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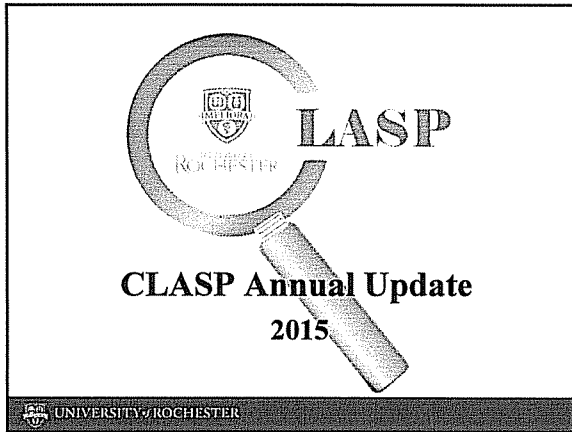
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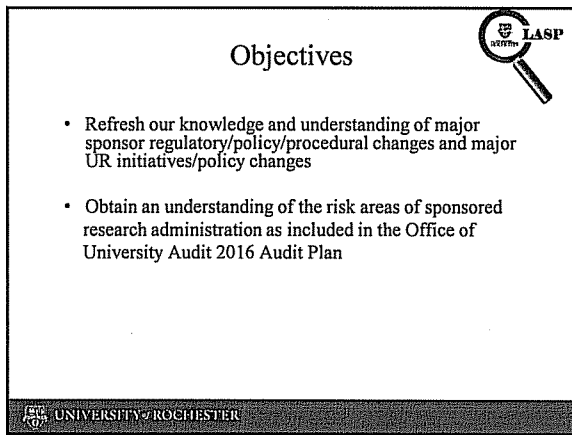
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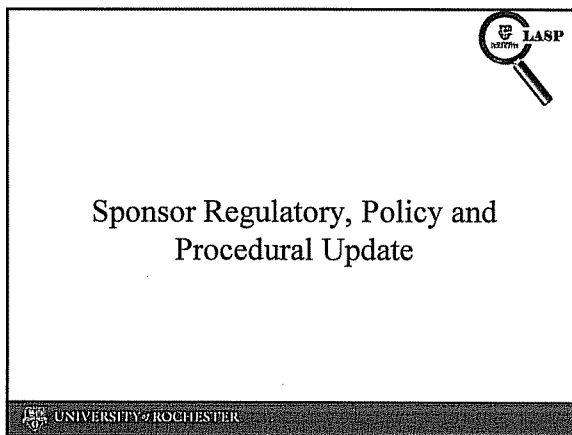
- Chronological Listing of ORPA-Ls January 2015 – November 15, 2015
- Categorical Listing of ORPA-Ls January 2015 – November 15, 2015



The slide features a large magnifying glass graphic on the left. Inside the lens is the University of Rochester crest and the text 'UNIVERSITY OF ROCHESTER'. To the right of the lens, the letters 'CLASP' are written in a large, bold, serif font. Below the magnifying glass, the text 'CLASP Annual Update' is centered, with '2015' centered below it. At the bottom left of the slide is the University of Rochester logo and the text 'UNIVERSITY OF ROCHESTER'.




The slide has a title 'Objectives' centered at the top. To the right of the title is a small magnifying glass icon with 'CLASP' written next to it. Below the title is a bulleted list of two objectives. At the bottom left of the slide is the University of Rochester logo and the text 'UNIVERSITY OF ROCHESTER'.



The slide has a title 'Sponsor Regulatory, Policy and Procedural Update' centered in the middle. To the right of the title is a small magnifying glass icon with 'CLASP' written next to it. At the bottom left of the slide is the University of Rochester logo and the text 'UNIVERSITY OF ROCHESTER'.

**Sponsor Regulatory, Policy
and Procedural Update**



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National Institutes of Health (NIH)

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**Final Financial Report (FFR) and
Payment Management System (PMS)
deadlines**



- The deadline for submitting the final FFR in the Commons and the deadline for drawing funds from the PMS are now in synch at 120 days.
- This enhancement ensures that grant recipients may draw funds from the PMS up to the date that the final FFR is due to NIH.

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NIH application and instructions changes



- Implementing Rigor and Transparency: NIH is revising the grant application instructions to clarify long-standing expectations to ensure NIH is funding the best and most rigorous science; highlight the need for applicants to describe details that may have been previously overlooked; highlight the need for reviewers to consider such details in their reviews through revised review criteria; and minimize additional burden.
- The anticipated effective date of these changes will be for applications submitted for the January 26, 2016 due date and thereafter.

