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CPRIT Grantee Annual Compliance Training

October 2020

Product Development

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Training Overview

- Introductions
- FWA Reporting
- Policy and Procedure Guide Overview
- Recent Administrative Rule Changes
- Required Reporting

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Grant Requirements Sources

- Texas Health and Safety Code Chapter 102
- Texas Administrative Code, Title 25, Chapters 701–703
- CPRIT Policies and Procedures Guide
- Uniform Grant Management Standards
- Grant Contract
- Request for Applications (RFA)
- Instructions for Applications (IFA)

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Fraud, Waste, & Abuse

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Fraud, Waste, & Abuse

How do I Make a Report?

Use Client Code #5124633190

(Users can remain anonymous)

Call	1-877-64-RedFlag (1-877-647-3335)
Online	www.RedFlagReporting.com

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Fraud, Waste, & Abuse

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Policies & Procedures Guide

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Main Sources of CPRIT Requirements

	Constitution	CPRIT's statute	CPRIT's Administrative Rules	Grant Contract	Policies & Procedures Guide
Source	Article III, Section 67 Texas Constitution (link)	Texas Health & Safety Code Chapter 102 (link)	Texas Administrative Code Chapters 701-703 (link)	Contract	P&P Guide (link)
Entity	Texas Legislature & voters	Texas Legislature	CPRIT	CPRIT	CPRIT
General frequency of changes	2007 (creation), 2019 (amendment)	Any changes must be done during a legislative session (every 2 years)	Quarterly	Periodic	Periodic

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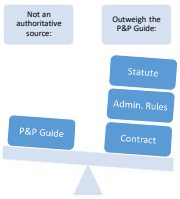
P&P Guide VS. Other Requirements

- If a conflict exists between a policy described in the P&P Guide and a state regulation, administrative rule, or contract provision, then the provisions of the applicable state regulation, administrative rule, or contract provision prevail.
- CPRIT relies on the Uniform Grant Management Standards (UGMS) when none of the above-mentioned sources provide answers.



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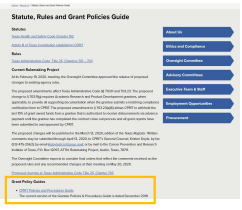
Where to find the latest P&P Guide

1. Go to https://cprit.texas.gov/
2. Click on "About Us" in the top header
3. Click on the "Statute, Rules, and Grant Policies Guide" tab on the right-hand side of the page
4. Scroll down to Grant Policy Guides section and click on "CPRIT Policies and Procedures Guide"



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Locating P&P Guide Updates

- Refer to the Version Control section at the beginning of the document.
- The Version Control section outlines which sections within the P&P Guide received updates from the previous edition.

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How to Use the P&P Guide

- Each chapter is broken up into sections with descriptive headings. For the most part, the P&P Guide is organized in a chronological order to follow the life of a grant from application to close out.
- To find specific terms within the P&P Guide:
  - Use “Ctrl + F” on a PC
  - Use “Command + F” on a Mac

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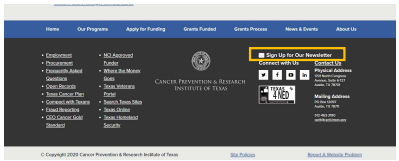
Receive Notification of Updates

Subscribe to CPRIT’s listserv (if you don’t already receive CPRIT emails) by clicking on “Sign Up for Our Newsletter” in the footer of the CPRIT website.



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Administrative Rules

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Rulemaking Process & Importance

- Since CPRIT is a state agency, it must follow the specific requirements of the Administrative Procedure Act (Tex. Gov't Code Chapter 2001) when the agency proposes either new rules or changes to existing rules.
- Many grantee requirements are found in CPRIT's administrative rules, which is why it's important for grantees to be familiar with the rulemaking process.

