

Sponsored Programs Administration

Buzz Session
April 2024



Agenda

- SPA Update
- Recap of Buzz Sessions in '24
- SPA Overview
- SPA Regulatory Interactions
- Uniform Guidance Update
- Q&A



Recap of Buzz Sessions

- January – Looking Back on 2023 and Looking Ahead 2024 (NIH and SPA)
- February – Roles, Responsibilities, and Systems
- March – Contracting 101

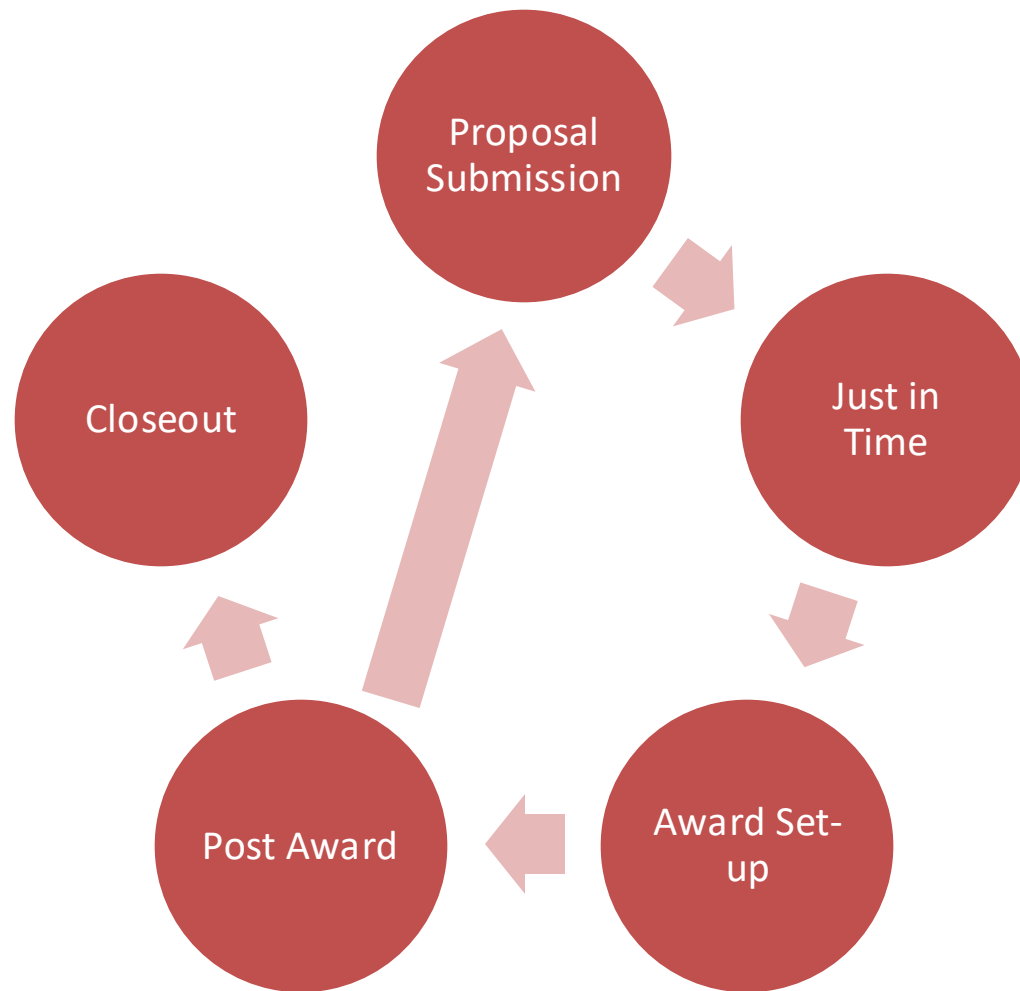


SPAdmin's Purpose

- To facilitate principal investigators' pursuit and management of external funding
- To protect UNMC as an organization subject to internal and external rules, regulations, and requirements



Life Cycle of a Sponsored Project



SPAdmin's Volume (FY23)

