

Quarterly Research Administrator's Meeting

Office of Research Administration
10/17/2019

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Marley Thrasher – Research Admin Toolbox, PI Training
Nate Martinez Wayman – Payroll Cost-Share Tool
Jennifer McCallister – SBIR/STTR
Blake Perrault – myResearchhome
Michael Dickman – ORA Update

AGENDA

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Principal Investigator Financial Compliance Training

A required,
comprehensive
financial compliance
training module for PIs,
Co-PIs, and PI Fellows.



TOPICS

1. Rules and Regulations
2. Duke Roles and Responsibilities in Sponsored Research
3. Allowability, Allocability, & Reasonableness
4. Direct vs. Facilities and Administrative Costs
5. Cost Sharing
6. Stewardship
7. Effort Commitment and Reporting
8. Foreign Activities

Principal Investigator Financial Compliance Training

Requirement → PIs, Co-PIs, PI Fellows with sponsored projects

Timeline → Launch by Sept. 30 – Complete by January 31

Consequence → After January 31, awards held in SPS until completion

Options → 30 minute online module or in-person meeting attendance

Host an in-person session!

- ✓ Complete the requirement in one fell swoop
- ✓ Added engagement and discussion
- ✓ Access to representatives from Duke Finance for faculty questions

Contact Katherine.Norris@duke.edu if you are interested in hosting a session.

Principal Investigator Financial Compliance Training

Thank you to all the Duke faculty and leadership who helped support development of this training:

Larry Carin, PhD
Francis Chan, PhD
Joel Collier, PhD
Stephen Craig, PhD
Colin Duckett, PhD
Chris Freel, PhD
Amanda Hargrove, PhD
Brent Hoffman, PhD
Sue Jinks-Robertson, PhD

Meta Kuehn, PhD
Billy Newton
Christopher Nicchitta, PhD
Sallie Permar, MD, PhD
Geeta Swamy, MD
George Truskey, PhD
Jenny Tung, PhD
Kent Weinhold, PhD

Payroll Cost Share – What's New?

Nate Martinez-Wayman
Office of Post-Award Administration

7

WHY?

- ▶ DHHS Salary Cap Compliance
- ▶ Limited Flexibility
- ▶ Manual Monthly Processes

8

TODAY - iForms

Company	Cost Center	WBS Element	Cost Object Description	ST	SC	Pct
0010	1573180		POST-AWARD ADMINISTRATION	60	00	50.00
0010		2832614	JHU SUBAWARD PARENT	60	36	40.00
0010		2832614	JHU SUBAWARD PARENT	60	34	10.00
				60		0.00

Add Delete

Funding Source for Cost Sharing

Cost Center	WBS Element	Cost Object Description
1573180		POST-AWARD ADMINISTRATION

9

TOMORROW - iForms

Company	Cost Center	WBS Element	Cost Object Description	ST	SC	Pct
0010	1573180		POST-AWARD ADMINISTRATION	60	00	50.00
0010		2832614	JHU SUBAWARD PARENT	60	36	50.00
				60		0.00

Add Delete

10

TOMORROW – GM Tab

Funding Source - Employee

Back To List | Back To Search

Employee ID: 08459960 Name: NATHAN A MARTINEZ-WAYMAN
 BFR: 3224073600 BFR Name: Post-Award Administration
 Created By: GKH4 Created on: 09/01/2019

Check | Save | Add Line | Delete Line

Salary Type	%	CC Funding Source	WSSE Funding Source	Cost Object Description
ALL	100.0000	1573180		POST-AWARD ADMINISTRATION

STEP REQUIRED ONLY ONCE FOR DHHS SALARY CAP

11

WHAT'S NEXT?

Parallel Period Data Review and Validation

Training

Communication

Go-live for payroll transactions

Sept

Oct 1 - 31

Nov 1

Changes in SBIR/STTR procedures

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Why are we making changes?

