Agenda

- NCURA – Internal Controls
- Mike Unplugged:
  - Training/Education Specialist position
  - Budgeting for Post-doc increases
  - FDP Update
  - ETS Update
- Effort Reporting: UG
- NIH Continuous Submission Eligibility
- Appendix Material Changes
- NIH and NSF Updates
NCURA: Internal Controls for RAs

*Internal Controls for Research Administrators*: What does the Uniform Guidance’s 100-Plus-Times Reference to “Internal Controls” Mean for Your Institution?

**Wednesday, September 21st at 2:00 pm**

400 Farmington Avenue

**DESCRIPTION:**

- What are internal controls and what do they mean to research institutions? There is a vastly increased emphasis on internal controls in the Uniform Guidance, which has led research institutions to reassess their approach for documenting and assessing their sponsored research internal controls.

- This webinar will discuss how the Uniform Guidance defines “internal controls,” describe the application of the COSO framework as a standard for internal controls, and provide an example of how a research institution is taking a proactive approach in documenting and evaluating its internal controls over sponsored research within the COSO framework.
Mike Unplugged:

• OVPR Education & Development Specialist
• Budgeting for Post-Doc salary increases:
  - Effective 12/1/2016, the standard level to qualify for exemption from minimum wage and overtime requirements will increase to $47,476/year.
    1. All submitted proposals must include budgets that reflect the new minimum salary requirements;
    2. Existing projects will be provided support for the difference between the current salary and new federal threshold.
• FDP Update – Fall 2016
• ETS Update
Effort Reporting

What is Effort?
• The percentage of time devoted to an activity in relation to the total time spent on ALL work-related activities;
• Includes all University activity, including time spent on sponsored projects and other activities (patient care, instruction, administration, NIH study sections, etc.);
• Effort on all activities totals 100% for every employee, whether the person is full- or part-time, faculty or student.

What is Effort Reporting?
• A retrospective assurance that the time committed and/or budgeted corresponds to the time spent and effort invested on a given sponsored project for a specific period.
Why Do We Report Effort?

• Federal government regulations require strong internal controls to ensure that salaries and wages charged to grants align with and are supported by the actual hours worked.

• Office of Management and Budget’s (OMB) Uniform Guidance sets the requirements for federal projects, which are in turn used as the guidelines for all sponsored projects.
What is the standard? A-21 v. UG

Old: A-21 Section J.10.b(2)

- A system of allocating salaries based on effort that is *incorporated into the official records* of the institution.
- Must *reasonably reflect the activity* of the employee.
- May be made on the basis of estimates, but *significant changes must be identified and entered* into the payroll system.
- An after-the-fact confirmation by a responsible person with suitable means of verification that the work was performed.

New: CFR 200.430 (h)

- Charges must be supported by a system of internal controls which *provides reasonable assurance* that charges are accurate, allowable and allocated.
- Must be *incorporated into the official records* of the entity.
- Must *reasonably reflect* the total activity for which the employee is compensated.
- Internal controls must include a process to review after the fact interim changes made to a Federal award.
UG – Estimates are OK:

There is recognition in Uniform Guidance that some level of estimating is acceptable:

– §200.430(i) Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

  – (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities;

  – (x) It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs, a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.
UG – Estimates are OK, But Beware of Internal Controls!

§200.430 (i) Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

– (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;

– (vii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:

  (B) Significant changes in the corresponding work activity (as defined by the non-Federal entity's written policies) are identified and entered into the records in a timely manner.

  (C) The non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal awards based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.
UG –Estimates are OK, But Beware of Internal Controls! (cont).

§200.303 Internal Controls:
(a) Must maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and terms and conditions. These controls should be in compliance with COSO and/or “Internal Control Integrated Framework”
(b) Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards.
(c) Evaluate and monitor the non-Federal entity’s compliance with statutes, regulations and the terms and conditions of Federal awards.
(d) Take prompt action when instances of noncompliance are identified, including noncompliance identified in audit findings.

§200.430 (i) Standards for Documentation of Personnel Expenses

(8) Compensation For a non-Federal entity where the records do not meet the standards described in this section, the Federal Government may require personnel activity reports, including prescribed certifications, or equivalent documentation that support the records as required in this section.
Effort Reporting – The Scary Slide!!

Penalties:
- Yale - $7.60 million
- Northwestern – $5.50 million
- Johns Hopkins $2.60 million (*One PI*)
- East Carolina U. - $2.6 million
- Harvard/Beth Israel - $3.25 million

Findings:
- Business Managers certifying effort for employees...without a suitable means of verifying effort;
- Defining 100% “professional effort”;
- Number and appropriateness of cost transfers;

UCH Findings:
- Effort reports not certified on a timely basis become questioned costs and therefore material findings;
- PI certifying 99% effort on research activities;
- PI sharing passwords;
- Cost transfers after effort is certified – *what was the basis for the certification in the first place?*
Effort Reporting: Certification

• Effort certification is UCH’s means of assuring sponsors that:
  – The commitment of effort to the project was met;
  – The effort expended on the project was at least commensurate with the salary charged;
  – Effort devoted to research and other sponsored projects was properly accounted for.

• This is not “timekeeping” or “activity tracking”
  – Researchers are not required to “report how they spent their time”;
  – Effort is not based on a 40 hour work week, but 100% of institutional effort.

