

Hot Topics in Research Administration Program



Research Compliance at Purdue

November 8, 2013

Panel:
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Mike Szczepanski
Tom Wright

PURDUE
UNIVERSITY

RESEARCH QUALITY ASSURANCE

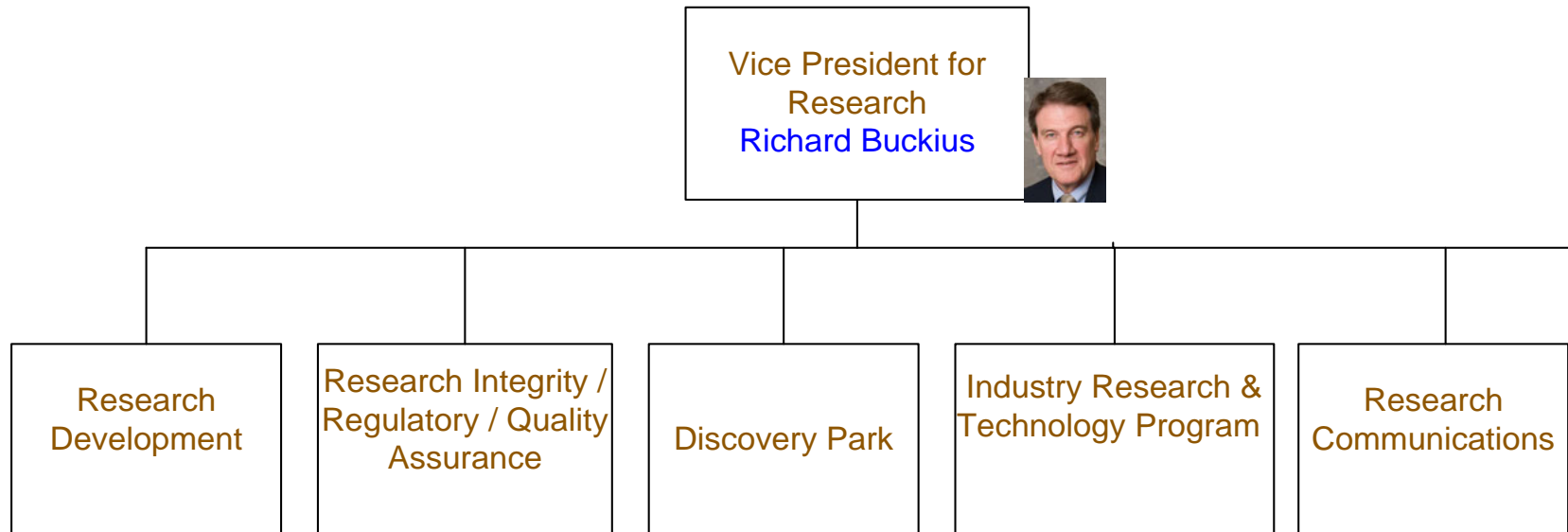
WHO WE ARE,

WHAT WE DO,

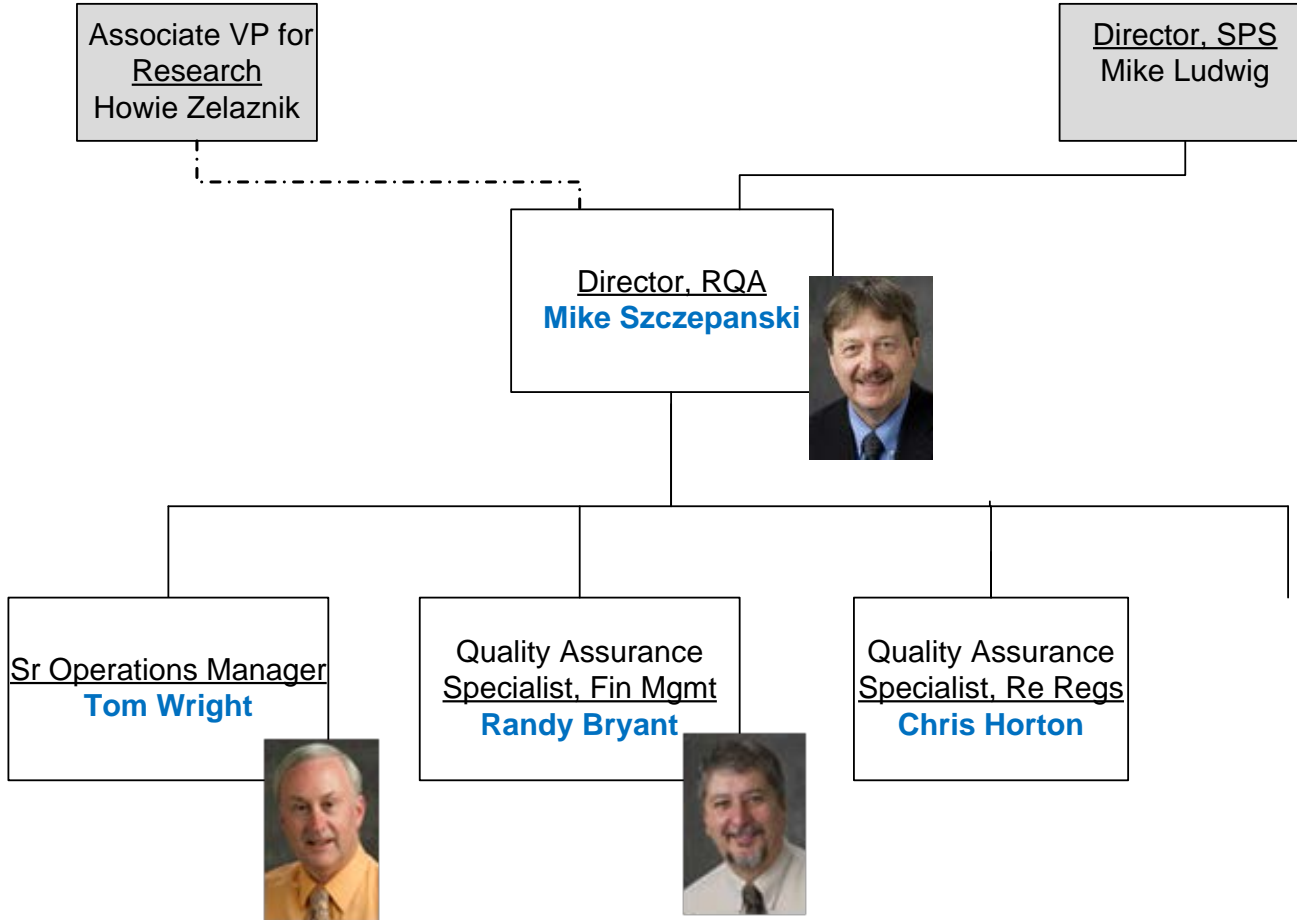
We are

A unit in the Office of the Vice President for Research

Specifically within the Research Integrity /
Regulatory / QA area



RQA Staff



We are on the web at

<http://www.purdue.edu/research/vpr/>

PURDUE UNIVERSITY Office of the Vice President for Research

OVPR Main | OVPR Staff | Contact OVPR

Home **Integrity/Regulatory/QA** Research Development Funding Partnerships Center Support Policies Publications

OVPR ▸ Integrity/Regulatory/Quality Assurance

Research Quality Assurance

The **Research Quality Assurance Unit (RQAU)** reviews and monitors Purdue's research administration and research regulatory compliance practices and provides leadership when conducting comprehensive reviews of the University's compliance activities. The [RQAU staff](#) will coordinate education and training of Principal Investigators, project staff, and departmental and business office staff regarding compliance with federal and state regulation and Purdue policies relating to research.

The RQAU does not assume the duties of the operational regulatory or business areas, and all compliance and sponsored program support activities will exist in their respective reporting structures. The RQAU's role is to monitor these efforts and assess University-wide performance.