- Often SBIR/STTR awards have issues not found in other types of grants
- Faster turn-around when issues identified at pre-award
- Provide expectations and transparency to small businesses
- Consistent procedures across the university

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What is an SBIR/STTR

- Federally funded program to encourage small business concerns to participate in research and development that has the potential for commercialization
- 11 federal agencies participate in the SBIR program/ 5 in STTR
- Each agency may have different standards

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Key differences

ISSUE	SBIR	STTR
LEAD PI	Lead PI must be primarily employed by the SBC (e.g. 51% of full-time effort) at the time of award and for the duration of the award. This means Duke faculty are not eligible to be lead PI on a SBIR	Primary employment of lead PI is not stipulated (can be a Duke employee) Duke faculty or employee must have at least 10% effort on the award, which must be limited to either Duke or the SBC (NOT BOTH)
TERM	Phase I: up to 6 months Phase II: up to 2 years	Phase I: up to 1 year Phase II: up to 2 years
IS COLLABORATION REQUIRED?	Allowed, but not required	Requires collaboration with a non-profit research institution
LIMITS ON SUBCONTRACTING DISTRIBUTION	Phase I - a maximum of 33% of the work may be subcontracted to third party Phase II, a maximum of 50% of the work may be subcontracted to a third party	Phase I and Phase II— a minimum of 30% of the work (maximum of 60%) must be subcontracted to a non-profit research institution (i.e., must be a formal collaboration)

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Duke Concerns

- Under an SBIR application (and NSF STTR), the Principal Investigator's primary appointment is with the company and not Duke University.
- Under an STTR application, the Duke University faculty may only provide effort either for the company or the University, but under no circumstances may the Duke faculty member represent both on this project.
- Financial conflicts of interest may preclude a Duke faculty member from serving as a Principal Investigator.
- Under either type of application, the company will maintain the required effort amounts.

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Duke Concerns (cont.)

- Duke University facilities and resources (equipment, personnel, IRB, IACUC, etc.) may only be used to carry out the Duke University portion of the project. IRB and IACUC reliance agreements are required in order to use Duke's assurance numbers in applications. Duke staff cannot prepare and submit applications for SBC.
- A copy of the full application will be required prior to entering into a subaward. Confidential information may be redacted by the company.
- Documents submitted by Duke University cannot be changed by the company prior to submission to the federal agency.
- Advance payment may be required upon execution of the subaward.

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Conflict of Interest

- When a faculty member or any member of the Duke research team has a financial interest in the SBC applying for funding and also plan to conduct research funded by the SBC at Duke, this creates a COI and could lead to the following problems:
 - Concern that the individual may be using their Duke lab, students, staff, funds or other Duke resources to support their SBC, jeopardizing academic research and the progress of their students and staff; and
 - Blurring the non-profit/for profit boundary (i.e., use of tax-exempt facilities in a way that competitively advantages a for-profit.)
- If the SBC has licensed IP from Duke, this could also involve an institutional COI.
- A COI Management plan must be in place before a sub-award can be accepted

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Procedures – DOSI-COI

- **Personal COI.** If anyone on the proposal for Duke (faculty, student, fellow, staff, contractor, consultant, etc.) has a financial interest in the SBC (e.g., equity, options, compensation, rights to IP that the SBC acquired, etc.), the Duke PI and/or the potentially conflicted individual(s) must consult with the Duke Office of Scientific Integrity COI (DOSI-COI) to determine if any perceived, potential, or actual COI exists
- **Institutional COI.** The Duke PI and/or the potentially conflicted individual(s) also must consult DOSI-COI if Duke has its own financial interest in the SBC (e.g., equity, options, rights to royalties or other payments through a license)

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Procedures – Pre-award office

- **Obtain copy of full application – must be provided by company either prior to submission (if possible) or after submission but prior to entering into a sub with Duke**
- **Provide SBIR/STTR proposal cover letter required**
- **Coordinate IP agreements at application stage**
- **Provide private benefit review**

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Private Benefit Review

- Using Duke's personnel (e.g., departmental research administration staff) to prepare or submit the SBC's proposal, to administer the award
- Using Duke's resources (e.g., personnel, equipment, space, etc.) to operate its business or to complete any portion of the SBC's work

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Procedures – Department/Center

Department Chair or Institute/Center Director (or designee, to include Vice Chair or Business Manager) provides review for the following:

- Uses Duke research facilities (labs, IACUC, IRB, etc.) only for Duke's portion of the project
- Has approval for use of Duke research facilities (labs, IACUC, IRB, etc.) and any use of Duke facilities is solely for Duke's portion of the project
- Reflects full cost recovery of direct and indirect costs

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Procedures – Department/Center

- Please check the new box on the sponsor tab in SPS for SBIR/STTR applications:

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Proposal cover letter

Duke is submitting the application with the following understandings:

- Under an SBIR application, the Principal Investigator's primary appointment is with the company and not Duke University.
- Under an STTR application, the Duke University faculty may only provide effort either for the company or the University, but under no circumstances may the Duke faculty member represent both on this project. Financial conflicts of interest may preclude a Duke faculty member from serving as a Principal Investigator.
- Under either type of application, the company will maintain the required effort amounts.
- Duke University facilities and resources (equipment, personnel, IRB, IACUC, etc.) may only be used to carry out the Duke University portion of the project. IRB and IACUC reliance agreements are required in order to use Duke's assurance numbers in applications.
- A copy of the full application will be required prior to entering into a subaward. Confidential information may be redacted by the company.
- Documents submitted by Duke University cannot be changed by the company prior to submission to the federal agency.
- Advance payment may be required upon execution of the subaward.

