OMB Circular A-81 Update
and
Introducing OSP!

OSP Brown Bags
September 29, 2015
October 2, 2015

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University Research Compliance Officer
Office of Research Compliance
and
Office of Sponsored Projects Staff
What is A-81?
- Guidance to the Federal Agencies to streamline administrative burdens, and to strengthen oversight of federal funds to reduce fraud, waste, and abuse
- Combines 8 Office of Management and Budget (OMB) Circulars into a single Circular

Purpose of A-81?
- To create uniformity among the agencies and that is why it was referred to as

Uniform Guidance
But now it is referred to as the…

“Un”-uniform Guidance
A-81 applies to....

- All Federal new awards and new funding issued on or after December 26, 2014
- For most agencies this may be true but not for all.
  - ONR (Office of Naval Research) and all of DOD do not apply the new regulation to incremental funding if the award had a start date prior to December 26, 2014 but would apply the new regulation to supplemental funding.
Other examples un-uniformity…

- NIH does not permit 10% F&A rates to foreign subrecipients and is retaining 8%
- Some agencies are implementing COI policies separate and apart from the procurement changes
- Some agencies require the submission of final reports within 90 days while others adopted 120 days
- NIH applies the new regulations to carryover funds, other agencies do not

*What is being done and how do we keep it all straight?*
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What is being done?

- **Conflict of Interest**
  - COGR is engaging with OMB to advocate for clarifying FAQs to COI and/or request that new agency policies be “stayed” until more clarity and consistency is offered.

- **Procurement**
  - Introduction of micro-purchase threshold (under $3K)
    - Does not require competitive bidding
  - *BUT*, Yale’s current threshold is $10K for competitive bidding
  - Reaction to the changes to procurement - NEGATIVE
  - Implementation of the new procurement requirements received a *second* extension to July 1, 2017
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What is being done?

Cost Sharing

Under Federal research proposals, voluntary committed cost sharing is not expected. It cannot be used as a factor during the merit review of applications or proposals, but may be considered if it is both in accordance with Federal awarding agency regulations and specified in a notice of funding opportunity. Criteria for considering voluntary committed cost sharing and any other program policy factors that may be used to determine who may receive a Federal award must be explicitly described in the notice of funding opportunity.
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What is being done?

Examples of sponsor deviations

- **NIGMS** - “This FOA does not require cost sharing as defined in the NIH Grants Policy Statement”, "NIGMS encourages requests that reflect institutional commitment".

- **NASA** - “NASA strongly encourages, but does not require, that the submitting institution contribute to the cost of the proposed NIP project…”
COGR is working with OMB and suggesting that OMB create an ombudsman role to work with grantees and the federal awarding agencies.

- Report any deviations to your proposal/award manager

To review the COGR letter to OMB visit:

http://grants.yale.edu/a81
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What is being done?

- Federal-wide Research Terms and Conditions (RTC)
  - Largely based on the terms and conditions originally utilized by 98 research institutions participating in the Federal Demonstration Project (FDP), and termed "expanded authorities".
  - These standard terms and conditions for federal grants need to be updated
    - Agencies are committed to redrafting the RTC with NIH and NSF taking the lead
    - BUT the process will not be completed until Summer 2016
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How do we keep it all straight?

Creation of a Prior Approval
&
Other Requirements Matrix

http://grants.yale.edu/a81
Office of Sponsored Projects  
Uniform Guidance (A-81)  
Agency Prior Approvals Required / Waived and Other Requirements  
September 1, 2015

The following chart provides the federal regulatory requirements for new federal funding (new awards, supplements, continuation awards, etc.) with an effective date on or after December 26, 2014. Carefully read FOAs, sponsors’ handbooks and guides, and award documents for exceptions to the information below.

Note: This chart will be updated as new funding is received and agencies publish handbooks and guides. Greyed-out boxes indicate that Yale has not received new funding in order to make a determination of any changes.

Visit: [http://grants.yale.edu/a81](http://grants.yale.edu/a81) for the latest version of this chart.