RQAU services include:

- [Financial Management Reviews](#)
- [Research Regulation Reviews](#)
- Recommend improved procedures
- Development of [best practice training material](#)
- Provide training to researchers, research administrators, and business offices at Purdue
- Coordinate the response to [audits](#)

Integrity/Regulatory/Quality Assurance

- Conflict of Interest
- Research Integrity
- Research Records
- Responsible Conduct of Research
- Intellectual Property
- Freedom of Inquiry
- Scholarly Communication
- Purdue Hotline
- Regulatory**
- Human Research Protection Program
- Care & Use of Animals
- Biohazards and rDNA
- Radiation/Lasers
- Controlled Substances
- Export Control
- Quality Assurance**
- Financial Management Review
- Research Regulation Reviews

Services we provide

- **Financial Management Reviews**
- **Research Regulation Reviews**
- **Recommend improvements to procedures**
- **Assist with implementation of recommendations**
- **Develop best practice training material**
- **Provide policy training, training materials, etc.**
- **Coordinate the response to audits**



Financial Grant Mgmt Reviews

- **Administrative & Clerical Expense**
 - **Computer Purchases**
 - **Cost Transfers**
 - **Overload Pay on SPS accounts**
 - **Vacation Payout**



Research Regulatory Reviews

- **Animal Exposure Occupational Health Program**
- **Central Animal Ordering Process**
- **Human Subjects – Post Approval Monitoring**
- **Technical Reporting Requirements**



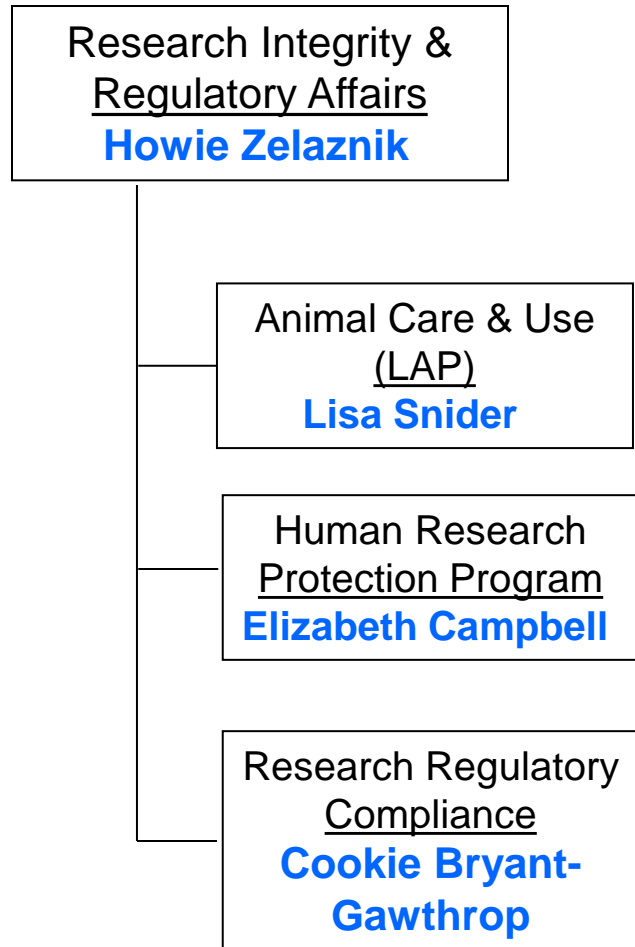
Liaison with auditors



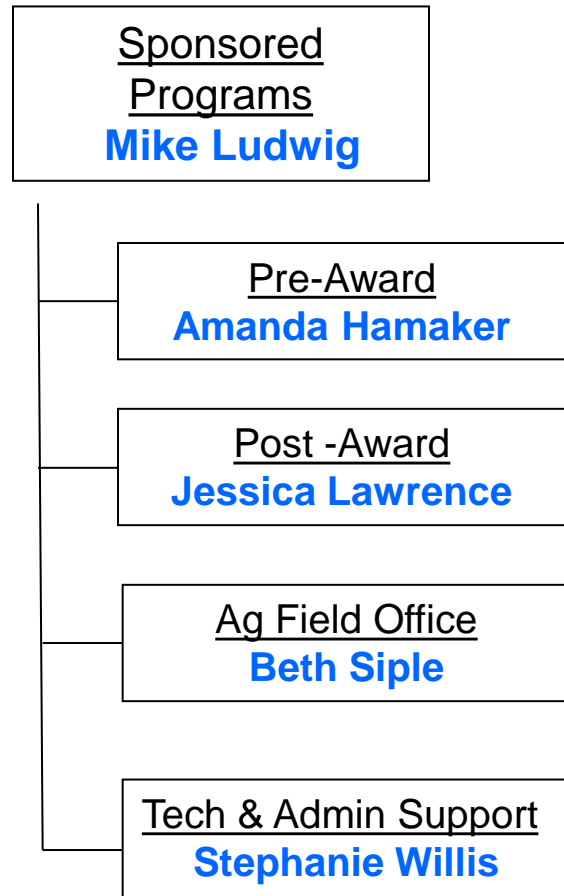
- **Project Closeout Audits**
- **Annual A-133 Audit**
- **Reviews during the life of the project**



