

Research Administration and Compliance Meeting
Thursday, April 24, 2014, 1:00 – 3:00 p.m.
Larrick Hall, Court End Ballroom A

Agenda

Controller's Updates

- FY15 Fringe Rate

Integrity and Ethics Updates (ORIE)

- AIRS Annual Update

Clinical Research Services Updates (CRS)

- OnCore Update

Sponsored Programs Updates (OSP)

- Staff Update
- OMB Uniform Guidance (with Mark Roberts)
- Updated NIH/AHRQ Policy on Resubmissions
- RAMS-SPOT Status

Grants & Contracts Updates (G&C)

- Staff Update
- ARMICS Forms
- Audit by Assurance Services

Research Administration and Compliance Updates (ORAC)

- Federal Whistleblower Protection Pilot Program
- Final Report Retention
- Controlled Substance Reverse Distribution
- VA-SRA Chapter Meeting, May 16
- Next Year's Meetings

Upcoming Financial Interest
Report (FIR) Annual Update in
AIRS
(due July 1st)

COI Program

4/24/2014

Upcoming Financial Interest
Report (FIR) Annual Update in
AIRS
(due July 1st)

ALREADY???

COI Program

4/24/2014

Annual FIR Updates due July 1

- First AIRS notice to all Research FIR users:

5/19/2014 Monday

Annual Update reminder from VPR after 5/19/2014

- To non-completers:
 - AIRS notice every other Monday (starting 5/19)
 - AIRS notice on 7/1/2014 due date
 - AIRS overdue notice every subsequent Monday til end of July

No on-time completion by July 1st?

- AIRS review cannot occur; COI disposition cannot be conferred
- Protocol or proposal does not progress
- On July 1st, FIR update must be dated 5/19/2014 or later.

Considerations for the Annual Update

- The Annual Update period is open after the first email from AIRS.
- Enter AIRS at <https://airs.research.vcu.edu>.
- From outside VCU, you must first access the VPN (<https://vpn.vcu.edu>).
- When inside the AIRS, click to open or edit your FIR.
 - **Method 1:** When your FIR is in the State *'Open for Edits'*, click the *'Edit Financial Interest Report'* button.
 - **Method 2:** If your FIR is in the *'Active'* State, click *'Open My Financial Interest Report for Editing'* under My Activities.
- You must enter the AIRS to **update** your FIR even if you have nothing to update.**

- Remove (**delete**) Financial Interests from your FIR if dates are over a year from the date on which you are updating (unless required to do the Statement of Economic Interests).

Example: If you received payment on March 16th, 2013 for consulting and today is May 20th, 2014, you should delete the March payment from your FIR.

- If you are removing all interests in one category, you must delete each interest BEFORE changing your response to “no” in the particular category.

- When you are finished with your update, check the box indicating your update is complete AND click Finish.

Your FIR state then moves to 'Active.'



- If you are getting Annual Update reminders after you did your Update, your FIR state is 'Open for Edits.' Go back to your FIR and click through to Finish. Check to ensure your FIR state is 'Active' BEFORE contacting AIRS@vcu.edu for assistance.

How to ensure a timely FIR update:

- Make sure the 'Research FIR' box is checked on the FIR SmartForm (only 'Research FIR' users get the AIRS update email)

1.0 * Which of the following forms were you asked to create or complete?

Research Financial Interest Report

Statement of Economic Interest

- Pay attention to email from AIRS.

- The Annual Update must be within a year of last year's update.

Example:

Last year's annual update occurred 6/5/2014.

This year's annual update must be before 6/5/2014 but on or after 5/19/2014.

- Annual Updates cannot be done before 5/19/2014!

Reminders about AIRS

- FIR must be updated within 30 days of a change in your Financial Interests and/or research relatedness.
- PI designates 'COI investigator'
 - Always the PI;
 - Always a student investigator if a student initiated project

For questions about the FIR or FIR updating

- Go to [Instructions on how to use the VCU Activity and Interest Reporting System \(AIRS\)](#) or contact AIRS@vcu.edu



