Agenda

Research Application Development (RAD)
 – Debera Nixon

Budget & Finance Reporting
 – Leroy Lee

Closeout Project Team
 – Nate Martinez-Wayman & Moria Montalbano

Office of Research Administration (ORA)
 – Michael Dickman
   ➢ ORA News & Reminders
   ➢ Sponsor Related News and/or Tidbits
   ➢ Miscellaneous News and/or Tidbits
SPS Web – Recent Releases

- Awards 4.11 (8/13/2015) - Addition of Uniform Guidance field
- Proposals 7.3 (9/9/2015) - View/edit for Non-Competing PPGs (marks completion of the port for departmental users!)
- Proposals 7.3.1 (9/16/2015) - Inactive SPS Users can no longer log into SPS Web Proposals
- Proposals 7.4 (10/26/2015) - PDF attachment for Non-competing Renewals (1st post port enhancement!)

SPS Web – Upcoming Releases

- RAAC-requested changes to assist in Other Support generation, including addition of:
  - Major goals statement
  - Abbreviated aims statement (for DoD OS)
  - Agency contact info (for DoD OS)
- Check to ensure we support required forms for proposals that will be submitted in Grants.Duke (as FOA is added or S2S flag is set to Yes)
- Support for No-Cost Extension Requests
### Sponsored Effort – Upcoming Releases

- Pull in new Other Support info (e.g., Major Goals, Abbreviated Aims, Agency Contact info)
- New section to display 5 years of Inactive Award Information (for DoD OS)

### Grants.Duke – Upcoming Releases

- For NIH, include Commons ID for everyone listed on Senior/Key Person template (if on file)

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#### Functionality

<table>
<thead>
<tr>
<th>Functionality</th>
<th>SPS WEB</th>
<th>SPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Search For Existing Proposals</td>
<td>✔️</td>
<td>✔️</td>
</tr>
<tr>
<td>Create/Edit/Route/Copy Regular New, Competing Renewal, &amp; Non-Competing Renewal Proposals</td>
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<td>✔️</td>
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<tr>
<td>Create/Edit/Route New, Competing Renewal, &amp; Non-Competing Renewal Program Project Grants</td>
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<td>✔️</td>
</tr>
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<td>Append To Proposal Memo</td>
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<td>✔️</td>
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<td>Attach/Detach Internal Documents</td>
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<td>✔️</td>
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<tr>
<td>Preview/Print Sponsor-Specific Forms</td>
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<td>✔️</td>
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<td>Preview/Print DPAF</td>
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<td>✔️</td>
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<td>Inbox Access</td>
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<td>✔️</td>
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<tr>
<td>View Proposal State History</td>
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<td>✔️</td>
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<tr>
<td>Complete All Proposal Notebooks</td>
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<td>Display F&amp;A Base Amount</td>
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<td>Attach PDFs to Non-S2S Proposals</td>
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<tr>
<td>Access From Mobile Device</td>
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<td></td>
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<tr>
<td>Preview/Print Review Copy</td>
<td>✔️</td>
<td></td>
</tr>
<tr>
<td>User Setup</td>
<td>✔️</td>
<td></td>
</tr>
</tbody>
</table>
SPS Web/Legacy Statistics

- SPS Web - 3,769 proposals created since March 2015 (15 composites, 39 minis)
- Legacy - 970 proposals created since March 2015 (35 composites, 194 minis)
- SPS Web - 818 users are now utilizing SPS Web
- Legacy – 95 users have logged in since 9/1/2015 (includes 46 departmental users)

SPS Web – Reminders / Points of Interest
SPS Web – The dreaded ‘no access’ page

- If your PI tells you they can no longer add Enrollment data, they are likely seeing a page that looks like this when they click the Enrollment link in Grants.Duke
- What caused this?
  - Their SPS User record is inactive
- How do I fix it?
  - Contact your SPS Security officer and ask them to reactivate the PI’s SPS User record

SPS Web–How to Check and Update PAL field prior to Routing

- Go to Validate All page
- Enter new name into Dept. Pre-Award Liaison (PAL) field
- Select desired name from pop-up
SPS Web–Can changes be made in PNCA? YES!!

- Who can edit while in PNCA?
  - Initiator (as shown in Initiated By field)
  - Anyone on the Owning Org route
  - No need to first uncomplete sections!

SPS Web – Changes while in PNCA? Caveats!!

- Changes cannot be made to Salary information
  - Must be Returned for Changes if updates need to be made to Salary or Effort
SPS Web – Changes while in PNCA? Caveats!!

- Budget cannot be inflated (since this changes Salary)
- Other budget categories can be changed
- F&A Costs can be recalculated

SPS Web – Changes while in PNCA? What??

