

# RESEARCH ADMINISTRATION

# UPDATE

Wednesday, April 26, 2017  
Lazare Auditorium, (S1-607) 1:00 - 3:00 pm

The second half of the update will be  
dedicated to the training topic:

Departmental Subrecipient Monitoring

**UMASS**  
Medical School



# Agenda

- NIH Update
  - NOT-OD-17-057: Guidance for Adjustments to Appointment Records in xTrain to Reflect Stipend Level Increases for Postdoctoral Trainees on Institutional Ruth L. Kirschstein National Research Service Awards (NRSA)
  - Submitting Final RPPRs
  - Center for Scientific Review (CSR) Rejecting Applications Seeking to Circumvent Page Limits
  - Center for Scientific Review (CSR) Rejecting Applications for Non-Compliant Appendix Materials
  - Center for Scientific Review (CSR) Warning Letter for Non-Compliant Biosketch
- Other Updates
  - Piloting Electronic Signatures on Annual Progress Report and Proposal Routing Forms with Medicine
  - Updating Proposal Submission Dates Using SUMMIT Pre-Award Dashboard
- Proposal & Progress Report Statistics
- Research Administration Training Topic:
  - Departmental Subrecipient Monitoring Tools
  - Jackie Lima, Biochemistry & Molecular Pharmacology and
  - Diego Vazquez, Office of Sponsored Programs

- This Notice provides additional guidance regarding the process recipients of Kirschstein-NRSA institutional training grants (T32, T35, T90, TL1) will need to follow in order to properly reflect adjustments to appointment records for trainees when the training grant received supplemental funding in response to NOT-OD-17-002.
- This notice also alerts training grant awardees meeting the criteria established in NOT-OD-17-002 that they must submit applications by June 30th, 2017, in order to receive supplemental funding from NIH to accommodate stipend level increase.
- The full notice is included in the Appendix of this presentation.

# Submitting Final RPPRs

- As of 1/1/17, a Final RPPR is required for any grant that has ended and any grant that is not to be extended through award of a new competitive segment. The report is due within 120 days of the end of the project period. This report should be prepared in accordance with instructions provided by the awarding component.
- Effective 2/9/17, if the recipient organization has submitted a renewal application on or before the date by which a Final Research Performance Progress Report (Final-RPPR) would be required for the current competitive segment, then submission of an Interim RPPR via eRA Commons is now required. The I-RPPR will be used for the submission of a Competing Renewal application (Type 2).
- Both the Interim RPPR and the Final RPPR are currently identical in process and information required. The difference between the two is when and where they are made available to initiate and submit. The Interim RPPR link will be made available to the Signing Official (SO) in the Status screen when a grant is eligible for submission of a Competing Renewal application.
- The Final RPPR is only available as part of the Closeout process and the Process Final RPPR link only appears on the Closeout Status screen.
- The format of the Interim RPPR and the Final RPPR will be the same as the current annual RPPR, making it easier for recipients to navigate through both the Interim and the Final RPPR, based on familiarity with the existing format of the annual RPPR.
- Differences between Interim/Final RPPR and the annual RPPR are few:
  - In the Interim/Final RPPR, only Section D.1 is required in the Participants section
  - Sections F: Changes and Section H: Budget are not part of the Interim/Final RPPR
  - Section I: Outcomes is new. Section I is required for both the Interim/Final RPPR
- eRA Commons FRPPR Help:  
[https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final\\_RPPR.htm](https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final_RPPR.htm)



# OSP F-RPPR Guidance to PIs

- E-mailed to Investigators:
- I am following up on the notice below from the NIH regarding the closeout of your XXXXXXXX grant. Your closeout documents are due no later than XXXXXXXX.
- The Final Research Performance Progress Report (FRPPR) is submitted through the Commons in a format similar to the annual Research Performance Progress Report (RPPR).
- Further guidance and screenshots can be found here:  
[https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final\\_RPPR.htm](https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final_RPPR.htm)
- Please note that Section D.1 Participants is REQUIRED for the FRPPR. Your administrator, cc'ed on this email, should be able to assist in providing you the information and assistance needed to complete this section.
- Unlike the Annual Progress Report (RPPR), a FRPPR cannot be accessed by a delegate or routed to a delegate for assistance. It must be completed under your Commons Account.
- Once the FRPPR is completed and no errors are found on validation it can be submitted directly to the NIH. It does not require routing to our office for review.

# Center for Scientific Review (CSR) Rejecting Applications Seeking to Circumvent Page Limits

Information that  
should have been in  
the Research  
Strategy Section was  
placed in the  
Authentication of  
Key Biological  
and/or Chemical  
Resources section



DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review  
6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

April 10, 2017

[REDACTED]  
University of Massachusetts Medical School  
[REDACTED]

Dear Dr. [REDACTED]

Your application entitled [REDACTED] has been analyzed by the Division of Receipt and Referral at the Center for Scientific Review at the NIH. Your application has been found to contain information that should be within the page limits of the Research Strategy inappropriately placed in other sections of the application. Specifically, this information was found in Authentication of Key Biological and/or Chemical Resources section. Therefore, the application cannot proceed in the referral and review process.