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April 24, 2014

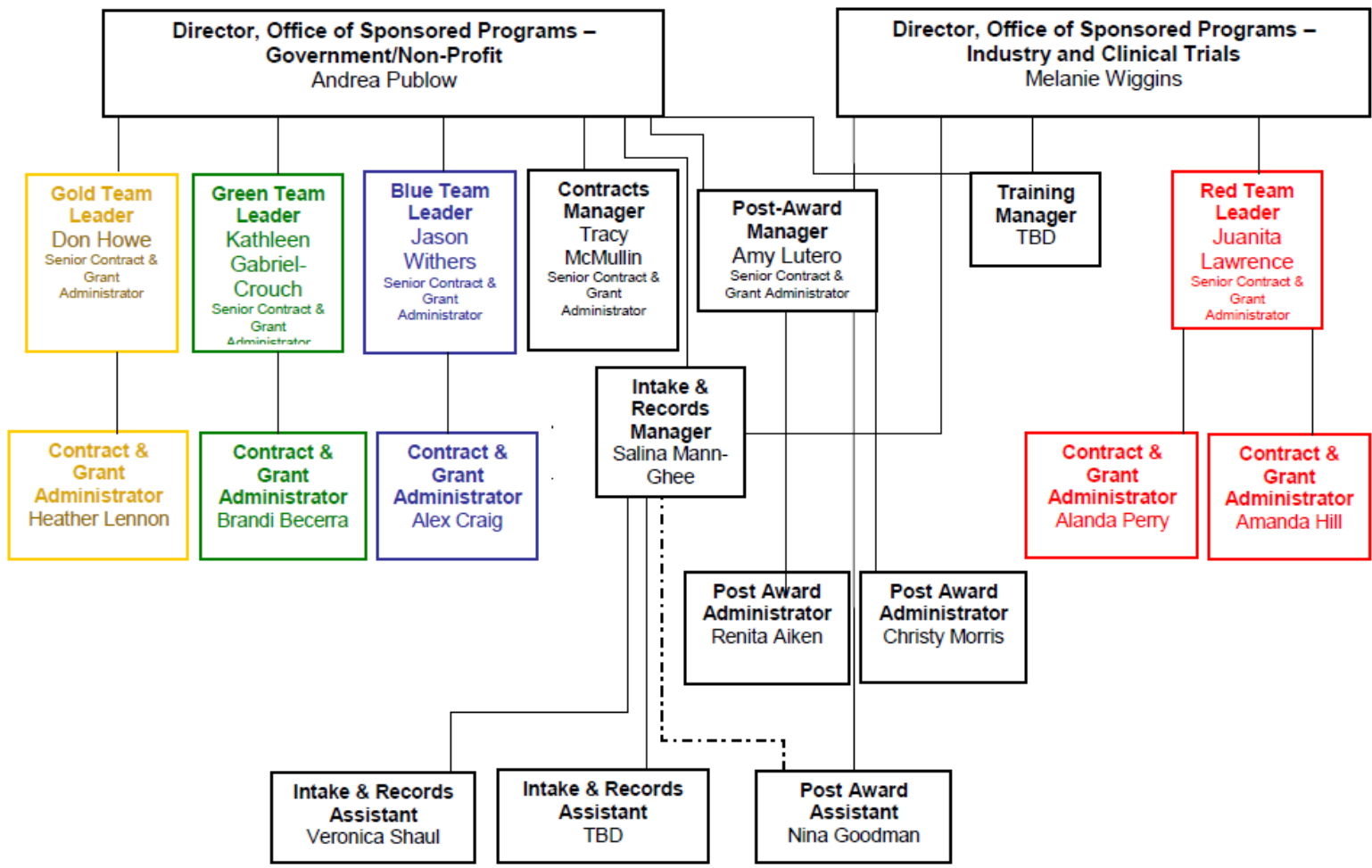
Annie Publow, Director, OSP,
Government/NonProfit

OSP Updates

Presentation Topics:

- OSP Staffing Update
- OMB Uniform Guidance
- Updated NIH/AHRQ Policy on Resubmissions
- RAMS-SPOT –
Development/Implementation Status

VCU OFFICE OF SPONSORED PROGRAMS



April 2014



OMB Uniform Guidance

- Uniform implementation date for all federal agencies: **December 26, 2014**
- Date applies to all requirements except audit. The audit regulations become effective the first fiscal year after implementation, so July 2015 given our July-June fiscal year.
- Every federal agency must submit their implementation plan to OMB June 2014

“Uniform Guidance” will replace:

A-21, A-50, A-87, A-89, A-102, A-110, A-122, A-133

OMB Circular A-21: Cost Principles for Educational Institutions (5/10/2004)

