RESEARCH ADMINISTRATION UPDATES AND ITEMS OF INTEREST

OCTOBER 2011

OFFICE OF THE VICE PRESIDENT OF RESEARCH / OFFICE OF SPONSORED PROJECTS

This newsletter is produced by the Office of Sponsored Projects to provide agency updates, sponsor policy and procedural information, and guidance and training in all aspects of sponsored project administration for Researchers and Research Administrators. Please visit http://www.research.brown.edu/rschadmin/OSP_Newsletter.php for archives.

Office of Sponsored Projects / 401-863-2777 / www.research.brown.edu

OSP / OVPR UPDATES

➢ **New Salary Cap / NIH Salary Cap Policy and Procedures Implemented October 1st**

In order to comply with sponsor salary cap requirements, NIH Salary Cap Policies and Procedures have been created. The Policy provides guidance on the following topics:

- Preparing an NIH proposal budget for an individual whose Institutional Base Salary is above the NIH Salary Cap
- Completing the NIH Salary Cap worksheet
- Completing required documents for the Award stage

To review the policy, procedures, and FAQs on NIH Salary Cap:

- NIH Salary Cap Policy & Procedures
- NIH Salary Cap FAQs

➢ **New Cost Sharing Policy and Procedures Implemented October 1st**

The policy provides guidance on the following topics:

- The contractual, financial, and administrative implications that result from a commitment to cost share
- Various Types of Cost Sharing
- Allowable sources of funds for Cost Sharing
- Completing the Cost Sharing Commitment Form
- Required Cost Sharing Approvals
- PI and Departmental Roles and Responsibilities

To review the policy, procedures, and FAQs on Cost Sharing on Sponsored Projects:

- Cost Sharing on Sponsored Projects Policy & Procedures
- Cost Sharing FAQs

➢ **Export Controls at Brown University**

Three exclusions from US export control regulations are very important to Brown:

- The Instruction Exclusion for materials and information commonly taught in science and engineering classes at a US college or university
- The Public Domain Exclusion for materials and information already published and generally available at a library or newsstand
- The Fundamental Research Exclusion which applies to basic or fundamental research at a college or university that has no restriction on publication or access by foreign nationals.

Teaching and Research generally fall into one of these three categories of exclusion.

However, export control regulations and laws may still impact University employees in a few areas:

- Proprietary or Confidential information received from industry is protected by the US export control laws and must not be shared with non-US Persons
- Individuals traveling internationally with personal devices (e.g., cell phones, laptop computers, etc) or with tools of the trade required for University business
- In a few limited cases, specific items of equipment on campus may be restricted by export control laws

University assistance with export controls is available at:
http://www.research.brown.edu/rschadmin/international_research_administration-export_controls.php or

Norm Hebert, Director of International Research Administration, can provide assistance with export controls and may be reached at 401-863-6791, or by email, at Norman_Hebert@brown.edu .

AGENCY UPDATES

NIH UPDATES

➢ **eRA Commons Issue with "Additions for Review" Link**

Since eRA Common's recent upgrade in early October, the **Additions for Review** Link located under the Other Relevant Documents section on the Status Information Screen is not working. When clicking that link, users will see a message - "page cannot be displayed." The NIH Help Desk plans to have this issue resolved within the next couple of weeks and has asked the community to disregard the Additions for Review documents at this time.

➢ **Issuance of the Final Rule - Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors**

NOT-OD-11-109

The U.S. Department of Health and Human Services (HHS) has issued a final rule in the Federal Register that amends the Public Health Service (PHS) regulations on Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought and Responsible Prospective Contractors. An Institution applying for or receiving NIH funding from a grant or cooperative agreement must be in compliance with all of the revised regulatory requirements no later than 365 days after publication of the regulation in the Federal Register, i.e., August 24, 2012.

Major Areas Addressed in the Revised Regulations:
- Updated definition of Significant Financial Interest (SFI)
- Extent of Investigator Disclosure
- Information reported to PHS Awarding Component
- Information made accessible to the public
- Provide Investigator Training

To view the Summary of Major Changes between the 1995 regulation and the 2011 regulation, visit http://grants.nih.gov/grants/policy/coi/summary_of_major_changes.doc.

To view the frequently asked questions regarding the implementation of the revised regulations for grants and cooperative agreements please visit the Frequently Asked Questions Section (http://grants.nih.gov/grants/policy/coi/coi_faqs.htm).

