

**NCURA Region II**  
Hot Topics in Research Administration

---

---

---

---

---

---

---

---

**Presenters**

---

**Denise Clark**  
Associate Vice-President for Research, University of Maryland  
College Park

**Ann Holmes**  
Assistant Dean of Finance & Administration, College of Behavioral  
& Social Sciences, University of Maryland, College Park

2

---

---

---

---

---

---

---

---

**Hail to the Chief...**

---

**President Obama tries to use scientific jargon with little success**



[http://www.washingtonpost.com/posttv/politics/president-obama-tries-to-use-scientific-jargon-with-little-success/2014/12/02/d64db158-7a7b-11e4-8241-8cc0a3670239\\_video.html](http://www.washingtonpost.com/posttv/politics/president-obama-tries-to-use-scientific-jargon-with-little-success/2014/12/02/d64db158-7a7b-11e4-8241-8cc0a3670239_video.html)

3

---

---

---

---

---

---

---

---

**Recent Articles**

*Keeping the Lights On*

Nature Magazine Nov 20, 2014

*How a \$47 Shrimp Treadmill Became a \$3-Million Political Plaything*

The Chronicle of Education, Nov 13, 2014

*Next Battle in the war on science*

Politico, Nov 27, 2014

*Boehner: Brace Yourself for Another Government Shutdown*

Government Executive, June 5, 2015

*Congrats Young Scientist*

Rahaf Online, March 4, 2015

Handouts p. 3-18

4

---

---

---

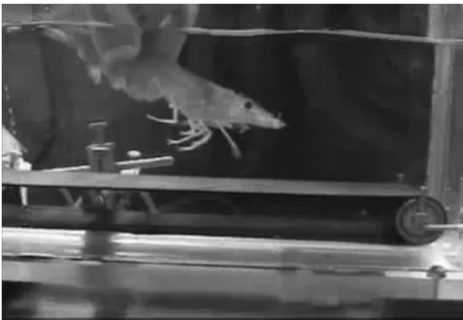
---

---

---

---

---



5

---

---

---

---

---

---

---

---

**What Makes a Topic Hot?**

- OIG Audit Plans released
- Investigations of research by government or press
- Audit findings at other institutions
- Allocations of wide-spread non-compliance
- New regulations or changes to existing law

6

---

---

---

---

---

---

---

---

### O.I.G. Audit Plans

Office of Inspector General publishes its plan annually to describe the focus of its audits in the coming year.

- Each federal agency has its own OIG Audit Office
  - e.g., NIH Office of Inspector General <http://oig.hhs.gov>

Handouts p. 20

7

---

---

---

---

---

---

---

---

### Highlights of HHS OIG Audit Plan

- Compliance with Cost Principals
- Grants Policy Implementation
- Review of OMB A-133 Audits
- Information Security
- Detailed Work Plan:

<http://oig.hhs.gov/reports-and-publications/archives/workplan/2015/FY15-Work-Plan.pdf>

Handouts p. 20

8

---

---

---

---

---

---

---

---

### HHS OIG Semiannual Report to Congress

- Payroll Certification System Pilot
- Reviewed UC Irvine pilot program that may have change the effort reporting process
  - Small Business Programs under review
  - OIG Auditors are looking at the A-133 audits for quality
    - About 10% of A-133 audits are in question!

Handouts p. 24

9

---

---

---

---

---

---

---

---

**Highlights of the NSF Audit Plan**

- ARRA Awards completed by 9/30/13
- Lessons Learned from Government Shut Down
- Audits of Costs Charged to NSF Awards
- Review of A-133 Audits

Detailed Work Plan:  
<http://www.nsf.gov/oig/2015auditplan.pdf>

Handouts p. 28

10

---

---

---

---

---

---

---

---

**NSF OIG Semiannual Report to Congress**

Major emphasis on 2/9ths salary rule

Expenses for equipment at the end of awards were questioned

Review of A-133 reports finds that 43% were late or inaccurate!

Civil and Criminal Investigations continue to amaze us!

