Grant Contract Reporting & Compliance: The Basics

For Investigators & Administrators of organizations receiving funding for Breast Cancer, Spinal Cord Injury or Stem Cell Research

Provided by Extramural Grants Administration
The EGA Mission

Facilitate and support research and education that leads to the treatment, cure and prevention of diseases or health conditions, through consistent program administration that balances the needs of taxpayers and researchers/educators.
Reporting Requirements & Monitoring: Why So Important?

Program Stability – Macro View

- Demonstrates Public Health Impact
- Demonstrates Value of Program
Reporting Requirements & Monitoring: Why So Important?

Program Stability – Micro View

• Accountability
  ➢ Timeliness, Accuracy and Completeness
  ➢ Scientific advancement of public health with taxpayer funds
  ➢ Reasonable and necessary budget workplans
Grants Have Goals

Financial support for an investigator to conduct research in a particular subject area or field, without detailed stipulations as to the direction of the research.

- Contain categorical budgets
- Payment made in advance of expenditures
- Research objectives specified, but with some latitude in the direction the work
- Prior approvals needed for a few changes
Grant Contracts Have Expectations

Financial support for an investigator to conduct research in a particular subject area or field under specific stipulations and conditions.

- Contain line item budgets
- Payment as reimbursement of expenditures
- Specifically define the research to be completed within the contract term
- Specifically define the deliverables, performance measures and time period for completion of activities
- Prior approvals needed for most changes
Topics

• Vouchers, Fiscal Reports & Budget Management
• Progress Reports
• Intellectual Property Activity Reports
• Compliance Monitoring
Vouchers, Fiscal Reports and Budget Management
Grant Contracts

• Fiscal Monitoring Overview

• Voucher and Budget Statement and Report of Expenditures (BSROE)

• Budget Modification Requests

• Carry Forward unexpended funds Requests

• No-Cost time Extension Requests
Fiscal Monitoring

- Separate account established for each project

- Expenses are charged in accordance with
  - Contract Terms and Conditions
  - Salary Rate Limitation
  - Cost Accounting Standards
  - OMB Circulars

- Expenses are appropriately and adequately documented
Expenditure Monitoring

At least monthly, compare actual expenses to the budget to ensure that:

- Budget lines on the contract have not been exceeded
- Budget lines are used appropriately
- Upcoming expenditures will not exceed remaining budgeted amounts for the next period
Accurate Charges

At least monthly, review actual expenses to ensure that they are:

• Accurate
• Reasonable
• Allocable
• Allowable
• Consistently applied
Accurate Charges Continued

• A cost may be considered **reasonable** if the nature of the goods or services acquired reflects the action that a prudent person would have taken under the circumstances prevailing at the time the decision was made to incur the cost.

• A cost is **allocable** to a specific contract if:
  • It is incurred solely in order to advance work under the contract;
  • It benefits both the contract and other work of the organization;
  • And is deemed assignable, at least in part, to the contract.
Accurate Charges Continued

• A cost is **allowable** if it is **reasonable**, **allocable**, and **conforms** to the cost principles and the contract AND is **not prohibited** by law or regulation.

• Contractors must be **consistent** in assigning costs to cost objectives. Although costs may be charged as either direct costs or F&A, depending on their identifiable benefit to a particular project or program, they must be treated **consistently** for all work of the organization under similar circumstances, **regardless of the source of funding**, so as to avoid duplicate charges.
Cost Transfers (charge corrections)

• Must be well-documented

• Must be made within **90 days from the time error was discovered**
  ➢ Erroneous
  ➢ Unreasonable
  ➢ Unallocable
  ➢ Unallowable
  ➢ Inconsistently applied
Vouchers & BSROEs – Why They Matter

Timeliness – Accuracy – Completeness

• Improves entire program cash management; influences current and future year funding for the entire program

• Reimburses you promptly

• Keeps your project on track
Voucher & Budget Statement and Report of Expenditures (BSROE)

- Use Claim for Payment form (AC3253-S) to report quarterly expenditures

- BSROE must accompany and support expenses

- Vouchers are due no later than 30 days after end of quarter and 60 days after end of contract term
Contract Management: Reporting and Monitoring Timeline

Example: 2 Year Contract Timeline
Common Invoice Mistakes

• Voucher missing signature
• BSROE not included
• Budget line(s) exceeded
• Incorrect budget numbers:
  • Outdated budget numbers used
  • Total Budget, not Contract Year Budget used
• Mathematical errors
• Not all funded items listed on BSROE, including Personal Service
Statewide Financial System

http://www.sfs.ny.gov

Integrated system designed to improve efficiency, effectiveness, integrity, transparency and accountability.

