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

- NIH Grant originally awarded 11/01/2010
- FY2012 continuation funds awarded 11/01/2011
- Cap remains at $199,700 until FY2013 funds are awarded

- 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

<table>
<thead>
<tr>
<th>Institutional Base Salary of $200,000</th>
<th>Old Cap ($199,700)</th>
<th>New Cap ($179,700)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effort at 50%</td>
<td>$100,000</td>
<td>$100,000</td>
</tr>
<tr>
<td>Charged to Project</td>
<td>$ 99,850</td>
<td>$ 89,850</td>
</tr>
<tr>
<td>Cost-Share</td>
<td>$ 150</td>
<td>$ 10,150</td>
</tr>
</tbody>
</table>

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

MONIKA MARKOWITZ, PHD
MSMARKOW@VCU.EDU
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**
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
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/IRBUC may require additional management.

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

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

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 - mmarkow@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 a 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.
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
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.
<table>
<thead>
<tr>
<th>Account</th>
<th>Award ID</th>
<th>Project Description</th>
<th>Contractual Basis</th>
<th>Budget Amount (in thousands)</th>
<th>Funding Source</th>
<th>Start Date</th>
<th>End Date</th>
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*Draft - This document is a draft and should not be used for official purposes.*
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