Handouts p. 42

11

---

---

---

---

---

---

---

---

**Other Recent Changes  
In Regulations**

**SEE HANDOUTS BEGINNING ON PAGE 61**

---

---

---

---

---

---

---

---

**DATA Act**

---

Digital Accountability and Transparency Act of 2014 (Public Law 113-101)

- Goal is to make the details of Federal spending more transparent to the public
- OMB and Treasury have one year to define common data elements for financial reporting
- Contractors have 2 years to start using the data elements

<https://www.youtube.com/watch?v=Bnn3lsOhuIE>

Handouts p. 61 13

---

---

---

---

---

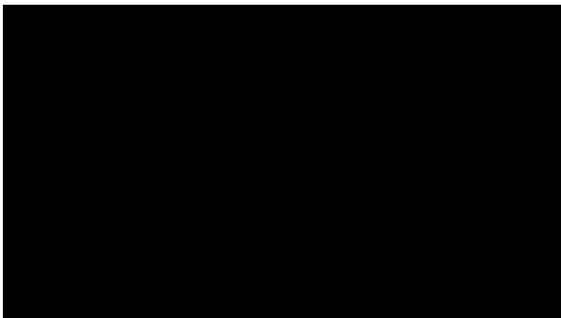
---

---

---

**DATA Act**

---



14

---

---

---

---

---

---

---

---

**NIH Reminder on Application Compliance NOT-OD-15-095**

---

Reminder that non-compliance can have serious consequences and NIH may withdraw any application that is not compliant with the instructions in the Application Guide, Funding Opportunity Announcement, and NIH Guide Notices.

Handouts p. 63 15

---

---

---

---

---

---

---

---

### Additional NOTs of Interest

**NOT-OD-15-039: Simplifying the NIH Policy for Late Application Submission**

- Two weeks
- A cover letter explaining the reasons for the delay must be included with the application.

**NOT-OD-15-108: Delays in Grant Application Submission due to weather/natural disasters/emergencies**

- Applications submitted ASAP after applicant institution re-opens, not to exceed number of days applicant institution was closed

**NOT-OD-15-032: New Biographical Sketch format**

- New section: Contribution to Science

**NOT-OD-15-098, NOT-OD-15-099: ASSIST now an option for R01, K, U01 proposals**

**NOT-OD-15-048: NRSA Stipends, Tuition/Fees and Other Budgetary Levels Effective for FY15**

- 2% increase in stipend levels

Handouts starting p. 64

16

---

---

---

---

---

---

---

---

---

---

### Revised Timeline for Administrative Changes to NIH Domestic Awards to Transition to Payment Management System Subaccounts - NOT-OD-14-103 (reminder in NOT-OD-15-105)

The change to the method of making payments is being changed from a line-of-credit pool to account-by-account (subaccount) draws to enhance financial data integrity.

Notices will now have PMS Account Type

An "s" after the award type number = subaccount

**Revised Timeline:**

The transition of all NIH awards to PMS subaccounts is anticipated to be complete by September 30, 2016.

Transition to subaccounts will occur between 10/1/2015 and 9/30/16.

Carryover (unobligated) balances will be reported and then re-obligated to the new subaccount in PMS. The funds can be drawn if the award has automatic carryover authority

- All new awards will be subaccounts (P) with award types that contain the "s"
- NIH will be reviewing funds with 25% unobligated

FAQ: <http://grants.nih.gov/grants/payment/faqs.htm>

Handouts p. 76

17

---

---

---

---

---

---

---

---

---

---

### NSF Updates

- New PAPPG
  - References to UG
  - Administrative and clerical costs
  - Domestic and foreign travel must be justified
  - Participant support will be "closely scrutinized"
  - Materials and supplies (i.e., computing devices)
  - Justification 3-page limit
  - Updated policy on food and drinks for intramural meetings
  - "Proposal Not accepted or Returned without Review" – may vs will

Handouts p. 79

18

---

---

---

---

---

---

---

---

---

---







**Quote from 2013 audit guide**

Data analytics is useful in identifying risk at all stages of awards.

For example,

At the preaward stage:

- Risks would include inflated budgets and conflicts of interest among proposal reviewers.

At the active award stage:

- Risks would include unusual burn rates (e.g., expenditures for equipment at the end of an award), excess cash on hand, and no, late, or inadequate project reports.

Red flags at the end of an award include multiple post-closeout financial adjustments.

