Being a CPRIT Grantee: What You Need To Know – Academic Research Grantees

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Training Overview
- Overview and CPRIT's Impact
- Recent Administrative Rule Changes
- Financial Status Reporting
- Progress Reporting
- Matching Compliance Certification
- Other Required Reporting
- Change Requests/Grant Closeout
- Contractual and Programmatic Issues
- Compliance Monitoring
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CPRIT At-A-Glance

1,447
Number of Awards

$2.41 Billion
Amount of Awards

181
Cancer Researchers
and their labs recruited to Texas

51
Core Facilities
supported to ensure cutting-edge research
CPRIT At-A-Glance

160 Childhood Cancer Projects
12% of funding

132 Clinical Studies

5.7 Million Prevention services to Texans

SCHOLARS & COMPANIES ATTRACTED TO TEXAS

2 NEWS HAMPSHIRE
39 MASSACHUSETTS
2 CONNECTICUT
SALARIUS
ARAVIVE
15 INTERNATIONAL: Canada, Germany, Israel, Singapore, Sweden, Switzerland and United Kingdom

CELL MEDICA (UK)
ESSA (Canada)
FORMATION BIOLOGICS (Canada)
MEDICENNA (Canada)
HUMMINGBIRD (Singapore)
PERIMETER (Canada)

Administrative Rule Changes
How to Find the Rules on CPRIT's website

Click on "About Us" and then click on "Statute, Rules and Grant Policies Guide"

Rules and Policies & Procedures Guide on CPRIT's website

Link to current proposed rules

TAC Online

[Image of CPRIT's website and TAC Online]

*TAC: Texas Administrative Code
Rulemaking Timeline

- **Aug. 2019**: Announce proposed rule change(s) at OC meeting
- **Sept-Oct. 2019**: Public comment period
- **Nov. 2019**: Submit final rule(s) to Secretary of State
- **Sept. 2019**: Proposed rule change(s) published in Texas Register
- **Nov. 2019**: Present final order(s) at next quarterly OC Meeting
- **Dec. 2019**: TAC* updated with adopted rule change(s)

*TAC: Texas Administrative Code

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How to Stay Informed of Changes

- Subscribe to CPRIT's listserv by clicking on “Sign up for Our Newsletter” link, located in CPRIT website footer
- Check “Statute, Rules, and Grant Policies Guide” page of website
- Check Oversight Committee meeting agendas and meeting books
- Refer to “Version Control” section of Policies & Procedures Guide

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Recent Administrative Rule Changes

1. RFA Modifications
2. Temporary Leave of Absence
3. Budget Changes/Transfers
4. Approval of No Cost Extension Requests
5. No Cost Extension Request Review*
6. Grantee Cost Outside of FSR Period*

*Proposed at 8/21/19 OC Meeting
1. RFA Modifications

- Clarifies that modifications to Requests for Applications (RFAs) will be available on CPRIT’s public website.

2. Temporary Leave of Absence

- Requires a grantee to notify CPRIT and request approval of a temporary leave of absence of a Principal Investigator (PI), Program Director (PD), or Company Representative (CR).
- The notification should include the time period the PI, PD, or CR expects to be away from the grant project and the anticipated date of return.
- A grantee should notify CPRIT at least 30 days before the leave of absence begins, or as soon as reasonably possible.

3. Budget Changes/Transfers

- The proposed rule amendment clarifies when a grantee’s budget change or transfer is automatically approved. A grantee’s budget change/transfer will be automatically approved if:
  1. the total dollar amount of all changes of any single line item (individually and in the aggregate) within budget categories (other than equipment) is 10% or less of the total budget for the grant year;
  2. it will not increase or decrease total budget; and
  3. it will not materially change the nature, performance level, or scope of the project.
- CPRIT retains the right to review and reverse one or more budget changes under certain circumstances.

§ 703.3(b)
§ 703.10(c)(22)
§ 703.25(e)
4. Approval of No Cost Extension Requests

- Removes automatic approval of a grantee’s first no cost extension request.
- No other aspects of a no cost extension request are affected. A grantee may still request a no cost extension and it will be reviewed by CPRIT.
- In order to receive a no cost extension, a grantee must be in good fiscal and programmatic standing.

