



CANCER PREVENTION & RESEARCH
INSTITUTE OF TEXAS

CPRIT Grantee Annual Compliance Training October 2021



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Prevention

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Contact Information

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Programmatic Contact - Prevention

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 Chief Prevention Officer
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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



Red Flag Reporting
Report concerns safely, securely and anonymously 24/7.

If you are uncomfortable with a situation, Be Proactive.

Red Flag Reporting is your hotline for:

- fraudulent activity / theft,
- misconduct,
- safety concerns,
- unethical behavior.

Protect your organization and your co-workers.

Remember, every employee deserves to feel protected and safe.

Click www.RedFlagReporting.com
or
Call 1-877-64-RedFlag (1-877-647-3335)
Client Code: 5124633190

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Policies & 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

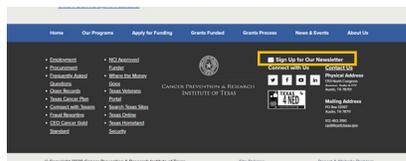


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Receive Notification of Updates



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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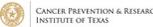
Administrative Rules



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Rulemaking Process & Importance

- As a state agency, CPRIT must follow the specific requirements of the Administrative Procedure Act (Tex. Gov't Code Chapter 2001) when the agency proposes 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

August 2020	September 2020	November 2020	December 2020
CPRIT announces proposed rule at OC* meeting	SOS publishes proposed rule in Texas Register	CPRIT presents final order for adoption at the following quarterly OC Meeting	TAC*** text updated with final rule change
CPRIT sends proposed change to SOS** & updates website	Public comment period	CPRIT submits final rule to SOS	
August 2020	September-October 2020	November 2020	

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



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Rule Amendments by the Numbers

- During FY2016 – FY2020, CPRIT adopted **74** rule amendments (an average of 14.8 rule changes approved by the Oversight Committee per fiscal year).
- Most of the rule changes related to grantees.

Fiscal Year	Number of Adopted Rule Amendments
FY2016	11
FY2017	35
FY2018	8
FY2019	16
FY2020	4

Number of Adopted Rule Amendments

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Where to find CPRIT’s Administrative Rules

- Go to <https://cprit.texas.gov/>
- Click on “About Us” in the top header
- Click on the “Statute, Rules, and Grant Policies Guide” tab on the right-hand side of the page

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Recent Administrative Rule Changes

- Reimbursement of Clinical Trial Participation Costs
- CPRIT Acknowledgement in Publications
- Minimum Level of Effort Requirements in an RFA
- Reimbursement of Professional Association Dues

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1. Reimbursement of Clinical Trial Participation Costs

- Allows CPRIT to reimburse a grantee the following costs that a cancer clinical trial participant may have associated with their participation in a clinical trial, including:
 1. transportation, including car mileage, bus fare, taxi or ride hailing fare exclusive of tips, and commercial economy class airfare within the borders of the State of Texas;
 2. lodging; and
 3. a cost reimbursed under a cancer clinical trial participation program established under Texas Health and Safety Code Chapter 50*.
- In order to be eligible for reimbursement, the expense must be included in a grantee's approved budget.
- *The Cancer Clinical Trial Participation Program is now located in [Chapter 51](#).
- [TAC § 703.26](#)



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2. CPRIT Acknowledgement

- Grantees are required to acknowledge CPRIT funding in any publication that reports information developed with CPRIT grant funds.
- The amendment requires grantees to include the CPRIT grant ID number(s) when acknowledging CPRIT funding.
- Effective date: September 1, 2021
- [TAC § 703.10](#)



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3. Minimum Level of Effort Requirements in an RFA

- CPRIT may specify the minimum level of effort, if any, of a Principal Investigator, co-Principal Investigator, or other specified key personnel must maintain for the grant project in a Request for Applications (RFA).
- [TAC § 703.3\(b\)\(4\)](#)



