# Financial Management of Your GLS Grant

Louis Velasco
Grants Management Specialist
Substance Abuse and Mental Health Services Administration
U.S. Department of Health and Human Services

GLS Suicide Prevention Grantee Meeting Renaissance Hotel Washington, DC March 20, 2018



## Disclaimer

• Disclaimer: The views, policies, and opinions expressed in written conference materials or publication and by speakers and moderators do not necessarily reflect the views, opinions, or policies of SAMHSA or HHS; nor does mention of trade names, commercial practices, or organizations imply endorsement by the U.S. Government.



# **Topics**

1. eRA Commons

2. Post-Award Changes Requiring Prior Approval

3. Financial Reporting Requirements

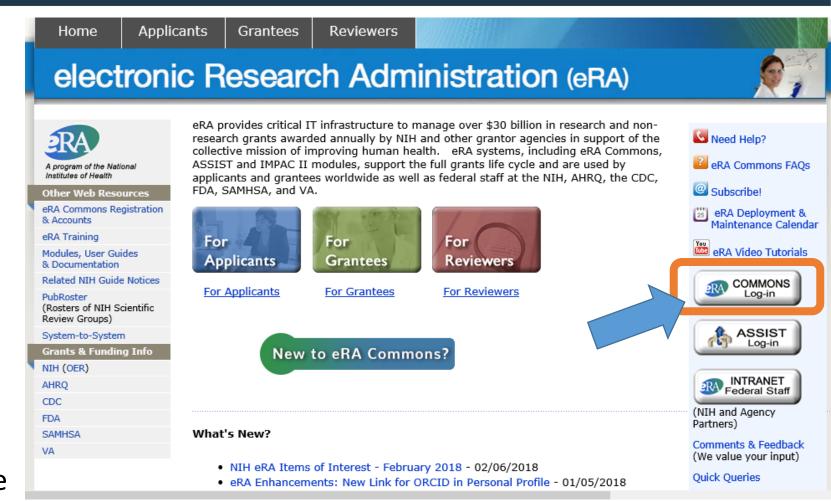
4. Carryovers

5. Preparing Your Budget



## eRA Commons: Homepage

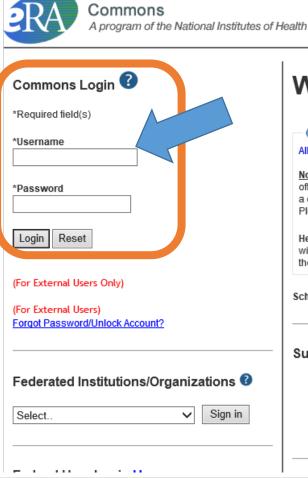
- All post-award requests will now be processed exclusively through the eRA Commons system and will no longer be accepted through email. You must have an eRA Commons account to submit your request.
- https://era.nih.gov/
- To reach the log-in screen, click on "Commons Log-In" on the right side of the eRA home page.





## eRA Commons: Log-In

• Log-in to eRA Commons with your credentials to access your organization's grant portfolio.



## Welcome to the Commons

- 🕕 System Notification Message

All systems are currently available.

Note: When application and grant reporting submission delays occur because the applicant or recipient organization is officially closed due to a natural disaster or other emergency, the NIH will consider accepting late applications and reports, on a case-by-case basis.

Please reference notice NOT-OD-17-106 in the NIH Guide for Grants and Contracts for additional details.

Heads up! eRA is continuing to identify possible duplicate accounts for Commons users. Over the next few months emails will be sent to account holders that have been identified as likely having more than one account in Commons. Please see the Nexus article for more information.

Scheduled Commons Maintenance: For maintenance information, see the eRA Scheduled Maintenance Calendar

### Support Related Resources

- Electronic Submission: Learn about the most frequent application errors at Avoiding Common Errors
- Electronic Application Submission: To learn about completing and submitting an electronic application and access helpful resources, visit the Applying Electronically website.
- eRA Home Page: To find Commons FAQs, <u>User Guides</u>, training materials, and step-by-step instructions for performing tasks in Commons, visit the eRA website.





#### Register Grantee Organization

#### About the Commons

- Frequently Asked Questions
- Latest Release Notes

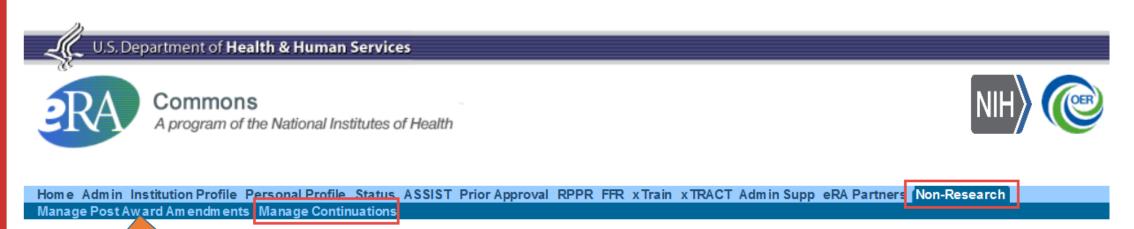
#### Additional Links

- RePORT
- Grants.gov
- <u>iEdison</u>
- · National Institutes of Health
- Public Access Policy Page
- Loan Repayment Program
- Commons Quick Queries