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Reporting publications in RPPR



- NIH amended the instructions for reporting publications in the RPPR progress report.
- NIH can only systematically link publications to awards if those publications were reported to NIH electronically using RPPR or SNAP.
- These linkages are not in place for publications that were reported to NIH on paper forms, such as the PHS 2590 forms.
- Awardees are encouraged to electronically report any publications found in Table 1 of the RPPR which were previously reported on paper forms. This one time measure will ensure that NIH systems can store all appropriate award-publication associations.

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National Science Foundation (NSF)



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Automated Compliance Checking



- Proposals submitted in response to Program Solicitations in FastLane now undergo a series of automated proposal compliance validation checks to ensure they comply with requirements outlined in the Proposal & Award Policies and Procedures Guide (Chapter II.C.2. of the Grants Proposal Guide (GPG)).
- These checks automatically validate a proposal for compliance against proposal sections per type of funding mechanism. For example, an error message will appear if a project description or budget are not provided in proposals submitted in response to a Program Solicitation.

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Automated Compliance Checking



- Checks will be triggered in FastLane when proposers select the "Check Proposal," "Forward to SPO," or "Submit Proposal" functions.
- Depending on the rule being checked, a warning or error message will display when a proposal is found to be non-compliant.
- If an error message appears, the proposal cannot be submitted until it is compliant.
- These automated compliance checks will not be conducted on proposals submitted to NSF via Grants.gov.

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Development of a Public Access Policy



- In response to the Office of Science and Technology Policy's Feb. 22, 2013, memorandum, "Increasing Access to the Results of Federally Funded Research," The National Science Foundation has developed a plan entitled "Today's Data, Tomorrow's Discoveries," which outlines a framework for activities to increase public access to scientific publications and digital scientific data resulting from NSF funded research.
- This NSF requirement will apply to new awards resulting from proposals submitted, or due, on or after the effective date of the *Proposal & Award Policies & Procedures Guide (PAPPG)* that will be issued in January 2016.

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Federal, Non-Agency Specific



2 CFR 200 Uniform Guidance

- Implementation of the Procurement Standards, 200.317 through 200.326, has been extended for one year.
- For most Institutions of Higher Education, this means the effective date will be July 1, 2017 (i.e., FY2018).
- The extra year will allow the community to engage with OMB to address issues such as the micropurchase threshold and other related issues.



2 CFR 200 Uniform Guidance

200.413 Direct Costs, (c) relating to administrative and clerical salaries

"Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project or activity;
2. Individuals involved can be specifically identified with the project or activity;
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
4. The costs are not also recovered as indirect costs."

2 CFR 200
Uniform Guidance



200.463 Recruiting Costs

- Requirement to repay if employee resigns within twelve months after hire
- Short-term visa costs (as opposed to longer-term, immigration visas) are generally allowable.
- Short-term visas are issued for a specific period and purpose and should be clearly identified as directly connected to work performed on the award.
- Must be critical and necessary for the conduct of the project

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2 CFR 200
Uniform Guidance



200.331 Requirements for Pass-Through Entities

- Sponsors (agency and pass-through) are obligated to honor a subrecipient's negotiated F&A rate.
- Subrecipients without a negotiated rate can get an automatic 10% MTDC F&A rate or can negotiate a rate with the pass-through entity (NIH limits rate to 8% for foreign entities).
- Agency prior approval is required before using fixed price subagreements.
- New limit on size of fixed price subagreements (\$150,000)

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Uniform Guidance



Research Terms and Conditions (RTCs)

- RTCs probably won't be finalized until summer/fall 2016.
- Agencies have implemented interim terms and conditions, which will differ with regards to prior approvals.

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Major UR Initiatives / Policy Changes

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Major UR Initiatives / Policy Changes

- F&A Rate Agreement
- UR Financials
- Closeout Process
- On-Campus, Off-Campus Overhead Rates
- SPINplus replaces PIVOT
- Submission of NIH RPPR by faculty
- Library assistance
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F&A Rate Agreement

Organized Research (ORG) rates for sponsored projects awarded, by period:

Type	Effective Period	On-Campus ORG Rate %	Off-Campus ORG Rate %
PREDETERMINED	July 1, 2014 to June 30, 2015 (*)	33.5	26.6
PREDETERMINED	July 1, 2015 to June 30, 2017	33.5	27
PREDETERMINED	July 1, 2017 to June 30, 2019	34	27
PROVISIONAL	July 1, 2019 until amended	34	27


