

Research Administration and Compliance Meeting

Thursday, January 26, 2012

1:00 – 3:00 p.m.

Larrick Hall, Court End B

Agenda

Welcome

General Items/Updates

- NIH Salary Cap – Susan Robb
- Dashboard Update – Tricia Zeh
- Required Training – Investigator and Administrator Training – Jose Alcaine
- Financial Conflict of Interest Update – Monika Markowitz
- Recovery Act Awards – Accelerated Project Completion

OSP Updates

- Staffing Updates

G&C/Effort Reporting Updates

- Staffing Updates
- Fund Assignment Matrix update
- Banner Advance Index Number Request and revised form
- Effort/ECRT Reminders and Updates

VCU Sponsored Project Administration Certificate Presentation

NIH SALARY CAP

Application of new salary cap of \$179,700
January 2012

Notice of Salary Limitation on Grants, Cooperative Agreements and Contracts

- NIH Notice Number NOT-OD-12-035
- First time that the salary limitation has been *reduced*.
- Signed into law on December 23, 2011
- Effective December 23, 2011
- Effect:
 - Salary cap will apply to more individuals
 - Institution will be committing additional cost share for those individuals and for those who were over the previous cap.

Application

- New salary cap of \$179,700 (Executive Level II) becomes applicable to grants when FY2012 funds are awarded on or after 12/23/2011.
- FY2012 funds awarded between 10/1/2011 and 12/22/2011 continue to fall under the previous cap of \$199,700 (Executive Level I).

Examples

- | | |
|--|---|
| <ul style="list-style-type: none">• NIH Grant originally awarded 11/01/2010• FY2012 continuation funds awarded 11/01/2011• Cap remains at \$199,700 until FY2013 funds are awarded | <ul style="list-style-type: none">• NIH Grant originally awarded 01/01/2011• FY2012 continuation funds awarded 01/25/2012• Cap for expenditure of FY2012 funds is \$179,700 |
|--|---|

Example of Calculation

Institutional Base Salary of \$200,000	Old Cap (\$199,700)	New Cap (\$179,700)
Effort at 50%	\$100,000	\$100,000
Charged to Project	\$ 99,850	\$ 89,850
Cost-Share	\$ 150	\$ 10,150

FY 2011 Carryover

- NIH Grant originally awarded 01/01/2011
- FY2012 continuation funds awarded 02/01/2012
- Carryover funds from FY2011 of \$50,000 remain
- New cap of \$179,700 does not go into effect until the \$50,000 carry over has been expended

Carry Over Application

- Determine amount of carry over funds at time of FY2012 award
- Monitor expenditures monthly
- Apply the new cap of \$179,700 in the first month that expenditure of FY2012 funds is anticipated

Carry Over Application Example

- NIH Grant originally awarded 01/01/2011
- FY2012 continuation funds awarded 02/01/2012
- Carryover funds from FY2011 = \$50,000
- Expenditures
 - February 2012 \$18,000
 - Carry over remaining \$32,000
 - March 2012 \$20,000
 - Carry over remaining \$12,000
 - April 2012 \$18,000
 - All carry over expended
- New salary cap of \$179,700 should be applied beginning with the month of April 2012
- Process PAF to reflect new salary cap effective April 2012 as soon as possible, or PHAREDS reflecting changes back to April 2012 no later than June 30, 2012 (60 days)

Questions and Answers

- ◉ A grant was issued on/after December 23, 2011. The award was based on the Executive Level I. Can I rebudget the funds awarded in excess of the new Executive Level II salary limit, or will NIH adjust the award by the difference between the two?
- ◉ It depends on the type of award. If the award is a non-competing award, then grantees may rebudget the funds awarded in excess of the new salary limit. However, if the grant is a competing award, the NIH IC will revise the award when an adjustment for the lower salary limit is needed.

