

Research Administration Network Agenda

SUB Ballroom A

August 13, 2019

9:00am to 10:00am

- 1) Introduction of new staff (OSP)
- 2) Reminder on Deposits (Teresa)
- 3) Registration Open for Sept. Dept. Admin Training (Jeremy)
- 4) Research Administrators Symposium Reminder (Hannah)
- 5) Update on Subaward Workflow (Rebecca G.)
- 6) Misc. Proposal Updates (OSP)
- 7) Industrial Security – Overview of Industrial Security and Updates to the Undue Foreign Influence Briefing (Krista Laybourne)
- 8) COI – Reporting of Foreign Interests (Sue Marker)
- 9) IRB – Updates and announcements (Linda Petree)
- 10) Agency Spotlight – DOJ (Jeremy)

WORKSHOPS

Free IRB

IRB Regulations & Policies

Aug. 29th 2-3pm or Sept. 23th 10-11am

Ethics, regulations, and UNM policies that apply to your research.

IRB Elements

Sept. 5th 2-3pm or Sept. 30th 10-11am

Forms and documents that are needed for an IRB submission.

IRB Protocol & Consent

Sept. 12th 2-3pm or Oct. 7th 10-11am

How to write the perfect protocol and consent form.

Common Mistakes

Sept. 19th 2-3pm or Oct. 14th 10-11am

Learn the most common pitfalls that delay IRB approval.

IRBNet

Sept. 26th 2-3pm

Navigate the IRBNet submission website.



Reserve your spot today!

Workshops are held at the OIRB Office **1805 Sigma Chi Rd. NE**

Email us at IRBMainCampus@unm.edu

For more information on workshop times, days and topics check out our events at
irb.unm.edu



These workshops are eligible for PAW Passport credit

AGENCY SPOTLIGHT: DEPARTMENT OF JUSTICE (DOJ)



SPECIFICALLY: OFFICE OF JUSTICE (OJP) PROGRAMS

ABOUT OJP

- Office of Justice Programs (OJP) provides innovative leadership to federal, state, local, and tribal justice systems, by disseminating state-of-the art knowledge and practices across America, and providing grants for the implementation of these crime fighting strategies. Because most of the responsibility for crime control and prevention falls to law enforcement officers in states, cities, and neighborhoods, the federal government can be effective in these areas only to the extent that it can enter into partnerships with these officers. Therefore, OJP does not directly carry out law enforcement and justice activities. Instead, OJP works in partnership with the justice community to identify the most pressing crime-related challenges confronting the justice system and to provide information, training, coordination, and innovative strategies and approaches for addressing these challenges. OJP's goals are to strengthen partnerships with state, local and tribal stakeholders; ensure integrity of, and respect for, science - including a focus on evidence-based, "smart on crime" approaches in criminal and juvenile justice; and administer OJP's grant awards process in a fair, accessible and transparent fashion - and, as good stewards of federal funds, manage the grants system in a manner that avoids waste, fraud and abuse.

ELIGIBLE RECIPIENTS

- Eligibility requirements for block, formula, and discretionary awards can be found in the grant program solicitations contained in awarding agency program announcements, notices of funding opportunities (i.e., discretionary grant program solicitations), or other awarding agency program documents.
 - **Block and formula awards:** Generally, States, territories, and sometimes Indian tribes and units of local government are eligible for awards under the Department of Justice (DOJ's) various block and formula grant programs. Specific eligibility criteria for each program are set forth in the program's governing statute and rules.
 - **Discretionary awards:** DOJ may award funds under its discretionary grant programs to some or all of the following types of recipients, depending on authorizing legislation and selected program strategies: States, units of local government, Indian tribes and tribal organizations, institutions of higher education, hospitals, nonprofit organizations, for-profit organizations, and (in limited circumstances) individuals.

ACCEPTANCE OF AWARD AND AWARD CONDITIONS

- The Office of Justice Programs (OJP) send award notifications by email through the Grants Management System (GMS) to the individuals listed in the application as the point of contact and the authorizing official.
- The award document serves as the official document binding the recipient and DOJ to the grant agreement. A sample award document is included on the next slide. It includes the name of the recipient, project title, award period, budget period, type of Federal funds (grants and cooperative agreements), amount of Federal funds, award number, and special conditions that must be met during the award period.



1. RECIPIENT NAME AND ADDRESS (Including Zip Code)

[REDACTED]

4. AWARD NUMBER: [REDACTED]

5. PROJECT PERIOD: FROM 10/01/2016 TO 09/30/2019

BUDGET PERIOD: FROM 10/01/2016 TO 09/30/2019

6. AWARD DATE 09/19/2016

7. ACTION

8. SUPPLEMENT NUMBER

Initial

00

2a. GRANTEE IRS/VENDOR NO.

[REDACTED]

2b. GRANTEE DUNS NO.