	Proposals			Awards		
	Research	Non-Research	Total	Research	Non-Research	Total
Federal	643	35	678	234	28	262
State	123	47	170	39	43	82
Industry	122	9	131	100	7	107
Other	473	59	532	259	52	311
Total	1,361	150	1,511	632	130	762



The Ticker (CY23)

Form	G Team	K Team	2023
Submissions	X	X	2,552
Award Setup	X		752
FDP Subs		X	521
Open Negotiations		X	713
Total			4,659*

* Includes 121 BHECN form tickets

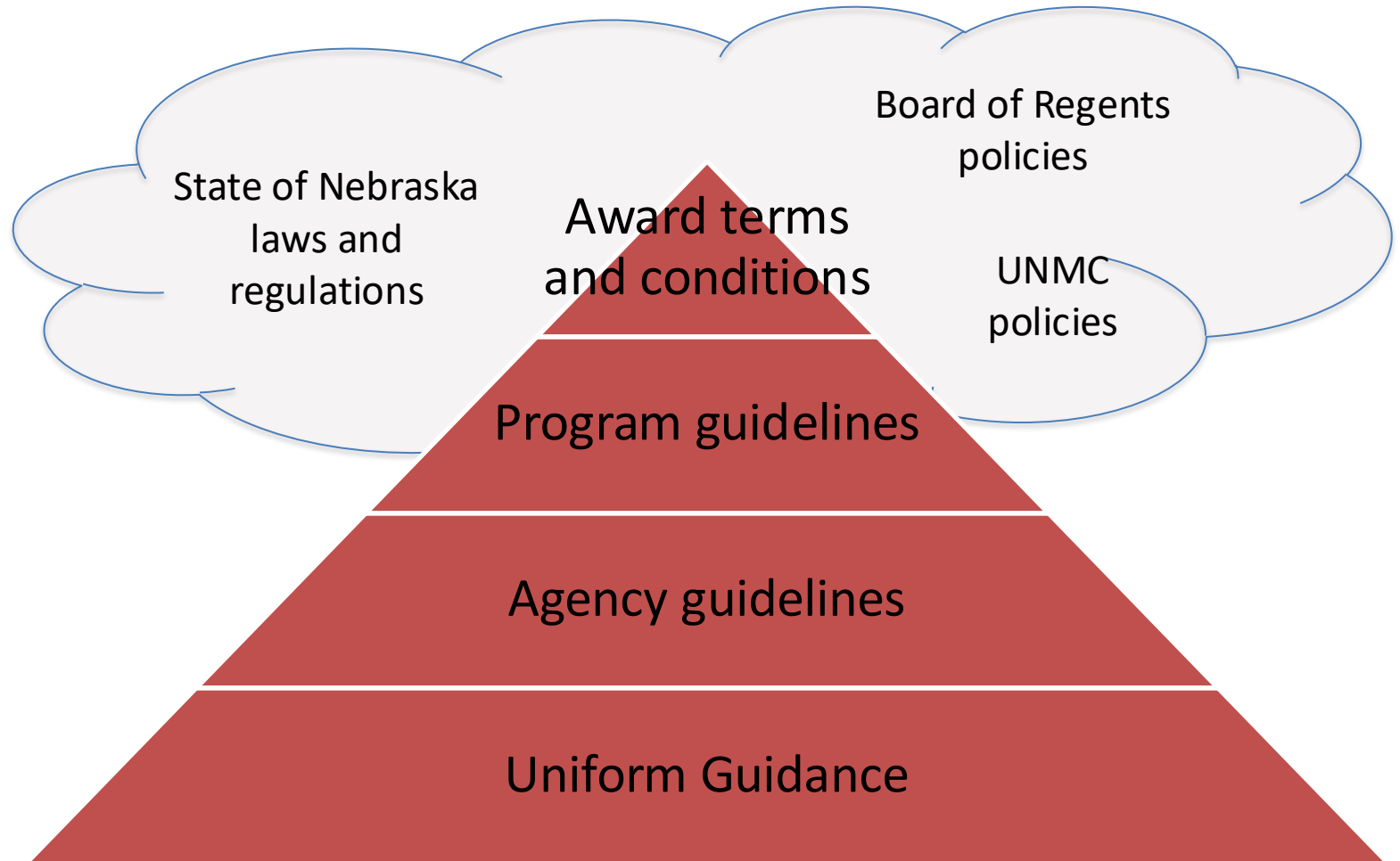


