



Extramural Fund Management

November 12, 2020

Agenda

- **Effort Report Certification**
- **Final Financial Deliverable Revision Procedure**
- **Mass Leave Correction**

Effort Report Certification

Yoon Lee

Effort Report Status

- **Effort Report Certification Progress as of November 12th (released on September 24th)**

Reporting Period	Summer 2018	Fall 2018 (Modified)	Winter 2019	Total
Certified	208	2,511	2,104	4,823
Open	226	3,529	3,002	6,757
Total	434	6,040	5,106	11,580
Certification Rate	47.93%	41.57%	41.21%	41.65%

- <https://portal.research.ucla.edu/EffortReportingCertification>

- **Reports flagged as “Under Prelim Review” in ERS due to unresolved UCPATH defects when released.**

Issue description	Number of reports with errors
Incorrect percent of effort for effort bearing payroll line	351
Pending mass leave correction	547
Missing payroll records	393
Missing Y-OTC or N-OTC lines	234
Total effort reports with errors	1,525
Total number of effort reports	11,580
Error Rate	13.17%

- **Deadline is now extended from Friday, November 13th to Monday, November 30th.**
 - Certify reports that are not flagged as “Under Prelim Review” except for the first issue listed above: **5,583** reports to go!

Effort Report Status

- **Reports flagged as “Under Prelim Review” in ERS due to unresolved UCPATH defects.**

Issue description in Comment	Status
Incorrect percent of effort for effort bearing payroll line–review supplemental Excel file and job aid provided by EFM before certification	Departments are required to make manual adjustments. The training webinar was held on 10/26/20.
Pending Mass Leave Correction (MLC) entry–do not certify until further instruction is provided by EFM	Mass Leave Corrections have been processed and posted to Labor Ledger and General Ledger but not loaded to ERS yet.
Missing payroll record(s) in effort report–do not certify until further instruction is provided by EFM”	UCLA is working with UCPATH Center to find a solution.
Y-OTC or N-OTC indicator is missing–do not certify until further instruction is provided by EFM	UCLA is working with UCPATH Center to find a solution.

- **More detailed special instructions can be found on EFM website including**
 - ERS master exception list
 - Presentation and recording of the ERS webinar for UCPATH defects
 - Job aid – recalculated effort reports
 - <https://efm.research.ucla.edu/special-instructions-ers-release/>

Final Financial Deliverable Revision Procedure

Jennifer Iglesias

Revising Final Financial Deliverables

- Effective 10/09/20, updates were made to EFM's procedure on revising final financial deliverables, describing scenarios when a revision may be needed for each fund.
- Whenever a final financial deliverable is revised, there are associated compliance and financial risks to consider (e.g. audit, cost recovery, controls in place to prevent this from re-occurring)
- If there is a decrease of expenses from the original final financial deliverable submitted to the sponsor, federal guidance requires the return of funds regardless of how much time has lapsed between the original final and revised final.
- If there is an increase of expenses from the original final financial deliverable submitted to the sponsor, federal guidance defines specific time limits and requirements before additional costs can be claimed for reimbursement.

Uniform Guidance

§ 200.344 Closeout: Revisions to the guidance effective November 12, 2020. The amount of time for prime recipients to submit closeout reports and liquidate financial obligations was increased from 90 to 120 days.

This section specifies the actions the non-Federal entity and Federal awarding agency or pass-through entity must take to complete this process at the end of the period of performance.

- (a) The recipient must submit, no later than 120 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award. A subrecipient must submit to the pass-through entity, no later than 90 calendar days (or an earlier date as agreed upon by the pass-through entity and subrecipient) after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award.
- (b) Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity must liquidate all financial obligations incurred under the Federal award no later than 120 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.
- (d) The non-Federal entity must promptly refund any balances of unobligated cash that the Federal awarding agency or pass-through entity paid in advance or paid and that are not authorized to be retained by the non-Federal entity for use in other projects.

