RESEARCH ADVISORY BOARD (RAB)

January 6, 2015 8:30-10:00 a.m. S-30

Attendees: Diane Barber, Chip Chambers, Jane Czech, Clarice Estrada, Cathy Garzio, Mounira Kenaani, Jim Kiriakis, Larisa Kure, Gretchen Kiser, Steve Lazarus, Georgina Lopez, Dan Lowenstein, Wallace Marshall, Teresa Moeller, Suzanne Murphy, Michael Nordberg, Marge O'Halloran, John Radkowski, Christine Razler, Bill Seaman, Brian Smith, Matthew Springer, Paul Volberding **Not present:** John Ellis, Kathy Lee, Holly Ingraham, Eric Mah, Louis Reichardt, Nirao Shah **Guests**: MC Gaisbauer, Nilo Mia, Terri O'Brien, Lani Pettersen, Alex Schnoes **Coordinator:** Jamie Antonazzo

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PRESENTATION: T32 Tracking and Reporting Database Project – Terri O'Brien and Alex Schnoes

Alex and Terri presented an overview of the T32 Trainee Tracking Project, which is currently about to start initial beta testing. Historically, T32 trainee tracking had been handled by each T32 program individually, with 3-4 programs using the "DeRisi" system. This project seeks to streamline this process for the stakeholders -T32 PIs and Administrators, Participating Faculty, Trainees, and Alumni. Currently in scope for the project are data for key T32 tables; out of scope are evaluations, non-NIH related events, and funding data.

Questions/Comments:

- As a PI with a T32 grant, how would we interact with this system? --Most likely you would interact as a participating faculty member; faculty who have trainees in labs will receive an email once every six months, or once a year (details are TBD), prompting them to update current trainee information via a web form. Log in will not be required in this case.
- It seems unreasonable to expect faculty to be able to update every six months. --The system can be tailored to specific needs, and updates will not be forced.
- What information will be captured by this system? Is it integrated with other systems? --Right now, integration is planned with the AMP system for graduate students, as well as other student information systems, and EDS for faculty and postdoc information. We are also planning to create an intake form for postdocs, to capture more information, and to create a process for capturing alumni data.
- Who is in the beta group? -- The beta group is not strictly defined – many people have contributed and are involved on different levels. Please contact Terri to suggest additional programs to contact.
- How will the output be presented? –Since the NIH tables often change, our goal has been to create structured output that includes as much information as possible, and gets as close as possible to the information needed for the tables.
- Should someone with a new T32 access this system by working with RMS? –They should contact Terri directly - she will be able to share the current information with them.
- How are PMCID numbers being handled for publications? –A PMCID number is required to add a publication, which allows the rest of the information to populate on the form. It is possible to enter something that does not have an ID (i.e. book chapters) but the goal is to stop papers without ID numbers from being added.
- Can this be expanded to help K awardees? –Right now, the focus is on T32, but the back end of the system is being built with the goal that it could potentially be used for other grants.
- What is the ongoing funding source for maintenance? –This is currently under discussion.

PRESENTATION: Update on OMB's Uniform Guidance – *Nilo Mia/Grant Reform Task Force*

Nilo Mia, along with several other representatives from the Grant Reform Task Force – MC Gaisbauer, Lani Pettersen, Marge O'Halloran, and John Radkowski – provided an update on the uniform guidance which was published by the White House Office of Management and Budget (OMB) in December, 2013. According to the initial timeline, all agencies were due to submit implementation guidelines in June, 2014, however this has not yet happened. The task force has met regularly to review the Uniform Guidance, and has come up with guidelines for implementing the changes, which will be updated as the implementation guidelines from NIH and other agencies are released. Job aids will be made available soon for key changes, which include:

Charge to the Research Advisory Board (RAB)

- To provide input to the Office of Research, and ultimately the EVC&P, about the needs of investigators and administrators in conducting research and administering extramural funds.
- To guide priority setting and critical assessment of quality improvement efforts in the Office of Research
- To work with the Office of Research staff to ensure the successful implementation of the current Quality Improvement Project

