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Hot Topics in HSC Contract and Grant Administration

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# Agenda

Minimum Wage on Federal Contracts

FSLA – NIH Postdoctoral NRSA Stipends

Overtime on Federal/Restricted Awards

Uniform Guidance – Procurement Update

Chrome River PI Approval

ABS Process Review



## Federal Contact and Sub Contracts – Minimum Wage Increase Executive Order 13658

- Effective January 1, 2015
- Applies to new contracts and replacements for expiring contracts with the Federal Government
- Minimum wage will be increased to \$10.10 for 2015, \$10.15 for 2016



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## FSLA – NIH Postdoctoral NRSA Stipends

- NIH will increase postdoctoral NRSA stipends to levels at or above the new threshold.

<https://nexus.od.nih.gov/all/2016/05/18/nih-flsa-2016/>



## Overtime on Federal and Restricted Awards

- Frequently Asked Question – Is this allowable?
  - Depends on the Funding Source
  - Generally it can be allowable, but several considerations need to be evaluated prior. Some awards require it be disclosed in grant application or prior approved in writing by sponsor. Other limitations exist based on employee position/title, institutional personnel policies, union contracts, etc.



## Overtime on Federal and Restricted Awards

- What guidance is available to assist in allowability analysis?
  - Uniform Guidance (§200.430 Compensation—Personal Services)
    - Consideration – Faculty vs Non-faculty professional personnel
  - NIH Grants Policy Guidance (7.9 Allowability of Costs/Activities)
    - Premiums for overtime generally are allowable; however, such payments are not allowable for faculty members at institutions of higher education. If overtime premiums are allowable, the categories or classifications of employees eligible to receive overtime premiums should be determined according to the formally established policies of the organization consistently applied regardless of the source of funds.



## Overtime on Federal and Restricted Awards

- Additional considerations:
  - **If a cost cannot meet the criteria of reasonableness, allowability, allocability, and consistency it is not allowable.**
  - Grant Budget should be considered prior to approving.



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## Uniform Guidance Update

- 2 CFR 200.317-326, Procurement Standards.
  - Extension of the grace period to FY 2018 (Fiscal year starting July 1, 2017 effective date)



# Chrome River PI Approval

- Policy 4030 – Travel
- Approval of Reimbursement Requests:
  - Dean, Director, Department Head or PI can delegate their authority to a person within the department with appropriate authority, such as department administrator or financial manager.



# Chrome River PI Approval

- Approver's Criteria and Responsibility
  - Fiscal Review
    - Correct Index review
    - Budget Availability
    - Account code review
  - Business Operations Review
    - Expense follows University Policy
    - Expense follows Internal Department Policy
    - If restrictions, expense is allowable by Grant, Contract, or Donor Designation
  - For Restricted expenses, if not the PI, must approve the expense reimbursement as the PI designee
- Department Org Approver (Required)
  - If the ORG Approver can fulfill all fiscal, and operational responsibilities above, then "Department Choice" Approver is not necessary.
- Department Choice Approver (Optional)
  - If fiscal and operational responsibilities are split, use the Department Choice Approver to accomplish all responsibilities



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## Award Budget Sheet (ABS) Process Update

- HSC Contract and Grant Accounting – Fiscal Monitor will be working with departments to obtain completed ABS
- Previous process – Sponsored Projects Office/Preaward



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# Questions

