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1 Cost Transfer Review – Return vs Reject

In July 2018, OSP provided a deviation from the cost transfer review process and “returned” rather than ‘reject” cost transfers that were not fully documented and/or have all the required information; therefore not meeting the requirements outlined in Cost Transfer Policy - 1305.

Effective February 18th, 2019, OSP will revert to rejecting cost transfer upon initial review, that do not meet the requirements and are not in accordance with the Cost Transfer Policy - 1305 and Cost Transfer Procedure - 1305 PR.02

The cost transfers will be reviewed in its entirety and all the items which do not meet the criteria will be indicated in the OSP email to the preparer and approver of the cost transfer. In cases where a rejected cost transfers includes a credit to a sponsored award, OSP will move the charge to a departmental suspense account, as was done prior to the deviation.
PROCUREMENT IMPACTS DUE TO FEDERAL POLICY CHANGES

Just a reminder that changes have been made to the Procurement Policies and Procedures consistent with Uniform Guidance requirements as set forth by the Federal Government (2 CFR 200). The key changes consist of new bidding requirements as well as additional documentation as set forth below.

New Bidding Requirements

<table>
<thead>
<tr>
<th>PO Value</th>
<th>Minimum Number of Bids/Quotes</th>
<th>Applies to Federal and Non-Federal Funds</th>
<th>Additional Documentation Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under $10,000</td>
<td>Not required; however, price must be reasonable</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>$10,000-$149,999</td>
<td>2</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>$150,000 and above</td>
<td>3</td>
<td>Yes</td>
<td>Yes (see below)</td>
</tr>
</tbody>
</table>

Additional Requirements

For purchases with Federal Funds over $150K the following is required:

- An Independent Cost Estimate must be prepared by the department (with Procurement assistance) prior to publicizing bids
- Requests for proposals (RFP) must be publicized (performed by Procurement)
- All RFP evaluation factors and their relative importance must be listed in the RFP (performed by Procurement)
- A written method for performing the technical evaluation of proposals and selecting recipients must be prepared (performed by Procurement)
- A written summary must be prepared identifying the reason for award with price and other factors considered must be performed by the department (with Procurement assistance)

Departments should contact the purchasing department (purchasing.helpdesk@yale.edu) for assistance with purchases over $150K in Federal funds.

The August 2018 Brown Bag meeting included a segment on Uniform Guidance Procurement Requirements. You can view a video or the slide presentation of the meeting on the [OSP Brown Bag page on the OSP website](#).
3 **PATENT POLICY ACKNOWLEDGMENT & AGREEMENT**

Who is required to complete the Patent Policy Acknowledgment & Agreement (PPAA)?

**All paid employees of the University, as well as all Yale personnel identified as devoting effort on a sponsored project are required to complete the PPAA certification.**

To clarify, employment at the University is the driving factor. Anyone devoting effort will be required to complete the PPAA and anyone who is not devoting effort, but is a paid employee of the University, will also be required to complete the PPAA. ‘All paid employees of the University’ includes those who may have a joint appointment i.e.: with the VA.

4 **OSP PORTFOLIO ASSIGNMENTS**

The following team portfolios have been recently updated and can be found on [OSP’s Contact Us webpage](#):

- Award Management, including NGOs
- Clinical Trial Management
- Contract Management, including MTAs

Should you have any questions, please contact the responsible official listed.

5 **OSP BROWN BAG MEETINGS**

**Upcoming Brown Bag Meeting**

Join us for the next Brown Bag meeting scheduled for February 13, 2019 at 25 Science Park. [Visit the TMS Brown Bag webpage](#) to view the agenda and event details.

**January 2019 Brown Bag Comments, Questions and Follow-up**

- We received several comments about the award setup process and how departments can check how far along their award is in the setup process.
  - The award setup process was covered in the November 2018 Brown Bag session, as well as pointers on how to navigate through PT in IRES to find the status of an award. You can view a video of the session and review the slide presentation on OSP’s [Brown Bag webpage](#).
• Comment: It still takes too long to get awards setup.
  o When OSP is behind standard service level agreement time frames we inform the research administration community. Please be aware that for non-federal sponsors, negotiation times can create a considerable delay. What may be considered a delay on your end, may be within our normal timeframes.

