

Essential Compliance Topics in Sponsored Project Administration

Presented by

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The University of Vermont

SPA EDU Offerings

Course Name	PS Course	Facilitators	Scheduled Dates
SPA Seminar: Introduction to Sponsored Project Administration	POL012	Sonya Stern, Julie Macy, Emily Trantum, Linda Serrantonio and Lana Metayer	09/19/18 and 01/10/19
SPA Seminar: Essential Regulatory Compliance in Sponsored Project Administration	POL018	Marcy Whittle and Sonya Stern	09/27/18
SPA Seminar: PeopleSoft Tools and Best Practices for Financial Management of Sponsored Projects	CPT075	Linda Serrantonio and Lana Metayer	10/10/2018 and 04/17/2019
SPA Seminar: Preparation, Review and Submission of Sponsored Project Proposals	POL019	Julie Macy	10/23/2018
SPA Seminar: Award Acceptance for Sponsored Agreements. Establishment of Advance Accounts.	POL020	Emily Trantum	11/13/2018
SPA Seminar: Outgoing Subawards	POL010	Molly Epstein and Linda Serrantonio	12/11/2018
SPA Seminar: Cost Transfers on Sponsored Projects	POL021	Linda Serrantonio and Dawn Caffrey	02/13/2019
SPA Seminar: Cost Sharing on Sponsored Projects	POL022	Julie Macy and Linda Serrantonio	03/19/2019
SPA Seminar: Carrying Forward of Funds From One Year to Another and No Cost Extensions on Sponsored Projects	POL023	Linda Serrantonio and Julie Macy	04/10/2019
SPA Seminar: Sponsored Project Financial Reporting and Closeout	POL024	Linda Serrantonio	05/09/2019
The History of IRB, IACUC and IBC Intuitional Review Boards		Melanie Rocher	02/14/2019
Export Control Regulation in the Context of Sponsored Research		Victoria Jones	TBD
Financial Conflict of Interest on Sponsored Research		Victoria Jones	TBD

Agenda

- Welcome and introductions
- Purpose of the presentation
- Essential compliance topics
- Discussion
- Educational resources available