§ 200.345 Post-closeout adjustments and continuing responsibilities

The closeout of a Federal award does not affect:

- (2) The requirement for the non-Federal entity to return any funds due as a result of later refunds, corrections, or other transactions including final indirect cost rate adjustments.

NIH Grants Policy Statement

- **8.4.1.5.3 Revised Financial Reports and Expenditures**

- In some cases the recipient may have to revise or amend a previously submitted FFR. When the revision results in a balance due to NIH, the recipient must submit a revised report whenever the overcharge is discovered, no matter how long the lapse of time since the original due date of the report.
- Revised expenditure reports representing additional expenditures by the recipient that were not reported to NIH within the 90-day¹ time frame may be submitted electronically through the FFR system to OFM with an explanation for the revision.
- The explanation also should indicate why the revision is necessary and describe what action is being taken by the recipient to preclude similar situations in the future.
 - This should be done as promptly as possible, but no later than 1 year from the due date of the original report for annual FFRs and no later than 60 calendar days from the due date of the original report for final FFRs.

¹ Except for awards under SNAP and awards that require more frequent reporting, the FFR is required on an annual basis. When required on an annual basis, the report must be submitted for each budget period no later than 90 days after the end of the calendar quarter in which the budget period ended. For SNAP awards, FFR expenditure data is required only at the end of a competitive segment. It must be submitted within 120 days after the end of the competitive segment and must report on the cumulative support awarded for the entire segment.

NSF PAPPG

- **E. Award Financial Reporting Requirements and Final Disbursements**

2. Grantees must liquidate all obligations incurred under their awards not later than 120 calendar days after the award end date.
3. NSF will financially close awards 120 days after the award end date and the award will be removed from the ACM\$ payment screen for active awards.
5. Grantees are authorized to make upward or downward adjustments to the Federal share of costs for a financially closed award within the following time limits:
 - Upward adjustments may be submitted through ACM\$ for up to 14 months after the financial closeout date of the award or until the appropriated funds cancel, whichever is earlier.
 - Downward adjustments may be submitted through ACM\$ until the appropriated funding for the award cancels.
 - The time limitation for ACM\$ downward adjustments has no effect on the requirement that the grantee return any funds due to NSF as a result of later refunds, corrections, or other transactions including final indirect cost rate adjustments.
 - In cases where the award appropriation has been canceled, the grantee should return the funds associated with the downward adjustment in accordance with section D. Cash Refunds and Credits to NSF.

Final Financial Deliverable Revision Procedure

- Once the final invoice/financial report has been submitted to the sponsor, EFM considers revision requests in exceptional circumstances only.
- Departments request a revision to the final financial deliverable by completing a revision request form along with a revised closeout packet.
 - EFM's approval of a revision request does not guarantee sponsor approval.
 - If the revised final is rejected by the sponsor, the Department is financially responsible for unreimbursed expenses that were not included in the original final.
- Prior to submitting the revision request form to EFM, the department administrator ensures that all the following conditions are met:
 - All allowable and applicable expenses are posted to the general ledger.
 - All unallowable and inapplicable expenses are transferred off the fund.
 - All encumbrances and memo-liens are cleared.

Final Financial Deliverable Revision Procedure

- If an award has Multiple Fund Numbers assigned to One Award (MFNOA), final financial deliverables are set up for each fund number in PAMS and a revision may apply.
- If the revision of the final financial deliverable is to **increase** expenses:
 - Department submits the revision request form to EFM
 - Consider these factors when submitting a revision request:
 - Timing of original deliverable due date vs. date when the revision request is being made
 - Basis of the revision and the likelihood of reimbursement from the sponsor
 - EFM will review if the closeout packet was submitted to EFM by the department due date
 - If yes, revision can be considered for \$5,000 or over
 - If no, revision can be considered for \$10,000 or over
 - EFM will communicate the status of the revision request with the department.
 - Revision requests can be considered up to 2 times within 120 days after the submission date of the original final or the original final due date, whichever is later.