- Budget Justification can be updated while in PNCA
- No need to uncomplete sections!
- No impact on other reviewers (as happens in legacy)!
SPS Web – All PPGs can now be created/edited

• Click the Create New PPG link on the Proposal Browser
• Select the PPG Type (New, CR or NCR)
• Enter required information and Save

SPS Web–Simplified navigation for PPGs

• Every notebook has a List of Minis or Composite Info tab
• Allows you to quickly move back and forth between the Composite and its Minis
• Minis can be added/deleted from any notebook
SPS Web—Simplified biosketch handling for PPGs

- PPG Personnel tab allows you to manage biosketches for all Senior/Key personnel from one centralized location

SPS Web—Life After Port (‘Top 5’ Requests)

- PDF attachment for Non-competing Renewals
- Prime Sponsor to drive business rules in the budget (e.g., fringe rates)
- Apply $25,000 cap for Subawards in Year 2-5
- Separate fields for indicating the following types of Cost Sharing:
  - Over the Salary cap
  - Sponsor-required
  - Voluntary/Committed
  - ???
### School of Medicine NIH Awards FFY2013 vs. FFY2014 – in Millions

<table>
<thead>
<tr>
<th>2013 RANK</th>
<th>2014 RANK</th>
<th>NAME</th>
<th>FFY 2013 SCHOOL OF MEDICINE AWARDS</th>
<th>FFY 2014 SCHOOL OF MEDICINE AWARDS</th>
<th>% CHANGE</th>
</tr>
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<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>UNIVERSITY OF CALIFORNIA SAN FRANCISCO</td>
<td>$439.6</td>
<td>$480.6</td>
<td>9.3%</td>
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<tr>
<td>2</td>
<td>2</td>
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<td>$404.9</td>
<td>$423.7</td>
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<tr>
<td>3</td>
<td>3</td>
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<tr>
<td>4</td>
<td>4</td>
<td>WASHINGTON UNIVERSITY</td>
<td>$298.5</td>
<td>$353.9</td>
<td>18.6%</td>
</tr>
<tr>
<td>5</td>
<td>5</td>
<td>STANFORD UNIVERSITY</td>
<td>$314.8</td>
<td>$349.0</td>
<td>10.9%</td>
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<tr>
<td>6</td>
<td>6</td>
<td>YALE UNIVERSITY</td>
<td>$311.8</td>
<td>$328.1</td>
<td>5.2%</td>
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<tr>
<td>7</td>
<td>7</td>
<td>UNIVERSITY OF PITTSBURGH</td>
<td>$297.0</td>
<td>$317.1</td>
<td>6.8%</td>
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<tr>
<td>8</td>
<td>8</td>
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<td>$302.0</td>
<td>3.0%</td>
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<tr>
<td>9</td>
<td>9</td>
<td>UNIVERSITY OF CALIFORNIA SAN DIEGO</td>
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<td>12</td>
<td>UNIVERSITY OF MICHIGAN</td>
<td>$284.4</td>
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<td>-0.7%</td>
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</tbody>
</table>

Source – NIH Web Site

### NIH Rankings by Department

Driven by the Face Page Org.
- The NIH does not track Centers and Institutes – just departments.
- For the Face Page Org - Select the PI’s Primary Faculty Appointment from the drop down list.
- This department will print on the SF424 Cover, Item 14, Department field.
- This field is for NIH rankings only.
- The selection will not affect the actual Owning Duke Org. The Owning Duke Org remains administratively and financially responsible for the project.
NIH Rankings by Department

- When entering a record into SPS, the ‘Face Page Org’ may need to be modified.
- On the Main Notebook, Admin Tab, in the Face Page Org drop down box, please select the PI’s primary faculty appointment.

Scenario #1: The owning org is DCRI, but the PI’s primary faculty appointment is to Pediatrics.
Next Steps: Please select Pediatrics.

Scenario #2: For proposals with a mentor and mentee (such as NIH F proposals) – The mentor’s primary faculty appointment is to Cell Biology, but the mentee is in Biochemistry.
Next Steps: Please enter the mentor’s primary faculty appointment – Cell Biology.
 NIH Rankings by Department

Scenario #3: The owning org is Orthopaedics, but the PI’s primary faculty appointment is to the Pratt School of Engineering.

Next Steps: Please select School of Engineering.

Then, please forward the SPS number to gcmail@mc.duke.edu.

The SOM Finance office will be contacted for additional review.

Scenario #4: The owning org is Psychiatry, but the PI’s primary faculty appointment is to Medicine.

Next Steps: Please select Medicine.