Questions and Answers

- ◉ Can grantees rebudget on FY2012 awards that were proposed using Executive Level I and are awarded on/after 12/23/2011?
- ◉ Executive Level II is effective with awards with an *initial* Issue Date of 12/23/2011 and beyond. For non-competing awards with an *initial* Issue Date of 12/23/2011 and beyond, grantees can rebudget. For competing awards issued on/after 12/23/2011, the ICs will revise the award and adjust the current and all future year commitments to apply Executive Level II when applicable.

Additional Information

- Individuals administering awards with FY2012 funds awarded prior to 12/23/2011 have already been notified
- List being generated identifying those awards anticipating FY2012 continuation funding after 12/23/2011 (to which new cap will apply)
- Tool for tracking carryover funding being developed by SOM

VCU COI program: Status and new developments



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**OFFICE OF RESEARCH INTEGRITY
AND ETHICS
OVPR
1/26/2012**

2011 COI status (very generally)



**71 transactions – most associated with Financial
Interest Report marked 'yes'
(80 in 2010)**

- 11 related to NIH/NSF proposals
- 36 referred to COI Committee
- 15 findings of No COI – either via expedited or COIC
- 27 basic disclosure management plan

NIH COI Rules Changed: August 2011



Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought

(42 CFR Part 50 Subpart F and 45 CFR Part 94)

Implementation date: August 24, 2012

Who do the rules apply to?



- **Investigator** means the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the NIH, or proposed for such funding, which may include, for example, collaborators or consultants.
- **Institutions** must establish standards that provide a reasonable expectation that the design, conduct, and reporting of NIH-funded research will be free from bias resulting from Investigator financial conflicts of interest.

Major changes in the FCOI regulations



Significant Financial Interest (SFI)

- Minimum threshold of \$5,000 - payments **and** equity interests
- Includes **any** equity interest in non-publicly traded entities

Enhanced institutional responsibilities

- All SFIs related to Investigators' **institutional responsibilities**
- Institutions responsible for determining relatedness

'Investigator' Training

- **FCOI training required** for Investigators before engaging in PHS-funded research, every four years thereafter

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Major changes in the FCOI regulations



Travel reimbursements and sponsored travel

Subrecipients on PHS awards to VCU

Public Accessibility of info about COI

Enhanced reporting by institution of FCOI and management to NIH

Mitigation plan if 'bias' uncovered

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Developments in VCU COI program

- Electronic platform for reporting financial interests under development
- Revision of current COI Disclosure form >>>
Financial Interest Reporting Form
- Updates/resources about training, forms, processes continue to appear on COI webpage
http://www.research.vcu.edu/p_and_g/coi2.htm
- Institutional COI policy under development

Policies and Guidelines



Conflict of Interest

Conflicts of Interest exist in many forms and frequently are inherent to the nature of the research enterprise. A Conflict of Interests can arise in situations in which there exists discord between a primary duty and a secondary interest. While such interests can be either financial or non-financial, they, nevertheless, can yield conscious or subconscious bias in the conduct and/or interpretation of research, and, potentially can adversely impact the safety of human or animal research subjects. Often financial Conflicts of Interest will simply present an appearance of compromising an investigator's professional judgment in conducting or reporting the results of research. Accordingly, and whether real or only perceived, all identified conflicts of interests must be addressed.

NEWS FLASH

FINAL RULE ("Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors") regarding financial conflicts of interest in research was published in the Federal Register on August 25, 2011. This document is available as a PDF at: <http://federalregister.gov/a/2011-21633>) Scroll down to 'News about COI' for more information.

VCU UPDATES 8/26/2011

The VCU Research COI Management Matrix offers guidance for COI management plans given different scenarios involving competing financial interests. COI management plans are subject to individual circumstances and are determined by the COI Committee on a case by case basis.

***Click on shaded text below to reveal hidden text.

What are conflicts of interest in research

VCU Researcher Conflict of Interest Policy

VCU Research COI Management Matrix 

VCU IRB Written Policy & Procedure #VIII-10 - Evaluating Investigator Potential Conflicts of Interest

Conflict of Interests Reporting Form 

VCU Research COI Management Matrix

Possible management plan scenarios (subject to individual circumstances)

Directions: Column (1) lists types of competing financial interests an 'investigator' may have in an entity related to, or could appear to be related to, the research to be conducted under the proposed project. An 'Investigator' is an individual who has responsibility for the design, conduct, or reporting of research, regardless of title or role. Column (2) lists recommendations for corresponding 'baseline' COI management for all research. If human subjects research, Column (3) lists management options depending on circumstances. Column (4) lists management options for non-human subjects research, depending on circumstances of competing interests.

