


CPRIT Grantee Annual Compliance Training

March 2023




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INSTITUTE OF TEXAS

Prevention

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Training Overview

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

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Fraud, Waste, & Abuse

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Fraud, Waste, & Abuse

How do I Make a Report?

Use Client Code #5124633190
(Users can remain anonymous)

Call

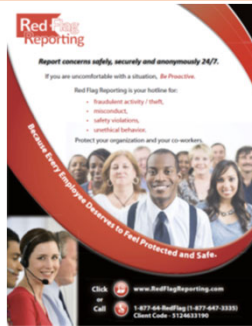
1-877-64-RedFlag
(1-877-647-3335)

Online

www.RedFlagReporting.com

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Fraud, Waste, & Abuse



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Administrative Rules

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How to Stay in the Know

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

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Recent Administrative Rule Changes

Corrections to Financial Status Report (FSR) Supporting Documentation

Eligible Grantee Matching Funds

Texas Grant Management Standards

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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.

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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.

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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.

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Administrative Rule Changes


Q & A



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CPRIT Policies & Procedures Guide



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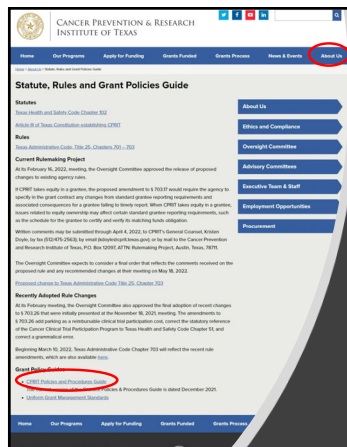
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Sources of CPRIT Grantee Requirements

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

<https://cprit.texas.gov/about-us/statute-rules-and-grant-policies-guide/>

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Policies & Procedures Guide Overview

Grant Policies and Procedures Guide

A resource for CPRIT grant applicants and grant recipients.

June 2022

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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

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Chapter 5: Grant Contracts

**Personnel Level of Effort
(PLOE)**

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Polling Question

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

- True or False

Answer: False

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Polling Question

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

Answer: YES


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PLOE Checklist

- PLOE **must be updated prior** 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

Best Practice



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



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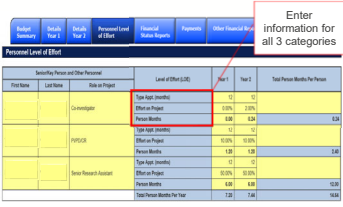
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PLOE Checklist


PLOE change requests contain all the following elements:

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



Enter information for all 3 categories

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




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PLOE Recap

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




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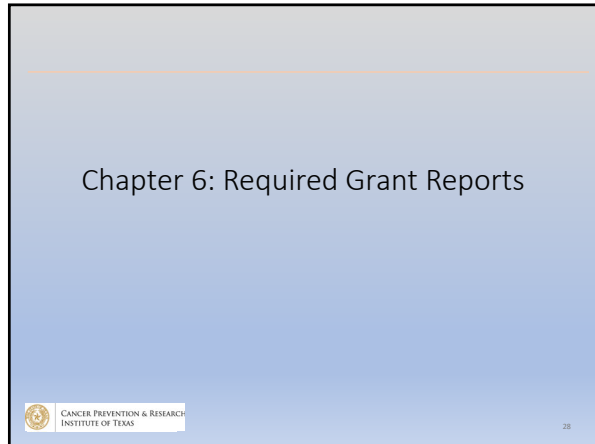
Personnel Level of Effort Q & A