 NIH Rankings by Department

Thank you.
Closeout Project Update

October 29, 2015
ORA Quarterly Meeting

Nate Martinez-Wayman, Moria Montalbano

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Agenda

Reminders
- Late Final Peer Invoices
- Tuition Remission
- Payroll Access

Updates
- Workflow Status Reports by Cost Object
- Programmatic Reporting
Late Final Peer Invoices

Context and Risk

- Subrecipient invoices represent high dollar expenses, received in the last days of project management
- FDP template dictates a deadline for final invoice of 60 days following project end date
- Duke has historically accepted and paid late final subrecipient invoices on the assumption that funds were collectable after sponsor closeout deadlines – no longer safe assumption
- Risk for non-payment increases as Sponsor Due Date approaches

Late Final Peer Invoices

New Procedures and Guidance (effective Sept 2015)

- Duke will attempt to process and collect for valid invoices, but payment of late invoices is at department discretion and risk
- New GAP 200.285 clarifies institutional responsibilities around approval and payments of late invoices

Late Subrecipient AP Check Request Quick Reference Guide is available at https://finance.duke.edu/research/training/other.php?type=r&
Late Final Peer Invoices

Departmental Responsibility

• Departments responsible for determining whether or not to pay *late* subrecipient invoices
• Departments responsible for providing backstop funding for approved subrecipient payments if funds are uncollectable from the sponsor
• If a check request is rejected:
  - OSP will return the invoice to the subrecipient unpaid
  - Departments are responsible for communication and discussion with their subrecipient counterparts

Late Final Peer Invoices

Grant Manager Responsibility

• GMs need to be aware of Key Indicators and Warning Message in eAP Check Requests (eCR)
  - A bug has been identified with the warning message generating for non-subrecipient expenses. A fix is in process.
• Work with your Business Manager to confirm your unit’s business process for approval / rejection of *late* subrecipient invoices which could obligate departmental funds
**Tuition Remission**

**Average Rate Basis Methodology (effective Sept 2015)**

- Updated GAP 200.310, Compensation of Graduate Students on Sponsored Research Projects
- Tuition Remission posts during month-end close
- More information is available on the Grad School website detailing:
  - Updated Tuition Remission Policy
  - How to Use New Methodology in Proposals
  - How to Manage Tuition Remission Exceptions and Cost Sharing
  - Current/Projected Rates

More information on Tuition Remission is available on The Grad School website - https://gradschool.duke.edu/financial-support/financial-policies-forms-and-resources

**Payroll Access**

**New GAPs and technology to support and provide access to information**

- GAP 200.171, Cross Organizational Unit Payroll Management on Sponsored Projects
- GAP 200.172, Payroll Access for Effort Management on Sponsored Projects
- Tools and Reports Available via Grants Management Tab in Duke@Work
- Resources include Quick Reference Guide, Video via LMS and Step by Step Guides via GM Tab

Payroll Access Quick Reference Guide is available at https://finance.duke.edu/research/training/other.php?type=r&
**Payroll Access**

**Key Improvements**

- Direct access to information needed for effective and efficient effort management
- Reports to provide information that used to be harder to compile
- Audit reports to ensure confidentiality and appropriate use of information
- iForms enhancements that minimize the need to re-open closed codes

**Payroll Access Tools and Reports**

Available via Duke@Work > GM Tab > Effort and Payroll Tools and Reports

**NEW TOOLS**

- Employee Data Report
- Unit Payroll Report
- Payroll Report
- Payroll Exception Report

**MOVED REPORTS**

- Payroll Exception Report
- Payroll Exception Report
- Payroll Exception Report
- Payroll Exception Report
- Payroll Exception Report
- Payroll Exception Report

**NEW REPORTS**

- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report

**MOVED REPORTS**

- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report

**NEW REPORTS**

- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
- Weighted Average Report
Weighted Average Report

New Report Available via Duke@Work > GM Tab > Effort and Payroll Tools and Reports

- Provides the monthly salary and % effort over 12 months for a WBSE
  - Can be run for any 12 months, not limited to fiscal year
- Can be used to assist in the preparation of progress reports and confirm effort distributions by cost object easily

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Weighted Average Report

Keep in Mind

- Exempt/Non-Exempt is a selection criteria; therefore, data for each does not display at the same time
- If Supplemental payroll is included, it will be transparent in the report
- While you can run this report for any WBSE, data will only display if you are GM1 or GM2
- Salary information is confidential!
**Workflow Status Reports by Cost Object**

Anticipated rollout end of *Oct 2015*

- Two Versions Will Be Available—
  - iForms
    - GM Tab – Effort and Payroll Tools/Report
    - iForms – Reporting
  - Non-payroll transactions
    - GM Tab – Sponsored Research Reporting
    - Finance Tab – Financial Reports

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**Workflow Status Reports by Cost Object**

Enter Cost Object and Press Go

<table>
<thead>
<tr>
<th>Enter or Paste Cost Objects:</th>
<th>Go</th>
<th>Show History</th>
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</table>

