Grants Management in a Department/Division

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Outline

• Department/Division vs Central office
• Relationship with PIs
• Funding Types & Sources
• Pre-Award submission stuff
  – Subs
• While you're waiting & JIT
• Post-Award management
  – Reports
  – Monitor/control spending
  – Cost transfers
• Closeout
Who’s in the audience?

**Are you in a:**
- A. Department
- B. Central office
- C. Other

How long have you been in your current role?
- A. 0-1 year
- B. 1-3 years
- C. 3-5 years
- D. 5-10 years
- E. 10+ years. (I look so young because I started before child labor laws)
Department vs Central Office

Central Office
- Signing official(s)
- 50,000 foot level
- Watch money
- Policy makers
- Official recipient of grant
- Worried about auditors

Central Office vs Department

Department
- PI
- In the weeds
- Spend money
- Policy followers (we hope)
- Think they're the official recipient of grant
- Doers of science
Relationships with PIs (The kind HR approves)

- Trust
- Know their interests
  - Read their papers
  - Read their grants
  - Attend their seminars
  - Go to their lab
- Give them what they want
- Accounting and management are not taught in med school, natural sciences, chemistry, physics, etc.

Funding Types & Sources

NIH grant types:

- Research Grants (R series)
- Career Development Awards (K series)
- Research Training and Fellowships (T & F series)
- Program Project/Center Grants (P series)
- Resource Grants (various series)
Finding Funding Opportunities

- **Online funding websites**
  - Grantsnet - [http://sciencecareers.sciencemag.org/funding](http://sciencecareers.sciencemag.org/funding)

- **Federal agency funding websites**
  - DHHS - [http://www.hhs.gov/grants/](http://www.hhs.gov/grants/)
  - NIH - [http://grants1.nih.gov/grants/oer.htm](http://grants1.nih.gov/grants/oer.htm)
  - AoA - [http://www.aoa.gov/AoARoot/Grants/Funding/index.aspx](http://www.aoa.gov/AoARoot/Grants/Funding/index.aspx)
  - CDC - [http://www.cdc.gov/](http://www.cdc.gov/)
  - FDA - [http://www.fda.gov/](http://www.fda.gov/)
Finding Funding Opportunities

- **Non-federal sponsor funding sites (also proposalCENTRAL)**
  - American Cancer Society - [http://www.cancer.org/index](http://www.cancer.org/index)
  - American Heart Assoc. - [http://www.heart.org/HEARTORG/](http://www.heart.org/HEARTORG/)

Elements of Funding Opportunity

- Funding Opportunity Description
- Award Information
- Eligibility Information – *Read the RFA!*
- Application and Submission Information
- Application Review Information
- Award Administration Information
- Agency Contacts
- Other Information
Starting the Grant Application Process – Dept

• Communication is key!
  – Work closely with your faculty to ensure everyone is on the same page regarding the grant application (due dates, forms required, responsibilities, etc.)

• Read the RFA
  – The RFA/grant guidelines will provide guidance as to what is allowable/not allowable on a particular grant application

• Timeline
  – Stick to your timeline!
  – Every step of the application takes time

Setting weekly meetings with faculty help to keep everyone on track with the timeline

• Type of Application
  – New
  – Renewal
  – Continuation

• Typical Required Forms
  – Specific Aims
  – Research Strategy
  – Biosketch of PI and other key personnel
  – Budget
  – Budget Justification
Pre-Award Submission, continued

– Letters of Support
– Facilities and Resources
– Various Other Forms
– Consortium Agreements (sub paperwork)
  • Face page
  • Budget
  • Budget Justification
  • Checklist
  • Scope of Work
  • PI biosketch
  • Letter of Intent
  – Depending on the sponsor they might want all of the above documents.

Pre-Award Submission, continued

Combined Application

– Once the required forms are completed, a combined application will be created.
– Review, review, review!
  • Even though the combined application is created….this does not mean everything is perfect.
  • Tips to watch for when reviewing:
    – Greek symbols that turn into squares in your PDF document.
    – Application combined in proper order.
    – Tables and Graph are readable (not fuzzy, words are legible).