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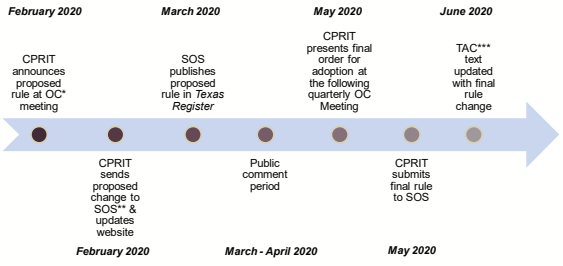
Overview of Rulemaking Timeline



*OC: Oversight Committee
**SOS: Texas Secretary of State
***TAC: Texas Administrative Code

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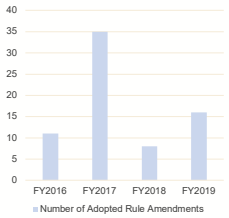
Rule Amendments by the Numbers

- During FY2016 – FY2019, CPRIT adopted **70** rule amendments (an average of 17.5 rule changes approved by the Oversight Committee per fiscal year).
- Most of these changes related to grantees.



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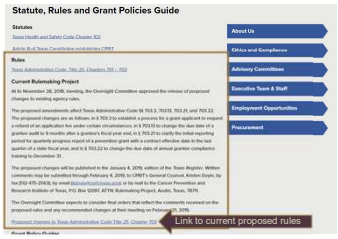
Where to find CPRIT's Administrative Rules



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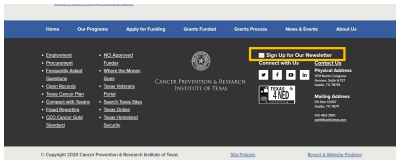

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Recent Administrative Rule Changes

1. Grantee Budget Change/Transfer Request*
2. No Cost Extension Request
3. Matching Funds Supporting Documentation
4. Advance Funds Disbursements

*Proposed at the Aug. 19, 2020 Oversight Committee meeting

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1. Grantee Budget Change/Transfer Request

- Requires that a grant recipient receive approval from CPRIT for all budget changes or transfers.
- Grantee budget change/transfer requests would still be submitted through CPRIT's Grant Management System (CGMS).
- This amendment will be considered for adoption at the November 18 Oversight Committee meeting.
- TAC § 703.25(e)

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2. No Cost Extension Request

- Allows CPRIT to review a no cost extension request by a grantee with a pending report that has been submitted to but not yet approved by CPRIT.
- In general, a grantee must be in good fiscal and programmatic standing to receive a no cost extension. To be in good fiscal and programmatic standing, all currently due grant reports must be submitted to and approved by CPRIT.
- A grantee must provide justification explaining why they should receive a no cost extension, even though the grantee has reports pending approval.
- CPRIT will review the justification and either approve or deny the no cost extension request.
- TAC § 703.14(c)

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3. Matching Funds Supporting Documentation

- A grantee that is required to expend matching funds must submit complete supporting documentation with the annual matching compliance certification form in CGMS.
- CPRIT will not review or approve a grantee's matching compliance certification form until all the supporting documentation is uploaded to CGMS.
- TAC § 703.11(g)

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4. Advance Funds Disbursements

- CPRIT will withhold the last 10% of the grant award from a grantee who receives advance funds until all contract closeout requirements have been completed and the final reports have been submitted and approved.
- A grantee may request that CPRIT withhold less than 10% of the grant award.
- TAC § 703.23(a)(6)

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Administrative Rule Changes

Q & A

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Financial Status Reports (FSR)

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FSRs - Findings & Errors

- No Justification for expenses paid in prior period that are included on current FSR
- When amounts on an invoice do not match the amount shown on the ledger, remember to indicate clearly on the invoice the amount(s) requested and which item(s) it is for.
- Reminder that we need to know which items we are reimbursing when there are multiple items on the same invoice and the grantee is only requesting part of the total invoice amount

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FSRs - Findings & Errors

- Unreadable receipts (especially travel)
- Mis-categorization of expenses - especially "Contractual" versus "Other"
- Unallowable expenses: Fees for professional memberships
- If a report or FSR is disapproved, please act on the request and resubmit as soon as possible so that the report or FSR can be approved in a timely manner - new form doesn't populate until the current one is approved, etc.