Cost Object Workflow Status Report

<table>
<thead>
<tr>
<th>Cost Object</th>
<th>ID</th>
<th>Type</th>
<th>Org</th>
<th>OrgIC</th>
<th>Created By</th>
<th>Created</th>
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<th>Due</th>
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<th>Level</th>
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<tbody>
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</tbody>
</table>
Workflow Status Reports by Cost Object

Keep in Mind

• Can be used to track the status of transactions in workflow for a specific cost object
• Particularly important in planning for closeout
• Report displays critical details including how long item has been in workflow and current approver, along with email link to that person

Workflow Status Reports by Cost Object

Keep in Mind

• Reports include transactions initiated as of 10/14/15 AND items that have moved in workflow as of 10/14/15
• This report is updated on a thirty minute cycle and should not be used to manage deadlines, such as those associated with corporate payroll deadlines or month-end closing process.
Workflow Status Reports by Cost Object

What’s in Workflow?

<table>
<thead>
<tr>
<th>iForms Transactions</th>
<th>Non-Payroll Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duke Faculty Hiring, Promotion, and Tenure</td>
<td>Accounts Payable Check Requests (APCR)</td>
</tr>
<tr>
<td>system (dFac)</td>
<td></td>
</tr>
<tr>
<td>HR/ Payroll related forms (iForms)</td>
<td>Accounts Receivable (AR)</td>
</tr>
<tr>
<td></td>
<td>Online Expense Reports (denoted as TRAVEL</td>
</tr>
<tr>
<td></td>
<td>and includes all online travel, out-of-pocket,</td>
</tr>
<tr>
<td></td>
<td>and corporate card non-travel reports)</td>
</tr>
<tr>
<td></td>
<td>Electronic Research Administration (ERA) –</td>
</tr>
<tr>
<td></td>
<td>includes CAS/Rebudgets</td>
</tr>
<tr>
<td></td>
<td>Journal entries / vouchers (JVs)</td>
</tr>
<tr>
<td></td>
<td>Accounts Payable vendor invoices with problems</td>
</tr>
<tr>
<td></td>
<td>(APInv)</td>
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<tr>
<td></td>
<td>Buy@Duke transactions (B@D)</td>
</tr>
</tbody>
</table>

Programmatic Reporting

Uniform Guidance Reporting Requirements

- Uniform Guidance (§200.343 Closeout)
- “(a) The non-Federal entity must submit, no later than 90 calendar days after the end date of the period of performance, all financial, performance, and other reports as required... The Federal awarding agency or passthrough entity may approve extensions when requested by the non-Federal entity.”
Programmatic Reporting

Changes with Sponsor Enforcement

• Agencies treating programmatic reports with equal weight as financial reports
• Implications for late/missing submissions impacting the entire institution, not only the PI with delinquent reports
• Agencies have greater visibility on late reports through new technology

Pending Legislation with Senate Committee on Homeland Security and Governmental Affairs & House Committee on Oversight and Government Reform

Directs federal agencies to prepare reports on their efforts to close out financial accounts for expired federal grants and report directly to Congress

Automated Notifications from NIH

Sent on Day 120

• “Failure to submit timely and accurate closeout documents may affect future funding to the organization”
• “unilateral action to close the grant”
• “corrective actions, withholding of further awards, suspension or termination of active awards, removal of streamlined noncompeting application procedures or automatic carry over authority”
Current State and Risks

Minimal central controls; reliant on PIs to manage independent of administrative oversight

<table>
<thead>
<tr>
<th>Current state</th>
<th>Potential risk</th>
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</thead>
<tbody>
<tr>
<td>No centralized tracking of programmatic report due dates. Inconsistent level</td>
<td>GMs can’t help manage faculty submissions. Institution’s response largely</td>
</tr>
<tr>
<td>of support from GM to PI with award terms and reporting requirements.</td>
<td>reactionary to sponsor’s direct requests when reports are late. Risks</td>
</tr>
<tr>
<td>No repository requirements or consistency from unit to unit.</td>
<td>cessation of funding (for PI and beyond...).</td>
</tr>
<tr>
<td>Patent reports rely on verification with a restricted view database (iEdison).</td>
<td>Audit risk. Potential inability to collect a report when faculty and fellows</td>
</tr>
<tr>
<td>Confirmation of subrecipient performance is often informal, through jointly</td>
<td>leave/retire.</td>
</tr>
<tr>
<td>written papers or conference calls.</td>
<td>Bottlenecks can occur, delaying submission. Opaque process makes ensuring</td>
</tr>
<tr>
<td>Duke’s A-133 audit does not currently include programmatic reporting, but</td>
<td>accuracy more difficult.</td>
</tr>
<tr>
<td>several of our peers’ do.</td>
<td>Language in UG requires process/documentation for acceptance of programmatic</td>
</tr>
<tr>
<td></td>
<td>reports from subs. Interpretation by agencies of new requirement is still</td>
</tr>
<tr>
<td></td>
<td>unknown.</td>
</tr>
</tbody>
</table>