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Procedure – Award Stage

- If the company needs Duke to draft the agreement, please submit a request form:

Research Support Office | Office of Research Administration | Government and Foundation Contracts
 Training Agreements | SBIR/STTR request form

SBIR/STTR request form

Please provide the following information if a company wishes an SBIR/STTR and requests that Duke submit the subaward/subcontract.

Agency _____
 Your Name * _____
 Your email address * _____
 PI's * _____
 Company name * _____
 Company contact information * _____

Please click on the icon below to go to the online form.

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Procedure – Award stage

- SOM-RA will review application and work with DOSI-COI to resolve any issues during the negotiation of the subaward/subcontract.
- Subaward/subcontract will be executed after any identified issues are resolved.
- Spending prior to execution is at the risk of the department.

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ORA NEWS AND REMINDERS

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Thank You

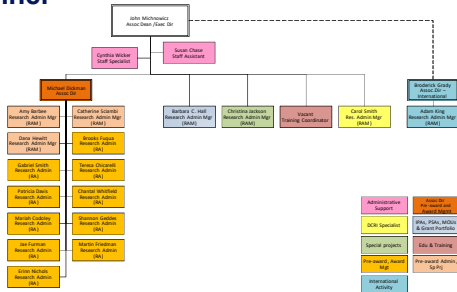
1st annual research admin appreciation day lunch committee and those who came and supported

- Laurianne Torres
- Dana Sanders
- Ashley Dew
- Kristy Gajowiak
- Mary Robertson
- Sandra yee Benedetto
- Tammy Kim
- Traci McNeill

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ORA Personnel Update

- Arrivals
 - N/A
- Departures
 - Mariah Codooley
- Openings
 - Training Coordinator
 - RA



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Collaborate!

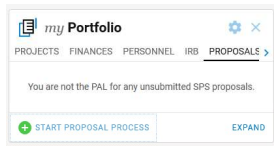
Invite us to your staff meetings...

and Supplemental Application Support!



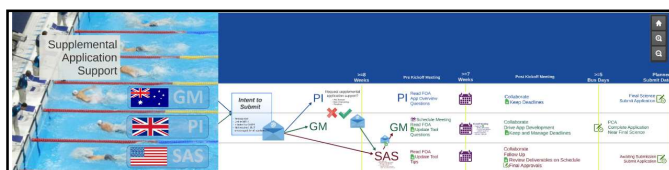
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Intent to Submit



- Redcap tool
- Link in MRH
- Initiated by PI or GM
- Not required, BUT encouraged for all applications
- Sends notifications:
 - PI
 - Dept Central Inbox
 - ORA Central Inbox
 - Department of Research Initiatives

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- Collaborative, team based (PI/GM/ORA) approach to application review
- Identify deliverables and address issues in advance of 5 day deadline!
- Review and finalize deliverables as completed

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SAS Tool

Customizable list:

- Simple (excel)
- Deliverables
- Responsibility
- Deadline for each deliverable

Office of Research Administration - Supplemental Application Support - Assignments Worksheet			
1 Preliminary Information		Duke Contacts	
2 SPS #		PI Name	phone number
3 PI			e-mail
4 Sponsor (if N/A, list K)		PAL Name	phone number
5 Fisk			e-mail
6 Application Type	<input type="checkbox"/> New <input type="checkbox"/> Renewal <input type="checkbox"/> Recombination	ORA Rep Name	phone number
7 Agency Due Date			e-mail
8 Dept. Needs by Date		Helpful Links	
9 ORA Due Date		myResearchSubmissions	
10 Submission Mechanism		Help Search Policy Statement	
11 Title		New Application Guide	
12 Submitting to Other Agencies			
13 Proposal Start and End Dates			
14 Budget Type	<input type="checkbox"/> Direct <input type="checkbox"/> Indirect		
15 Program Income			
16 F&A Rate & Base	<input type="checkbox"/> 0% <input type="checkbox"/> 5% <input type="checkbox"/> 10% <input type="checkbox"/> 15% <input type="checkbox"/> 20% <input type="checkbox"/> 25% <input type="checkbox"/> 30% <input type="checkbox"/> 35% <input type="checkbox"/> 40% <input type="checkbox"/> 45% <input type="checkbox"/> 50% <input type="checkbox"/> 55% <input type="checkbox"/> 60% <input type="checkbox"/> 65% <input type="checkbox"/> 70% <input type="checkbox"/> 75% <input type="checkbox"/> 80% <input type="checkbox"/> 85% <input type="checkbox"/> 90% <input type="checkbox"/> 95% <input type="checkbox"/> 100%		
17 Human Subjects	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other / Specimen <input type="checkbox"/> Change Top		
18 IRB #			
19 Personnel	See Personnel Worksheet		
20 Foreign Component			
21 Sub Recipients	See Subrecipient Worksheet		
22 Institutional Approvals		File Location	Assignment
23 Electronic Submission	Submit by and/or to - Follow will need to complete		
24 Request for Rush Service	ORA-OR Business Days from Dept. Needs by Date		
25 Task Reviewer	Proposals SPS with Department Approval		
26 Limited Submission	Proposals SPS with Department Approval		
27 Application Sections, Attachments, and SPS			
28 SPS424 (R&R) Form			
29 Form is created based on information input into the SPS needed for the application. Forms are generated at time of submission and can be printed.			
30 Form is created based on information input into the SPS needed for the application. Forms are generated at time of submission and can be printed.			
31 Form is created based on information input into the SPS needed for the application. Forms are generated at time of submission and can be printed.			
32 Form is created based on information input into the SPS needed for the application. Forms are generated at time of submission and can be printed.			
33 Form is created based on information input into the SPS needed for the application. Forms are generated at time of submission and can be printed.			

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SAS Eligibility

- Initiate with Intent to Submit **27 Requests!**
- New and competing applications **13 Submissions!**
- Any sponsor (NOT industry or federal contracts)
- GM notify ORA-SAS@duke.edu ≥8 weeks prior to planned submission deadline
- GM schedule kickoff meeting
 - Include PI, GM, and SAS (ORA)
 - ≥7 weeks prior to planned submission deadline

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5 Day Deadline Complete Application

- ORA website - [Application Review and Guidance](#)
- Complete application
 - All required application components must be included
 - Science may be in a 'near final' state
- Applies to all applications routed to ORA at PCA
- Incomplete applications at PCA will be returned for changes
- Waiver will be required if the complete application is NOT available to ORA by the ~~new~~ 5 day deadline

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Subaward Letter of Intent/Commitment

- Complete the form in it's entirety
- Include in SPS internal docs for ORA signature
- Audit questions to: ospsubcontractmgmt@duke.edu
- Reach out to ORA with questions

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SPS UPDATE

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Who Attests and When...

	New Proposal Attestation	Award Attestation
Who	PI, Co-PIs, Multi-PIs, PI Fellows	Key Personnel named on the Notice of Award
When	When SPS record is routed for review by owning org. or state is changed out of 'Initialized' by central office prior to proposal submission	When SPS record is set to 'Awarded' by central office (or manually generated by a central office while in 'AIP')

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Who Attests and When...

	Non-Competing Renewal	Addition of Key Personnel
Who	Key Personnel named on the Notice of Award who have not previously attested during the life of the award	Key Personnel added during the life of the award
When	When SPS record is set to 'Awarded' by central office (or manually generated by a central office while in 'AIP')	When SPS record is updated/awarded by central office

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How Proposal Attestation Works

Owning Org. drives the process*

- Attestation is triggered by status change out of Initialized
- Must be completed prior to submitting the application

- ✓ Participating faculty and proposed KP will receive an email with a subject line starting with 'Notification'
- ✓ PIs, Co-PIs/Multi-PIs, & PI Fellows will receive an email with a subject line starting with 'Action Required' which will have a link to their attestation form
- ✓ PIs, Co-PIs/Multi-PIs, & PI Fellows will complete their attestations in myRESEARCHhome

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Where Can I Find if Attestation is Complete?