ADVANTAGES for VENDORS

• Maintain own contract information
• View voucher payment status
• Electronic payments

COMING SOON

• Enter vouchers and transmit electronically to DOH
BUDGET MANAGEMENT
Justification Required

Be Specific

• Strength of justification is *critical* to approval of the request
• Justification must be tied to progress made on contract aims.
  ➢ Progress to date on each specific aim
  ➢ Plans for use of funds to accomplish stated aims
Budget Modification Requests

Use to move funds between budget lines within a contract year

- Program approval required for all requests
- Office of the State Comptroller (OSC) approval may also be required
- Changes cannot jeopardize ability to complete research aims within contract term
Carry Forward Requests

- Use to move unexpended funds from one budget period to the next
- Due 45 days after the end of the contract year
- 4th Quarter voucher for contract year required to approve request
- Requires EGA and DOH approval
- Progress Report requirements are unchanged
- Funds MUST be carried forward to same budget line
No-Cost Time Extension Request

- Use to allow more time to complete contracted research project
- Funds **must** remain in current budget lines
- Start process **at least six (6) months** prior to end of contract
  - Requires DOH, AG and OSC approval
  - Progress Report required for approval
- Periodic and Final Progress Report still required
Frequent Budget Requests – What’s the Big Deal?

Program Stability

• Carry Forwards and No Cost Extensions negatively impact entire program cash management and current/future year funding for the entire program

Timeliness – Accuracy – Completeness

• Improves entire program cash management; influences current and future year funding for the entire program
• Reimburses you promptly
Progress Report Sections

- Section 1  Cover Page
- Section 2  Lay Abstract
- Section 3  Scientific Progress
- Section 4  Personnel Effort
- Section 5  Other Support
- Section 6  Publications
- Sections specific to funding mechanism (type of contract)
Progress Reports - Timeline

Example: 2 Year Contract Timeline

- Start of Contract
- Progress Report Due
- End Year 1
- Progress Report Due
- Progress Report Due
- Final Progress Report Due
- End of Contract
Progress Reports – Requirements

- **Periodic** (current reporting period) Progress Report due as specified in contract terms
- **Final** (comprehensive) Progress Report due no later than 60 days after contract end, or per contract specifications
- Must be submitted **electronically** in MS Word
- Must be submitted **on current forms**
  *(Initial forms will be provided to you by your Contract Manager)*
- Publications must be submitted as PDF files
Progress Reports – Common Errors

- Insufficient detail provided in Progress Abstract and/or Scientific Progress areas
  - What have you done in comparison to the contract workplan?
  - What issues have come up and how do you propose to address them?
  - What is your plan for work during the next reporting period?
- Personnel Effort changes not explained
- Other Support incomplete or incorrect
- Publications not submitted
Progress Reports – Why They Matter

Program Stability

• Continued funding for each contract (accountability) and the entire program depends on verifiable progress (funding levels)

Timeliness – Accuracy – Completeness

• Reimburses you promptly

• Keeps your project on track
Intellectual Property Activity Report Requirements

• Semi-annual reporting
  ➢ January 1 through June 30 report is due by July 31
  ➢ July 1 through December 31 report is due by January 31

• Must be submitted electronically on current forms
  *(Check program websites regularly for updated forms)*

• Supporting documentation must be submitted as PDF files and marked Confidential or Proprietary
Intellectual Property Reports – Why They Matter

Program Stability

• Demonstrates Value of Program
  ➢ Scientific advancement with public funds
  ➢ Program income
  ➢ Potential economic benefit to NYS

Timeliness – Accuracy – Completeness

• Reimburses you promptly

• Keeps your project on track
Compliance Monitoring
Compliance Monitoring

• Continuous process verifies that contract requirements are being met (accountability and program value)
  ➢ Fiscal/Administrative
  ➢ Workplan progress
  ➢ Safety (IRB, IACUC, SCRO, IBC)

• Communications
  ➢ Reports
  ➢ Policy, procedure and documentation reviews
  ➢ Technical assistance
  ➢ Training
  ➢ On-site visits
Find us on the web!

- New York State Stem Cell Science Program (NYSTEM)
  http://stemcell.ny.gov

- Breast Cancer Research and Education Program
  http://www.wadsworth.org/extramural/breastcancer/

- Spinal Cord Injury Research Program
  http://www.wadsworth.org/extramural/spinalcord/
Find us on the web!

http://www.wadsworth.org/extramural/index.htm
http://stemcell.ny.gov/
Awardee Information

For alternative versions of the documents below, please contact 518-474-7002 or nystem@health.ny.gov.

Awardee Requirements

Guides and Forms

The New York State Department of Health contracts for NYSTEM research awards require periodic progress, reporting and proper fiscal management and oversight. To assist contractors in meeting those contractual obligations, the Extramural Grants Administration unit provides the following forms and tools.

Research contracts require the timely reporting of scientific and fiscal information. The purpose of this reference manual is to assist investigators, fiscal staff, and research administration staff in managing the contract award.

Contractor Training Presentation (PDF file size: 8.2M)
http://www.wadsworth.org/extramural/breastcancer/index.htm
EGA e-Alerts

• Sign up to receive notification of new:
  ➢ Requests for Applications (RFAs & RFPs)
  ➢ Events (Board Meetings, Scientific Meetings, etc.)
  ➢ News (Recent Press Releases)
NYS Department of Health Extramural Grants Administration

Specific Questions?

Contact us at:
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SCIRB@health.ny.gov
or
(518) 474-7002