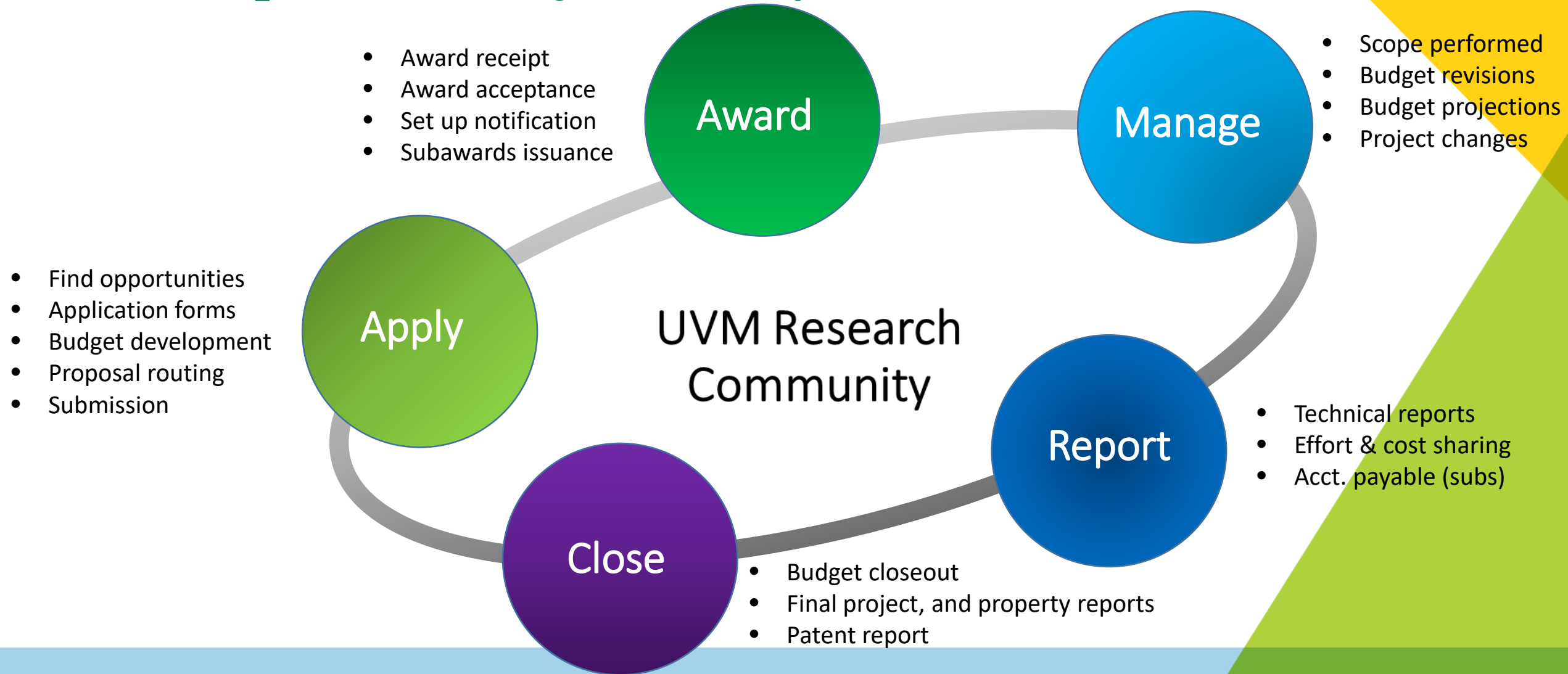
Purpose of the Presentation

- Research Compliance Essentials That Every Principal Investigator and Research Administrative Professional Should Know
- **Overall Objectives:** Provide participants with an overview of compliance requirements related to sponsored projects.
 - Learn about multiple areas of sponsored project compliance
 - Walk through some scenarios and apply the related compliance
 - Roles and responsibilities related to compliance

Essentials that Every PI and RA Should Know

- Research is central to the core mission
- PIs are central to the design, conduct and reporting of research
- PI is responsible for all aspects of research conducted on behalf of the institution
 - Including compliance with institutional policies and terms/conditions of a award
- Scientific and administrative leaders are committed to assist PIs with this responsibility.
- Today we will discuss common compliance areas surrounding research

