



LEES Chartered Certified Accountants
and Registered Auditors (#0361133)

Karolinska Institutet

Review of NIH Projects for Federal Compliance

1 January 2019 to 31 December 2019



Karolinska Institutet

June 2021

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1. INTRODUCTION

1.1 Letter of Instruction

In accordance with Karolinska Institutet's written instructions dated 15 June 2020, we have conducted a review of arrangements for effective management of research grants from the United States National Institutes of Health.

1.2 Scope of Work and Limitations

Our work focused on the areas specified by Appendix XI – "Compliance Supplement" of Section 2 of the United States Code of Federal Regulations – pt. 200 (2 CFR 200). The management of the university is responsible for the university's compliance with these requirements. We have conducted programme specific audits to test the following:

- The integrity of the financial statements;
- The effectiveness of the internal control structure, including controls over the grants;
- Compliance with the terms and conditions of the grants and other agreements; and
- Follow up of prior audit findings.

The scope of our work has been limited both in terms of the areas and operations which we reviewed, and the extent to which we have reviewed them. There may be matters, other than those noted in this report, which may be relevant in the context of the report and which a wider scope might uncover.

The engagement was performed in accordance with the International Standard on Related Services 4400 "Engagements to Perform Agreed-upon Procedures Regarding Financial Information" and with applicable national standards.

This report is made solely to Karolinska Institutet for the purpose of certifying certain costs claimed and may not be relied upon for any other purpose whatsoever. To the fullest extent permitted by law, we do not accept nor assume responsibility to anyone (including the funding body) other than Karolinska Institutet for this report, or the opinions we have formed.

Our work was carried out remotely for the 2019 audit.

1.3 Limitation of Liability

We draw your attention to the limitation of liability clauses in our engagement letter.

1.4 Forms of Report

For convenience, this report may be made available in electronic as well as hard copy format. Multiple copies and versions of this report may exist in different media. In case of any discrepancy, the final hard copy should be regarded as definitive.

1.5 Confidentiality

This report is confidential and has been prepared exclusively for Karolinska Institutet.

1.6 General

The report is issued on the understanding that all matters, financial or otherwise, have been drawn to our attention and which may have an impact on our report up to the date of signature.

2. EXECUTIVE SUMMARY

2.1 Inherent Risk of Karolinska Institutet

This Single Audit on NIH projects is part of a series of activities undertaken at the university to ensure that research funding is effectively managed and controlled. The university's dedicated "Research Support" office aims to help researchers manage research funding from a variety of sources. Numerous internal and external audits have been performed at the university, with no material weaknesses identified.

2.2 Testing Sample & Sample Size

We have assessed Karolinska Institutet to be an overall "high-risk" assignment on the basis that no NIH reviews have been carried out by LEES previously. Karolinska Institutet's expenditure on active NIH federal awards for 2019 totalled \$4,567,612.87 across 45 projects (Appendix B). Of this, 18 projects were chosen for expenditure sampling. Expenditure was sampled totalling \$3,334,398.48 (73.0%) in accordance with Uniform Guidance pt. 200 (2 CFR 200).

2.3 Single Audit Compliance Requirements

Uniform Guidance compliance covers fourteen key areas, some of which cannot be entirely applied to Karolinska Institutet as an organisation foreign to the US, and subject to Swedish and EU legislation. Each area is summarised below:

	Compliance Requirement	Internal Controls Testing	Compliance Testing
A	Activities Allowed or Unallowed	✓ (Satisfactory)	✓ (Satisfactory)
B	Allowable Costs/Cost Principles	✓ (Satisfactory)	✓ (Satisfactory)
C	Cash Management	✓ (Satisfactory)	✓ (Satisfactory)
D	[Reserved]	N/A – Reserved for possible future compliance	
E	Eligibility	✓ (Satisfactory)	✓ (Satisfactory)
F	Equipment & Real Property Management	✓ (Satisfactory)	✓ (Satisfactory)
G	Matching, Level of Effort, Earmarking	N/A – Not relevant for these awards	
H	Period of Availability of Federal Funds	✓ (Satisfactory)	✓ (Satisfactory)
I	Procurement & Suspension & Debarment	✓ (Satisfactory)	✓ (Satisfactory)
J	Programme Income	N/A – No such income	
K	[Reserved]	N/A – Reserved for possible future compliance	
L	Reporting	✓ (Satisfactory)	✓ (Satisfactory)
M	Sub-recipient Monitoring	N/A – No Subrecipients	
N	Special Tests & Provisions	N/A – No such tests with these awards	

2.4 Findings & Questioned Costs

We noted 7 advisory findings totalling \$68,353.25, during our review of the grants (Section 6). Karolinska Institutet will action these findings as agreed in Section 6.