## eRA Commons

• Click on "Non-Research" tab and either "Manage Post Award Amendments" or "Manage Continuations"



Welcome to the Commons

To connect to the OFFICIAL PRODUCTION version of the NIH Commons, use this URL: https://www.google.com

#### Welcome

James Kirk **ID:** kirkj

**Institution:** Starfleet Academy

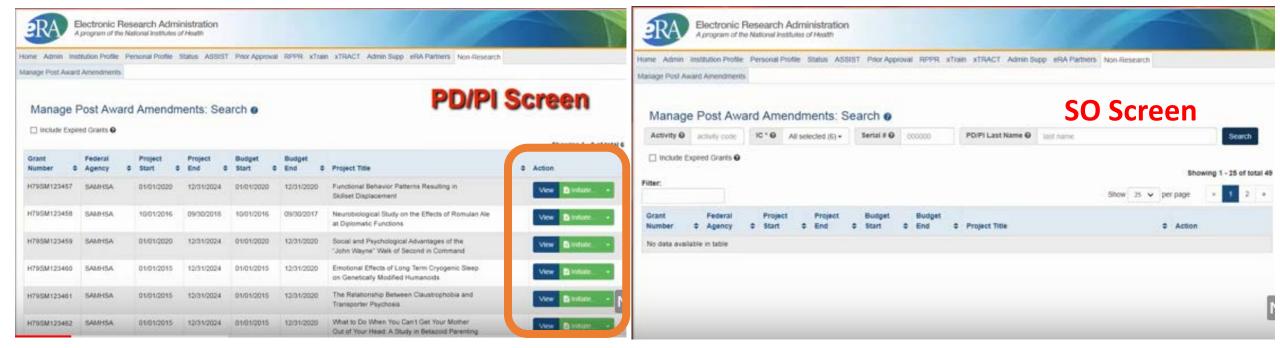
Roles: SO FSR

### System Information Message

<u>Note:</u> It has come to our attention that users are unable to access reports. We are working diligently to address this issue. We apologize for any inconvenience this may cause.



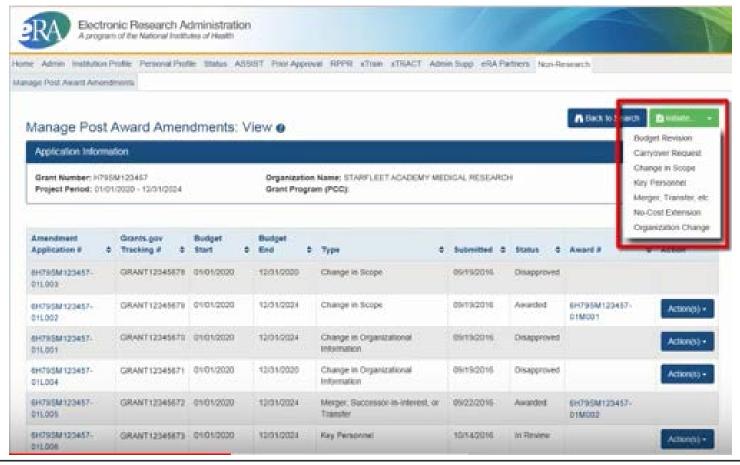
- Default "Manage Post Award Amendments" screens will differ for PD/PI role or SO role
- Under Action column:
  - > "View" will take you to current Post Award Amendment Requests status screen
  - > "Initiate" will begin the process of submitting a new Post Award Amendment Request





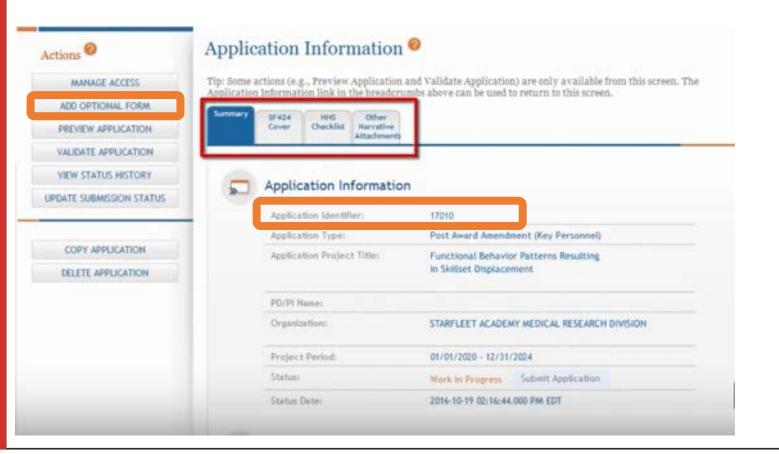
 On Post Award Amendments status screen you will see different rows for all requests submitted