Note: The COI Committee makes COI determinations on a case by case basis. The IRB/IACUC may require additional management.

Advance discussion about COI management is encouraged. Contact the COI Committee Chair.

	1	2	3	4
	Type of financial interest with entity sponsoring research or providing products for research (no reporting threshold)	Baseline management – applies to all research	Human Subjects Research –management components <u>in addition</u> to those in column 2.	Non-human subjects – management components <u>in addition</u> to those in column 2.
A	Consulting or speaking relationship with company sponsoring the research	Disclosure in manuscripts/professional communication and to students, trainees	Baseline management for compensation of 0 to \$5,000 in aggregate/year. <i>Recommend</i> disclosure in informed consent form (ICF) – > \$5,000 in aggregate/year. Additional management is required if: a) any 'investigator,' especially PI, is promoting company product used in research, or b) compensation is > \$10,000	Baseline management for compensation of > \$5,000 Additional management is considered if: a) any 'investigator,' especially PI, is promoting company product used in research, b) compensation is > \$10,000

8-2011

VCU Resources about Researcher COI

- **VCU Researcher Conflict of Interests Policy**
http://www.research.vcu.edu/p_and_g/coi_research.htm

Under revision

- **Conflict of Interests Webpage**
http://www.research.vcu.edu/p_and_g/coi2.htm

- **Financial COI – NIH Office of Extramural Research**
<http://grants.nih.gov/grants/policy/coi/>

- **IRB Written Policy and Procedure (WPP) VIII-10**
Evaluating Investigator Potential Conflicts of Interest
http://www.research.vcu.edu/irb/wpp/flash/wpp_guide.htm#VIII-10.htm

- **Contact COI Committee Chair:**
Monika Markowitz, PhD - msmarkow@vcu.edu



ARRA Accelerated Spending

Research Administration and Compliance Meeting

January 26, 2012



OMB Memorandum M-11-34

- Mandate that federal agencies work closely with their ARRA recipients to accelerate spending so that all projects are complete by September 30, 2013
- Federal agencies may request waivers from OMB for specific purposes
 - “Agencies should request waivers sparingly, and they will be granted only due to compelling legal, policy, or operational challenges.”



NIH Implementation Issued 12/13/2011

- Grants that Currently End 9/1/2012 – 8/31/13 and “could” extend beyond 9/30/13 with an automatic no-cost extension
 - Award will be revised to limit the automatic extension authority so that such extensions may not go beyond 9/30/13.



NIH Implementation

- Grants that Currently End 9/1/13 – 9/30/13
 - The eRA Commons No-Cost Extension module only allows grantees to request extensions in one month increments. Therefore, for awards in this category, awards will be revised to remove the automatic no-cost extension provision and replace it with a prior approval requirement.



NIH Implementation

- Grants with Project Period End Dates Extending Beyond 9/30/13
 - Any provision for an automatic extension will be removed and replaced with a prior approval requirement.



NSF Implementation Issued 12/13/2011

- Grants that expire on or before 9/30/13 but are currently eligible for extension beyond 9/30/13 with a Grantee-approved No-Cost Extension
 - Grants will be amended to limit the unilateral extension authority to 9/30/13.



NSF Implementation

- Grants that expire after 9/30/13
 - Grants will be amended to eliminate the grantee-approved no-cost extension authority
 - NSF staff administering these grants will reach out to grantees to discuss possible strategies for accelerating progress and expenditures.