Who we interact with...



Who we interact with...



Who we interact with...

Faculty/PI's
Center Directors
Researchers

Research support
staff
Managing Director
Operations Mgrs

Business Office staff
Bus Mgr Liaison
Dept B.O. staff
DP Business Ofc
Purchasing
Costing

Others
Internal Audit



Outcomes

- **Quick Reference Sheet (QRS)**
- **Quick Reference Card (QRC)**
- **Flow charts**
- **Responsibility Matrix**
- **Updated Procedures**
- **Data, Documentation to Auditors**





Project Reviews

Administrative and Clerical Salaries

Sources for Audit Reviews

Annual Office of Audit
Work Plan

FY 2013




National Science Founda
Office of Inspector Ger
November 16, 2012

SUMMARY OF UNIVERSITY AUDITS, SETTLEMENTS AND INVESTIGATIONS RELATED TO FEDERAL PROGRAMS

For Educational Purposes Only



Office of
Inspector
General
**Work
Plan**  FISCAL YEAR
2013



U.S. Department of Health & Human Services
Office of Inspector General

Administrative & Clerical Salary Review

Where will we find federal regulations relating to A&C salaries charged to grants?

Administrative & Clerical Salary Review

Where will we find federal regulations relating to A&C salaries on grants?

OMB A-21:

establishes principles for determining costs applicable to grants, contracts and other agreements with educational institutions

Administrative & Clerical Salary Review

Why are we concerned when we see A&C salaries on grants?

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OMB A-21 Section F.6.b (2)

The salaries of administrative and clerical staff should normally be treated as indirect costs...

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Why are we concerned when we see A&C salaries on grants?

OMB A-21 Section F.6.b (2)

The salaries of administrative and clerical staff should normally be treated as indirect costs...

Direct charging of these costs may be appropriate where a major project or activity explicitly budgets for administrative or clerical services and individuals involved can be specifically identified with the project or activity

Administrative & Clerical Salary Review

Major Projects, as defined by A-21 Exhibit C, include:

- Large complex programs
- Projects involving extensive data accumulation
- Conference planning activities
- Project involving preparation and production of manuals, large reports, etc.
- Project geographically inaccessible to normal dept. administrative support
- Projects requiring project-specific database management

Administrative & Clerical Salary Review

Unlike Circumstances

are associated with the consistent treatment of direct costs and F&A cost on sponsored projects.

F&A costs cannot be charged directly to sponsored projects unless “unlike circumstances” can be justified.

Administrative & Clerical Salary Review

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F&A costs cannot be charged directly to sponsored projects unless “unlike circumstances” can be justified.

Budget justification is critical in documenting “Unlike Circumstances”

Administrative & Clerical Salary Review

Analysis Method:

October 2011

All A&C postings on federal and state projects (incl. fed flowthru)

Each grant file was reviewed to determine if it met one or more of the review criteria:

- The Coeus budget listed the individual or the position
- Sponsor budget page listed the individual or the position
- Budget justification page provided justification for the position or person
- Determine if project met guidance regarding “Major Project”

Administrative & Clerical Salary Review

Recommendation:

For each proposal with A&C salaries, Pre-award needs to ensure the item is budgeted on the sponsors budget and fully justified to the sponsor in order to be charged to the project

Project needs to meet the criteria for “unlike circumstances”