A new Post Award Amendment can also be initiated on this screen





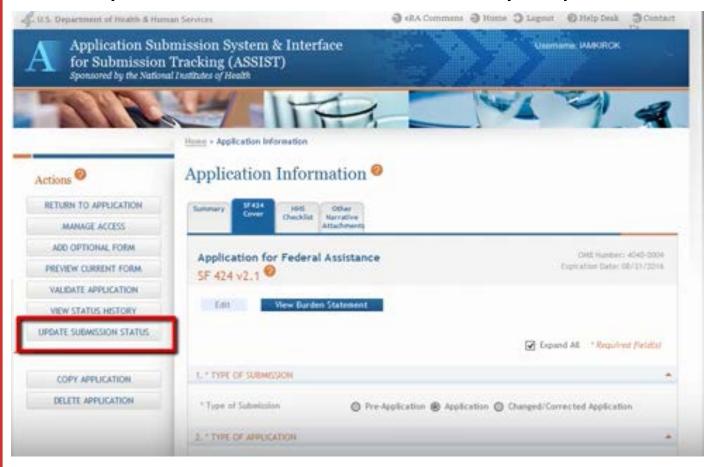
- When initiating a Post Award Amendment, you will be taken to the ASSIST system
- Application Identifier number is automatically generated in ASSIST for each Post Award Amendment request and can be used to search for a particular action

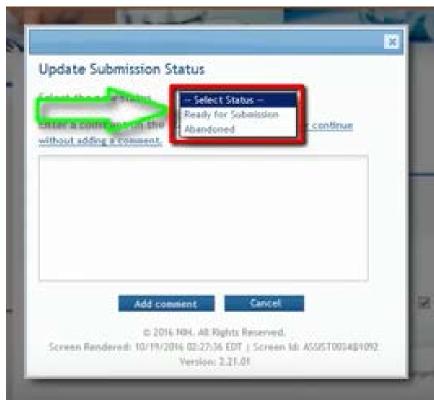


- Each post award amendment type has different required tabs, with the SF-424 Cover and HHS Checklist always being required
- Click "Add Optional Form" on the left side to upload Other Narrative Attachments to a Post Award Amendment request



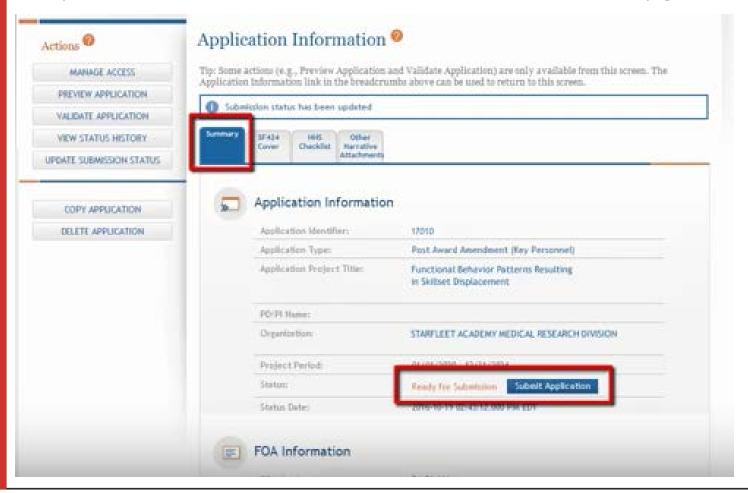
- When all forms have been completed and you are ready to submit, click "Update Submission Status" and "Ready for Submission"
- The system will indicate whether any required information is missing







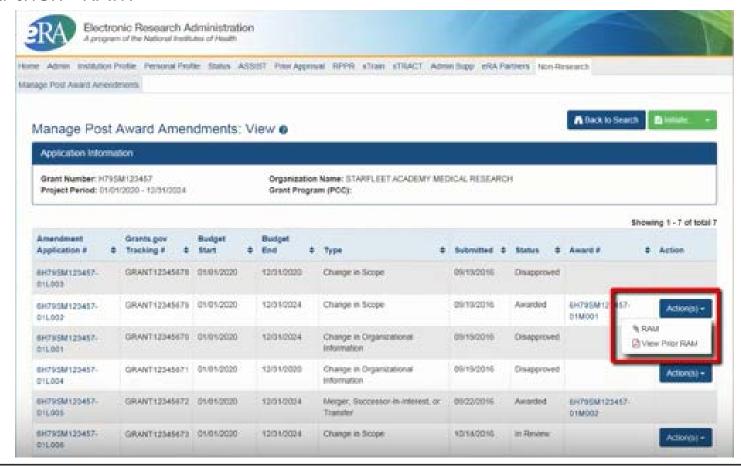
- To complete submission, an individual with AOR credentials will have to log-in and click "Submit Application" under the "Summary" tab of a particular post-award amendment request in ASSIST
- Upon submission, confirmation email will be received by grantee and GPO/GMS





# eRA Commons: Request for Additional Materials

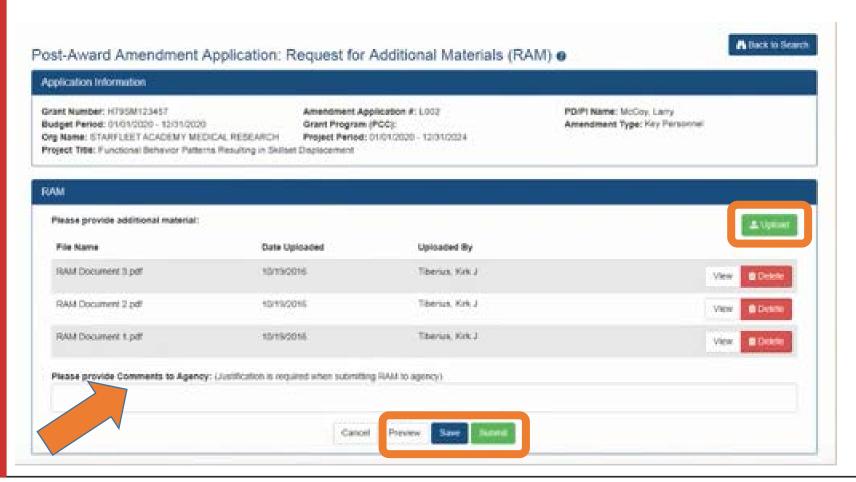
- GPO/GMS may Request Additional Materials (RAM) within eRA Commons if needed. Grantee will receive an eRA Commons notification.
- To access RAM, grantee will go to "Manage Post Award Amendments" in eRA Commons and click on "Action" and then "RAM"