➤ **Revised Policy: Managing Conflict of Interest in the Initial Peer Review of NIH Grant and Cooperative Agreement Applications**

NOT-OD-11-120

NIH has issued a revised policy for managing conflict of interest (COI), the appearance of COI, prejudice, bias, or predisposition in the **NIH initial peer review process**. The revised policy is intended to facilitate reviews that involve multi-site or multi-component projects, consortia, networks, aggregate datasets, and/or multi-authored publications.

The revised policy applies to:

- The management of COI, appearance of COI, prejudice, boas, or predisposition in the NIH initial peer review process on the part of individuals who are not Federal employees participating as reviewers; and
- The selection and use of Federal employees to participate as reviewers, in the initial peer review of:
  - All applications submitted to NIH for competing research projects grants and competing revision; program projects; resources; instrumentation; center grants; cooperative agreements; institutional and individual NRSAs; and academic, clinical investigator, and career development grants.
  - Such applications submitted for the September 25, 2011 due date and thereafter.

Please see the notice (**NOT-OD-11-120**) for details regarding the following:
- Definitions
- General Policy
  - Responsibilities for managing COI or appearance of COI
  - Managing COI or appearance of COI
  - Requests for Deviations
- References

➤ **Revised Multiple Program Director(s)/Principal Investigator(s) Policy to Allow Change with Prior Approval**

NOT-OD-11-118

NIH amended the NIH Multiple PDs/PIs policy to allow post award changes from or to a multiple-PD/PI award with the prior approval of the Grants Management Office (GMO). A request to change an active award from a single-PD/PI to a multiple-PD/PI model or vice versa must be made by the grantee organization and should be based on the scientific needs of the project. *Justifications based on administrative convenience will not be considered*. If the proposed changes are not acceptable to the NIH awarding IC the grant may be suspended or terminated. Please see the NOT-OD-11-118 for details regarding the procedures for requesting a change from an active single-PD/PI to a multiple-PD/PI award and a change from an active multiple-PD/PI to a single-PD/PI.

➤ **Clarification of Instructions for the Review of Renewal applications for Ruth L. Kirschstein National research Service award (NRSA) Institutional Research Training Grants (Parent T32 and T35)**

NOT-OD-11-110

NIH has clarified the instructions for the review of the above mentioned applications. The following are the modified instructions under the **Additional Review Criteria – Renewals Section** of the Parent T32 and T35 Funding Opportunity Announcements:

For Renewals, the committee also will consider the progress made in the last funding period, **including on the Recruitment and Retention Plan to Enhance Diversity.**

Specifically they will look for:
- *"Does the application describe the program's accomplishments over the past funding period(s)?"*
- *"Are changes proposed that would improve or strengthen the training experience?"*
- **Additional criterion for T35 only**: *"What is the success in attracting trainees back for multiple appointments?"*

DHHS UPDATE	➢ **Extension for Comments on Proposed Human Subject Regulations** The Office of the Secretary of the Department of Health and Human Services (HHS) in coordination with the Office of Science and Technology Policy (OSTP) is extending the comment period for an advance notice of proposed rulemaking (ANPRM) requesting comment on how current regulations for protecting human subjects who participate in research might be modernized and revised to be more effective. **Comments can be submitted through October 26, 2011.** Please see the Federal Register (http://www.gpo.gov/fdsys/pkg/FR-2011-09-01/html/2011-22341.htm) notice for information on how and where to submit comments.

AGENCY TIP – *Receiving a Rejection message from Grantsg.gov is a disconcerting experience. The most common reasons applicants receive the "Rejected with Errors" message from Grants.gov are:*

✦ The Closing Date of the grant opportunity for which you have applied has already passed and the grantor agency is no longer accepting applications.

✦ This application contains an attachment(s) with a filename that does not meet Grants.gov requirements. To ensure that your application package will be successfully submitted to the grantor agency please adhere to the following guidelines:

- ○ *Avoid using special characters (example: &,-,*,%,/,#) in attachment file names, including periods (.).*
- ○ *Avoid attaching documents with the same file name (especially subaward budget justifications) and limit the file name to 50 characters or less*

These Error messages are within your control and are not considered "System Issues" that would allow for correction after the deadline. So please remember to read the FOA, follow the guidelines, and submit your applications early!

COEUS UPDATES

COEUS NEWS	COEUS TIP OF THE MONTH

NEW PHS398 Modular Budget Form V1-2 Now Available!