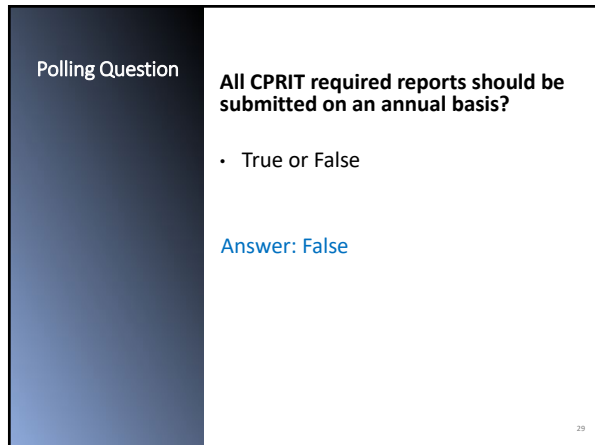
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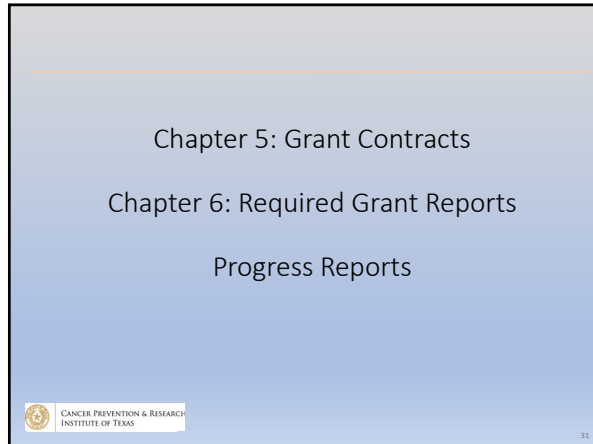
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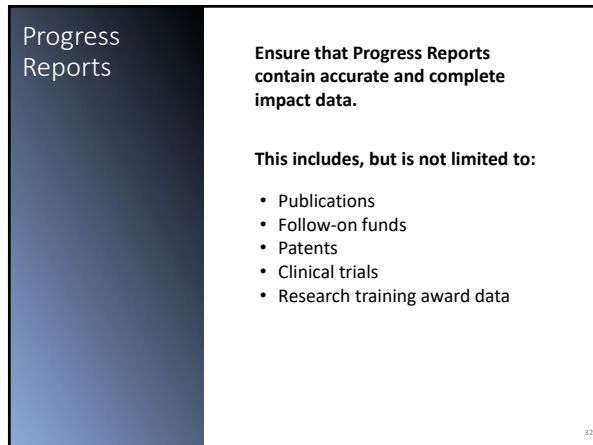
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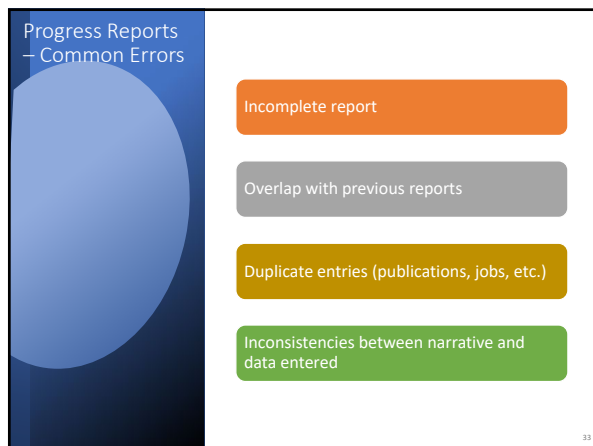
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CPRIT
Acknowledgment

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

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CPRIT Acknowledgment

Funding
This work was conducted with support from [redacted] Cancer Prevention Research Institute of Texas (CPRIT) RP150587. [redacted] 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

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Chapter 9: Allowable Costs

Chapter 10: Grantee Budget/Expense Categories and
Required Documentation

Financial Status Report (FSR)

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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

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Polling Question

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

- A. 21 days
- B. 5 days
- C. 30 days

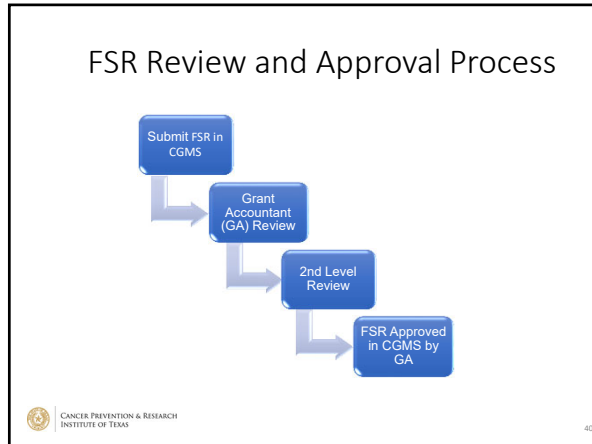
Answer: B

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FSR – Due Dates

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

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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**

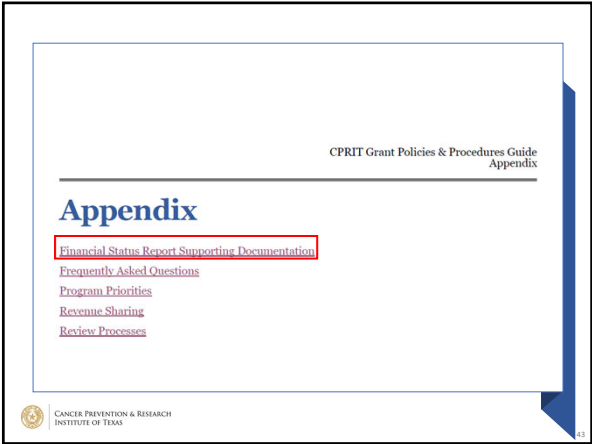
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FSR Required Supporting Documentation

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.

