SRCC Overview

SANDRA M. NORDAHL, CRA
DIRECTOR

SPONSORED RESEARCH
CONTRACTING AND COMPLIANCE

SAN DIEGO STATE
University
Research Foundation
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

Sandra Nordahl
Director

Danielle Arellano-Rieger
Analyzer

Ericka Solis
Analyzer

Tannaz Niknejadi
Analyzer

TBD
Analyzer
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*...

**THE AWARD**

- Compliance Reviews (animals, humans, FCOI, EH&S...)
- Internal Documentation (aka – checklists)
- Banner Entries (7 screens)
- Notifications (space, financial disclosure, CFDA)
- Scanning into Nolijweb
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
  - Mini-Grants
  - Subagreements
  - Subcontracts
## Timelines for Preparation

<table>
<thead>
<tr>
<th>Prompt/Action</th>
<th>Anticipated Time Prior to Award</th>
<th>Prep Time to Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>90% and Above Report</td>
<td>At least 90 days prior to receipt</td>
<td>Subagreement – 30 days</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amendment – 14 days</td>
</tr>
<tr>
<td>Notices: JIT, BAFO, etc.</td>
<td>~ 30-60 days prior to receipt</td>
<td>Subagreement – 30 days</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amendment – 14 days</td>
</tr>
<tr>
<td>Receipt of Action w/o Prior Notice</td>
<td>0 days prior to receipt</td>
<td>Subagreement – 10-14 days</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amendment – 7-10 days</td>
</tr>
<tr>
<td>After fact request - Subagreement</td>
<td>0 days prior to receipt</td>
<td>Subagreement – 10-14 days</td>
</tr>
<tr>
<td>After fact request - Amendment</td>
<td>0 days prior to receipt</td>
<td>Amendment – 7-10 days</td>
</tr>
</tbody>
</table>

**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:

*Federal*  ➔  FDP Participating Agency  OR  Non - FDP Participating Agency

Short Form  ➔  Long Form

*Non- Federal*  ➔  Long Form

**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)
    ▪ ~32 Analyst hours/day       128 Analyst hours/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**
  - 1 Analyst for every 7.75 Grants Specialists

- **SR Development**
  - 1 Analyst for every 2.25 Development Specialists

- **Principal Investigators/Project Directors**
  - 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
    - TIF
    - Drop and drag
Review and Revise

- Most common language modifications/changes
  - Hold Harmless/Indemnification
  - Notices
  - Audit
  - Confidentiality
  - Restrictions on publishing
  - Termination
  - 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 **new** 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