§ 703.14(c)

5. No Cost Extension Request Review

- The proposed rule amendment outlines a process for CPRIT to review a no cost extension request by a grantee that has a pending report that has been submitted but not yet approved by CPRIT.
- In general, a grantee must be in good fiscal and programmatic standing to receive a no cost extension.
- In the no cost extension request, a grantee must demonstrate good cause for failing to be in good fiscal and programmatic standing.

§ 703.14(c)

6. Grantee Cost Outside of FSR Period

- If a grantee requests reimbursement for a cost paid outside of the current FSR period, the grantee must submit a justification as to why the grantee failed to claim the expense during the correct period.
- CPRIT will review the justification when determining whether to allow the reimbursement.

§ 703.24(a)
Administrative Rule Changes

Q & A

Reporting Requirements Overview

Reporting Requirements
Required Reporting & Due Dates

- Financial Status Reports (FSRs)
  - Due 90 days after the state fiscal quarter

- Matching Compliance Certification (MCC)
  - Due 30 days following the FSR due date of the last quarter of the grantee's project year

- Progress Reports
  - Quarterly – due 15 days after the end of the state fiscal quarter
  - Annual – due 60 days after the anniversary of the contract effective date
  - Tranche/Interim – due upon completion of specific milestone/per program requirements

- Inventory Report
  - Due 60 days after the anniversary of the grant contract effective date

- Revenue Sharing Form
  - Due 60 days after the anniversary of the grant contract effective date

- Historically Underutilized Business Report (HUB) / Texas Suppliers Form
  - Due 60 days after the anniversary of the grant contract effective date

- Single Audit Determination (SAD)
  - Due 60 days after the grantee fiscal year end date

- Final Reporting/Close Out Documents
  - Due 90 days after the grant contract termination date
  - Except Final FSR - due 90 days following the end date of the last state fiscal quarter that includes the termination date of the grant contract
Who to Contact?

- Technical Issues? Contact CPRIT Helpdesk
- Programmatic/ Content questions? Contact the CPRIT Program Manager
- Financial Questions/Issues? Contact CPRIT Finance Manager/ Grant Accountant

Financial Status Reports

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

<table>
<thead>
<tr>
<th>Fiscal Quarter Reporting Period</th>
<th>FSR Due Date</th>
<th>Last Day of Grace Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sept 1 – Nov 30</td>
<td>Feb 28</td>
<td>Mar 30</td>
</tr>
<tr>
<td>Dec 1 – Feb 28</td>
<td>May 29</td>
<td>June 28</td>
</tr>
<tr>
<td>Mar 1 – May 31</td>
<td>Aug 29</td>
<td>Sept 28</td>
</tr>
<tr>
<td>June 1 – Aug 31</td>
<td>Nov 29</td>
<td>Dec 29</td>
</tr>
</tbody>
</table>

Required Order of Form Submission

- Q4 FSR
- Carry Forward
- Attachment B
- Budget Verification
- MCC*

* Due 30 days after FSR due date

Allow sufficient time for all forms to be processed and approved

Financial Status Reports (FSRs)

- FSRs due date - 90 days after the end of the state fiscal quarter
- 30-day grace period after the FSR Due Date
- If the FSR is not submitted within 30 days of the FSR due date, reimbursement of project costs incurred during the reporting period will be waived
- Deferral Process: see P&G Guide - Section 6.2.1
FSR - Support Documentation

- Should be in same order as amounts listed on the expenditure report
- Should include payment dates for all transactions
- Should contain: expense categories, itemized expenses and invoices by category, description of items, date paid, and amount paid with expense totals by category

FSR - Support Documentation

- Uploaded at the same time FSR is submitted
- Include summary report of expenses (General Ledger)
- Supporting documentation must be maintained on-site

FSR - Support Documentation

- Report only expenses paid during the current reporting period
- Payroll is an exception to this requirement
- Invoices paid prior to current quarter require justification memo
- https://www.cprit.texas.gov/grants-funded/grantee-resources/
FSR - Support Documentation

