Managing Subawards under Carry Forward Restricted Awards – Changes you Need to Know About!

Laurie Register – Assistant Director, Subaward Oversight and Compliance
What has changed?

- iProcurement has been updated to allow invoices to be paid up to 90 days after the task or award end date.
  - The invoice must be matched by AP at the 90 day mark, so invoices must be uploaded for payment several days prior to that date.

- Sponsor subaccounts mean that expenditures are being more closely tracked, and unreported invoices may result in a budget reduction or increased scrutiny for the project.

- Corrections to invoices that hit the suspense PTA due to late invoicing by the subrecipient or late upload by the department will no longer be made.

- Not a recent change, but invoices must be posted to be included in the financial report. Anticipated invoice amounts will not be accepted.

- Not a recent change, but iJournals are not permitted on active subawards to correct invoices.
The challenges of managing subawards

- Subrecipients are submitting invoices after the task or award end dates expecting payment.
- Invoices may be received within the required timeframe, but they are not being uploaded timely.
- Many uploaded invoices are missing the PI signature and required certification language.
- There has been an increased number of requests to correct invoices that have hit suspense PTA’s because the task or awards are no longer open.
- Late final invoices are being applied to the next year funding as pre-award spending, but the reduction of funds for the current year is not taken into account. This leads to a shortage of funds when the next year final invoice is received.
- Accounts Payable is paying invoices on other lines, rather than the current PTA.
- Invoice was uploaded on time, but the PO is in requires-reapproval status and the invoice wasn’t routed until the task closed.
What Can you Do?

- Subrecipients are submitting invoices after the task or award end dates expecting payment.
  - Let the subrecipient know late invoice may not be paid.
  - Ask your OSR officer to add language to the amendment that late invoices may not be paid.
  - Do not pay the invoice.
  - The PI can pay from their departmental account.

- Invoices may be received within the required timeframe, but they are not being uploaded timely.
  - Improve subaward oversight processes to ensure invoices received from the subrecipient are reviewed, signed by the PI, and uploaded in a timely manner.
  - The PI can pay from their departmental account.

- Many uploaded invoices are missing the PI signature and required certification language.
  - The person uploading the invoice certifies that the PI signature and certification language are included with the invoice. Check to make sure both of these are in place before uploading.
What Can you Do?

- There has been an increased number of requests to correct invoices that have hit suspense PTA’s because the task or awards are no longer open.
  - Corrections to invoices that hit suspense PTA’s due to late invoicing by the subrecipient or late upload by the department will no longer be made.
  - If you are planning on applying the late invoice to next year or carryforward funding, wait to upload until the additional funding is in place, or the carryforward has been moved to upload the invoice.
  - Do not upload the invoice if the task or award is ended.

- Late final invoices are being applied to the next year funding as pre-award spending, but the reduction of funds for the current year is not taken into account. This leads to a shortage of funds when the next year final invoice is received.
  - If the late invoice is being applied to the current year because you are waiting on carryforward approval, make sure to submit a change order to move the funding onto the new PTA.
  - If the late invoice is being applied to the current year as pre-award spending, make sure the subrecipient knows their current year funding will be reduced by the invoice amount so you don’t have a shortfall at year end.
What Can you Do?

- Accounts Payable is paying invoices on other lines, rather than the current PTA.
  - Write the line(s) you want the invoice applied to on the invoice.
    - The system will often pay to the oldest open line, even if the task or award are closed.
  - Make sure the line you want the invoice applied to has:
    - An open task and award
    - Enough funding to cover the invoice
    - The correct PTAE in place
    - The task is set up for expenditure types 54710 and 54720

- Invoice was uploaded on time, but the PO is in requires-reapproval status and the invoice wasn’t routed until the task closed.
  - Upload all invoices for payment at least a day before you submit a change order.
  - If the change order has taken so long that the end of the 90 days is approaching, and the invoice will hit the suspense PTA if not routed, contact Laura Register.
Tools to Help Manage Subaward PO’s

- Requisition and Purchase Orders Query can help you:
  - See the commitment to the subrecipient
  - See how much funding is remaining
  - See the status of the PO
    - Incomplete, Requires-Reapproval, Approved
  - See what lines and PTAE’s have funding remaining
  - Upload invoices
  - See your uploaded invoices and their status
  - See where your invoices were applied

- Fund Title Query
  - Check task and award start and end dates
Questions?

Laura Register
Laregist@Stanford.edu
303-838-2163