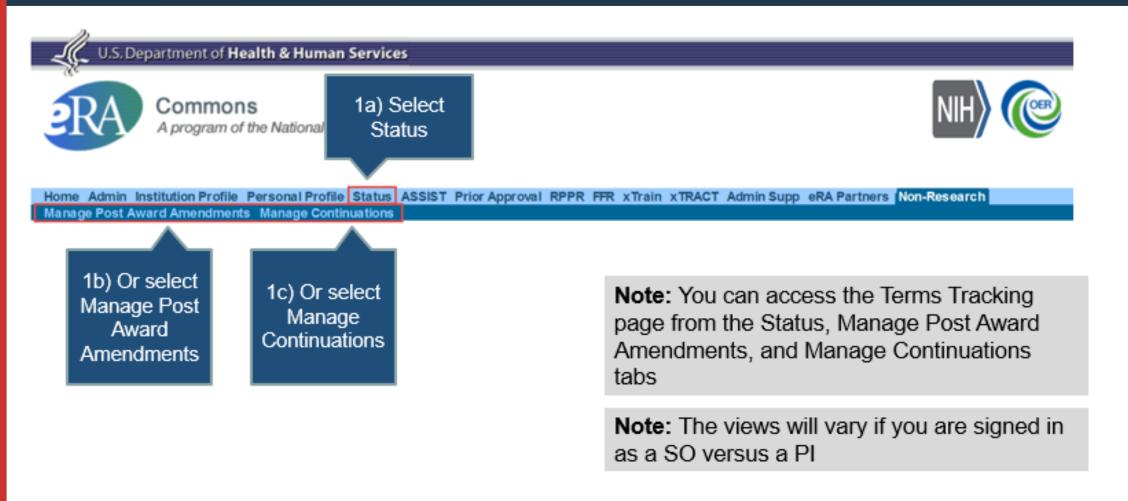
# eRA Commons: Request for Additional Materials

- Click "Upload" and add up to 10 PDF attachments needed to respond to the RAM. PDF is the only file type supported, no Word documents or Excel spreadsheets, etc.
- It is required to enter "Comments" when responding to a RAM



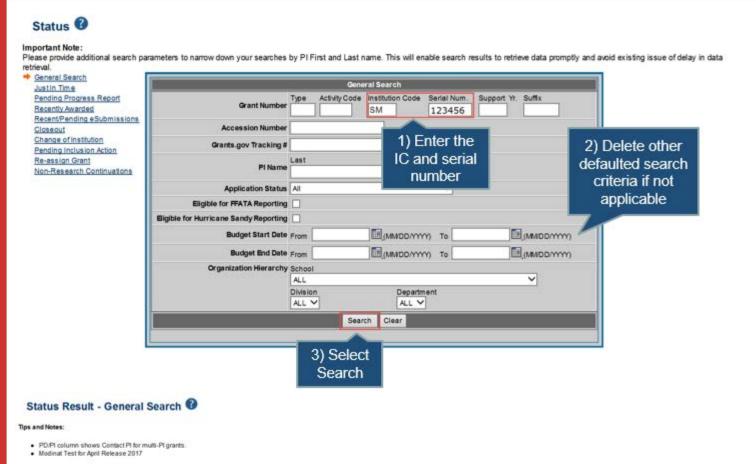
- Click "Preview" to view message GPO/GMS will receive
- Click "Save" to return to eRA Commons later and complete
- Click "Submit" to ultimately finish response to RAM





 <u>Special Conditions/Terms Examples:</u> Programmatic, Revised Budget, SAM.gov Exclusion, Federal Debt, Disparity Impact, Other, etc.





 Option 1a: Access Special Conditions via Status in the SO Role





#### Status: PI Search

The Status screens have been updated. If you have any questions about the new Commons Status look and feel please contact the eRA Service Desk.

The following list of applications represents a result of the search by Grants.gov Tracking # or a list of all Recent/Pending eSubmissions. If you do not see a complete list of your Recent/Pending eSubmissions, please click Recent/Pending eSubmissions menu tab again.



