ROC Meeting Notes
Wednesday, November 4, 2020
9:00 – 10:00 AM

David Furman, Information Technology & Risk Compliance

- National Defense Authorization Act, Section 889 Certification – Gov't contractors have to certify that they are not using the equipment. This process went into effect August, 2020. Please see attachment for reference. If this shows up in any of your paperwork, please forward to David and he will be able to assist you with completion.

Angela Jordan, Research Communications, Development and Learning

- New Internal Funding Program – Social Justice Research Initiative: On Nov 1, had major deadline for internal program. Another deadline coming up on Nov 12 for Social Research Injustice Initiative program. Eligibility criteria the same as the Faculty Development Grant. Look at program guidelines. This grant will offer two $10,000 grants each round. This is a 1-year grant and will begin sometime in 2021. The program's intent is to be Seed Funding.

Matthew Reichert, Research Communication, Development and Learning

- RCR Requirement for Faculty **-** This is a reminder that, as of Fall, 2019, all faculty engaged in research and other sponsored and unsponsored projects are required to attend RCR classroom instruction that entail:

  1. Attend, at minimum, three face-to-face training sessions each academic year. The training topics vary year to year. This will help ensure continuity of learning and engagement in fundamentals on academic integrity and research ethics.
  2. To further enhance online training, faculty must participate in the following core classroom sessions within a two-year period:
     - Data Management and Statistical Analysis
     - Research Misconduct
     - Conflict of Interest

- Each academic year, the RCR educational outreach program will be publicized with a complete list of topics and registration details which will be posted on the Research Compliance RCR webpage and the Research Education and Learning Portal:

  https://www.southalabama.edu/departments/research/compliance/responsible-conduct/training.html

Deborah Musgrove, Sponsored Projects Administration

- NSF Virtual Webinar - NSF holding a virtual conference on 11/16, 11/20, 11/30, 12/4. Enrollment opened 10/26. To register, please go to the following link to register: https://www.nsf.gov/events/event_summ.jsp?cntn_id_301319

- Cayuse Notes - If you have attachments post routing approval, please make us aware the documents are there so that they can be properly reviewed before sending to sponsor. Make sure the PI certifies the proposal by helping us keep an eye on this so that we do not run into any issues.

Gina Hedberg, Sponsored Projects Administration

- CUI Project Personnel – from the Office of Security, Risk & Compliance – We have a few CUI projects on campus from a couple of different colleges and those standards are treated much differently than our standard basic research fundamental research projects are treated. There are security regulations that are very stringent and they come with penalties if not followed so, we have to be careful that they are adhered to.

- If you have a project that has been identified as CUI and it is awarded, the first thing you need to do is notify David Furman, and he will be the person that works with PR do determine who needs access on these projects. Access is very restricted and who has access will be determined by a conversation between David and the PI relevant to the roles that those individuals would handle. Some projects require U.S. citizenship verification, and again, that is something David will work with, but all the hiring paperwork must be complete before Human Resources is able to help with that citizenship verification. We cannot do a presumed hire, a hire that is in progress, they are requiring all paperwork be in place. This is something to think about when you are bringing in personnel that may not be on campus now or you may be hiring postdocs and graduate students that might be involved in the projects. CUI training includes short videos that are embedded that is required of anybody working with these projects which will be provided to you.

- You will receive a certificate once you have completed the training videos, which will need to be sent to David to be kept on file. A nondisclosure agreement will also need to be completed which will give you the rules of competence and security that we have to maintain associated with those projects. Another aspect of CUI is export training – Angela Williams will be the key person in Compliance that will make sure you receive the information. Again, it is a series of videos via CITI that you have to watch and answer questions to make sure that you understand all of the export rules as they apply to some of these projects.

- Threat awareness – insider threat is a very real issue among projects globally as we have seen in the headlines of the newspapers, and is something we will not be removed from just because we are South Alabama, this happens all of the time. This is something David will handle personally or set up personally, he may not be the exact person that conducts it, but he will make sure that it is done and work with the personnel on the projects.

