OSRAA Outreach and Education Session
March 30, 2017

Current Hot Topics
and Updates

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PRA Update- Subaward Monitoring- High Risk Subawardees

OSU Action Item:

- High Risk Subawardees- OSRAA will be asking for additional information from small businesses, foreign entities, etc. who are listed as subawardees.
  - Federal Update- NIH directed to reduce administrative burden on subrecipients who are subject to the single audit in the 21st Century Cures Act.
  - OMB FAQs are anticipated so that NIH is consistent with rest of federal agencies.
  - OSU's focus is on subawardees who are not subject to the single audit (unlike other universities we deal with) so should not change our process.

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PRA Update- Uniform Guidance Agency Interpretations

- Executive Order Regulatory Freeze – Prevented OMB from publishing updates to the Uniform Guidance
  - NSF still moving forward with Federal-Wide Research Terms and Conditions (published 3/14/17)
  - Agency Implementation Requirements
    - DOE, NIH, and NSF are available.
    - We are still waiting on other agencies.
- Department of Education's Final Rule on Open Licensing requirements for Competitive Grant Programs was published prior to the regulatory freeze but backlash has resulted in a delay in implementation

FRA Update- OMB The Uniform Guidance Update

- Gil Tran – Senior Policy Analyst with the Executive Office of the President, Office of Management and Budget
- Very reassuring that the regulatory freeze is not unusual with administration transitions
- Federal Grants Activity over $620 Billion, does not see this dropping
- Expressed confidence that the grace period for procurement rules will be extended from 7/1/2017

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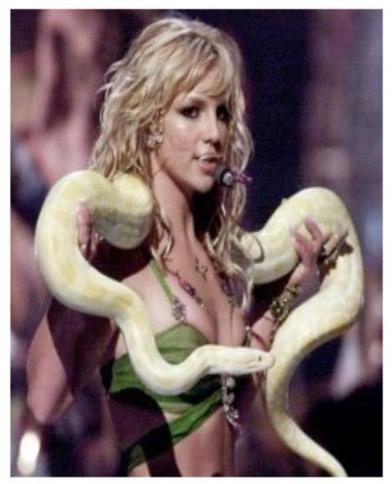
FRA Update- NSF Cash Management Update

- Due to NSF relocation, all NSF business systems (Research.Gov & FastLane) will be unavailable starting Friday, June 30 at 8PM EDT and are estimated to be shut down until Tuesday, July 4 at 6PM EDT

- ACM$ Payment Requests submitted after 12PM EDT on June 30 will not be processed for payment until the systems become available again

- NSF conducts a statistically random validation of grantees that make ACM$ payment requests to ensure compliance with cost principles – Advice: Be aware of what allowable costs are and check for improper transactions before payment is requested

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FRA Update- NSF Cash Management Update

- Canceling 2011 appropriations – NSF is doing outreach and education to ensure that recipients do not lose awards with funds expiring on 9/22/2017
  - Since the beginning of the year, they have been sending notices and ran a series of webinars to explain expiring funds
  - Fortunately, only two OSU awards were impacted and both have ended

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FRA Update- NSF Cash Management Update

- 2017 Proposal and Award Policies and Procedures Guide
  - Both pre- and post-award guidance in one manual
  - https://www.nsf.gov/pubs/policydocs/pappg17_1/index.jsp

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Hot Topics

Closeout Update

- Rolling out finalized guidance before the end of April
- New 90 day closeout memo to PI and BC
  - Advance notice of upcoming end date
  - Determine if NCE required
  - Ensure costs are appropriate and posted
  - Determine status of cost share and/or program income records
  - Identify and process future labor distributions
  - Confirm that PAR forms are filed and accurate

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Closeout Update

- Second closeout memo to be sent to PI and BC at award end
  - Call to action with deadline for posting expenses or advising CFM Team of exceptions or late posting items (such as subaward invoices and/or autopay items)
  - After stated deadline, balance will be considered final, and cost overrun will be processed if applicable
  - Ensure costs are appropriate, benefited the award, and are posted in Banner
  - Finalize cost share and/or program income records
  - Identify and process future labor distributions
  - Liquidate encumbrances, redirect autopay default indexes, initiate future payroll distributions and close all open HRIS jobs linked to award indexes
  - Confirm that PAR forms are filed and accurate

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Labor Distribution Docusign Pilot is Underway

- Docusign is being piloted for use on labor distribution forms
  - UABC
  - AMBC
  - BEBC
- BC to create Docusign envelope with approval routing per the OSRAA LD form and instructions
- OSRAA will either approve or reject LD with 480 character note
- If an LD is denied, it is routed back to the sender for revision and resubmission
- Revised LD will have to be rerouted through all of the approval queues, as the document cannot be altered once the sender releases if for approval

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Labor Distributions – Common Mistakes

- Missing required signatures
  - The routing will not change with Docusign
- Justification - not stating where effort was spent and why it belongs on the receiving index
  - Why is this change happening? Please don't make us guess!
  - Needs to state where the person's effort was expended
  - Not providing the reason salary was not transferred in a timely manner
  - Late cost transfers are a red flag audit item and require additional documentation
- Incorrect calculations
- Salary is unallowable on the award or outside the performance period

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Labor Distributions – Common Mistakes (contd)

- Missing or inadequate supporting documentation
  - Such as approvals from PAM Team, PI, sponsor, etc.
- OSRAA Website for Labor Distribution Policy, Guidelines, Instructions and FAQ's: http://research.oregonstate.edu/osraa/policies

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