- Computing devices are allowable as a direct cost when the device is used to advance the aims of the project, but may be used for other purposes, as well; administrative and clerical personnel are allowable as a direct cost when administrative services are *integral* to the project, and when the individual can be specifically identified with the project, and approved by the sponsor.
- Encouraging family friendly policies – temporary dependent care costs while an individual is traveling are allowable, and for hosts of conferences, the costs of identifying (but not providing) locally available child-care resources are allowable. Since these policies affect UC wide travel and conference policies, implementation are pending review and guidance provided by UCOP before implementation at UCSF. Senior staff in UCOP offices have been asked to review and provide guidance this issue.
- Additional flexibility to charge publication and printing costs to federal awards after the performance period has ended.
- Changes to PI disengagement rules - The new guidance replaces "absence" with "disengagement," which means we do not need to seek prior approval for PI sabbaticals if we can document that the PI's work on the project is ongoing at no less than 75% of the level of effort committed.
- Refined characteristics for subawards – There is a new option for each Federal agency to require us to document how Subrecipients and Contractors (formerly "vendors") are determined. The characteristics of Subrecipients and Contractors have not changed, but we are now required to document how we made decision as to which is which. Contractors perform "work for hire" as part of their regular business model. Importantly, Subrecipients have publishing rights to their portion of the project, while Contractors do not.

Questions/Comments:

- Can you provide an example of an administrative service that would be allowable versus one that is not? –Administrative personal doing monthly reconciliation and processing purchases should be listed as indirect costs, but on a large project, someone doing outgoing subaward management would be allowable, including for an RO1, if the needs of the project justify it.
- The group noted the importance of RMS having consistent answers on these changes, which will allow departments to train their liaisons with the correct information. Posting the information online would also be helpful.
- Now that UC has a commitment to monitor the standards of service, who should be contacted in the case of disputes? This process has not been established yet, and the group agreed that it will be helpful to create a process for this, and clearly communicate this to faculty.
- A suggestion was made that it could be helpful to add a line to the invoice, indicating the new guidance, so that faculty members are aware before they sign off.

Next Steps:

- The task force plans to present this information at town halls, and other meetings of key stakeholders, and information and updates will be posted on the Office of Sponsored Research (OSR) website as well.
- The task force will provide a 3-4 slide deck to the group so that they can present this information at various meetings.
- The task force also encourages departments to contact them to present at meetings where appropriate.

PRESENTATION: New Biosketch Format – *Marge O'Halloran*

Marge explained the new mandatory requirement for the biographical sketch format, which will be effective with application due dates beginning May 25, 2015. Federal agencies implementing the new format are: the NIH, and the Agency for Healthcare Research and Quality (AHRQ). The OSR encourages investigators to begin revising their biosketches now, and tools to implement the new format will be posted on the OSR website: http://osr.ucsf.edu/content/nih-biographical-sketch-format The new format makes the following changes:

1. Extends page limit from 4 to 5 pages
2. New Section C-Contribution to Science, requires researchers to:
   - Describe up to 5 significant contributions with historical background
   - Outline findings of prior work, and subsequent effect

- Describe their roles in the discoveries
- Reference up to 4 publications for each discovery
- Provide a link to a full list of their publications in MyNCBI or SciENcv

Questions/Comments:

- The group commented that this seems very redundant to the personal statement – even though the personal statement is meant to be more general, and the biosketch is more specific to the project, it seems like much of the information will overlap.
- The group agreed that workshops offering information on tips and tricks would be very helpful, and that providing more formal mentoring than we've done in the past would be useful.
- The group also suggested taking a more creative approach – a small investment in a creative and informative video could be a fun way to present this, and could yield huge results.

T32 Trainee Tracking Project

January 2015

Alexandra Schnoes and Terri O‘Brien

T32 Trainee Tracking Project
Motivation

- T32 Trainee Tracking is currently handled by each T32 program individually with individual processes
  - Small number of programs have databases
  - 3-4 programs using “DeRisi” system

- NIH reporting requirements are time-consuming and challenging, affecting many faculty and staff on campus. We need a system that will ease this process and will support dozens of programs at UCSF

- Stakeholders: T32 PIs and Administrators, Participating Faculty, Trainees, Alumni

T32 Trainee Tracking Project
Scope

- Project is currently managed by the Office of Research with additional funding from the SOM Dean's Office
- Requirements have been gathered
- Not all needs will be addressed in the first version:
- In scope:
  - Data for key T32 tables
- Out of scope:
  - Non-T32 program management
    - Evaluations
    - Events that don't technically need to be reported to NIH
  - Funding data that needs to be part of the T32 tables

T32 Trainee Tracking Project
Development

- The work will be done by the UCSF Information Services Unit (ISU) Salesforce team.
- The system will reside on Salesforce and use a series of customized screens for data entry and editing. We will leverage Salesforce for needed notifications and reports.
- A budget has been approved and a team selected.
- Active development work has commenced and will continue into early 2015.