NIH, AHRQ, CDC, FDA and NIOSH are in the process of phasing out the ADOBE-FORMS-B1 Grants.gov forms and replacing them with ADOBE-FORMS-B2 Grants.gov Forms.

The PHS398 Modular Budget Form V1-2 is now available in Coeus; applicants should use the most recent FOAs with ADOBE-FORMS-B2 packages when connecting to Grants.gov.

Departments Can Use Coeus Lite for Proposal Development

Coeus Lite, the Web interface of Coeus Premium, is available to Departments for proposal development. The Coeus Lite interface contains the majority of proposal development functions needed to create and develop your proposal records, however, there are still some functions that are exclusive to Coeus Premium and will need to be completed in that environment.

Please visit:
http://www.research.brown.edu/osp/coeus/PD_Documents/Coeus Premium_vs_CoeusLite.pdf to view the functions that are specific to Coeus Premium.

For individuals who wish to learn more about how to use Coeus Lite, OSP offers two trainings: One for new users to Coeus and one for current Coeus Premium users who would like to transition to using Coeus Lite. Click the on links below to register for one of the training sessions.

- CoeusLite – Proposal Development (New Users)
- CoeusLite – Transitioning from Coeus Premium to CoeusLite

Coeus User Group Meeting

***NEW* - The Coeus User Group is changing the monthly meeting to every other month**. The meeting is intended to allow Coeus Users to network, share best practices, learn new business process changes, and address Coeus issues.

If you have ideas for topics to discuss please email Kat Szulc.

Next Meeting:
November 16th – Salomon Center Room 003
10:00am – 11:30am

UPLOADING SUBAWARD BUDGETS IN COEUS

If your proposal is a Grants.gov submission and your proposal includes subawardees, you need to upload the subaward budgets in the Budget Section of Coeus.

For Standard FOAs (R01, R21, etc.) the subcontract budgets are entered on the Adobe Subaward **RR Budget A30-V1.1 Form**. A downloadable version of the RR Budget A30-V1.1 Form is also available on the Coeus Web site at http://research.brown.edu/osp/coeus/PD_Documents/RR_Budget_A30-V1.1.pdf

***Note** – Less common FOAs may require the subcontract budget on another type of RR Budget Form. Please read the announcement and extract the correct budget form version from the opportunity announcement in Grants.gov.*

To Complete the Adobe Subaward RR Budget Attachment Form:
Complete the form in accordance with the FOA.

Tips:
- Each subaward requires:
  - A completed **RR Budget Form** and attached **Budget Justification** on that form.

- The attached **Budget Justification File** for each subaward requires a unique file name and must adhere to these guidelines:
  - *Avoid using special characters (example: &,-,*,%,/,#) in attachment file names, including periods (.).*
  - *Avoid attaching documents with the same file name.*
  - *Limit the file name to 50 characters or less.*

- Make sure that the Role of the Subaward PI on the Budget Form matches their Role on the RR Senior/Key Person expanded Form.

- Make sure that the effort for individuals included in the budget is greater than 0.

- Avoid unnecessary spaces in any of the fields on the RR Budget Form.

- Do not start the next project period without completing all the required information. If you click the [Next Period] button in error after the final project period, you will need to delete the "extra" budget period. To do so, click the [Delete Entry] button for that last period.

To upload the Subaward File in Coeus:

- Follow instructions in the Coeus Premium Guide starting on page 157 - http://www.research.brown.edu/osp/coeus/PD_Documents/Complete_Proposal_Development_Guide_2011.pdf

TRAINING

OSP TRAINING SPOTLIGHT	ABOUT OSP TRAINING

OSP TRAINING SPOTLIGHT

**Post Award
Financial Closeout of
Sponsored Projects**

This workshop will offer an in-depth review of the financial closeout process for sponsored programs. Specific areas of focus will be; understanding the elements of the rough draft financial package, how to correctly provide adjustments to reported expenditures, and the underlying assumptions behind the post audit review of expenses. This training will culminate with a hands-on exercise that will work through the closeout process for an award.

