## Office of Research and Economic Development Quarterly Research Administration Meeting

**January 27th, 2015** 

## Office of Research and Economic Development Quarterly Research Administration Meeting

## **AGENDA**

- Welcome and Introductions
- Vice President's Office
- Pre Award Update
- Budget & Cost Analysis Update
- Research Systems Update
- Research Integrity Update

- Welcoming Remarks
- Introduction of Office of Research and Economic Development
  Team
- Introduction of New Attendees
- Future Quarterly Research Administrators Meeting for 2015
  - April 28, 2015
  - October 27, 2015
  - All meetings are from 10:00 am 12:00 pm in the MARC Pavilion
- Slides will be posted on the Office of Research and Economic Development website after meeting

#### Uniform Guidance

Memo was sent via listserv and posted on website on 12/30/14
 Key Implementation Points:

#### Computers, Software and Data Processing Supplies

- Charging these items as a direct cost to a federal project is allowable if the device is "essential and allocable" to the performance of a federal award.
- As affirming the allocability of these items to grants is still a high-risk activity, FIU will continue to require Direct Charge Exemption Forms (DCEFs) for these items.

#### Administrative & Clerical Support

- In order to direct charge salaries of clerical or administrative staff, the salary must be clearly budgeted and justified in the proposal if it is "essential and allocable" to the performance of a federal award.
- As affirming the allocability of these items to grants is still a high-risk activity, FIU will continue to require Direct Charge Exemption Forms (DCEFs) for these items

#### Uniform Guidance Continued

#### Effort Reporting

 The standards for documenting personnel charges on sponsored projects remain the same. The university will continue to use eCRT for effort reporting.

#### Subrecipient / Subawards

- There is an increased emphasis on the role of the prime award recipient in monitoring the fiscal and programmatic performance of its subrecipients.
- FIU investigators on projects with subrecipients will be required to collect, review and retain subrecipient's programmatic reports as required by the terms of the subaward and continue to review invoices and ensure that the subrecipient is performing work at least equivalent to the charges billed.
- ORED is updating Subawardee Commitment Form to capture additional questions from proposed subawardees to ensure compliance with Uniform Guidance requirements.
- Sponsor prior approval is required to issue a fixed price subaward rather than a cost-reimbursement subaward. Please note that fixed price subawards cannot exceed \$150,000.

### Uniform Guidance - Continued

#### Fixed amount awards

- The new guidance will allow federal sponsors to issue certain awards as fixed amount awards. As with all proposals, applications for fixed amount awards must be based on the cost principles.
- FIU will require that all budgets for all types of awards are built, routed and approved using our internal budget sheet, with key personnel broken out by name and effort commitment.
- Any deviation from the effort commitment, even for fixed amount awards, by 25% or more must be approved by the Sponsor, in writing, prior to the change.

#### Closeout

- There is increased scrutiny on the timeline for closeout of awards.
- FIU has already experienced increased pressure from sponsors to ensure timely closeout of all awards.
- Investigators and administrators are encouraged to monitor charges throughout the life of the award to expedite the fiscal closeout. In addition, PI's are expected to file all technical and invention reports within 90 days of the expiration of the award.

#### Uniform Guidance - Continued

- Procurement
  - Based on an extenstion granted by OMB to institutions of higher learning, through June 30<sup>th</sup>, 2016 FIU will be following procurement standards for sponsored research awards as prescribed in OMB A-110.
  - Procurement standards under the Uniform Guidance are stricter and will require additional documentation from purchasers to adhere to new requirements dividing purchases into the following categories:
    - Micro Purchases
    - Small Purchases
    - Sealed Bids
    - Competitive Proposals
    - Sole Source

#### Uniform Guidance - Continued

- Procurement
  - ORED will work with Purchasing Services on the implementation of the new requirements by July 1, 2016.
  - Professional organizations like FDP and COGR are trying to work with OMB to minimize the administrative burden of these new requirements



#### Uniform Guidance - Continued

- Sponsor Prior Approvals
  - The Government Wide Research Terms and Conditions (formerly known as the FDP Terms and Conditions) are no longer in effect.
  - The federal government is working on having them reinstated.
  - This impacts expanded authority prior approvals that had been granted to institutions, therefore certain actions (rebudgeting, no cost extensions, carry forward) may require sponsor prior approval before being inacted.
- Agency Implementation Plans
  - Sponsors are releasing implementation plans on how they plan to adhere to the Uniform Guidance requirements. We will post them online.
- FIU ORED Uniform Guidance website is available at:
  - http://research.fiu.edu/omb/

#### RACC

- All sessions from the RACC have been transferred online and will be available via Moodle
- A message will be sent via the listserv early next week with the link and instructions.