NIH and NSF Implementation

- Waiver circumstances
 - The project is long-term by design and acceleration would compromise core programmatic goals
 - The project must undergo complex environmental review that cannot be completed within the timeframe
 - Contractual commitments between the awardee and vendors/subrecipients legally prevent adjusting the timeline for spending
 - Special circumstances exist where acceleration may cause unnecessary harm or unreasonable risk to vertebrate animals or human subjects involved in the research



NIH and NSF Implementation of Waiver Request

- For any Recovery Act award anticipated to continue beyond 9/30/13, the Grants Management Specialist must be notified in writing that an extension of the final budget period beyond 9/30/13 is vital for completion of the project. A final date must be included in the request
- All requests must be received prior to 6/1/12 so that a waiver request can be submitted to and considered by OMB

VCU OFFICE OF SPONSORED PROGRAMS

**Director, Office of Sponsored Programs –
Government/Non-Profit**
Andrea Publow

**Director, Office of Sponsored Programs -Industry
and Clinical Trials**
Melanie Wiggins

**Gold Team
Leader**
Don Howe
Senior Contract &
Grants Administrator

**Green Team
Leader**
**Kathleen
Gabriel**
Senior Contract &
Grant Administrator

**Blue Team
Leader/ARRA
Reporting
Manager**
Jason Withers
Senior Contract & Grant
Administrator

**Post-Award
Manager**
Amy Lutero
Senior Contract & Grant
Administrator

**Senior
Administrator,
Training & Export
Control**
Jose Alcaine
Senior Contract & Grant
Administrator
(reports directly to Susan Robb)

**Red Team
Leader**
**Juanita
Lawrence**
Senior Contract &
Grant Administrator

**Contract &
Grant
Administrator**
Leigh Sprague

**Contract &
Grant
Administrator**
Georgiana Ball

**Contract &
Grant
Administrator**
Farah Mirza

**Intake &
Records
Manager**
tbd

**Contract &
Grant
Administrator**
Alanda Perry

**Contract &
Grant
Administrator**
Amanda Hill

**Contract &
Grant
Administrator**
tbd

**Post Award
Administrator**
Joshua
Dickerson

**Post Award
Administrator**
tbd

**Research
Administrative
Assistant**
Tarsenna Davis

**Intake & Records
Assistant**
Christy Morris

**Post Award
Assistant**
Nina Goodman

January 2012



Research Administrators and Compliance Meeting 1/26/2012

Update From G&C Accounting/Effort Reporting

Welcome Marquita Crowder

- Welcome to Marquita Crowder
- Grant Accountant-Joined Delta Team on Jan. 3, 2012
- Prior employment as Fiscal Administrator with the VCU Department of Gerontology
- Contact 828-4575 or crowdermd@vcu.edu

Advance Banner Index Number Request Memo(revised)

2. Banner Index Number Request Memorandum

The principal investigator may request an index number while Sponsored Programs Administration is waiting for the formal notice of award from the sponsoring agency. The principal investigator may fax, email or mail the completed memorandum to Grants and Contracting Accounting to secure the index number.

Advance Banner Index Number Request Memo(revised)

Revision date: 1/29/2012



TO: Grants and Contracts Accounting
FROM:
DATE:
SUBJECT: ADVANCE BANNER INDEX NUMBER REQUEST

I have received an unofficial notification from the sponsoring agency listed below that my grant/contract application has been accepted.

Please assign a Banner Index number for the pending grant/contract. Pending the receipt of the executed award notice by CGP, my department will guarantee any expenditure charged against the assigned Banner Index number. The Non-sponsored program Banner number guaranteed to accept charges should the grant not be awarded is _____ (Guaranteed index may be a 2, 4, or 6 ledger index.)

This alternative Banner Index number will be used only if the University does not receive an award notice within 60 days from the sponsor. My department will be responsible to communicate with CGP to minimize delays beyond 60 days.