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FSRs - Findings & Errors

- Submitting ledgers with a lump sum on an item…finding, after reviewing the backup that the amount is the sum of five different invoices
- Foreign currency exchange rate sheets per the day of purchase (or inclusion of credit card statements showing rate of exchange)
- Re-emphasize the importance of timeliness, especially with FSRs around the deferral process
- Frequently documentation is not readable because of how it is scanned

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FSRs - Allowable Costs

Costs should be:

Reasonable - Section *9.4.1*

Allocable - Section *9.4.2*

Adequately documented - Section *9.4.6*

Note: CPRIT is responsible for making the final determination regarding whether an expense is an allowable expense

P&P Guide Reference:
9.4 Determining if a Cost is Allowable

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FSRs - Unallowable Costs

Examples (not an exhaustive list)

- Individual Professional Membership fees
- Alcohol
- Tips & Gratuities
- Bad debt
- Lobbying costs
- Entertainment
- When in doubt, contact your CPRIT Grant Accountant for guidance

P&P Guide Reference:
9.5 Limitation on Cost Recovery

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FSRs - Reporting

- No disbursement of grants funds will be made until all required financial and programmatic reports are **approved**
- If errors are made and adequate information is not provided, report will be disapproved and sent back for rework
- Allow enough time for ASO approval and submission **before** deadline

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FSRs - Support Documentation

- Should be in same order as amounts listed on the expenditure report
- Should include payment dates for all transactions
- Should include the following:
  - expense categories
  - itemized expenses and invoices by category
  - description of items
  - date paid
  - amount paid
  - expense totals by category

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FSRs - Support Documentation

- Uploaded **at the same time** FSR is submitted
- Include summary report of expenses (General Ledger)
- Supporting documentation must be maintained on-site

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FSRs - Support Documentation

Ledger Amount	Total Invoice Amount	Line Item Expenses	Description	For CPRIT Reimbursement
$3700	$5000	$1200	Item 1	$1200
	-	$1300	Item 2	-
	-	$2500	Item 3	$2500
Total				$3700

Identify line item expenses for reimbursement when invoices contain multiple items. The expense totals on the FSR should match the expense found in the support documentation and the ledger

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FSRs - Reporting Basics

CPRIT requires grantees to use cash basis accounting when reporting expenses to be reimbursed

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FSRs - Support Documentation

- Report only expenses **paid** during the current reporting period
  - Request for reimbursement for expenses outside of the period (OTP) should include a request and justification with the FSR
  - Payroll is an **exception** to this requirement

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FSRs - Contractual

Contractual Travel Costs	Required Support Documentation
Airfare	Itemized Amount
Mileage	Itemized Amount
Hotel	Itemized Amount
Meals	Receipts
Taxi/Uber	Receipts

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Financial Status Reports

Q & A

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FSR Travel & Support Documentation

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FSRs - Travel / Findings & Errors

- Non-itemized meal receipts
- Lack of GSA per diem rates for applicable travel expenses
- Lack of conference/seminar information that an employee is attending, i.e. actual conference dates, location without acronyms
- Failure to include of hotel folio
- Lack of invoices related to travel (meals & taxi/Uber)
- Receipts need to be legible. Unallowed expenses need to be deducted

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FSRs - Travel / Findings & Errors

- Grantees should review the travel support thoroughly for accuracy before submitting and have all support behind the travel voucher that it goes with
- Unallowed costs, illegible receipts, and calculations penciled in with no explanation provided
- Ensure that a complete and accurate expense report is included for all travel expenses including purpose of the trip
- Ensure that the itemized meal receipts are legible and identify the name of the employee claiming the meal

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FSRs - Travel / Findings & Errors