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FSR Required Supporting Documentation by Expense Category	
Personnel	<ul style="list-style-type: none">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 CGMSChanges 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	<ul style="list-style-type: none">Summary of benefits paid including employee name, type of benefit, and the amount with a totalGrantees 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<ul style="list-style-type: none">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.

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FSR Required Supporting Documentation by Expense Category	
Travel	<ul style="list-style-type: none">Employee travel reimbursement request form<ul style="list-style-type: none">To be eligible for grant reimbursement, employee names must match those on the PLOEDocumentation to support all travel costs.<ul style="list-style-type: none">mileage logshotel receiptsairfare receiptsGSA rate printout for travel location zip code(s)public transportation receiptsmeal receipts (not required if traveler claims per diem for meals)conference/seminar registrationcopy 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. <p><i>Travel costs charged to the grant must be consistent with the State of Texas TexTravel Guide, https://fnrc.cga.state.tx.us/fnrc/travel/texttravelindex.php.</i></p>





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FSR Required Supporting Documentation by Expense Category	
Equipment	<ul style="list-style-type: none">• Copy of the vendor invoices for all equipment costs<ul style="list-style-type: none">◦ <i>Purchase orders and packing slips are not acceptable forms of supporting documentation</i>• 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	<ul style="list-style-type: none">• 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.

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FSR Required Supporting Documentation by Expense Category	
Contractual	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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.
<ul style="list-style-type: none">• For detailed information about required documentation for costs claimed on a FSR, grantees should refer to Chapter 10 of CPRIT's Policies and Procedures Guide.	


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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


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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

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FSR – Examples of Unallowable Costs


INDIVIDUAL
PROFESSIONAL
MEMBERSHIP FEES


ALCOHOL


TIPS & GRATUITIES


BAD DEBT


LOBBYING COSTS


ENTERTAINMENT

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Common FSR Review Issues

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

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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.



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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 CPRIT award	Credit Card Charge Details: MC ****5345	USD 2,278.52



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Documents Not Clearly Labeled

- Individual items referenced in GL with the same letter:

TRAVEL	19.25	I	8/24/2022
TRAVEL	23.18	I	8/24/2022
TRAVEL	30.00	I	8/24/2022
TRAVEL	24.44	I	8/24/2022
TRAVEL	✓ 989.00	I	8/24/2022
TRAVEL	725.00	I	8/24/2022
TRAVEL	18.75	I	8/24/2022
TRAVEL	17.60	I	8/24/2022
TRAVEL	20.10	I	8/24/2022
TRAVEL	33.55	I	8/24/2022
TRAVEL	29.95	I	8/24/2022
TRAVEL	46.25	I	8/24/2022
TRAVEL	6.30	J	8/24/2022
TRAVEL	4.90	J	8/24/2022
TRAVEL	790.50	J	8/24/2022
TRAVEL	36.90	J	8/24/2022
TRAVEL	9.25	J	8/24/2022
TRAVEL	5.80	J	8/24/2022
TRAVEL	14.84	J	8/24/2022
TRAVEL	33.55	J	8/24/2022
TRAVEL	9.25	J	8/24/2022



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Documents Not Clearly Labeled

Items individually referenced

Travel Out of State	Travel	250.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	250.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	600.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Displacement, Out of State	Displacement, Out of State	10.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	27.75	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Displacement, out of state fees	Displacement, out of state fees	121.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	50.25	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Displacement, out of state fees	Displacement, out of state fees	20.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	11.50	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Displacement, out of state fees	Displacement, out of state fees	20.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Travel Out of State	Travel	25.10	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Displacement, out of state fees	Displacement, out of state fees	10.00	100	6/1/2022	6/30/2022	6/30/2022	6/30/2022
Total	Total	200.00	100				

✓11.88

QOS: \$11.88

Pay on Check # 1

Adm King Action Salary

Payroll # 1

Three Address

None

Payroll Subtotal

Adm King Action Salary

Payroll # 1

Three Address

None

Total

11.88

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Invoices Lack Detailed Description

Unclear description:

Line #	PO Line #	Description	UOM	Qty	Unit Price	Extended Amount
1	1	COLUMBIA C4 214TP SRS VYDAC SORA	EA	1	\$1,127.6100	\$1,127.61

Clear description:

100022-00	Singlepoint Windows #22	2	C	\$4.50	0.000	100.00
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Lack of response from grantee for additional information