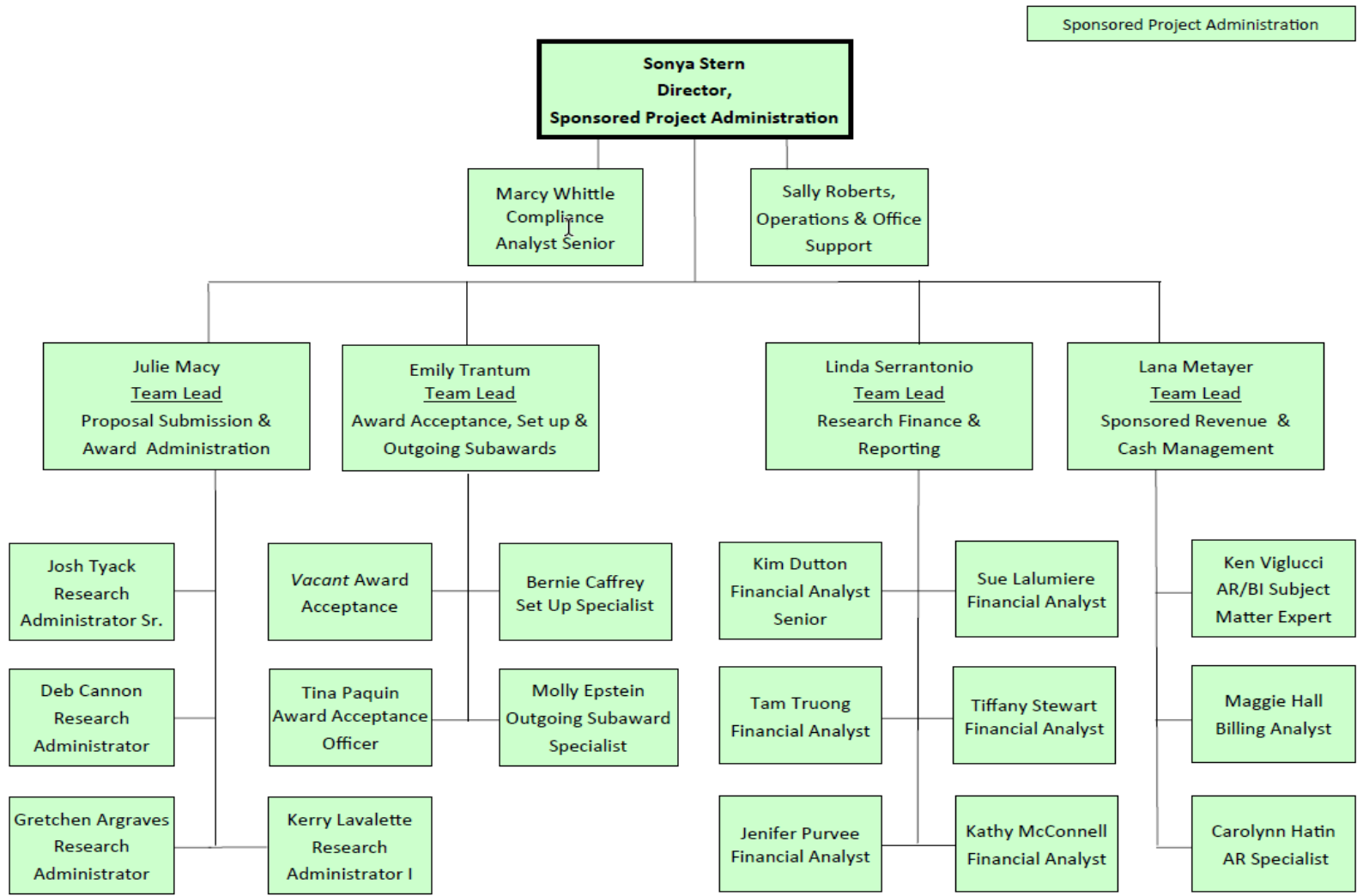
UVM Sponsored Project Life Cycle



UVM Research Community

- **300+** Active Principal Investigators (PIs)
- **100+** Departments with Sponsored Projects from **300+** Sponsors
- **\$130M+** annual volume of awards on **700+/-** award actions
- **300+** subawards issued annually
- Office of Vice President for Research
- Many supporting departments

UVM Sponsored Project Administration Organization



Fundamentals

- Whose grant is this?
 - Awards are made to the institution
- Who gets to call the shots?
 - PIs and administrators form a partnership
 - PIs direct the science
 - Administrators manage the business processes and compliance functions that support research
- Who answers to whom?
 - Science without administration would not receive grant funding
 - Administrators without science would not receive grant funding

Fundamentals: Who is Funding the Research

- Federal
- Non-federal
 - Scientific, non-scientific and private foundations
 - Associations
 - Corporate
 - Industry
 - State, local and other governmental
 - Other institutions

Fundamentals: What Does the Sponsor Look For?

- Principal Investigator Capability
- Quality and Experience of the Research Team
- Project Alignment with Sponsor's Research
- Ability to Carry Out Project
- Past History of Successful Research
- Contribution to the Discipline or Field
- Novel or Unique Project/Innovation

Fundamentals: What Does the Sponsor Look For?

- Priorities/Funding Objectives
- Budget Amount
- Adherence to Guidelines
- New or Young Investigator Status
- Niche Projects
- Need for Pilot Funding
- Sustainability of Project

Research Compliance

Research Compliance: the ability to act according to an order, set of internal and external rules or requests related to the conduct of research

- External drivers
 - Rules, Guidelines, Laws, Policies, Regulations
- Internal drivers
 - Institutional compliance program, Designated officials, Institutional risk management, Written standards of contact, Written policies and procedures, Process for reporting alleged violations of laws and policies, Training and education

Individual Financial Conflict of Interest

- Every investigator should disclose whether they have an outside financial interest related to the individual's institutional responsibilities
- Financial interests include, amongst others:
 - Consulting income (in excess of \$5,000)
 - Intellectual Property income (in excess of \$5,000)
 - Ownership in a company even with a low value
- The institution may assess that a management plan is needed to protect the objectivity of the research and the public trust in the research results

Institutional Review Board

- All research involving human subjects must be reviewed by the UVM IRB.
 - The CHRMS committee is tasked to review medical research and the CHRBSS committee reviews behavioral and social science research.
- The IRB is composed of an academically diverse set of faculty and community members from UVM and UVMMC.
- The IRB meets once a month so give yourself plenty of lead time

Institutional Animal Care and Use Committee

- At UVM, >97% of the animals used in research are rats and mice.
- IACUC must review and approve ALL animal use in teaching and research prior to any work with animals.
- The IACUC Committee at UVM consists of scientists, non-scientists, biosafety experts, statisticians, community members, and a veterinarian.

Institutional Biosafety Committee

- The IBC committee is the cornerstone of oversight for research involving recombinant and synthetic nucleic acid molecules here at UVM.
- The IBC Committee at UVM consists of scientists, non-scientists, biosafety experts, statisticians, community members.
- All UVM research involving the use of RNA, infectious agents, biotoxins, select agents and gene therapy must have an approved IBC protocol prior to work being done.