<table>
<thead>
<tr>
<th>Agency Prior Approval Required (R) or waived (W)</th>
<th>EPA</th>
<th>NASA</th>
<th>NSF</th>
<th>NCI</th>
<th>USDA</th>
<th>DOD</th>
<th>DOE</th>
<th>DOC</th>
<th>DOI</th>
<th>OMB</th>
<th>HHS</th>
<th>ED</th>
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<tbody>
<tr>
<td><strong>General Administrative Requirements:</strong></td>
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<tr>
<td>90 day pre-award costs</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>R</td>
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<td>Pre-award costs greater than 90 days (must be for the effective and economical conduct of the project)</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
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<tr>
<td>Change in PI and other senior/key personnel specified in the application or award (Note: The NIH does not require prior approval for changes to other senior/key personnel named in the application.)</td>
<td>R</td>
<td>R</td>
<td>R</td>
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<tr>
<td>Change in senior/key personnel NOT specified in the application award (excluding PIs)</td>
<td>R</td>
<td>R</td>
<td>W</td>
<td>R</td>
<td>R</td>
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<td>PI/PD disengagement from the project for more than three months, or a 25% or greater reduction in time devoted to the project</td>
<td>R</td>
<td>R</td>
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<td>Change in scope and methodology of work</td>
<td>R</td>
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Introducing

the

Office of Sponsored Projects
(OSP)
OSP: Proposal Management

- **Responsibilities:**
  - Authorized official for all sponsored grant proposals
  - Provide guidance and interpretation of RFA/RFP/BAAs, etc.
  - Provide support for all submission issues regarding sponsored grant applications
  - Provide PD user support
  - Review, approve, and submit JIT information
OSP: Proposal Management

Staff:
- Amy Ellis, Associate Director
- Marybeth Brandi, Proposal Manager
- Kim Fiore, Proposal Manager (Effective October 19)
- Maria Kwon, Proposal Manager
- Adrienne Marable, Proposal Manager (Effective October 5)
- Jennifer Pomales, Proposal Manager
OSP: Award Management

Responsibilities:

- Review, negotiate, and approve grants and cooperative agreements
- Authorized Official (AOR) accepting awards on behalf of Yale
- Primary contact for sponsors in consultation with the PI and department staff as appropriate
- Approve and manage non-financial post-award activities. i.e., NCEs, PSAs, award transfers, etc.
- Provide assistance with the interpretation of sponsor requirements and federal regulations
- Review and submit RPPRs and other progress reports that require AOR signature
- Ensure University and sponsor policies, procedures, and processes are followed
OSP: Award Management

Staff:
- Cheryl Magoveny, Director
- Susan Hedley, Award Manager
- Diana Jones, Award Manager
- David Knapp, Award Manager
- Aurelie (Gigi) Martinez-Kennedy, Award Manager
- Brenda Pachucki, Award Manager
- Andrea Rogers, Award Manager
- Vacant position, Award Manager
Responsibilities:

- Conduct a risk analysis of each subrecipient
- Process federal and non-federal outgoing subawards
- Ensure compliance with the Federal Funding Accountability and Transparency Act (FFATA)
- Monitor subrecipients for its compliance with 2 CFR Part 200 Subpart F (A-133)
- Financial post award management of outgoing subawards
  - Assist in the resolution of financial questions related to invoicing
  - Ensure the Subaward Management System (SMS) accurately reflects subcontract funding and PTAO information
- Oversee and monitor subrecipients’ compliance with
- Preliminary review of NIH Just in Time Requests
OSP: Subaward Management

◆ **Staff:**
  
  - Lauren Pite, Associate Director
  - Dennis Titley, Sr. Financial Analyst
  - Jeanette Culbreath, Sponsored Project Specialist
  - Jennifer Hayek, Sponsored Project Specialist
  - Vacant position, Sponsored Project Specialist
OSP: Contract Management

Responsibilities:

- Review/approve proposals that will potentially result in a contract
- Review, negotiate, and execute contracts with corporate partners, the federal government, and other not-for-profits
- Provide information and support to faculty, staff, and others engaged in sponsored activities of a contractual nature
- Advance research collaborations with corporations
- Expand the research and technological capabilities of faculty
- Other agreements handled include:
  - Confidentiality Agreements (CDAs)
  - Material Transfer Agreements (MTAs)
  - Sponsored Research Agreements (SRAs)
  - Service and Fee for Service Agreements
  - Visiting Scientist Agreements
OSP: Contract Management