- The National Science Foundation (NSF) has updated their Proposal and Award Policies and Procedures Guide (PAPPG) effective December 26, 2014 to comply with the changes specified in the Uniform Guidance.
- Several of the key changes announced are as follows:
  - Budget and Budget Justification
    - Have been revised to reflect that the budget justification for the proposing organization must be no more than three pages. For proposals that contain a subaward(s), each subaward must include a separate budget justification of no more than three pages each.
  - Senior Personnel Salaries & Wages Policy
    - NSF amended this section to note that compensation for personnel in excess of two months must be disclosed in the proposal budget, justified in the budget justification, and must be specifically approved by NSF in the award notice budget.

### NSF Update - Continued

- Senior Personnel Salaries & Wages Policy Continued
  - Under re-budgeting authority, an awardee can internally approve an increase in person months devoted to the project after an award is made, even if doing so results in salary support for senior personnel exceeding the two month salary policy. No prior approval from NSF is necessary as long as that change would not cause the objective or scope of the project to change.
- Administrative and Clerical Salaries and Wages The revision clarifies the conditions which must be met in order to consider these costs on an NSF funded project. Please note that institutionally, any requests to directly charge administrative and clerical costs will require DOR prior review and approval via a Direct Charge Exemption Form (DCEF).

#### NSF Update - Continued

- Travel
  - All travel, both domestic and foreign require justification.
- Materials and Supplies
  - The new amended section adds language to indicate that computing devices are considered supply items and may be included as direct costs for devices that are essential and allocable. Please note that institutional procedure for these items need to be followed to document allocability.
- Subawards
  - The Uniform Guidance requires proposing organizations to make case-by-case determinations regarding the role of subrecipients vs contractors.
  - NSF has stated that inclusion of a subaward or contract in the proposal budget or submission of a request after issuance of an NSF award to add a subaward or contract will document the organizational determination required.
- Project Description
  - This section now requires a separate section within the narrative entitled, "Broader Impacts of the Proposed Work."

- Cost Sharing
  - Requires that awards with any mandatory cost sharing must document such cost sharing (on an annual and final basis), the Authorized Organizational Representative must certify that the amount is correct, and the cost sharing must be reported to NSF via use of NSF's electronic reporting systems.
- Program Income
  - The language has been revised to reflect that registration fees collected for NSF supported conferences are considered program income. License fees and royalties for copyrighted material, patents, patent applications, trademarks, and inventions produced under an award are not considered program income.
- F&A Costs
  - Provides updated guidance addressing organizations with and without federally negotiated F&A (indirect cost) rate agreements (e.g., de minimis rate of 10% or less MTDC for entities without a federally approved F&A rate agreement)

- FastLane will begin to run an additional 24 automated compliance checks on proposals to ensure they comply with requirements outlined in the PAPPG, Chapter II.C.2 of the Grants Proposal Guide (GPG).
  - Page Count: Page count rules will be enforced on the following proposal sections:
  - Project Description: 15-page limit [exceptions: 8-page limit for Early-Concept Grants for Exploratory Research (EAGER), and 5-page limit for Rapid Response Research (RAPID)]
  - Budget Justification: 3-page limit for the proposing institution and a separate, 3-page limit for each sub-recipient organization
  - Mentoring Plan: 1-page limit
  - Data Management Plan: 2-page limit
  - Budget: Budget-related checks will focus primarily on proposal duration and requested amount. For example, the system will enforce a maximum requested amount of \$200,000 for a RAPID proposal and \$300,000 for an EAGER proposal.

