

## **Office of Sponsored Programs Roundtable Meeting**

September 15, 2011, 10 a.m., SUB A

### **Central Office Updates:**

**Affirmative Action:** Sexual Harassment Training (<http://www.montana.edu/hraa/training.html>)

All employees and some student workers are required to attend this training. The training is online and takes approximately 45 minutes. Attendance is tracked and currently only 25% of employees have completed. Contact AA if you have any questions.

**University Business Services W-9 Issues:** Based on new requirements, a W-9 must be on file for all vendors, regardless of type. This new requirement includes state and federal agencies. UBS is reviewing and cleaning up the current vendor database. Contact UBS to confirm if a W-9 is already on file before requesting.

### **Office of Sponsored Programs:**

**Issuing Subcontracts** – please see attached handout. The subcontract process is often complicated in determining what type of funding mechanism to use; a subcontract or a contracted services agreement? The handout details the significant differences and some of the potential issues were reviewed. Contact Barb at [bbunge@montana.edu](mailto:bbunge@montana.edu) for any questions regarding subcontracts.

**F&A Distribution Plan for FY '12** - the plan for the FY'12 F&A Distribution has been sent to the Deans. The process will be the same as last year with a fixed amount distributed on a monthly basis. Contact your dean or department head for any questions or Leslie at [lschmidt@montana.edu](mailto:lschmidt@montana.edu).

**F&A Tracking Procedures for Cross Departmental Awards (Revisited)** – to clarify, the F&A shared tracking procedure is designed to share 'expenditure credit' for grant activity when a PI's or grant activities occur in more than one department or organization. It doesn't mean F&As from grant expenditures will automatically be given back to a department. It means that those shared expenditures will track to the appropriate department as agreed, which may result in the department generating enough F&A's to qualify for a F&A distribution. Contact Leslie at [lschmidt@montana.edu](mailto:lschmidt@montana.edu) if you have any questions.

**Closing Purchase Orders and Encumbrances:** There is a formal system in place for closing and zeroing out a purchase order encumbrance. Purchasing will complete the Banner steps, but all staff are reminded to be sure to indicate 'Final Payment' on the BPA or PCard Routing Log. Contact Purchasing if you have any questions. The OSP Inception-to-Date report has been revised to list open encumbrances for purchase orders and contracted services. Before the grant is closed, the open encumbrances need to have a zero balance and also be closed. The encumbrances do not close automatically when the balance is zero.

**Managing Grants that Cross Departmental Lines (Access to other Orgs and P-Card Issues):**

OSP is aware of this issue, the extra work required managing these types of grants and is looking for possible solutions. We will keep you posted and any feedback, comments, suggestion on this issue should be sent to Leslie at [lschmidt@montana.edu](mailto:lschmidt@montana.edu).

**Announcements:**

- New OPAS Forms Available on VPR Website
- New F&A Rate (44% effective 7/1/12 for research)
- Fall Training in OSP (Mandatory PI held 10/17 – contact Carmen Fike in OSP)
- Reminder that Responsible Conduct of Research Training is required for NSF paid students
- Annual Time and Effort Certification Forms due back to OSP by 10/31/11
- Conflict of Interest Reporting must be completed by 10/14/11
- Equipment Fabrication form is available – contact Charles in Property Management for any questions
- For Travel Questions Regarding OSP - Contact Mary Engel (x2381)
- Next meeting Thursday, November 3, 10 a.m., SUB 233/235

# Subaward, Subcontract, Consultant, Vendor How to Tell Them Apart

## **SUBAWARD** Indicative characteristics

- Performance is measured against its portion of the scope of work of the prime grant;
- Has responsibility for programmatic decision making;
- Uses the funds to carry out a program within the organization as compared to providing goods or services for a program;
- Is responsible for adhering to applicable program compliance requirements i.e., OMB Circulars, agency regulations, etc.; and
- Subawardee's PI may be a co-author on publications or may seek patent protection for inventions.

**NOTE:** As of 10/1/2010 all subawards on Federal funds carry new FFATA reporting requirements: [http://www.whitehouse.gov/sites/default/files/omb/open/Executive\\_Compensation\\_Reporting\\_08272010.pdf](http://www.whitehouse.gov/sites/default/files/omb/open/Executive_Compensation_Reporting_08272010.pdf)

- These reporting requirements may help indicate if a project should be handled by a subaward, vendor, or consultant relationship.

**SUBCONTRACT** A term used to refer to the subagreement when the prime award is a contract. For Indicative Characteristics see Subaward.

## **VENDOR** Indicative characteristics

- Provides the goods or 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 research project, and
- Are not subject to monitoring or reporting requirements of the prime award.

## **CONSULTANT** Indicative characteristics

- A company or an individual who is clearly a bona fide consultant (expert advisor) who pursues this line of business for him/herself.
- Are paid for their time at a daily or hourly fixed rate.
- A consultant is considered a "work for hire" thus all intellectual property and copyrightable information is assigned to Montana State University.