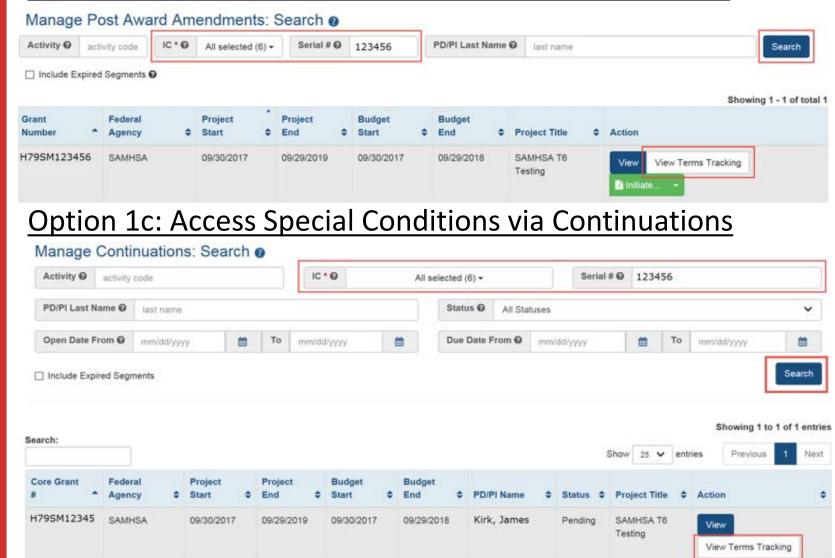
 Option 1a: Access Special Conditions via Status in the PI/PD Role

Select
 View Terms
 Tracking



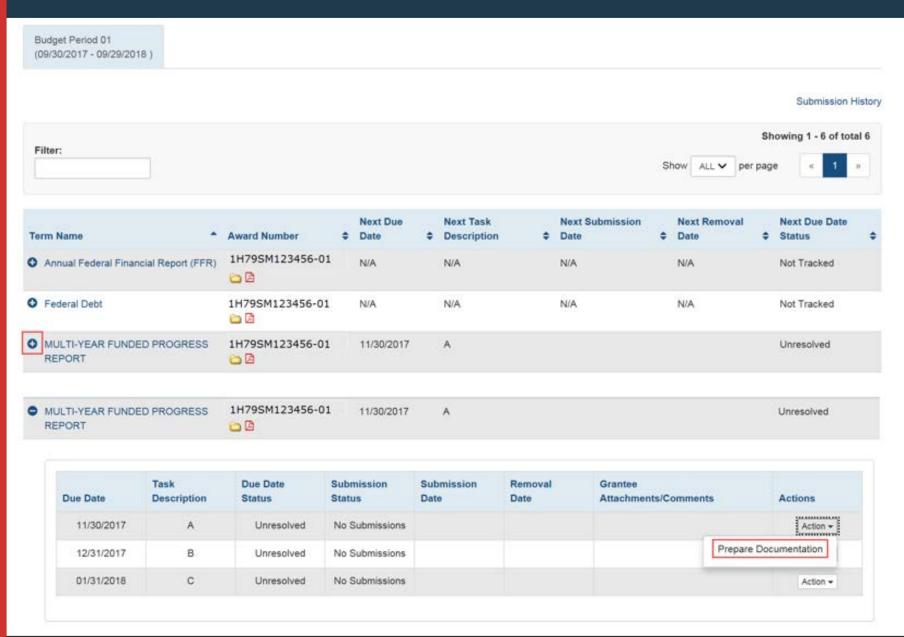


## Option 1b: Access Special Conditions via Amendments



- SO role view will have to search for the specific grant number
- PI/PD role view will have any grants associated with an individual appear
- Select "View Terms
   Tracking" once correct
   grant is identified





 Each special condition will have its own row.
 Click on the special condition row "+" to expand it and prepare documentation.



### Terms and Conditions (Additional Materials) @



 Similar to RAM response, "Upload" up to 10 PDF attachments and submit when ready



 Submission status and date will update once it transmits

Due Date	Task Description	Due Date Status	Submission Status	Submission Date	Removal Date	Grantee Attachments/Comments	Actions
11/30/2017	A	Unresolved	Submitted	11/03/2017		Grantee Submission 1.pdf Grantee Submission 2.pdf Grantee Submission 3.pdf Here are my materials for con	Action -
12/31/2017	В	Unresolved	No Submissions				Action →
01/31/2018	С	Unresolved	No Submissions				Action +

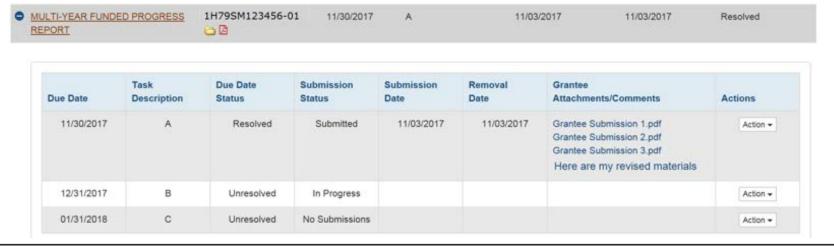
 Consolidated submission package can be viewed at "View Submission"



 If GPO/GMS request additional information, status would show as Unresolved and grantee would click on "Revise Documentation" to address



 If GPO/GMS accept the response status would show as Resolved, a date would be reflected in Removal Date, and a revised Notice of Award would be issued





## **Post-Award Actions**

 Include any activity that takes place after the award is made to implement the award supported project

 Some of these changes require explicit prior approval in the form of a revised Notice of Award (NoA) before being implemented

Submit via eRA Commons

 https://www.samhsa.gov/grants/grants-management/post-awardchanges



## **Common Post-Award Actions**

## 1. Key Staff and Level of Effort Changes

https://www.samhsa.gov/grants/grants-management/post-award-changes/key-staff-level-effort

### 2. Budget Revisions

https://www.samhsa.gov/grants/grants-management/post-award-changes/budget-revisions

## 3. Changes in Scope

https://www.samhsa.gov/grants/grants-management/post-award-changes/change-scope

## 4. Carryover Requests

https://www.samhsa.gov/grants/grants-management/post-award-changes/carryover-requests



# Key Staff and Level of Effort Changes

## • SM-14-008 & SM-15-004 GLS FOAs:

"Seek SAMHSA approval for key positions to be filled. Key positions include, but are not limited to, project director and evaluation director."