- Requests for additional documentation require a response **within 21 days**
  - After 21 days, FSR will be disapproved
  - Notify Grant Accountant once documentation is uploaded to Ad Hoc

FSR - Support Documentation

- Authorized Signing Official (ASO) **must** review and confirm accuracy of supporting documentation in CGMS before submitting FSR
- **T.A.C. 703.3(6), 701.25**
- **Policy & Procedure Guide, Section 2.7**

FSRs - Reporting Basics

- CPRIT requires grantees to use cash basis accounting when reporting expenses to be reimbursed
Financial Status Reports – Personnel / Fringe

Interactive

**True or False**

- An electronic means to sign timesheets is acceptable provided the grantee can demonstrate and document that only the employee’s actions would result in the identification of the activities to be charged, and that it complies with UGMS...
FSR - Personnel / Fringe

**Common Errors**
- Missing timesheets
- Missing certification of time
- Missing payroll ledger
- Tuition payments - employee is not listed on Personnel Level of Effort (PLOE)
- PLOE not valid for current reporting period
- Missing breakdown of types of fringe

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;
  - See P&P Guide, Section 10.2

FSR - Overtime

- Overtime is an allowable expense
- See P&P section 10.2.4 for additional overtime requirements
Personnel Level of Effort (PLOE)

- For salary expenses show the position name, title, and level of effort on the PLOE prior to submitting for payment.
- Keep PLOEs current (if end date prior to FSR period, submit new PLOE with FSR).
- For No Cost Extensions (NCEs) the PLOE comes in as a zero by default—make sure PLOEs are current and accurate for NCEs.

Example of NCE which resulted in a Year 4 - auto-populates with zeros.

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.
FSR – Personnel / Fringe

Q & A

Financial Status Reports – Travel

Interactive

A separate travel expense report should be submitted with all supporting documentation.

A. monthly, for each individual
B. for each trip taken
C. one report monthly for all individuals
D. one report quarterly for all individuals
**FSRs - Travel**

Generally, when submitting travel reimbursement requests, dates of travel:

A. must occur within the PLOE period and PLOEs must be updated before submitting FSR.
B. can be paid outside of the reporting period, but reported in the current FSR period.
C. can be outside of the grant period, but only if the travel was approved while the grant was active.
D. B & C

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**Interactive**

**True or False**

Travel expense reports must be signed by the traveler and approved by the employee’s supervisor.

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**FSRs - Travel**

**Common Errors**

- No expense report submitted
- Multiple meals on one receipt
- PLOE is not updated to cover personnel and dates of travel
- All receipts are not tied to amounts on front of expense report (and must tie those amounts to total on expense report)
FSRs - Travel

Common Errors

- Travel incidentals, meals, and lodging – identify which specific supporting documents/amounts are included in each individual amount
- Rounding up mileage
- If splitting with another funding source, show breakdown of CPRIT portion
- Receiving credit card receipt showing lump sum expenses (need itemized receipt or signed affidavit)

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FSRs - Travel

- Travel expense reports must be signed by the traveler and approved by the employee’s supervisor
- A separate travel expense report should be submitted with all supporting documentation for each trip taken
- Employee must be listed on the Personnel Level of Effort (PLOE) form

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FSRs - Travel

- Travel expense report must include the following:
  - Grantee Name
  - Grant ID
  - Printed Name of the employee traveling
  - Date(s) of travel
  - Purpose of the travel
  - Itemization of expenses
CPRIT follows TexTravel guidelines for reimbursement of travel: https://fmx.cpa.texas.gov/fmx/travel/textravel/index.php
An expense report should include an attachment of GSA rate printout for the travel location(s).

- An individual may claim less than the maximum meal reimbursement rate for a duty point and use the amount of the reduction to increase the maximum lodging reimbursement rate for the duty point (per day). This should be noted on the expense report.