Who Should Certify?

A-21 J.10c.(2)(e) At least annually a statement will be signed by the employee, principal investigator, or responsible official(s) using suitable means of verification that the work was performed...
Effort Reporting Dos (and some Don’ts) for Department Administrators

• **DO: Manage your commitments:**
  – Verify commitments in ETS when projects are awarded;
  – Review interim distribution reports report and Banner to ensure that all commitments are accurate and all payroll was processed correctly.

• **DO: Review your reports:**
  – Review your reports quickly after they are issued; reject any with issues immediately. If you have a question or concern, contact Jessica (x6506).

• **DO: Help your investigators:**
  – Take the time to help them understand how to review and certify their effort reports.

• **DON’T: Consider this just another administrative burden.**
• **DON’T: Share your password or log in as someone else to approve or certify a report.**
New process for resetting FastLane/Research.gov passwords

- On Monday, August 1st, NSF implemented a more convenient and secure process for resetting NSF passwords.

- NSF awardees and proposers will no longer be able to reach out to Sponsored Programs Offices to reset their passwords on both FastLane and Research.gov; instead, they can reset their own password.
Use the Assignment Request Form in FORMS-D to Provide NIH Peer Review Referral Information

NIH applicants have the opportunity to suggest information to help NIH refer and review their grant application.

When applying with the new FORMS-D application package, applicants will include their requests in the new assignment request form, rather than in the cover letter has been done in the past.
Applicants should use the new assignment request form if they choose to:

- Request assignment to an institute/center for funding consideration

- Request assignment to a particular study section for initial peer review

- Identify individuals they do not think should review their application

- Identify scientific areas of expertise needed to review their application
Submitting My Application in Response to a Parent Announcement: Can any NIH Institute or Center Fund It?

Not necessarily! Your proposed research needs to fall within the mission of NIH and the mission of at least one participating office, institute, or center listed on the funding opportunity announcement to which you are applying. While our broad "parent announcements" do allow NIH to accept applications on a broad range of research topics, not all NIH institutes participate on all parent announcements.

If your proposed research does not fall under the mission of a participating office, institute, or center, then we cannot assign your application for peer review or funding consideration. Remember: check for fit, before you submit.
NIH: Rigor and reproducibility changes, visualized.

The link below provides guidance on NIH’s goals of Rigor and Reproducibility in Grant Applications

http://grants.nih.gov/reproducibility/index.htm
Can a PI Check Whether They are Eligible for Continuous Submission?

Principal investigators with an Internet Assisted Review (IAR) role — i.e. current and former reviewers and advisory committee members — can check if they are eligible for continuous submission of their grant applications by going to their Personal Profile in eRA Commons and looking at the Reviewer Information section (see instructions).
Change of Eligibility Period in the NIH Continuous Submission Policy for Reviewers with Recent Substantial Service

(NOT-OD-16-121) National Institutes of Health
Eligibility continued ....

• This Notice announces the lengthening of the window of time during which peer reviewers who have served six times in eighteen months ("Recent Substantial Service" as defined in NOT-OD-09-155) can submit their applications under the NIH Continuous Submission Policy: Eligibility now begins on August 1 following the eighteen month service window and continues through September 30 of the next year.
Continue Using Current Forms Until Further Notice

- For now, keep using the forms NIH posts with our funding opportunity announcements (ignoring any old expiration dates on the forms). After we get the updated federal-wide forms from Grants.gov, we’ll let you know if there is anything you need to do differently.
NIH Loan Repayment Programs (LRPs)

- The LRP 2016 application cycle opens on **September 1, 2016** and closes on **November 15, 2016**
- **NIH eRA Commons ID Required** - All applicants (new and renewal) are required to have an NIH eRA Commons ID to submit an application. Check with your grants administrator and visit the eRA Commons website
- **One Application Submission Deadline** – The submission deadline for applications, references and other institutional support documentation is **November 15th**.
- **New Online Application** – A newly revised online application will be available September 2016.
New Policy Eliminates Most Appendix Material for NIH/AHRQ/NIOSH Applications

• Submitted for Due Dates On or After January 25, 2017
  (NOT-OD-16-129)
In a software release scheduled for Thursday, August 18, 2016, several new features will be added to xTRACT. xTRACT is the Extramural Trainee Reporting And Career Tracking system and is accessed via eRA Commons. It allows applicants, grantees and assistants to create research training tables for progress reports and institutional training grant applications.

Features

- **Publication citations may now be searched and imported from Pubmed.**
  When entering publications for a participating trainee, xTRACT now provides users with the ability to search Pubmed using either the Pubmed identifier, the author name, or publication title. The ability to enter a full citation manually (instead of searching Pubmed) is still available as well, for any occasion where the user may require it.

- **Access for delegated assistants (users with ASST role) is expanded.**
  Assistants may now perform the following on behalf of their PIs:
  - Initiate the Research Training Dataset (RTD) for New Applications
  - Finalize an RTD
  - Unfinalize an RTD
NIH now has a “Contacting Staff at the NIH Institutes and Centers” page

Our “Contacting Staff at the NIH Institutes and Centers” page explains the roles of NIH staff, and, most importantly, where you can find the name and contact information for NIH staff members who should be best able to help you.