Overall Project Approach

- Project is being divided into several ‘epics’ (large, high-level blocks of functionality) and ‘stories’ (small, discreet features)
- This functional decomposition is done to make the development and testing more manageable and to give stakeholders more flexibility in determining the course of the project
- We will build, test, and demonstrate a small set of functional ‘chunks’ for stakeholder review every 2 weeks (scrums)

Proposed Project Trajectory

- Foundational Architecture, focus on Program Administrator actions, Super User administration, initial reporting capability (Oct-Nov)
- Focus on faculty, trainees, alums, additional reporting, user testing (Nov-Dec)
- Initial Beta Release (Jan-Feb)
- Testing, Refinement, Recalibration (Feb-Mar)

The Team

- ISU is heading up the development effort of Trainee Tracking
- Each team member has worked on many different Salesforce projects for UCSF
  - Alex Schnoes & Terri O’Brien (Product Owners)
  - Kevin Haney (Project Mgr/Scrum Master)
  - Victor Vargas Reyes, Sebastian Canseco, Allan Molina (Developers)
  - Jeannie Louie (Business Analyst)
  - Jess Wainer (UX Design)
  - Brenda Perez (QA)

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Research Advisory Board

"What PIs Need to Know"

January 2015

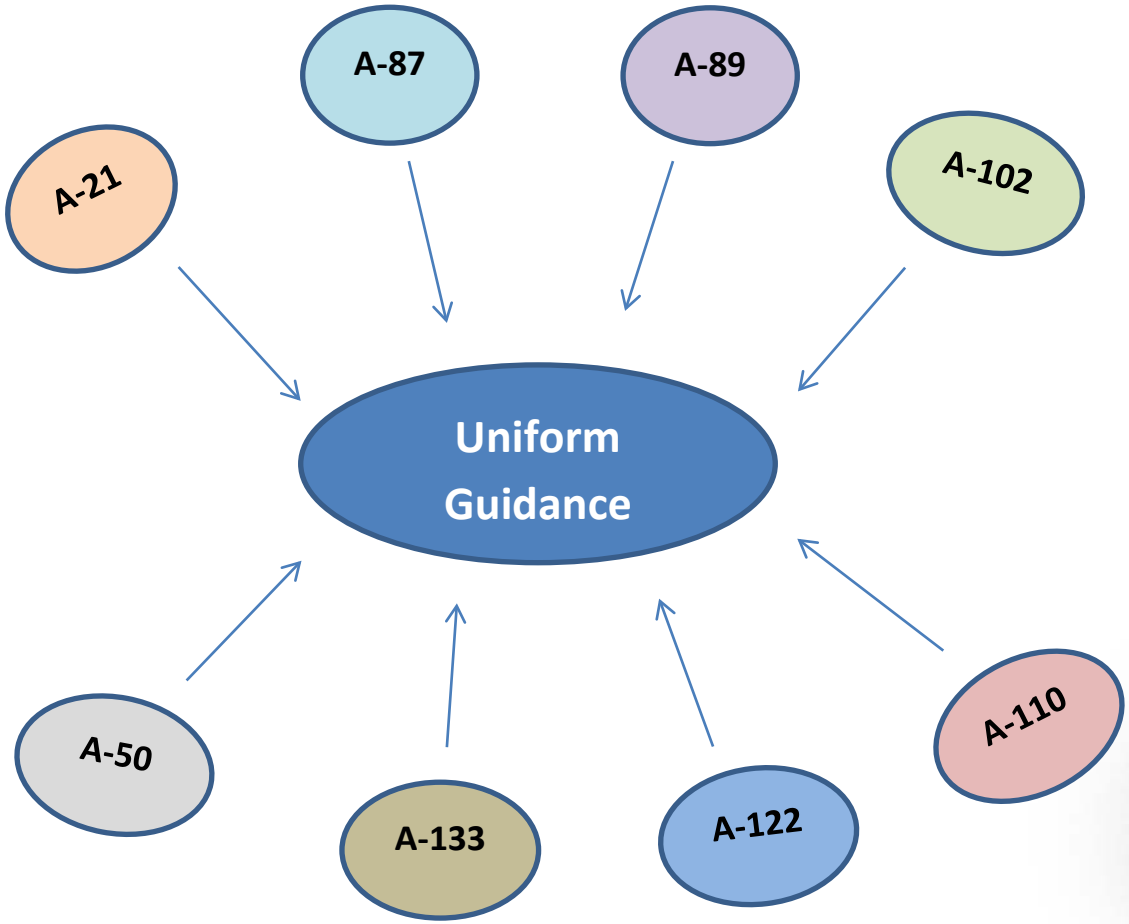
Uniform Guidance (UG)

- Background
  - When and Why?
  - Overview
- Important Dates
- Highlights
- Next Steps?
  - Partners in Stewardship

When and why did this process begin?