<table>
<thead>
<tr>
<th>Date</th>
<th>Rate</th>
<th>Meal</th>
<th>Meal Per Diem Remaining</th>
<th>Lodging</th>
<th>Lodging Per Diem Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/1/2018</td>
<td>$61.00</td>
<td>$21.60</td>
<td>$39.40</td>
<td>$143.00</td>
<td>$39.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Dates of travel must occur within PLOE period.
- PLOEs must be updated before submitting FSR.
- Travel must occur during the grant period.
- International travel requires prior approval.
If per diem for meals is requested on the travel authorization, meal receipts are not required.

Expenses for alcohol and gratuity are **unallowable**.

Grantees utilizing a central travel department may provide the transactional document for airfare purchases as proof of expense (must be accompanied by an expense report).
Interactive

Subcontractor and consultant costs directly associated with carrying out the grant statement of work must be classified as __________ expenses on the FSR.

A. Payroll  
B. Contractual  
C. Supplies  
D. Other

FSRs - Supplies

For academic institutions, the Supplies and "Other" categories require invoices for any single expenditure equal to or greater than $750.

Travel, Contractual, and Equipment categories require 100% documentation - applies to all grantees

FSRs - Supplies

➢ For organizations that have a central supply department may provide a transactional document from the central supply department for the supplies received from that department as proof of expense
FSRs - Contractual

- Indirect costs on contractual invoices may be classified as indirect costs and are not reimbursable as contractual expenses
- See P&P Guide, Section 10.6
- Submit copies of all invoices, regardless of amount

FSRs - Contractual

<table>
<thead>
<tr>
<th>Contractual Travel Costs</th>
<th>Required Support Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airfare</td>
<td>Itemized Amount</td>
</tr>
<tr>
<td>Mileage</td>
<td>Itemized Amount</td>
</tr>
<tr>
<td>Hotel</td>
<td>Itemized Amount</td>
</tr>
<tr>
<td>Meals</td>
<td>Receipts</td>
</tr>
<tr>
<td>Taxi/Uber</td>
<td>Receipts</td>
</tr>
</tbody>
</table>

FSRs

Allowable Costs

- All costs charged to a CPRIT grant must meet the general allowability criteria established by the Uniform Grant Management Standards (UGMS)
- Although a cost may meet the allowability criteria established by UGMS, CPRIT may restrict or cap the reimbursement of allowable costs
Allowable Costs

- Any restriction and/or limitation of allowable costs will be specified in the applicable statute, administrative rule, contractual term (including the approved budget), or the request for application.

Allowable vs. Unallowable

- Academic conferences - if they are in the budget.
- In most cases, CPRIT grant awards only pay for two participants to attend the CPRIT Conference. Research Training and Recruitment Awards are exceptions to the two-attendee rule.

Allowable vs. Unallowable

- Invoices paid after the end of a financial quarter are unallowable. These costs should be reported in the following quarter’s financial status report. EXCEPTION: Final FSR
- Clothing purchases such as uniforms, lab coats, boots, etc. - but they must be listed in the project budget.
**FSRs**

**Allowable vs. Unallowable**

- Cell phone charges paid as supplemental payroll are unallowable.
- Payments directly to a cell phone provider are allowable.
- Purchase of equipment, if not initially budgeted in the CPRIT proposal, requires prior approval.

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**Q & A**

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**Progress Reporting**
Progress Reports

- **Annual** - 60 days after the anniversary of the grant contract effective date
- **Quarterly*** - 15 days after the end of the state fiscal quarter
- **Tranche/Interim** - Upon completion of milestones per Program requirements
- **Final** - Within 90 days of grant contract termination date

*PREVENTION ONLY

Common Errors

- Incomplete report
- Overlap with previous reports
- Duplicate entries (publications, jobs, etc.)
- Missing PDFs for published and in press publications
- Inconsistencies between narrative and data entered

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

Q & A

Matching Compliance Certification

Interactive

What is the proper reporting sequence?

A. Q4 FSR, MCC, Carry Forward, Budget Verification, Attachment B
B. Attachment B, Carry Forward, Budget Verification, Q4 FSR, MCC
C. Q4 FSR, Carry Forward, Attachment B, Budget Verification, MCC
D. MCC, Q4 FSR, Carry Forward, Attachment B, Budget Verification
Which of the following is an allowable match expense?

