Division of Research
Quarterly Research Administration Meeting

October 30, 2012
AGENDA

- Welcome and Introductions
- Pre Award Update
- Post Award Update
- Budget & Cost Analysis Update
- Technology Update
- Financial Conflict of Interest Update
- Welcoming Remarks
- Introduction of Division of Research Team
- Introduction of New Attendees
- Future Quarterly Research Administrators Meeting for 2013
  - January 24, 2013
  - April 30, 2013
  - October 29, 2013
  - All meetings are from 10:00 am – 12:00 pm in the MARC Pavilion
- Slides will be posted on the Division of Research website after meeting
Upcoming Changes to NIH Progress Reports

- NIH is shifting from the eSNAP to the Research Performance Progress Report (RPPR)
- Starting 10/19/12 all PIs will have the ability to either submit a traditional eSNAP through eRA Commons or an RPPR
- Usage of RPPR will become mandatory for all Streamlined Non-competing Award Process reports in April 2013.
- DOR will hold open labs in early 2013 in anticipation of the shift to assist with RPPRs as needed
- Additional details are available online at http://grants.nih.gov/grants/rppr/
Letters of Support from MDCPS

- University and MDCPS have instituted a centralized process to procure letters of support for proposals from the District.
- All draft letters must be submitted by DOR to the MDCPS Office of Grants Administration.
- MDCPS is requesting that the process be started at least one month prior to deadline.
- MDCPS Template Letter is online at the Preparing Your Proposal Section of the DOR website at http://research.fiu.edu/researchers/preparingProposal/documents/MDCPSLetterSupportGuidance.pdf
Changes to Subcontracting process are required to comply with recommendations from federal sponsors as well as audits at other universities

- Proposal Stage
  - Subawardee Commitment Form will be required to accompany the subawardee’s statement of work and budget
  - The form is available at http://research.fiu.edu/forms/proposalPreparation/subrecipientCommitmentForm.pdf
  - Subawardee will be required to make certain administrative, fiscal and policy certifications
  - PI will need to provide a rationale for the selection of the subawardee

- Negotiation Stage
  - At negotiation stage pre-award will be conducting a risk analysis to ascertain if any special conditions needs to be inserted into the subaward
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Post Award Update

- Changes to Subcontracting process (cont’d.)
  - Post Award Stage
    - Invoice payment process for subcontracts will be changing with new monitoring procedures
    - Invoices will be required to be sent first to Post-Award for review of fiscal compliance (i.e., to ensure that back-up documents are included and that budget is available to pay subcontractor)
    - If Post-Award approves, Post-Award will send invoice to PI for review to determine if technical work was appropriately performed. If approved,
    - For each invoice, the PI must (1) complete the Subawardee Invoice Approval Form (on the DOR website) for the invoice; (2) return that completed Subawardee Invoice Approval Form (3) together with the invoice to Post-Award for final approval.
Changes to Subcontracting process (cont’d.)

Post Award Stage

- If PI approves invoice for payment, PI should also receive the invoice in Panthersoft to evidence that it may be paid by FIU.
- If PI does not approve the invoice for payment, then PI should not receive the invoice in Panthersoft but should return the invoice to Post-Award, along with the Subawardee Approval Form describing the reason why the invoice is being denied.
- If the invoice is approved by both Post-Award and PI, Post-Award will then forward the approved invoice to Accounts Payable for processing of the payment to the subcontractor and Post-Award will notify the PI that it has forwarded the invoice to Accounts Payable.
Changes to Subcontracting process (cont’d.)

If the Invoice is not approved by either the PI or Post-Award, or by both, then the invoice will not be paid and DOR will take appropriate steps, in conjunction with the FIU General Counsel’s Office, to demand the subcontractor’s compliance with the subcontract or termination of the subcontract, as necessary.
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Post Award Update

- Changes in Post Award Staff:
  - Ana (Ani) Villanueva
  - Melissa Garzia
Audits:

- **Administrative Expenses**
  - Salaries of Administrative & clerical staff
  - Office supplies, postage, duplicating supplies, local telephone, cell phone, subscriptions & memberships, data processing/computer supplies, general purpose software

- **Sub recipient Monitoring**
  - Terms of main award flow down to sub recipient
  - Documentation

Audits conducted since last Administrator’s Meeting:

- The Children’s Trust (TCT)
- Early Learning Coalition (ELC), desk review
- USAID Tanzania, Burkina Faso,
- Federal Awards Audit for FY 2011-2012
Cost Transfers
- New Payroll System
- All payroll transfers need to match certifications.