- Uniform Guidance developed in response to November 23, 2009 EO 13520 on *Reducing Improper Payments* and the February 28, 2011 Presidential Memorandum on *Administrative Flexibility, Lower Costs, and Better Results for State, Local, and Tribal Governments.*
- In the documents, President directed OMB to work with Executive Branch agencies and other key stakeholders to evaluate potential reforms to Federal grants policies.
- The Council on Financial Assistance Reform (COFAR) was established in October 2011 and has led efforts to improve delivery, management, coordination, and accountability of Federal grants and cooperative agreements, which includes the development of the Uniform Guidance.
- The Final Rule was published in the Federal Register on December 26, 2013.

OMB Circulars Consolidated into UG



Uniform Guidance Overview

The Uniform Guidance (UG) is much more focused on internal controls over strict compliance with a set of rules.

- These changes have resulted in greater administrative flexibility for the grantee and also greater responsibility in maintaining internal controls.
- For example, while we have more flexibility to charge certain expenses as direct costs, we also have an increased responsibility to justify these expenses as direct costs.

Important Dates to Remember

December 26, 2013	*Effective Date of Uniform Guidance*
June 26, 2014	*Federal Agencies submit draft implementation regulations to OMB*
December 26, 2014	Effective date for Non Federal entities (UCSF) to comply with Uniform Administrative Requirements for **NEW AWARDS** and amendments to **EXISTING AWARDS**
July 1, 2015	Effective date for audit requirements under UG
July 1, 2016	Effective date for procurement standards under UG

Effective Date Guidance

During the transition to the UG, UCSF will manage awards under the old and new policies.

- The UG applies to all new and renewed awards issued on or after December 26, 2014.
- Individual agencies will apply the UG to continuation, renewal, and supplement awards issued on or after December 26, 2014 at their discretion.
- In the absence of clear guidance from the sponsor, UCSF will adhere to the policies of the original award.
- Each award will be managed under a single policy. If the UG applies to a supplement, it will apply to the entire award.

Uniform Guidance Highlights

- Allowable / Unallowable Costs
- Subawards
- Procurement

Allowable / Unallowable Costs

Computing devices (200.453)

- Allowable direct cost when the device is used to advance the aims of the project, but may be used for other purposes, as well.

Administrative personnel (200.413)

- Allowable direct cost when administrative services are *integral* to the project, the individual can be specifically identified with the project, and approved by the sponsor. Approval may be requested through the proposal or in writing after the award is made.

Allowable / Unallowable Costs

Encouraging "family friendly" policies however policies are pending implementation until UC and campus policies are consistent across all fund sources.

Conferences (200.432)

- Provides that for hosts of conferences, the costs of identifying (but not providing) locally available child-care resources are allowable (*when consistently treated)*.

Travel Costs (200.474)

- Provides that temporary dependent care costs required to enable personnel to travel in support of the project's aims are allowable (*when consistently treated)*.

Allowable / Unallowable Costs

Additional flexibility to charge publication and printing costs to federal awards after the performance period has ended (200.461)

- UCSF is still designing procedures to address how to capture expenses incurred after the performance period and still comply with 90-day closeout requirement.

Allowable / Unallowable Costs

PI Disengagement (200.308)

- Under the existing guidance, sponsor approval is required if the PI is absent from the awardee institution for more than 3 months, or if PI's effort will be reduced by 25% or more.
- The new guidance replaces "absence" with "disengagement," which means we do not need to seek prior approval for PI sabbaticals if we can document that the PI's work on the project is ongoing at no less than 75% of the level of effort committed.

Subawards

200.330 Subrecipient and Contractor Determinations

- New option for each Federal agency to require us to document how Subrecipients and Contractors (formerly "vendors") are determined.
- Characteristics of Subrecipients and Contractors have not changed.
  - Subrecipients are collaborators who contribute to the design, implementation and reporting of research.
  - Contractors perform "work for hire" as part of their regular business model. Importantly, Subrecipients have publishing rights to their portion of the project, while Contractors do not.

Subawards

Subrecipient examples

1) UCSF works with The Kenya Medical Research Institute (KEMRI) to test the effectiveness of specific interventions in halting the spread of disease. KEMRI personnel contribute to the design and implementation of the study at their site, and also to the research reports and publications.
2) Study Sites are Subrecipients because they must exercise judgment to recruit participants who meet the criteria established by the specific aims of the parent project.