- International travel prior approval: Change Not Otherwise Specified (CNOS) must include travel dates, travel destination, estimated costs, purpose of travel and the relation of the trip and the traveler to the award scope of work
- Issues with multiple meals on one receipt
- Lack of invoices related to travel (meals & taxi/Uber)
- Receipts need to be legible. Unallowed expenses need to be deducted
- Include printout of GSA rates for meals and lodging in FSR support docs

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FSRs - Travel / Findings & Errors

- Level of Effort: Maintaining level of effort for PI/Co-PI as approved by SRC/OC to ensure adequate leadership of projects. Strong justifications for decrease will be reviewed along with CPRIT request to reduce the overall budget in ratio to % reduction
- Missing travel expense reports / purpose of travel
- PLOE needs to be accurate for each employee on the grant
- PLOEs need to be updated when FSR is submitted, not after-the-fact
- PLOE for either 0% effort or missing names from payroll and/or travel

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FSRs - Travel / Findings & Errors

- PLOE: Importance of maintaining a current list of personnel working on research projects in CGMS throughout the life cycle of an award
- MCC forms – The Enter Certification of Matching Funds Encumbered is left as zero and support documentation is not submitted
- Leaving employees off the PLOE or submitting PLOE with employees who are on the payroll, with zero percent LOE
- PLOE change requests are sometimes incomplete – you must complete all the components:
  - type of appointment
  - number of months
  - % effort
  - justification for the change

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FSRs - Travel

- A separate travel expense report should be submitted with all supporting documentation for each trip taken
- Travel expense reports **must** be approved by the employee's supervisor

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FSRs - Travel

Expense Report Components

1. Grantee Name
2. Name of person traveling
3. Date(s) of travel
4. Purpose of the travel
5. Itemization of expenses
6. Proof of payment

P&P Guide Reference:
10.4.3.1 Travel Expense Reports

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FSRs - Travel

Unallowable Travel Expenses

- Alcohol or gratuities
- Airfare costs that exceed coach class
- Foreign travel without prior CPRIT approval
- Travel outside of the grant contract effective dates
- Employee traveling not listed on Personnel Level of Effort (PLOE)
- Dates of travel occur outside of the employee's PLOE period (Travel Only Exception)

P&P Guide Reference:
10.4.3.2 Meal Expenses
10.4.1 Allowable Travel Costs

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FSRs - Travel

- Travel incidentals, meals, and lodging – identify which specific supporting documents/amounts are included in each individual amount
- International travel requires prior approval
- If splitting with another funding source, show breakdown of CPRIT portion
- Provide itemized receipts for items paid for by credit card for receipt that shows lump sum receipts
- Meal and lodging expenses incurred more than one night before state business begins are not reimbursable unless traveling to the duty point reasonably requires more than one day or the expenses are incurred to qualify for a discount airfare.

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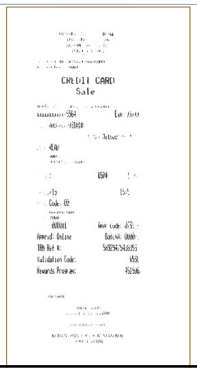
FSRs - Travel

Things to Remember

- Meal and/or credit card receipts should be legible
- Unallowable expenses need to be deducted from total



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FSRs - Travel

Please Remember

- Only one meal per receipt
- Update PLOE to cover personnel and dates of travel
- Make sure receipt totals tie to expense report total

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FSRs - Travel

- Employee must be listed on the Personnel Level of Effort (PLOE) form
- Grant funds can only be used to reimburse up to the amount of the GSA per diem rate
- An expense report should include an attachment of GSA rate printout for the travel location(s)

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FSRs - Travel

- CPRIT follows TexTravel guidelines for reimbursement of travel: https://fmx.cpa.texas.gov/fmx/travel/textravel/index.php