Payroll & Non Payroll Cost Transfers
- Explanations should be able to stand alone, & be clear
  - How error occurred,
  - How the cost benefits the project it is being moved to,
  - What is being done to prevent the error from occurring in the future
- Refrain from abbreviations, or initials in the explanation
- Costs already transferred will be denied in the future
Cost Share Process Update

- New Project ID Number
- Process for E&G Cost Share

During award setup/modification, Post Award will contact Financial Planning (with copy to E&G expense manager) to process budget transfer for the current fiscal year.
- **Reminder to Colleges to Process Research Expenditures on Specific IDs**
  - To Avoid Mass Payroll Transfers at Year-End
- **To Clear/Resolve Existing Exceptions & To Prevent Future Exceptions**
  - Contact Sara Abraham x76438
- **Payroll Transfers Affecting Prior Semester Certified Effort Cards**
  - Contact Alejandra Salas x71696
- **Deadline to Certify & Process Summer 2012 Effort is Thursday, 11/8/12**
  - Delayed/Inaccurately Processed Certifications put FIU at Risk!
- **F&A Returns for Jan-Jun 2012 Returns Posted to Colleges & PIs**
  - SharePoint Email Links
- **Budget & Cost Analysis (BCA) Email Addresses:**
  - For Effort Reporting Questions: ecrt@fiu.edu
  - For Recharge Center Questions: recharge@fiu.edu
  - For F&A Return Questions: F&A@fiu.edu
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Technology Update – New Project Financial Reports

- Upgrades to Project Financial Reports (GrantP & GrantS)
  - Piloted during months of August/September.
  - Numerous usability enhancements for multiple perspectives (PI, Dept. Admin).
  - Payroll Detail included for dates after 12/31/2011. (PS HR Implementation)
  - Loaded into production tonight after 5PM.
Commitment Data in ecrt

- Awarded commitment data has been entered into ecrt for all active Project IDs with end dates since 8/2011. Post Award Grants Managers are managing commitment data for all ongoing award actions.
  - For questions about commitment data for a specific project, please contact your Post Award representative.
- Training guides posted on Effort Reporting section of Division of Research website (http://research.fiu.edu/effort/)
- Training sessions with Deans/Chairs to be conducted by DoR and Academic Affairs in upcoming months in order to better leverage data captured.
Commitment Data in ecrt – How to Access

Option 1: From the certifier’s effort card by hovering over the project description.
Commitment Data in ecrt – How to Access (cont’d.)

Option 2: From the certifier’s effort card by clicking ‘Related Reports’ and selecting ‘Commitment Listing Report’
Commitment Data in ecrt – How to Access (cont’d.)

Option 3: From the home page, click View Reports and select ‘Commitment Listing Report’ on the next page.
Topaz Implementation – Project Update

- IBC go-live was June 2012.
- IACUC go-live was July 2012.
- IRB go-live will be in January 2013.
  - IRB training will be conducted in December and January. Training dates to be announced in November.
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FIU Conflict of Interest in Research Policy

- Policy #2370.005 on the FIU Policies and Procedures Library at http://policies.fiu.edu/files/572.pdf

- Revised effective August 24, 2012 to comply with updated PHS regulations

- Updated PHS regulations require different reporting requirements from researchers of their outside activities and financial interests, different review process for COI disclosures on PHS projects, and training and public disclosure requirements

- COI in Research policy continues to apply to all FIU faculty, staff and students who wish to engage in research at FIU

- Policy also applies to subrecipients on PHS-funded projects
How do FIU personnel report outside activities and financial interests required by the policy?


- Non-FIU employees (e.g., students, subcontractors, consultants or collaborators) report outside activities/financial interests using the paper form on that same website

- OA/COI Portal questions have been updated to capture new reporting requirements of PHS regulations

- Therefore, as long as all research related questions on the OA/COI Portal are answered (check box 1(j) on first page of Portal) all disclosures will be captured
What outside activities and financial interests must be reported?

- Disclosures are now required from “Investigators” define as anyone responsible for the design, conduct or reporting of research, including collaborators, students, etc.

- Thus, an “Investigator” is not limited to only FIU employees; it could include non-FIU employees such as subrecipients (i.e., collaborators, subcontractors or consultants)

- Investigator disclosures are now due, not as relates to a particular research project, but as they relate to the Investigator’s “Institutional responsibilities” (i.e., teaching, research, research consultation, professional practice, committee membership, etc.)

- Each Investigator must report his/her Significant Financial Interests and those of his/her spouse and dependent children.
What Significant Financial Interests (SFIs) must be disclosed?