- Proposal Section: Proposal sections will be enforced by their funding mechanism for Program Announcement, Program Description and other GPG-type funding opportunities. For example, an error message will appear if a Project Description was not provided for an EAGER proposal.
- The checks detailed above will be triggered when the "Check Proposal," "Forward to SPO," or "Submit Proposal" functions are selected by a proposer or proposing organization.
- Depending on the rule being checked, a warning or error message will display when a proposal is found to be noncompliant. If an error message appears, the organization will not be able to submit the proposal until it is compliant.

### NIH Update

- Salary Cap
  - Since 1990 Congress has legislatively mandated a limitation on direct salary for individuals under NIH grant, cooperative agreement and contract awards (collectively referred to here as a NIH grants).
  - Congress continues to restrict the amount of direct salary that can be paid by the NIH on sponsored projects to Executive Level II of the Federal Executive Pay scale. The salary for Executive Level II was increased from \$181,500 to \$183,300 effective January 11, 2015.
  - Effective January 11th, 2015 the NIH 12 month appointment salary cap for applications submitted will be \$183,300. The NIH salary cap for nine month appointments will be prorated to \$136,948.
  - NIH salary cap worksheets have been updated and are available at http://research.fiu.edu/forms/

#### NIH Update

- Biosketch
  - NIH encourages applicants to use the newly published biosketch format for all grant and cooperative agreement applications submitted for due dates on or after January 25, 2015, and will require use of the new format for applications submitted for due dates on or after May 25, 2015.
  - The following are some key features of the new format:
    - Extends the page limit for the biosketch from four to five pages
    - Investigators can outline the central findings of prior work and the influence of those findings on the investigator's field work
    - Investigators involved in Team Science are provided the opportunity to describe their specific role(s) in the work

#### Subawards and Purchasing

- Load funds correctly in the requisition
  - First \$25,000 in category 772951 (category code 95701)
  - Remaining funds above \$25,000 category 772952 (category code 95702)
  - \$25,000 distribution is over the life of the project and is not transaction specific.
- Subaward exemption categories
  - BOG Exemption 18.001 (6)(d) 14, Purchases from firms or individuals that are prescribed by state or federal law, or specified by a granting agency (named in grant).
  - BOG Exemption 18.001 (6)(d), Purchases from a governmental agency, another University or political subdivision
  - BOG Exemption 18.001 (6)(d) 24, Sponsored Research Bid Exemption.

#### Subawards and Purchasing

- Purchase Orders
  - Subawards and modifications should always be processed under the same PO
  - Amendments to the subaward should be treated as a Change Order to the existing PO and not a new PO
  - Attach a copy of the fully executed subaward or modification to an existing subaward in the requisition
- Other subaward items of note
  - Subawards cannot be drafted and executed retroactively or for work already rendered
  - Subawardee Commitment Forms, proof of IRB and any Conflict of Interest documentation is required from the subawardee before subawards can be executed.
- Any question can be addressed to Ana Ruiz or Kristen Rivera

#### Other Reminders

- NSF Responsible Conduct of Research Training
  - A reminder that all undergraduate students, graduate students and postdocs supported by NSF grants need to take the responsible conduct of research training offered online within 120 days of being hired.
  - PIs should ensure that their students and postdocs adhere with this mandate from the NSF.
  - Additional details are available at http://research.fiu.edu/rcr/index.html
- Pre-Award Staffing Update
  - Monique Purnell will be at the BBC on a permanent basis as of February 2<sup>nd</sup>, 2015 to assist with ePRAFs for all BBC based researchers.
  - Monique will be located in Academic One (AC1) Room 304A.
  - Still have three open positions pending to be filled and one member of our staff will be going on maternity leave in February

## Office of Research and Economic Development Budget & Cost Analysis Update

### Effort Reporting Fall 2014 Pre-review and Certification

- Pre-review started 01/23/15
- Certification starts 01/30/15 and all cards to be certified & processed by 03/02/15

#### Effort Reporting Ecrt System Upgrade

- Planning for Spring 2015's certification to take place in upgraded system version
- More information to come on this....