## Continuation Notice of Award:

Key staff are listed below:

Mickey Mouse, Project Director @ 100% level of effort

Donald Duck, Project Evaluator @ 50% level of effort

Any changes in key staff including level of effort involving separation from the project for more than three months or a 25 percent reduction in time dedicated to the project, requires prior approval.



# **Determining Level of Effort Changes**

Calculating Level of Effort Change:

Level of effort % X 0.25 = Threshold to determine whether prior approval is required

- Mickey Mouse, Project Director @ 100% level of effort
   100% X 0.25 = 25% threshold
- Donald Duck, Project Evaluator @ 50% level of effort
   50% X 0.25 = 12.5% threshold



# Key Staff Change and Level of Effort Request

## <u>Grantee Should Submit the Following Via eRA Commons:</u>

- 1. Request Letter
  - Support the need to change the key personnel and/or the LOE dedicated to the project
  - Annual salary and LOE percentage
  - Description of any proposed duties or responsibilities that have changed and why
  - Any impact the change will have on the budget and scope for the approved project
- 2. CV/Resume/biographical sketches for new personnel
- 3. HHS/SAMHSA Checklist (Form HHS-5161-1)
- 4. Proposed PD's eRA Commons ID

AMENDMENT_TYPE_CODE	REQUIRED_FORM_NAME
Change in Key Personnel	SF424
	OtherNarrativeAttachments
	HHS_CheckList

Required attachments/tabs within eRA Commons for a Key Staff/Personnel change



# **Budget Revisions**

<u>Budget Revision:</u> An action resulting in the reallocation of funds within and between approved budget cost categories.

<u>Significant Funds Reallocation</u>: Cost modifications that exceed 25% of the total approved budget, <u>or</u> \$250,000, <u>whichever is less</u>.

## **Cases Always Requiring Prior Approval:**

- Recipients classified as "Restricted Status"
- Reallocation of funds to a budget category initially funded at "\$0"
- Purchase of a unit of general purpose or special purpose equipment exceeding \$25,000
- Changes in applicant cost sharing or matching



# **Budget Revision Example**

	Approved Continuation Year Budget	Proposed Budget Revision	<u>Change, +/-</u>
Personnel	140,000	105,000	- 35,000
Fringe Benefits	42,000	35,000	- 7,000
Travel	17,500	21,000	+ 3,500
Equipment	0	42,000	+ 42,000
Supplies	17,500	10,500	- 7,000
Contractual	210,000	262,500	+ 52,500
Other	133,000	84,000	- 49,000
Direct Charges	560,000	560,000	-
Indirect Charges	140,000	140,000	-
TOTAL	700,000	700,000	Δ 196,000

Equipment category previously funded at \$0. And if \$42,000 involves an item over \$25,000.

Budget revisions are 28% = \$196,000 / \$700,000. This exceeds the 25% threshold.



# **Budget Revision Request**

### <u>Grantee Should Submit the Following Via eRA Commons:</u>

- 1. Cover letter/narrative with detailed explanation of what costs are being rebudgeted and assurance these changes do not involve a change in scope
- 2. Revised SF-424A Budget Information Form
- 3. Revised Detailed Line-Item Budget and Narrative Justification
- 4. If applicable, an updated indirect cost rate agreement
- 5. HHS/SAMHSA Checklist (Form HHS-5161-1)

AMENDMENT_TYPE_CODE	REQUIRED_FORM_NAME
Budget Revision	SF424
	SF424A
	Budget
	Project
	OtherNarrativeAttachments
	HHS_CheckList

Required attachments/tabs within eRA Commons for a Budget Revision



# Changes in Scope

A significant change in the scope or objectives of the federally supported project activities identified and approved in the originally funded application.

## Common Factors Indicating Changes in Scope

- Change in Goals, Objectives, Aims, or Purposes
- Change in Service Area
- Eliminating a Care Delivery Site
- Transfer of the performance of substantive programmatic work to a third party (contractor or sub-recipient)



# Change in Scope Request

## <u>Grantee Should Submit the Following Via eRA Commons:</u>

- 1. Cover letter/narrative explaining the change in scope, including:
  - A detailed discussion of any potential impact on the total approved project budget, and to accomplishing the aims and objectives of the funded project.
  - An explanation and documentation of any unique circumstances that will impact the ability to meet the expectations of the funded project.
- 2. Revised SF-424A Budget Information Form
- 3. Revised Detailed Line-Item Budget and Narrative Justification
- 4. HHS/SAMHSA Checklist (Form HHS-5161-1)

