Quarterly Research Administration Meeting

September 11, 2019
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• *Table Topics (1:00-1:30)*
  • *General announcements and updates*
  • Foreign Influence Workgroup
  • Active Protocol Search
  • Exempt Research
  • Kuali Research Award
  • C&G Accounting
  • Federal Update
  • Award Closeout - A Collaborative Effort
• *Table Topics (3:00-3:30)*
• October 9, 2019 10AM-3PM
• Student Center, Pacific Ballroom
• Register at technoexpo.uci.edu
• Visit Electronic Research Administration booth
• Join the conversation at Give a Hoot About Student and Research Administration Data Reporting & Analytics! booth
• All UCInetID@uci.edu email addresses are associated with the UCI Subscription!

• **Log in today at docusign.uci.edu**

• UCI employees (faculty, staff, and student employees) conducting higher education business activities may use UCI's subscription to:
  - view documents
  - sign documents
  - send envelopes to obtain signatures
  - create templates

• UCI students, non-employees, and UCI Health employees conducting patient care business activities may use UCI's subscription to:
  - view documents
  - sign documents
SPA Organizational Changes
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Active Protocol Search

• From Zot!Portal

• From OR Research Protections website
  https://www.research.uci.edu/compliance/index.html
DEMO
Questions?

Contact era@research.uci.edu
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Exempt Research at UCI

Beverley W. Alberola, CIP
Interim Director – IRB Operations
Office of Research
University of California, Irvine
Overview

• What is Exempt research?
• Is UCI IRB review needed?
• Yes, UCI IRB review is needed! (or is it UROP?)
• The UCI IRB Submission process for exemptions
What is Exempt Research?

- This is Human Subject Research!
- “Exempt” from federal regulations but not exempt from IRB review/confirmation
- Ensure research upholds Belmont Principles
- Federally-defined categories
- Verbal consent or no consent appropriate in most circumstances
- IRB Chair or Human Research Protections (HRP) Staff reviews and confirms Exempt status;

Research is registered for 3 yrs

- Examples:
  - anonymous or identifiable surveys or interviews
  - passive observation of public behavior with or without the collection of identifiers
  - retrospective and prospective medical chart reviews (allowable under specific criteria for UCI Healthcare Workforce)
  - analyses of specimens that are publically available or if not publically available, where the identities of the subjects cannot be readily ascertained
Is UCI IRB Review needed?

• First, confirm: is the study human subject research?
  • If not sure, review the Determination of Non-Human Subject Research Form
  • If written confirmation of non human subject determination is required, submit to the IRB for review at IRB@uci.edu
UCI IRB Review or Confirmation is Needed...

- It is human subject research!
- Confirm: Is the research part of an undergraduate UROP project?
  - If yes, be sure none of the exceptions apply.
  - If none apply, all UCI faculty-mentored undergraduate research involving human subjects that meets the criteria for exempt review must submit for exempt confirmation through the Undergraduate Research Opportunities Program (UROP).
UCI IRB Submission Process

• It is human subject research!
• Confirm: does the research activity meet one of the exemption categories?
  • Review the exemption categories.
  • Could the activity be confirmed via the Exempt Self-Determination Process?
    – If yes, researchers make their own confirmation.
• If UCI IRB review is required:
  – Submit an IRB Application, Exempt Protocol Narrative and Consent or Recruitment Materials as applicable – for UCI IRB exemption confirmation. (Be sure all engaged researchers have taken requisite trainings!)
Questions?

- Refer to the [HRP webpage](#)
- Review [HRPP policies](#)
- Contact [HRP Staff](#)
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What is KR Award?

• Integration piece between KR Pre-Award modules (Prop Dev, IP, and Negotiations) and Kuali Financial System (KFS)
• Will replace the Award functionality in SPA legacy system
  – Maximize integration between KR and KFS
  – No more “back and forth” to finalize award synopsis
• Utilizes a hierarchical structure instead of flat synopsis cycles
• Project includes data migration
• Go-Live Date: October 14, 2019
What does KR Award Go-Live mean?

• Award processing freeze for data migration
  – October 1 (EOD) SPA Officers stop processing awards
  – October 4 (EOD) C&G Accounting stops creating KFS accounts
  – October 7-11 TOTAL AWARD PROCESSING FREEZE
    • Senior leadership is aware and supportive

• As of October 14, 2019, SPA (and Applied Innovation) Officers will enter awards into KR Award
Data Migration

• **5 years** of Award data to be migrated from legacy database to KR Award
• Plus all awards tied to a KC/KR Proposal
• Plus all other **active** awards

• *Subawards* tied to those Award are also imported
Account and Fund Assignment

• Handoff from SPA to C&G Accounting occurs when KR Award Doc is finalized.
• No back and forth waiting for account and fund for SPA to finalize
Auto email notifications

This email is getting updated!