**Staff:**
- Donald Deyo, Director
- Brandon Romanchok, Assistant Director, Non-governmental Organizations
- Christopher Browe, Senior Contract Manager
- Jeffrey McGuinness, Senior Contract Manager
- Maneesha Joshi, Lead Contract Manager
- William Gunther, Contract Manager
- Patricia Ingellis, Contract Manager
- Vali Gazula, Material Transfer Agreement Manager
- Donald Wiggin, Material Transfer Agreement Manager
Responsibilities:

- Develop, review, negotiate, and execute clinical trial agreements, confidential disclosure agreements and other sponsor contracts that support the clinical trial activities of Yale University in accordance with University standards.
- Assist in the creation, negotiation, and implementation of clinical trial budgets and informed consent documents.
- Provide guidance to department faculty and staff regarding the interpretation of contract provisions, federal regulations, University policies and sponsor requirements.
- Collaborate and consult with other University offices including HRPP, ORA, YCCI, and OGC regarding clinical trial activities and issues.
OSP: Clinical Trials Management

Staff:
- Jeffrey Allen, Director
- Tanisha Asbery, Senior Contract Manager
- Judith Barbosa, Contract Manager
- Holly Robinson, Contract Manager
- Vacant Position, Contract Manager
- Vacant Position, Assistant Director, Clinical Agreements
OSP: Financial Management

- **Responsibilities:**
  - Work closely with faculty and department business office staff to ensure financial compliance and proper accounting of externally sponsored funds.
  - Financial Reporting
  - Cost Transfer Reviews
  - Award Closeouts
  - Cash Management
    - Letter of Credit draws (LOC)
    - Sponsor invoicing
    - Process sponsor payments
    - Track and collect sponsored project receivables
  - Effort Reporting
  - Audits and Reviews
OSP: Financial Management

- **Staff:**
  - Nancy Kendrick, Director
  - Kenechia Clarke, Manager
  - Kathleen King, Lead Accountant
    - Elvira Barbiero, Accountant III
    - Sandra Phillips, Accountant III
    - Mamadou Bah, Accountant
    - Vacant position, Accountant
  - Melissa Tebo, Lead Accountant
    - Aaron Green, Accountant III
    - Jason Wells, Accountant III
    - Stella Damoah, Accountant
    - Robert Sember, Accountant
    - Vacant position, Accountant
Staff (cont.):

- Lan Virasak, Associate Director
- John Maloney, Manager, Annual Audits & Reviews
- Ericka Kundrath, Financial Analyst, Effort Reporting
- Valerie Warhall, Financial Analyst, LOC
- Margaret Conway, Manager, Invoicing & Non-financial Closeouts
  - Gerri Gill, Senior Accountant, Collections
  - Jessica Grey, Invoice Coordinator
  - Eileen Joyce, Manager, Award Closeouts
**Responsibilities:**

- Monitor, review, and analyze new and proposed revisions to legislation and regulatory guidelines for potential sponsored projects administration changes.
- Maintain and update procedures for sponsored projects administration in accordance with University policy and Federal regulations.
- Develop, deliver, and support training and continuing education.
- Develop and distribute communications addressing process, policy, regulatory, and/or sponsor changes/requirements.
- Maintain IRES PD and PT data integrity, support system usage, and provide system training.
- Set-up awards in IRES and OGM.
- Maintain the GCAT boxes ensuring timely distribution of materials received.
- Maintain OSP Website.
- Provide access to external sponsor systems (FastLane, eCommons, ProposalCentral, etc.).
- Establish and implement effective business processes.
OSP: Business Operations

Staff:
- Cynthia Kane, Director
- Tracy Coston, Assistant Director
- Stephanie Marazzi, Business Analyst

Award Set up:
- Elizabeth Alcutt, Financial Assistant
- Barbara Cain, Sponsored Project Coordinator
- La’Shawn Jennings, Sponsored Project Coordinator
- Azaria McClure, Sponsored Project Coordinator
- Maggie Solsbury, Sponsored Project Coordinator
- Suzanne Trotta, Financial Assistant
- Danielle O’Brien, Sr. Administrative Assistant
- Mary-Beth Prete, Sr. Administrative Assistant
- Michelle Wilson-Jones, Sr. Administrative Assistant
- Vacant Position, Sr. Administrative Assistant
- Vacant Position, Training Manager
OSP

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