Beginning with applications targeting due dates on or after January 25, 2010, NIH converted to a restructured application package and shorter page limits for most activity codes. These page limits must be adhered to and it is not permissible to add material to inappropriate sections (e.g. appendix, vertebrate animals etc) to circumvent the specified page limits. See:

- NOT-OD-07-018 -- New Limits on Appendix Materials (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-07-018>) to be replaced with
- NOT-OD-16-129 -- New Policy Eliminates Most Appendix Material for NIH/AHRQ/NIOSH Applications Submitted for Due Dates On or After January 25, 2017 (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-129.html>)
- NOT-OD-11-080 -- Reminder: Compliance with NIH Application Format and Content Instructions (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-11-080.html>)
- NOT-OD-15-095 Reminder: NIH Policy on Application Compliance (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-095.html>)

We regret that we must withdraw your application at this time. The next due date is June 5, 2017. If you have any questions concerning this action, please contact me or anyone else in this office.

[REDACTED]  
[REDACTED]

# Center for Scientific Review (CSR) Rejecting Applications for Non-Compliant Appendix Materials

Appendix Information included over 20 pages of data term explanations.

Unallowable materials resulted in application being withdrawn.



DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review  
6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

April 14, 2017

[REDACTED]  
University of Massachusetts Medical School  
[REDACTED]  
Worcester, MA 01655-0002

Dear Dr. [REDACTED]

Your application [REDACTED] has been identified as having Appendix content that is not compliant with NIH/AHRQ/CDC policy NOT-OD-16-129 (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-129.html>). Very limited items are allowed in appendices. In the case of your application, you have included over 20 pages of data term explanations in 2 tables. Because this unallowable material is in the Appendix, your application is being withdrawn.

For more information about this policy, see:

- NOT-OD-17-035: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-17-035.html>
- FAQs: [https://grants.nih.gov/grants/policy/appendix\\_policy.htm](https://grants.nih.gov/grants/policy/appendix_policy.htm)

The next due date for your application is June 5, 2017. Please consider submitting a compliant application at that time.

If you have any questions, please do not hesitate to contact me or anyone else in this office.

Sincerely,

[REDACTED]  
Division of Receipt and Referral  
Center for Scientific Review  
[REDACTED]  
[REDACTED]

# Center for Scientific Review (CSR) Warning Letter for Non-Compliant Biosketch

Information that  
should have been in  
the Research  
Strategy Section was  
placed in the  
Authentication of  
Key Biological  
and/or Chemical  
Resources section



DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review  
6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

[REDACTED]  
University of Massachusetts Medical School  
55 Lake Avenue North  
Worcester, MA 01655-0002

Dear Dr. [REDACTED]:

**THIS NOTE SERVES AS A WARNING AND NO ACTION IS REQUIRED AT THIS TIME.**

During the review of your application entitled [REDACTED], NIH staff and/or reviewers noted that one or more of the biosketches included in the application did not comply with the new biosketch format requirements (NOT-OD-15-032; <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html>). Applications with biosketches that do not follow the current guidelines for format and content are non-compliant. You should be mindful that non-compliance can have serious consequences. NIH may withdraw any application identified during the receipt, referral and review process that is not compliant with the instructions in the SF424 (R&R) Application Guide, the Funding Opportunity Announcement, and relevant NIH Guide Notices (see <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-095.html>). Instructions for preparing a compliant biosketch can be found at <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html>.

**Your current application will not be withdrawn.** There is no need to correct your biosketch(s) at this time. Indeed, as stated in NOT-OD-13-030, <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-13-030.html>, you cannot submit updated biosketches after the submission of the grant application.

**If you have any questions regarding this correspondence, please contact the Scientific Review Officer who managed review of your application; that information can be found in eRA Commons or at the end of the meeting roster on your summary statement.** Also, please feel free to contact anyone in this office, at the e-mail address provided below, if you need more clarification about implementation of this policy.

The Division of Receipt and Referral  
[csdrr@mail.nih.gov](mailto:csdrr@mail.nih.gov)



- OSP accepting electronic signatures on APR and PRF forms
  - Original signatures not required with the review packet
  - OSP will accept scanned, faxed, electronically signed or pdf'd versions of the forms.
- OSP still requires hard copy packet for review.
- Will report back at the next RAU on the pilot and when/if the practice will be opened up to the UMMS community.

# Updating Proposal Submission Dates Using SUMMIT Pre-Award Dashboard

- School leadership reviews proposal submission and success rate metrics using SUMMIT pre-award dashboard data.
  - For non-Cayuse proposals previously submitted that appear as “In Process” without a Date Submitted, use the *RFS Submitted Proposal Form* link to update the status.
  - **Please note that this is not an electronic process. The form must be completed and submitted to OSP for updating.**
  - There are currently a significant amount of proposals out there with submit dates that have yet to be submitted to OSP for updating.
- A job aid is available on Financial Services website at:
  - [http://inside.umassmed.edu/uploadedFiles/Pre%20Award%20Dashboard\\_040314.docx](http://inside.umassmed.edu/uploadedFiles/Pre%20Award%20Dashboard_040314.docx)

# PROPOSAL SUBMISSIONS TO OSP

March 2016 – March 2017

	March 2016	April 2016	May 2016	June 2016	July 2016	August 2016	September 2016	October 2016	November 2016	December 2016	January 2017	February 2017	March 2017
<b>Count</b>	89	72	101	106	78	86	121	106	71	48	103	108	90
<b>On Time</b>	45%	29%	57%	40%	44%	44%	56%	46%	35%	46%	53%	52%	55%
<b>Late</b>	55%	70%	39%	59%	56%	50%	40%	49%	62%	46%	41%	43%	44%
<b>After the fact</b>	0%	1%	4%	1%	0%	6%	4%	5%	3%	8%	5%	5%	1%
<b>Withdrawn</b>	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%
<b>Total</b>	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
<b>Expedited Request (3 days or less)</b>	42%	44%	21%	36%	42%	35%	28%	32%	35%	33%	22%	28%	33%

