CPRIT Grantee Annual Compliance Training

June 2023



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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

Definition and Use of "Scope of Work" Corrections to Financial
Status Report (FSR)
Supporting
Documentation

Eligible Grantee Matching Funds

Definition of "Scope of Work"

§ 701.3(63)

Proposed rule change

Public comment period is open.

- Scope of Work: the goals and objectives or specific aims and sub aims, if appropriate, of the Cancer Research or Cancer Prevention project, including the timeline and milestones to be achieved.
- RFA will specify applicable terminology for a grant mechanism.



Public comment period is open through July 3rd.



The Oversight Committee will consider final adoption at the August 16th meeting.

Use of "Scope of Work"

§§ 701.3(29), 703.6, 703.7, 703.10, 703.21, 703.25

Proposed rule change

Public comment period is open.

 These are nonsubstantive changes that ensure consistent use of "Scope of Work" in CPRIT's rules.



Public comment period is open through July 3rd.



The Oversight Committee will consider final adoption at the August 16th meeting.

Corrections to Financial Status Report (FSR) Supporting Documentation

§703.24(a)(5)

Adopted & final in 2022

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.

Eligible Grantee Matching Funds

§ 703.11(c)(7)

Adopted & final in 2022

 Adds relocation costs to Texas as a source of encumbered funds that a grantee may use to fulfill their matching funds requirement.

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)





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Apply for Funding

Grants Funded

Grants Process News & Events

About U

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 can of version of the Counce 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

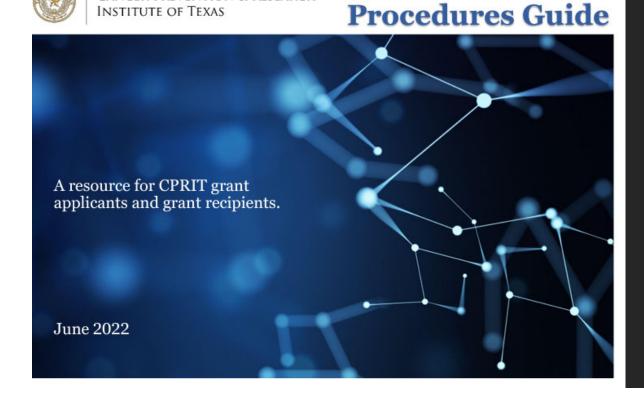
Procurement

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



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

Required Grant Reports



Polling Question

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

Answer: False

Seven of the required CPRIT reports are submitted annually.

Reporting Requirements

Annual

- Inventory Report
- Revenue Sharing Report
- HUB/Texas Suppliers Report
- Annual Progress Report
- Single Audit Determination Form
- Audit Report



Quarterly

- Financial Status Report
- Quarterly Progress Report

Progress Reports

Progress Reports

Progress Reports should contain accurate and complete impact data for <u>annual and final</u> reports.

This includes, but is not limited to:

- Publications
- Follow-on funds
- Patents and Patent Applications
- Client Stories
- Abstracts and Presentations



Progress Reports

Economic Impact

- How many NEW jobs were created = the number of positions filled during the last year (including the final report; final report should NOT be the cumulative number over the entire project). This number should be ZERO if positions haven't been added during the grant year
- How many jobs were maintained = the number of positions that continue from the year



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

RR grants only - Recruitment awardees are expected to report on all cancer-related publications

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

Financial Status Report (FSR)

Polling Question

A justification memo or letter should be included with the FSR supporting documentation for expenses submitted "outside the period".

Answer: True

Polling Question

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

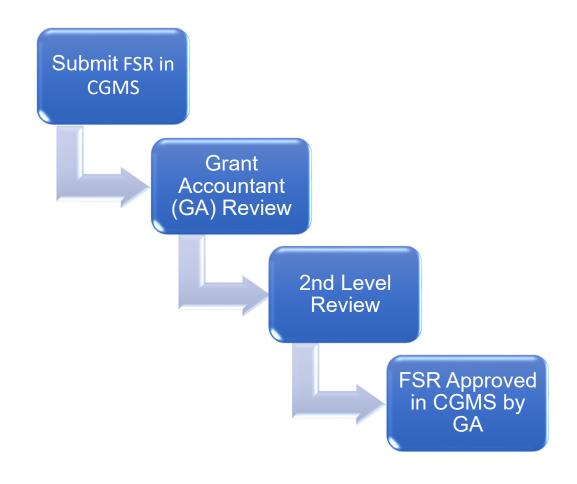
- A. 21 days
- в. 5 days
- c. 30 days

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.

FSR Support Documentation Resources



FSR Required Supporting Documentation by Expense Category

Details the documentation a grantee must provide to support expenses reported for each budget category



CPRIT FSR Checklist

A tool to assist grantees submit accurate information and documentation for all costs requested for reimbursement.