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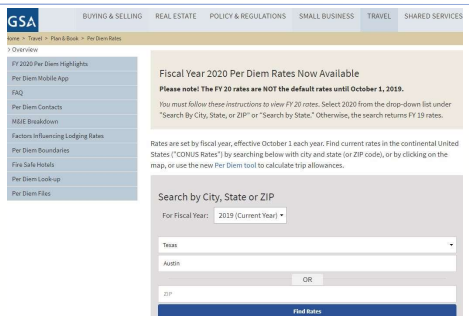
FSRs - Travel



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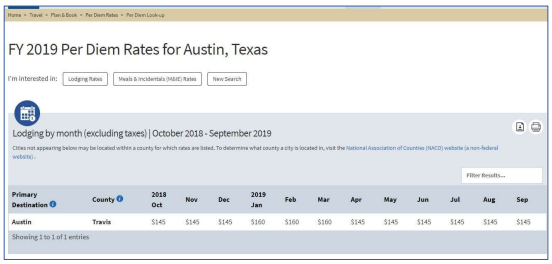
FSRs - Travel



Primary Destination	County	2018 Oct	Nov	Dec	2019 Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Austin	Travis	$145	$145	$145	$160	$160	$160	$145	$145	$145	$145	$145	$145

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FSRs - Travel

- Grantees utilizing a central travel department may provide the transactional document for airfare purchases as proof of expense (must be accompanied by an expense report)
- If per diem for meals is requested on the travel authorization, meal receipts are not required

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FSRs - Travel

- An individual may claim less than the maximum meal reimbursement rate for a duty point and use the amount of the reduction to increase the maximum lodging reimbursement rate for the duty point (per day)
- **This should be noted on the expense report**

	11/13/2018
Allowable M&IE per GSA Website	$ 61.00
Meal	$ (21.60)
Meal Per Diem Remaining	$ 39.40
Allowable Lodging Per GSA Website	$ 145.00
Meal Per Diem Remaining	$ 39.40
Allowable Room Per Diem	$ 184.40

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FSRs - Foreign Currency

- Grant Recipients should submit requests for reimbursement in United States dollar amounts
- If the original cost is in a foreign currency, the Grant Recipient must convert the cost to a dollar amount and provide documentation of the exchange rate used for the conversion.

€ = $

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FSRs - Travel

Q & A

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Financial Status Reports – Personnel / Fringe

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FSRs-Personnel/Fringe

Findings & Errors

- Missing timesheets
- Missing certification of time
- Missing payroll ledger
- Tuition payments - employee is not listed on Personnel Level of Effort (PLOE)
- PLOE not valid for current reporting period
- Missing breakdown of types of fringe

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FSRs-Personnel/Fringe

Timesheets / Records of Actual Time Worked

- Time sheets or other records of actual hours worked **must**:
  - Reflect an after-the-fact distribution of the actual time spent on each activity

P&P Guide Reference:
10.2 Personnel Expense Category

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Personnel Level of Effort (PLOE)

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PLOE

- For salary expenses show the position name, title, and level of effort on the PLOE **prior** to submitting for payment
- **Keep PLOEs current** (if end date prior to FSR period, submit new PLOE with FSR)
- Update PLOEs prior to submission of the FSR

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PLOE

Budget Summary | Details Year 1 | Details Year 2 | Personnel Level of Effort | Financial Status Reports | Payments | Other Financial Reports

Enter information for all 3 categories

Personnel Level of Effort

Senior/Key Person and Other Personnel						
First Name	Last Name	Role on Project	Level of Effort (LOE)	Year 1	Year 2	Total Person Months Per Person
		Co-investigator	Type Appt. (months)	12	12	
			Effort on Project	0.00%	2.00%	
			Person Months	0.00	0.24	0.24
		PI/PD/CR	Type Appt. (months)	12	12	
			Effort on Project	10.00%	10.00%	
			Person Months	1.20	1.20	2.40
		Senior Research Assistant	Type Appt. (months)	12	12	
			Effort on Project	50.00%	50.00%	
			Person Months	6.00	6.00	12.00
			Total Person Months Per Year	7.20	7.44	14.64