2.5 Conclusion

Karolinska Institutet's financial statements are subject to annual review by its external auditors, The Swedish National Audit Office. In 2019 an unqualified opinion was issued.

We reviewed the internal controls in place over Karolinska Institutet relating to grant funding and note there are no material weaknesses to report.

On the basis of our testing of a sample of projects, and management assertions, Karolinska Institutet has complied with the Uniform Guidance in respect of grants from United States National Institutes of Health in the period 1 January 2019 to 31 December 2019.

CG Lee Limited

LEES Chartered Certified Accountants

Registered Auditors
ACCA 0361133
Puerorum House
26 Great Queen Street
London, WC2B 5BB
UK

10 June 2021

For Karolinska Institutet:

Katarina Bjelke

Katarina Bjelke
University Director
Universitetsledningen
Nobels väg 6, 171 65 Solna
Sweden

Date: *14th June 2021*

3. INHERENT RISK OF KAROLINSKA INSTITUTET

3.1 Grant Management Office

Karolinska Institutet has a dedicated Research Support Office which aims to help researchers manage research funding from a variety of sources.

The Office is responsible for all internal and external reporting on the financial aspects of research, including supporting Principal Investigators in meeting financial assurance requirements. The Office acts as an independent function ensuring financial separation of duties between themselves and the researchers where project delivery takes place.

The Office is separated into several divisions, including the Grants Management Office, responsible for the day-to-day Post-Award financial management of grants, and the Compliance and Data Office who take an institutional role in central policies and regulatory Compliance. Karolinska Institutet have dedicated staff devoted to US grant compliance, and regularly attend training in US grants compliance to ensure continued conformity to regulations.

3.2 Research at Karolinska Institutet

Karolinska Institutet accounts for the single largest share of all academic medical research conducted in Sweden. Research activities span the entire medical field, from basic experimental research to patient-oriented research and global health. The Nobel Assembly at the Karolinska Institutet awards the Nobel Prize in Physiology or Medicine.

The university has over 45 official research centres, including 4 National and International Research Centres of excellence:

- National Centre for Suicide Research and Prevention, NASP
- International Neuroinformatics Coordinating Facility, INCF
- Karolinska Comprehensive Cancer Centre
- Centre of Excellence for Sustainable Health

The university's activities are dominated by research activities, and they comprise approximately 84 per cent of total turnover.

3.3 Project Income

At the end of 2019, Income related to competitive projects across the whole university was 3,277,045,000 SEK (approx. \$390m) per appendix A.

4. TESTING SAMPLE & SAMPLE SIZE

4.1 Overall Risk Assessment

2 CFR 200 subpart F requires that any US organisation that expends \$750,000 or more per year in US Federal grants be subject to an audit under both 2 CFR 200 and the Generally Accepted Government Auditing Standards (GAGAS).

As a foreign institution, subpart F of 2 CFR 200 is not applicable to Karolinska Institutet (§200.101), and as such a review of US grants is not a mandatory requirement.

However, Karolinska Institutet's expenditure on awards from the Department of Health and Human Services (DHHS) in 2019 is above the necessary threshold (\$750,000) for a mandatory review of grants from this agency as stated in 45 CFR 75.

Karolinska Institutet has opted to undertake a Single Audit in respect of their grants from only their NIH projects, as opposed to all US Federal Agencies, in accordance with 2 CFR 200 Subpart F.

We have assessed Karolinska Institutet to be a "high-risk" assignment as this is the first engagement carried out by LEES.

A Schedule of Expenditures of NIH Awards is included in Appendix B which details the amount expended on each award throughout 2019.