Texas Administrative Code

TITLE 25

PART 11

CHAPTER 703

RULE §703.24

HEALTH SERVICES

CANCER PREVENTION AND RESEARCH INSTITUTE OF TEXAS

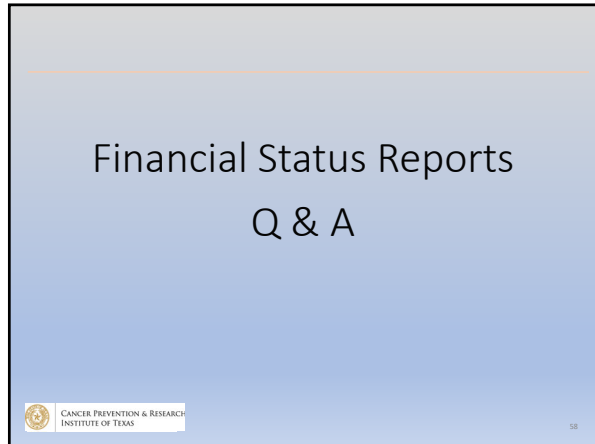
GRANTS FOR CANCER PREVENTION AND RESEARCH

Financial Status Reports

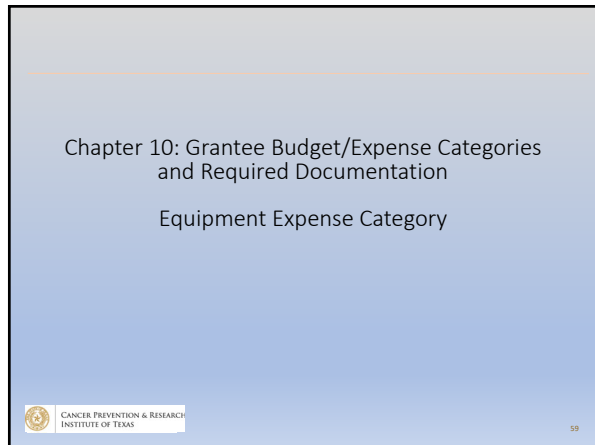
(5) The Institute may request in writing that a Grant Recipient provide more information or correct a deficiency in the supporting documentation for a Financial Status Report. If a Grant Recipient does not submit the requested information within five (5) business days after the request is submitted,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

TAC §703.24 (a)(15)

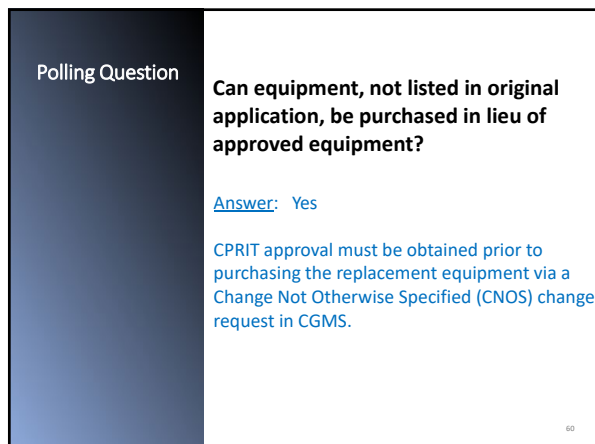
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Polling Question

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.

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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





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Acceptable Equipment Documentation

Change Requests

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

Grant Title: [REDACTED]
Organization: [REDACTED]

Grant Information

Contacts

Documents & Forms

Correspondence

Internal Review

Budget & Financial Status Reports

Progress Reports

Change Requests

Back to Change Requests

Change - Not Otherwise Specified

* Change Request Details:

I am requesting to rebudget funds allocated to subcontracts to purchase a tissue homogenizer, \$42,750.

* Justification:

The remaining equipment requires a greater degree of F rates to be recovered from tumors and protein made between them resulting from our past animal cohorts. For this reason, we require the equipment purchased at a homogenizer.

View/Hide Notes and Comments About This Document

2022-02-07 08:45: Complete Web Form: [REDACTED]

2022-02-07 08:45: Verify Information (per [REDACTED])

2022-02-07 08:51: ASO Review (approved): [REDACTED]

2022-02-07 12:05: Grant Manager Review (approved) - Moore, Patty (Grants Manager)

2022-02-07 12:07: Contract Manager Review (approved) - Nelson, Lisa (Contract Manager)

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Acceptable Equipment Documentation

LINE	PART ID	DESCRIPTION	UM	TAX	QUANTITY	UNIT PRICE	EXTENSION
1	NS0001	NanoAssembler Spark Instrument	EA	R	✓ 1.0000	25,115.00	✓ 25,115.00
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 NanoAssembler, Agilent TapeStation, Shaking Incubator, Oxford Nanopore Technology MinION (refer to budget justification for details).	\$50,000

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Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Travel Expense Category

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Polling Question

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

- True or False

Answer: True

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Polling Question

Should meal receipts be submitted if claiming per diem?