A. Tips and gratuities  
B. Lobbying costs  
C. Payroll over $200,000  
D. Entertainment

Common Errors

- Federal Indirect Cost rate not current
- Missing Detailed Backup Documentation
- Missing fields on MCC form
- Match includes unallowable costs
- Match costs are outside of period
- Match expense are not related to CPRIT award
Institutions of Higher Education may use their Federal Indirect Cost Rate to fulfill match requirement

Institutions of Higher Education must upload to each grant record most current indirect cost rate agreement

See P&P Guide, Section 6.4

If grantee uses a blended indirect cost rate calculation, grantee is required to have a documented internal policy
MCC

- Must maintain a **separate account** for funds used to meet matching requirement.
- Submit documentation of expenditures used to meet annual matching requirement:
  - Copy of accounting report/documents including general ledgers, etc. (matching not met through FICR).

MCC

- the grantee’s expenditure 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.

MCC

- If a grantee fails to expend its matching funds requirement for the year, the deficiency may be carried forward and added to the matching fund requirement for the next project year so long as:
  - the deficiency is equal to or less than 20% of the total matching funds required for the same period; and
  - the grantee has not previously had a matching funds deficiency.
 Allowable Expenses Toward Match

- 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)
- 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
- 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

Unallowable Expenses Toward Match

- Alcoholic beverages
- Food and beverage costs for groups
- Tips or gratuities
- Franchise taxes
- Liability insurance
- Contributions or donations
- Lobbying costs

- Fundraising
- Promotional items
- Fines and penalties
- Interest or finance costs related to debt
- Bad debt
- An honorary gift or gratuitous payment
- Entertainment, amusement, or social activities and related incidental costs
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.

Sub-awardee Contribution Towards Match
The subcontractor's or sub-awardee's portion of otherwise allowable Matching Funds for a Project Year may not exceed the percentage of the total Grant Funds paid to the subcontractor or sub-awardee for the same Project Year.

T.A.C. 703.11(c)(6)

If a grantee uses a blended indirect cost rate calculation of the portion of federal indirect cost rate, Grantee is required to have and follow a documented internal policy.
Year-End Form Submission

Required order for form submission:

1. Q4 FSR
2. Carry Forward
3. Attachment B
4. Budget Verification
5. MCC

*Allow sufficient time for all forms to be processed and approved

MCC

Q & A

Other Required Reporting
Interactive

The Single Audit Determination (SAD) form is due
A. 30 days after the grantee fiscal year end date.
B. 60 days after the grantee fiscal year end date.
C. 60 days after the grant year end.
D. 90 days after the grant year end.
E. None of the above.

Interactive

True or False

Grantees are required to submit the Inventory report even if they have not purchased or budgeted funds for equipment purchases.

Inventory Report

- Form is required even if you have not purchased or budgeted funds for equipment purchases
- Report equipment purchases with a unit price of $5,000 or more
- Maintain a record of the equipment:
  - Purchase date
  - Cost
  - Location
Inventory Report

- Amounts **must** match numbers on last quarter FSR.
- Title to equipment vests with the organization upon completion of the CPRIT-funded project.

Revenue Sharing

- Completing the form is **required** even if you have no revenue to report.
- Maintain a separate account for revenue earned from grant funded activity, sales, etc.
- Keep complete and accurate revenue records.
- Payments due to CPRIT shall be determined on a calendar basis and shall be paid quarterly within 30 days after the close of the calendar quarter.

HUB/Texas Suppliers

- Grantees are expected to make good faith efforts to utilize HUBs in subcontracts.
- Grantees must make good faith efforts to purchase at least 50% from suppliers in the State of Texas.
HUB/Texas Suppliers

- If more than 40% of Grant Award funds budgeted for a Project Year on goods and services outside of the State, Grantee must notify the Institute in writing and provide an explanation (at bottom of form) of the good faith efforts including a statement that products and materials were not available in the State at a comparable price and time.