- If you have personnel that disengages, possibly a faculty member leaving the University, or even a student that's leaving, David needs to know as soon as possible because there has to be an exit interview conducted with that individual, and there could be information associated with equipment or lab space so, please try to let him know because those in the departments and colleges know that information more quickly than SPA. David is currently working on memorializing this process in a form which we will send out to the ROC and post it on the website.

Angela Jordan, Research Communications, Development and Learning

- Fundamentals Class – this is a six month course which meets every other week for 12 weeks and, each week there will be a different content module that covers different aspects of topics that would be considered fundamental to the job of a research administrator. This would include topics stemming from federal rules and regulations to budgeting and post award management and compliance. The course is intended to help people prepare to take the Certified Research Administrator (CRA) exam. If you choose to take the exam you would initially pay for it and, if you passed, you would be reimbursed and, having that certification enables you to a stipend of $1,200 a year for three years.

- Some of the benefits of going through these courses are that it gives you the certification, the increased knowledge and the ability to function easily in your job. It also gives you credentials if you were to apply for a promotion. It is a great way to increase competency in the skills of research administration.
- In order to join the course, it is recommended that you obtain a letter of recommendation from your supervisor.
- This is a team-based learning class which means that it is on a flipped classroom model. You will do the work before you come to class and then will come to class with this body of knowledge and work with your tem to figure out the answers to these problems. So, it's not just building your knowledge and awareness of research administration information, but it also builds your connections and your network within the University, and also allows you to improve your ability to work in teams.

Deborah Musgrove, Sponsored Projects Administration
- Participant Support Costs – Lately we have been seeing on proposals, participant support costs, that are not truly participant support cost and want to clarify what is a participant support cost and what should not be included.
- The definition of "participant support costs (as defined by 2CFR 200.75) are costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. Uniform Guidance (2CFR 200) requires prior Participant Support Costs under federally sponsored awards. The Participant Support Costs must be incurred within the period of performance of the project and be specifically allowed by the sponsoring agency."
- A participant is defined as a non-USA employee who is the recipient, not the provider, of a service or training associated with a workshop, conference, seminar, symposium or other short-term instructional or information sharing activity. The do not perform work or services for the project or program unless it is for their own benefit. Participants may include students, scholars, and the scientists from other institutions, representatives from the private sector, teachers, and state or local government agency personnel.
- What costs are NOT considered Participant Support Costs? – The intent of participant support is solely to provide financial assistance for participants to attend conferences and training. This does not include honoraria for guest speakers, expenses for the PI, project staff or collaborators to attend project meetings, conferences or seminars, payments to GRAs, or payments or participation in a research project. Costs for hosting the conference or training should be budgeted and charged to the parent budget.
- Two of the biggest issues that we are seeing is on payments to the graduate research assistants – we have had several proposals come through and the stipend and all tuition for a graduate student on a research project was included as participants support costs. These should not be included as participant support costs on a research project. If it were truly a training grant, then it would be considered but, otherwise, it is not.
- The second issue involves incentives made to human subjects for participating in a research project – these incentives would NOT be considered participant support costs. If they are an employee of the University, they are not a participant, period.
- According to UG, it states that participant support costs is exempt from F&A for federal awards; for non-federal awards you will have to read the guidance for the sponsor to find out if F&A is allowable on participant support costs.
- If you want to rebudget from participant support costs into another costs category, that is a prior approval request and we must reach out to the federal agency to get approval for that prior to allowing it. We have had several last minute proposals come through so, if you could keep an eye on this on your end to make sure those are being charged properly, we would not have to completely redo the budget.

- **Julie Schwindt:** We have to segregate these participant support costs, so G&C Accounting sets up a separate FOAPAL and excludes if from F&A, for it and then that way we can pay. If you are getting push back for a faculty member or anyone else that wants to charge something that you know is not allowable, please let OGCA know and it will be moved off that account.
- If you are ever unsure if something that a faculty member wants to put under participant support costs and you are unsure, please reach out to the SPA office and we will be happy to look over it with you and research it a little bit further as to get it taken care of early on.