**On Time:** Received by OSP 5 business days prior to the requested return date.

**Late:** Received by OSP less than 5 business days prior to the requested return date.

**After the Fact:** Received by OSP after the requested return date.

**Expedited Request:** Received by OSP with 3 business days or less to review before requested return date.

# SUBMISSIONS TO OSP

## March 2016 to March 2017 Comparison

PROPOSALS	2016	2017	Change
Count	89	90	+1
On Time	45%	55%	+10
Late	55%	44%	-9
After the fact	0%	1%	+1
Withdrawn	0%	0%	-
Total	100%	100%	-
Expedited Request (3 days or less)	42%	33%	-9

On Time: Received by OSP 5 business days prior to the requested return date.

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After the Fact: Received by OSP after the requested return date.

Expedited Request: Received by OSP with 3 business days or less to review before requested return date.



# PROGRESS REPORT SUBMISSIONS TO OSP

## March 2016 – March 2017

	March 2016	April 2016	May 2016	June 2016	July 2016	August 2016	September 2016	October 2016	November 2016	December 2016	January 2017	February 2017	March 2017
<b>Count</b>	71	58	43	50	25	17	27	34	32	35	43	38	59
<b>On Time</b>	58%	64%	49%	52%	60%	41%	67%	62%	59%	63%	68%	58%	54%
<b>Late</b>	39%	36%	51%	42%	28%	41%	22%	35%	38%	37%	30%	39%	42%
<b>After the fact</b>	3%	0%	0%	6%	12%	18%	11%	3%	3%	0%	2%	3%	4%
<b>Total</b>	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
<b>Expedited Request (3 days or less)</b>	27%	26%	37%	36%	16%	35%	19%	29%	19%	23%	21%	32%	25%

**On Time:** Received by OSP 5 business days prior to the requested return date.

**Late:** Received by OSP less than 5 business days prior to the requested return date.

**After the Fact:** Received by OSP after the requested return date.

**Expedited Request:** Received by OSP with 3 business days or less to review before requested return date.

# SUBMISSIONS TO OSP

## March 2016 to March 2017 Comparison

PROGRESS REPORTS	2016	2017	Change
Count	71	59	-12
On Time	58%	55%	-3
Late	39%	42%	+3
After the fact	3%	4%	+1
Withdrawn	0%	0%	-
Total	100%	100%	-
Expedited Request (3 days or less)	27%	33%	+6

On Time: Received by OSP 5 business days prior to the requested return date.

Late: Received by OSP less than 5 business days prior to the requested return date.

After the Fact: Received by OSP after the requested return date.

Expedited Request: Received by OSP with 3 business days or less to review before requested return date.

# Departmental Subrecipient Monitoring

Research Administration Update Training

April 26, 2017

Jackie Lima, Biochemistry & Molecular Pharmacology  
Diego Vazquez, Office of Sponsored Programs

# Subrecipient Definitions from the Uniform Guidance (2 CFR 200)

- 200.74, **Pass-through entity**: non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.
- 200.93, **Subrecipient**: a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program.
- 200.23, **Contractor** (replaces term “vendor” used in A-133: means an entity that receives a contract.



# Types of Grant Agreements

- 200.201, Pass-through entity must decide on the appropriate instrument for the Federal Award:
  - Grant agreement
  - Cooperative agreement
  - Contract

- A Pass-through entity must make a case-by-case determination as to whether each agreement casts the party as a subrecipient or contractor. Look at the nature of the relationship. It does not matter what the agreement is called.

<u>Subaward</u>	<u>Contract</u>
<ul style="list-style-type: none"><li>■ Allowable activities based on applicable statute, local plan, State rules</li><li>■ Management rules<ul style="list-style-type: none"><li>■ Applicable OMB Circular; and</li><li>■ Sponsor policies and procedures, State law</li></ul></li></ul>	<ul style="list-style-type: none"><li>■ Allowable activities based on terms and conditions of contract</li><li>■ Management rules<ul style="list-style-type: none"><li>■ Terms of the contract; and</li><li>■ State contract law</li></ul></li></ul>

- Departments should use the FDP Subrecipient or Contractor Determination Form available on the OSP website to assist in making this determination.

# Subrecipient vs. Contractor

- Subrecipient 200.330(a)
  - Determines who is eligible to participate in a federal program
  - Has its performance measured against whether the objectives of the federal program are met
  - Is responsible for programmatic decision making
  - Is responsible for complying with federal program requirements
  - Uses the federal funds to carry out a program as compared to providing goods or services for a program
- Contractor 200.330(b)
  - Provides the goods and services within normal business operations
  - Provides similar goods or services to many different purchasers
  - Operates in a competitive environment
  - Provides goods or services that are ancillary to the operation of the federal program
  - Is not subject to compliance requirements of the federal program

# FDP Subrecipient or Contractor Determination Form

Available on OSP website:

Used to determine if entity is a subrecipient or a contractor.

Should be used to document determination prior to initiating agreement.

