

Research Administrator's Forum

School of Medicine

May 7, 2004

Presented by Sponsored Projects Accounting

Subrecipient Monitoring

Roles and Responsibilities

- PI's: Primary responsibility for the monitoring subrecipients.
- Dept. Administrators: Assist PI in discharging their monitoring responsibilities.
- SPA: Ensure WU's subrecipient monitoring policies and procedures are compliant with Federal and WU policies. Provide training, monitoring and guidance.

“Risk-based” Approach

- **Size of subrecipient award**
 - Large: annual budget >\$500k
 - Mid-size: annual budget \$100 - \$500K
 - Smaller: annual budget <\$100K
- **Award size relative to sub’s total research portfolio**
- **Award complexity, sensitivity or extensiveness of governing regulations.**



“Risk-based” Approach, cont.

- **Sophistication of sub’s systems and administrative operations.**
- **Prior experience with sub.**
- **Sub’s location (remote, for-profit, international...).**
- **Degree of external oversight by auditors or sponsoring agencies.**

Monitoring Procedures

- **Technical Reports – PI should review and evaluate technical reports in a timely manner. Unusual or unforeseen should be investigated.**



Monitoring, cont.

- **Invoices and Budget – compare invoices to subaward budgets to ensure that charges:**
 - Appear reasonable based on technical progress of the projects
 - Are within the budget parameters
 - Are consistent and timely



Monitoring, cont.

Clarification of Invoiced Charges

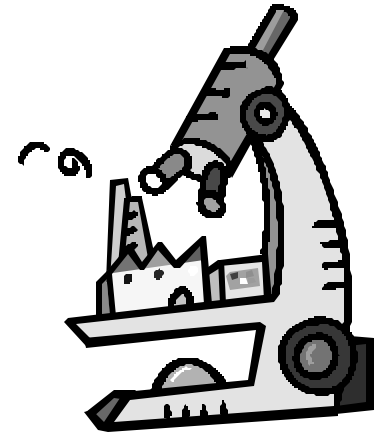
- Request explanations for any “unusual”, “miscellaneous”, “other” or apparently excessive charges.
- If explanations received are not sufficient for a prudent judgment
 - Request detailed documentation such as; payroll records, copies of paid invoices, travel reports, consultant reports...



Monitoring, cont.

If questionable costs remain unresolved:

- On-site Visits – PI evaluates compliance with scientific objectives, administrative systems, documentation.
- Audits – Formal audit procedures applied to amounts charged by sub. Contact SPA to coordinate.



Annual Sub Audit Verification

- **SPA will verify if sub has completed it's OMB Circular A-133 audit.**
- **SPA will send documents to sub on an annual basis**
 - **A-133 Audit Information Request**
 - **Federal Subrecipient Questionnaire**
 - **Vendor Tax Information Request**

NIH Training Programs

Kirschstein National Research Service Awards (NRSA)

- **Institutional Research Training Grants
– T32, T34, T35**
- **Individual Fellowships – F30, F31, F32,
F33**

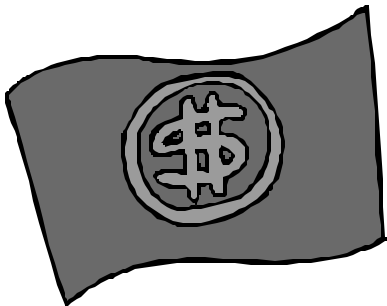
Trainee/Fellow Commitment

- **Research trainees or fellows are expected to devote full time to proposed research training.**
- **Devote at least 40 hours per week to the program.**



Stipend Supplementation

- **May supplement stipend from non-federal funds, without obligation to trainee.**
- **Federal funds may not be used unless specifically authorized in the program.**
- **Under no circumstances may PHS funds be used for supplementation.**



Stipend Supplementation, cont.

- **Stipend supplementation for trainees is considered voluntary cost sharing.**
- **Supplements must be charged to a “V” account. Debit accounts should be a non-federal source.**
- **A non-federal grant should not be used as a debit account unless stipend supplementation is allowable under the terms of the agreement.**

Stipend Supplementation, cont.

- **Stipend supplementation must be recognized/coded as a stipend and not salary.**
- **Stipend supplementation should be paid from buob 26.**
- **Salary buob's 11, 12 or 13 cannot be considered stipend supplementation.**

NIH Trainee Compensation

- Trainee may seek part-time employment coincidental to their training program.
- Compensation may be paid to trainees only when:
 - Employee – employer relationship
 - Payments are for services rendered
 - Follow institutional guidelines and are consistently applied to federal and non-federal sources.

Compensation, cont.

- **Funds provided for compensation are allowable to Federal grants, including PHS/NIH.**
- **Compensation from research grants will be for limited part-time employment from the normal full-time training activities.**
- **Paid as salary/wages, not considered stipend supplementation.**

Compensation, cont.

- **Compensation may not be paid from a grant that supports the same research that is part of the trainee's planned training experience.**
- **Project Director must approve all instances of employment on research grants, to verify that this work will not detract from or prolong training program.**

Project Director Approval

- Explain how the compensated activities are separate and distinct from the training program.
- Explain time/effort involved in compensated activity and how it will not effect training program.
- SPA strongly suggests that the Project Director's approval is documented in writing.
- Send copy of approval to SPA for inclusion in training grant file.

HRMS Setup

- Trainee must be assigned a separate Employee ID for salaries and wages (non-employee vs. employee)
- Determine Job Type
- Determine monthly (exempt) or biweekly (non-exempt) based on job code.
- Utilize boub 11,12 or 13.

PAR's

- **Stipend recipients do not receive PAR reports.**
- **Stipend is not considered payment for services rendered.**
- **Trainee compensation from a sponsored project will generate a PAR.**
- **PAR report will be inaccurate because it does not include the stipend.**

PAR Certification

- Trainee must manually revise PAR to accurately reflect the actual percentage of time related to compensation.
- “Figure on grant XXXXX was revised to reflect actual effort on the project, in conjunction with my stipend from training grant 5XXXX. No subsequent PCT is required.”

Food Costs

- Refreshments at lectures for trainees cannot be charged to the grant.
- Lunch or dinner (for the trainees or project director) with the guest lecturer cannot be charged to the grant.
- These costs should be charged to non-federal (department) sources.



Fiscal Year End



Closing Data

- **New year-end website**
 - <http://aisweb.wustl.edu/spweb.nsf/pages/YearEndClosing>
- **Fiscal Year End Closing Action Plan for 2004 (“May Letter”)**

Deadlines – SPA Funds

- **June 30: Purchase orders, check requests, inter-department orders**
- **July 8: PCT's for FY 04, submitted to Payroll by noon.**
- **July 12: Journals by noon. Strongly suggest submitting on-line by July 11.**
- **July 13: Overhead and cost sharing**
- **July 19: Budget adjustments**

Deadlines, cont.

- **Transactions that contain both SPA and department accounts/funds may have different deadline dates.**
- **Consult Fiscal Year End Closing Plan for FY 04 that was distributed by Accounting Services.**

Approval Tips

- **Include trail-doc to justify how item benefits scientific nature of project for buob's: 3403, 3411, 3420, 3440, 3455, 3540, 3550, 3553, 3575, 3576 and 63.**
- **Include consultant form for buob 3000-3003**
- **Remove sales tax from check requests**

Approval Tips, cont.

- **Separate registration expense into buob 3605 on Travel Reports.**
- **Cross reference transactions for journals.**
- **Include F&A adjustment, when applicable, on BA's.**

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