Other Sponsored Programs (OSP) rates for sponsored projects awarded:

Type	Effective Period	On-Campus OSP Rate %	Off-Campus OSP Rate %
PREDETERMINED	July 1, 2014 to June 30, 2015 (*)	33.5	24.8
PREDETERMINED	July 1, 2015 to June 30, 2019	35	25
PROVISIONAL	July 1, 2019 until amended	35	25


- (*) The periods are complete at the time of this notice.
- For ORG awards extending beyond 6/30/19, the 34% rate will apply to all successive years of the project period.
 - Beyond June 30, 2019, use the FY19 rate as provisional for both ORG and OSP, until amended.

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F&A Rate Agreement




- For BOTH On and Off-Campus awards signed prior to July 1, 2014, the F&A cost rate remains at the effective rate for the competitive segment.
- Competing continuation awards will be subject to the new predetermined rates.


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F&A Rate Agreement

On-Campus projects signed after June 30, 2014:




- ORG awards will maintain the 53.5% rate (exclusive of training grants, fellowships or other awards not entitled to full research rate reimbursement) for the period from the start of the award through June 30, 2017 and change to 54% for fiscal 2018 through the life of the project period.
- OSP awards will maintain the 33.5% rate (exclusive of other awards not entitled to full other sponsored activity rate reimbursement) for the period from the start of the award through June 30, 2015 and change to 35% for fiscal 2016 through the life of the project period.


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F&A Rate Agreement

Off-Campus projects signed after June 30, 2014 :



- ORG awards will maintain the 26.6% rate (exclusive of other awards not entitled to full research rate reimbursement) for the period from the start of the award through June 30, 2015 and change to 27% for fiscal 2016 through the life of the project period.
- OSP awards will maintain the 24.8% rate (exclusive of other awards not entitled to full other sponsored activity rate reimbursement) for the period from the start of the award through June 30, 2015 and change to 25% for fiscal 2016 through the life of the project period.

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F&A Rate Agreement



- The predetermined rates should be used in preparing proposal budgets for future years. For example, a new or competing research award that starts July 1, 2015 will be subject to a 53.5% rate for two budget years (through fiscal year 2017) and 54% rate for the remaining subsequent years.
- ORACS will apply the applicable rates to the Award lines (Grants) within UR Financials as those rates change.

UR Financials




- All Manual Journal Forms (previously Cost Transfers) need to utilize the new Manual Journal Form. The form has the same requirements for purpose statements and second signature as the previous Cost Transfer Form.
- All Manual Journal Forms need to go to the respective Company (previously Divisional) Finance Offices. Should a Journal cross Companies the routing for approval will take place via URFinancials. Approval by ORACS will also be handled electronically through URFinancials. Supporting data needs to be included/attached.

UR Financials





- Intercompany Spend Category is not to be used for sponsored awards. For clarification, the Spend Category utilized should always reflect what the expense was, not from where it came.
- The new Spend Category for IRB/WIRB/RSRB fees is SC48525.
- When a clinical trial sponsor is the federal government, patient care charges (hospital, professional, URMC Labs, Imaging Sciences/Radiology) are valued using the Research Patient Care Rate Agreement factors as appropriate, and Spend Category SC48500 (Human Subjects Outpatient Service Charges) is to be used for those expenses.
- When the study sponsor is not the federal government, Spend Category SC48450 (Human Subjects Other) is to be used for the respective patient charges (hospital, professional, URMC Labs, Imaging Sciences/Radiology).

UR Financials 

Award Budgetary Balance Summary (NCL) URF0840


- This is an **AWARD** report, therefore the data is not specific to a Grant or multiple Grants that are attached to the Award.
- This report is sourced off the Budget, which is attached to the Award. Therefore, if the Award in question does not have a Budget it will not return any data.
- The data that returns is based on the **BUDGET PERIOD**.
- The actual expenses are those recorded with a **BUDGET DATE** in the **BUDGET PERIOD** you selected when running the report. Therefore, if a transaction (supplier invoice) was processed through AP in January and the Budget Date of the invoice (the date the service was performed or the goods received) was mid December, the actual expense will show in December.


