Uniform Guidance-Effort Reporting Alternatives, MC Gaisbauer & Todd Vizenor
See PowerPoint presentation attached

- The Federal Office of Management and Budget (OMB) issued reformed guidance for grant-making institutions and award recipients that provides a government-wide framework for grants management
- 3 requirements:
  1. “The system for establishing estimates produces reasonable approximations of the activity actually performed.”
  2. “Significant changes in the corresponding work activity (as defined by the (institution’s) written policies) are identified and entered into the records in a timely manner.”
  3. “A process to review after-the-fact interim charges…made based on budget estimates.”
- This means that effort is no longer the focus of the federal regulations, documented Internal Controls are. Thus, UCSF no longer has to use the same internal controls that we currently use to meet the 3 requirements, so we can update what is required internally for reporting, if faculty is interested in making changes
- UCSF currently does verification twice a year (January-June, June – December).
- If we update our internal controls, it is expected that we can remove a good amount of responsibility from PI's into one award verification progress report.
- The goal is to take away work, rather than add when considering the task of documentation
  - We are looking at how often we need to do reporting, coordinate timing of and doing more online to further decrease the burden
- Replace all current verification processes to an online tool for all information needed for the review
- We will need to monitor the process and plan on doing pilots with PI’s that have a heavy burden vs those with small burdens to see if time is saved and if we see higher levels of compliance (aka people actually doing the required verifications)
- An executive review committee is needed, we are hoping to have members of RAB on it to help pick the pilot cases and oversee the project
- The majority of people do not understanding effort reporting, it takes a lot of FTE’s to manage, and most PI's do not know what they are verifying
- We are looking at all of our current platforms/tools to see if any can be adjusted for this process
- We need to remove unneeded reports from our internal reporting, before we could request the federal government to remove certain criteria.

Questions/Comments:
- How much time would be saved?
  - It will vary by person/grant, for example on PI has over 1,800 reports
- Concerns that if each report is tied to the award calendar (which varies) that reporting will need to be done continuously, rather than just twice a year
  - The idea is to combine all reporting together (i.e., progress report and effort/verification reporting at the same time), which will possibly eliminate certain reporting needs
- Is this similar to what UCI does?
  - At UCI, it was just for payroll; at UCR, they did a 2-part process, i.e., payroll and project verification, we are going to do it just for projects
  - The University of Chicago is the only school with an actual solution, many other school are looking into it

Next Steps:
• Georgina Lopez, Christine Razler, MC Gaisbauer and Winona Ward will be on the executive review committee

**Board Discussion: Strategies and priorities for RAB in 2016-2017: Best practices to represent the needs of UCSF**

See PowerPoint presentation attached

• The main goal of RAB is to support our research mission
• Reviewed charge/purpose
• Bill Seaman really worked to identify issues for presentations to the board. However, members of the board are the experts in their areas and know the various issues best. Would like to move to the model that members of RAB suggest issues for the board to review/consider/comment on
• RAB originally stood for Research Administration Board, but was changed to Research Advisory Board as that is what everyone called it and the board is for advisement vs provided actual decision making power
  o Gene Washington created the board and depended on it for advice/counsel
  o Jeff Bluestone did not use the group much
    ▪ RAB was not consulted I a large capacity during operational excellence
  o Under current leadership, RAB’s input is valued
    ▪ Administrative leadership finds the board to be very valuable, as it is one body that can provide feedback on pressing issues and requests and stances from the board have helped certain issues be addressed
      • Including the subaward backlog and uniform guidance
    ▪ There are very few forums on campus that have as much insight and areas of expertise
      ▪ RAB has been invaluable to CTSI
      ▪ RAB is a great example of true shared governance, and is a space to bring challenges, discussion, be provided recommendations, etc.
• It could be productive to provide an overview of specific advisory boards/groups under the various departments
• Increased Communications→opportunity to solicit information from our different populations, could use direction on how to get information and how to better communicate across the different areas and relay what RAB is doing/discussing

**Questions/Comments:**

• Do we want routine reports? How do we want issues to be brought forward?
  o Would like to see a mix of new and old business/issues
  o Do annual reviews/reports on issues that have been presented at RAB
• Do we have a relationship with the Academic Senate Committee on research?
  o None currently, we should figure out a way to have the two bodies officially work together
    ▪ Their chair used to sit on RAB, but the role of the committee changed when RAP took over research grant oversight
• Suggestions for next steps:
  o Identify topics for Dan’s EVCP Expresso, i.e. RAB topic of the month
  o Create a forum for 2 way communications
  o Have other sites link to RAB minutes
  o Link various information on the RAB webpage
  o Provide RAS the link to the RAB website
  o Take stances/review various campus initiatives that affect researchers
  o (Re)Introduce RAB to campus
    ▪ It seems as though a lot of faculty (especially junior) are not aware RAB exists
      • Possibly on an annual basis
  o RAB representatives attend other similar groups/meetings
• Issues for future discussion/presentations
  o New NIH policies
  o Investigational Drugs
  o IT + various other systems
  o Follow up on past topics (including mandatory trainings, survey results, uniform guidelines)
  o Access for ZSFG Faculty to unified clinical databases
  o Contracting (especially with industry)
    ▪ Invoicing (invite Terri O’Brien to present at RAB)
    ▪ Institutionalization of various standard requirements
  o Cores
    ▪ Missing support in some areas and have unequal access in others

