

Pre-Award Preparation - Post-Award Compliance

Minimizing Disconnects

(How to win friends, influence people, and keep yourself out of trouble)

Katie Watkins-Wendell, CRA, CFRA The University of Akron At-Large Board Member and Membership Committee Chair, SRA International

The Basics

- What is "pre award" at your institution ?
 - Seek funding opportunities
 - Grant writing
 - Proposal submission
 - Award acceptance
 - Contract negotiation
- Where does it happen?
 - Joint pre/post
 - Separate pre/post
 - Departmental vs. Central



Everybody Loves You When You are Preaward!



- What is "post award"* at your institution?
 - monitoring spending
 - billing collecting
 - budget and cost transfers
 - effort reporting
 - no cost extensions
 - closeouts
 - Where does it happen?

And what about Compliance?



*Aka: The People Who Must Say "No" (over and over again)



Pre and Post: More alike than you think!

Both must:

- Read and <u>understand</u>
 - program guidelines
 - award terms and conditions



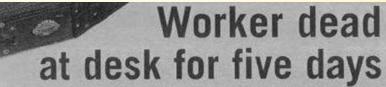
- Understand and know how to operationalize institutional policies and procedures (purchasing, HR, union contracts, etc.)
 - Recognizing that they may be more stringent than the grant terms and conditions
- Communicate

But we face challenges....



Administrative Edicts

Federal Regulations Sponsor Regulations Institutional Regulations Unfunded Mandates



From the New York Times: Bosses of a publishing firm are trying to work out why no one noticed that one of their employees had been sitting dead at his desk for five days before anyone asked if he was feeling okay. George Turklebaum, 51, who had been employed as a proof-reader at a New York firm for 30 years, had a heart attack in the open-plan office he shared with 23 other workers.

He quietly passed away on Monday, but nobody noticed until Saturday morning when an office cleaner asked why he was working during the weekend.

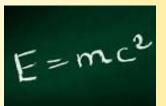
His boss, Elliot Wachiaski, said: "George was always the first guy in each morning and the last to leave at night, so no one found it unusual that he was in the same position all that time and didn't say anything. He was always absorbed in his work and kept much to himself."

A post mortem examination revealed that he had been dead for five days after suffering a coronary. George was proofreading manuscripts of medical textbooks when he died.

You may want to give your co-workers a nudge occasionally. The moral of the story. Don't work too hard. Nobody notices anyway.

X

Common Sense?



- Allowable
 - Pre award budgets = post award expenses; do regulations allow?
- Allocable
 - What project(s) or people benefit from these activities?
- Reasonable
 - Would a "prudent person" make this expense?
- Consistent
 - Are all expenses treated similarly (in like circumstances)?
- Direct Costs
 - Identified to an activity
- Indirect Costs
 - Not directly identified to an activity
- Cost Sharing
 - Costs not borne by sponsor



People

• Effort

- Proposals submitted > 100% ok
- Awards received > 100% not ok
- Salary caps
- Inflationary increases
- Types of personnel
 - Part-time vs. full-time
 - Fringe benefits
 - Hourly student vs. assistantship
 - How to treat tuition remission
 - Employee vs. consultant
 - Ramifications of incorrect classification



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Why does it matter?



Budget and Expense

- Supplies
 - No general supplies in budget
 - Exceptions?
 - Supplies remaining at the end of the grant period
- Travel
 - Limits?
 - Foreign travel
- Equipment
 - who accounts for it?
 - what happens to it when the project ends?
 - what about maintenance?
 - fabrication vs. acquisition
- Patient care
 - Costing of required procedures





Cost sharing

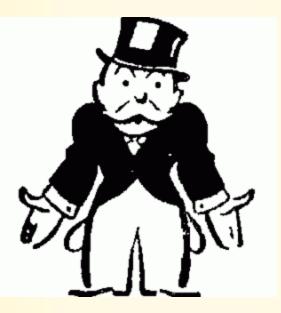
- Is it <u>required</u> and <u>necessary</u>?
 - Mandatory
 - Voluntary Committed
 - Voluntary Uncommitted
- At what level and who commits?
 - Sign offs for resources
 - Money vs. in-kind
 - Cost share by collaborators
 - Documentation
- Does cost share enhance the proposal's competitiveness?





Can We Do This?

- Expanded Authorities
- Can post award handle reporting requirements?
 - Receipts?
 - Monthly billings?
 - Timesheets?
- What happens when we don't get paid?





Paying the Piper

Indirect Costs

– Preaward

- Full IDC in proposal?
- Sponsor's written policy
 - Who covers the difference?
- IDC waivers
- Recovered IDC distribution
 - Avoid problems when returning recovered IDC to PIs





Responsibility Issues

Who is responsible, who accepts risk?

- What do your institutional sign-offs mean?
 - Fiscal responsibility for cost overruns
 - Resources available to conduct work
 - PI release time / replacement costs
 - Compliance with Terms & Conditions





Regulatory Compliance

Human Subjects

- Certifications and approvals
 - Risks of not obtaining prior approval
- Institutional Review Board
 - Approval delays / protocol revisions
- PI pressure
- Adverse events
- Who bears the cost?



Regulatory Compliance



Animal Subjects

Assurances
USDA and OLAW

Per Diems

Who bears the costs?

Adverse events

Actual mousecicle found in the Watkins' garage



Regulatory Compliance

Hazardous materials

- Licenses and notifications
- Chemical Hygiene Plan
- Radiation Safety
- Biohazards



When do we know? Who pays?

Intellectual Property

Patents and copyrights

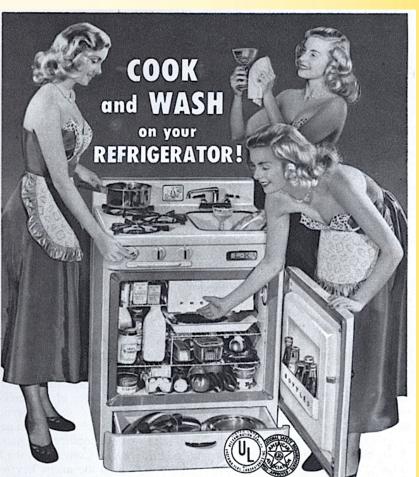
- Institutional policy
- Who must be notified?

– Disclosure in proposal?

Identify confidential information

– Who owns?

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Minimizing Disconnects

- Know where to find policies, procedures and institutional rules
- Ask questions
- No "us vs. them" mentality
- Pre, Post and Department: be a united front to the PI
- Policies and Procedures on the Web
 - Combined or separate
 - Review periodically and update





Minimizing Disconnects

- Pre notify post of upcoming awards (ex. 90-day preaward spending request)
- Post award staff review of proposals likely to be funded, such as appropriations
- Pre award staff review of award terms & conditions
 - Provide post award staff with info on unusual T&C
 - Print on Notice of Award



Minimizing Disconnects Final thoughts

- Location, location, location
 - If not co-located:
 - Weekly 30 or 60 minute roundtables
 - Inter and Intra office Newsletters and e-blasts
 - Informal get-togethers

Even when you <u>are</u> co-located: Wii games and yoga Lunchtime games (Catchphrase, Pictionary) In-office spa day Management-funded lunches and contests Walk-abouts



How UA Builds Camaraderie











Katie Watkins Wendell <u>kwatkin@uakron.edu</u> 330-972-6764 <u>www.uakron.edu/research/ORA/</u>