4.2 Sample Size

In accordance with §200.518 of 2 CFR 200, we have identified and audited Karolinska Institutet's DHHS awards on the basis that all awards have been made under the Research and Development Cluster. We are therefore required to test a minimum sample of 40% of Federal grants relating to the financial year 1 January 2019 to 31 December 2019. In the year of review, there were 45 active projects across the university with a total expended of \$4,567,612.87 (Appendix B). From this, 18 projects with expenditure totalling \$3,497,094.82 were chosen for expenditure sampling. Expenditure was sampled totalling \$3,334,398.48 (95.3%) in accordance with Uniform Guidance pt. 200 (2 CFR 200).

5. UNIFORM GUIDANCE COMPLIANCE REQUIREMENTS

Compliance covers fourteen key areas, some of which cannot be entirely applied to Karolinska Institutet as an organisation foreign to the US and subject to Swedish and EU legislation. Each area is identified and documented below.

5.1 Activities Allowed or Unallowed (A)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. Based on this assessment, each expense activity across all NIH Federal projects reviewed was tested to ensure its activity was allowable (in accordance with the Terms & Conditions of the Grant Award), and properly classified and accumulated into the activity total. No large transfers of funds from programme accounts were identified which may have been used to fund unallowable activities.

CONCLUSION:

- Internal control was assessed and tested as required.
- Each of the samples of Federal awards tested was expended only for allowable activities.

5.2 Allowable Costs/Cost Principles (B)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. Based on this assessment, each expense cost across all NIH Federal projects reviewed was tested to ensure its cost was allowable (in accordance with the Terms & Conditions of the Grant Award). This covered expense costs such as direct costs, salaries & wages, equipment, and facilities & administrative (indirect) costs.

CONCLUSION:

- Internal control was assessed and tested as required.
- Each of the samples of Federal awards tested was expended only for allowable costs. We noted 6 advisory findings across questioned costs totalling \$68,591.79, per Section 6.

5.3 Cash Management (C)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. All 18 of the projects were funded on a reimbursed payment basis. A sample of reimbursement requests were traced to supporting documentation to show that the costs for which reimbursement was requested were paid prior to the date of the reimbursement request. No pre-financing interest was earned on Federal Funds drawn down, as all draw-downs were in arrears.

CONCLUSION:

- Internal control was assessed and tested as required.
- For the sample tested, costs for which reimbursement was requested were paid prior to the date of the reimbursement request.

5.4 [Reserved] (D)

This Compliance Requirement is no longer applicable to Single Audits conducted under 2 CFR 200.

5.5 Eligibility (E)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. It was determined that Karolinska Institutet was eligible to receive both direct awards and sub-awards and any awards were within the funding limits for a non-US recipient.

CONCLUSION:

- Internal control was assessed and tested as required.
- Karolinska Institutet was eligible for funding from Federal Institutions as a foreign organisation.

5.6 Equipment & Real Property Management (F)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. No real property was purchased or disposed of by Karolinska Institutet in the year under review using Federal funds and therefore this element is irrelevant. Equipment totalling \$73,488.02 was purchased during the year. No equipment purchased using Federal funds was disposed of during the year.

CONCLUSION:

- Internal control was assessed and tested as required.
- Equipment purchased using Federal funds was maintained and recorded effectively and in accordance with Compliance Requirements.

5.7 Matching, Level of Effort, Earmarking (G)

Karolinska Institutet's Federal grants do not require any matched funding (requirements to provide contributions from another source of a specified amount or percentage to match Federal awards) nor have any level of effort criteria. This Compliance Requirement is therefore irrelevant for Karolinska Institutet.

CONCLUSION:

- This Compliance Requirement is not applicable to Karolinska Institutet.

5.8 Period of Availability of Federal Funds (H)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. Award documentation for the 18 NIH Federal projects tested were reviewed; awards were re-issued on an annual basis and any underspend from a previous period carried forward into next year's budget. All transactions recorded during the period of availability were verified to underlying obligations to ensure they occurred within the period of availability.

CONCLUSION:

- Internal control was assessed and tested as required.
- Federal funds were obligated within the period of availability.

5.9 Procurement and Suspension and Debarment (I)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. Karolinska Institutet is required to comply with their own internal procurement procedures and thresholds, which are consistent with 45 CFR 75 §329.

