



UNIVERSITY OF OREGON

April 8, 2013

Memorandum

To: Principal Investigators and Departmental Grant Administrators

From: James C. Bean, Senior Vice President and Provost
Kimberly Andrews Espy, Vice President for Research and Innovation

Re: Immediate Changes to Grant Administration Processes

The University of Oregon recently has been informed that federal grant funds may have been used to compensate individuals at levels in excess of work actually performed through inaccurate FTE allocations, inappropriate use of overtime, or stipends. If true, these practices would constitute violations of federal and/or state criminal and civil law, which carry serious consequences for both the University and its staff. The University has notified federal and state agencies of these concerns and will be working with them to complete a review of these matters.

The University takes seriously its obligations to comply with all laws, rules, regulations, and terms and conditions of awards and contracts. To ensure we meet our collective responsibilities, we are implementing additional measures to confirm the accuracy of personnel and financial information included in all filings made to the government (e.g., grant applications, progress reports, and financial reports). These measures are being implemented immediately and proactively to confirm the integrity of our reports to the government and thereby assure the government of the reliability of the University and its staff.

We will be instituting new processes and protocols in both the Pre- and Post-award areas that will be rolled out this week. Although we will do all we can to make the processes as time-efficient as possible, these measures will necessarily add some time to the processing associated with these activities, as additional materials will need to be provided and new review steps are involved. *Your attention to, and cooperation with, these new procedures and processes is imperative to achieve the desired smooth operation under this new circumstance.*

Effective immediately, **all proposals and any related materials, such as the budget, budget justification, and if applicable, current and pending support statements, must be uploaded into EPCS and the EPCS record FINALIZED at least three business days prior to the external deadline** to allow for the required review of materials by central Sponsored Projects Services staff and an outside consulting firm we have engaged to assist us prior to agency submission. **We cannot guarantee the timely submission of federal filings without adherence to this protocol and its required deadlines. Without full review and assurance of the accuracy of financial and personnel related assertions made in the proposal, the university will not submit said proposal to the external agency.** We recognize that for those of you with external submission deadlines in the next ten

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days you may have concerns about meeting the mandate. Rest assured we are deploying abundant resources so that staff can work directly with you to address our shared goal of meeting submission deadlines. If you have a deadline in the next ten days and you have not yet entered an EPCS record you must do so as soon as possible so you can get into our triage queue.

Sponsored Projects Services will send out a more detailed implementation plan on the new procedures and processes that are specific to the type of filing in the coming week. Sponsored Projects Services has already reached out to those researchers who have immediate external deadlines for implementation.

As noted, we have engaged an outside consulting firm, the StoneTurn Group, to assist us in developing and implementing these measures. As an example, we have developed a protocol for proposals that relies on a checklist to assure the accuracy of the personnel and financial statements/representations made in the proposal. While we will do what we can to minimize the time these processes take, the StoneTurn Group must finalize the checklist verbally with PIs before the proposal can be submitted to the agency. Attached to this email you will find the questions that are being asked when proposals are submitted. In advance of submitting proposals, it may be helpful for you to speak with your departmental grant administrator to obtain/confirm the requested information. In some cases, StoneTurn Group consultants may speak directly with departmental grant administrators and others, as needed.

It is natural that some of these new measures may prompt some questions or concerns about past or current practices. Individuals with questions or concerns are encouraged to discuss them with Doug Park, Associate General Counsel, (dougpark@uoregon.edu; 63082), Moira Kiltie, Assistant Vice President for Research (kiltie@uoregon.edu; 63188), or Analinda Camacho, Senior Associate Director of Sponsored Projects (analinda@uoregon.edu; 62507), as appropriate. It is very important that we address questions and concerns to develop a consistent and compliant set of administrative processes and thereby, collectively and individually, enhance our business operations.

As we gain more experience and receive constructive suggestions from our researchers and administrators, these processes will be revised to become more sustainable. We ask for your patience and attention to this important activity so we can collectively enhance the research mission of the UO.

cc: Michael Gottfredson
Executive Leadership Team
Deans