[REDACTED]

9. PREVIOUS AWARD AMOUNT

\$ 0

3. PROJECT TITLE

[REDACTED]

10. AMOUNT OF THIS AWARD

\$ 44,634

11. TOTAL AWARD

\$ 44,634

12. SPECIAL CONDITIONS

THE ABOVE GRANT PROJECT IS APPROVED SUBJECT TO SUCH CONDITIONS OR LIMITATIONS AS ARE SET FORTH ON THE ATTACHED PAGE(S).

13. STATUTORY AUTHORITY FOR GRANT

This project is supported under [REDACTED]

14. CATALOG OF DOMESTIC FEDERAL ASSISTANCE (CFDA Number)

16.734 [REDACTED]

15. METHOD OF PAYMENT

GPRS

AGENCY APPROVAL

GRANTEE ACCEPTANCE

16. TYPED NAME AND TITLE OF APPROVING OFFICIAL

[REDACTED]

18. TYPED NAME AND TITLE OF AUTHORIZED GRANTEE OFFICIAL

[REDACTED]

17. SIGNATURE OF APPROVING OFFICIAL

19. SIGNATURE OF AUTHORIZED RECIPIENT OFFICIAL

19A. DATE

AGENCY USE ONLY

20. ACCOUNTING CLASSIFICATION CODES

FISCAL YEAR FUND CODE BUD. ACT. DIV. OFC. REG. SUB. POMS AMOUNT

[REDACTED]

21. [REDACTED]

SPECIAL CONDITIONS

- Special conditions are terms and conditions that are included with the award. Special conditions may include additional requirements covering areas such as programmatic and financial reporting, prohibited uses of Federal funds, consultant rates, changes in key personnel, and proper disposition of program income.
- Some special conditions may be based on the program or the nature of the award itself. Regardless of the program office or the award, **there are several mandatory special conditions that will be included on any DOJ award**. A list of all the mandatory special conditions for each DOJ grant-making component is available at the following links:
 - OJP - <http://ojp.gov/funding/Explore/SolicitationRequirements/MandatoryTermsConditions.htm>

ADJUSTMENTS TO AWARDS

Grant Adjustment Notice

A Grant Adjustment Notice (GAN) is a request to make a programmatic, administrative, or financial change to a grant. GANs may be submitted by the recipient, grant manager, or automatically generated by the Grant Management System (GMS). All GANs must be submitted electronically through the GAN module in GMS.

- Once OJP has made a decision on the proposed adjustment, the grantee is sent notification via a GAN or MOD that becomes a permanent part of their award file, and the record is updated as appropriate.
- Recipients are limited to specific grant award adjustment(s).

FINANCIAL POINT OF CONTACT (FPOC)

- To accept an award from OJP or OVW, log into GMS and designate a Financial Point of Contact (FPOC).
- Here are some important points about the FPOC:
 - The FPOC must be the individual(s) the recipient has designated as responsible for the financial administration of the award.
 - For UNM, this is your fiscal monitor/billing accountant in CGA
 - He or she may be the same as the Point of Contact (POC). Alternatively, the FPOC may be one or more separate individuals designated by the recipient.
 - The designation of the FPOC must be completed in GMS before the award acceptance documents can be printed.

PAYMENTS

- The Grant Payment Request System (GPRS) is the system for requesting payment of award funds. It is an online system that allows viewing of active award balances and history of drawdowns to date.
- The FPOC will submit all payment requests through GPRS.

REPORTING REQUIREMENTS

- The Department of Justice (DOJ) requires award recipients to submit both financial and program reports.
- The SF-425 must be submitted online through the Grants Management System (GMS) Financial Status Reports Module. This module will allow authorized users to view current and past SF-425s and file or amend the SF-425 for the current quarter.
 - To be completed and submitted by your CGA fiscal monitor
- Progress reports are submitted by recipients annually or semi-annually, depending on the award type.

SPECIAL REQUIREMENTS SPECIFIC TO OJP

- **Sole Source Approval For OJP**
- **Prior Approval of Certain Costs**
- **Equipment and Other Capital Expenditures**
- **Pre-Award Costs**
- **Consultant Rates**
- **Conference Costs**
- **Foreign Travel**
- **Moving Money between Categories**

SOLE SOURCE APPROVAL FOR OJP

- A Grant Adjustment Notice (GAN) must be initiated to request to enter into a non-competitive contractual relationship with a contractor under a grant where the contracted cost exceeds the simplified acquisition threshold.