Award finalized email

The above referenced award was received and processed by UPA. In order to allow you to begin spending, some additional information is required to set up the account in the Kuali Financial System (KFS). To help expedite the account setup, please forward this message with the subject line intact to CSR Accounting (srccsrauth@uci.edu), and include the necessary information in the spaces provided below:

1. Award Account Number:
3. KFS Account for the continuation account:
4. PI/Principal Investigator:
5. Account Supervisor(s) (Dept/Division):
6. Account Manager (PI/Dept/Division):
7. If cost sharing is required, please provide the unrestricted KFS Account where the cost share expenses need to be charged.

For more information about setting up this award in the KFS, please contact the CSR Accountant responsible for this type of agreement http://www.researchuci.edu/CreditCodes/51674.

Award finalized email

This e-Sympo is for Award No. TEST-AWARD, Cycle No. 1 for the project entitled, "This is a TEST Proposal. TEST TEST. Please Ignore" funded by Land Trust for Santa Barbara County, under the direction of URC,NAMECO and available for viewing, printing and saving at:

http://apps.researchucdavis.edu/e-sympo/

At the prompt, enter the following information:

- Award Number: TEST-AWARD
- Sympo Cycle: 1

Instructions for viewing the e-Sympo:

To view the e-Sympo, please click on the URL above, which will take you to the e-Sympo Welcome page. Please click on the "Continue" button, then provide your (UCID) and password and click on the "Log in" button on the (UCID) Web Authentication form. This will take you to the e-Sympo page where you will be able to view the Award and Cycle. To view this...
NEW Award Transaction Summary (ATS) will replace old synopsis printout
Click on Award Search in ZotPortal or from the ATS email.
Reporting Source

• SPA Legacy Database is the current source for data
  – Data Warehouse Sponsored Projects Adhoc Query (aka BLISS)
  – Awards by Campus Area report
• After KR Award go-live, we will switch source to KR
  – For proposal *and* award data
• Data Warehouse / BLISS -> DWQuery
• Delay in data availability due to switch
  – Possibly three months
  – ERA can assist with urgent data needs
Biggest Impact...

- Remember, this is a new system for award entry
- Impacts SPA and AI Officers the most!
- Also impacts C&G Accounting
- ….so…
In conclusion...
Contact ERA for questions or help at era@research.uci.edu
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Contracts & Grants Accounting Update

Beata Najman
Agenda

- PCS Upgrades - Final Release Expected on September 21st
  - Salary expense details included for all PCS reports
  - Closer monitoring of recertification requirement for all salaries previously certified but later changed by 5% or more. New report to be run each month by C&G Compliance.
- KR-KFS Integration and Testing
- UC Path Report for C&G Funds
- New Cost Sharing System – Expected in January 2020
- New Online Cost Transfers Training Modules – Expected in UCLC in February 2020
- NSF Site Visit
- C&G Accounting Post-Award Administration Website Updates
- MCA vs. MLA
Direct Costs: Salaries and Wages

Most commonly budgeted compensation costs include salaries, wages and benefits of Principal Investigators (PIs), Postdoctoral Researchers, Graduate Student Researchers (GSRs), Research Associates, Technicians, and other employees that directly further the goals of the project. All salaries and wages must be based on records that accurately reflect work performed, be reasonable for work performed, comply with the established UCI policies and procedures, and be consistently applied to both government and non-government activities.

Where grant recipients work on multiple grant programs or cost activities, documentation must support a reasonable allocation or distribution of costs among specific activities or cost objectives.

Additional Resources
- Uniform Guidance, 200.430 Compensation—Personal Services
- Contract and Grant Manual, Chapter 7.300, Justification and Documentation of Expenditures
- UCI Office of Research – Salary and Wages

PI and Other Key Personnel

The approved budget specifies the salaries of the PI and other key personnel, and their measurable effort dedicated to the project.