25

---

---

---

---

---

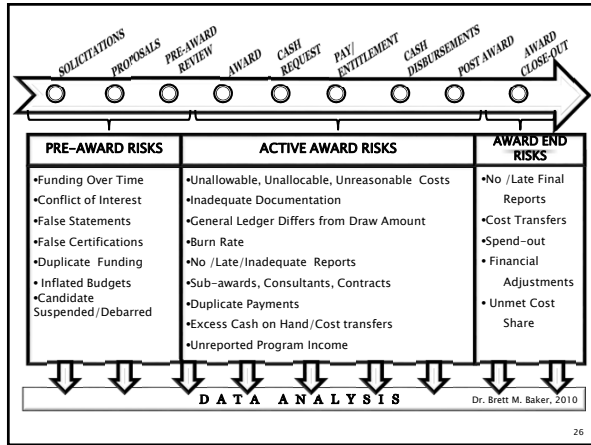
---

---

---

---

---




---

---

---

---

---

---

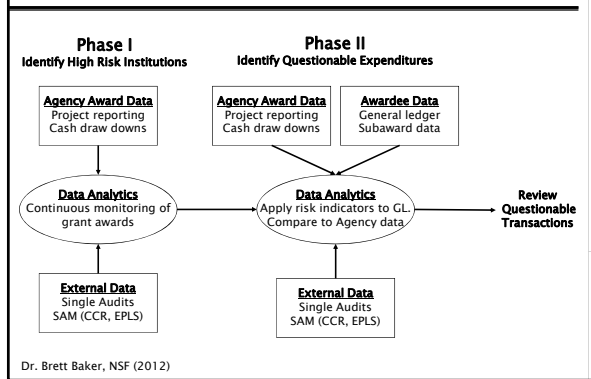
---

---

---

---

**Risk Assessment and Identification of Questionable Transactions**




---

---

---

---

---

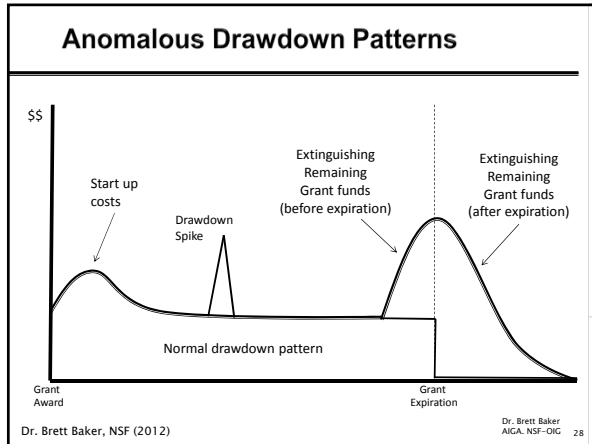
---

---

---

---

---




---

---

---

---

---

---

---

---

---

---

---

---

### Example: Equipment Charges Incurred Immediately Before Grant Expiration Date

GRANT ID	OBJECT DESCRIPTION	GRANT EXPIRATION DATE	TRANSACTION DATE	LEDGER POST DATE	FINANCIAL AMOUNT
XXXX42	CONSTRUCTION AND ACQUISITION	09/30/2009	09/30/2009	10/06/2009	51,851.22
<b>Same day as expiration</b>					
XXXX27	INVENTORIAL EQUIPMENT	07/31/2010	06/04/2010	08/11/2010	31,621.56
<b>57 days before expiration</b>					
XXXX77	INVENTORIAL EQUIPMENT	08/31/2009	07/16/2009	09/10/2009	23,163.75
<b>46 days before expiration</b>					
TOTAL					106,636.53

Dr. Brett Baker, NSF (2012) 29

---

---

---

---

---

---

---

---

---

---

---

---

### Travel Related to Award?

NSF_OIG_Transaction	Expiration Date	Transaction Date	Expense Type	Amount
GL Trans-030745	09/25/2007	08/31/2007	TRAVEL-IN-STATE	73,519
GL Trans-099671	06/11/2010	06/01/2010	TRAVEL - FOREIGN	41,474
GL Trans-084844	11/02/2010	10/31/2010	TRAVEL - OUT-OF-STATE	37,516
GL Trans-045792	02/09/2010	02/01/2010	TRAVEL-IN-STATE	28,905
GL Trans-117607	06/11/2010	07/15/2010	TRAVEL - FOREIGN	27,262
GL Trans-126299	08/19/2010	09/30/2010	TRAVEL-IN-STATE	20,975

Dr. Brett Baker, NSF (2012) 30

---

---

---

---

---

---

---

---

---

---

---

---

## What Audits Are Telling Us



---

---

---

---

---

---

---

---

### UCSB NSF Audit

Data Analytics were used throughout the audit to determine problem areas and identify questionable costs