• Question: In regard to pre-award and proposal budgets, are there any experts in budgeting undergraduate or graduate students. Or any resources for tuition costs?
  o Unfortunately, there are multiple solutions for handling tuition costs and it seems every department handles this differently. Work with your department’s Lead Administrator and your OSP proposal manager when this situation comes up.

• We received several questions and comments about the Workday webform.
  o We realize the current webform doesn’t meet all our needs and we’re currently in the beginning stages of revising the form. Once completed, the new form will be introduced at a future Brown Bag meeting. If you have any suggestions for revising the form, please let us know at ires@yale.edu or osp.trainings@yale.edu.

• As a follow-up to the Subaward Monitoring presentation, below is a list of resources to refer to for information on subrecipient monitoring. Most questions can be resolved by reading Policy 1307 Subrecipient – Establishing, Managing, and Monitoring, and its counterpart Procedure linked to below. However, if you still have questions contact your Subaward Manager.
  o 1307 PR.01 Establishing Subrecipients Associated with Sponsored Programs
  o 1307 PR.02 Managing Subrecipient Activity Associated with Sponsored Programs
  o 1307 PR.03 Monitoring Subrecipient Activity Associated with Sponsored Programs
  o Subaward Management Team:
    – Jeanette Culbreath – GCAT3 and GCAT1
    – Jennifer Hayek – GCAT4 and GCAT2
    – Melissa Norton – GCAT5 and GCAT2
    – Lauren Pite – GCAT2 and GCAT1
    – Dennis Titley – Sr. Financial Analyst responsible for auditing and assisting with subaward financial issues
  o Subrecipient Basics and Monitoring Training
− Take online or check TMS for the next instructor-led training held twice a year

6 OSP STAFF UPDATES

6.1 FINANCIAL MANAGEMENT

Steffi Harris has been promoted to the position of Senior Accountant effective February 1, 2019. Steffi has been a part of Financial Management since June 2017 as a Junior Accountant and we are excited to have her continue her career with us, in this capacity. Please continue to work with your assigned OSP Accountant, as Steffi will be going through training over the next several weeks. Once her portfolio is assigned, a separate communication will be sent.

Michelle O’Keefe joined the Financial Reporting Group as a Senior Accountant on February 6, 2019. Michelle comes to OSP with experience in both the private and public sector as well as grant experience both in pre and post award from her time working in the department of Pediatrics. Please continue to work with your assigned OSP Accountant, as Michelle will be going through training over the next several weeks. Once her portfolio is assigned, a separate communication will be sent.

7 SPONSOR UPDATES

7.1 NATIONAL SCIENCE FOUNDATION - NEW RESUMPTION OF OPERATIONS WEBPAGE!!

A Resumption of Operations at NSF webpage has been developed that includes Important Notice No. 145, Resumption of Operations at the National Science Foundation, dated January 28, 2019, as well as supplemental guidance that addresses grant and cooperative agreement-related policy and systems issues. This page will continue to be updated as new information becomes available.

7.2 NATIONAL INSTITUTES OF HEALTH – eRA INFORMATION – ASSIST APPLICATION PREVIEWS PRIOR TO DEC. 12 TO BE REMOVED

Last December, the NIH made some technology changes to how ASSIST manages uploaded attachments and generates application and form previews. All uploaded attachments and new application and form previews were migrated to the new technology.
On February 27, 2019, access to any application previews generated in ASSIST prior to December 12, 2018 will be removed. A fresh preview can be generated at any time. Individual files uploaded in ASSIST and any submitted and assembled application images accessed in eRA Commons will remain in place.

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1 Thank you to all who have contributed to this newsletter. Please direct questions or suggestions regarding newsletter content to Tracy Coston at osp.communications@yale.edu or tracy.coston@yale.edu. To unsubscribe, visit https://subscribe.yale.edu/browse?search=OSP. For archived issues, visit OSP News & Updates archives.