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Hot Topics in Research Administration Program

March 18, 2013

Program Sponsored by:

Mike Ludwig
Sponsored
Program
Services

Pete Dunn
Office of the
Vice President
for Research

Chris Martin
Business Services
Business Managers

Planning Committee:
Andrew Bean
Cherise Hall
Amanda Hamaker
Jessica Lawrence
Mike Szczepanski

Welcome

Chris Martin, Director, Business Managers

Federal & University updates

Mike Ludwig, Director, Sponsored Program Services

➢ *OMB Proposed Uniform Guidance on Grants*
➢ *Future Federal funding forecast*
➢ *ARI (Applied Research Institute) update*

OVPR Initiatives

Jeff Bolin, Associate Vice President for Research

➢ *Research Equipment and Incentive Grant Programs*
➢ *Research Bridge Program*

Regulatory Hot Topics

Pete Dunn, Associate Vice President for Research
Director of University Research Administration and Compliance

➢ *Financial Conflict of Interest update*
➢ *Regulatory Items of Interest*

Howie Zelaznik, Associate Vice President for Research

➢ *Central Management of Animal Facilities*

Video of Research at Purdue (if time permits)

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➢ **Purdue Audit Experiences –** A discussion of items identified in recent audits conducted at Purdue and how these items are addressed in daily research administration.   STEW 218 A/B

Coordinator:	Cherise Hall, Director of Financial Affairs ,College of Agriculture
Facilitator:	Beth Siple, Assistant Director of Financial Affairs, College of Agriculture
	Tom Wright, Sr. Operations Manager Research Quality Assurance, VPR

➢ **Contracting Process –** A panel discussion of commonly experienced challenges in the contracting process. This discussion will highlight the issues which can lead to prolonged contract and subcontract negotiations, why these issues are important to the university and local departments, and steps individuals can take to increase the efficiency of the contracting process.   STEW 218 C/D

Coordinator:	Andrew Bean, Assistant Director of Financial Affairs, College of Eng
Facilitators:	Jeff Kanable, Assistant Director of Contracting, SPS
	Kim Gascho, Pre-Award Center Manager College of Engineering, SPS
	Susan Corwin, Post-Award Sr. Account Manager, SPS

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➢ **eRA Enhancements –** View a showcase of the recent upgrades and enhancements to Coeus and the SAP Grants module. Ensure that you are utilizing AIMS to its fullest potential.   STEW 214 D

Coordinators:	Jessica Lawrence, Assistant Director Post-Award, SPS
	Amanda Hamaker, Assistant Director Pre-Award, SPS
Facilitators:	Amy Wright, Pre-Award Center Manager Ag/Vet, SPS
	Allison Harris, Sr. Operations Manager, SPS
	Helen Moschinger, Post-Award Sr. Account Manager, SPS

➢ **Colleague Audit Cases –** Audit findings at other Universities will be provided as case studies for group discussion.   STEW 204

Coordinator:	Mike Szczepanski, Director of Research Quality Assurance, VPR
Facilitators:	Kyle Wargo, Post-Award Sr. Account Manager, SPS
	Tammy Emilson, Director of Financial Affairs, School of Science

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Up next......

Mike Ludwig, Director, Sponsored Program Services

Federal & University updates

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OMB Proposed Uniform Guidance on Grants

Administrative Requirements - Revises Circular A-110

- <u>Limits on the Negotiated F&A rate</u> require approval by Agency head and OMB

- <u>Clarifies Subrecipient vs. Contractor</u> definitions/relationship and confirms the institution is the best to make the judgment in classifying the relationship

- <u>Negotiated F&A rate should be passed through</u> from the Pass-through to the Sub, or a de-minimis rate of 10%

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OMB Proposed Uniform Guidance on Grants

Administrative Requirements - Revises Circular A-110

- <u>Monitor the activities of Subrecipients,</u> the new guidance is overly prescriptive. Also, the guidance needs to address relief when the Sub is covered by the Single Audit

- Relate <u>Financial data to performance accomplishments</u> whenever practicable

- <u>Voluntary Committed Cost Sharing is not expected</u> and is not to be used as a factor in the review of applications

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OMB Proposed Uniform Guidance on Grants

Cost Principles – Revises Circulars A-21 and A-122

- Elimination of <u>Dual Role of Students</u> and resulting benefit to Federal research (per A-21, A.2.c)

- <u>CAS and DS-2 Requirements are eliminated</u> though if Federal contracts awarded exceed $25M in a year, DS-2 still is applicable

- Elimination of language; the <u>Cost of Equipment is allocable</u> regardless of the subsequent use of the equipment (per A-21, C.4)

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OMB Proposed Uniform Guidance on Grants

Cost Principles – Revises Circulars A-21 and A-122

- <u>Salaries of Administrative or Clerical staff allowable as a Direct Charge</u> when integral to the project

- <u>De-minimis F&A rate of 10%</u> is available to any entity that does not have a negotiated F&A rate

- A cost item may be excluded from <u>MTDC (and application of F&A rate)</u> when cognizant or awarding agency determines it is necessary to avoid serious inequity

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OMB Proposed Uniform Guidance on Grants

Cost Principles – Revises Circulars A-21 and A-122

- Entities may apply for <u>One-time, 4-year Extension of Negotiated F&A rate</u>

- Compensation-Personal Services (aka, <u>Effort Reporting</u>) and Fringe Benefits; significantly updates Circular A-21, J.10.

