


NCURA Region IV
Spring Meeting April 25-28, 2010 Omaha, Nebraska

Compliance from a Departmental Perspective

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Objectives


- To become familiar with the range of compliance issues within the Departmental Research Administration arena;
- To increase awareness of the complexities involved with compliance in this area;
- To identify potential compliance issues and ways to resolve them in an effort to stay compliant.



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Award Monitoring


- Review of expenditures in a timely fashion
- Cost Transfers
- Allowable, allocable and reasonable
- Cost Share Commitments
- Overspending/Underspending
- Increasing/Decreasing Effort of Key Personnel
- Equipment Purchases
- Training, training, training!



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Subrecipient Monitoring

- Overseeing all work with subrecipient
- Regular follow-up meetings with PI and sub PI to review project timeline
- Terms of the subaward including termination for non-performance and audit
- Allowable and allocable to the subcontract
- Payment/invoicing terms of the subcontract
- Carryforward
- Foreign subrecipients & negotiated F&A rates




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Administrative Costs

- Defining administrative costs
- Major projects
- Equipment and computers
- Up-to-date job descriptions




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Time & Effort Reporting

- Systems in use for verifying effort
- Direct working knowledge of the work being done on the research projects
- Certification should be done in a timely manner
- Changes must reflect the actual work being done




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Allocation of Payments & Budgetary Controls

- Salaries
- Percentage of expenses charged
- Shifting expenses




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Travel, Procurement & Procurement Cards

- Policies and procedures
- Procurement card expenses
- Documentation
- Personnel Services Contract vs. Subcontract; Vendor vs. Subaward
- Per diem rate information




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Lab Animal Services

- Animal protocol
- Award notice
- Specific policies and procedures
- Billing for services




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Information Technology (IT) Controls

- Institutional policies and procedures
- Sufficient training
- Key point of contact
- Servers and access




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Internal Controls & Audit

- Approval of expenditures
- Policies and procedures, and systems
- Checks and balances
- Training




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Written Policies & Procedures

- Institution's policies and procedures
- OMB Circulars
- FAR Clauses
- Subject-matter experts
- Written policies are not available
- Consistent application




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Research Misconduct & Standards of Conduct

- Standards of conduct at your institution
- Documentation
- Procedures for reporting suspected instances of misconduct




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Records Management

- Retaining and disposing of records
- Alignment to federal policies
- Shredding vs. recycling




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Property Management

- Updated equipment listing
- Equipment transfers
- Splitting costs for equipment between multiple projects




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Indirect Costs

- Definition of F&A
- Full F&A, Modified Total Direct Cost (MTDC), and reduced F&A
- On-campus vs. off-campus F&A rates




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Summary

Compliance comes in all shapes and sizes and includes both financial and non-financial items.


Become proficient with your institution's policies and procedures - get to know them well.


Become proficient with the OMB circulars (A-21, A-110, A-122, A-133), the FAR Clauses, and any other publications that can be applied to your sponsored research.



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Questions?





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