I have provided the following minimum details required for the grant index create:

OSP PT/ED/CO# _____
Principal Investigator's Name: _____ V# _____
School and Department: _____
Title of Project: _____
Prime Agency Name: _____
Sponsor's Name: _____
Sponsor's Banner ID Number: _____
Budget Period: _____

Advance Banner Index Number Request Memo(revised) page 2

Revision date: 1/20/2012

Project Period: _____

Amount of Award: _____

FIR/Rate: _____ FACS Code: _____

Source of funds(check one): Federal _____ Fed. Flow Thru _____ State _____ Local Gov't _____

Industry _____ Foundation _____ Clinical Trial _____

Fiscal Administrator: _____

Predecessor Org Number: _____

Mandatory Cost Sharing: Yes _____ No _____

Approvals:

Principal Investigator _____

Department Chair/School Dean _____

FOR G&C USE ONLY

*The above pending proposal award data has been verified in InfoEd for accuracy by:

(Accountant Name)

Advance Banner Index Number Request Memo(revised) page 2

Created 12/12/2011 by Grants and Contracts Accounting
last edited 1/19/2012

FUND ASSIGNMENT MATRIX BY TYPE OF AWARD

Award Type	Award Conditions	Reporting Requirement referred to below as (RR)	Treatment
Research			
Federal	...if 1) NIH/EA/NSF, NSF, DOE, ONR, USED, NASA, DOD (these are our primary; may include others)	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
	or		
	unless NIH Grant - O, P, K, T	...then	Budget Period Index
	NIH Cooperative Agreement - O		Budget Period Index
	NIH Grant/Indirect Cost Contract	Cumulative	Single Index
	NIH Fixed Price Contract	Cumulative	Single Index
Federal Flow-through (incl. State, Private, or Local)	...if 1) Project period includes multiple years indicate # awarded, and doc. or e-mail from sponsor indicating cum. treatment	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
State (incl. VA agency or institution)	...if 1) Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
Local Government	...if 1) Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
Industry	...if 1) Clinical Trial, or Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
Foundation (incl. Associations)	...if 1) Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
Foreign Sponsor	...if 1) Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index
Other Sponsor (incl. Hospital, State other than VA, or Univ. other than VA institution)	...if 1) Project period includes multiple years indicate # awarded	...and RR	Cumulative ...then Single Index
	unless 2) Annual Reporting or Carry-forward approval required	...then	Budget Period Index

Reminders.....

- Cost transfers to sponsored program indexes may be made only within 60 days from the date of the month end Banner report on which the charge first appears.
- Once an index closes and the final financial report has been submitted to the sponsor, no expenses may be charged to the closed index but must be funded elsewhere.

Reminders continued.....

- Please use the available Banner reports, ePrint reports, and VCU Reporting Center reports to reconcile your grants monthly
- Non-compliant labor PHARED transactions identified recently: August-13 transactions; September-22 transactions; October-25 transactions; November – 37 transactions; December – 17 transactions

Current and Future Initiatives

- Changing Industry Clinical Trial budgets in Banner to reflect payments received
- Addressing special reporting needs (e.g. Financial Aid grant drawdown monitoring, clinical effort total compensation, and electronic FER)
- Working with Controller to address process changes needed for Dashboard project

Initiatives continued.....

- G&C staff are participating on Finance and Administration Teams to further improve processes, communications, outreach, people development, and best practices
- Assess the potential need to upgrade to newer versions of ECRT
- Engage the VCU Survey Research Lab to develop and administer a survey to determine what is important to you.

Thank You

- Thanks for your continued support and your efforts to minimize compliance risks in fiscal administration
- Please don't hesitate to contact your responsible grant accountant, or Effort Reporting if you need assistance or have questions.



Effort Reporting Updates & Reminders

RACM January 2012



Agenda

- Reminders
- Communication



Reminders

- ECRT Period Reminders
 - Upcoming Certification Period
 - 06-10-11 to 12-09-11 (Feb 2012)
 - Due Dates
 - 09-10-11 to 12-09-11 (03-14-12)
 - 08-10-11 to 12-24-11 (03-21-12)
- General Reminders
 - Proactive Reviews
 - Processing ECRT Cards
 - Other



Communication

- Weekly Processing Reminders
- PI-Quarterly Certification Period Email
- ECRT Availability Notifications link
- System Generated Emails
- Other



THANK YOU