- **Overall Attestation Status for an SPS record**
 - In the information section at the top of an SPS record, for both proposals and awards
- **Detailed Attestation Status for an SPS record**
 - For proposals: on the workload page (PPG Personnel for composites)
 - For awards: on the NEW award personnel page
- **Attestation Status for an individual**
 - In myRESEARCHhome via the NEW my Researchers widget

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SPS Status Updates: Submit

- ORA monitors and updates the status of SPS records
- Updating a status may effect attestation process and successful submission through Grants.Duke

SPS - Proposals	
History for Proposal #250598	
Go directly to:	
	Awarded at 07/30/2019 at 03:09pm
	Submitted at 06/21/2019 at 08:51am
	Awaiting Submission at 06/21/2019
Proposal	Pending Central Approval at 06/17/20
Proposal ID	Pending Non-Central Approval at 06/17/20
FDRI Name	Returned For Changes at 06/17/2019
Sponsor	Pending Non-Central Approval at 06/17/20
Opening Date	Initialized at 05/30/2019 at 04:04pm
PI/PPD Date	
Short Title	
Project Date	
Critical Title	

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SPS Status Updates: Submit

Please do NOT update SPS status to:

Department User View

Prop ID	Actions
21005	Mark as Submitted

SPS Inbox - Option to 'Mark as Submitted'

SPS Record - Option to 'Submit' record

Watch out for faculty editing SPS

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SPS Status Updates: AS

- Industry/IPA/PSA SPS records will be set to AS before being processed
- Previously these would have stayed as PCA

SPS - Proposals

History for Proposal #25008

- Waiting Submission at 09/27/2019 at 10:11am by Hall, Barbara C.
- Pending Central Approval at 09/26/2019 at 04:28pm by Eaton, Shannon D.
- Pending Non-Central Approval at 09/23/2019 at 10:37am by Lamplin, Bettina C.
- Initialized at 09/10/2019 at 10:41am by Lamplin, Bettina C.

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SPS Duke Orgs

Three ORG noted in SPS:

- PI Duke Org
 - PI's primary appointment
- Owning Duke Org
 - Determines which department owns the SPS record
- Facepage Org
 - Facepage ORG defaults to PI Duke Org
 - Impacts NIH dept rankings
 - Watch out for centers and institutes (NIH credit)

Main Sponsor Admin Activity Clearances Federal Info Summary of Work

Principal Investigator

Name: Golds Malek

Title: Assoc Professor

Duke Org: 6860206045 - Retinal Ophthalmologic

Main Sponsor Admin Activity Clearances Federal Info Summary of Work

Project Period: 07/01/2017 to 09/30/2022 (60 months)

Current Budget Period: 07/01/2017 to 09/30/2018 (12 months)

Owning Duke Org: 6860206045 - Retinal Ophthalmologic

Face Page Org: Ophthalmology

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SPONSOR UPDATES

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eRA Alert: Reminder to Thoroughly Check Grant Application Images in eRA Commons

Wednesday, September 11, 2019

- eRA Commons received several reports of blank pages appearing in the assembled application images generated by the eRA system. In each case, the blank pages were shown in place of submitted PDF attachments generated from images (e.g., scanned documents) rather than text (e.g., Word files). The eRA team is working to isolate and address the root cause for the blank pages.
- Grant applicants are reminded of their responsibility to check their application images in eRA Commons during the 2-business day [application viewing window](#). Be sure to check the entire application, paying special attention to any scanned attachments. If you encounter any blank pages in place of application content, contact the [eRA Service Desk](#) immediately following our standard guidelines for [Dealing with System Issues](#).

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Application Validation

- Duke had a couple applications with this issue
- Correct pages were visible in Grants.Duke
- Correct pages visible when viewing application in eRA Commons
- Blank pages appeared when downloading pdf from eRA Commons

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ORCID
Connecting Research and Researchers

[SIGN IN/REGISTER](#) [English](#)

[Registry](#)

[FOR RESEARCHERS](#) [FOR ORGANIZATIONS](#) [ABOUT](#) [HELP](#)

Register for an ORCID ID 7,302,823 ORCID IDs and counting. See more...

ORCID provides a persistent digital identifier that distinguishes you from every other researcher and, through integration in key research workflows such as manuscript and grant submission, supports automated linkages between you and your professional activities ensuring that your work is recognized.

Per ORCID's terms and conditions, you may only register for an ORCID ID for yourself.

What is ORCID

ORCID is a nonprofit organization helping create a world in which all who participate in research, scholarship and innovation are uniquely identified and connected to their contributions and affiliations, across disciplines, borders, and time.