Julie Schwindt, Finance and Administration
- Cost Transfer – OGCA is still seeing cost transfers older than they would like so, we are going to be revising the Cost Transfer form. Here is a scenario: You have an expense on one grant that you want to move to another grant. OGCA is going to have a field on the form that says, in the event this is denied, where do you want it moved to a non-grant source, because once you put that justification out there on why it's not allowable on the first grant because it's allowable on the second grant, it's no longer allowable on the first grant.
- We will then have to see how much time has passed, what does the justification look like, which could be technical in nature in why this expense shouldn't be on the first grant and should be on the second one – this is a red flag as far as compliance goes, we are not going to approve it to go on the second grant. It doesn't matter how legitimate it is, we will be happy to move it to a cost share account and then, in reality it should be moved to a cost share account if you are saying that it is applicable to that project.
- If the project is too old, we are not going to move it, but we still have to get it off that old project, no matter what. Moving forward, OGCA will need a FOAPAL so if it's denied, we will change the forms and put it through to take it off the old grant and put it onto a departmental source of funding. We also might be able to handle this through an activity code, like we do with closeouts so that way we can keep track of cost transfers that probably should have gone on a project.
- 90 days is the time period, if it is over 90 days you need to start preparing yourself that these are not going to be approved unless there is a VERY good reason, i.e., you are waiting on funding, do a preliminary account and if pre-award costs are allowable or if you think your agreement is going to be back-dated or the award was received late, it is becoming less and less of a reason.
- The big issue is with Federal research grants and research contracts, but, to be clear that, with the stimulus funding we received, we met the threshold last year to submit our disclosure statement to DHHS and it was filed a year ago. This means that all of our projects are subject to cost accounting standards (CAS), we follow the same rules for every project, and it doesn't matter where the money comes from. We are subject to that disclosure statement that is part of our internal control that we apply the same standards to all of our projects.

ROC Meeting Notes
Wednesday, September 15, 2021
9:00 – 10:00 AM

Angela Jordan, Research Communications, Development & Learning
- Internal funding reminders – RSDG update: RCDL is currently in the process of launching all of our internal funding programs for this academic year. The Social Justice Research Initiative, currently accepting applications, is in its second year, and will now fund three awards, an increase of one from last year. The Faculty Development Council programs and Seed Grant to Support the Arts & Humanities will remain basically unchanged from last year. The Research and Scholarly Development Grant, our largest at five awards of up to $25K each, has a new deadline in order to allow researchers to be notified earlier in the spring semester and be able to plan their summer work. The notice of intent will be due by December 1, and the full proposal will be due by January 14, 2022. The notice of intent is required to make a full submission.

Bubba Sheffield, Grants and Contracts Accounting
- Cost Transfers – The revised cost transfer form will be coming out sometime next week and will also be posted on the OGCA website. There will be a line added to Section 1 on the form which states that if a cost transfer request to a grant fund or cost share fund is denied, please transfer to the following department FOAPAL. This will hopefully alleviate some of the back and forth emails that get lost. If you have any questions or concerns, feel free to call us. This will not affect PAs or any payroll, we will continue to do payroll and PAs the same way. We cannot change a PA and put a different fund number on there to move payroll if it is what you want to charge to a grant.
  - **Question:** Do expense transfers still need to be attached? **Reply:** Yes, because if it is denied we are going to change the funds to whatever departmental FOAPAL you included on the expense transfer request form.
- The only other change we will make to the form is on the instruction page where a paragraph will be added to make it clear as to what you will be using this form for.
- Effort Reporting Procedures: Follow-up – In the past, we have told everyone that they have 30 business days from the date the PAR form initially is sent out to get it back to us. That has changed to 30 days from the date they go out. That is how it is now written in our policy and that is how it is going to be – 30 days, not 30 business days.
- The other change that will hopefully help the grant specialists to recover some of these PAR forms quicker where, in some cases people are just not responding, we are going to start is one week before the end of the 30 day return period, we will send out an email and, in this email we will include the grant specialist, the appropriate person whoever's PAR form has not been returned, the appropriate Dean, the Provost – Dr. Kent for all Academic Colleges and Dr. Davis for College of Medicine, the VP of Finance. All of these people will be copied on these outstanding PARS. If we don't get these back within the said timeframe, what we will have to do, for those who aren't willing to certify the effort report, we are going to have to move that effort off the grant and onto a departmental fund. This is the only way we can enforce this because there are not many other options.

