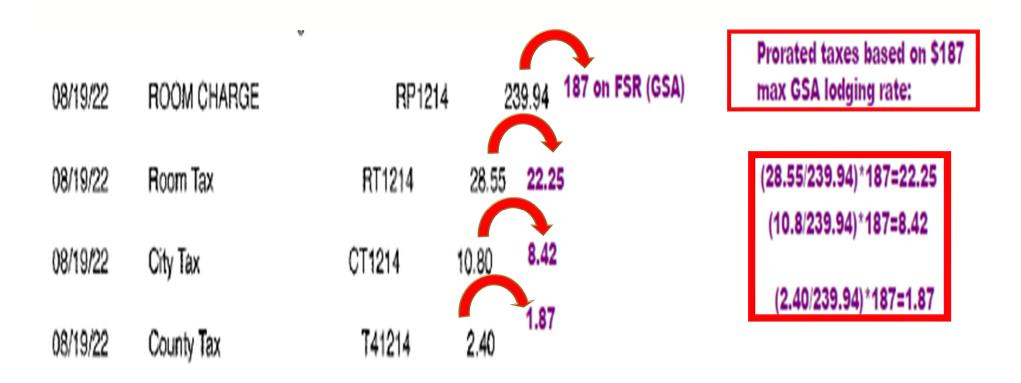
Maximum reimbursement

When a **state employee** is entitled to be reimbursed for payment of a hotel occupancy or similar tax and the lodging amount incurred exceeds the maximum allowable lodging rate, the following calculation methods for the tax reimbursement must be used:

If the tax is calculated as a percentage of the lodging rate, then the amount of the reimbursement is equal to the percentage multiplied by the maximum that may be reimbursed to the employee for lodging expenses.



Prorated hotel room rate and taxes when they exceed the per diem



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)

Foreign Currency

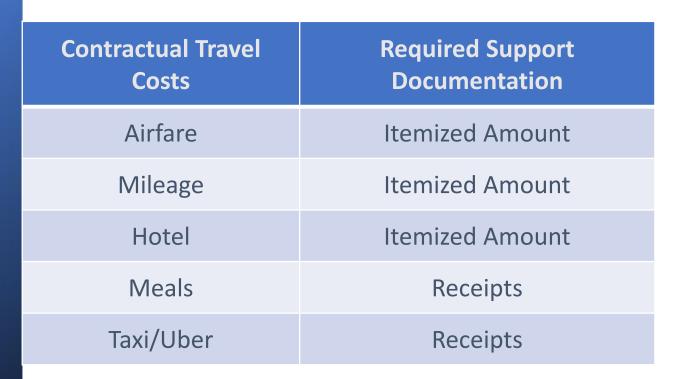


Foreign currency travel expenses **must** be:

- converted to US dollar amounts before submitting to CPRIT, and
- documentation of the exchange rate used for the conversion <u>must</u> be included with supporting documents.

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

Contractual Travel



Travel Expenses Recap



- Submit a <u>complete</u> travel expense report for each traveler and include all supporting documents
- Travel receipts should be in same order as GL
- Submit copy of GSA meals and lodging rates with supporting documents
- Submit foreign travel approval with supporting documents
- Convert foreign travel currency expenses to USD and include exchange rate used

Travel Expenses Q & A

Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Personnel / Fringe Expense Category



FSR Personnel & Fringe

- Payroll ledger included and it ties to ledger
- All employees are listed on PLOE with Level of Effort for current award year
- Fringe expenses are listed by category for each employee
 - Exception: A copy of the agreement that describes the categories of fringe included in the pool must be provided if a grantee uses pooled fringe in accordance with a federally approved rate agreement.



Chapter 13: Termination, Extension, and Closeout of Grant Contracts

No Cost Extensions (NCE)



No Cost Extension (NCE)

- Request must be submitted at least 30 days prior to termination date but not more than 180 days prior
- More than 6 months can be requested. The increased number of months should be mentioned in the first sentence of the justification
- There is no automatic approval. NCEs are based on several factors including;
 - documentation of progress
 - documentation that the work proposed for the NCE is consistent with the initial award
 - grantee must be in good fiscal and programmatic standing
- The PI must exhibit measurable effort during an approved NCE

No Cost Extension (NCE)

For Approved NCEs

- The final report date for NCEs will change, but an additional annual report as well as quarterly reports are required until the contract ends
- You must update the PLOE for the extension time period because it defaults to zero for No Cost Extensions (NCEs)

No Cost Extension PLOE Update

Other Personnel		Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person
Role on Project							
Program Coordinator		Type Appt. (months)	0	0	12	12	
		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	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
Program Ass				12		12	
	whic	h resulted in a	0094	10.00%	10.00%	0.00%	
	Voar	Year 4 – automaticall		1.20	1.20	0.00	2.40
		4 – automatican	12	12	12	12	
		lates with zeros	.00%	8.00%	8.00%	0.00%	
			0.96	0.96	0.96	0.00	2.88
Program Coordinator		Type Appt. (months)	0	0	4	12	
		Effort on Project	0.00%	0.00%	100.00%	0.00%	
		Person Months	0.00	0.00	4.00	0.00	4.00
Project Assistant		Type Appt. (months)	0	0	4	12	
		Effort on Project	0.00%	0.00%	100.00%	0.00%	
		Person Months	0.00	0.00	4.00	0.00	4.00
PI/PD/CR		Type Appt. (months)	12	12	12	12	
		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

NCE – Frequently Asked Questions

What research can be conducted during an NCE?

<u>Answer:</u> Only goals and objectives that have been approved but have not yet been completed can be conducted during an NCE.



Programmatic Topics



Program Manager Q & A

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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CPRIT Grantee Annual Compliance Training

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