- The required SFI disclosures are delineated in the Conflict of Interest in Research policy and are in the following categories:
  - Interest in publicly traded entities
  - Interest in non-publicly traded entities
  - Intellectual Property rights and interests
  - Travel

- SFIs that must be disclosed are those of the Investigator and the Investigator’s spouse and dependent children that reasonably appear to be related to the Investigator’s Institutional responsibilities
Travel Disclosures

- Investigators must disclose certain travel if it is related to the Investigator’s Institutional Responsibilities

- Must disclose travel whether the travel is paid through FIU or not. Travel must be reported both when the Investigator knows the amount paid for the travel and when the travel sponsor arranges the travel and the Investigator does not know the amount paid

- Travel details which must be disclosed are: (1) purpose of the trip, (2) identity of travel sponsor/organizer, (3) destination; and (4) duration

- However, no travel disclosure is required if the travel is paid for by any of the following entities:
  - Federal, state, or local government agency
  - institution of higher education or a research institute affiliated with an institution of higher education
  - academic teaching hospital
  - a medical center
When must outside activities/financial interests be reported to FIU?

An Investigator must report outside activities and financial interests relating to research on the OA/COI Portal:

- no later than when a proposal for a sponsored research project is submitted to DOR for review, and
- annually, by September 30, after the initial disclosure
- within 30 days of the Investigator discovering or acquiring (e.g. through purchase, marriage, or inheritance) a new SFI
How are disclosures reviewed in DoR?

- Review process for non-PHS proposals/awards has not changed

- For PHS proposals, process has been revised to comply with new PHS requirement that the University’s Designated Official (VP for Research) must determine if there is a financial conflict of interest for a PHS proposal. That determination requires a 2 step process:

  1. Are the disclosed SFIs related to PHS research (i.e., could the SFI be affected by the research, or is in an entity whose financial interest could be affected by the research)?

  2. Is there a FCOI (i.e., could the SFI “directly and significantly” affect the design, conduct, or reporting of the PHS-funded research)?

- New ePRAF COI questions start the process
DoR Conflict of Interest Review
1. ePRAF will direct Investigators on PHS proposals to complete new PHS Investigator Report of Financial Interests in Research form on DOR website (http://research.fiu.edu/forms/proposalPreparation/financialInterest.pdf)

2. Form contains questions for DOR to be able to determine if any disclosed SFI is related to the proposed PHS project

3. If DOR determines that no SFI is related to the PHS project, no FCOI exists and the review is complete

4. If DOR determines that any SFI is related to the PHS proposal, DOR will obtain additional information from the Investigator and/or the OA/COI Portal about the SFI(s) and will provide the information to the VPR for a determination of whether the SFI(s) result in a FCOI for the project
DoR Conflict of Interest Review (cont’d.)
5. If there is a determination that there is no FCOI, no further action is required
6. If there is a determination that there is a FCOI, a management plan must be instituted to manage the FCOI

7. Management plan will be developed with the involvement of the Investigator, his/her Chair or supervisor, Dean and the VPR

8. DoR must report management plan to the PHS agency via eRA Commons.

9. No funds can be expended on a PHS award until FCOI determination is made and disclosure of the FCOI (if applicable) is made to the PHS.
DoR Conflict of Interest Review (cont’d.)

10. When DoR receives an award for a PHS funded project, DoR will email the Investigators on the proposal to inquire if there has been any change to the conflict disclosures since the proposal was submitted. If yes, then the Investigators must update his/her OA/COI Portal disclosures and submit an updated PHS Investigator Report of Financial Interests in Research form to DoR for review.
New Process for Subawardees

- A DOR Subawardee Commitment Form (http://research.fiu.edu/forms/proposalPreparation/subrecipientCommitmentForm.pdfPre-Award) is required for each proposed subawardee (subcontractor, consultant, collaborator) on a proposal to, among other things, determine if the subawardee has its own FCOI policy or will follow FIU’s policy.

- If the Form reflects that the subawardee has its own policy, no further disclosure is required from the subawardee.

- If the Form reflects that the subawardee does not have its own policy, then each subawardee Investigator on the proposed project must: (1) report their outside activities/financial interests to FIU on the paper form found on the HR webpage; and (2) complete the PHS Investigator Report of Financial Interests in Research form. DOR will review the disclosures by the subawardee Investigators in the same manner that DOR reviews the disclosures of FIU employees.
New Training Requirement

- Investigators must complete training on the COI in Research policy and on the PHS FCOI regulations:
  - prior to engaging in any PHS-funded research and
  - at least every 4 years thereafter and
  - immediately if:
    - Investigator requirements in the COI in Research policy change
    - Investigator is new to FIU or
    - Investigator is non-compliant with policy or management plan

- Online FCOI training is available on the DOR website at http://research.fiu.edu/training/trainingCourses.html.

- Investigator training must be up-to-date for any proposals to PHS agencies
Additional New Requirements

- New public disclosure requirement of FCOI of senior/key personnel on the research project within 5 days of receipt of a request. This will be processed by DOR

- Additional requirements for details in a management plan to manage a FCOI

- New requirement for mitigation plan if PHS project began with an unmanaged FCOI due to Investigator’s failure to report outside activity/financial interest or University’s failure to review outside activity/financial interest

- Increased reporting requirements from FIU to PHS

- All delineated in COI in Research policy
Questions?