<http://www.umassmed.edu/research/funding/sratoc/>

### Checklist to Determine Subrecipient or Contractor Classification

**OBJECTIVE:** Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, this form may provide assistance in making an accurate determination.

**DEFINITIONS FROM UNIFORM GUIDANCE (2 CFR, PART 200):**

- Subrecipient:**  
*\$200.93 Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding*
- Contractor:**  
*\$200.23 Contractor means an entity that receives a contract as defined in \$200.22 Contract.  
\$200.22 Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.*

**INSTRUCTIONS:** Complete sections one and two of the checklist by marking all characteristics that apply to the outside entity. The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the University. On occasion there may be exceptions to the type of relationship indicated by the completed checklist. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the University and the outside entity. Section 3 should be used to provide documentation on the use of judgment in determining the proper relationship classification.

NAME OF OUTSIDE ENTITY: \_\_\_\_\_

**SECTION 1 - SUBRECIPIENT**

**Description:** A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the contractor:

- ☐ 1. Determines who is eligible to receive what Federal assistance;
- ☐ 2. Has its performance measured in relation to whether objectives of a Federal program were met;
- ☐ 3. Has responsibility for programmatic decision making;
- ☐ 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.
- Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.*

**SECTION 2 - CONTRACTOR**

**Description:** A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:

- ☐ 1. Provides the goods and services within normal business operations;
- ☐ 2. Provides similar goods or services to many different purchasers;
- ☐ 3. Normally operates in a competitive environment;
- ☐ 4. Provides goods or services that are ancillary to the operation of the Federal program.
- Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.*

**FINAL DETERMINATION:**

☐ SUBRECIPIENT

☐ CONTRACTOR

**OPTIONAL - SECTION 3 - USE OF JUDGMENT** (use only when the determination cannot clearly be made using the above criteria)

**Description:** In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

*Explanation of Use of Judgment Determination:*

Prepared By: \_\_\_\_\_

Date: \_\_\_\_\_



# Specific Requirements for Pass-Through-Entities 200.331(a)

OSP is required to ensure that every subaward contains the following information relating to federal award identification (13 data points):

1. Subrecipient name (must match the name associated with its unique entity identifier)
2. Subrecipient unique entity identifier
3. Federal Award Identification Number (FAIN)
4. Federal Award Date
5. Period of performance start and end date
6. Amount of federal funds 'obligated by this action'
7. Total amount of federal funds 'obligated to the subrecipient'
8. Total amount of the federal award
9. Federal award project description for FFATA purposes
10. Name of federal awarding agency, pass-through entity, and contact official
11. CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement
12. Whether the award is for "research and development"
13. The indirect cost rate

- When reviewing the subrecipient OSP will consider the following risk factors:
  - Subrecipient's prior experience with the grant program
  - Results of previous audits
  - New personnel or substantially changed systems
  - Results of prior federal monitoring

# Specific Conditions 200.331(b) and 200.207

Based on its evaluation, pass-through-entity may consider imposing additional federal award conditions, if appropriate, such as:

- Require reimbursement;
- Withhold funds until evidence of acceptable performance;
- More detailed reporting;
- Additional monitoring;
- Require grantee to obtain technical or management assistance; or
- Establish additional prior approvals.

- Pass-through-entity must monitor its subrecipients to assure compliance and performance goals are achieved
- Monitoring must include:
  1. Review of financial and programmatic reports
  2. Ensuring corrective action
  3. Issue a “management decision” on audit findings



- Pass-through entity must verify all subrecipients meeting the \$750K threshold have single audits
  - OSP performs this review/verification
- Audit threshold raised from \$500K in Circular A-133 to \$750K in the Uniform Guidance

# Important Internal Controls

Oversight responsibility for subrecipient monitoring is tied very closely to internal controls that non-federal entities including pass-through entities, are required to have in place. This includes having:

- Well-trained and knowledgeable staff members
- Sufficient resources (financial and staffing) dedicated to subrecipient monitoring
- Oversight managers with knowledge to identify the most appropriate methods/tools and extent of monitoring to be used
- Indicators to help identify risks from outside factors that may affect a subrecipient's performance (those related to economic conditions, political changes, regulatory changes or unreliable information)
- Official written policies and procedures (e.g., methodology for resolving findings of noncompliance or internal control weaknesses)
- Follow-up processes to ensure timely appropriate actions are taken or completed on a subrecipient's reported deficiencies
- Reviews of the subrecipient's financial and programmatic reports

# Subrecipient Monitoring Tools Available on the OSP Website:

- Monitoring Record
- Monitoring Guide
- FDP Sub v. Contractor Determination Form



## Sponsored Programs

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[Subaward Life Cycle](#)

## Contracts and Research Agreements

### Contracts and Subcontracts

OSP leadership and teams review and negotiate research agreements and subcontracts. Please forward the following to OSP for review prior to the receipt of an award:

- For Contracts:
  - a completed and fully signed PeopleSoft Routing Form
  - a detailed internal budget worksheet
  - a completed and signed Conflict of Interest Disclosure Summary for each UMMS key person
- For Subcontracts:
  - the above, plus a Statement (or Scope) of Work
  - OSP will generate Letter of Intent

These forms can be found on the [OSP Forms](#) page. Please contact [research.funding@umassmed.edu](mailto:research.funding@umassmed.edu) for further information.

### Subrecipient Monitoring

UMass Medical School is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. Subawards are subject to federal and/or agency-specific regulations established by the prime sponsor.