- <u>Acquisition Cost/Depreciation</u> on a matching Requirement or for a non-Federal award is not allowed

OMB Proposed Uniform Guidance on Grants

Cost Principles – Revises Circulars A-21 and A-122

- Equipment definition now includes <u>Software</u>

- <u>Computing Devices less than $5,000 allowable</u> as a direct charge when essential and allocable (and even if not solely dedicated) to the project

- <u>Residual Inventory (including computers) of less than $5,000</u> may be retained upon completion of the Federal project, with no obligation

- Costs incurred for <u>Temporary Dependent Care</u> directly resulting from such travel are allowable

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OMB Proposed Uniform Guidance on Grants

Cost Principles – Revises Circulars A-21 and A-122

- <u>Sub-building Metering or an "Effective Square Footage"</u> factor (i.e., weighted research space via an energy use index) replaces the 1.3% UCA (per A-21, F.4.c)

- Eliminates the restriction on moving a charge from <u>F&A to Direct </u>(per A-21, G.8.d)

- The cognizant agency shall <u>formalize F&A Rate adjustments</u>, the actual amount, both dollar and percentage adjusted, and the reason for making adjustments

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OMB Proposed Uniform Guidance on Grants

Audit Requirements (would revise Circular A-133)

- Single Audit threshold increased to $750k

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Future Federal funding forecast

- *Office of the Vice President for Research - Sequestration News:* *http://www.purdue.edu/research/vpr/*

- *SRA International – Sequestration Resource Center:* http://www.srainternational.org/sra03/template/tntbAB.cfm?id=5632

ARI (Applied Research Institute) update

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Up next……

Jeff Bolin, Associate Vice President for Research

OVPR Initiatives

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Research Equipment Programs

Why?

- Equipment & infrastructure support are essential to the advancement of research

- Sponsored programs and other sources satisfy many of the needs, but not all

- Many moderate-cost items are hard to fund

GAP

Affordable by PIs, Dept. ⟷ Potential for fed. award

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Research Equipment Programs

Two programs in FY2013

- Laboratory Research Equipment Program
  - Amount per award limited to $100K;
  - No match; No computers; Not for core facilities

- Non-laboratory infrastructure
  - Tier 1:   awards limited to $5K
  - Tier 2:   awards in the range of $5-20K

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Research Equipment Programs

Outcomes

- Laboratory Research Equipment Program

  — 71 applications from 8 colleges requested $4.8M

  — 19 funded for $1.3M; 7 colleges

- Non-laboratory infrastructure

  — Tier 1: 17 applications for $65K; 15 funded, $55K

  — Tier 2: 10 applications for $156K; 9 funded, $142K

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Research Equipment Programs

Future

- Laboratory Research Equipment Program

    — May or may not recur in FY14 or later years

- Non-laboratory infrastructure

    — Will recur in FY14; thereafter uncertain

- Equipment for Core Facilities

    — Hope to support by a recurring program

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FY13 Research Incentive Grant Programs

Why?

- Purdue has strong support for projects that are competitive for external funding and for many new investigators

- Support to develop the new project ideas of established investigators is sparse

- Supporting new, emerging research bridges to future sustainable success

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FY13 Research Incentive Grant Programs

Category I: Interdisciplinary Challenges

- Support collaborative interdisciplinary teams

- Building to sustain external support

- Investment: up to $300K for two years

  — 105 applications for $29.2M; 470 investigators

  — DELAYED: Still struggling with review

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FY13 Research Incentive Grant Programs

Category II: Single Disciplinary Efforts

- One or more investigators

- Building to sustain external support

- Investment: up to $100K for two years with additional support from department/college

  — 47 applications for $4.5M; ~70 investigators

  — 11 awards; ~$1.1M; 10 colleges; 16 investigators

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Research Bridge Program

Why?

- Federal funding trends here and nationally show an increase in declined proposals

- Short term funding gaps can have long term consequences – loss of key staff, for example

- The Bridge program seeks to reduce the long term damage

- "… maintain research programs at a minimum "essential" level for a limited time to facilitate success in re-securing external funding"

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Research Bridge Program

Overview

- Awards will be commensurate with minimal funding levels to sustain a program based on a review of funding history and potential for future funding

- A single, non-recurring award is anticipated

- Any funds not expended by the end of the award period will be returned to the sources

- OVPR Bridge Program requires 1:1 match

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Research Bridge Program

Details

- Best to go to original source materials on OVPR web pages

  - https://www.purdue.edu/research/vpr/bridgefunding/index.php

  - https://www.purdue.edu/research/vpr/bridgefunding/faq.php

- Primary OVPR contact: Mary Millsaps

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Hot Topics in Research Administration Program

Up next……

Pete Dunn, Associate Vice President for Research Director of University Research Administration and Compliance

Regulatory Hot Topics

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Research-related Financial Conflict of Interest