Recommendations – A Phased Approach

- Phase 1: Communication and guidance
- Phase 2: Tool development to record due dates
- Phase 3 (?) Future centralized repository system

3-6 months 12-18 months 2+ years

Anticipated Regulatory Enforcement
Phase I: Raising Awareness (Fall 2015)

- Changes to Faculty Handbook clarify PI Responsibilities
- Additional guidance for GMs and Departmental Leadership on Responsibilities and Best Practices
  - Communications to be sent to Faculty, Business Managers, GMs and ORA/ORS/OSP detailing Roles & Responsibilities and Best Practices
- Next update of PI Attestation and Closeout Tasklist will include statements on programmatic reports

Programmatic Reporting

Departmental Responsibilities

- Work with Pre-award offices to collect any delinquent programmatic reports requested from sponsors in a timely manner.
  - If you receive a notification of a delinquent report, let Business Manager and ORA/ORS know immediately as there is institutional risk that needs to be assessed.

- Work with School/Mgmt Center on any cases that are not quickly resolved.
Programmatic Reporting

Departmental Responsibilities

• Facilitate submission of programmatic reports to OSP when required as part of financial reporting.

• Best Practices:
  – Confirm resolution of delinquent reporting requests with the Pre-award offices
  – Develop a methodology for tracking report submissions and monitor late submissions
  – Maintain copies or verification of report submissions
  – Develop an exit process for PIs leaving Duke that addresses programmatic reports

Programmatic Reporting

Grant Manager Responsibilities

• Understand programmatic reporting deadlines and requirements in order to assist PI with timely submission

• Escalate knowledge of any delinquent report submissions to departmental leadership

• Best Practices:
  – Review award notices for programmatic reporting due dates
  – Notify PI prior to due dates and request confirmation of submission
  – When possible, confirm with sponsor that all programmatic reports have been submitted at closeout
Reminders

• Communications will go out to Faculty, Business Managers, Grant Managers and Central Offices this Fall
  – Details Policy, Responsibilities and Best Practices

• Need to be aware of Programmatic Reporting deadlines

• Critical to communicate with Departmental Business Manager and Pre-award office if notified of delinquent programmatic report

Questions?
ORA News & Reminders

- Register in LMS at least 48 hours prior
- Print materials & bring to quarterly meeting
- Sign in at the beginning & wait for the code provided at the end of each quarterly meeting
- Respond to evaluation in LMS within 10 days

Email Rachel.Monteverdi@duke.edu if problems arise or if you have future meeting ideas

Future Quarterly Meetings

New meeting timeframe 1:30pm-4:00pm
Verifying Subrecipient FCOI

Two Options for Verifying Subrecipient FCOI at Time of Proposal

Option 1:
Send subrecipient the Proposal Subrecipient FCOI Certification Form for completion. Upload completed form into internal documents in SPS.

Option 2:
Subrecipient is registered at FDP Clearinghouse
http://sites.nationalacademies.org/PGA/fdp/PGA_070596
- Include note in proposal memo that subrecipient has a PHS compliant conflict of interest policy per FDP clearinghouse website
- Do not send Proposal Subrecipient FCOI forms to subrecipient

Note: FCOI Award Forms will still be needed at time of award and annually thereafter.

Application Submission System & Interface for Submission Tracking (ASSIST)

Have you ever had to fill out the Adobe SF424 application? Great news!

➢ ASSIST an option for most grant submissions to NIH

<table>
<thead>
<tr>
<th>Mechanism</th>
<th>NIH NOT</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>SBR/STTR</td>
<td>NOT-OD-15-156</td>
<td>September 17, 2015</td>
</tr>
<tr>
<td>Ts/K12/Ds</td>
<td>NOT-OD-15-126</td>
<td>July 20, 2015</td>
</tr>
<tr>
<td>U01s</td>
<td>NOT-OD-15-099</td>
<td>May 1, 2015</td>
</tr>
<tr>
<td>R01</td>
<td>NOT-OD-15-098</td>
<td>April 30, 2015</td>
</tr>
</tbody>
</table>

➢ If application package is not supported by Grants.Duke
- Complete ASSIST application in eRA Commons instead of completing Adobe forms.
- SPS entry is still required, but do not check the button for Grants.Duke (S2S)
CAS in the Age of Uniform Guidance