• Internal Approval Process
  – Various levels of internal approvals need to occur before a combined grant application can be submitted to the sponsor.
– Internal approvals on the division side and at the central office level.
– Compliance – at our institution all grant applications have to go through the central office (sponsored programs pre-award) to ensure compliance with institutional policies before being submitted to an external sponsor.

• Submission of Combined Application
  – Depending on who your sponsor is, the combined grant application may be submitted through grants.gov, proposal central, a sponsor website or simply by email.

Starting the Application Process – Central Office

• When a combined application is received by the central office, they start their review process.

Time = Quality of Review

• Large quantity of time = High quality review of application.
• Small quantity of time = Low quality review of application.
• This is why on the division side we need to stick to our timelines.
Pre-Award Submission, continued

- If the central office has changes…
  - That means the combined application is routed back to the division to correct the changes.
  - Once changes are made, the combined application is then routed back to the central office for review again.
- If the central office approves of the combined application, submission can occur.
  - Depending on the sponsor – the central office may complete the submission process or the division may complete the submission process.
- Submission process complete!

While You’re Waiting & JIT

Waiting and Waiting and Waiting…..

- On NIH awards, the PI of the grant application may receive a JIT or just-in-time request from the NIH.
  - Basically the NIH is requesting updated documents with a quick turn around time.
• Updated JIT documents could be:
  – Current Other Support page
  – Certifications
    • IRB Approval
    • IACUC Approval
    • Human Subjects Education
    • Human Embryonic Stem Cells (specific cell line info)
    • SBIR Funding Agreement
    • STTR Funding Agreement
    • Other Information
      – Revised Budget

• Within the Status module of the eRA Commons, users may see the JIT feature; however information should only be uploaded when requested by the NIH. This notification, sent to the PD/PI only, is NOT a Notice of Award, nor should it be construed as an indicator of possible award.

• The PI needs to work with his division and SPO to facilitate submission of this material through ePAS and thru the Commons.

• JIT information requested includes:
  – other support
  – certification of Institutional Review Board (IRB) approval
  – certification of IACUC approval
  – human subjects training certification for all key personnel
  – other items as requested by NIH
The principal investigator (PI) serves as the primary individual responsible for the scientific integrity and fiscal and administrative management throughout the period of the award.

- Not the signing official
- Not the Dean
- Not the Chair
- Not the president
- Etc.

Department is responsible for:

- Ensuring PI is aware of:
  - Restrictions
  - Limits
  - Spending rates
- Reviewing spending
- Ensuring project complies not only with sponsor policies, but also institution policies.
- Monitor effort
- Award closeout
Receipt of Award

Key items of review in the Sponsored Programs Pre-award office (before award notice is sent to the division) are:

- Pending ancillary reviews (IRB, IACUC, IBC, COI)
- Determine if award requires Sponsored Programs Pre-award contracts review (terms and conditions and/or institutional signature required)
- Review any special terms and conditions
- Review budget for accuracy (F&A Rate, exclusions, etc.)
- In cases where award notices are received directly by investigators or division administrators, they should be forwarded to Sponsored Programs Pre-award immediately for review and processing.

What if the budget is cut?

With this much grant money, the only experiment we can do is “Flip a Coin”!
Basic Cost Guidelines

- Allowable
- Allocable
- Reasonable
- Consistent

Allowability

- Costs must be allocable to sponsored agreements
- Cost must be reasonable
- Costs must conform to any limitations or exclusions set forth in these principles or in the sponsored agreement as to types or amounts of cost items
- Costs must be given consistent treatment through application of the generally accepted accounting principles appropriate to the circumstances
Allocability

- An allowable cost incurred for the benefit of only one project which can be readily assigned to multiple projects which directly benefit from the cost, or is necessary to the operation of the institution
- Relative benefits received
- Approximated through use of reasonable methods
- Without undue effort or cost

Reasonableness

- Reflect the actions that a “prudent person” would take
- Allocable and necessary for the performance of the agreement
- Consistent with ethical business practices and applicable laws
Consistency

- Cost Accounting Standards
- Similar costs incurred in like circumstances

Need to monitor spending

HELLO, I'D LIKE TO ORDER SOME PIPETTE TIPS.