### Chart of Accounts Redesign Finalized

- All F&A, Residual, Misc IDs converted from activity numbers in funds 651 & 652 to non-sponsored project IDs in funds 653, 654 and 655
- Crosswalk and details sent to all departments & colleges

### No Change in Form Routing for Non-Sponsored Project IDs

- Check ID fund # before routing forms...those in funds 653-655 are not grants
- Recharge Center Reviews During Annual University Budget Process
- Importance of Capturing Organizational Department IDs Accurately
  - Department IDs (former Organizational Dept IDs) Drive Many Processes
  - F&A Return Calculations to Colleges/Centers Driven by Department ID of Grant
  - Incorrect Department ID Can Impact Center's F&A Return
  - Once Grant is Setup Department ID Can't be Changed
  - No Retroactive Corrections to F&A if Department is Incorrectly Setup
  - Important that Centers and Deans Initially Review Department IDs for New Awards
  - For Questions email <u>f-and-a@fiu.edu</u>

### PantherSoft Financials 9.2 Upgrade

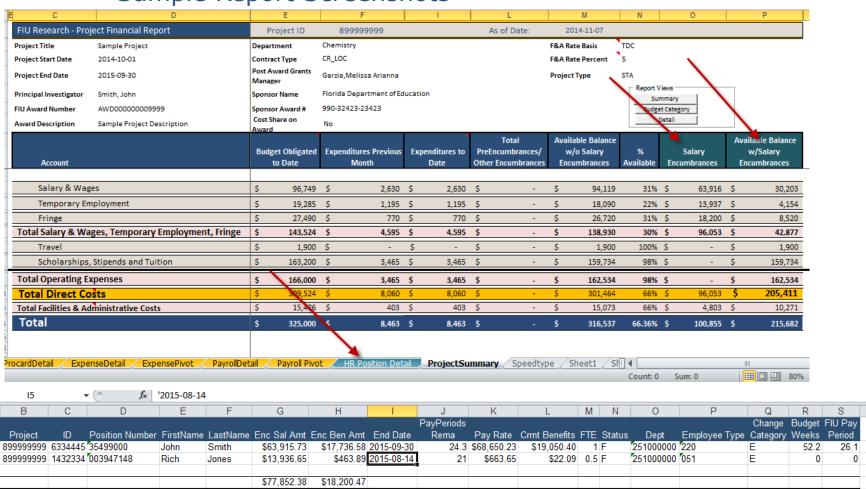
- Upgrade completed successfully in beginning of January.
- For more details about the upgrade including training and upgrade related news, please review the January PantherPost Newsletter on the Office of the Controller website: <a href="http://finance.fiu.edu/controller/">http://finance.fiu.edu/controller/</a>

### Salary Encumbrance Data for Grants

- Initial testing conducted in Fall 2014, however further rollout postponed until after 9.2 upgrade.
- Currently updating financial reports to include new Salary encumbrance totals and details tabs.
- Communications to be sent out to departmental administrators in February with data for user acceptance testing.