<table>
<thead>
<tr>
<th>Rebudgeting/CAS Form NOT Needed</th>
<th>Rebudgeting/CAS Form Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expense budgeted and justified in competing and non-competing application (when budget is required)</td>
<td>Expenses initially not budgeted and justified:</td>
</tr>
<tr>
<td></td>
<td>• No budget submitted</td>
</tr>
<tr>
<td></td>
<td>• Modular</td>
</tr>
<tr>
<td></td>
<td>• Need for expense identified after award</td>
</tr>
<tr>
<td>CAS line item can be less than SOM $500 threshold</td>
<td>CAS line item must meet the SOM $500 threshold</td>
</tr>
<tr>
<td>Considered approved by the sponsor</td>
<td>Prior approval from sponsor:</td>
</tr>
<tr>
<td></td>
<td>• Required for admin &amp; clerical salaries</td>
</tr>
<tr>
<td></td>
<td>• Not required for non-salary CAS expenses</td>
</tr>
</tbody>
</table>

Workflow Status Report for In-process Rebudgets

Have you ever wondered ‘Where is my Rebudgeting/CAS Form?’

Duke@Work /Finance tab/ Financial Reports/Workflow Status Report
Workflow status report for in-process rebudgets
(cont’d)

- Run query and select ERA
- Only Rebudgeting/CAS Forms that are active in workflow for the selected BFR.

Instructions:

If your PI has problems opening or approving please sit with them before contacting ORA for assistance. PI Step by Step and Web Setting instructions found here: https://finance.duke.edu/research/forms-resources/steps.php

SPS Status change: Submit
Don’t Touch This!

- ORA’s responsibility to monitor and change the status of SPS records
  - ORA changes the SPS record status to Submitted as part of our review and processing of the application
  - Department staff and/or PI’s should not select the “Submit” or “Mark as Submitted” button in SPS to change the status of the application

Department User View

SPS Inbox - Option to ‘Mark as Submitted’

SPS Record – Option to ‘Submit’ record
SPS Status change: Submit

Don’t Touch This!

(cont’d)

Principal Investigator User View:

- Remind PI’s of which systems are used for specific actions
  - PI’s ‘Release’ application in Grants.Duke
  - Do not ‘Submit’ application in SPS-web
- Grants.Duke redirects PI to SPS-web to complete the Enrollment Table
- PI’s may not realize they are in SPS-web and may see the Submit button, versus in Grants.Duke where they would see the Release button.

SPS Record – Option to ‘Submit’

Grants.Duke – Option to ‘Release for Submission’

Cost Sharing GAP 200.140

Definition:

Cost sharing or matching means the portion of a project costs not paid by Federal (Sponsor) funds.

- Mandatory Committed Cost Sharing
  - Sponsor requires specific cost sharing as part of the terms of the project
  - Must be included in application to be considered by the sponsor
    (e.g. sponsor requires 20% TC match)
- Voluntary Uncommitted Cost Sharing
  - Contributions above and beyond what was committed in the application to the sponsor
  - Specific commitments are not included in the application
    (e.g. overspending a project)
Voluntary Committed Cost Sharing
- Quantifiable financial commitments not required by the sponsor that are included in any part of the application
- Binding requirement if application is awarded
- Must be accounted for and reported as per Duke and Federal regulations
- Creates financial burden on departments/Duke and negatively impacts Federal F&A rate negotiations
  (e.g. PI committing effort with no salary)

Avoiding Voluntary Committed Cost Sharing
- Duke University and the Federal Government do not support voluntary committed cost-sharing unless required by the sponsor
  - Not expected and is not to be used as a factor in the review of applications or proposals unless clearly specified in a notice of funding opportunity (UG 200.306)
- Vague descriptions of commitments
  - No specifics! (dollar amounts or specific effort)
  - NIH recommends “as needed”
- Review Letter of Support, Statement of Work, Budget, Budget Justification, etc. that may include specific commitments
COGR addressing concerns related to cost sharing and other topics

COUNCIL ON GOVERNMENTAL RELATIONS
1200 New York Avenue, N.W., Suite 700, Washington, D.C., 20005
(202) 289-0555 (202) 289-1608 (FAX)

September 24, 2015

Ms. Karen Lee
Branch Chief, Office of Federal Financial Management
Gilbert Ezra
Office of Federal Financial Management
White House Office of Management and Budget
722 17th Street, NW
Washington, D.C. 20503

Dear Ms. Tran and Ms. Lee,

Thank you for your ongoing commitment to addressing concerns from the research community regarding 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, hereinafter referred to as Uniform Guidance (UG). For our phone call last week, we’d like to bring your attention to a number of deviations in agency funding announcements and award notices under the UG. COGR has encouraged member institutions to address these issues independently with the agency, providing updates to COGR on resulting outcomes. However, the number of deviations that have occurred have prompted the need to collectively bring this to your attention. We ask that OMB require its own implementation of 2 CFR 200.107 and take a more active role in managing their responsibilities “to ensure effective and efficient implementation”. We believe that the examples provided below clearly demonstrate a need for OMB to establish an emblazoned role to work with both recipients and Federal agencies to monitor and address these deviations from the UG and to maintain a systematic record of approved exceptions and the justification for those exceptions.