Answer: No

Meal receipts are not required when claiming per diem

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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

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Travel Expense Checklist




All travelers must 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

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Travel Expense Checklist



Grantee **must** 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

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Texttravel – Hotel Occupancy taxes Maximum Reimbursement

Fiscal Management

Home / Travel

Meals and Lodging

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.

Home

Rates

Transportation

Meals and Lodging

Exceptions

Miscellaneous Provisions

Examples

Documentation Required

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

08/19/22	ROOM CHARGE	RP1214	239.94	187 on FSR (GSA)
08/19/22	Room Tax	RT1214	28.55	22.25
08/19/22	City Tax	CT1214	10.80	8.42
08/19/22	County Tax	741214	2.40	1.87

Prorated taxes based on \$187 max GSA lodging rate:

$(28.55/239.94)*187=22.25$

$(10.8/239.94)*187=8.42$

$(2.40/239.94)*187=1.87$

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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)

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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 must be included with supporting documents.

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

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Contractual Travel


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

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Travel Expenses Recap

- Submit a complete 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




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Travel Expenses Q & A




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Chapter 10: Grantee Budget/Expense Categories and Required Documentation

Personnel / Fringe Expense Category



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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.

Best Practice

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

No Cost Extensions (NCE)

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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**

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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)

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No Cost Extension PLOE Update

Other Personnel	Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person
Blank on Project	Type Appl. (months)	0	0	0	12	
Program Coordinator	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
Co-Program Director	Type Appl. (months)	12	12	12	12	
	Effort on Project	0.00%	0.00%	0.00%	0.00%	
	Person Months	0.00	0.00	0.00	0.00	0.00
Project Assistant	Type Appl. (months)	0	0	0	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
Program Ass.	Type Appl. (months)	0	0	0	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	Type Appl. (months)	12	12	12	12	
	Effort on Project	0.00%	0.00%	0.00%	0.00%	
	Person Months	0.00	0.00	0.00	0.00	0.00
Program Coordinator	Type Appl. (months)	0	0	0	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
Project Assistant	Type Appl. (months)	0	0	0	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
PIPO/CIOR	Type Appl. (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 Appl. (months)	0	0	0	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	0.00	0.00	12.00	0.00	12.00
Total Person Months Per Year		7.00	9.10	22.00	N/A	48.10

Example of a NCE which resulted in a Year 4 – automatically populates with zeros

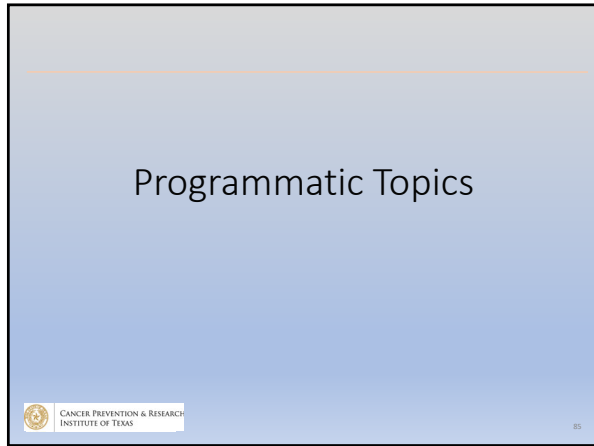
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NCE – Frequently Asked Questions

What research can be conducted during an NCE?

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

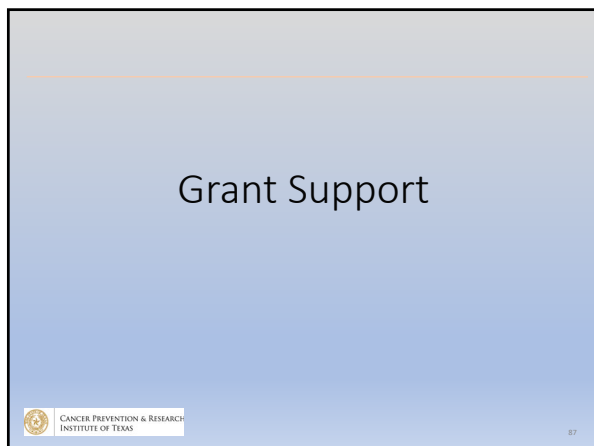
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Points of Contact

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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