Cost Principles

- Compliance with Federal Cost Principles (Uniform Guidance)
 - Providing appropriate and compliant stewardship of sponsored funds
 - There are consequences for failing to comply
- Anyone authorizing the expenditures of federal funds must understand the cost principles
 - These principles govern costs that may be charged to the government directly or indirectly

Cost Principles, continued

- Any cost charged to a sponsor must satisfy the following:
 - The cost must be allowable as defined by federal regulations and/or by the terms of the particular award
 - The cost must be allocable; the project which paid the expense must benefit from it
 - The cost must be reasonable; the cost reflects what a prudent person might pay
 - The cost must be consistently treated; it treated as direct or indirect cost when incurred for the same purpose in like circumstances

Payroll Costs

- OMB Uniform Guidance requires that institutions have a system of internal controls which provide reasonable assurance that the payroll charges are accurate, allowable and properly allocated.
- Quarterly review of payroll distributions (perspective) and actual charges (retroactive) is an important internal control at the University
- The PI must ensure payroll charged to the award reflect actual work performed by the project staff.

Payroll Costs

- PIs with multiple sponsored projects should carefully monitor payroll distributions
- Appropriate payroll distribution changes should be submitted in a timely manner.
- Effort certification of payroll charges for each fiscal year is required by UVM employees whose payroll was directly charged or as cost share on a sponsored agreement.

Cost Transfers

- Definition
 - Moves costs from one account to another to correct an error
- Charge correctly in the first place
 - Saves wasted effort and rework
 - Minimizes audit issues
- Transfers are allowed in special circumstances

Cost Sharing

- Definition
 - When a portion of the project costs are contributed by the institution
 - Types: mandatory and voluntary
 - Grant restrictions apply to institutional contribution
 - Becomes a binding commitment, if proposal is funded
- Specific criteria apply
- Post award administration
 - Companion account, funding amount, project period, spend at the same rate, report with grant account, maintain documentation

Travel

- Benefit to the project
 - Direct connection to purpose and specific aims of project
 - Meets cost principles
- Conform with grant policy and award special conditions (Fly America, etc.). **Stricter of policies apply**
- Adherence to institutional policy
 - Reconciliation of expenses, itemized receipts, eliminate unallowable, and submission deadlines

Equipment

- Purchases of capital equipment are subject to institutional policy and sponsor terms and conditions
- Equipment purchased using sponsored funds must be necessary for the performance of the project and consistent with policy, regulations and award terms and conditions
- Common equipment classes: scientific, computers and vehicles
- Unit acquisition value threshold: An acquisition unit cost value of \$5,000 or more is a common threshold to classify equipment.

Export Controls

- Identify items/technologies/information that are subject to the US Export Control regulations
 - The UVM Research Compliance Officer (Victoria Jones) can assist
- Manage export controlled items/technologies/information
 - PI Responsibility (the UVM Research Compliance officer can assist)
 - Export can happen on campus (if a foreign person gets access)
 - May require federal approval
- Institutional Policy on Fundamental Research

Audience participation: Other Important Topics



Educational Resources Available - NCURA

The National Council of University Research Administrators (NCURA) strives to make advances in the field of research administration through professional development, the sharing of knowledge, and by fostering a sense of community via multiple venues:

<https://onlinelearning.ncura.edu/> Tutorials, on-line publications, magazine, industry news are available to NCURA members

<http://www.ncura.edu/travelingworkshops/Home.aspx> These workshops are taught by experienced leaders in the areas of compliance, department research administration, global research management, post-award administration and pre-award administration; the expertise depends on the workshop.

<https://onlinelearning.ncura.edu/free-resources> Education available to the public at no cost, NCURA membership is not required

Educational Resources Available - RACC

Research Administrators Certification Council (RACC) is an independent non-profit organization composed of active certified research administrators whose role is to certify that an individual, through experience and testing, has the fundamental knowledge necessary to be a professional research or sponsored programs administrator.

<http://www.cra-cert.org/>

Educational Resources Available – Federal

Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 154 institutional recipients of federal funds and is a program convened by the Government-University-Industry Research Roundtable of the National Academies. Its purpose is to reduce the administrative burdens associated with research grants and contracts. Many institutions utilize FDP's templates, including one for outgoing subawards <http://thefdp.org/default/subaward-forms/>

National Institute of Health publishes YouTube videos which cover all sorts of information relevant to NIH grants <https://www.youtube.com/user/nihgrants>

Educational Resources Available - Other

Some universities have developed educational videos on various aspects of sponsored research administration, which they make accessible to the public. **Vanderbilt University** offers a “Getting Started in Sponsored Research” series of webinars at no cost. <http://www.vanderbiltlinkages.org/gssr-1/>