Contractor example

1) UCSF sends assays to Affymetrix for whole-genome tests. There is no judgment or analysis on the part of Affymetrix. The service provided is routine and not unique to the project.

As best practice, UCSF will document its determination of Subrecipients and Contractors, and it will apply these definitions consistently across all projects.

Subawards

Requirements for Pass-through Entities (200.331)

- The PI's signature on Subrecipient invoices indicates that the work performed fulfills the sub's obligation to the project.
- Subrecipients must be monitored to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward.
- UCSF is obligated to pass-through indirect costs to Subrecipients at their negotiated rate, or the rate provided by the award, whichever is lower. Subrecipients without a negotiated rates agreement may collect indirect costs at a de minimus rate of up to 10%. We will continue to use the 8% rate for foreign Subrecipients on NIH grants until the NIH releases its implementation guidelines to clarify this point.

Subawards

Allows for the use of fixed amount (fixed-price) subawards (200.332)

- Only with the prior approval of the Federal awarding agency.
  - Prior approval may be inferred if the intent is included in a proposal submission and awarded.
- Only up to the Simplified Acquisition Threshold ($150,000).
  - The $150,000 cap may be problematic for some projects.

Procurement

Procurement Standards (200.317-326)

- **New Procurement Standards will be effective July 1, 2016.**
- Campus Procurement staff is working with Office of the President to clarify and develop guidance around the new requirements. Additional communications will address these changes.
- Example of the new requirements includes, changes in processes including:
  - Quotes or informal bidding for transactions between $3K and $150K
  - Federal Contracting Officer to approve sole source contracts over $150K

Next Steps

Where do we go from here?

- Communicate with academic community and research administrators
  - Leveraging existing meetings
    - Research Administration Town Hall
    - School of Medicine Managers Meeting
    - Research Administration Think Tank
    - RMS Client Meetings
  - OSR Website
  - E-mail list serve

Partners in Stewardship

OSR, CGA, and BRM look forward to working with departments to ensure alignment with the Uniform Guidance. Our joint efforts will enhance our competitive advantage for future proposals, as proposal review now includes a risk-based analysis of the institution's (200.205):

- Research performance
- Compliance record
- Financial stability
- Internal control environment

UCSF Grant Reform Task Force Contacts

Budget and Resource Management Office

- Nilo Mia
- Morissa Gleichenhaus

Office of Sponsored Research

- Research Management Services
  - Marge O'Halloran
  - Lani Pettersen
- Government and Business Contracts
  - John Radkowski

Controller's Office

- M.C. Gaisbauer

Supply Chain Management (Procurement)

- Rich Taylor

Audit Services

- Tom Poon

UCSF Website

Office of Sponsored Research
Uniform Guidance
http://osr.ucsf.edu/content/uniform-guidance-federal-awards

Other Websites

Uniform Guidance, Title II CFR Part 200
www.ecfr.gov

Federal Register Notice with Preamble
https://federalregister.gov/a/2013-30465

Council on Financial Assistance Reform
www.cfo.gov/cofar

Questions and Concerns about the UG
cofar@omb.eop.gov

OFFICE OF SPONSORED RESEARCH

NEW NIH BIOSKETCH FORMAT

Research Administration Board -- January 2015

New Biographical Sketch Format

- Mandatory requirement effective with application due dates May 25, 2015 and forward.
- Federal agencies implementing the new format requirement:
  - National Institutes of Health (NIH)
  - Agency for Healthcare Research and Quality (AHRQ)
- Allows researchers to describe and frame their scientific contributions

New Biographical Sketch Format

- Extends page limit from 4 to 5 pages
- New Section C-Contribution to Science, requires researchers to:
  - Describe up to 5 significant contributions with historical background
  - Outline findings of prior work, and subsequent effect
  - Describe their roles in the discoveries
  - Reference up to 4 publications for each discovery
  - Provide a link to a full list of their publications in MyNCBI or SciENcv

New Biographical Sketch Format

- Tools to Help Implement the New Format
  - OSR website (http://osr.ucsf.edu/content/nih-biographical-sketch-format) will house links to:
    - NOT-OD-15-032
    - Aids to use MyNCBI
    - Aids to use SciENcv
    - Biosketch template
    - Sample biosketch template with guidance

New Biographical Sketch Format

- OSR encourages investigators to revise their biosketches now
- RMS will remind their investigators and departments of the new policy