OMB Circular A-110: Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (09/30/1999)

OMB Circular A-133: Audits of States, Local Governments, and Non-Profit Organizations (06/26/2007)

OMB Circular A-87: Cost Principles for State, Local, and Indian Tribal Government (05/10/2004)

OMB Circular A-102: Grants and Cooperative Agreements with State and Local Governments (10/07/1994)

OMB Circular A-122: Cost Principles for Non-Profit Organizations (05/10/2004)

OMB Circular A-50: Audit Followup (09/29/1982)

OMB Circular A-89: Catalog of Federal Domestic Assistance (08/17/1984)

Organizational Overview of Uniform Guidance

| |
|--|
| Section In OMB Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards |
| Subpart A - Acronyms and Definitions |
| Subpart B - General Provisions |
| Subpart C – Pre-Federal Award Requirements and Contents of Federal Awards |
| Subpart D – Post Federal Award Requirements |
| Standards for Financial and Program Management |
| Property Standards |
| Procurement Standards |
| Performance and Financial Monitoring and Reporting |
| Subrecipient Monitoring and Management |
| Record Retention and Access |
| Remedies for Noncompliance |
| Closeout |
| Post-Closeout Adjustments and Continuing Responsibilities |
| Collection of Amounts Due |
| Subpart E – Cost Principles |
| General Provisions |
| Basic Considerations |
| Direct and Indirect (F&A) Costs |
| Special Considerations for States, Local Governments and Indian Tribes |
| Special Considerations for Institutions of Higher Education |
| General Provision for Selected Items of Cost |
| Subpart F – Audit Requirements |
| Audits |
| Auditees |
| Federal Agencies |
| Auditors |
| Management Decision |
| Appendices |

| |
|---|
| Appendices |
| Appendix I – Full Text of Notice of Funding Opportunity |
| Appendix II – Contract Provisions for Non-Federal Entity Contracts Under Federal Awards |
| Appendix III – Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs) |
| Appendix IV – Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations |
| Appendix V – State/Local Government and Indian Tribe – Wide Central Service Cost Allocation Plans |
| Appendix VI – Public Assistance Cost Allocation Plans |
| Appendix VII – States and Local Government and Indian Tribe Indirect Cost Proposals |
| Appendix VIII - Nonprofit Organizations Exempted from Subpart E: Cost Principles |
| Appendix IX – Hospital Cost Principles |
| Appendix X – Data Collection Form (Form SF-Sac) |
| Appendix XI – Compliance Supplement |

Council on Financial Assistance Reform “COFAR”

COFAR website: <https://cfo.gov/cofar/>

- Excellent source of information, webinars, FAQs, and “crosswalk” documents for understanding the changes

VCU's follow up

Committee on the Administration of Research subcommittee appointed to evaluate Uniform Guidance and make recommendations for implementation at VCU

- Led by Annie Publow and Mark Roberts
- CAR member participation by Stacey Garnett (SoN), Robert Houlihan (Massey Cancer Center), Brigette Pfister (College of Humanities & Sciences), Margaret Poland (School of Dentistry), Tricia Zeh and Margaret Phillips (School of Medicine), Sandra White (Purchasing)

VCU Approach

- Evaluating existing circular requirements with VCU existing policies, procedures and responsible parties and identifying the areas changing or staying the same
- Utilizing advisory/professional resources:
 - Council on Government Relations (COGR)
 - National Council of University Research Administrators (NCURA)
 - Society of Research Administrators (SRA)
 - Huron Consulting
- Involving VCU stakeholders as needed
- Providing updates to CAR and RACM
- Updating training materials and/or creating new

Updated NIH/AHRQ Policy on Resubmissions

Background

During the **Enhancing Peer Review initiative**, the NIH and AHRQ reduced the number of allowable resubmission applications from two to one (NOT-OD-09-003; NOT-HS-10-002), and stipulated that any subsequent submission for that project must demonstrate significant changes in scientific direction compared to the previous submissions. Those policies were implemented to address the growing trend for resubmission applications to be scored more favorably, which in essence created a queue for meritorious applications before success in funding. In this extended period of tight funding, this approach resulted in many meritorious research applications being deemed ineligible for additional submissions, and many investigators having to propose substantial changes to productive research programs. New Investigators may have been significantly affected because new research directions may be quite difficult during this phase in their careers.

