Research Financial & Administrative Series Training
(RFAST)
Welcome

This training series is provided by the Office of Research and Graduate Studies. The objectives are to:

- Ensure that researchers are aware of regulations and USU’s related policies and procedures, and
- Provide information researchers need to achieve compliance
A recent audit of a university that has a profile similar to USU's resulted in a disallowance of more than $6 million. One of the reasons given included a finding that the institution could not show that their investigators had been properly trained on research-related regulations, policies and procedures.
Why this training and why now?

RFAST is designed to provide information that will help you understand University policies and procedures, and will point you to resources that will help you to know and do what is required and expected.
The USU compliance program

Four basic strategies to help us achieve compliant and ethical operations:

- Internal control systems
- Required training
- Monitoring
- Enforcement of regulatory requirements
What is included in this course?

The modules provided in this course are organized according to key topics related to research administration:

- Proposal preparation, processing and review
- The award process and project initiation
- Key research compliance issues
- Managing sponsored project resources
The Division of Sponsored Projects (DSP, formerly referred to as SPO) has developed tools to assist researchers as they develop budgets, including a budget template and budgeting guidelines. Sponsored Programs assists investigators by reviewing budgets and negotiating and accepting awards to ensure compliance with regulations and policies.
USU’s F&A rates

The Federal government reimburses to USU its share of costs that cannot be directly attributed to a project (indirect costs) based on a negotiated rate for Facilities & Administrative (F&A) costs. At USU these rates are negotiated with the Office of Naval Research, based on costs that have already been paid by the university and forecasts of future costs.
USU’s F&A rates

- Our fully negotiated F&A rate is applied to the Modified Total Direct Costs (MTDC) for any given project, unless the granting agency restricts F&A reimbursements.

- USU’s objective is to charge the correct F&A rate against the correct MTDC in order to ensure it receives the amount of funding required to adequately support the project.
Cost Sharing Principles

- Cost sharing is funding committed from university resources toward a sponsored project.
  - Committed
  - Voluntary Committed
  - Voluntary Uncommitted

- Follows same federal guidelines of allowability as direct costs
Agreement Types

Grants:

- Fund research aimed at expanding the body of knowledge
- Do not require specific deliverables
- Are governed by agency-specific terms and conditions
Agreement Types

Contracts:

- Fund research aimed at delivering specific technologies or data
- Usually require tangible deliverables
- If sponsored by a federal agency, are governed by Federal Acquisition Regulations (FARs).
- If sponsored by non-governmental entities, are governed by terms and conditions approved by both parties.
Agreement Types

Cooperative Agreements:

- Allow institutions to work together with agency personnel
- Are governed by agency-specific terms and conditions
Compliance Reviews

Compliance requirements for sponsored agreements cover financial, operational and ethical issues.

- Sponsored Programs and Sponsored Programs Accounting (SPA) personnel are content experts with regard to identifying and raising awareness of financial requirements that could be problematic for USU.

- Common operational issues that arise include publication restrictions or export control requirements being incorrectly applied to USU.
Sponsored Programs has the lead role in negotiations. Its objectives are:

- To provide researchers with the best terms and conditions available to complete the project within an appropriate budget.
- To help manage USU’s operational and compliance risks by making the interactions with the sponsor predictable and reasonable.
Setting up Accounts

To successfully set up accounts for a project at USU, the following are necessary:

- A project proposal that has been signed by the authorized signatory and submitted as required by regulation
- An SP-01 that has been approved at all required levels
  - These two are done at the proposal stage
Setting up Accounts

- A Notice of Award and an executed award document from the sponsor OR a letter of guarantee for pre-award expenses from the PI, department or college
- If matching funds are approved, documentation of a source for the funds, and if included, an executed waiver of F&A costs
- Notification that all issues checked on the SP-01 have been addressed and approved.
Conflicts of Interest arise when an individual has a primary interest (associated with his/her employment at USU) and a secondary interest (outside the institution).

- These interests are never completely aligned, so under federal regulations and USU policy, all investigators must disclose their significant outside interests and manage those that are judged to be conflicts of interest related to USU research.
Ethics Reviews

Sponsored Programs also serves as the gatekeeper for ethics-related compliance issues through the SP-01.

- Ultimate responsibility for carrying out research of any kind rests with the researchers and their staff. USU researchers are encouraged to stay at the forefront of their disciplines and provide adequate training to research staff to ensure the safe and efficient conduct of research. The IRB, IACUC and IBC are resources available to assist USU researchers in achieving this goal.
Ethics Reviews

The Institutional Review Board (IRB)
- oversees Human Subjects Research.

The Institutional Animal Care and Use Committee (IACUC)
- oversees use of animals in research and teaching.

The Institutional Biosafety Committee (IBC)
- oversees research involving Recombinant DNA and Synthetic Biology.
Training

- Conduct of both human subjects research and animal research require training prior to beginning the work.

Submitting Proposals

- Protocols for human subject and animal research are reviewed by the IRB and IACUC, respectively. Both types of protocols are submitted through a web-based application system called Protis.
Ethics Reviews

Continuing Review

➢ Funding agencies expect that USU will carry out continuing reviews in accordance with regulations. Human Research Studies and DNA registrations usually require annual review, while most animal protocols require review once every three years.
Financial Accountability

By far the majority of external funding USU receives for research studies is dedicated to support of personnel, so it is not surprising that the agencies are interested in monitoring and controlling sponsored programs costs associated with salaries, wages and benefits.
Time and Effort Reporting

In a nutshell, the system of effort reporting captures the effort expended on projects being conducted for the sponsor as a percentage of the overall effort spent by the individual in completing his/her work assignment.
Time and Effort Reporting

The take-away points are:

- No matter how many activities are added, effort to be reported is always 100%, and
- Every time a new project comes into the university, it will affect the plans of the individuals that will be expending effort on it. These changes need to be reflected in USU’s payroll system.

Several reports are provided to help keep track of salaries and personnel.
Recovering Pre-award Costs

Universities are allowed under federal guidelines to approve expenditures on projects up to 90 days prior to the advertised award start date when agreed to by the agency.

- For government sponsors, a Letter of Guarantee Form is submitted.
- For industry sponsors, a Guarantee of Expenditures Form is submitted.
USU has been audited in the past because a number of projects that were beyond their end dates were still shown as open. The most common reasons that led to late closeouts were delinquent final technical reports and lack of communication between the PI and the units that implement the closeout – the Division of Sponsored Programs and Sponsored Program Accounting.
Project Closeout

Why it’s important:

- Timely and efficient work improves our relationships with sponsors.

- Closeouts are required by federal agencies within 90 days of the end date of the project. Late submissions result in delayed (or possibly even disallowed) payments and extra work (such as cost transfers, compliance reviews, etc.)

- Noncompliance negatively impacts the university’s single audit (required under OMB Circular A-133), and increases audit risks both internally and with sponsors.