Final Financial Deliverable Revision Procedure

- Revisions to **decrease** expenses will be considered for any amount without a limit to the number of times to revise the final.
- Different scenarios can warrant a downward revision to the final.

Scenarios	Required action
Department submits the revision request form.	EFM will review and revise the financial deliverable when appropriate.
EFM initiates the revised financial deliverable upon discovery of errors.	The revision request form is not needed from the department. EFM will apply the Financial Closeout of Sponsored Projects procedure, informing the department of the new revised final amount, and issue the revised final financial deliverable.
An audit concluded disallowed costs and requires a revised final financial deliverable.	The revision request form is not needed from the department. Through the audit process disallowed costs are concluded. Department’s corrective action plan is required.
Sponsor's non-payment due to disallowed costs and the sponsor requests a revised financial deliverable.	The revision request form is not needed from the department. Disallowed costs are communicated from the sponsor and EFM should obtain the department’s corrective action plan via email.

Final Financial Deliverable Revision Request Form

- Department submits revision request form along with a revised closeout packet.
- Revisions require approval of PI, Department Fund Manager, and Department CFO, CAO, or Director.

Please complete the form below to request a revised final¹ invoice and/or financial report and submit it to your EFM contact along with a revised closeout packet. Prior to submission, all the following conditions must be satisfied:

1. All allowable and applicable expenses are posted to the general ledger.
2. All unallowable and inapplicable expenses are transferred out.
3. All encumbrances and memo-liens are cleared.

Sponsor		Fund Number	
Principal Investigator		Original due date of the final	
Date of Revision Request		Submission date of the original final	
Department	Name	Amount reported in the original final	
	Code		
Department Administrator	Name	Amount to be reported in the revised final	
	Email		
	Phone	Increase (Decrease)	

I, on behalf of the Principal Investigator, request a revised final financial deliverable to be submitted to the Sponsor. The Closeout Packet previously submitted is no longer an accurate representation of the financial status of the fund. Attached is a revised Closeout Packet. I confirm that all allowable and applicable expenses for the project are posted to the general ledger, all unallowable and inapplicable expenses are transferred out and all encumbrances and memo-liens are cleared.

I. Reason(s) why a revision is necessary and circumstances that caused the final to be inaccurate and/or incomplete.

II. Management action plan to prevent this from occurring in the future.

If more space is needed, attach a supplemental letter. Is it attached? YES NO

EFM's approval of a revision request does not guarantee sponsor approval. If the revised final is rejected by the sponsor, the Department is financially responsible for unreimbursed expenses that were not included in the original final.

UCPATH Mass Leave Corrections

Robert De Jesus

UCPATH Defect: Exception Earn Codes distributing incorrectly

Exception Earn Codes (e.g., VAC, SKL) distributing incorrectly

- Issue 1: UCPATH adds 2 lines when an exception is processed a credit to the REG-like Earn Code and a debit to the exception Earn Code (VAC, SKL). The credit and debit are not distributing appropriately across all FAUs in an employee's funding distribution.
- Issue 2: When a vacation or sick day is taken, the exception is posted in the following month. The debit to the Exception Earn Codes and Credit to the REG-like Earn Code are currently posted not to the fund where vacation or sick time was accrued, but to the fund where the employee's payroll is distributed in the month when the exception is processed.

Mass Leave Correction Solution

- UCPATH developed the MLC Program to address issues relating to Exception Earn Codes (e.g., VAC, SKL) distributing incorrectly
- The MLC Program has identified Payroll Data that has been affected by the aforementioned UCPATH Defect and will correct accordingly but with the the following exceptions
 - Payroll that includes PPS Transactions due to incomplete funding allocation data that exists outside of UCPATH
 - Payroll with issues relating to Exception Earn Codes distributing incorrectly, but was transacted upon with a Direct Retro, with the assumption that these were to correct the issues individually by the department
 - Payroll Data that were discovered with errors during MLC validation by the UCLA GL Stabilization Group
- MLC Transactions are processed through the same mechanism as Direct Retros to the Labor Ledger and the UCLA General Ledger
- Payroll Data has been corrected for the period of September 2018 – June 2020, which has been posted to the October 2020 Ledgers

