



MOUNT SINAI
SCHOOL OF
MEDICINE

Mount Sinai School of Medicine

Grant Compliance

Yale Audit By OIG

- OIG Disallowed \$194,000 of \$572,000 Subcontract to Yale from U. Mass
- Disallowed Expenses Did Not Comply with Federal Cost Principles
- Now Conducting Follow-up on Audit of 47 Grants Totaling \$47 Million over past 10 years
- Three Categories of OIG Findings:
 - Effort Reporting – 2 unsigned Effort Reports Disallowed
 - Level of Effort – Charged vs. Committed Effort
 - Cost Allocation Methodologies
 - 29 cost transfers disallowed
 - Pre-award costs disallowed
 - Allocation of costs among closely related projects disallowed



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Yale Audit By OIG (Cont.)

- **Action Items:**

- » Ensure All Effort Reports Properly Completed and Returned to Sponsored Projects Accounting
- » Review Actual Effort Charged vs. Committed Effort
- » Ensure Documentation is Adequate That Justifies Cost Transfers
- » Review Allocation Methods for Costs Allocated to Closely Related Projects



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Faculty Charged 100% to Sponsored Programs

- DHHS OIG Audit Disallowances for Faculty Effort Devoted to Proposal Preparation
- Our Policy: MSSM Salary Distribution = Effort Allocation.
- Risk: Faculty Who Charge 100% Effort to Sponsored Projects May Be Devoting Effort to Other Activities
 - Teaching
 - Patient Care
 - Proposal Writing
 - Administration
 - Committee Work
 - Named Investigator on Project with no Effort
- *Note: Effort on Progress Reports for non-competing continuations may be charged to grants, but not proposals for competing grants.*
- Action Item: Review actual effort for all Faculty charged 100% to Sponsored Project, Make any necessary adjustments.