Research Administration and Compliance Meeting  
Wednesday, April 26, 2017  
Ball Conference Room, BioTech One  
1:30 – 3:00 p.m. – General Research Administration

General Research Administration

- Grant and Contracts Update – Mark Roberts  
  - Awareness of Policy Library updated consolidated Controller Office policy  
  - "Award Acceptance and Establishment"  
  - Upcoming ECRT upgrade timeline  
  - Staff updates
- Office of Sponsored Programs Update – Annie Publow
- Conflict of Interest Update – Monika Markowitz
- Integrity and Compliance Update – You Lee Kim/Quinton Johnson  
  - Sponsored Project and Research Volunteers  
  - Controlled Substances Update  
  - Request for Input - University Space/Medical Procedures  
  - Research Expo 2017
- Export Control Update – Quinton Johnson  
  - Data Management System  
  - Export Compliance International Travel Training

Future Dates for RACM Meetings, 1:30-3:00 p.m., Ball Conference Room, BioTech I
- May 10, 2017 – Clinical Research Compliance
2017 Annual FIR Update in AIRS

Office of Research Integrity and Ethics
Conflicts of Interest (COI) in Research Program
Annual FIR Update in AIRS

- Update period: May 10th-July 1st
  - For all PIs and COI investigators on active or pending proposals or protocols
  - No proposal/protocol progression until annual update completed
  - Annual update required even if no changes
  - Particular circumstances
    - Last update on 5/10/16 and we receive a COI review request on 5/15/17 = over a year old
    - Last update on 11/10/16 and we receive a COI review request on 7/15/17 = outside of update period
    - Last update on 5/10/16 and we receive a COI review request on 7/15/17 = over a year old and outside update period

- COI in Research training (required at least every 4 years) precedes FIR update automatically when due
Notable Changes

• To FIR
  • No SoEI option, just Research FIR
  • FIR questions – text more user friendly

• To COI in Research process
  • Competing Financial Interest (CFI) becomes Competing Interest (CI)
Research and Compliance Meeting (RACM): April 26, 2017

VCU Office of Sponsored Programs
Annie Publow, Director

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Agenda Items

• Research Terms and Conditions (RTC)
• Training Opportunities
• RAMS-SPOT
Federal Research Terms and Conditions

• Hosted on the NSF website: https://www.nsf.gov/awards/managing/rtc.jsp
• NASA, NIH, NSF, USDA, Commerce, EOE (Energy), EPA, ODT, DHS (Homeland Security) participating
• Noteworthy, the agencies not participating including: DOD, State, DOJ (Justice), DoEd (Education), Interior, Fish and Wildlife, Labor, Social Security, HUD, NOAA, Veteran’s Affairs (among others)
• Updating of the RTC, following publication of Uniform Guidance, led by NSF and NIH. Hope is additional agencies will on board to use of RTC.

Note: Reported VCU resadmin listserv March 21, 2017
Research Terms and Conditions

Federal Register Notice - Final Notice of Standard Terms and Conditions for Research Grants

Comments received in response to the request for public comment on the updated Research Terms and Conditions to address and implement the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) issued by the U.S. Office of Management and Budget (OMB) in the Federal Register (80 FR 61049, October 14, 2015)

Federal Register Notice - Research Terms and Conditions to address and implement the Uniform Guidance, 2 CFR Part 200 - October 14, 2015

Research Terms and Conditions Agency Implementation Statements - April 3, 2017

Research Terms and Conditions

- March 14, 2017 (adds by side with Uniform Guidance)

Research Terms and Conditions Appendix A: Prior Approval Matrix - March 14, 2017

Research Terms and Conditions Appendix B: Subaward Requirements - March 14, 2017

Research Terms and Conditions Appendix C: National Policy Requirements - March 14, 2017

Agency Specific Requirements

- DOE - 4/17
- HHS/NIH - 4/17
- NSF - 4/17

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RTC “Overlay” to the Uniform Guidance, 2 CFR §200

• The RTC “Overlay” provides additional instructions or clarifications to the UG
• Cites reference to UG and then the RTC clarification

Example:

<table>
<thead>
<tr>
<th>Uniform Guidance: §200.77 Period of Performance</th>
<th>Research Terms Clarification: §200.77 Period of Performance</th>
</tr>
</thead>
<tbody>
<tr>
<td>§200.77 Period of performance. Period of performance means the time during which the non-Federal entity may incur new obligations to carry out the work authorized under the Federal award. The Federal awarding agency or pass-through entity must include start and end dates of the period of performance in the Federal award (see §§200.210 Information contained in a Federal award paragraph (a)(5) and 200.331 Requirements for pass-through entities, paragraph (a)(1)(iv)).</td>
<td>“Period of Performance” has the meaning given in 2 CFR §200.77, with the additional clarification that the term includes any extension of the end date of the award, such as a no-cost extension authorized by 2 CFR §200.308, paragraph (d)(2).</td>
</tr>
</tbody>
</table>