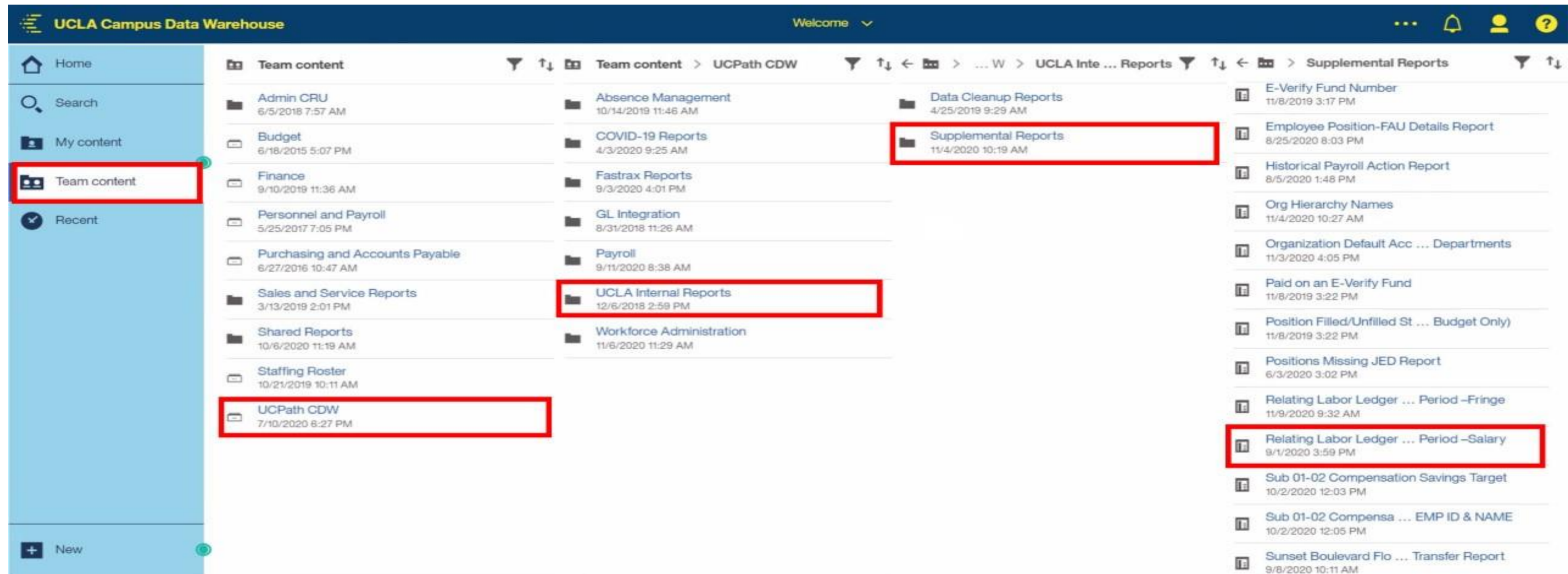
Identification of MLC Transactions

- MLC Transactions processed to funds can be identified by their prefix of “MLC” to the Salary UC Cost Transfer ID, which is not available on the DOPE Report