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UR Financials 

Award Budgetary Balance Summary Printable (NCL) URF0987


- This report is specific to a Grant or multiple Grants that are attached to the Award, therefore will return all awards including industry sponsored clinical trials.
 - Contingent Grants not included, users must run the Manager Financial report (CD391)
- The data that returns is based on the **Accounting Period**
- Use the Schedule a Report task to output this report to an Excel template with a macro for generating a PDF with page breaks by award or grant
- Subtotaled by Direct and Indirect Cost
- Includes Grant Life to Date and Conversion Amounts
- Similar to FRS Ledger Report FBM090


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UR Financials 

Transaction Details Printable (NCL) URF0985


- Transaction details with a business form layout attached for outputting to PDF with headers, subtotalling, and page breaks. Run the report and click Print, or schedule with an output type of Business Form (PDF)
- The data that returns is based on the **Accounting Period**
- Subtotaled by Direct and Indirect Cost
- Includes Award Name
- Includes PI Name
- Similar to FRS Transaction Detail Report FBM091


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Closeout Process


- The ROE has been replaced with a Expiring Award Term List Notice (Notice) that you will receive via email from your ORACS Staff Accountant.
- When you receive that Notice, generate the Award Line Summary of Funds (NCL) URF0983 Report to clarify expenses recorded on your portfolio of Terminating Awards (this report allows for multiple Awards).
 - Coming Soon: revised term notice report
- Once generated, the "Actual" columns Monthly/FYTD/GLTD totals are drillable.


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Closeout Process

- The financial data in UR Financials needs to be confirmed to the ORACS staff accountant at least 30 days prior to the reporting deadline indicated in the sponsored award.
- Once confirmation is received, ORACS will provide a final report and invoice to the sponsor for any unpaid amounts on the report (if any and if needed).


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Closeout Process

Award Closeout Steps for Success

<p>ORACS</p> <ul style="list-style-type: none"> • Generate Expiring Award Term List URF0673 (sorted by PI) • Send email to PI/Admin with relevant info included • Receive and review PI/Admin response to closeout • Complete Final Report and Perform Final Invoicing to match 	<p>Department</p> <ul style="list-style-type: none"> • Review Expiring Award Term List URF0973 on a PROSPECTIVE basis • Generate Award Line Summary of Funds (for terminated Awards) • Meet with PI to discuss expenses • Notify ORACS of proper expenses, ensure those improperly charged are removed and all expenses are recorded in URFinancials
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Closeout Process



- The standard reporting deadline of 90 days after budget termination date requires ORACS to begin reporting approximately 30 days in advance.
- Therefore ORACS requires a 30 day notice if you are NOT in agreement with the amounts included on the Financial Statement/Manager Financial Report.

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On-Campus, Off-Campus Overhead Rates



- **On-Campus**
 - Research conducted in space owned by the UR and for which the UR is bearing the space costs from UR funds
 - Includes space/locations where the sponsor is not charged directly for lease cost (rent) but the UR is paying lease costs.
- **Off-Campus**
 - Research conducted in space not owned by UR and not otherwise paid for by the UR from UR funds
 - An external source provides funding, either paying directly for the space, reimbursing the UR for its rent/lease cost, or providing space for research at no charge to UR

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On-Campus, Off-Campus Overhead Rates



- Use the rate applicable to the location where the preponderance of time and effort will be expended (e.g., more than 50% of the time and effort).
- When more than 50% of UR time and effort is performed on-campus, then the on-campus rate applies.
- When more than 50% of UR time and effort is performed off-campus, the off-campus rate applies.
- Each contract or award is assigned only one indirect cost rate.

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On-Campus, Off-Campus Overhead Rates



- Prior to submitting a proposal, the PI, in consultation with Department Chair, must determine whether the preponderance of University time and effort will occur on-campus or off-campus over the life of the project.
- Determine the preponderance of effort by examining the time and effort that the UR project personnel spend working on project activities in on-campus vs. off-campus locations.
- Subawards and vendor agreements should not be considered.

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SPINPlus replaces PIVOT



- The University replaced the PIVOT funding opportunities and collaboration software product with the SPINPlus product marketed by InfoEd Global.
- The SPIN/SMARTS/GENIUS was the product used for a number of years by the University prior to the switch to PIVOT.
- For those unfamiliar with SPINPlus there is information on how to get started on this website:
www.infoedglobal.com.


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Submission of NIH RPPR by faculty




- The authority to submit (via the eRA Commons) Research Performance Progress Reports (RPPR) for select NIH awards is now delegated to the PD/PIs of those awards.
- This authorization applies to awards subject to the Streamlined Non-Competing Award Process (SNAP).
- This change in University procedure means ORPA no longer conducts a prior review and approval of, and no longer requires an internal sign off for, these report submissions.