### RTC Appendix A: Prior Approval Matrix

- The RTC Prior Approval Matrix…example

<table>
<thead>
<tr>
<th>Reference</th>
<th>RTC Overlay</th>
<th>NSF</th>
<th>DOE</th>
<th>NIH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior Written Approval (prior approval)</td>
<td>200.407</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Revision of budget and program plans</td>
<td>200.407</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Incur project costs 90 calendar days</td>
<td>200.308(d)(1)</td>
<td>Waived</td>
<td>Waived</td>
<td>Required</td>
</tr>
<tr>
<td>before the Federal awarding agency makes the award.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initiate a one-time extension of the period of performance by up to 12 months.</td>
<td>200.308(d)(2)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
</tbody>
</table>

Training Opportunity
NCURA Webinar – Research Terms and Conditions
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May 23rd (2pm – 4pm)
Ball Conference Room, Biotech One, MCV

Presenters:
Cindy Hope
• (Assistant Vice President for Research and Director of the Office for Sponsored Programs, University of Alabama)

David Mayo
• (Director of Sponsored Research, California Institute of Technology)

Jean Feldman
• (Head, Policy Office, Office of Budget, Finance & Award Management, NSF)

Michelle Bulls
• (Director, Office of Policy for Extramural Research Administration, NIH)

Register via VCU Training:
https://training.vcu.edu/course_detail.asp?ID=15857
NCURA Webinar – Research Terms and Conditions

• On March 14, 2017, the National Science and Technology Council’s Research Business Models Interagency Working Group issued the new Research Terms and Conditions (RTCs), which are intended to implement the Uniform Guidance (2 CFR 200) and which are now available for use by federal agencies when issuing research awards. When are the RTCs effective? Which agencies will use them? Which agencies have already implemented them? How do I tell if the RTCs apply to an award I have received? Do the RTCs implement any prior approvals or restrictions relative to the Uniform Guidance? How do the RTCs apply to subawards my institution issues? Will participating agencies issue their own implementations of the RTCs, as they did with the previous version?

• Please join us for an informative session in which we will answer these questions.

• Level: Overview
NCURA Webinar – Research Terms and Conditions

Participants will learn:

• When the RTCs (Research Terms and Conditions) are effective
• Which agencies will use them
• Which agencies have already implemented them
• How to tell if the RTCs apply to an award the participant’s institution has received
• Do the RTCs implement any prior approvals or restrictions relative to the Uniform Guidance
• How the RTCs applies to subawards your institution issues
• Will participating agencies issue their own implementations of the RTCs, as they did with the previous version?
Training Opportunity
NCURA Webinar – Data Security
NCURA Webinar – CUI, FISMA & NIST Regulated Research Data

June 15th (2pm – 4pm)
Ball Conference Room, Biotech One, MCV

Presenters:
• Stephanie Gray
  (Assistant Vice President, Division of Sponsored Programs, University of Florida)

• Alicia Turner
  (Business Relationship Manager, University of Florida)

Register via VCU Training:
https://training.vcu.edu/course_detail.asp?ID=15858
NCURA Webinar – CUI, FISMA & NIST Regulated Research Data

Protecting research information and systems from unauthorized access, use, disclosure, disruption, modification, or destruction is a critical component to safeguarding research information and preventing financial loss or damage to the university’s reputation. Protecting confidential information is not only a legal and business requirement, but is also an ethical requirement. Due to increased cybersecurity concerns throughout the world, sponsors are including more stringent requirements for working with restricted data.

CUI, NIST 800-171, 32 CFR 2002, FISMA, HIPAA. What do they mean? How do they impact my University’s portfolio? What should I be doing to comply? This session will describe the basis of the requirements and offer best practices and lessons learned in creating compliant institutions.

Level: Basic
Prerequisites: None
NCURA Webinar – CUI, FISMA & NIST: Regulated Research Data

Participants will learn:

• Participants will understand the basis of the requirements.
• Participants will understand best practices in creating a compliant institution.
RAMS-SPOT Update
RAMS-SPOT Phased Implementation

Phase 3: Subrecipients
- Implemented Subrecipient Project with March 31, 2017 patch
- Working to “back fill” existing subrecipient data
- It’s going well!
- We’ll send announcement when subrecipient actions can be processed by you, will be training

Phase 4: Closeout and Reporting
- Final aspects of RAMS-SPOT implementation
  Refinements to existing underway and will be ongoing
RAMS-SPOT Notes

Reminders:

• All proposals should include a line item budget and a scope of work
  • The scope of work should provide enough specificity that if the sponsor comes back to us to complain about the quality or quantity of work performed, we have good documentation of what we promised to do.

• All proposals should include the originating sponsor program announcement even if our sponsor is another IHE, or a state agency. Especially important when originating sponsor is federal.
RAMS-SPOT Notes

Administrative Actions:

• We are very close to publishing “Get Started” guidance.

• The “hold up” remains school interest in having all clinical trial admin actions route for school approval.

• We’re trying to utilize the system to tag admin actions that are associated with a clinical trial.
RAMS-SPOT Notes

Administrative Actions:
New admin action with March 31, 2017 patch…

“UPLOAD REFERENCE DOCUMENT”

- Intended for correspondence or documentation that is not “actionable” but that rises to the level of being important to the record.
- “Actionable” means it’s a prior approval, or expanded authority, or something we have to sign, or distribute.
- Give your “reference document” a meaningful title.