Research Management Council

October 2014

Presented by – Sponsored Projects Accounting
UG Webcast

- Presented by COFAR on 10/2/14
- Recorded version promised by not available, yet
- OMB, IHE, OIG, Non-profits and KPMG
- Should means should
- Procurement requirements are new and different
WUSTL Implementation

• Steering Committee meeting on 10/10/14
  – Project structure approved
  – UG issue summary
  – Task Force Updates

• Proposing Admin & Clerical Salaries
  – RNews sent on 10/17/14
  – Specifically identified and “integral” to project
  – Explicitly included in the budget
COGR Activity

• MTDC Letter (10/26/14)

“MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first $25,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward and subcontract in excess of $25,000... “
COGR Activity, cont.

- Technical Corrections Letter (10/9/14)
- Modify actual UG sections based upon FAQ responses
- Meeting scheduled with COFAR in November
- Develop Checklist/Recommendation document
In NSF OIG 14-1-006, the institution cited the FAQs. In response, the auditors suggested that “while the responses to the FAQ’s indicate that prior approval is not required from NSF to exceed the 2 month salary rule, the FAQ responses do not represent authoritative guidance and therefore do not overrule NSF’s Award and Administration Guidelines.” COGR is concerned with this statement by the NSF OIG as it could set a more broad precedent that agency FAQs cannot be relied upon.
Questions or Comments?

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