Karolinska Institutet is also required to comply with EU Directive 2004/18/EC, which requires all contracts over €214,000 (\$260,000) for services and supplies, and €5,350,000 (\$6,515,000) for works, to be put out to tender.

CONCLUSION:

- Internal control was assessed and tested as required.
- Karolinska Institutet meets the Federal and EC requirements with regards to public procurement.

5.10 Programme Income (J)

Programme income is gross income received that is directly generated by the federally funded project during the grant period, of which Karolinska Institutet had none for the projects sampled in the year under review. This Compliance Requirement is therefore irrelevant for Karolinska Institutet.

CONCLUSION:

- This Compliance Requirement is not applicable to Karolinska Institutet.

5.11 [Reserved] (K)

This Compliance Requirement is no longer applicable to Single Audits conducted under 2 CFR 200.

5.12 Reporting (L)

An understanding of Karolinska Institutet's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. For the 18 projects reviewed, each declaration of expenditure was verified to the accounting system and supporting worksheets, and mathematically checked for accuracy.

CONCLUSION:

- Internal control was assessed and tested as required.
- Required reports for Federal reports include all activity of the reporting period, which are supported by applicable accounting records, and are fairly presented in accordance with governing requirements.
- We noted an understatement of \$238.54 as per Section 6.

5.13 Sub-Recipient Monitoring (M)

An understanding of the university's internal control was obtained to allow us to plan the audit to a "high-risk" assessment. Karolinska Institutet did not make any subawards in 2019. This Compliance Requirement is not relevant for 2019.

CONCLUSION:

- This Compliance Requirement is not applicable to Karolinska Institutet for 2019.

5.14 Special Tests and Provisions (N)

There are no special tests or provisions specific to Karolinska Institutet's Federal awards, and therefore this section is irrelevant to Karolinska Institutet.

CONCLUSION:

- This Compliance Requirement is not applicable to Karolinska Institutet.

6. FINDINGS & QUESTIONED COSTS

Compliance Requirement	Finding & Implication	Rating	Proposed Action	Agreed Action
1 B – Allowable Costs/Cost Principles	For 5 of the projects tested, sufficient evidence could not be located for items selected for testing. This totalled \$4,982.70. These errors are not systematic.	Advisory	We recommend that full records are kept as evidence in order to support ledger transactions on NIH Federal Awards.	KI will continue to ensure that relevant supporting evidence is retained for expenditure reported. These will be deducted from the next claim.
2 B – Allowable Costs/Cost Principles	For 3 of the projects tested, the allocable Direct Costs for the rental of space consumed by projects was overstated by \$11,558.69. This arose chiefly due to inallocable elements included in some rental calculations.	Advisory	We recommend that only external rental costs that are fully evidenced and allocable are charged to NIH grants.	KI will ensure that only allocable space rental costs are charged to NIH projects. These will be deducted from the next claim.
3 B – Allowable Costs/Cost Principles	For 4 of the projects tested, costs totalling \$3,853.71 were found not to be directly related to the delivery of the projects. This error is not systematic.	Advisory	We recommend that expenditure ledgers are reviewed thoroughly before claims are made to ensure that only costs directly relating to the delivery of the individual Awards are allocated.	KI understand that costs can only be claimed on NIH projects that are directly attributed to the project. These will be deducted from the next claim.
4 B – Allowable Costs/Cost Principles	For 5 of the projects tested, the incorrect proportion of staff time was claimed. The costs did not accord to effort reporting documentation for 6 staff tested. This totalled \$48,114.65. This error is not systematic.	Advisory	We recommend that project claims for staff costs reflect the true amount worked on the project as per effort reporting evidence retained.	KI will continue to train relevant departments in the importance of accurate effort reporting and expenditure allocation. These will be deducted from the next claim.