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4. Reimbursement of Professional Association Fees

- Professional association membership fees or dues for an individual employed by a grant recipient are not allowable for reimbursement.
- However, membership fees or dues paid by the grant recipient for the entity's membership in business, technical, and professional organizations may be an allowable expense.
- [TAC § 703.26\(e\)\(12\)](#)

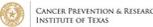


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Administrative Rule Changes

Q & A



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Financial Status Reports (FSR)

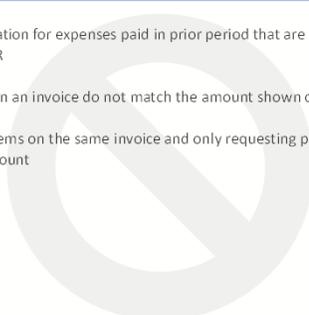


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FSRs – Findings & Errors

- No Justification for expenses paid in prior period that are included on current FSR
- Amounts on an invoice do not match the amount shown on the ledger
- Multiple items on the same invoice and only requesting part of the total invoice amount



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FSRs – Findings & Errors

- Unreadable receipts
- Mis-categorization of expenses
- Unallowable expenses



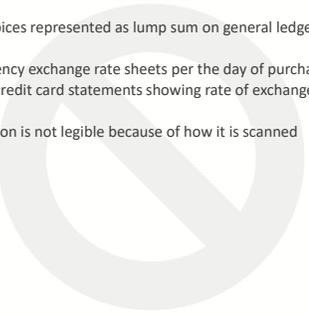
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FSRs – Findings & Errors

- Multiple invoices represented as lump sum on general ledger
- Foreign currency exchange rate sheets per the day of purchase (or inclusion of credit card statements showing rate of exchange)
- Documentation is not legible 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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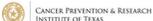
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FSRs - Unallowable Costs

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

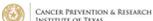


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FSRs - Reporting

- > 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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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, e.g. actual conference dates, location without acronyms
- Failure to include of hotel folio
- Lack of invoices related to travel (meals & taxi/Uber)

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FSRs - Travel / Findings & Errors

- Lack of invoices related to travel (meals & taxi/Uber)
- Receipts need to be legible. Unallowed expenses need to be deducted
- 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

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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



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FSRs - Travel / Findings & Errors

- Ensure that the itemized meal receipts are legible
- **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



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FSRs - Travel / Findings & Errors

- 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

- > 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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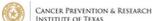
FSRs - Travel

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

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FSRs - Travel

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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 – Contractual Travel

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



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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 - 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
- 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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PLOE - Findings & Errors

- PLOE: Maintaining a current list of personnel working on projects in CGMS throughout the life cycle of an award
- Leaving employees off the PLOE or submitting PLOE with employees who are on the payroll, with zero percent level of effort
- PLOE change requests are submitted incomplete – you must complete all the components:
 - type of appointment
 - number of months
 - % effort
 - justification for the change

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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



Section/Key Person and Other Personnel		Level of Effort (LOE)		Year 1	Year 2	Total Person Months Per Person
First Name	Last Name	Role on Project	Type Appl. (months)			
		Co-leadgator	Effort on Project	0.00%	2.00%	
			Person Months	6.00	6.00	12.00
		PIPEDCR	Effort on Project	10.00%	10.00%	
			Person Months	1.20	1.20	2.40
		Senior Research Assistant	Effort on Project	10.00%	10.00%	
			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

Q & A



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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) where the grantee is requesting more than a 6 month NCE, the justification should include the increased number of months in the first sentence.

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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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Grant Support



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Points of Contact

CARS/CGMS Technical Issues?
 Contact CPRIT Helpdesk
 Email: Help@CPRITGrants.org
 Phone: 866-941-7146

Programmatic/ Content questions?
 Contact the CPRIT Program Manager/Officer

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



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Contact Information

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CPRIT Grantee
Annual Compliance Training
October 2021

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