This guidance has been developed to assist administrators at the department and central level with subrecipient monitoring. The use of these tools and scope of monitoring procedures should be determined by the PI and administrators based on the nature of the grant and the perceived risk associated with the subrecipient. All of the following forms are optional; however, additional monitoring efforts should always be implemented if there is any question about the subrecipient's ability to ensure proper use and financial management of sponsor funds during any stage of the award.

[UMMS Subrecipient Monitoring Guide](#)

[Domestic Subrecipient Questionnaire](#)

[Foreign Subrecipient Questionnaire](#)

[UMMS Subrecipient Risk Assessment Matrix](#)

[UMMS Subrecipient Monitoring Record](#)

[UMMS Invoice Monitoring Guide](#)

[FDP Subrecipient or Contractor Determination Form](#)

# Subaward Invoice Monitoring Guide & Monitoring Record

## UMMS SUBAWARD INVOICE MONITORING GUIDE

How to Use: The guide is a list of 11 questions for departments to consider when monitoring subaward invoices for completeness and compliance with UMMS's policies.

1. Are the expenses allowable per the subaward and the prime award? Remember the prime award requirements and budget restrictions flow down to the subrecipient.
2. Are the invoiced expenses included in the subaward budget? The subrecipient should only invoice for approved expenses per the subaward or ask for approval of budget changes when necessary to modify the original terms/budget.
3. Are the expenses in the agreement consistent with the programmatic plan or work completed to date? The expenses invoiced should agree with the work incurred.
4. Obtain Principal Investigator's (PI) approval and signature on the subrecipient invoice.
5. Were all the expenses incurred within the subaward start and end dates? Ensure that the dates on the invoice are within the subaward dates.
6. Are the cumulative expenses within the overall approved budget amount? Ensure that subrecipients are not invoicing for amounts over the approved budget.
7. Are the invoice expenses per budget category in agreement with the budgeted amount per line item category?
8. Do expenses appear to be based on actual expenses? Cost reimbursable subcontracts require invoicing **based on actual expenses only**.
9. Does the invoice total correctly?
10. Are the Facilities & Administration (F&A) costs calculated correctly with the correct and agreed upon rate for the subrecipient? Ensure the calculated F&A agrees with the methodology in the budget and applies the appropriate base (e.g., Modified Total Direct Cost) for F&A recovery.
11. Does the invoice have an **institutional official signature** and contain the following statement: "I certify that all expenditures reported (or payment requested) are for appropriate purposes and in accordance with the provisions of the application and award documents."

**REMEMBER:** Most invoices do not include a large amount of detail. Ask the subrecipient for back-up documentation on specific budget line items if something does not appear correct.

**IF THERE ARE ANY QUESTIONS ON THE INVOICES, DO NOT APPROVE UNTIL ALL ITEMS ARE APPROPRIATELY RESOLVED.**

## UMass Medical School Subrecipient Monitoring Record

**How to use:** The Subrecipient Monitoring Record can be used by departments to document subrecipient monitoring efforts and maintain an audit trail. Use of the tracking record is encouraged at all risk levels but is strongly encouraged for medium and high risk subrecipients.

### UMass Medical School

UMMS PI Name: \_\_\_\_\_  
UMMS PS Award#: \_\_\_\_\_  
UMMS Subaward#: \_\_\_\_\_

### Subrecipient

Subrecipient Name: \_\_\_\_\_  
Subrecipient PI: \_\_\_\_\_  
Subrecipient Contact: \_\_\_\_\_

### Subrecipient Period of Performance

Start Date: \_\_\_\_\_ End Date: \_\_\_\_\_

### Project Invoicing Frequency

☐ Monthly ☐ Quarterly

### Individual Responsible for Maintaining this Monitoring Record

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Phone#: \_\_\_\_\_

### Scheduled Reporting Dates (based on the terms of the grant award)

DATE	COMMENTS	ACTUAL DATE*

\*dates entered as each report is submitted

### Informal Progress Reports Completed (these should generally take place at least quarterly)

DATE	METHOD	COMMENTS

### Other Communications

DATE	METHOD	COMMENTS

# Departmental Responsibilities

- Working with OSP to set up Contracts and Amendments
  - When new Notices are issued
  - When changes are needed
- Working with Sites to obtain proper documentation
  - At time of JIT, Award, Progress Reports, Closeout
- Working with OSP/Accounts Payable for POs
  - When new contracts are established and as amendments are issued to change amounts
- Working with sites and Financial Services to pay invoices
  - Monitor the timeliness of the invoices
  - Monitor the contents of the invoices
- Working with PIs to ensure scientific progress
  - Signatures on Invoices on a regular basis
- Working with PIs/OSP/Sponsor for prior approval changes as needed
  - Refer to your Notice of Award and Contract.
  - Anything that we need to request prior approval for will apply to the subcontracted site too
- Monitoring Carryforwards from budget years
  - Automatic or prior approval – both from the Prime and UMMS

# Departmental Tools

- UMMS Subrecipient Monitoring Guide
- UMMS Subrecipient Monitoring Record
- Departmental Forms
- Calendar Reminders
- Office of Sponsored Programs
- Office of Financial Services

# APPENDIX



## Guidance for Adjustments to Appointment Records in xTrain to Reflect Stipend Level Increases for Postdoctoral Trainees on Institutional Ruth L. Kirschstein National Research Service Awards (NRSA)

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Notice Number: NOT-OD-17-057

### Key Dates

**Release Date:** April 13, 2017

### Related Announcements

[NOT-OD-17-002](#)

### Issued by

National Institutes of Health ([NIH](#))

### Purpose

The purpose of this Notice is to provide additional guidance regarding the process recipients of Kirschstein-NRSA institutional training grants (T32, T35, T90, TL1) will need to follow in order to properly reflect adjustments to appointment records for trainees when the training grant received supplemental funding in response to [NOT-OD-17-002](#).