See more at: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-074.html#sthash.2ItJQ6d7.dpuf>



Updated NIH/AHRQ Policy on Resubmissions

NOT-OD-14-074 and NOT-OD-14-082

"Effective immediately, for application due dates after April 16, 2014:

- Following an unsuccessful resubmission (A1) application, applicants may submit the same idea as a new (A0) application for the next appropriate due date.
- The NIH and AHRQ will not assess the similarity of the science in the new (A0) application to any previously reviewed submission when accepting an application for review.
- Although a new (A0) application does not allow an introduction or responses to the previous reviews, the NIH and AHRQ encourage applicants to refine and strengthen all application submissions."
- See more at: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-082.html#sthash.vbWrg58m.dpuf>

Updated NIH/AHRQ Policy on Resubmissions

NOT-OD-14-074 and NOT-OD-14-082

Options

The updated policy allows an investigator to submit a new (A0) application following an unsuccessful resubmission (A1) application. **The updated policy has no time limit between an unsuccessful resubmission (A1) application and a subsequent, new (A0) application, or between an unsuccessful new (A0) application and a subsequent new (A0) application. The time limit of thirty-seven months between an unsuccessful (A0) application and the subsequent resubmission (A1) application does remain in effect.** The number of submission cycles is not limited, but NIH encourages applicants to update their applications to reflect the status of the field over the interim period and to incorporate new preliminary data, literature citations, letters of reference, etc. as time passes. The updated policy does not preclude submission of a new (A0) application following an unsuccessful new (A0) application, without an intervening resubmission (A1) application.

- See more at: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-082.html#sthash.vbWrg58m.dpuf>



RAMS-SPOT

Research Administration Management System-Sponsored Programs Online Tracking

- Database for sponsored projects administration and submission (Vendor= Click Commerce)
- Will replace “VCUeRA” (Vendor=InfoEd)
- Internal discussions began early 2013
- Currently in development
- All records will be electronic

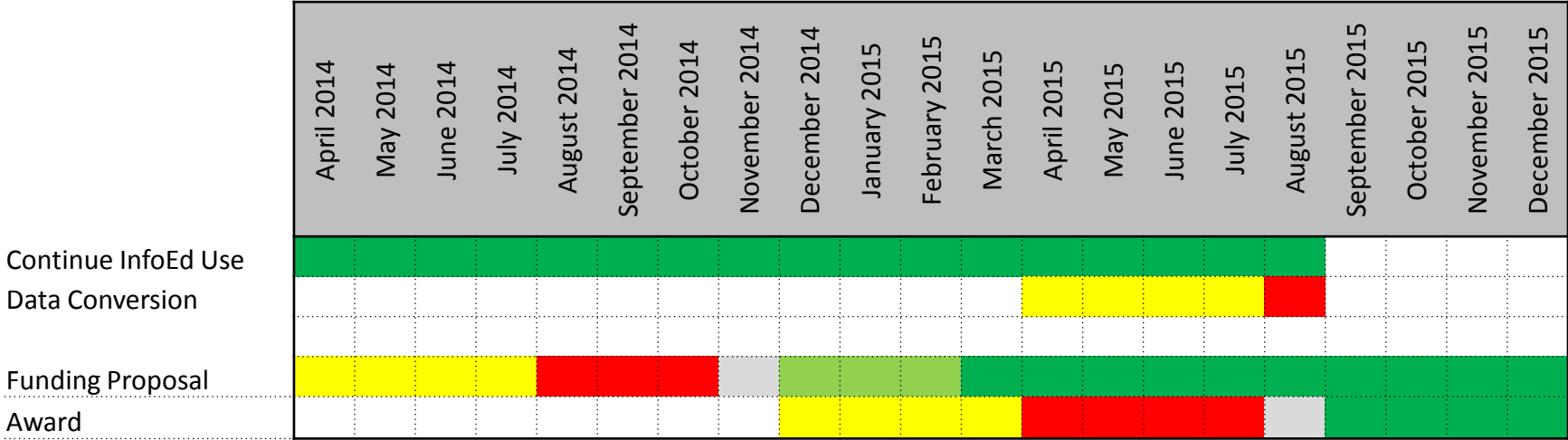
RAMS-SPOT Implementation Timeline

- Phased approach to implementation
 - Proposal submission functionality to transition first
 - Awarding capability to follow
- Affect of Fall 2013 Federal Closure- “Silver Lining”
 - Planned Grants.gov forms change scheduled for January 2014 (which would have required InfoEd upgrade) was cancelled
 - Eliminated our need for short term but time consuming actions in InfoEd
 - Allowed us to stay focused on development discussions