The PI must ensure that the sufficient levels of effort are committed to the project, and is required to request prior approval for the following changes in effort.
MCA

- Subcontract agreement between two UC campuses is processed by SPA
- Invoices submitted to Contracts and Grants Accounting using intercampus billing process and Intercampus Reimbursement Requests (IRRs)
- Payments processed by Contracts and Grants Accounting
- Payroll posts into DW Payroll/ DOPE/ Labor Ledger of the UC campus which processed employee’s appointment and is accounted for in effort reporting system or payroll certification system of the UC campus of record.
Multi-Location Appointment (MLA)

MLA - NOT Allowed on Contracts and Grants

- Employee with an appointment at one UC campus works on an assignment at a different UC campus
- Salary transfer between two UC campuses processed by Human Resources and Payroll
- Payment processed using intercampus appointment journals
- Payroll posts into GL and it is not reflected in PCS, and it is not reflected in the effort reporting systems on campuses that use this form of salary verification.
Questions?
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Federal Updates: 2018 Farm Bill

Karina Ramirez
Contract and Grant Officer
Karina.r@uci.edu
(949) 824-3029
NIFA Update: 2018 Farm Bill and its Impact on Research

• Signed into law, December 20, 2018

• The match requirement will vary by program
  – https://nifa.usda.gov/matching-requirement

• Certain RFAs limit indirect costs for the overall award to 30% of Total Federal Funds Awarded (TFFA)
Indirect Cost Recovery Change

• The maximum indirect cost rate allowed under the award is determined by calculating the amount of indirect costs using:
  – Prime: Lesser of negotiated rate or 30% TFFA
  – Subs: Lesser of negotiated rate or 30% TFFA
  – TFFA (Total Federal Funds Awarded = Field K, Total Costs and Fee, on SF-424 R&R Budget)

• Total F&A requested (UCI’s F&A + all subaward F&A) must be less than 30% TFFA
Resources

– NIFA’s

– FDP: http://thefdp.org/default/assets/File/Presentations/NIFA%20FDP%20presentation%20-%20May%202019.pdf
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Cause of overdue reports?

- Procrastination by PI
- Lack of oversight by Post Award Admin
- PI unavailable / unreachable – i.e. left institution
- 3 occurrences at Bio Sci
NIH enforcement

- **NOT-OD-18-107**
  In order to fulfill agency requirements under the Grants Oversight and New Efficiency (GONE) Act and HHS grants policy, NIH will no longer delay the closeout of awards unless the recipient submits a prior approval request to the IC providing an acceptable written justification. Without prior approval from the awarding IC, NIH will initiate unilateral closeout for all awards that fail to meet closeout requirements within 120 days as required by the NIH Grants Policy Statement (NIH GPS) Section 8.6.
NIH Grants Policy Statement
8.6 Closeout
The requirement for timely closeout is generally a recipient responsibility. However, NIH may initiate unilateral closeout if a recipient does not provide timely accurate closeout reports or does not respond timely to NIH requests to reconcile discrepancies in grant records. Failure to submit timely and accurate closeout documents may affect future funding to the organization. Failure to correct recurring reporting problems may cause NIH to take one or more actions that may include, but are not limited to, corrective actions, withholding or further awards, suspension or termination.
Closeout Enforcement

NIH is strengthening enforcement of longstanding closeout requirements.

- Recipients must submit timely, accurate closeout reports
- Reports are LATE after 120 calendar days
  - NIH may allow late submission with prior approval (i.e., acceptable written justification)
  - Cash transaction data is submitted directly to PMS
  - Recipient responsibility to reconcile FFR and FCTR data

When recipients fail to submit timely reports NIH will initiate unilateral closeout.

- When no FFR is submitted, HHS policy directs NIH to close the grant using the last accepted FCTR
- This could be considered a debt or result in disallowed costs

See NOT-OD-18-107
Implemented Changes

• The Pre-Awards staff will provide a list of ending projects a month in advance to the Post Award analysts.

• When the project ends, the Post Award analysts will initiate the closeout process by emailing the PI/faculty the final report due date, payroll report download and recent PI report.

• This email will copy the Pre-awards staff and the respective Department Manager.

• The Pre-Awards staff will then monitor the progress of the report and advise the PI on the requirements of the report.

  (i.e. FIS needs to completed by PI and verified by SPA before due date)
Implemented Changes cont…

• 2 weeks before deadline, Associate Dean for Research emails PI
• 1 week before Deadline - Personal visit to PI
  aka initiate “Manhunt and Quarantine” protocol
• Once the PI has completed the report, the Pre-Awards staff reviews for accuracy and consistency.
• The Pre-Awards staff will provide a copy of the report to the PI and the Post award analyst for their records.
• Xtrain – Termination notices
Results from Implementation

• Submission of final RPPR well before the 120 day deadline

• Post Award administration more cognizant of deadlines and requirements

• Same practices followed on annual / interim RPPRs and other Federal/ Non-Federal reports
Jason Park – jpark@uci.edu  Megan Vu – vum@uci.edu
https://research.bio.uci.edu/
Final Questions?
See you next time...

December 18, 2019
Moss Cove AB
1:00-3:30
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