

Florida Research Administration Conference (FRAC)

#### WELCOME

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### **General Procurement Standards**

§ 200.318(c)(1)

The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection award and administration of contracts.

How does or will your institution meet the conflict of interest requirement?



#### **General Procurement Standards**

§ 200.318(h)

The non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as **contractor integrity**, **compliance with public policy**, **record of past performance**, and **financial and technical resources**.

How does or will your institution measure contractor integrity, compliance with public policy, record of past performance and financial and technical resources?

What processes are in place to document the contractor criteria?



#### **Methods of Procurement**

§ 200.320

The non-Federal entity must use one of the following methods of procurement:

- (a) Procurement by micro-purchases ...dollar amount does not exceed \$3,000
- (b) Procurement by small purchase procedures that do not cost more than the Simplified Acquisition Threshold (\$150,000). If small purchasing procedures are used, price, or rate quotations must be obtained from an <u>adequate</u> number of **qualified sources**.
- (c) Procurement by sealed bids
- 1. What affect will purchases exceeding \$3,000 have on your institution?



### **Methods of Procurement - §** 200.320

- 2. How will your institution track and store price or rate quotations for purchases exceeding \$3,000.
- 3. How will your institution track and store price or rate quotations for P-card transactions?
- 4. Does/will your institution use strategic sourcing to meet the purchasing requirements?



#### **Subrecipient Monitoring and Management**

§ 200.331 Requirements for pass-through entities

(b) evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward...

(1) The subrecipient's prior experience;

(2) The results of previous audits;

- (3) Whether the subrecipient has new personnel or new or substantially changed systems;
- (4) The extent and results of Federal awarding agency monitoring
- (c) Consider imposing specific subaward conditions upon a subrecipient (§ 200.207).
- (d) Monitor the activities of the subrecipient
- (1) Review financial and programmatic reports
- (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies...
- (3) Issue a management decision (§ 200.521)

How will your institution meet these requirements?



### § 200.332 Fixed amount of subawards

With prior written approval from the Federal awarding agency, a pass-through entity may provide subawards based on fixed amounts up to the simplified Acquisition Threshold (\$150,000) provided the subawards meets the requirements for fixed amount awards in § 200.201.



§ 200.201 Use of agreements (including fixed amount awards), cooperative agreements, and contracts.

- (b)(1) Payments are based on meeting specific requirements of the Federal award. Accountability is based on performance and results.
- (2) A fixed amount award cannot be used in programs which require mandatory cost sharing or match.
- (3) The non-Federal entity must certify in writing to the Federal awarding agency or pass through entity at the end of the Federal award that the project or activity was completed or **the level of effort was expended.**

How will these requirements affect your subcontract purchasing process?

What changes will you need to make to meet these requirements?



### **Subpart E - Cost Principles**

- § 200.453 Materials and supplies costs, including costs of computing devices
- (c) In the specific case of computing devises, charging as direct costs is allowable for devices that are <u>essential</u> and <u>allocable</u>, but not solely dedicated, to the performance of a Federal award.

How will you determine if the devices are essential and allocable? How will you prorate computing device costs that are not solely dedicated to one award?



**Subpart E – Cost Principles** § 200.461 Publication and printing costs

(a) If these costs are not identifiable with a particular cost objective, they should be allocated as indirect costs to all benefiting activities of the non-Federal entity.

How will you track publication costs for each cost objective (award)?

(b) Page charges for professional journal publications are allowable where:

(3) The non-Federal entity may charge the Federal award before closeout for the costs of publication or sharing of research results if the costs are not incurred during the period of performance of the Federal award.

Publication costs incurred outside of the period of performance are allowable?



### **Subpart E – Cost Principles**

§ 200.474 Travel costs

(c) (1) Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences is allowable...

Will this be allowed under your institution's travel policy?



#### **Subpart E – Cost Principles - §** 200.474 Travel costs

(d) Commercial air travel

- (1) Airfare costs in <u>excess of the basic least expensive unrestricted</u> <u>accommodations class</u> offered by commercial airlines are unallowable except when such accommodations would:
- (i) Require circuitous routing;
- (ii) Require travel during unreasonable hours;
- (iii) Excessive prolong travel;
- (iv) Result in additional costs that would offset the transportation savings;
- (v) Offer accommodations not reasonably adequate for the traveler's medical needs.

Will your institution allow unrestricted accommodation class airfare? Will your institution allow costs in <u>excess of the basic least expensive</u> unrestricted accommodation class?



### Questions & Comments

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