The following examples of exceptions have been reported by our members. We are not aware of any approval from OMB for any of these exceptions:

COGR addressing concerns related to cost sharing and other topics (cont’d)

SUZANNE RIVERA
Case Western Reserve University

PATRICK SCHLEISINGER
University of California, Berkeley

CATHY SNYDER
Vanderbilt University

PAMELA WEBB
University of Minnesota

DAVID WINSWOOD
Louisiana State University

KEVIN WOZNIAK
Georgia Institute of Technology

ANTHONY DE CHAPPE
President

200.306 Cost sharing or matching

Agency for Healthcare Research and Quality (AHRQ) – “This FOA does not require cost sharing. While there is no cost sharing requirement included in this FOA, AHRQ welcomes applicant institutions, including any collaborating institutions, to devote resources to this effort. An indication of institutional support from the applicant and its collaborators indicates a greater potential of success and sustainability of the project.”

http://grants.nih.gov/grants/guide/rfa-files/RFA-HS-15-001.html#sha256_e21A5e5b5d.m.pduf

National Endowment for the Humanities – “No cost sharing is required. NEH is, however, rarely able to support the full costs of projects approved for funding. If eligible expenses exceed the amount requested from NEH, an applicant may cover the difference and show this as cost sharing in the project’s budget.”

COGR addressing concerns related to cost sharing and other topics

US Department of Education, International and Foreign Language Education Program Office, Group Projects Abroad (GOA) - "GPA does not require cost share from the host institution however, GPA funds cannot be used for pre- and post-departure related expenses, and therefore any cost associated with these activities that are paid by cost share should be included in the budget and budget narrative."

Nuclear Regulatory Commission - Announcement of Opportunity Number: NRC-HQ-84-15-FOA-0002, CFDA #: 77.008 - "Cost sharing is not required for applications requesting up to $100,000.00 in total costs (i.e. direct costs plus facilities and administrative costs) per year. However, institutions are encouraged to leverage NRC funding to enhance the educational benefits of the NRC grant. Applications demonstrating such leveraging to further the goals of this announcement will receive additional consideration in the peer review process." http://www.grants.gov/web/grants/view-opportunity.html?oppId=275049

Environmental Protection Agency - No matching funds are required under this competition. Although cost-sharing/matching is not required as a condition of eligibility under this competition, under Section V of this announcement EPA will evaluate proposals based on a leveraging criterion. Leveraging is generally when an applicant proposes to provide its own additional funds/resources or those from third party sources to support or complement the project they are awarded under the competition which are above and beyond the EPA grant funds awarded. Any leveraged funds/resources, and their source, must be identified in the proposal (see Section IV of the announcement). Leveraged funds/resources may take various forms as noted below. Voluntary cost share is a form of leveraging. Voluntary cost sharing is when an applicant voluntarily proposes to legally commit to provide costs or contributions to support the project when a cost share is not required. Applicants who propose to use voluntary cost share must include the costs or contributions for the voluntary cost share in the project budget on the SF-424." http://www2.epa.gov/sites/production/files/2015-02/documents/eic_grant_rfa.pdf (pg. 8-9)

Department of Energy - "Cost sharing is not required. However, any planned cost sharing, such as partial institutional funding of tenures-track positions, should be indicated. Since one purpose of this program is to increase staffing levels in nuclear theory, joint funding and bridging positions are anticipated, and will be considered favorably in the proposal review process." http://science.energy.gov//media/grants/pdfs/foa/2015/SC_2015_000269.pdf (pg. 7)

Corporation for National and Community Service - The NOFA states "There is no cost share or matching requirement, but providing a match makes the application more competitive." http://www.nationalservice.gov/sites/default/files/documents/2015%20National%20Service%20Research%20NOFA_Amended.pdf (pg. 8)


USAID: "Cost-sharing is an important element of the USAID-recipient relationship. In addition to USAID funds, applicants are encouraged to contribute resources from own, private or local sources for the implementation of this program. There is no minimum or maximum amount of cost-sharing, but some amount is strongly encouraged, unless otherwise required by a Mission through an addendum or a request for application (RFA)." http://www.grants.gov/search-grants.html?agencies%3D%27USAID%27&country%255Fcode%255Fiso2%253DInternational%2520Development

Department of State, Public Affairs Section - "This program requires cost-sharing or matching on the part of the grantee organization and/or any partner institution. No specific level of cost-sharing is required, but applicants should demonstrate commitment to a successful program."

