

Question	Answer
<p>1. What is MSU’s policy on overseas allowances? Are they allowable? Restrictions? Can an employee receive them on one grant, but not another?</p>	<p>There is no university policy on overseas allowances. They are allowable per MSU if they are allowable by the sponsor. An employee could receive the allowances on one grant but not another or could receive only a portion of the allowances, depending on sponsor requirements and/or department and employee negotiation.</p>
<p>2. How is the off-campus/ 26% facilities and administrative cost rate determination made? What items qualify as “off-campus?”</p>	<p>To determine whether the on or off campus rate applies, review the budget categories to identify where the expenses will occur. The following budget categories are excluded from this analysis: equipment, space rent, subcontracts, and F&A. If the majority of the expenditures are incurred and/or used off-campus, then the off-campus rate applies to the full project, https://osp.msu.edu/PL/Portal/DocumentViewer.aspx?cga=aQBkAD0AMQA2ADUA#Offcampus</p>
<p>3. What is required from subawardees at the proposal stage?</p>	<p>Ideally, OSP would like to have the Scope of Work, Budget and Budget Narrative, and completed and signed Subrecipient Commitment Form. Please see the Pre-Award Considerations here for more information.</p>
<p>4. What is required regarding conflict of interest disclosures, export control, human subjects, and animal subjects approval at the proposal and award stage?</p>	<p>All investigators who submit proposals to NSF or PHS agencies must certify an Annual Conflict of Interest Disclosure prior to their proposal being submitted by OSP.</p> <p>Review for compliance with export controls and trade sanctions is typically performed at the award stage rather than the proposal stage. There are a few circumstances that require an Export Control and Open Research Review Worksheet (ECORRW) to be completed prior to proposal submission. For additional information on export control review visit the Export Control Procedures webpage.</p> <p>At the proposal stage the use of humans/animals should be disclosed within the application and on the eTransmittal. Any Principal Investigator who anticipates the use of human subjects/animal subjects in his/her research must complete a protocol for review and receive approval by the IRB/IACUC prior to account set up. The protocol must be approved by the IRB/IACUC prior to the start of any research activities involving human subjects/animals. CGA cannot issue a project account number without this approval. https://osp.msu.edu/PL/Portal/DocumentViewer.aspx?cga=aQBkAD0AMwA3ADMA</p>

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<p>5. Once the project has been funded. How do I go about getting the subaward reimbursed? Are there certain forms that need to be completed? If so, are there any examples of how to complete them so that when I submit it for reimbursement they have what they need?</p>	<p>An invoice should be routed by the department as a disbursement voucher. Make sure to use the correct object codes and attach the invoice and PI certification. An invoice cannot be paid until the subaward had been fully executed.</p> <p>Make sure whatever system you're using to track expenses; you are still working with CGA so that Account Explorer (the system they use) is continuing to stay updated. Without this, invoices could be disapproved because what they see at CGA isn't what you're seeing.</p> <p>Make sure that if a university is using their own invoice form they are either avoiding general terms like "other" or they are regularly providing back-up documentation to you for expenses invoiced like that.</p> <p>Subaward tools and guidance can be found on CGA's website Account Setup/Modification / Subwards and "additional information".</p>
<p>6. Where do I go for assistance with international sponsored awards questions?</p>	<p>The International Sponsored Awards Workgroup has created a Subject Matter Expert list for International Sponsored Awards. The Subject Matter Expert List provides contact information for MSU staff who can answer specific questions about international work. To better assist, some of the contacts may refer to another person depending on the situation. When a name is not identified, please call or email the number or email address listed.</p> <p>https://osp.msu.edu/PL/Portal/DocumentViewer.aspx?cga=aQBkAD0ANAAYADAA</p>
<p>7. In our experience, working with subcontractors in foreign nations can be challenging due to different financial standards, time zones, etc. Do you have tips on how to start relationships with subcontractors or foreign consultants paid on a services contract?</p>	<p>The biggest delay we see in CGA with NRAPSC's is payment amounts without a rate justification. In order to determine reasonableness, it is important to explain how an amount was determined to be appropriate for a consultant, especially for lump sum amounts or those not on an hourly or daily basis. These agreements should be initiated prior to work being started.</p> <p>Discuss regular times to meet via Skype or Zoom sessions. I have started to prefer Zoom as it lets me share my screen with the consultant so that we can literally be on the same page. Work with your supervisor if need be to determine if coming in earlier and leaving later on a specific day of the week is appropriate (if you can't get a time to meet with them that works). Understanding the unique situations that our foreign consultants are in is key – we have a consultant in Ghana and he regularly misses sessions or responds to e-mail intermittently because the village he is in in Ghana tends</p>

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	to lose power when it rains. Patience and understanding can go a long way here – you have to build a relationship with the consultant because you want them to feel comfortable explaining their difficulties to you so that you can make adjustments in the process to better fit the situation.
<p>8. Can you provide insight with understanding risk assessments on subaward advance payments and the flexibility of determining cash flow needs?</p>	<p>Subrecipient risk assessment is done either at high or low risk level. There are multiple factors that would be considered to assess subrecipient’s risk: past experience, financial standing (evaluating current audited financial statement), and years in business. Prior to the execution of a subaward, OSP/CGA will also review several other considerations to determine the level of oversight to be included in each specific subaward document. Additional factors impacting risk level are: funding source, type of contracting mechanism, percentage of MSU’s award being obligated to the subrecipient, involvement of human or animal subjects.</p> <p>Each subrecipient is different which makes it challenging to determine the appropriate payment structure. High risk subrecipients are often those who do not have established financial systems or a history of clean audits. It is not uncommon for smaller partners in foreign countries to be determined as high risk by MSU, as they may not be experienced in providing the type of financial information and documentation required by our sponsors. It’s important to work with your subrecipient ahead of time to determine their cash needs, as they may not have enough cash on hand to maintain work while waiting for MSU payments. Advances can be considered based on need. If an advance is requested, think about a reconciliation schedule that doesn’t overburden the subrecipient to prevent future delays.</p>
<p>9. Does the Export Controls and Trade Sanctions Office (ECTS) need to sign-off on visa applications?</p>	<p>Typically, Export Controls does review H1B and J1 visa applications. Depending on the type of visa, OISS may tell departments to also send the applications to Export Controls or the information can be sent to both offices as the same time.</p>
<p>10. How do I help a subawardee establish a Data Universal Number System (DUNS) number?</p>	<p>Any entities receiving funding from the US federal government need to obtain Data Universal Number System (DUNS) number. A DUNS number is a unique nine-character number used to identify an organization. The federal government uses the DUNS number to track how federal money is allocated.</p> <p>If you organization does not have a DUNS number, visit the Dun & Bradstreet (D&B) website http://fedgov.dnb.com/webform/displayHomePage.do, or call 1-866-705-5711 to register or search for a DUNS number. Registering for a DUNS number is free of charge. You will need the following information to obtain DUNS number: name of</p>

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	<p>organization, organization address, name of the chief executive officer (CEO) or organization owner, legal structure of the organization (corporation, partnership, proprietorship), year the organization started, primary type of business, total number of employees (full and part-time).</p> <p>Allow up to two business days to obtain a DUNS number, but it can be one business day.</p>