Compliance Requirement	Finding & Implication	Rating	Proposed Action	Agreed Action
5 B – Allowable Costs/Cost Principles	<p>For 1 of the projects tested, costs totalling \$8.91 were found to be against the internal travel policy.</p> <p>This error is not systematic.</p>	Advisory	We recommend that expenditure ledgers are reviewed thoroughly to ensure costs are compliant with internal policy.	KI understand that costs must be compliant with internal policy. These will be deducted from the next claim.
6 B – Allowable Costs/Cost Principles	<p>For 1 of the projects tested, allocable costs totalling \$73.13 were charged, but these were not in accordance with internal project accounting policies. The charges related to the unrecoverable portion of partially recoverable Value Added Taxes, that are not charged as a matter of course to projects.</p> <p>This error is not systematic and occurred due to a coding error.</p>	Advisory	We recommend that expenditure ledgers are reviewed thoroughly to ensure costs are compliant with internal policy.	KI understand that costs must be compliant with internal policy. These will be deducted from the next claim.
7 L - Reporting	<p>For 2 of the projects tested, eligible F&A costs were omitted from direct expenditure items in error. This resulted in an understatement in F&A costs of \$238.54.</p> <p>This error is not systematic.</p>	Advisory	We recommend 8% F&A is claimed on all eligible direct costs.	KI will continue to ensure 8% F&A costs are claimed on all eligible direct costs. These will be added to the next claim.
TOTAL	\$68,353.25			

7. PRIOR AUDIT FINDINGS

As this is our first engagement with Karolinska Institutet, we have no prior audit findings to report or review.

APPENDIX A – Income From Grants 2019

Funding Source	2019 (000 SEK)	2018 (000 SEK)
Swedish Government agencies	1,274,654	1,229,454
Other Swedish organizations and non-profit associations	1,131,246	1,116,009
European Union	225,777	263,887
Other countries and international organizations	349,264	338,216
Private companies	193,599	223,074
Swedish Municipalities and regions	102,505	166,554
TOTAL	3,277,045	3,337,194

APPENDIX B – Schedule of Expenditures of NIH Awards

Internal Reference	Federal Agency	Contract Number	FAIN	Prime Awardee	Subrecipients	CFDA #	Amount Expended /\$	Amount Provided to Sub-Recipients /\$	Sampled
1	C173146293/303	HHS	1P01AI104722-01A1	P01AI104722	Scripps Institute	93.855	219,056.09	-	211,843.23
2	C173146373	HHS	5U01AI136677-03	U01AI36677	WITS Consortium	93.855	36,823.70	-	36,155.07
3	C173146413	HHS	5P01AI104722-05	P01AI104722	Scripps Institute	93.855	50,409.97	-	-
4	C173146423	HHS	3P51OD011132-59S1	P5OD011132	Emory University	93.351	30,649.99	-	30,548.85
5	C173750023	HHS	UM1AI068618	UM1AI068618	Fred Hutchinson Cancer Research Center	93.855	113,199.31	-	113,199.31
6	C22501453	HHS	1F31CA224806-01X1	F31CA224806	Karolinska Institutet	93.398	4,424.55	-	-
7	C23308253	HHS	5U01MH114812-03	U01MH114812	Allen Institute	93.242	1,384,780.64	-	1,344,841.39
8	C332401083	HHS	5P01HL103455-08	P01HL103455	University of Pittsburgh	93.838	5,716.50	-	5,716.50
9	C64219073	HHS	R01ES010219	R01ES010219	University of Rochester	93.113	5,818.22	-	-
10	C62511403	HHS	1R01ES028811-01	R01ES028811	Icahn School of Medicine at Mount Sinai	93.113	53,306.84	-	-
11	C62218203	HHS	1R01AI135108-01	R01AI135108	University of Arizona	93.855	59,985.26	-	-
12	H2123493	HHS	5U01CA187945-04	5U01CA187945-04	The Regents of the University of California	93.393	16,114.22	-	-
13	H2126003	HHS	GA7R01CA172437	R01CA172437	R01CA172437-05	93.396	39,667.44	-	39,271.47
14	H554305033	HHS	R01GM118012	R01GM118012	University of Missouri	93.859	53,490.14	-	-
15	H717457873	HHS	1R01DK108350-02	R01DK108350	University of California, Davis	93.847	80,111.07	-	-
16	K22124113	HHS	1R01DK105948-01	R01DK105948	Göteborgs Universitet	93.847	144,896.99	-	144,096.50
17	K22116193	HHS	1 R21 MH120824-01A1	R21 MH120824	The Regents of the University of Michigan	93.242	6,993.38	-	-
18	K23000393	HHS	5U19AI113182-05	5U19AI113182	University of Louisville Research Foundation Inc.	93.855	12,329.86	-	-
19	K25004063	HHS	1R01HL136137-01A1	R01HL136137	Regents of the University of Colorado	93.838	90,944.80	-	-
20	K62702363	HHS	HHSN275201300024I	HHSN275201300024I	Los Angeles Biomedical Research Institute	93.393	158,278.86	-	157,339.90
21	K62995173/183	HHS	1R01HD087712	R01HD087712	University of California	93.865	127,104.24	-	111,637.41
22	K822204003	HHS	1R01MH118245-01	R01MH118245	Yale University	93.242	94,803.29	-	-
23	K830724113	HHS	1R21MH112963-01	R21MH112963	The University of North Carolina at Chapel Hill	93.242	130,074.28	-	129,016.64
24	K830724083	HHS	1R01MH110427-01	RO1MH110427	The University of North Carolina at Chapel Hill	93.242	111,334.29	-	97,860.85
25	K924203003	HHS	5P30AG047845-04	P30AG047845	University of Washington	93.866	43,413.83	-	-
26	K926245053	HHS	1R01NS107607-01A1	R01NS107607	Drexel University	93.396	9,554.15	-	9,554.15

