Financial Research Administration/Post Award

Controller's Office

Post Award Team

- Liz Ortiz-Interim Research Accounting Manager

- Denise Storm-Audit and Grants Compliance Manager

- Lloyd Thomas-Compliance Analyst

- David Bennett-Manager of Accounts Receivable and Billing

- David Gazzillo-Senior Research Accountant

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- Arkadiusz Czarniecki-Research Accountant

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- Sibyl Jayne-Research Accountant

- Pamela Lester-Research Accountant

- Emily Scagel-Research Accountant

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Agenda

- 1.)   Award Set Up/Account Establishment
- 2.)   Modifications to Existing Awards (as approved by OGCA)
- 3.)   Special Considerations During Award Processing
- 4.)   Research Administration / Shared Roles and Responsibilities
- 5.)   Re-budgeting
- 6.)   Financial Reporting
- 7.)   Subrecipient Invoicing/Monitoring
- 8.)   Invoicing, Cash Drawing/LOC, and Collection Activity
- 9.)   Closeout
- 10.)   Audit
- 11.)   Common Issues
- 12.)   Q&A

Award Set Up

- OGCA emails new awards to the Controller's Office. Awards are distributed to the appropriate Research Accountant (RA). RA's are assigned awards by Sponsor, this is to allow the RA to become familiar with regularly assigned sponsor requirements. Here is a listing of RA's and their assignments: http://www.umass.edu/controller/research-accounting

- The RA highlights and bookmarks important attributes in the award documents. The RA's bookmark items such as the IPF, terms and conditions, budget, billing, financial reporting, cost share, program income, participant support, etc. The highlights and bookmarks are available to departments in Summit.

- The award is processed in Kuali and uploaded overnight to PeopleSoft.

- A speed type is obtained and the award setup is completed in PeopleSoft.

- Award documents are uploaded into Kuali and made available for PI's and Business Managers to view in Summit. http://www.umass.edu/controller/sites/default/files/Finding_Award_docs_in_Summit.pdf

- A project information notification (PIN) report is sent to the PI and Business Manager by the RA clerk that the award is set up and spending can begin. The PIN highlights the assigned RA, chartstring, budget details, cost share, financial reports due, F&A rate and distribution, subaward budgets, project period, award number, and sponsor. Please always review the PIN report and contact the RA if you have any questions or concerns.

Modifications to Existing Awards (as approved by OGCA)

- All award actions such as establishment of a Subaward or modifications to existing awards (renewals/supplements, re-budgets, NCE, change of PI/other admin mod's, deobligations, terminations, award closeouts) are sent by OGCA to the Controller's Office.

- The assigned RA handles the modifications to their awards.

- The modification is processed in Kuali (if needed) and uploaded overnight to PeopleSoft

- Award documents are appended with the new files

- The RA clerk notifies the department via email of any award actions and modifications processed.

Special Considerations During Award Processing

- Cost Share-OGCA notifies the RA on the award face sheet when there is a cost share commitment. The RA will work with the department to establish a cost share speed type to help us track our cost share commitment. The cost share chartstring doesn't have a budget. The department uses the speed type which is established. The RA will run reports on the speed type and contact the department as necessary (when reporting is required/at closeout) to ensure cost sharing requirements are met. We rely on the department to monitor cost share by gathering, tracking, and maintaining all cost share records for auditing purposes. For third party cost share, the third party must provide documentation on their contribution. Cost share is auditable and reportable to the sponsors (if reporting is required).

- Program Income-The department contacts the RA assigned to the award to inform them that the award will be receiving income from an activity that is associated with the award. Then, a program income account 53626 is established by the RA. Program income is auditable and reported to the sponsor (if reporting is required). Program income must be used for the purposes of the award, adhere to the terms and conditions of the award, and it expires with the award. The income should be spent upon completion of the award, contact your RA if a balance remains.

- Participant Support-Direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. The RA will set up a separate project if needed for participant support to exclude the charging of F&A.

- Subawards-A Subaward is for the purpose of carrying out a portion of an award and creates an assistance relationship with a subrecipient. When an award is received with subaward(s) the RA confirms that the budget is set up to ensure that F&A is processed correctly, using over/under $25K budget accounts. When entering a requisition for subawards, certain transaction expense accounts must be used. 757270 must be used for any amount up to $25K (line 1) and 757270 is used for any amount over $25K (line 2) to ensure that F&A is processed correctly. Exceptions apply.