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

Mis-categorization of Expenses

- Expense mis-categorization is most common in these three budget categories;
 - Supplies
 - Other
 - Equipment
- Ensure that your <u>budget justification</u> allocates expenses to the appropriate budget category.

Mis-categorization of Expenses

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Supplies Category Expenses

- Desktop and laptop computers (including notebooks, tablets, and similar devices)
- Non-portable printers and copiers
- Communication devices (mobile telephones)
- Lab materials
- Office Supplies

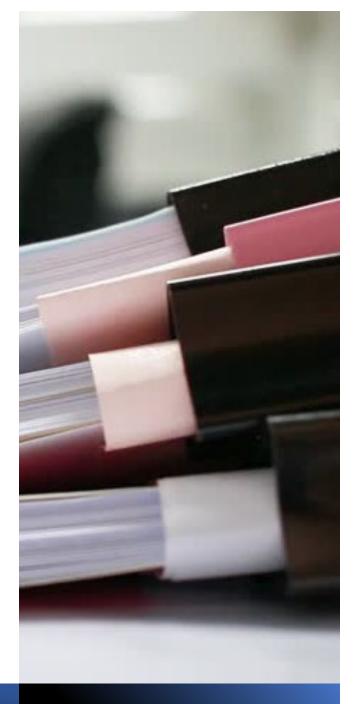
• Equipment with unit cost of less than \$5000



P&P Guide Reference: 10.6 Supplies Expense Category

Other Category Expenses

- Printing and reproduction expenses
- Gift or gas cards
- Publication fees
- Equipment warranties and service contracts
- Conference/registration fees
 - Conference and seminar registration fees should be reported in the "other" category when incurred by the institution/organization or when paid by an employee, but employee is not requesting travel reimbursement.
- Postage and shipping services (FedEx, UPS), etc.



P&P Guide Reference:
10.8 Other Expense Category



Equipment Category Expenses

 Equipment with unit cost of \$5000 or more

P&P Guide Reference: 12.4.4.7 Equipment

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			14.5
Total Solution Cr.			1,166.00
Amount Paid		USD	2,278.52
\$2,000 charged to CPRIT award	Credit Card Charge Details: MC ****5345	USD	2,278.52



Documents Not Clearly Labeled

• Individual items referenced in GL with the same letter:

TRAVEL	19.25	1	8/24/2022
TRAVEL	23.10	1	8/24/2022
TRAVEL	30.00	1	8/24/2022
TRAVEL	24.48	L	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	1	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	Ď	6/1/2022	CITIBANK N.A	4/26/2022	5/27/2022
Travel Out of State	TRAVEL	25.00	D1 y	6/1/2022	0	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 _V	6/8/2022		6/2/2022	6/6/2022
	Disellemed releases free	(0.05)	nιV				
ravel Out of State	TRAVEL	11.88	D5 V	6/8/2022		6/2/2022	6/6/2022
	Disanowed up	(1.00)	DUY				
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

Personnel / Fringe Expense Category

FSR Personnel & Fringe

- 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
 - 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.





Personnel Level of Effort (PLOE)

Polling Question

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

Answer: False

The PLOE should be updated quarterly before submitting the FSR.

Polling Question

Do employees whose salaries and fringe are charged to the grant need 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







- 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

Travel Expense Category



Polling Question

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

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 be excluded

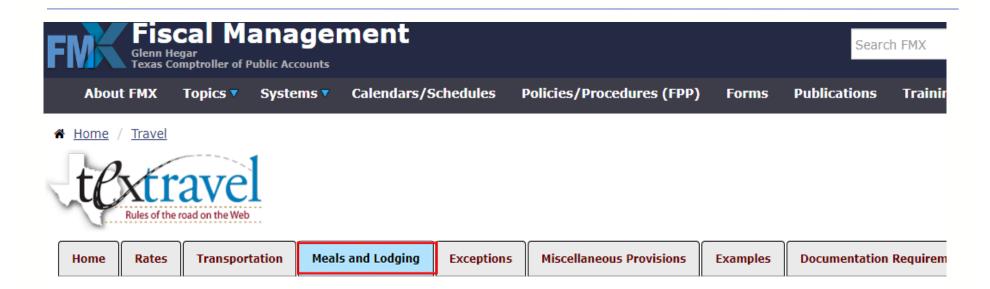


Meals and lodging expenses are within GSA limits



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

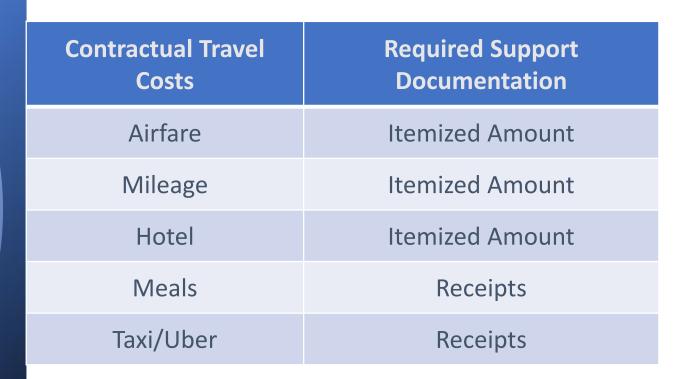
Foreign travel without prior CPRIT approval

