OSR Post Award Management: “Don’t We Just Catch That at Closeout?”

OSR & SeRA Seminar Series

Tim Reuter, Director Post Award Operations
Office of Sponsored Research
We will review and discuss

- Overview of Roles and Responsibilities
- The single most important thing you can do!
- Proper reviewing of agreement terms to maintain post-award compliance
- PTA setup best practices for efficient financial management, expenditure review and reporting
- Setting-up chronological checkpoints and expenditure burn-rate monitoring
- Leveraging Oracle Business Intelligence and Consolidated Expenditure Reporting to analyze financial data
Roles and Responsibilities

Who is responsible after the award is received for managing during the life of the award?

• **OSR Post Award is responsible for:**
  • Establishing the PTA in Oracle with allowable ETs (Templates)
  • Preparing and filing interim and final financial reports
  • Submitting invoices and collecting payments

• **Departments and PIs are responsible for (Sponsored Projects Maintenance Schedule):**
  • Reading the Notice of Award both internal and Agency NOA
  • Timely processing labor and non-labor charges
  • Reviewing/approving non-labor charges i.e. POs, expense reimbursements, pcard purchases etc.
  • Initiating and updating sub-award POs, ensuring PIs approve sub invoices, and following-up on unpaid or missing invoices
  • Communicating changes to staff and labor allocations
  • Reviewing expenditures monthly and certifying quarterly
  • Monitoring spending levels and commitments during award budget period
  • Requesting NCX, changes in Key Personnel or effort reductions
  • Being prepared for the timely closeout with OSR

❖ **The 90 DAY PERIOD AFTER AWARD ENDS IS FOR OSR TO PREPARE FINANCIAL REPORT AND SUBMIT FINAL INVOICE OR DRAW FUNDS. IT IS NOT FOR DEPARTMENTS TO CHARGE ADDITIONAL EXPENSES**
What is normally the largest expense on an award?

- Salary and or Stipends along with the applicable Fringe Benefits and F&A costs account for 60-70% of most award costs.
- Stanford Policy requires some PI effort
- Most federal awards require the PI/PD and Key Personnel named in the Notice of Award to meet at least 75% of their proposed effort or explicit sponsor prior approval of any significant (more than 25%) effort reductions.
- Certain Awards have unique salary/effort requirements
  - NIH K awards, Training Grants or Fellowships
  - Some Foundations or Health Organization Awards
Communicate

• Share the wealth - Communicate timely changes and/or potential changes to your Pre-award and Post Award contacts.

• Tell the story - Do not make us ask the question three years after a PI requested a reduction in effort. Let us know and document the change when it happens. Also provide more complete justifications in Cost Transfers.

• Pay it forward - You may not be in the department three years later, so your successor may not know at closeout
The Golden Rule

Ask for permission, not for forgiveness

Why?

We want to help you get to YES!
Order of Precedence

- **Sub Award Terms**
- **Prime Award Terms**
- **Program Announcement**
- **Agency-Specific Terms**
- **Research Terms and Conditions**
- **Uniform Guidance**

**Public Laws**

**Institutional Policies**

**Common Sense**
Read the Notice of Award

- Stanford has 5,000 active awards and all are unique. No two are the same. Understand the type of award you are managing.
- Some “good nuggets of info” are in there
- Unique Ts & Cs i.e. “gotchas”
  - Expenditures treated uniquely by Sponsor
- Applicable Research Ts &Cs
- Carryover – Allowable or requires approval
- Contacts for Administration and Interpretation of Grant Admin policies and provisions
- Many State, Foundations and Health Organizations have requirements for re-budgeting or limits on certain types of costs
- Many non-federal awards require rebudgeting for expenses > 10% per category
Account Set-up Best Practices

• Early Accounts Eliminate Many Cost Transfers = Less Work for the Dept!
• OSR and RFCS have turned off certain ETs to limit the use of unallowable costs
• You can request ETs be turned on using the **OSR Request Form** in SeRA
• Special ETs
  • Computers & Computing Devices ET 55116
  • Food ET 52355 (Turned off on all Federal set-ups)
  • SU Net ID Charges ET 58450
• Expenditures treated uniquely by Sponsor
  • NSF Participant Support Costs
  • Salary limits per year and Travel limits on AHA
Setting Up Checkpoints

- OSR is changing our focus to partner with departments during the life of the award
- Setting reminders at 3, 6 and 9 months to review effort and other unique Ts & Cs - [Sponsored Projects Maintenance Schedule](#)
- Utilize OBI reporting to do your own mini audit to identify unallowables and develop reports for your PI
- Makes for a Smoother closeout
- No loss of funds for department/PI
- More F&A Recovery to Stanford
- Less negative publicity impacting reputation and possibly donations
Changes to Cost Transfer Policy

- I am seeing many cost transfer requests with little or very poor justifications. You should “tell the story” so someone reading it years later can understand why you are moving the costs. “To correct an error” “the adjustment is made to reflect the (insert name) actual effort”.
- Clearly defined 6 month time period as GL periods
- All “Late” cost transfers require a School Level approval email – not as an approver on the ijournal
- Restated and re-emphasized the importance of addressing all requirements in the justification and not merely stating “this cost transfer is allowable, reasonable and allocable”
- Defined when a pdf copy of the General Ledger must be attached to Non-salary cost transfers
- Effective Date: For all cost transfers processed with a GL date of January 2017 and forward
Closeout

• Help us help you! Ideally the DFA should tell OSR “ready to close”
• Review and Manage the Salary/Effort
• Setting reminders at 3, 6 and 9 months to review effort and other
Unique Ts & Cs - Sponsored Projects Maintenance Schedule
• Closeout within 90 days
• Cost Transfers are High Risk
• Overdrafts – need them removed quickly to allow for full final billing and reduces follow-up
• The 90 DAY PERIOD AFTER AWARD ENDS IS FOR OSR TO PREPARE FINANCIAL REPORT AND SUBMIT FINAL INVOICE OR DRAW FUNDS. IT IS NOT FOR DEPARTMENTS TO CHARGE ADDITIONAL EXPENSES
Questions?
We’re All In This Together!

Tim Reuter
Director Post Award Operations
Office of Sponsored Research
treuter@stanford.edu
(650) 721-1758

Megan Dietrich
Client Advocacy and Education
Office of Sponsored Research
reymar@stanford.edu
650-721-2236
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