USDA- NCRS Regional Conservation Partnership Program: "An eligible partner shall provide a significant portion of the overall costs of the scope of the project, which will be reflected in the partnership agreement. The overall cost includes all
COGR addressing concerns related to cost sharing and other topics

**Just-in-Time (JIT) Request**

**Definition:**
NIH policy allows the submission of certain elements of a competing application to be deferred until later in the application process, after review when the application is under consideration for funding. Within the Status module of the eRA Commons, users will find a feature to submit Just-In-Time information when requested by the NIH. Through this module, institutions can electronically submit the information that is requested after the review, but before award.

**Some Common JIT Elements:**
- Other Support
- Certification/Verification of IRB and IACUC Approval
- Human Subject Education Requirements

**New JIT Element:**
- Genomic Data Sharing Institutional Certification
Just-in-Time (JIT) Request (cont’d)

**JIT Request Example** (excerpt):

1) Genomic Data Sharing Information.

   a) This application proposes to perform candidate gene variant genotyping and targeted metabolomics profiling on two HIV cohorts. To ensure that this project is compliant with the NIH Genomic Data Sharing Policy (see NOT-OD-14-111 and NOT-OD-14-124), please provide a Genomic Data Sharing Plan (GDS).

   b) See this link for a guidance document for investigators regarding the consent expectations under the GDS Policy and examples for data sharing plans.

   c) Please note that the GDS Policy expects that large-scale genomic research data from NIH-supported studies involving human genomic data are to be registered in the database of Genotypes and Phenotypes (dbGAP) before being submitted to an appropriate NIH-designated repository.

      i. Information on how to submit genomic data into dbGaP can be found at:


         https://www.youtube.com/watch?v=gIjN0Er39us&feature=youtu.be

   d) Provide GDS Extramural Certification.

      See https://gds.nih.gov/Institutional_Certifications.html for links to certification document required.

What Do I Need to do When a JIT Request Involves a Genomic Data Sharing Plan and Institutional Certification?

- Share JIT request with the PI immediately
- In consultation with PI, understand if Genomic Data Sharing involves one site (i.e., Single Site) or multiple sites (Multicenter Site):
  - Depending on the situation (i.e., Single vs. Multicenter Site), use the applicable Institutional Certification form (i.e., Single or Multicenter) and complete the form
    - Institutional Certification for Single Site Studies
    - Institutional Certification for Multicenter Site Studies
Just-in-Time (JIT) Request (cont’d)

- Utilizing the Administrative Action Request (AAR), select the “JIT” option and submit all applicable documentation to your assigned ORA RA
- ORA will review all documentation including the Institutional Certification form and verify the appropriateness of the information disclosed within the Institutional Certification form with the IRB
- Any issues/concerns on the part of ORA’s RA, the RA will communicate appropriately
- Assuming all documentation is appropriate, ORA will submit the JIT

F&A Waiver Policy

- Recently revised
- Published on Financial Services website

Refer to the following for more information:

- Current & Past Facilities and Administrative [F&A/Indirect Cost] Rates
  - School of Medicine’s F&A Rate Waiver Guidelines (.pdf)
- Current & Past Fringe Benefit Rates
When approved IRB/IACUC protocol is required
- JIT
- RPPR
- No Cost Extension - protocols should not expire before end date
- Supplement applications - verification required if using parent protocol
- Adding new personnel to a project
- Change in project SCOPE impacting human or animal subject use

Contact Information:
Jody Power, Director
Institutional Review Board
https://irb.duhs.duke.edu/

Dr. Ron E. Banks, Director
Office of Animal Welfare Assurance
http://vetmed.duhs.duke.edu

See ORA Website for Institutional Assurance and Certification Numbers
Altum proposalCENTRAL

- Organization/Institution: Duke University Medical Center
- Signing Official: John Michnowicz
  - Select by entering gcmail@mc.duke.edu in the search field
- Financial/Fiscal Officer: Nate Martinez-Wayman
  - Select by entering sponsoredprograms@duke.edu in the search field
- Official to be Notified if Awarded: John Michnowicz
  - Select by entering gcmail@mc.duke.edu in the search field
- Don’t forget to allow ORA access when possible
Duke Education & Training Opportunities can be found and registered at: http://finance.duke.edu/research/training/index.php


Professional Organizations:
- SRA Southern Section – New York, NY; February 28, 2016
- NCURA FRA & PRA - New Orleans, LA; March 6-11, 2016
- NCURA Region III – Miramar, FL; April 29 – May 4, 2016

Next RA Meeting Dates
- January 21, 2016 - 1:30PM*
- April 21, 2016 - 1:30PM*
ORA Personnel Update

- Departures

CAROLE TUCKER

Happy Retirement

- On Leave
  — Solita Denard

Questions?
Please state your name and department