NO, NOT A NICE ORDER, JUST A COUPLE OF -

THANK YOU, BUT I ONLY NEED A SMALL AMOUNT TO -

LOOK, I DON'T CARE! I'M A POSTDOC ON A TIGHT GRANT, AND I ORDER MY STUFF RESPONSIBLY!

NOW, WOULD YOU PLEASE -

...REALITY?

...AND YOU'LL PRINT MY FAVOURITE MOLECULE ON THE MUG?

SO WHY DO YOU NEED SIXTY THOUSAND PIPETTE TIPS AGAIN?

PIPETTE TIPS

IT'S CALLED RESPONSIBLE ORDERING!
Cost Transfers, Overruns and Accelerated and Delayed Expenditures

Compliance is…..

• The effective management of public funds to maximize research outcomes

• The avoidance of fraud, institutional mismanagement and poor management of Federal Funds

• An institutional commitment
Who is Responsible?

At the institution
- Authorized Organizational Official
- Principal Investigator
- Departmental Administrator

Internal Policy Summary

90 Day Rule

- Correction must be made within 90 days of the date an error is detected.
- Transfers beyond 90 days require the Principal Investigator (PI) signature
Policy Summary cont.

Documentation
Clearly explain situation requiring transfer…so that an auditor would understand.
• A statement of “to correct error” or “to transfer to correct project” in not adequate.
• Reason why “old expense” was wrong
• Justification for why “new expense” is right
  – With appropriate certifications and approvals
• Explanation of changes that were made to correct problem going forward
  – If adjustment is very dated

Policy Summary cont.

Unallowable Items
• Parking of costs

• shall not shift any costs allocable to a particular sponsored program to any other sponsored program to meet deficiencies caused by overruns, to avoid restrictions imposed by law or terms of the sponsorship agreement, or for any other reasons of convenience
Settlements in Recent Years

- Yale
  - Initial questioned costs of less than $200,000 related to cost transfers/effort
  - Final settlement $7.6 million
    - $3.8 million damages, $3.8 million penalties
- Florida International
  - $11.5 million, cost transfers issues, grants used as holding accounts
- Mayo Clinic
  - $6.5 million, over-expenditures, cost transfers

Closeout of an Award from the Division Perspective

- In the last year of an award, all members of the division (grants manager, lab manager, faculty, etc.) need to work together to ensure no “surprises” are awaiting them at the end of a grant.
  - This is why monthly monitoring of financial reports are key to a grant closeout.
  - Communication plays a large part in successful financial monitoring up to the closeout stage and throughout the closeout stage.
• Communication with the sponsored programs accounting post-award (central office)
  – Financial Reconciliation will need to occur, typically this starts in the post-award office
  – The grants manager in the division will need to work with lab managers to ensure Purchase Orders are closed out in a timely manner
  – The grants manager in the division will need to ensure effort for the people being charged to the grant are moved off of the grant.
  – Final closeout entries will need to be made to move overage off so the actual expenses tie out to the budget amount.

Final Financial Report
• When the financial reconciliation has been agreed upon by both the division and the post-award office, the final financial report will need to be submitted to the sponsor.
  – NIH grants – the FFR is submitted on the eRA Commons website
  – Non-NIH grants – maybe submitted on the Proposal Central website
  – Non-NIH grants – maybe submitted on the sponsor’s website
  – Non-NIH grants – maybe submitted via email
• Internal closeout of grant in system
  – Account strings/projects need to be closed (hard stop) in your institution’s internal systems.
Questions

Thank you