COSTS REQUIRING PRIOR APPROVAL

- Written prior approval must be obtained for some costs, as specified in 2 CFR Part 200 (specifically in 2 CFR § 200.407). The following are some examples of costs that require a GAN for prior approval from DOJ:
 - Compensation for consultant services in excess of the grant-making component's maximum hourly or daily rate for an 8-hour day - currently \$650.
 - Publication plans
 - Costs incurred prior to the date of the subaward period
 - Foreign travel

EQUIPMENT AND OTHER CAPITAL EXPENDITURES

- If recipients or subrecipients have received prior approval for expenditures for equipment and other capital assets, including repairs which materially increase the useful life of equipment, then these expenditures are allowable. See 2 C.F.R. § 200.439.
- Expenditures for equipment must be fully justified in the budget and budget narrative; otherwise the grantmaking component may require that the type, quantity estimated, unit, or other information be provided before the final budget can be issued.
- In reviewing equipment acquisition budgets and proposals, the following principles should be followed:
 - No other equipment owned by the recipient/subrecipient is suitable for the project;
 - No luxury vehicles will be approved;
 - If the vehicle request is approved, the vehicle should be reasonable, and the recipients must follow the Internal Revenue Service guidelines;
 - If the vehicle(s) was purchased as part of a unit of government fleet by the State or local central procurement activities, it is generally accepted as reasonable;
 - Federal funds are not used to provide reimbursement for the purchase of equipment already owned by the recipient/subrecipient; and
 - Equipment purchased and used commonly for two or more programs should be appropriately divided among each activity.
- Equipment that has already been purchased and charged to other activities of the organization is not an allowable expense to the award.

PRE-AWARD COSTS

- Pre-award costs are costs incurred prior to the project begin date and in anticipation of the award where such costs are necessary for efficient and timely performance of the scope of the work. Costs are allowed only to the extent that they would be allowed if incurred after the start date of the Federal award **and** only with prior approval of the DOJ awarding agency.
- Prior approval is required for pre-award costs. Costs incurred prior to the start date of the award may be charged to the project only if the award recipient received written prior approval from the grant-making component. Direct recipients may approve pre-award costs for subrecipients if incurred after the start date of the Federal award.
- Any and all costs in furtherance of a project which costs occur prior to an award date are at the sole risk of an applicant, and can only be reimbursed to the extent that there is prior approval.

CONSULTANT RATES

- Compensation for individual consultant services is to be reasonable and consistent with that paid for similar services in the marketplace.
- Each grant-making component periodically establishes a prior approval threshold consultant rate. **The current rate for each grant-making component is \$650 per day or \$81.25 per hour.** This limit is specified in the terms and special conditions of the award.
- When the rate exceeds the limit for an 8-hour day, or a proportionate hourly rate (excluding travel and subsistence costs), a written prior approval is required from the grant-making component. Prior approval requests require additional justification.
- An 8-hour day may include preparation, evaluation, and travel time in addition to the time required for actual performance. (Please note, however, that this does not mean that the rate can or should be the maximum limit for all consultants.)
- Rates above the established maximum threshold rate will be reviewed on a case-by-case basis. Justification for exceeding the established maximum rate may include where a rate is established through a competitive bidding process.
- In order to calculate a rate of compensation for consultants associated with and employed by institutions of higher learning, divide the total compensation projected for 12 months by 260.
- If the resulting rate of compensation exceeds the maximum consultant rate established by the grant-making component, written prior approval must be obtained.

CONFERENCE COSTS

- All conferences (defined broadly to include meetings, retreats, seminars, symposiums, events, and group training activity) conducted by Cooperative Agreement recipients or contractors funded by DOJ must receive written prior approval. **An approved award budget is not a prior approval.** All prior approval requests must be submitted within the required number of days (90 or 120) in advance of the start date.
 - See Chapter 3.10: Conference Approval, Planning, and Reporting for more information.

FOREIGN TRAVEL

- Foreign travel is defined as any travel outside of the United States and its Territories and possessions. However, for organizations located in foreign countries, foreign travel means travel outside of the organization's country. Some requirements for foreign travel:
 - Each separate foreign trip **must be pre-approved**.
 - Direct charges for foreign travel costs are **not allowable unless the travel has prior approval from the awarding agency**.
 - Indirect charges for foreign travel are allowable without prior approval from the awarding agency when they are included as part of a federally approved indirect cost rate and have a beneficial relationship to the project.

MOVING MONEY BETWEEN CATEGORIES

- Moving monies into any budget category with a zero dollar amount is not allowable without prior approval from the grant-making component. A budget modification is required. See 2 C.F.R. § 200.308(e).

TOP AUDIT FINDINGS (FY 2016)

Top Audit Findings (Fiscal Year 2016)	
1	Procedures not documented or need improvement.
2	Special conditions not met by grantee.
3	Federal Financial Reports (FFR) not accurately prepared.
4	Debarment and Suspension - verification not performed or not properly documented.
5	Federal Financial Reports (FFR) not submitted timely.
6	Accounting system inadequate or not effectively utilized to account for grant funds.
7	Excess cash-on-hand.
8	Subrecipient monitoring not being conducted.
9	Federal Financial Reports (FFR) amounts did not reconcile to grantee's accounting system.
10	Progress reports not timely submitted.



DOJ/OJP RESOURCES

- **Read your Notice of Award in detail for any special conditions!**
- Refer to the DOJ Grants Financial Guide for more information
 - <https://ojp.gov/financialguide/doj/index.htm>
- Contact your fiscal monitor if you have any award-specific questions on cost allowability or pre-approvals

ANY QUESTIONS?