- International Programs-Departments should contact the RA as early as possible to discuss any unusual transactions such as paying individuals or companies in a foreign country, spending cash in a foreign country, issues associated with currency fluctuations, tax issues etc. For any financial issues associated with the management of an international award, contact your RA.

Research Administration = Shared Roles and Responsibilities

- PI-Ultimately responsible for all aspects of scientific and technical requirements of a sponsored project. They are responsible for ensuring compliance with financial and administrative aspects of the award. They determines allocability of expenditures working collaboratively with technical/administrative teams. Subrecipient monitoring. Submission of technical reports.

- Business Manager/Departmental Administrator-Determines allowability and reasonableness, compliance with UG, award terms and conditions and University policy. Documents expenditures including factors determining allowability. Reconciles sponsored awards to ensure expenses have been appropriately allocated, compare spending to budget and project encumbrances to manage award with the PI, performs departmental component of award closeout. We rely heavily on our BMGR's.

- Pre/Post-Award (OGCA)-Reviews proposal, including budget and supporting documentation to ensure submission complies with institutional and sponsor regulations. Ensures proper institutional approvals on proposal routing and submission. Negotiates agreements in accordance with institutional policies and procedures and sponsor regulations. Liaison between PI, department and sponsor (Contract officer).

- Post Award (Controller's Office)-Provide training, oversight and assistance of award management to ensure adherence to the allowability criteria, award terms and conditions, and institutional policies and procedures. Perform pre or post transaction monitoring based on risk assessment. RA's review certain expenses that are processed on the awards they manage. For instance, RA clerks/RA's review HR appointments, they review some recharges, all business expense reimbursements, some purchase requisitions for specific account codes including those requisitions that require sole source documentation (Fed awards), change orders on grant funds, all cost transfers, and all budget overrides/requisitions. RA's/RA clerks handle all cash advancements on sponsored grants.

Re-Budgeting-With No Prior Approval Required

- Departments can reach out to the RA for re-budgeting requests which do not require prior approval. Also, if departments are unsure of whether prior approval is needed they can contact their RA for guidance. If prior approval is <u>not</u> needed, your RA will handle the processing of the re-budget.

- If prior approval is required (change in scope, change in key personnel, change in cost sharing etc.) contact OGCA for a formal re-budget. If approved by the sponsor, a re-budget will be sent to the Controller's Office for processing.

- When submitting the request for re-budget be clear about the budget categories and amounts. Keep in mind that re-budgeting can impact F&A budget. A justification from the PI is required.

http://www.umass.edu/research/awards/administration/rebudgeting

Financial Reporting

- When an award is processed, the RA utilizes PeopleSoft milestones to help track when financial reports are due.

- All Financial reports must be verified by the Controller's Office before submission.

- Based on the award terms/reporting requirements, the RA enters the due date of financial reports and the type of report (Quarterly, Bi-Annual, Annual, Final).

- FFATA reporting-The Federal Funding Accountability and Transparency Act requires us to report (as the prime awardee) all Subaward data regarding first-tier subawards to meet FFATA reporting requirements. The Subaward information in FSRS will then be displayed on www.usaspending.gov associated with the prime award furthering federal spending transparency. This is auditable.

Subrecipient Invoicing and Monitoring

- Subrecipient invoices are sent to rainvoices@admin.umass.edu. An RA clerk reviews the invoice for required certification, subagreement no., current /cumulative amount invoiced. If the invoice has the required information, the clerk uploads the invoice and sends it out to the Business Manager, PI, and A/P. The invoice will require a PO number and E-Sign by all three parties. Invoices reminders are sent to facilitate the processing of invoices. Notes are made on the invoices to document delays in processing.

- The federal gov't requires payments to our subrecipients within 30 days unless the request is improper. Ensuring that our subrecipients bill us in a timely manner per the terms of the agreement, properly certify the invoice, and that our PI signs the invoice certifying that the expenses are appropriate and performance goals are being achieved is a critical part of our subrecipient monitoring process.