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)

Contractual Travel







- 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

Travel Expenses Q & A

Equipment Expense Category



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		

No Cost Extensions (NCE)



No Cost Extension (NCE)

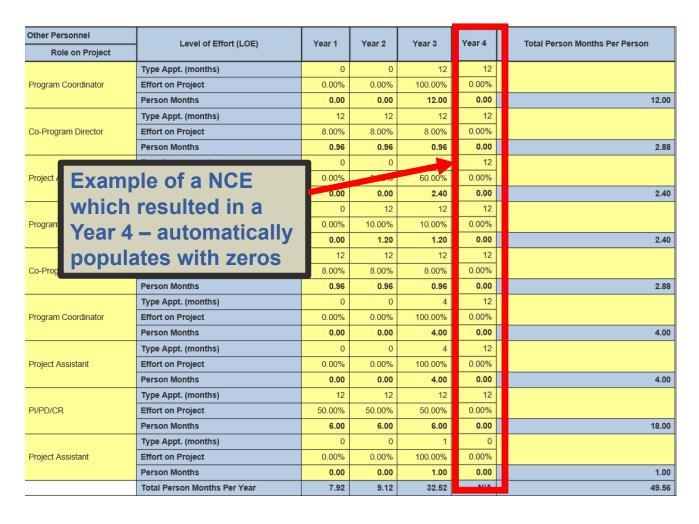
- Request must be submitted at least 30 days prior to termination date but not more than 180 days prior
- Grantee must complete the date field on the request
- More than 6 months can be requested
 - CPRIT will complete the date field for request greater than 6 months
 - The increased number of months should be mentioned in the first sentence of the justification

No Cost Extension (NCE)

- 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
- Approved NCEs
 - The PI must exhibit measurable effort during an approved NCE
 - The final report dates will change, but an additional annual report as well as quarterly reports are required until the contract ends

No Cost Extension PLOE Update

The PLOE for NCEs needs to be updated because the extension time period defaults to zero.





NCE – Frequently Asked Questions

What research can be conducted during an NCE?

Answer: Only scope of work items and associated aims and subaims that have been approved but have not yet been completed can be conducted during an NCE.

Programmatic Topics

Producing Materials

Any materials produced (flyers, electronic materials, presentations, etc.) using CPRIT funds must be preapproved by Carlton or Ramona BEFORE USE.

Please include Grant ID number in the document submission email. We will turn these around very quickly. Preferred file name: Grant ID number_Title of document.

Specific information about the Brand Guidelines and Logo can be found here (https://www.cprit.state.tx.us/news-events/media-resources#branding)

Change in Key Personnel Level of Effort (PLOE)

- Make sure name is entered same as payroll
 - First then last
 - No nicknames
- If replacing someone
 - Add a new line with new personnel
 - Add correct effort for new personnel
 - Ensure old personnel has 0 effort going forward
- Add detailed justification

PLOE Continued

Senior/Key Person and Other Personnel			Level of Effort (LOE)	Year 1	Year 2	Year 3	Total Person Months Per Person	
First Name	Last Name	Role on Project	Level of Elloft (LOE)	Teal I	Teal Z	Teal 3	Total Person Months Per Person	
	Allen	Co-Program Director	Type Appt. (months)	12	12	12		
Carlton			Effort on Project	45.00%	0.00%	0.00%		
			Person Months	5.40	0.00	0.00	5.40	
	Crockett	Health Education Coordinator	Type Appt. (months)	12	12	12		
Ken			Effort on Project	100.00%	100.00%	50.00%		
			Person Months	12.00	12.00	6.00	30.00	

Change – Not Otherwise Specified



Presenting at a conference that was not specifically specified in your application



Change in a subcontract agreement



Paying for an open access manuscript



Something was missing from your application

Conference and Seminar Registration Fees

- Conference and seminar registration fees should be reported in the "other" category when incurred by the institution/organization or when paid by an employee, but employee is not requesting travel reimbursement.
- Employees who pay the registration fees and incur travel expenses to attend the conference/seminar can report the fee on their travel reimbursement voucher.



New Quarterly Report



COMING SOON (FY 24)



NEW AND IMPROVED!



MORE COMMUNICATION COMING SOON

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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Stephen Nance Compliance Program Manager 512-305-8405 snance@cprit.texas.gov

Vince Burgess Chief Compliance Officer 512-305-8453 vburgess@cprit.texas.gov



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