SRCC Overview

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SPONSORED RESEARCH CONTRACTING AND COMPLIANCE



SR Contracting and Compliance

- Formed in 2009
 - Reorganization of Divisions and Departments
 - Report to Associate Executive Director Sponsored Research Services

Sponsored Research Development

Sponsored Research
Contracting and Compliance

Sponsored Research Administration

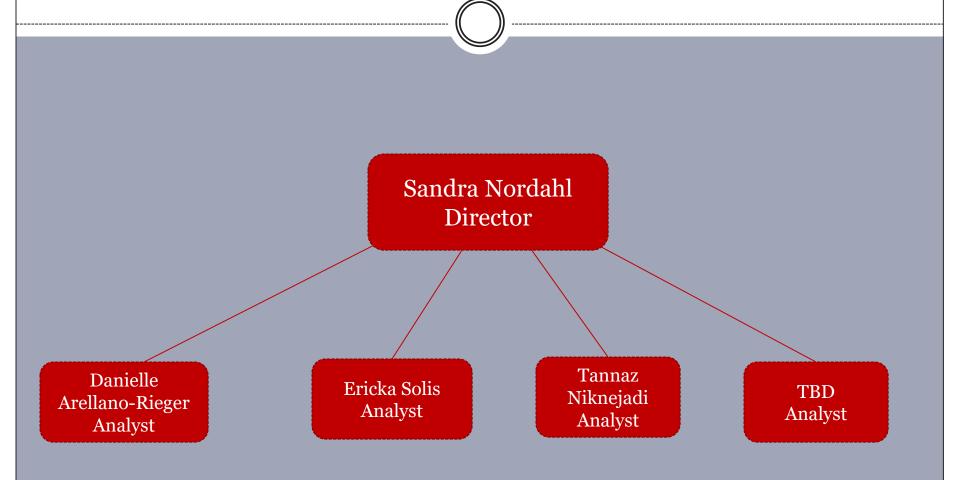
Purpose

- Expedite the review and awarding of projects for faculty and staff
 - Review all incoming awards for all compliance related issues and coordinate with SDSU
 - Negotiate with sponsors regarding contractual language
- Expedite the establishment of subrecipient agreement
 - Prepare and manage through execution all subrecipient documentation
 - Negotiate terms and conditions

Department Structure in Brief

- Award Negotiation and Acceptance Director
- Grant Reviews Analysts
- Compliance Reviews for all awards Analysts
- Subrecipient Preparation and Execution All
 - Compliance Reporting (FFATA, etc.)
- Export Controls Director
- Facility Security Officer
 - Assistant FSO

Department Staffing



Getting the Money...

- Process Incoming Awards
 - Ensuring compliance conditions have been met
 - ▼ Communication with various SDSU compliance related committees and departments
 - Research Affairs
 - Conflict of Interest including all financial disclosures
 - IACUC
 - IRB
 - Environmental Health and Safety
 - Radioactive Materials
 - Biohazardous Materials
 - Carcinogens
 - DEA Materials
 - Hazardous Chemicals

I want the Money... **but...**

Compliance Reviews (animals, humans, FCOI, EH&S...)

Internal
Documentation
(aka –
checklists)

THE AWARD

> Notifications (space, financial disclosure, CFDA)

Banner Entries (7 screens)

Scanning into Nolijweb

Data...

- Where is it derived?
 - FRAPROP conversion from proposal to award status
 - FRABUDP budget matches award or document deviation
 - FWATXTP document Opportunity Number (SRD)
 - FWAWKLD status screen
 - FWARNWL multi-year project renewal data
 - FWAMULY total entry (SRD)
 - FWAPRIP prior status
 - Award Log
 - Review Documents
 - User Defined/Routing Form Reconciliation
- Completed at the following stages:
 - Priors
 - Partially Executed
 - Fully Executed

Also, please...

- Space
- 3rd Party Cost Sharing
- F&A Reduction forms
- CFDA Letters
- Scan all relevant items into Nolij
- Whew... approximately 31 steps to "pass" a basic award

Subrecipient Agreements

Subrecipient Types:

- Federally Funded Research and Development Centers
- For Profit Organizations
- Higher Education
- Hospital/Medical Institutions
- International Collaborators
- Local Governments
- Nonprofit Organizations
- School Districts
- Sole Proprietors

Subrecipient Types

- Action Types:
 - Amendments
 - Collaborative Agreements
 - o Mini-Grants
 - Subagreements
 - Subcontracts

Timelines for Preparation

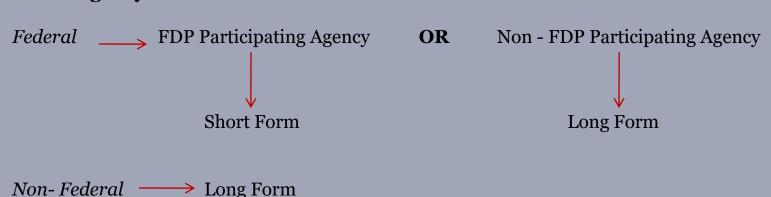
Prompt/Action	Anticipated Time Prior to Award	Prep Time to Delivery
90% and Above Report	At least 90 days prior to receipt	Subagreement – 30 days Amendment – 14 days
Notices : JIT, BAFO, etc.	~ 30-60 days prior to receipt	Subagreement – 30 days Amendment – 14 days
Receipt of Action wo/ Prior Notice	o days prior to receipt	Subagreement – 10-14 days Amendment – 7-10 days
After fact request - Subagreement	o days prior to receipt	Subagreement – 10-14 days
After fact request - Amendment	o days prior to receipt	Amendment – 7-10 days

Factors to consider: When the draft document is presented to PI/Administrator, confirmation of accurate scope of work, budget and reporting requirements are necessary prior to transmittal to subrecipient for partial execution. "Compliance" issues for the PI, project staff and/or subrecipient may delay the full execution of the subaward/amendment (financial disclosure, subcontract procurement form, human subjects approval, IACUC, environmental health and safety, conflict of interest, receipt of A-133 audit, certificates of insurance, RCR plan confirmation, etc.)