Topics covered in this class:
- Financial Closeout Overview
- Financial Closeout Roles and Responsibilities
- Key Terms and Considerations
- Post Audit Review

Feedback from participants who have taken the class:

- *"It was helpful that trainer covered the entire range of closeout, taking into consideration that trainees had differing levels of involvement, and experience with 5 ledger accounts."*

- *"The Case Study was helpful"*

- *"The session was very informational and the instructor taught it at a steady pace giving relevant and useful examples."*

Click HERE to register for *Post Award – Financial Closeout of Sponsored Projects*

ABOUT OSP TRAINING

As part of our effort to keep the campus community informed on issues related to research administration, the Office of Sponsored Projects is pleased to offer numerous training opportunities for faculty and staff that range from how to use Coeus to guidelines on award management:

Coeus Training

Learn how to use the University's sponsored project management system, Coeus. Classes include creating proposals, budgets, submitting Grants.gov proposals, and viewing proposal and award records.
http://training.brown.edu/index.php?campaign=71

Post Award Training

Learn best practices in Post Award management. Sessions covering travel, commitments, administrative costs, and other areas of post award administration are offered.
http://training.brown.edu/index.php?campaign=72

Click HERE to view all Sponsored Projects training sessions on Training.brown.edu.

NCURA EDUCATIONAL PROGRAMS

- **NCURA 53rd Annual Meeting**
  November 6-9, 2011
  Washington, DC ~ Washington Hilton Hotel
  Registration open through 10/3/11
  http://www.ncura.edu/content/educational_programs/sites/53/index.php

- **Hold the Date:**
  2012 Financial Research Administration Conference
  March 26-28, 2012
  Orlando, FL
  Details to be posted soon.

NEW OSP TRAINING MODULES COMING!
OSP is in the process of finalizing new classes and will be rolling them out soon.
- *Salary Cap Policy & Procedures*
- *Cost Sharing Policy & Procedures*
- *Budgeting*
- *How to Read a Funding Opportunity Announcement*
- *Research Equipment & Property Management*

SPONSORED PROJECTS REPORTING

Reporting User Group Meetings

October's Reporting User Group Meetings are open to all department administrators.

OSP has joined with CIS to combine our next Reporting User Group Meetings with CIS' hands-on Cognos Training. The meeting will familiarize you with the OSP reports that are now available; the hands-on training will show you how to maneuver through Cognos and the OSP reports.

Wed, Oct 19th, 2011 2:00pm-4:00pm in CIT Building Room 269
The direct registration link for this session is: http://training.brown.edu/index.php?eventID=6409

Tue, Oct 25th, 2011 9:00am-11:00am in CIT Building Room 269
The direct registration link for this session is: http://training.brown.edu/index.php?eventID=6410

For more information, please contact Bethany Cherms, Systems Manager (bethany_cherms@brown.edu)

Report Spotlight

STANDARD AWARD, PROPOSAL, EXPENSE ACTIVITY REPORT:
This report contains 3 reports show Awards, Proposals, and Expenditures managed by a department. The report time frames include the period selected, the previous year to date for the same period selected, and the prior 4 fiscal years. In addition, the report will return 4 graphs to highlight the activity.

Report Benefit – Allows a review of department's proposal, award, and expenditure activity for a selected period. It also provides a comparison to prior years' activity.

Report Location – Sponsored Projects Reports for Departments Folder > Proposal / Award / Expense Report Folder

Sample graph output for a report run for 1 month:
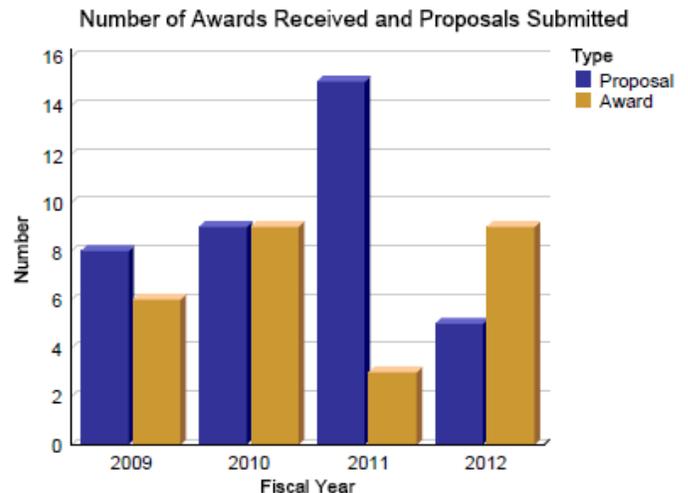
Requesting an Ad Hoc Sponsored Projects Report

All Sponsor Projects report requests should be sent to:

OSP_Reporting@brown.edu

In addition, a new form has been created to be used to request ad hoc reports:
http://research.brown.edu/pdf/OSP_Report_Request_Form_12_10.doc .