Policy III.B.2: Individual Financial Conflicts of Interest
(effective July 1, 2011)

- Requires that all "investigators" disclose any Significant Financial Interest related to a sponsored project at time of proposal submission, regardless of sponsor

- Investigator = PI/PD and anyone else, regardless of title, who is <u>responsible for</u> proposing, conducting, or reporting research

Revised PHS/NIH Financial Conflict of Interest Regulation
(effective August 24, 2012)

- Applies to all proposals submitted to a PHS agency

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Research-related Financial Conflict of Interest

PHS/NIH Financial Conflict of Interest Regulation

New requirements:

- Investigator disclosure of Significant Financial Interests related to "institutional responsibilities" at time of proposal submission

- Revised definition of Significant Financial Interest: lowered threshhold, includes third-party sponsored/reimbursed travel

- Investigators must complete tutorial on financial conflict of interest prior to expending PHS/NIH funds

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Research-related Financial Conflict of Interest

PHS/NIH Financial Conflict of Interest Regulation

New requirements:

- Increased information reported to NIH and made accessible to public for conflicts of interest

- Increased Purdue responsibility for oversight of subrecipients

- More explicit requirements for institutional response to investigator non-compliance

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Research-related Financial Conflict of Interest

Revised PHS/NIH Regulation

Implementation:

- Revised Policy III.B.2

- Revised Conflict of Interest website:
  http://www.purdue.edu/research/vpr/rschadmin/coi/index.php

- Revised Proposal-Driven Disclosure System

- Explain new requirements to Purdue community; Gold "bookmark" developed and distributed

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Research-related Financial Conflict of Interest

Revised PHS/NIH Regulation

Implementation:

- Track completion of education requirement for existing and new awards

- Instructions for public request for information (website)

- Monitor requirements for every proposal and award; report to NIH Commons when necessary

- Additional non-profit sponsors have adopted PHS/NIH requirements

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Research-related Financial Conflict of Interest

Metrics

As of beginning of March 2013:

- 6560 proposals submitted under Policy III.B.2 and revised PHS/NIH requirements (since July 1, 2011)

- 2541 awards received

- 235 investigators have disclosed SFIs

- 545 PHS investigators have completed financial conflict of interest tutorial (since August 24, 2012)

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Research-related Financial Conflict of Interest

Issues

- Identifying "investigators"

- Collecting all disclosures of SFIs prior to proposal submission

- Explaining what is an SFI; disclosure of sponsored/reimbursed travel (relationship to Concur)

- Monitoring requirements at proposal, award, non-competing renewal

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Public Access to Results from Federally Funded Research

Background:

- 2007: Congress mandated in NIH appropriation that results from NIH funded research must be publicly available

- 2008: NIH implementation. All peer-reviewed publications reporting NIH funded research must be deposited in public repository (PubMedCentral/NLM) within 1 year of acceptance for publication

- 2010-2012: OSTP gathers data on impact of extending requirement for public access to all federally funded research

- 2012: NIH announces new procedures to monitor compliance; beginning in 2013, will delay awarding of non-competing renewals if all publications described in progress report are not deposited on time

Regulatory Items of Interest

What's new?

- February 2013: Legislation introduced into both houses of Congress to extend NIH public access requirement to all federally-funded research

Regulatory Items of Interest

What's new?

- Feb 22, 2013: OSTP directs each Federal agency with over $100 million in annual conduct of R&D expenditures to develop a plan, within 6 months, to support increased public access to results of research funded by the Federal government

  – Plan must be implemented within current budget and must provide free public access to all peer-reviewed publications describing results from Federally-funded research within 12 months of publication

  – Plan must also maximize access by the general public, without charge, to digitally formatted scientific data created with Federal funds

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Hot Topics in Research Administration Program

Up next……

Howie Zelaznik, Associate Vice President for Research

Regulatory Hot Topics

Central Management of Animal Facilities

Individual departments, and even laboratories were responsible for care of laboratory animals

We are talking about husbandry

- Bedding

- Enriched environment

- Feed

- Temperature and humidity

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Central Management of Animal Facilities

However,

- The university is responsible to:

    - Department of Agriculture

    - Health and Human Services

- The university has to maintain an accreditation

Central Management of Animal Facilities

And,

- Our laboratory animal program inspects and oversees all of these operations

- But …. we do not hire, pay, or supervise the animal husbandry

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Central Management of Animal Facilities

Until recently,

- about two years ago, Pete Dunn with Dr. Bill Ferner (Veterinarian and Director of the Laboratory Animal Program) began the process of moving most of our animal care to,

- Centralized Animal Program care

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Central Management of Animal Facilities

Advantages

- Central response to changing regulations

    – Most costs will be absorbed by LAP

- Consistent training and oversight of animal care personnel

Central Management of Animal Facilities

Biggest Administrative Change

- Animal Care individuals are now employed by the OVPR

- Projects and/or departments are charged a per diem. This is a daily rate for animals, based upon the species

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Central Management of Animal Facilities

Grant budgets

- Animal research – must have a per diem rate and a solid estimate of the number of animals per day over the life of the project

Thank you,

Questions?

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