HUB/Texas Suppliers

- Form is required even if you have been unable to purchase from Texas suppliers or HUB(s)
- Complete form in its entirety or form will be disapproved
- Link to HUB Directory and vendor debarment list: https://mycpa.cpa.state.tx.us/tPASScmblsearch/index.jsp

Single Audit Determination (SAD) Form

- All SAD forms due after Sept. 1, 2019 may be submitted via CGMS along with any subsequent audits
- Any SAD forms due prior to Sept. 1, 2019 should be submitted via email at complianceprogram@cprit.texas.gov
- Any audits due before or after Sept. 1, 2019 that were not initiated by a CGMS submitted SAD form are to be submitted to CPRIT via email at complianceprogram@cprit.texas.gov
Audit Requirement

- If a grantee expends $750,000 or more in state awards, they are required to submit a single audit, program-specific audit, or an agreed-upon procedures engagement.
- Must be submitted within 30 days of receipt, but no more than 9 months after the grantee’s fiscal year end.

Audit Requirement

- If a grantee is delinquent in filing required audit and/or corrective action plan, reimbursements and advances will be withheld, and grantee is ineligible to be awarded a new or a continuation Grant Award.

Other Required Reporting

Q & A
**Change Request Types**

- **Change – Not Otherwise Specified**
  (e.g., add equipment purchases, tuition costs, foreign travel approvals)
- **Goal or Objective Change**
- **Change of Organization Request**
- **Contract Amendment Change Request**

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**Change Request Types**

- **No Cost Extension**
  - Must be submitted at least 30 days but no more than 180 days prior to the Contract Termination Date
- **PI Change Request**
- **Rebudgeting**
  - Requests under 10% are automatically approved
- **Personnel Level of Effort Change**

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**Change Requests**

Unless otherwise noted, Change Requests:

- Require CPRIT approval
- All requests must be made via the dropdown under the Change Request Tab in CGMS
Grant Closeout

Close-Out Documents
- Financial Status Report
- Final Progress Report
- Annual Inventory Report
- Historically Underutilized Business / Texas Supplier Report
- Single Audit Determination Form
- Revenue Sharing Form

Grantees must file final close-out reports within 90 days of contract termination date. An Exception: Final Financial Status Report (FSR) is due 90 days following the end of the last state fiscal quarter that includes the termination date of the grant contract.

Grant Closeout

Grant institutions are ineligible to receive new or continuation grant awards if close-out documents aren’t submitted within 180 days of the termination date for any grant. An institution will remain ineligible to receive new grant awards or continuation grant awards until the close-out documents are submitted. It is possible to request that the CPRIT CEO waive submission of close-out documents.
Grant Closeout

Post Close-Out

- Certain contractual obligations extend beyond the grant contract termination date such as:
  - Single Audit or an Agreed Upon Procedures should be submitted by the due date
  - If applicable, providing intellectual property information about product development activities and revenue sharing

Grant Closeout

Post Close-Out

- Even though a grant is closed, certain forms and functions such as correspondence and the ability to upload Ad Hoc documents are still accessible in CGMS

Change Requests & Grant Closeout

Q & A
Contractual & Programmatic Highlights

Interactive

Per terms of the grant contract, Grantees are under obligation to notify CPRIT of any unexpected adverse event or condition that materially impacts the performance or general public perception of the conduct or results of the project and CPRIT-funded activities.

A. within 24 hours of the incident.
B. within 48 hours of the incident.
C. at the same time it is required to notify any Federal or State entity.
D. within 24 of notifying any Federal or State entity.

CPRIT's Policies and Procedures Guide provides a framework for the review, award, and implementation, and monitoring of CPRIT-funded grant awards and is designed to be the ‘one stop’, all-inclusive guide for Grantees.

A. True
B. False
C. It depends on the specific situation
D. I really don’t know
Interactive

Grantees must maintain records pertaining to the specific Grant Contract for:

A. three years following the grant closing date.
B. four years following the grant closing date.
C. three years following the date the last disbursement of funds is made by the Institute or all reports required pursuant to the Grant Contract are submitted and approved, whichever date is later.
D. four years following the date of the last disbursement of funds.
E. I really don’t know.