- In addition, the Controller's Office verifies that every subrecipient is audited as required by Uniform Guidance. For those who do not receive an audit, we document why an audit is not necessary. We issue management decisions for any audit findings pertaining to the federal award we provide to the subrecipient. Also, we are responsible for ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to our awards. As necessary, based on risk, we may request additional documentation or impose stricter terms.

Invoicing, Cash Drawing/LOC, and Collection Activity

- The Controller's Office handles all of the billing, drawing and collections required for your awards (unless there is an exception).

- We utilize PeopleSoft billing and A/R modules. The RA determines the billing requirements as outlined in the terms.

- The LOC billing type is used for some Federal awards, the money is drawn from each agency based on expenditures, no invoice is distributed.

- For all other billing types, an invoice is generated and sent to the sponsor when necessary. The billing process is run the week following the month close. The bills are processed in batch form and distributed to the RA's via electronic pdf's. These invoices are proforma/preliminary. The RA's review the invoices and decide whether to approve or delete. The approved invoices are sent to the sponsors and the deleted invoices will return to the system for the next batch process.

- An invoice can be paid either by check, CCJ, or wire. All payments are processed through the Research Receivables section. The payments are logged and matched to an invoice. They are deposited with the Bursar's office and once the payment has cleared, the payment is applied to the invoice at the award level.

- Once an invoice becomes 90 days past due, the invoice is followed up by the Receivables section for collection.

Closeout

- The RA clerks send an expiring award notice to the PI and Business Manager 60-90 days prior to the end date of the award.

- If your expecting another year of funding or if the award needs to be extended, let your RA know and work with OGCA.

- The email outlines the PI's and Business Managers responsibilities to ensure that the award is closed in a timely manner.

- Once the award expires, the RA confirms all expenses have been charged, any over expenditure has been cleared, all payments have been received, all financial reports have been submitted, and cost sharing requirements have been met.

- The speed type and project are inactivated. All documents are saved in a master file for 7yrs.

Financial Requests/Audits

- Often, sponsors require a financial questionnaire/certification to be completed by our University, this is done by the Controller's Office.

- The Controller is the Audit Liaison for the University. The office works to provide documentation and answer questions that auditors may have when we receive financial audits. We may need to request documentation from your department if we don't have it on file in the Controller's Office at the time of the audit request.

- We can be audited by internal auditors, external auditors, the government, and by our sponsors etc. We are audited on our systems, internal controls, and management of sponsored grants to the terms of the award.

- Each year we have a single audit (formerly A-133) as required by the Federal Gov't. This sets standards for audit consistency and uniformity among Federal agencies for the audit of non-profits. This audit tests us for 12 areas of review (compliance requirements) to ensure funds were used for activities that further the objectives outlined in the award documentation. There is a heavy focus on internal controls.

Common Issues

- Receiving re-budget requests that <u>do</u> need to be processed by OGCA, requests with missing justifications, or missing budget categories/amounts.

- Keep in mind that we do not process any award actions unless they come from OGCA (other than re-budgets which don't require sponsor approval). Contact us once you know an award action has been sent over to the Controller's Office.

- Cost transfers-NPCT need appropriate justification and backup. Payroll transfers should include justifications and need review of budget and dates prior to processing. Remember, we are post auditing payroll.

- We need IALS, Dept. ID's, Cost Share requirements, and RTF distribution before we can set up an award.

- If a payment is received for a sponsored grant, contact your RA. Otherwise, contact OGCA or General Accounting.

Q/A

Computerized post award accounting

Maybe the controllers office can share some best practices for electronic document creation and retention for grants? Do we still need to use accounting paper and a paper binder?   What documents need to be kept as paper and what can be electronic? What document retention methods do they recommend, knowing that people administering grants can change jobs?

-Summit vs PS reports - when to use one or the other. What is the difference? Is there an official one to use for grants?

Answer: Electronic Documents / Summit VS. People Soft Reports

- There is no specific policy for E-docs. They follow the same retention rules as paper

http://www.umass.edu/records/record-retention-and-disposition-schedules

- E-docs have the same legal standing as paper so paper doesn't need to be retained as long as E-docs are available.

- Both Summit and PS reports come from the same source, the official finance records of the University. Choose what you like best. Keep in mind that running reports in PS production is current. Summit is behind one day.