This notice also alerts training grant awardees meeting the criteria established in NOT-OD-17-002 that they must submit applications by June 30th, 2017, in order to receive supplemental funding from NIH to accommodate stipend level increase.

### Process for Institutional Training Grants:

As a general reminder, applicants may not increase the number of appointees under the current NRSA institutional training grant as a result of the supplemental funding notice. Applications for supplemental funding must reflect the current experience level of each postdoctoral appointee, which cannot be adjusted as a result of this notice.

Applicants must be careful to accurately identify the number of postdocs at each level and request an accurate, corresponding supplemental dollar amount. Applicants should only request funds to cover increases in stipends for postdoctoral trainees at experience levels 0, 1 and 2 from December 1, 2016 up to the end date of the period of appointment.

In order to accurately document the stipend level increase for currently appointed postdoctoral trainees, an amended appointment must be submitted through xTrain for each trainee as follows:

### To amend a stipend within xTrain:

- On the Trainee Roster screen for the parent award (not the supplement award, which is listed above the parent award) select Amend 2271 from the Action Column for the desired Trainee.
- The system will open the 2271 form.
- Do not modify the Stipend Level or Salary drop-down value; instead enter the new stipend level into the Stipend/Salary/Other Compensation field. The amount entered should reflect the stipend that the trainee will have received for their period of appointment including the additional funds received from the supplement.
- You may route the form for Trainee verification, or submit the amendment to Agency for review.
- When submitting the 2271 to Agency, the system will prompt you for a comment, please indicate that this amendment is in reference to “Stipend increase per NOT-OD-17-002 and as reflected on 3T32IC00000S1”.

\*Appointments, re-appointments, and amended appointments documenting the stipend level increase must be initiated on the parent award. Recipients should not submit these appointment forms for the supplemental award within xTrain.

No additional funds may be expended on behalf of trainees identified within supplemental request until an amended appointment has been submitted and accepted in xTrain. If a recipient fails to submit these forms, NIH may take one or more enforcement actions, such as a decision to disallow costs or withhold a non-competing continuation award, consistent with [NIHGPS Chapter 8.5.2](#).

For trainees with start dates that do not require amending, namely appointments that start after 12/01/2016 but are for FY2016, FY2015 or FY2014. Recipients will need to create the appointment or reappointment, select the appropriate stipend level, and then modify the stipend amount to reflect the correct amount (see item #3 above). Recipients will not be required to submit amended appointments for FY2017 appointments made on or after December 1, 2016, or for appointments for FY2016 and earlier fiscal years, where appointments are active on December 1, 2016, but where stipends were supplemented from institutional funds, rather than NRSA supplemental funds.

It is important for NIH to note, that for a subset of supplements issued in response to [NOT-OD-17-002](#), the Type 3 supplement will not be issued in the same account as the parent award (pooled account) based on NIH's transition to P subaccounts in PMS. In these particular cases, recipients will be required to submit a separate FFR accounting for the supplemental funds awarded in the PMS subaccount no later than 90 days after the end of the calendar quarter in which the budget period ends.

Additional information on how to submit appointment forms in xTrain can be found using the [xTrain Appointment, Re-Appointment, and Amendment Quick Reference Guide for Institution Users](#).

#### Inquiries

Please direct all inquiries to:

Division of Grants Policy  
Office of Policy for Extramural Research Administration (OPERA)  
Phone: 301-435-0938  
Email: [GrantsPolicy@od.nih.gov](mailto:GrantsPolicy@od.nih.gov)

For any specific financial or grants management questions regarding the administrative supplement notice ([PA-16-287](#)) please contact the Grants Management Specialist or Grants Management Officer listed on the NoA of the most recent parent award.

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[Weekly TOC for this Announcement](#)  
[NIH Funding Opportunities and Notices](#)

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DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review

6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

April 10, 2017

[REDACTED]  
University of Massachusetts Medical School  
[REDACTED]

Dear Dr. [REDACTED]

Your application entitled [REDACTED] has been analyzed by the Division of Receipt and Referral at the Center for Scientific Review at the NIH. Your application has been found to contain information that should be within the page limits of the Research Strategy inappropriately placed in other sections of the application. Specifically, this information was found in Authentication of Key Biological and/or Chemical Resources section. Therefore, the application cannot proceed in the referral and review process.

Beginning with applications targeting due dates on or after January 25, 2010, NIH converted to a restructured application package and shorter page limits for most activity codes. These page limits must be adhered to and it is not permissible to add material to inappropriate sections (e.g. appendix , vertebrate animals etc) to circumvent the specified page limits. See:

- NOT-OD-07-018 -- New Limits on Appendix Materials (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-07-018>) to be replaced with
- NOT-OD-16-129 -- New Policy Eliminates Most Appendix Material for NIH/AHRQ/NIOSH Applications Submitted for Due Dates On or After January 25, 2017 (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-129.html>)
- NOT-OD-11-080 -- Reminder: Compliance with NIH Application Format and Content Instructions (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-11-080.html>)
- NOT-OD-15-095 Reminder: NIH Policy on Application Compliance (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-095.html>)

We regret that we must withdraw your application at this time. The next due date is June 5, 2017. If you have any questions concerning this action, please contact me or anyone else in this office.