RAMS-SPOT Implementation Timeline

- Two phased implementation
 - Phase 1: Submission of all new of funding proposals
 - Includes all proposals including available Grants.Gov opportunities, industry agreements, Master agreements, Confidentiality Non Disclosure Agreements (CDA), & Letters of Intent (LOI) that require OSP signature/submission
 - Pilot Testing: December 1, 2014 – February 28, 2015
 - Go Live: March 1, 2015
 - Phase 2: Awards and Post Award activities
 - Go Live: September 1, 2015
 - Basic award data from InfoEd will be imported into RAMS-SPOT
 - InfoEd system of record for FY2015 (ending June 30, 2015)
 - RAMS-SPOT system of record for FY2016 (July 1, 2015-June 30, 2016)

SPOT Implementation Timeline



- Pilot Test
- In Production
- Development
- Testing
- Training



**Research Administration and Compliance
Meeting**

April 24, 2014

Grants & Contracts Accounting Updates

G&C staff and misc. updates

- Shavonda Gravely is new Gamma Team Leader
- 90 Day Notice memo under revision
- G&C ARMICS forms on VCUHS
<https://www.pubapps.vcu.edu/vphs/portal/>
- G&C Audit by Assurance Services

VCUQ Effort Reporting

Primary VCUQ employees will be included in the ECRT system and require certification each effort reporting period, effective with the Summer period which will include the pay period starting 5/10/2014.

FY14 G&C Audit 7/1/13 -2/28/14

| # | Documentation Requested | Date Requested |
|---|--|----------------|
| 1 | G&CA Daily Check Logs (including copies of payments and invoices, Banner screen prints, deposit tickets and receipts) for the following dates: July 25, 2013, October 1, 2013, November 22, 2013, January 31, 2014, and February 4, 2014 | 4/16/2014 |
| 2 | Quarterly Suspense Account Reconciliations for Q1 (September) and Q2 (December) of FY 2014 | 4/16/2014 |
| 3 | A/R Aging Reports and all associated communications of overdue billings with grant or contract entities (Past Due Notices) for the months ending July 31, 2013, December 31, 2013, and February 28, 2014 | 4/16/2014 |
| 4 | List of federal grants / contracts whose period of performance concluded during the audit period | 4/16/2014 |
| 5 | List of non-federal grants/contracts whose period of performance concluded during the audit period | 4/16/2014 |
| 6 | Final Monthly Grant Deficit Reports for the months ending July 31, 2013, November 30, 2013, and January 31, 2014 and all communications with departments regarding deficits for those months (emails, memos, support, department responses, and other follow-up) | 4/16/2014 |

FY13 vs FY14 Sponsored Project Expenditures

VCU Expend. at 3/31/2013 - \$ 127,841,395.40

VCU Expend. at 3/31/2014 - \$ 128,697,984.74

Questions???

Thanks for your continued assistance.

Grants and Contracts Accounting/Effort
Reporting

Mark Roberts



Research Administration
And Compliance Update
April 24, 2014

Federal Whistleblower Protection Pilot Program

- 41 USC 4712
- Additional Protections for Employees
- Four Year Pilot Program until January 1, 2017
- Effective July 1, 2013

Purpose

- Employers cannot discharge, demote or otherwise discriminate against an employee for disclosing any of the following:
 - Gross mismanagement of a federal contract or grant
 - Gross waste of federal funds
 - Abuse of authority relating to a federal contract or grant
 - Arbitrary and capricious exercise of authority that is consistent with the mission or successful performance
 - Substantial and specific danger to public health or safety
 - Violation of law, rule or regulations related to a federal contract or grant

Application

- Employees working on a federal grant or contract disclose to
 - Member of Congress or a representative of a committee of Congress
 - An Inspector General
 - The Government Accountability Office
 - A federal employee responsible for oversight or management
 - An authorized official of the DOJ or other law enforcement agency
 - A court or grand jury
 - A management official or other employee of VCU who has the responsibility to investigate, discover, or address misconduct