AMENDMENT_TYPE_CODE	REQUIRED_FORM_NAME
Change in Scope	SF424
	SF424A
	Budget
	Project
	OtherNarrativeAttachments
	HHS_CheckList

Required attachments/tabs within eRA Commons for a Scope Change



## **Carryover Requests**

- Grantees can carry over an unobligated balance (UOB) to the current budget period from previous years
- Two types of carryover:
  - 1) Intent: 10% or less
  - 2) Formal: greater than 10%
- Only one type of carryover (intent or formal) can be submitted per budget period



# **Determining Type of Carryover**

Calculating Percentage of Carryover:

Current year award amount X 10% = Threshold to determine whether carryover is considered Intent or Formal

- Year 2 award amount \$700,000 X 10% = \$70,000
  - -Intent: \$70,000 or less
  - Formal: Greater than \$70,000



# **Carryover Requests**

SAMHSA must have a current FFR report on file

Restricted funds cannot be used for carryover

Grantees on restricted status cannot use intent to carryover



## Carryover Requests: Intent 10% or Less

 SAMHSA grantees can carryover without prior approval an UOB of 10% or less than the Authorized Award Amount for the current year

 The only action required by the grantee is to state the intention to carry over funds and the intent amount in the remarks section of the FFR (line 12)



# Carryover Requests: Formal Greater Than 10%

 SAMHSA grantees must obtain prior approval for a formal carryover, which is defined as more than 10% of the Authorized Award Amount for the current year



## Carryover Requests: Formal Greater Than 10%

## **Grantee Should Submit the Following Via eRA Commons:**

- 1. Cover letter/narrative
  - Why the balance of funds have not been expended
  - How not spending the balance of funds affects the execution of grant activities and attainment of grant objectives
  - How the funds will be used to fulfill an unmet need(s) and/or one-time cost(s)
- 2. Budget
  - The current budget period award amount as it was originally approved
  - The requested carryover amount
  - The new total budget, including the requested carryover amount
- 3. SF-424A
- 4. HHS/SAMHSA Checklist (Form HHS-5161-1)

Required attachments/tabs within eRA Commons for a Carryover Request

AMENDMENT_TYPE_CODE	REQUIRED_FORM_NAME
Carryover Request	SF424
	SF424A
	Budget
	Project
	OtherNarrativeAttachments
	HHS_CheckList



#### Carryover Requests: Restrictions

- Carryover funds cannot be used for the following purposes:
  - 1) To replace current public or private funding
  - 2) To supplant ongoing activities
  - 3) To purchase or improve land, or any building
  - 4) To reimburse pre-award costs
  - 5) Pay an individual's salary at over 100% level of effort (including current year + carryover)
  - 6) Carryover funds can cover only prospective costs, not costs already incurred by the recipient



#### Formal Carryover Example

- Year 3 award amount: \$313,388
- Unobligated balance reported on Year 2 FFR: \$100,000
- Formal carryover request: amount greater than \$31,338

Award Calculation (U.S. Dollars)	
Salaries and Wages	\$210,474
Fringe B enefits	\$87,772
Personnel Costs (Subtotal)	\$298,246
Supplies	\$500
Consortium/Contractual Cost	\$12,924
Travel Costs	\$7,080
Other	\$15,400
Direct Cost	\$334,150
Indirect Cost	\$26,732
Approved Budget	\$360,882
Federal Share	\$360,882
Less U nobligated Balance	\$47,494
Cumulative Prior Awards for this Budget Period	\$313,388

SUMMARY TOTALS FOR ALL YEARS				
YR	AMOUNT			
3	\$313,388			

AMOUNT OF THIS ACTION (FEDERAL SHARE)

#### REMARKS:

This award approves the carryover of an unobligated balance in the amount of \$47,494 from previous budget years to Year 3. A carryover request was originally submitted in the amount of \$47,800. However, the indirect costs were miscalculated and should have been \$43,976 X 8% = \$3,518, a reduction of \$306. If the final resolution of the audit covering the above stated budget period(s) determines that the unobligated balance of funds is incorrect, SAMHSA will not make additional funds available to cover any shortfall.

Please note that the contact name corresponding to the Government Project Officer has changed.

All previous terms and conditions remain in effect until specifically approved and removed by the Grants Management Officer.

All responses to special terms and conditions of award and post award requests may be electronically mailed to the Grants Management Specialist and to the Program Official as identified on your Notice of Award.

It is essential that the Grant Number be included in the SUBJECT line of the email.



# Financial Reporting Requirements

1) Federal Financial Report (FFR)/SF-425

https://www.samhsa.gov/grants/grantsmanagement/reporting-requirements

2) Financial Cash Transaction Report (FCTR)

https://pms.psc.gov/grant\_recipients/ffrinformation.html



#### Federal Financial Report (FFR)/SF-425

				_
6. Report Type	7. Basis of Accounting	8. Project/Grant Period	9. Reporting Period	End Date
Quarterly	Cash	From: To:		
Semi-Annual	Accrual			
Annual Annual				
Final			<u> </u>	
10. Transactions				Oumulative
(Use lines a-c for single				
Federal Cash (To repor				
a. Cash Receipts		0.00		
b . Cash Disbursements				0.00
c. Cash on Hand (line a		0.00		
(Use lines d-o for single				
Federal Expenditures a	and Unobligated Balance:			
d . Total Federal funds au		0.00		
e . Federal share of expe		0.00		
f. Federal share of unliqu		0.00		
g . Total Federal share (s		0.00		
h . Unobligated balance o		0.00		
Recipient Share:				
i. Total recipient share re		0.00		
j. Recipient share of expenditures				0.00
k. Remaining recipient share to be provided (line i minus j)				0.00
Program Income:				
I. Total Federal program income earned				0.00
m. Program Income expended in accordance with the deduction alternative				0.00
n . Program Income expended in a coordance with the addition alternative				0.00
o . Unexpended program		0.00		