- A-133 Audit report triggered the audit

#### NSF OIG identified \$6,325,483 in questioned costs

- \$1.9 million in overcharged summer salaries (9-month calculation)
- \$2.8 million in unsupported cost-sharing
- \$500K in inappropriate cost transfers
- \$473K in F&A overcharges
- \$440K in unallowable costs
- \$180K in unallowable fellowship costs

NSF Audit Resolution settles for \$43,551

Handouts starting p. 110 32

---

---

---

---

---

---

---

---

### Audit Resolution

#### NSF Sustains \$43,551 of \$6.3 million of Questioned Costs at the University of California, Santa Barbara

The OIG stated the following in regard to the other costs:

We escalated recommendations pertaining to \$2.2 million in cost sharing claimed for which UCSB did not have supporting documentation, \$1.9 million of overcharged summer salaries, and more than \$136,000 of equipment purchased toward the end of a grant. NSF has informed us that it does not intend to sustain any additional costs from the audit stating that the university's treatment of summer salaries complies with its policy and that UCSB maintained adequate supporting documentation for cost share. With respect to equipment purchases, NSF stated that such purchases appeared to be reasonably allocated to NSF grants.

**OIG disagrees with NSF's decision to allow \$6 million of costs questioned in the audit.**

Source: OIG Report to Congress 9/2014  
Handouts p. 131 33

---

---

---

---

---

---

---

---

**University of Wisconsin Madison NSF Audit**

Audit done using Data Analytics

Auditors questions \$1.2 Million in personnel salary over the 2-month limit

Leave accrual and charges to NSF awards questioned

Expenses at the end of the award and after the period of performance questioned

Travel expenses paid for personnel not paid from the award was questioned

Handouts p. 132

34

---

---

---

---

---

---

---

---

**UCSD HHS Audit**

Audit was done using random sample methodology

17 transactions found to be unallowable – resulting in a \$202,401 request for settlement (Extrapolation!)

Hourly timesheet not approved

Purchasing equipment at the end of the award

Office supplies!

Handouts p. 161

35

---

---

---

---

---

---

---

---

**Investigation of Columbia University**

Columbia failed to use a “suitable means of verifying whether the salary and benefits charged .... were based on employee’s actual effort on the grant”.

This failure resulted in “mischarges” to federal awards.

Columbia paid over \$9 million to resolve the claims.

Handouts p. 176

36

---

---

---

---

---

---

---

---



### Human Subjects Research

**RESEARCH:**

A systematic investigation—research development, testing and evaluation—designed to develop or contribute to **generalizable knowledge**.

What is generalizable knowledge?

- Examples: publication, posters, presentation at meetings, etc.

---

---

---

---

---

---

---

---

### What makes a good ad for human subjects?

Answers who, what, when, where, and how

- Who – eligibility criteria
- What – description of what research is
- When – gives duration of project
- Where – logistics

Ad is the first step in informed consent

- Should be vetted by IRB committee

---

---

---

---

---

---

---

---

### Online study of young children's daily emotions and behaviors

Are you a parent of a child between the ages of 3 and 5 years old?

Researchers at UMD are investigating a number of phenomena related to children's emotional and behavioral development from early childhood through adulthood.

Participants will be asked to complete online surveys each evening for 14 days.

Parent must be the primary caregiver and read and speak English. Children must not have major medical or developmental disabilities. One child per family can participate.



Compensation: \$50 Amazon.com gift card

Research possible through Federal award.

---

---

---

---

---

---

---

---

**What questions do you ask?**

Does it have IRB approval?  
Federally funded?  
Compensation?  
Incentive?



---

---

---

---

---

---

---

---

**It doesn't have IRB approval!**

Now what? People tested & payments made

- Compliance calls Chair
- Compliance assesses risk
  - Yes, risk. Calls VPR – **performs IRB audit**
- Researcher can't use data
  - Scientific misconduct
- JV expenses
  - To where?

---

---

---

---

---

---

---

---

**Post Approval Monitoring – Approved Protocols**

**Internal Risk Assessment**

- What if no consent form found?
  - Can request consent after the fact
    - if no consent given, must remove data
- Subject numbers exceed number approved in protocol
- Compensation/Incentive payments greater than approved
- Handling of cash and other payment methods
- Grant congruency

---

---

---

---

---

---

---

---

**Contact Information**

**Denise Clark**

[djclark@umd.edu](mailto:djclark@umd.edu)

**Ann Holmes**

[amholmes@umd.edu](mailto:amholmes@umd.edu)



46

---

---

---

---

---

---

---

---