SPAdmin

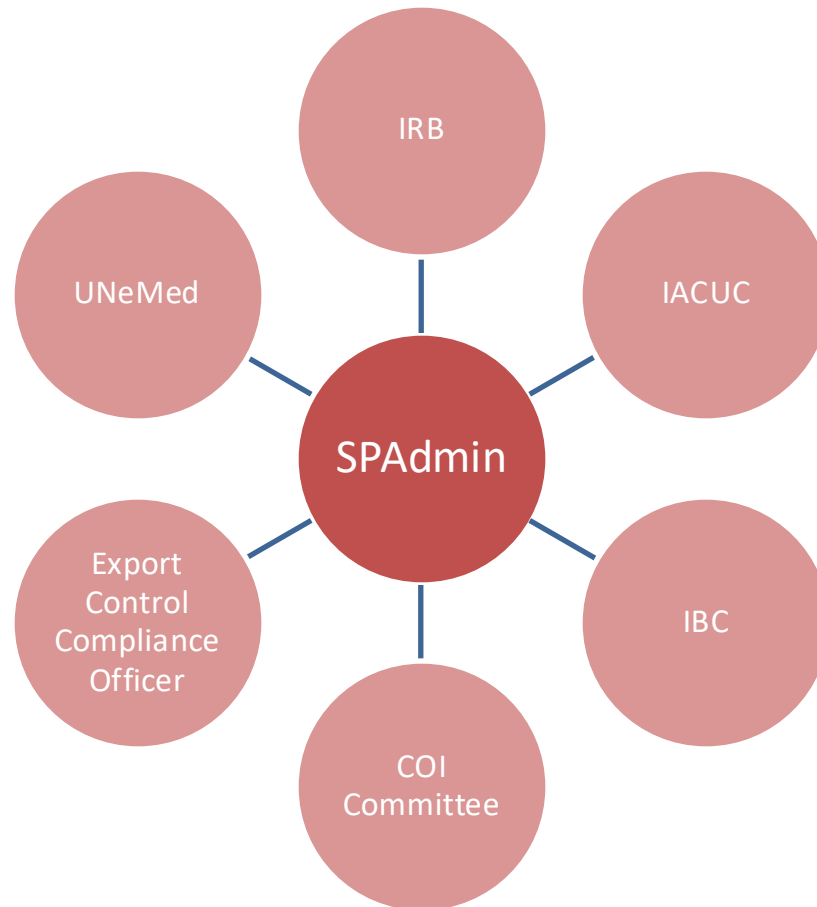
- Quality assurance – Ensure proposals:
 - Follow program guidelines
 - Include all required components
 - Contain accurate institutional information
- Authorization – Compliance checks
 - Sign and submit applications
 - Sign award documents
- “Non-financial post-award”
 - Process and submit progress reports
 - Generate subcontracts
 - Communicate with sponsors regarding changes to project and budget