Protections

- If discharged, demoted or otherwise discriminated against, employees can, within three (3) years of the reprisal, file a complaint with the Inspector General.
- Investigation
- Report issued within 180 days

Findings

- If sufficient basis the complainant has been subjected to a prohibited reprisal
 - Order the contractor or grantee to take affirmative action to abate the reprisal
 - Order the contractor or grantee to reinstate the person to the position previously held, provide compensatory damages (including back pay), benefits, etc.
 - Order the contractor or grantee to pay the complainant an amount equal to the aggregate amount of costs and expenses

Responsibility and Actions

- Notify each employee working on a federal grant or contract in writing of the availability of these extra protections
 - E-mail to all faculty, staff and students from Dr. Macrina semi-annually during four year pilot
 - Information posted on our website
 - Incorporation into our Duty to Report policy
 - Discussion at mandatory staff orientation sessions

Final Report Retention

- Meeting with Library representatives
 - New system – open access
- Review of the requirement:
 - Research: Final Reports – This series documents the completion of research by a college or university employee. This series may include, but is not limited to: final scientific or research report of results. Permanent, In Agency retention.

Analysis

- Final Scientific and Technical Reports
 - May contain Sponsor proprietary information
 - Less than full access
 - Library system would not meet the requirements
 - OSP would be less than successful obtaining final technical reports

You have opened this proposal in view mode

- Proposal PT096252
 - Submissions (1)
 - Competing Continuation
 - Summary
 - Sponsor
 - Personnel (1)
 - Budget
 - Agreements (0)
 - SubContracts (0)
 - SubProjects (0)
 - Communications (0)
 - Attachments (4)
 - Approvals (0)
 - Alerts/Reminders (0)
 - Status History (8)
 - Snapshot
 - Assignments
 - Access
 - Awards (2)
 - Financials (0)
 - Approvals (0)
 - Related Proposals (0)
 - Deliverables (0)
 - Scheduled Payments (0)
 - Keywords (0)
 - Classification Codes (0)
 - Communications (0)
 - Activity Log (0)
 - Attachments (4)
 - Contacts (0)
 - Alerts/Reminders (0)
 - Performance Sites (0)
 - Locations (0)
 - Calendar
 - Relationship Explorer
 - Work Flow

Status History

Status: Effective Date: 24-Apr-2014

Comments:

| Status | Date | Recorded Date | Recorded By | Delete |
|-------------------------------|-------------|-------------------------|---------------------|---------------------------------------|
| Award Destroyed | 06-Dec-2012 | 06-Dec-2012 11:22:41 AM | Ms. Andrea J Publow | <input type="button" value="Delete"/> |
| Award Archived | 06-Nov-2008 | 06-Nov-2008 02:01:48 PM | Patsy A Bindley | <input type="button" value="Delete"/> |
| Award Closed | 27-Mar-2007 | 27-Mar-2007 06:32:42 AM | Patsy A Bindley | <input type="button" value="Delete"/> |
| Award In Closeout | 26-Mar-2007 | 26-Mar-2007 09:19:04 AM | Patsy A Bindley | <input type="button" value="Delete"/> |
| Awarded | 18-Jan-2006 | 18-Jan-2006 04:02:35 PM | Tracy L McMullin | <input type="button" value="Delete"/> |
| Proposal Under Sponsor Review | 16-Aug-2005 | 01-Jan-1900 12:00:00 AM | Geneva James | <input type="button" value="Delete"/> |

Next Steps

- Determination from Assurance Services that Status History meets the requirement (received)
- Determination of how these reports will be stored
- Incorporate into the existing closeout process

Expectation

- Principal Investigators will continue to retain for five years after last action
 - Notes, Work Papers and Technical Data
 - This series documents the data collection for a program/research project conducted by a college or university employee. This series may include, but is not limited to: notes, notebooks, drawings, work papers, technical data, experimental results, statistics, findings, and conclusions.

Controlled Substances: Reverse Distribution

- Registrations continue – 40 or so
- Disposal of Substances
- Met with Guaranteed Returns
 - Reverse distributor for VCUHS
 - Monthly visits
 - Working with them to incorporate “pick-up” of substances from our Registrants
 - More to come later

Next Month and Next Academic Year

- VA SRA Chapter Meeting
 - Friday, May 16, 2014
- Watch for Announcement and Web Update for Next Year's Schedule in mid-May