Policy & Procedure Guide

- Guide is not all-inclusive
- Provides a framework for the review, award, and implementation, and monitoring of CPRIT-funded grant awards
- Grantee should always consult administrative rules and award contract
- If a conflict exists, then provisions of state regulations, administrative rules, or contract provisions will prevail over the P&P Guide

Policy & Procedure Guide

- Grantees are encouraged to consult the most recent version of the Guide on CPRIT’s website (vs. printing a copy) due to ongoing revisions
- Questions regarding the Guide – cpritpolicyguide@cprit.texas.gov
Contract Highlights - Duty to Notify

Contract Section 9.07
Grantees are under obligation to notify CPRIT at the same time it is required to notify any Federal or State entity of any unexpected adverse event or condition that materially impacts the performance or general public perception of the conduct or results of the project and CPRIT-funded activities.

Contract Highlights - Subcontractors

Uniform Grants Management Standards (UGMS) Attachment A - B.22

- “Subcontractor” means a purveyor of goods or services engaged by a primary contractor to provide goods, services or both through a procurement relationship generally available to any purchaser for a stated price.
- Such goods or services may contribute to carrying out some portion of a scope of services for which grant funds are expended and they constitute procurement.

Contract Section 2.08
- All subcontracts shall be in writing and shall be subject to the requirements of the CPRIT contract.
- Grantees shall enter into and maintain a written agreement with each permitted contractor with terms and conditions sufficient to ensure that the Grantee and contractor fully comply with the terms of the CPRIT contract.
Contract Highlights - Record Retention

- All grantees and their subcontractors paid with grant funds are expected to create and maintain complete and auditable fiscal records.
- Grantees must maintain records pertaining to the specific Grant Contract for a period of three years following the date the last disbursement of funds is made by the Institute or all reports required pursuant to the Grant Contract are submitted and approved, whichever date is later.

Contract Highlights - Record Retention

- The grantee must make all documents and electronic records related to the grant contract available for inspection during regular working hours upon the request for review, investigation, or audit.
- Annual financial statements, tax returns, and budgets may be requested.

Institutional Commitment (Recruits)

- The financial commitments made to the candidate by the recruiting institution are required to be equal to or exceed 50% of the proposed CPRIT award across the course of the CPRIT award.
- Institutional Commitment must be included in the grant application, presented in tabular a summary that clearly identifies:
  - the salary amount,
  - sources, and
  - any additional research support from institutional sources over the course of the CPRIT award.
Salary Cap

- The annual salary (also referred to as direct salary or institutional base salary) that an individual may be reimbursed from a CPRIT award for FY 2019 is limited to a maximum of $200,000.
- In other words, an individual may request salary proportional to the percent of effort up to a maximum of $200,000.
- Salary does not include fringe benefits and/or facilities and administrative costs, also referred to as indirect costs.

Programmatic Highlights (AR)

- Scholars
  - Institutional Commitment
- PLOEs
  - maintaining level of effort approved by Oversight Committee (particularly MIRA applications) throughout award period (unless CPRIT approved justification).
  - include all personnel with expenditures to award on PLOE
  - update level of effort prior to No Cost Extensions

Programmatic Highlights (AR)

- No Cost Extensions
  - include time, process and justification requirements
  - PI level of effort requirements during an approved NCE
  - progress reporting requirements
- Progress Reporting
  - Provide accurate and complete impact data
  - Publications, follow-on funds, patents, Clinical Trials, Research Training Award data
Programmatic Highlights (AR)

- Public dissemination of Scientific work
  - Acknowledgement of CPRIT funding if research being conducted and/or discovery is related to CPRIT funding
  - Press releases, publications, web sites, etc.
  - CPRIT Scholar – Use of Prestige Title
- REMINDER – PIs are required to follow applicable reporting and disclosure policies regarding significant foreign commitments and activities

Programmatic Highlights (AR)

Rebudgeting

- Budgets within each category may be adjusted by submitting a “Rebudgeting Change Request”
- Prior approval is not needed if:
  - the total dollar amount of all changes of any single line item (individually and in the aggregate) within budget categories (other than equipment) is 10% or less of the total budget for the grant year;
  - it will not increase or decrease total budget; and