Multiple regulations apply to sponsored projects



SPAdmin works closely with other campus wide compliance departments



Conflict of Interest

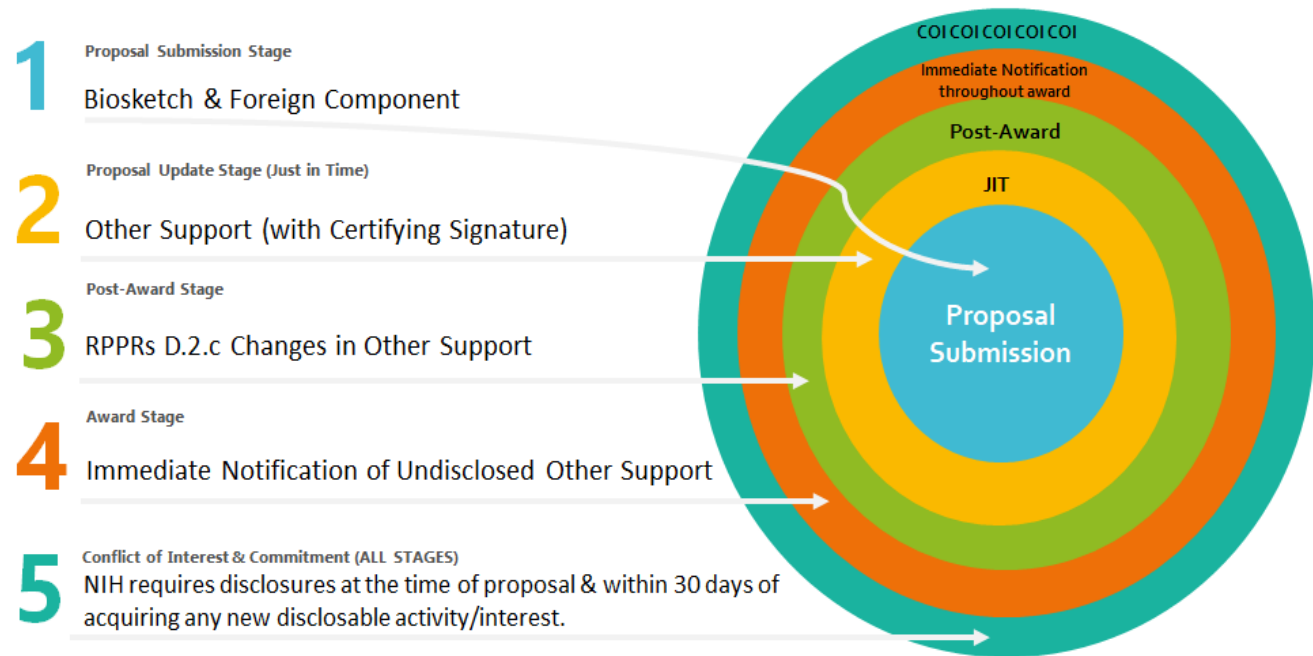
- Situations in which an individual's personal financial interests may compromise, or have the appearance of comprising, one's professional judgment or behavior in carrying out one's obligations to UNMC
- "Investigator" = Anyone, regardless of title or position, responsible for design, conduct, or reporting of research

Disclosure of financial interests	Annually, or if interests change	COI-SMART http://unmc.coi-smart.com/
Training in COI	Every four years, or if failure to comply	Canvas https://www.unmc.edu/canvas.html

COI: Biosketches and Other Support

Lifecycle of a Proposal/Award

When, What, and Where to Report.



Institutional Review Board

Human Subjects Decision Charts

<https://www.hhs.gov/ohrp/regulations-and-policy/decision-charts-2018/index.html>

- Are human subjects involved? (Y | N)
- Is the project considered human subjects research? (Y | N)
- If so, does an exemption apply? (Y | N)



Institutional Animal Care and Use Committee

- PI submits request to SPA to have an IACUC protocol compared to a grant/contract
- SPA provides copy of the grant and the IACUC protocol # to the Protocol Assessment Liaison (PAL) or designee to complete the congruency check
- If there are components of the grant/contract that do not match the approved IACUC protocol, PAL/designee will contact the PI to discuss inconsistencies and assist them in submitting the correct information to the IACUC or the funding agency
- Certification will be granted by PAL/designee when the components of the protocol and the grant/contract are in agreement, and SPA will link the grant/contract with the corresponding IACUC protocol for access to award funds



Export Control

https://wiki.unmc.edu/index.php/Export_Control

- Shipping equipment to a foreign country
- Exposing foreign nationals to research labs
- Sponsor approval rights over publication



Post Award



SPAccounting handles fiscal aspects of Post Award:

- Sets up awards in SAP
- Draws down funds and/or invoices sponsor
- Monitors accounts for allowable costs
- Prepares and submits financial reports



SPAdmin handles non-fiscal aspects of Post Award:

- Submit RPPR's (annual, final)
- Budget revisions
- Agency required prior approval requests
- No-cost extension requests
- Grant transfers



Uniform Guidance Updates



Uniform Guidance a Brief History

- Uniform Guidance, was released on December 26, 2013
- Effective December 26, 2014
- Consolidated what was then 8 separate Federal Circulars
- These 8 Circulars covered, admirative, cost, and audit principles / requirements of Non-Profits, State, Local, and Tribal Nations



History Continued

- While there has been updates to the requirements of 2 CFR 200.
- Generally, have been minor in nature.
- In some cases, only temporary such as the flexibilities to 2 CFR 200 during COVID-19 under OMB memos:
 - M-20-17
 - M-20-20
 - M-20-26



Recent Updates

- On 4/5/2024 OMB issued the most comprehensive update since inception.
- <https://www.cfo.gov/assets/files/Uniform%20Guidance%20Reference%20Guides%20FINAL%204-2024.pdf>
- Has impacts on both Pre and Post award activities



High Level Intention of Recent Changes by OMB

- Incorporate statutory requirements and administration priorities;
- Reduce agency and recipient burden;
- Clarify sections that recipients or agencies have interpreted in different ways; and
- Rewrite applicable sections in plain language to improve flow and address inconsistent use of terms within the guidance.



Summary of Changes

- Increasing Thresholds in Federal Financial Assistance
- Recognizing Recipient Costs of Doing Business
- Simplifying language and program requirements
- Eliminating Burdensome Requirements
- Clarifying Costs and Requirements



Increasing Thresholds in Federal Financial Assistance

- Equipment – Value increases from \$5,000 to \$10,000 (2 CFR 200.313(e)(1))
- Unused Supplies - Value increases from \$5,000 to \$10,000 (2 CFR 200.314)
- Single Audit – Raises the requirement of \$750K of Federal Awards to \$1M
- Fixed Amount Subawards – Raises from \$250K to \$500K (with prior approval from Agency) (2 CFR 200.333)



Recognizing Recipient Costs of Doing Business

- De Minimis Indirect Cost Rate – Raises from 10% to 15% without negotiating an alternative rate with the relevant Federal agency.
- Indirect Costs on Subawards – Raises the \$25,000 to \$50,000 as the amount of subawards that recipients can apply to their indirect rate towards.



Simplifying language and program requirements

- Revision makes clear that agencies should make their grant announcements as clear and concise as possible by limiting the length and complexity of the grant announcement by only including necessary information. (2 CFR 200.204)
- Revision allows agencies to translate a grant notices or other documents into another language (2 CFR 200.111)



Eliminating Burdensome Requirements

- Removing DS-2 Requirement - updates the cost accounting standards and disclosure statement to remove the requirement to submit a DS-2 disclosure statement in support of indirect rate (2 CFR 200.419)
- Reducing number of prior approvals - Revision removes certain prior approval requirements, including, for example: memberships, subscriptions, professional activity costs, and participant support costs.



Eliminating Burdensome Requirements (continued)

- Clarifying that second-tier subrecipients and contractors under grants do not need to obtain a UEI.
- Permit agencies to exempt foreign organizations and foreign public entities from completing a full SAM.gov registration for Federal awards under \$500,000.



Clarifying Costs and Requirements

- Closeout Costs - allows for certain administrative costs associated with closeout to be charged to the final budget period. (2 CFR 200.345)
- Organizational Costs - clarifies that certain costs associated with data and evaluation are allowable as direct costs (2 CFR 200.455)



Effective Date

- Changes don't go into effect until 10/01/24.
- Agencies will need to update their policies to reflect these changes.
- Get said changes reviewed by OMB for consistency of implementation.
- Stay tuned for clarifying documents / guidance as we get closer to implementation date.



Questions

<https://www.unmc.edu/spa/training/past-sessions.html>