- Always report on a cumulative basis
- Annual FFRs due 90
   days after the end of a
   budget period 12/31/2018 due to
   the current budget
   period end date being
   9/29/2018



#### Federal Financial Report (FFR)/SF-425

- When used in connection with a non-Federal entity's utilization of funds under a
  Federal award, <u>obligations</u> means orders placed for property and services,
  contracts and sub-awards made, and similar transactions during a given period
  that require payment by the non-Federal entity during the same or a future
  period.
- <u>Line 10f</u> -- <u>Unliquidated</u> obligations means, for financial reports prepared on a cash basis, obligations incurred by the non-Federal entity that have not been paid (liquidated). For reports prepared on an accrual expenditure basis, these are obligations incurred by the non-Federal entity for which an expenditure has not been recorded.
- <u>Line 10h</u> -- <u>Unobligated</u> balance means the amount of funds under a Federal award that the non-Federal entity has not obligated.



# Financial Cash Transaction Report (FCTR)

- Reported to Payment Management System
- Reporting Frequency 30 days after the end of the calendar quarter (January 30, April 30, July 30, October 30)

 If the report is not submitted on or before the due date, funds may be restricted automatically in PMS



- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (CFR Title 45, Subtitle A, Subchapter A, Part 75): <a href="https://www.ecfr.gov/cgi-bin/text-idx?node=pt45.1.75&rgn=div5">https://www.ecfr.gov/cgi-bin/text-idx?node=pt45.1.75&rgn=div5</a>
  - ➤ Subpart E, Cost Principles is a guide on the allowability/unallowability of certain items of cost
- Provide as detailed and broken down of a budget as possible
- Most common SAMHSA Funding Restrictions (see FOA for more details):
  - ➤ Light snacks: \$3/person
  - ➤Incentives: \$30/person (non-cash to help with attainment of program goals and cash or equivalent to encourage participation in data collection follow-up)

- Personnel or Contractual/Consultant Budget Costs:
  - For individuals on salary, provide annual salary/level of effort/amount being charged to the grant
  - For individuals on hourly rate, provide the number of hours/hourly rate/amount being charged to the grant
- Travel Costs:
  - ➤ For flights consult GSA City Pairs Program:
    <a href="https://cpsearch.fas.gsa.gov/cpsearch/search.do?method=enter">https://cpsearch.fas.gsa.gov/cpsearch/search.do?method=enter</a>
  - For hotel rates and per diem consult GSA established per diem rates: <a href="https://www.gsa.gov/travel/plan-book/per-diem-rates">https://www.gsa.gov/travel/plan-book/per-diem-rates</a>
  - For mileage reimbursement rates consult the IRS rate, 54.5 cents for 2018 and 53.5 cents for 2017
  - ➤ Budget for grantee meeting according to FOA guidance



- Equipment: Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000.
- Supplies: All tangible personal property other than those described in Equipment.
- Contractual Costs: Detailed, broken down budgets should be provided for all sub-awards



- Equipment: Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000.
- Supplies: All tangible personal property other than those described in Equipment.
- Contractual Costs: Detailed, broken down budgets should be provided for all sub-awards



#### Indirect Costs:

- ➤ Provide updated indirect cost rate agreements
- ➤ Pay attention to direct cost base language definition when budgeting indirect costs. This determines the maximum allowable budgeted indirect costs. Varies from organization to organization. Common direct cost base language includes:
  - □Only include personnel costs
  - □ Exclude all sub-awards or the portion over \$25,000 for each sub-award
  - ☐ Exclude equipment



	Approved Budget
Personnel	105,000
Fringe Benefits	35,000
Travel	21,000
Equipment	42,000
Supplies	10,500
Contractual	262,500
Other	84,000
Direct Charges	560,000
Indirect Charges	140,000
TOTAL	700,000

- IDC rate is 25% in this example
- Direct cost base language examples:
  - ➤ All direct costs: \$560,000 X 25% = **\$140,000**
  - ➤Only include personnel costs: \$105,000 X 25% = **\$26,250**
  - Exclude all sub-awards or the portion over \$25,000 for each sub-award: Contractual category includes four sub-awards at \$65,625 each (\$262,500).  $$297,500 + $100,000 = $397,500 \times 25\% = $99,375$
  - Exclude equipment: \$560,000 \$42,000 = \$518,000 X 25% = **\$129,500**



#### **Expected Upcoming Dates/Deadlines**

- Carryover NoAs Released: late April-May 2018
- Continuation NoAs Released: late June-early July 2018
- PPHF Funded Recipients: next semi-annual report due 7/15/2018
- Next Annual FFR Due Date: 12/31/2018