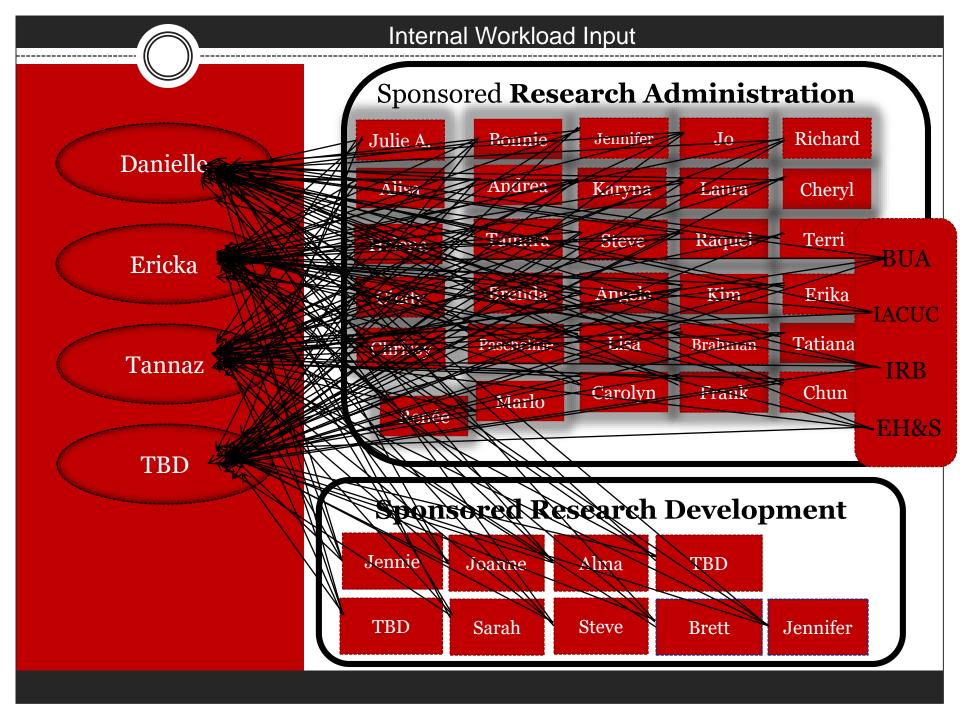
Decisions – What Template to Use

Subrecipient Template Decision Assistant

Prime Agency:



FDP Participating Institutions: National Science Foundation (NSF), National Institutes of Health (NIH), Office of Naval Research (ONR), Department of Agriculture (USDA), Air Force Office of Scientific Research (AFOSR), Army Research Office (ARO), Army Medical Research and Material Command (AMRMC), National Aeronautics & Space Administration (NASA), Environmental Protection Agency (EPA), Department of Homeland Security



The Analyst

- Workday breakdown
 - Non-Exempt Position
 - ★ Work Day = 8 hours (less non-optional lunch break, morning and afternoon breaks 9 hour day with a 7/8 hour day every other week)

 - × 20% reduction in staff in FY 14-15
 - * Any additional hours **must be** charged to overtime
 - Overtime not budgeted

SRCC Workload Ratios

- SR Administration
 - o 1 Analyst for every 7.75 Grants Specialists
- SR Development
 - 1 Analyst for every 2.25 Development Specialists
- Principal Investigators/Project Directors
 - o FY 14-15: 621 1 Analyst provides support to 155 PIs/PDs
- Awards: FY14-15 175 awards processed per Analyst
- Subagreements: FY14-15 193 actions 48/Analyst
- Compliance: FY 14-15 1,726 items 432/Analyst

Streamlining



- Pre-execute
 - NCEs no cost extensions
 - Carry forward/over of funding
 - Termination
- Electronic initiative
 - No scanning required
 - **X** TIF
 - ➤ Drop and drag

Review and Revise

- Most common language modifications/changes
 - Hold Harmless/Indemnification
 - Notices
 - Audit
 - Confidentiality
 - Restrictions on publishing
 - o Termination
 - o Force Majeure

Frequent Partners

- Who wants what?
 - Negotiate mutually acceptable language
 - Develop templates for future agreements
 - Create the resource electronic files

Encumbrance Strategy

- Encumbrances
 - Analysts create for subawards and amendments for all <u>new</u> project periods.
 - Amendments to modify current/past year,
 Analyst will prepare request and forward to
 Techs on behalf of the Administrator.
 - SRA Administrator should disencumber residual balances that do not involve amendment activities (residual balances).

Delays

- Compliance
 - Financial Disclosures not within 90 day window
 - Other compliance issues not resolved
- Award not received
 - Subagreements/amendments cannot be fully executed until award is received.

Communication is the Key

- Clear Communication
- Email to Analyst
 - Acknowledging subagreement on fund
 - Provide pertinent information statement of work, budget and contact information.
 - Advise Analyst of preferred method
 - **▼** Communicate through DS or go direct to project
- Remember Analysts do not have the signature authority
 - Cannot commit funding
 - Create or modify budgets