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These notes are intended to provide a summary of action & follow up items; a few discussion highlights are included.
• Consolidate and utilize all resources
  • Address how they are governed and supported
    o Clinical Trials infrastructure, OTM office (especially around delays)
    o Space policy and allocation
      • No transparency in how this happens
    o Input on our various campus initiative’s pain-points
      • Research analytics ➔ focus on investing in faculty
    o Bigger picture issues
      • Over-regulation, inspections, etc.
    o Human research updates
    o Post docs moonlighting jobs

Next Steps:

• Please send any additional Issues for discussion/presentations to Pam and Michael
Research Advisory Board
Proposal Review
Award Verification Project

Replacement of Effort Reporting

MC Gaisbauer, Assistant Controller
Controller’s Office

10/4/2016
Agenda

- Uniform Guidance Opportunity
- Current State: Effort Reporting and Other PI Responsibilities at UCSF
- Proposal Review: Award Verification
- Next steps
Overview of Uniform Guidance

Uniform Guidance released in 2014

The Federal Office of Management and Budget (OMB) issued reformed guidance for grant-making institutions and award recipients that provides a government-wide framework for grants management.

Uniform Guidance aims to:

- Streamline guidance for Federal awards
- Reduce the administrative burden on award recipients
- Increase transparency and guard against the risk of waste and misuse of Federal funds
Budget estimates may be used to support Federal charges provided that 3 requirements are met:

1. “The system for establishing estimates produces reasonable approximations of the activity actually performed.”

2. “Significant changes in the corresponding work activity (as defined by the {institution’s} written policies) are identified and entered into the records in a timely manner.”

3. “A process to review after-the-fact interim charges…made based on budget estimates.”

Effort is no longer the focus of the federal regulations, documented Internal Controls are.
An Opportunity to Improve

Under Uniform Guidance, UCSF has the opportunity to:

- Eliminate administrative burden of effort reporting and costs associated with supporting the Effort Reporting System (ERS)
- Replace separate project compliance tasks with one simplified, automated, and auditable task that verifies expense at the award level
- Enable award management conversations between PI and RSA
- Significantly improve the process and reduce time spent on compliance efforts by UCSF – PI, RSA, and Central Offices
Current State: Effort Reporting and Other PI Responsibilities at UCSF

Today, UCSF PIs are asked to perform many separate tasks:

- Effort reporting
  - Twice a year based on the calendar
- Subcontract invoice approval
  - As invoices are presented for payment by the subcontractor
- GL Verification
  - Each accounting period
- Financial Status Report / Final Invoices
  - Award budget period

These tasks are in addition to the program tasks related to the award, such as progress reports.
Award Verification Proposal

Proposal to implement Award-Based Verification

**Goal**: Develop and implement a process and technical solution that leverages existing controls to verify all project expenses on an award in an efficient and transparent manner.

**Objectives:**

- Reduce the administrative burden felt by PI and RSA
- Meet compliance and audit requirements of Uniform Guidance
- Leverage PI knowledge to validate expense on all projects across an award
- Retire the **Effort Reporting System** and expand verification beyond payroll expense
- Increase the effectiveness of implementing and rate of compliance with Uniform Guidance
Vision:

Replace the multiple verifications and sign-offs performed by the PI with a single verification of all expenses, payroll and other costs, that is performed on a cycle aligned with the other PI required activities of an award, such as progress reports and through an on-line tool that facilitates collaboration with the RSA.
Project Approach for Award Verification

- User-based requirements gathering for new process and technology
- Identify technical solution development for an Award Verification system that provides transparency into the process for PI and RSA collaboration
- Pilot and phased implementation of new process and technology
- Retirement of the Effort Reporting System
Next Steps

- Appoint executive committee to oversee project
- Determine departments and participants for requirements gathering and pilot
- Review available technology to determine possible solutions
Questions?
Discussion on the Focus and Direction of the Research Advisory Board (2016-2017)

Previously (through 2012) called the Research Administration Board
The charge to the RAB is to **identify** research-related issues that are important to investigators at UCSF.

work with the office of the Executive Vice-Chancellor/Provost (EVCP) on improving **operations** that affect research.
Past major efforts and focus

• Operational Excellence (Research management services)
• Integration of Core Facilities (biobanking)
• BearBuy
Other examples of past issues

• Space planning and benchmarks for allocation (periodically addressed)
• eProposals
• Campus-wide financial planning
• Function of the Office for Sponsored Research
• Library services
• Indirect costs waivers – results from a campus-wide task force
• Computer Encryption and IT security (recurrent)
• Resource Allocation Program (RAP)
• Contracts and Grants issues
• Changes in Clinical Research Services
Suggestions (from the past) for defining issues

• Identify a way to collect feedback from faculty, perhaps via a suggestion box online
• Identify a topic of the month that the EVCP is looking for feedback on, and have members collect anecdotal feedback on that topic, and then bring those back to the group
• Invite key personnel from various areas to give updates at future meetings
• Set aside a few minutes at the end of each meeting to bring up issues for discussion
Questions

• What research issues require input or feedback from RAB in 2016-2017.
• How can we organize ourselves to direct our feedback to focus issues related to research administration?
What is our process; for example...

- How do we define issues and provide feedback appropriate to the role of RAB to address questions raised by Dan (last meeting)
  - ”We may have room to move 20 PI’s to Mission Bay. However, there is an estimate that 70-80 have indicated they would move if possible”
  - If there is space at Parnassus what is recommended to keep them at Parnassus and better supported?
  - Possibilities:
    - The connected floors of the hospitals to other buildings offers a unique opportunity for connecting translational science to patient care
    - Need better access to core facilities
    - Divide people by jobs rather than departments
    - Develop a solid plan for a multi campus UCSF, that works for everyone