Quarterly Research Administrator’s Meeting
Office of Research Administration
10/17/2019

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

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.

Thank you to all the Duke faculty and leadership who helped support development of this training:
Larry Carin, PhD
Francis Chan, PhD
Joel Cutler, PhD
Stephen Craig, PhD
 Compliance
Colin Duckett, PhD
Chra Frei, PhD
Amanda Harmon, PhD
Brent Hoffman, PhD
Sue Jinks-Robertson, PhD
Mena Kuehn, PhD
Billy Newton
Christopher Nicchitta, PhD
Sallie Permar, MD, PhD
Gerda Semrau, MD
George Truskey, PhD
Jenny Tung, PhD
Kent Weinhold, PhD

Payroll Cost Share – What’s New?
Nate Martinez-Wayman
Office of Post-Award Administration
WHY?

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

TODAY - iForms

<table>
<thead>
<tr>
<th>Cost Distribution - New</th>
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<td>Company</td>
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<td>POST AWARD ADMINISTRATION</td>
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TOMORROW - iForms

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TOMORROW – GM Tab

STEPS REQUIRED ONLY ONCE FOR DHHS SALARY CAP

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
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

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

### Key differences

<table>
<thead>
<tr>
<th>ISSUE</th>
<th>SBIR</th>
<th>STTR</th>
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<tr>
<td>LEAD PI</td>
<td>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</td>
<td>Primary employment of lead PI is not stipulated (can be 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)</td>
</tr>
<tr>
<td>TERM</td>
<td>Phase I: up to 6 months</td>
<td>Phase I: up to 1 year</td>
</tr>
<tr>
<td>IS COLLABORATION REQUIRED?</td>
<td>Allowed, but not required</td>
<td>Requires collaboration with a non-profit research institution</td>
</tr>
<tr>
<td>LIMITS ON SUBCONTRACTING DISTRIBUTION</td>
<td>Phase I - a maximum of 33% of the work may be subcontracted to third party</td>
<td>Phase I and Phase II - a minimum of 33% of the work must be subcontracted to a non-profit research institution (i.e., must be a formal collaboration)</td>
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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.

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.

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.
  - 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.
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).

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.

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.
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

Procedures – Department/Center

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

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.
Procedure – Award Stage

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

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.
Thank You

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

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

ORA Personnel Update

• Arrivals
  • N/A
• Departures
  • Mariah Codoley
• Openings
  • Training Coordinator
  • RA

Collaborate!

Invite us to your staff meetings...

and Supplemental Application Support!
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

Supplemental Application Support (SAS)

- 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

SAS Tool

Customizable list:
- Simple (excel)
- Deliverables
- Responsibility
- Deadline for each deliverable
SAS Eligibility

- Initiate with Intent to Submit
- New and competing applications
- 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

27 Requests!
13 Submissions!

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

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
### SPS UPDATE

#### Who Attests and When...

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

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

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

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

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 Status Updates: Submit
Please do NOT update SPS status to:

- Watch out for faculty editing SPS

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 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)
SPONSOR UPDATES

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.

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
• 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

[Link](https://nexus.od.nih.gov/all/2019/09/04/dont-forget-to-link-your-orcid-id-to-your-era-commons-profile/)
Update for OSCP coming soon!

11/19 Symposium session

Website content

PROFESSIONAL DEVELOPMENT
AND TRAINING UPDATE
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

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

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
LMS Credit Quarterly Mtg & Survey

- 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