[REDACTED]  
[REDACTED]



DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review

6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

April 14, 2017

[REDACTED]  
University of Massachusetts Medical School

[REDACTED]  
Worcester, MA 01655-0002

Dear Dr. [REDACTED]

Your application ([REDACTED])  
[REDACTED] has been identified as having Appendix content that is not compliant with NIH/AHRQ/CDC policy NOT-OD-16-129 (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-129.html>). Very limited items are allowed in appendices. In the case of your application, you have included over 20 pages of data term explanations in 2 tables. Because this unallowable material is in the Appendix, your application is being withdrawn.

For more information about this policy, see:

- NOT-OD-17-035: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-17-035.html>
- FAQs: [https://grants.nih.gov/grants/policy/appendix\\_policy.htm](https://grants.nih.gov/grants/policy/appendix_policy.htm)

The next due date for your application is June 5, 2017. Please consider submitting a compliant application at that time.

If you have any questions, please do not hesitate to contact me or anyone else in this office.

Sincerely,

[REDACTED]  
Division of Receipt and Referral  
Center for Scientific Review

[REDACTED]  
[REDACTED]



DEPARTMENT OF HEALTH AND HUMAN SERVICES

National Institute of Health  
Center for Scientific Review

6701 Rockledge Drive  
Bethesda, Maryland 20892  
Tel: 301-435-0715

[REDACTED]  
University of Massachusetts Medical School  
55 Lake Avenue North  
Worcester, MA 01655-0002

Dear Dr. [REDACTED]

**THIS NOTE SERVES AS A WARNING AND NO ACTION IS REQUIRED AT THIS TIME.**

During the review of your application entitled [REDACTED]

[REDACTED] NIH staff and/or reviewers noted that one or more of the biosketches included in the application did not comply with the new biosketch format requirements (NOT-OD-15-032; <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html>). Applications with biosketches that do not follow the current guidelines for format and content are non-compliant. You should be mindful that non-compliance can have serious consequences. NIH may withdraw any application identified during the receipt, referral and review process that is not compliant with the instructions in the SF424 (R&R) Application Guide, the Funding Opportunity Announcement, and relevant NIH Guide Notices (see <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-095.html>). Instructions for preparing a compliant biosketch can be found at <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html>.

**Your current application will not be withdrawn.** There is no need to correct your biosketch(s) at this time. Indeed, as stated in NOT-OD-13-030, <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-13-030.html>, you cannot submit updated biosketches after the submission of the grant application.

**If you have any questions regarding this correspondence, please contact the Scientific Review Officer who managed review of your application; that information can be found in eRA Commons or at the end of the meeting roster on your summary statement.** Also, please feel free to contact anyone in this office, at the e-mail address provided below, if you need more clarification about implementation of this policy.

The Division of Receipt and Referral  
[csrdrr@mail.nih.gov](mailto:csrdrr@mail.nih.gov)



# Sponsored Programs



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## Contracts and Research Agreements

### Contracts and Subcontracts

OSP leadership and teams review and negotiate research agreements and subcontracts. Please forward the following to OSP for review prior to the receipt of an award:

- For Contracts:
  - a completed and fully signed PeopleSoft Routing Form
  - a detailed internal budget worksheet
  - a completed and signed Conflict of Interest Disclosure Summary for each UMMS key person
- For Subcontracts:
  - the above, plus a Statement (or Scope) of Work
  - OSP will generate Letter of Intent

These forms can be found on the [OSP Forms](#) page. Please contact [research.funding@umassmed.edu](mailto:research.funding@umassmed.edu) for further information.

## Subrecipient Monitoring

UMass Medical School is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. Subawards are subject to federal and/or agency-specific regulations established by the prime sponsor.

This guidance has been developed to assist administrators at the department and central level with subrecipient monitoring. The use of these tools and scope of monitoring procedures should be determined by the PI and administrators based on the nature of the grant and the perceived risk associated with the subrecipient. All of the following forms are optional; however, additional monitoring efforts should always be implemented if there is any question about the subrecipient's ability to ensure proper use and financial management of sponsor funds during any stage of the award.

[UMMS Subrecipient Monitoring Guide](#)

[Domestic Subrecipient Questionnaire](#)

[Foreign Subrecipient Questionnaire](#)

[UMMS Subrecipient Risk Assessment Matrix](#)

[UMMS Subrecipient Monitoring Record](#)

[UMMS Invoice Monitoring Guide](#)

[FDP Subrecipient or Contractor Determination Form](#)

## Checklist to Determine Subrecipient or Contractor Classification

**OBJECTIVE:** Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, this form may provide assistance in making an accurate determination.

### **DEFINITIONS FROM UNIFORM GUIDANCE (2 CFR, PART 200):**

**Subrecipient:**

*§200.93 Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding*

**Contractor:**

*§200.23 Contractor means an entity that receives a contract as defined in §200.22 Contract.*

*§200.22 Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.*

**INSTRUCTIONS:** Complete sections one and two of the checklist by marking all characteristics that apply to the outside entity. The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the University. On occasion there may be exceptions to the type of relationship indicated by the completed checklist. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the University and the outside entity. Section 3 should be used to provide documentation on the use of judgment in determining the proper relationship classification.