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Submission of NIH RPPR by faculty


- The associated ORPA RA will receive an email from the Commons post submission.
- At that point, the ORPA RA will conduct a streamlined post-submission review to identify any grants management issues that may impact the award going forward.
- If the ORPA RA has any questions concerning the information included in the RPPR report during that post submission review, the ORPA RA will contact the PD/PI and/or the Departmental Research Administrator.


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Library assistance


- River Campus Library is available to assist researchers in complying with funder requirements for public access, such as:
 - writing data management plans
 - providing public access to publications and data.
- Kathleen Fear, Data Librarian, is positioned to assist as are the Outreach Librarians.
- Information can be found using this OSTP libguide: <http://libguides.lib.rochester.edu/publicaccess>.


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Library assistance


- Likewise, Edward G. Miner Library librarians are available to assist researchers at the Medical Center with:
 - NIH requirements for public access
 - writing a data management plan
 - building a SciENCv
- The contact is Linda Hasman or your department's librarian liaison.

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CIRC/HSCCI fee structure 

- A memo dated July 1, 2015, announced a new policy for recovering the costs of the Center for Integrated Research Computing (CIRC) intended to share equally the cost of CIRC between investigators and the institution.
- A \$2,000 fee is applied only once per Principal Investigator per year. PIs are responsible for allocating this fee among their projects based on usage.
- Requests for waiver of the CIRC fee must be explained and justified and must be approved by the applicable Dean for Research (Steve Dewhurst or David Williams).


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Effort Reporting Policy Updates 

Summer Research Effort

Acknowledgement that a faculty might need to re-budget summer period award funds, and seek to reduce or eliminate their summer pay

- If a reduction of effort is actually planned, ORPA is to be notified to obtain sponsor approval for the reduction.
- If effort will be expended – but not paid – certification of the effort spent will be requested of the PI.


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Effort Reporting Policy Updates 

Required Control - Appendix

Comparison of Principal Investigator committed effort, actual effort, reported effort is to occur three (3) times per year.

An exception exists for Principal Investigators with only non-federal clinical trials in their research portfolio.

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Effort Reporting Policy Updates

Certification

Each individual must certify their own effort unless extenuating circumstances exist.

Exception: post-doctoral individuals and graduate students

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Closeout of Clinical Trials


- As per the UR Clinical Research Standard Operating Procedures Regarding Financial Oversight and Billing Compliance (specifically SOP 5.2), a Close Out Checklist is to be provided to ORACS (and possibly the Dean's Office) at the time of clinical trial account close out.
- The Close Out Checklist is to be completed when closing out a trial that was budgeted using the UR Budgeting Workbook and whose transactions were then monitored through use of a UR *Post Award Workbook* ("PAW").
- If you are unsure whether an account needs a Close Out Checklist, you may contact Mike Ritz or Terese Mason.

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Joint Appointments (VA and UR)


- If a faculty member has an appointment at the VA and the UR, a Memo of Understanding (MOU) must be written and signed by both parties.
- A standard MOU template must be used (contact Mike Ritz).
- The MOU must be updated whenever there is a change to either the VA appointment or the UR appointment.
- ORPA will request a MOU whenever a sponsored project is to be submitted to a sponsor with an investigator who has a joint VA and UR appointment.

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Audit Environment






Audit Environment

- **Office of University Audit 2016 Audit Plan**
 - Full-Scope Sponsored Research Audits
 - University-Wide Sponsored Research Audits
 - Other Relevant Audits






Office of University Audit FY2016 Audit Plan

Full-Scope Sponsored Research Audits

▪ Conflict of Interest	▪ Effort Reporting
▪ Cost Sharing	▪ Financial Management
▪ Cost Transfers	▪ Project Administration
▪ Direct / Indirect Costs	▪ Subcontracts



Office of University Audit FY2016 Audit Plan



University-Wide Sponsored Research Audits:

- Service Centers
- Effort Reporting Policy Compliance

Other Relevant Audits:

- Controls Over Departmental URF FAOs
- In-depth Departmental Financial Transaction Audits

Personnel Action Form (PAF) Effort Certifications	Annual Plan Confirmation System Review (PCSR)
<p>Purpose: To fulfill the University effort certification requirement</p>	<p>Purpose: To fulfill the University system test requirement</p>
<p>Effort certifications on PAFs are <i>in addition</i> to the preparer and recommending officer signatures and are required once every 12 months</p>	<p>The annual PCSR IS NOT the same as the federal certification of effort</p>

Questions?