### Salary Encumbrance Data for Grants (cont'd.)

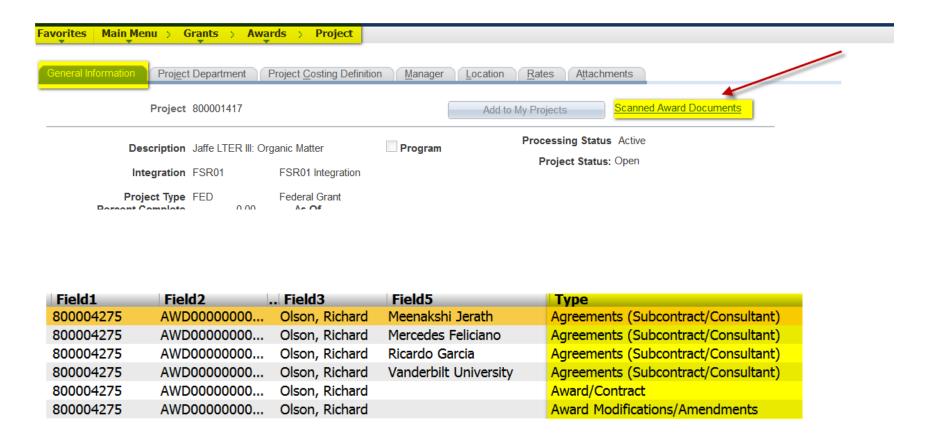
Sample Report Screenshots



#### Linking PeopleSoft to Scanned Award Documents

- Implemented this month a hyperlink in PeopleSoft to scanned Award documents in the Imagenow system.
- Who has access?: Those individuals listed on the project team and to the Award PI. Future enhancement in progress with UTS to grant access based on Department's Post Award Administrator.
- What documents are available?:
  - Award / Contract
  - Agreements (Subcontract / Consultant)
  - Award modifications / Amendments
- What is the navigation to the link?
  - Grants > Awards > Projects > General Information
  - The link is called 'Scanned Award Documents' and can be found on the upper right hand corner of the screen:

Linking PeopleSoft to Scanned Award Documents (cont'd.)



#### Linking PeopleSoft to Scanned Award Documents (cont'd.)

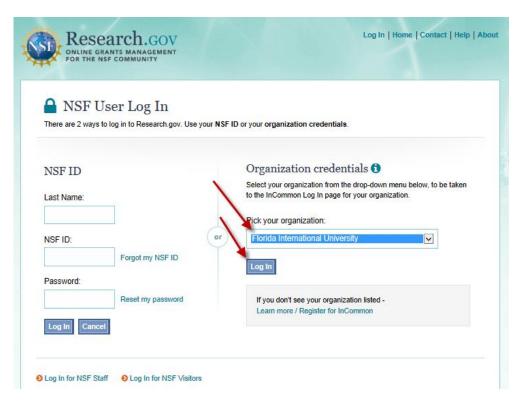
- Important Points:
  - The link is available to members of the project team.
    This data is populated based on EPRAF data and maintained by the Post Award Grants Manager.
  - May need to adjust browser to allow for pop-ups.
  - May need to install Java if not already done so.

### Research.gov Incommon Authentication

 Launched the ability for FIU users to link and log on to their Research.gov accounts with FIU Active Directory credentials.



Research.gov Incommon Authentication (cont'd.)



• <u>Note</u>: The initial attempt to log in to Research.gov via the Incommon authentication requires that the user link their FIU credentials to their NSF ID. Please contact <u>preaward@fiu.edu</u> to obtain an NSF ID.

### Student/Faculty Agreement Template for Human Subject Research

- The agreement outlines the responsibilities of the student researcher and is signed by both the student and faculty advisor
- The agreement focuses on compliance with IRB approved procedures, management of data, required notifications, and required trainings
- The use of this agreement is optional and it does not need to be submitted to the IRB for review
- http://research.fiu.edu/irb/documents/FacultyStudentAgre ementTemplate.doc

### Updated NIH Definition of Clinical Trial

- Old Definition: "A prospective biomedical or behavioral research study of human subjects that is designed to answer specific questions about biomedical or behavioral interventions (drugs, treatments, devices, or new ways of using known drugs, treatments, or devices)."
- New Definition: "A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on healthrelated biomedical or behavioral outcomes."

### Updated NIH Definition of Clinical Trial (Continued)

- Purpose of Update: The revised definition is designed to make the distinction between clinical trials and clinical research studies clearer and to enhance the precision of the information NIH collects, tracks, and reports on clinical trials.
- http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-015.html

- NIH Releases Draft Policy on the Use of a Single Institutional Review Board for Multi-Site Research
  - <u>Commenting Period</u>: NIH is currently soliciting comments through January 29, 2015
  - Purpose of Draft Policy: To streamline the IRB review process and reduce inefficiencies and redundancies while maintaining, and possibly enhancing, protections for research participants
  - http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-026.html

#### 2015 Edition of the International Compilation of Human Research Standards

- Released by the Office for Human Research Protections (OHRP) and features over 1,000 laws, regulations, and guidelines on human subject protections in 113 countries
- Six new countries are included in the 2015 edition: Ghana,
  Guinea, Liberia, Malaysia, Saudi Arabia, and Sierra Leone
- Investigators should plan ahead when proposing to conduct international research with human subjects, since foreign requirements might cause delays in the IRB review process
- http://www.hhs.gov/ohrp/international/

## Office of Research and Economic Development Closing Remarks / Adjournment

### Closing Remarks

- Questions
- Adjournment