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PLOE

When grant moves to closeout status from active status (equivalent to the contract end date), the PLOE **cannot** be revised in CARS-CGMS, and any expenses related to personnel not listed on the PLOE **will not be reimbursed**

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Personnel Level of Effort Form

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No Cost Extensions (NCE)

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NCE

- No Cost Extensions- Decisions regarding NCE are based on several factors including the documentation of progress and documentation that the work proposed for the NCE is consistent with the initial award.
- CPRIT will not approve a NCE without a PI level of effort appropriate to scope of work being conducted
- If you receive a no-cost extension, you must complete a PLOE for the extension time period.
- For NCE's, the final report date changes but an additional annual report is required as well as quarterly reports until the end of the contract

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NCE

- **No Cost Extensions**
  - Include time, process and justification requirements
  - PI needs to have measurable level of effort during an approved NCE
  - In order to receive a no cost extension, a grantee must be in good fiscal and programmatic standing
  - No automatic approval of a grantee's first no cost extension request

  - Must be submitted at least **30 days prior** to contract termination but not more than 180 days prior

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NCE

For No Cost Extensions (NCEs) the **PLOE comes in as a zero by default** – make sure PLOEs are current and accurate for NCEs

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NCE

Other Personnel	Level of Effort (LOE)	Year 1	Year 2	Year 3	Year 4	Total Person Months Per Person
Role on Project						
Program Coordinator	Type Appt. (months)	0	0	12	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	**0.00**	**0.00**	**12.00**	**0.00**	12.00
Co-Program Director	Type Appt. (months)	12	12	12	12	
	Effort on Project	8.00%	8.00%	8.00%	0.00%	
	Person Months	**0.96**	**0.96**	**0.96**	**0.00**	2.88
Project Assi	Type Appt. (months)	0	0	4	12	
	Effort on Project	0.00%	0.00%	60.00%	0.00%	
	Person Months	**0.00**	**0.00**	**2.40**	**0.00**	2.40
Program Ass	Type Appt. (months)	0	12	12	12	
	Effort on Project	0.00%	0.00%	10.00%	0.00%	
	Person Months	**0.00**	**1.20**	**1.20**	**0.00**	2.40
Co-Program	Type Appt. (months)	12	12	12	12	
	Effort on Project	8.00%	8.00%	8.00%	0.00%	
	Person Months	**0.96**	**0.96**	**0.96**	**0.00**	2.88
Program Coordinator	Type Appt. (months)	0	0	4	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	**0.00**	**0.00**	**4.00**	**0.00**	4.00
Project Assistant	Type Appt. (months)	0	0	4	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	**0.00**	**0.00**	**4.00**	**0.00**	4.00
PI/PD/CR	Type Appt. (months)	12	12	12	12	
	Effort on Project	50.00%	50.00%	50.00%	0.00%	
	Person Months	**6.00**	**6.00**	**6.00**	**0.00**	18.00
Project Assistant	Type Appt. (months)	0	0	1	12	
	Effort on Project	0.00%	0.00%	100.00%	0.00%	
	Person Months	**0.00**	**0.00**	**1.00**	**0.00**	1.00
	Total Person Months Per Year	7.92	9.12	22.52	N/A	49.56

Example of a NCE which resulted in a Year 4 – automatically populates with zeros

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Matching Compliance Certification (MCC)

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MCC Supporting Documentation Changes

Effective June 10th

- Grantees should upload 100% of matching support documentation at the time the MCC form is completed and uploaded to CGMS
- MCC will not be approved until all documentation is uploaded by the Grantee and reviewed by CPRIT

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MCC

Support documentation should include

- Matching Ledger
- Invoices related to Match expenses
- Proof of payment
- Applicable bank statements

P&P Guide Reference:
6.4 Matching Fund Certification and Verification

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MCC

- If a grantee fails to expend its matching funds requirement for the year, the deficiency may be carried forward and added to the matching fund requirement for the next project year so long as:
  - the deficiency is equal to or less than 20% of the total matching funds required for the same period; and
  - the grantee has not previously had a matching funds deficiency.