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ORCID
Connecting Research and Researchers

- October 1, 2019 - ORCID identifiers will be required for individuals supported by:
- institutional and individual research training
- career development
- other research education awards
- Must link ORCID to eRA Commons account
- Applications will receive a warning and not accepted upon review

<https://nexus.od.nih.gov/all/2019/09/04/dont-forget-to-link-your-oid-to-your-era-commons-profile/>

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GrantSupport.Duke.edu

Duke UNIVERSITY [Home](#) [EDIT LINKS](#)

Important NIH Info

Duke University NIH Grant Administration Guidance

In response to recent changes in requirements from the NIH, several new efforts to enhance proposal development, submission, financial oversight, and research integrity have been introduced to further strengthen Duke's research infrastructure and administration. As a reminder, the following is now required for all Duke NIH awards:

- **Detailed budgets** - for all modular applications (at Just-in-Time) and RPPRs effective April 1, 2018
- **Carryover requests** - prior NIH approval for all effective May 15, 2018
- **No cost extension requests** - prior NIH approval for all for existing grants effective April 1, 2018

This website provides information and guidance necessary for faculty and grant managers across Duke to comply with NIH's requirements. We will continue to keep you updated via this website as we learn more from NIH. **See Updates for latest information.**

Please let us know if you have questions or concerns - email grantsupport@duke.edu.

Other Support - Current and Pending NEW

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Other Support - Current and Pending

Overview

By the time you are completing Other Support forms, you are pending documentation of the award proposals and reports, researchers and faculty members provide assurances to their sponsors that the research being conducted is not similarly being reported or supplemented by other sources.

These forms and processes are for Principal Investigators (PIs) and key personnel to disclose all research funding financial available in support of the individual's research, regardless of whether the support originates from Federal and non-Federal sources. OS/C&P does not include training awards, prizes and gifts. The terminology and format varies by sponsor. Sponsors also require reporting at different times during the life of the award. Grant Managers and faculty should review details provided in the Notice of Award and sponsor guidelines.

Additional Information and Resources

- NIH Notice Overview
- Information Session Slides
- Frequently Asked Questions (FAQs)
- Faculty Questionnaire
- Other Support Duke Internal Example
- Faculty Communication
- Administrator Communication

Other Support - Current and Pending NEW

Tools and Resources

Frequently Asked Questions

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my RESEARCH home

A PORTAL FOR THE DUKE RESEARCH COMMUNITY

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PROFESSIONAL DEVELOPMENT AND TRAINING UPDATE

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Other Professional Training Opportunities

- NIH Seminar
 - Phoenix, AZ; Nov 6-8
- NCURA Annual Meeting
 - St. Pete Beach, FL; April 26-29
- SRA Southern Section
 - Savannah, GA; Mar 22-25

 National Institutes of Health
Office of Extramural Research

 **NCURA**
Supporting Research...together™

 **SRA** International
Society of Research Administrators International

 **Duke** UNIVERSITY

[illegible]

Upcoming ORA Training Classes

- ORA SPS - Nov 13, 2019, 9-12PM
- ORA SPS - Dec 10, 2019, 1-4PM
- IPA class - Jan 23, 2019, 9:00-11AM
- MOU/PSA - Feb 18, 2019, 9-11AM

[illegible]

LMS Registration & Credit

- If you are not on the roster &/or signed up less than 2 business days prior to our meeting, give us 2 business days to add you to the system (remember to sign in legibly & with Net ID)
- Those who did not sign in will be listed as 'no shows' in LMS within 3 business days

```
graph TD; A[ ] --> B[ ]; B --> C[ ]; C <--> D[ ]; D --> E[ ]; D --> F[ ]; E --> G([ ]); F --> H([ ]); I([ ]) --> H; J([ ]) --> H; K([ ]) --> H; style K stroke-dasharray: 5 5; style J stroke-dasharray: 5 5; style I stroke-dasharray: 5 5;
```

[illegible]

LMS Credit Quarterly Mtg & Survey

Main Learning Assignments Associated Learning Ratings					
Learning Assignments Print Export Modify Table					
Module	Assignment Type	Requirement	Details	Completion Status	Completed On / Actions
ORA Research Administrators Quarterly Meeting	Session	Required	Start Date: 07/18/2019 Start Time: 1:30 PM End Time: 4:30 PM	Not Evaluated	
RA Quarterly Evaluation	Training Content	Required	Attempts Allowed: Unlimited Start Date: 07/18/2019 End Date: 08/08/2019	Not Evaluated	Launch

- To receive credit, sign into LMS and launch evaluation
- Code NOT required
- Credit should be listed in LMS within 14 days **after** survey is completed