- It will not materially change the nature, performance level, or scope of the project;
- transfer will not materially change the project’s nature, performance level, or scope of work
- request is submitted with justification and updated budget
- CPRIT may review and reverse budget changes, depending on the circumstances
Contractual & Programmatic Highlights

Q & A

Compliance Program Overview

Post-Award Grant Monitoring
- On-Boarding / Annual Training
- Risk Assessments (Annually/Quarterly)
- Compliance Monitoring Reviews
  - Desk Reviews, On-site Reviews, Ad-hoc Reviews
- FSR 2nd Level Reviews
- Annual Attestation
- SAD Form Tracking
- Single Audit Reviews

Compliance Program

10/8/2019
**Common Compliance Monitoring Summary**

### 2018 Desk Review Findings

- **Category**
  - Annual Progress Reporting - Timeliness
  - CPRIT Acknowledgement
  - HUB Reporting - Timeliness
  - Matching Compliance Certification - Timeliness
  - Revenue Sharing Reporting - Timeliness
  - Single Audit Determination Forms - Timeliness

### 2018 On-site Findings

- **Category**
  - Annual Progress Reporting - Timeliness
  - CPRIT Acknowledgement
  - HUB Reporting - Timeliness
  - Matching Compliance Certification - Timeliness
  - Revenue Sharing Reporting - Timeliness
  - Policies and Procedures
  - Procurement Process
  - Revenue Sharing Reporting - Timeliness

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**Common Compliance Review Findings**

- **Procurement Process** (UIGMS, Subpart C.36, Texas Government Code 2254) (Contractor, vendor, and consultant selection)
  - Follow written procurement procedures
  - Maintain records relating to method, selection, and pricing

- **Subcontractor Monitoring**
  - Follow written monitoring procedures
  - Maintain records relating to monitoring efforts
Common Compliance Review Findings

- Debarment Checks
  - Maintain debarment check search results
    - https://www.sam.gov/portals/SAM/#1

- Lack of Documented Policies and Procedures
- Publications
  - No CPRIT scholar prestige title referenced

Publications

- No CPRIT acknowledgement, no PubMed ID, publication not CPRIT funded
- PLEASE NOTE: If your publication is not funded by CPRIT, it should not be included in your progress report

- Matching Compliance Certification (MCC)
  - MCC and Rate Agreement (FIR) do not match
- Inaccurate reporting (FSR, MCC, SAD)
- Timely Submission of Required Reporting

Consequences of Non-Compliance

- Withhold Reimbursement/Advancements
- Waive Reimbursement
- Termination of the Grant
- Ineligible to receive additional grants
**Fraud, Waste, & Abuse**

**Fraud** - generally defined as any intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to that person or some other person.

**Waste** - overutilization of services or other practices that, directly or indirectly, result in unnecessary costs. It is not generally considered to be caused by criminally negligent actions, but by the misuse of resources.

**Abuse** - Payment for items or services when there is no legal entitlement to that payment and the individual or entity has knowingly and/or intentionally misrepresented facts to obtain payment.

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**How do I Make a Report?**

(Users can remain anonymous)

*Use Client Code #5124633190*

**Call**

1-877-64-RedFlag
(1-877-647-3335)

**Online**

Fraud, Waste, & Abuse

Compliance Program/Monitoring

Q & A

Grant Requirements Sources

- Texas Health and Safety Code Chapter 102
- Texas Administrative Code, Title 25, Chapters 701-703
- CPRIT Policies and Procedures Guide
- Uniform Grant Management Standards
- Grant Contract
- Request for Applications (RFA)
- Instructions for Applications (IFA)
Grant Requirements Sources

Policy and Procedure Guide

Required Report and Consequences Table
- https://www.cprit.texas.gov/media/1043/grantee_required_reports_consequences_032017.pdf

Quarterly Progress Report FAQs

Other Grantee Resources
- https://www.cprit.texas.gov/grants-funded/grantee-resources/

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Being a CPRIT Grantee: What You Need To Know - Academic Research Training