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MCC

Allowable Expenses Toward Match (not exhaustive list)
• Any expense that can be claimed for grant reimbursement
• Unrecovered indirect costs up to ten percent (10%) of the grant award amount (in addition to 5% indirect costs claimed for reimbursement) DOES NOT APPLY TO ACADEMIC INSTITUTIONS
• An employee's salary amount that exceeds CPRIT's $200,000 cap
• Travel expenses that exceed the GSA per diem limit on hotel rates or meals
• Airfare costs that exceed coach class airfare
• Foreign travel related to CPRIT's funded project
• Taxes that are effectively user fees (hotel taxes, gasoline tax, or airfare tax)
• Immigration visa fees and associated costs for an employee listed on the PLOE
• Professional association fees or dues (related to the CPRIT-funded project)
• Patent application fees and associated patent application preparation costs
• Moving costs of office furnishings or employees of companies relocating to Texas
• Security systems and ongoing security system monitoring fees for physical space

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MCC

- For grantees receiving advancement of funds, the annual matching certification is based on amount of funds advanced or funds expended (**whichever is greater**).

Example #1

Funds Advanced - $1,000,000
Funds Expended - $750,000
Required Match - $500,000

Example #2

Funds Advanced - $1,000,000
Funds Expended - $1,250,000
Required Match - $625,000

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MCC

- Grantee expenditures must be direct costs spent on the CPRIT-funded project or on closely related work
- 'Closely related' is interpreted as work that supports, extends, or facilitates the CPRIT project, even if the work is not supported by CPRIT funding

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MCC

Sub-awardee Contribution Towards Match

The subcontractor's or sub-awardee's portion of otherwise allowable Matching Funds for a Project Year may not exceed the percentage of the total Grant Funds paid to the subcontractor or sub-awardee for the same Project Year

P&P Guide Reference:
6.4.2 Sources of Matching Funds

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MCC

Grant funds for the next project year will not be disbursed until the matching funds verification for the previous year and certification for the upcoming year have been approved.

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Matching Compliance Certification

Q & A

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Texas Location Criteria

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Texas Location Criteria

Must demonstrate and maintain at least 4 of the 7 criteria throughout the entire grant period.

- The U.S. headquarters is physically located in Texas
- The Chief Executive Officer resides in Texas
- A majority of the company's personnel, including at least two other C-level employees (or equivalent) reside in Texas
- Manufacturing activities take place in Texas
- At least 90% of Grant Award funds are paid to individuals and entities in Texas, including salaries and personnel costs for employees and contractors
- At least one clinical trial site in Texas
- Collaboration with a medical research organization in Texas, including a public or private institution of higher education

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Advance Funds Disbursements

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Advance Funds Disbursements

Consistent with CPRIT's administrative rule §703.23(a), which requires grantees to minimize the time between the transfer of advanced funds and payment by the grantee:

- CPRIT will advance up to 50% of the project year budget at one time.
- The grantee must be in good fiscal and programmatic standing and have **expended 90%** of the advanced funds before requesting the next advance.
- A grantee may request an advance greater than 50% of the project year budget, but the grantee must fully explain the exceptional circumstances justifying the request. It is in CPRIT's sole discretion to approve the request; in no event will CPRIT advance more than the amount budgeted for the project year.

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Advance Funds Disbursements

Advance Requests may be submitted by using the "Advancement of Funds Form" found in the "Change Requests" tab in CGMS.

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Grant Support

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Points of Contact

Technical Issues?
Contact CPRIT Helpdesk

Programmatic/ Content questions?
Contact the CPRIT Program Manager

Financial Questions/Issues?
Contact CPRIT Finance Manager/ Grant Accountant

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CPRIT Grantee Annual Compliance Training

October 2020

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