Location Code	Account Number	Cost Center Code	Fund Number	Sub Code	Object Code	Project Code	Earn Code	Pay End Date	UC Earn End Date	UC Accounting Date	Salary UC Journal ID	Salary UC Journal Line Number	Pay Calendar Run ID	Salary UC Cost Transfer ID
4	4			02	1950		VAC	10/31/2020	10/31/2019	10/31/2020	04P10	0024505	201031M0X	MLCLACMP191130M0X11301011
				02	1100		SKL	10/31/2020	09/30/2019	10/31/2020	04P10	0023906	201031M0X	MLCLACMP191031M0X10311011
				02	1100	R01	REG	10/31/2020	09/30/2019	01/01/1753			201031M0X	MLCLACMP191031M0X10311011
				01	1950		VAC	10/31/2020	09/30/2020	10/31/2020	04P10	0034714	201031M0X	
				02	1100		REG	10/31/2020	10/31/2019	10/31/2020	04P10	0023906	201031M0X	MLCLACMP191031M0X10311011
				01	1100		REG	10/31/2020	09/30/2020	10/31/2020	04P10	0033092	201031M0X	
				02	1100	R01	SKL	10/31/2020	09/30/2019	01/01/1753			201031M0X	MLCLACMP191031M0X10311011
				01	1100		REG	10/31/2020	10/31/2020	10/31/2020	04P10	0033092	201031M0X	
				02	1100		VAC	10/31/2020	10/31/2019	10/31/2020	04P10	0023906	201031M0X	MLCLACMP191130M0X11301011

Identification of MLC Transactions

- “MLC” indicator can be found in the “Relating Labor Ledger Data to General Ledger Accounting Period-Salary” report in CDW. <https://cdw.qdb.ucla.edu/ibmcognos/bi>
- Team content / UCPATH CDW / UCLA Internal reports / Supplemental reports / Relating Labor ~



Impact of MLC Transactions to Contract and Grant Funds

- Open Contract and Grant Funds with MLC Transactions are handled as follow
 - When project period is active and the fund is open in financial system, EFM will include MLC Transactions as part of the expenditures in the next deliverable to submit to the sponsor.
 - When project period is expired, the fund is open in financial system, and the final financial deliverable has not been submitted, EFM will include MLC Transactions as part of the expenditures in the Final Deliverable.
 - When project period is expired, the fund is open in financial system, yet the final financial deliverable has been submitted,
 - EFM will consider the credit amount and the date when the final was submitted to decide whether to revise the final and/or return overpayment to the sponsor.
 - EFM will consider the debit amount and the date when the final was submitted to decide whether to revise the final to request for additional payment to the sponsor or to cover it with central funding.

Impact of MLC Transactions to Contract and Grant Funds

- Closed Contract and Grant Funds with MLC Transactions are handled as follow
 - Funds with an overall Debit MLC Transactions will remain closed. MLC transactions will be routed to the Chancellor's fund.
 - Funds with an overall Credit MLC Transactions with <\$100 will remain closed. MLC transactions will be routed to the Chancellor's Fund.
 - For federal and federal flow through awards, EFM will return overpayment to US Treasury in aggregate without revising the final financial deliverables for individual awards.
 - Funds with an overall Credit MLC Transactions with >\$100 has been reopened. EFM will issue a revised final and a refund to the sponsor
 - For MLC transactions routed to Chancellor's funds, General Ledger will reflect the Chancellor's Fund. However, Labor Ledger will reflect the closed C&G Fund for the MLC Transactions. This is an important distinction for downstream implications such as Effort Reporting

Reopened C&G Funds with MLC Transactions

- 132 C&G Funds have been reopened to allow the processing of MLC Transactions that have an overall credit balance >\$100
- List of Reopened Funds will be provided to show Department Ownership and the respective EFM Accountant
- EFM accountants will initiate the revision of the Final Deliverable for all affected funds. No action is required on the department end.

Future MLC Runs and Permanent Fix to Defect

- Issue 1 relating to Exception Earn Codes (e.g., VAC, SKL) distributing incorrectly has been fixed within UCPATH
- Issue 2 relating to Exception Earn Codes (e.g., VAC, SKL) distributing incorrectly is still an active defect
- Payroll from July – October 2020 will need to undergo the same corrections for Issue 2, but will not occur until other urgent defects has been fixed (Scheduled to be completed in November 2020)
- Permanent fix to Issue 2 is being finalized with UCPATH with the required approval from all UC Campuses

Any Questions?

Contact Information

EFM Website

<http://efm.research.ucla.edu>

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