**NAME OF OUTSIDE ENTITY:** \_\_\_\_\_

### **SECTION 1 - SUBRECIPIENT**

**Description:** A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the contractor:

- ☐ 1. Determines who is eligible to receive what Federal assistance;
- ☐ 2. Has its performance measured in relation to whether objectives of a Federal program were met;
- ☐ 3. Has responsibility for programmatic decision making;
- ☐ 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

*Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.*

### **SECTION 2 - CONTRACTOR**

**Description:** A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:

- ☐ 1. Provides the goods and services within normal business operations;
- ☐ 2. Provides similar goods or services to many different purchasers;
- ☐ 3. Normally operates in a competitive environment;
- ☐ 4. Provides goods or services that are ancillary to the operation of the Federal program.

*Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.*

### **FINAL DETERMINATION:**

☐

**SUBRECIPIENT**

☐

**CONTRACTOR**

### **OPTIONAL - SECTION 3 - USE OF JUDGMENT** (use only when the determination cannot clearly be made using the above criteria)

**Description:** In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

*Explanation of Use of Judgment Determination:*

**Prepared By:** \_\_\_\_\_

**Date:** \_\_\_\_\_



## UMMS SUBAWARD INVOICE MONITORING GUIDE

How to Use: The guide is a list of 11 questions for departments to consider when monitoring subaward invoices for completeness and compliance with UMMS's policies.

1. Are the expenses allowable per the subaward and the prime award? Remember the prime award requirements and budget restrictions flow down to the subrecipient.
2. Are the invoiced expenses included in the subaward budget? The subrecipient should only invoice for approved expenses per the subaward or ask for approval of budget changes when necessary to modify the original terms/budget.
3. Are the expenses in the agreement consistent with the programmatic plan or work completed to date? The expenses invoiced should agree with the work incurred.
4. Obtain Principal Investigator's (PI) approval and signature on the subrecipient invoice.
5. Were all the expenses incurred within the subaward start and end dates? Ensure that the dates on the invoice are within the subaward dates.
6. Are the cumulative expenses within the overall approved budget amount? Ensure that subrecipients are not invoicing for amounts over the approved budget.
7. Are the invoice expenses per budget category in agreement with the budgeted amount per line item category?
8. Do expenses appear to be based on actual expenses? Cost reimbursable subcontracts require invoicing **based on actual expenses only**.
9. Does the invoice total correctly?
10. Are the Facilities & Administration (F&A) costs calculated correctly with the correct and agreed upon rate for the subrecipient? Ensure the calculated F&A agrees with the methodology in the budget and applies the appropriate base (e.g., Modified Total Direct Cost) for F&A recovery.
11. Does the invoice have an **institutional official signature** **and** contain the following statement: "I certify that all expenditures reported (or payment requested) are for appropriate purposes and in accordance with the provisions of the application and award documents."

**REMEMBER:** Most invoices do not include a large amount of detail. Ask the subrecipient for back-up documentation on specific budget line items if something does not appear correct.

**IF THERE ARE ANY QUESTIONS ON THE INVOICES, DO NOT APPROVE UNTIL ALL ITEMS ARE APPROPRIATELY RESOLVED.**

**How to use:** The Subrecipient Monitoring Record can be used by departments to document subrecipient monitoring efforts and maintain an audit trail. Use of the tracking record is encouraged at all risk levels but is strongly encouraged for medium and high risk subrecipients.

### Subrecipient

Subrecipient Name: \_\_\_\_\_  
Subrecipient PI: \_\_\_\_\_  
Subrecipient Contact: \_\_\_\_\_

### Project Invoicing Frequency

☐ Monthly ☐ Quarterly

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Phone#: \_\_\_\_\_

[illegible]

\*dates entered as each report is submitted

[illegible][illegible]

**ACRONYMS AND TERMS USED TODAY**  
**OSP RA Update - 4/26/2017**

ACRONYM/TERM	DESCRIPTION
APR	Annual Progress Report
CSR	Center for Scientific Review (NIH)
eRA Commons	The eRA Commons is NIH's online interface where signing officials, principal investigators, trainees and post-docs at institutions/organizations can access and share administrative information relating to research grants and process prior approval requests.
NIH	National Institutes of Health
NOT	A Notice (Guide Notice) is an official NIH announcement relating to a change in policy, procedure, form, or system. Notices are posted on the NIH website and users can be notified via a variety of NIH listservs. You can search for notices and funding opportunities at the NIH Guide.
NRSA	National Research Service Award
OSP	Office of Sponsored Programs
PI	Principal Investigator
PRF	Proposal Routing Form
RAU	Research Administration Update
RPPR	Research Performance Progress Report
SO	Signing Official
SUMMIT	SUMMIT is the UMass Medical School's web based reporting tool.
T32	Activity code for NIH's Institutional National Research Service Award
T35	Activity code for NIH's NRSA Short -Term Research Training Award
T90	Activity code for NIH's Interdisciplinary Research Training Award
TL1	Activity code NIH's Linked Training Award (administratively linked to another project like a U54 or UL1
xTRACT	Extramural Trainee Reporting and Career Tracking (xTRACT) is a module within eRA Commons used by applicants, grantees, and assistants to create research training tables for inclusion in progress reports and institutional training grant applications.