	Internal Reference	Federal Agency	Contract Number	FAIN	Prime Awardee	Subrecipients	CFDA #	Amount Expended /\$	Amount Provided to Sub-Recipients /\$	Sampled
27	S112501013	HHS	1R01AI135108-01	R01AI135108	University of Arizona		93.855	22,282.23	-	-
28	C5388033	HHS	U19MH114830	U19MH114830	Baylor College of Medicine		93.242	63,500.79	-	-
29	C5388043	HHS	1R01MH109556-01A1	RO1MH109556	Baylor College of Medicine		93.242	208,716.32	-	168,279.76
30	C810128213	HHS	5U01CA187945-05	U01CA187945	The Regents of the University of California, San Francisco Campus		93.393	42,404.67	-	-
31	C830118203	HHS	1R01HD088393	R01HD088393	The General Hospital Corporation/ The Brigham and Women's Hospital		93.865	32,590.81	-	31,247.62
32	C830118213	HHS	1R01DA048042-01	R01DA048042	Trustees of Indiana University		93.279	27,695.14	-	-
33	C850018203	HHS	5R01AG060470-02	R01AG060470	The University of Southern California		93.866	64,352.97	-	-
34	C850018293	HHS	1R01AG059329-01A1	R01AG059329	The University of Southern California		93.866	85,203.40	-	-
35	C850208253	HHS	5R21MH112963-02	R21MH112963	The University of North Carolina at Chapel Hill		93.242	18,091.87	-	-
36	C850308213	HHS	5R01MH102221-04	R01MH102221	The Trustees of Indiana University		93.242	7,377.41	-	-
37	C850408273	HHS	5R01MH077139-10	R01MH077139	University of North Carolina at Chapel Hill		93.242	425,235.33	-	393,229.25
38	C850408283	HHS	1R01MH109525-02	R01MH109525	Virginia Commonwealth University		93.242	23,604.67	-	-
39	C850418223	HHS	5R01MH106531-03	R01MH106531	Icahn School of Medicine at Mount Sinai		93.242	1,080.98	-	-
40	C850458203	HHS	1R21MH116188-01	R21MH116188	Karolinska Institutet		93.242	117,907.46	-	117,901.95
41	C870308213	HHS	5R01CA196931-03	R01CA196931	University of Southern California		93.393	42,396.00	-	-
42	C870318203	HHS	2R01MH097849-04A1	R01MH097849	Icahn School of Medicine at Mount Sinai		93.242	201,508.42	-	192,658.63
43	C870318213	HHS	1R01HD098883-01	R01HD098883	Icahn School of Medicine at Mount Sinai		93.865	6,805.94	-	-
44	C45020303	HHS	R01NS090919-04	R01NS090919-04	Drexel University		93.853	67,881.24	-	-
45	C45050153	HHS	1R01NS100928-01A1	R01NS100928	The Board of Regents of the Univ. Of Georgia		93.859	25,695.29	-	-
							TOTAL	4,567,612.87	-	3,334,398.48
										18
										3,497,094.82