



### PAF TEAM INFORMATION

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*Compliance is everyone's responsibility.*

### CHANGE IN PAF DEADLINES

Due to a significantly increased PAF Team workload related to the HRMS upgrade and FMS implementation activities, as well as activities and issues related to the State funds budget reductions, the previously established goals for PAF to complete various types of assignments must be modified. In particular, the goal to complete new account setups (or new budget year setups for existing accounts) will be changed from 3 days to 5 days.

For the next few months, we will have to temporarily re-assign some PAF Team members to work primarily on activities related to the aforementioned special projects. As a result, there will be fewer team members available to work on daily/routine assignments, thus the completion time for those activities will be delayed.

As always, we will make every effort to complete tasks such as account setups or PA reviews in time to meet payroll processing, accounts payable, reporting, billing, or other deadlines. We appreciate your understanding and assistance as everyone in the institution works to meet the challenges presented by the new software implementation and the budget reductions.

### GUARANTEEING PAYMENT FOR ACCOUNTS THAT ARE SET UP EARLY

Whenever a request is submitted to set up an account prior to the completion of the finalized funding document (receiving the notice of grant award or executing/signing the contract), the department is "guaranteeing" that there will be departmental or gift funds that will cover the expenses that are incurred on the account should it later turn out that the award is not received or the contract not executed. This also applies to setting up a new budget period on an existing account prior to receiving the completed award/contract documents for the new period.

The Grant Accounts Management Guide provides templates for the request of early account setup. It is not required that these templates be used. However, using the templates can help ensure that all the necessary information is submitted and the request can be processed as quickly as possible.

The important thing to remember is that if there is a problem with the completion of the funding document, the department is

responsible for covering expenses that were incurred for the project.

## PRE-AWARD COSTS ON FEDERAL GRANTS

Pre-award costs on federal grants are allowable in limited instances. The PHS guidelines state that whenever an institution incurs pre-award costs, it does so at its own risk.

Pre-award costs are only allowable if they are considered necessary to the conduct of the project. The costs must be allowable under the terms and conditions of the potential award or UTHSC-H policies.

The primary guideline to keep in mind is that pre-award costs should not be requested if it results in over-lapping budget periods or accounts. For example, it is a problem to have both the current account and the renewal account active at the same time.

### *Basic guidelines for Pre-award Costs*

#### For new awards:

Allowable for costs incurred up to 90 days prior to the effective date of the projected award.

#### For competing (renewal) continuations **not** in a no-cost extension year:

Not allowable because it would result in 2 accounts being active for the same project at the same time.

#### For competing (renewal) continuations that are in a no-cost extension year:

Allowable once the effective date of the renewal is determined, so that the old account can be ended and inactivated.

#### For non-competing continuations:

Not allowable because the expenses would cross budget periods.

## CHANGE IN SCOPE

Certain actions in administering or completing federal grants have been classified by PHS and/or NIH to be changes in scope. A change in scope **always** requires prior approval by the funding agency.

Actions that are considered to be a change in scope include:

- Substitution of one animal model for another.  
*Example: Changing from rats to mice.*
- Any change from the approved use of animals or human subjects.  
*Example: Starting or discontinuing the use animals or human subjects.*
- Shifting the research emphasis from one disease to another.  
*Example: Changing from research on cancer to research on CHD.*
- Transferring the performance of substantive programmatic work to a third party by contract or any other means.  
*Examples:*
  - (a) *Subcontracting 25% or more of the work to UTMB or any another institution.*
  - (b) *Using consultants or contract personnel to provide 25% or more of the work that was originally proposed to be provided by UTHSC-H employees.*
- Change in key personnel.  
*Examples:*
  - (a) *Change in PI. (Such as when the PI withdraws from the project or is absent from the project for any continuous period of 3 months or more.)*
  - (b) *Reduction of the PI's time/effort by 25% or more from the level that was approved at the time of the award.*  
*Scenario: The application stated that the PI was going to give 30% effort on the project, but now wants to reduce that effort. The effort can only be reduced as low as 23% without requiring agency approval. Calculation:  $0.30 \times 0.25 = 0.075$  as the maximum allowable reduction.  $0.30 - 0.075 = 0.225$  (which rounds to 23%).*
- Significant rebudgeting.  
*Examples: The cumulative amount of the budget modifications moving funding between or among cost categories for the current budget period exceeds 25% of the total award amount or \$250,000, whichever is less.*
- Incurrence of patient care costs not previously approved by PHS and/or when a grantee desires to rebudget funds out of the patient care category.