David Furman, Information Security & Risk Compliance
- Procedures for access to Controlled Unclassified Information (CUI) – The authorization process could take anywhere from a couple of days to a week, depending on how quickly you can get the training done and also how quickly we hear back from HR.

- It is typically a 5-step process and, if there is a need for you to have access to CUI, I will send you an email ahead of time wilt all the steps of the process.
    - Step 1: Most CUI projects require you to be a US citizen in order to have access to the project CUI information. It is not an absolute requirement for CUI, but it is something the sponsor is free to add and, in the University's case, every project we have has a citizenship requirement. You do not need to do anything for that, we will have HR run a check and they will provide verification of US citizenship.
    - Step 2: Training videos – these are put out by US Archives. There are a series of training videos that will be sent to you that have to be viewed – there are not any quizzes associated with them. The videos are short and shouldn't take more than an hour to view all of them.
    - Step 3: Sign a nondisclosure agreement. The training videos are embedded in the NDA so just click on those links and, when you finish with the videos, sign the NDA and submit it and it will get automatically returned to David.
    - Step 4: Export Control compliance training. The reason for this training is if it is a CUI project coming from DOD, by definition, the technology and materials that you are going to be exposed to and will have access to are going to be DOD articles and they are covered by ITAR, so you have to have that export control training in order to have access. When the information is sent to you regarding the steps, Angela Williams will be cc'd in this email and she will send you the link to the Export Control compliance training. This training is a bit longer, about two hours to complete the modules.
    - Step 5: Threat awareness brief will be done by David which can be done individually or as a group if we have a number of people coming on a project at once. This will take about 25 to 30 minutes. The brief covers actual threats you may encounter as far as people trying to steal or illicitly acquire information related to the project.

Angela Williams, Research Compliance and Assurance
- Research Compliance Newsletter – The RC&A newsletter went out this morning that included the 2020-21 RCR training series and is now open for registration. There have been a few policy changes, so we suggest that you read the policy to catch up on these changes which can be found on the RC&A website under Policies and Procedures.
- Policy changes – effective beginning this RCR training series, all faculty engaged in research and other sponsored and unsponsored projects are required to attend, at minimum, 2 hours of instruction/sessions each fiscal year, which will run from October 2021 to May 2022. So that is only 2 hours required instead of the 3 hours required in the past. The training topics will vary from year to year but faculty must complete the following core sessions within a five year time period.
    - Those sessions are: 1) overview of data-driven research or overview of scholarly-driven research. - you only have to do one or the other, not both; 2) research misconduct; or 3) influence and security for conflict of interest; and 4) rigor and reproducibility (not required for faculty involved in unsponsored research, only those involved in sponsored research).
- The RC&A office will hold four in-class sessions at the Faculty Club, and you also, you have the choice to choose from three session on our campus platform, which will be a recorded session. After you have watched the session, you will take a small quiz where you have to have an 80% passing grade, but you do have about 10 chances to take the quiz.
- The Canvas classes will not open until October so you can go ahead and register now, but they will not be open until October 1 and will go thru May 31. If you register for Canvas, please allow 24 hours to be let in to the course because we have to manually enter your J number for you to have access. For example, if you register Monday, you might not have access to that course until that Tuesday or Wednesday. If you have any questions, please either call me or shoot me an email.

Gina Hedberg, Deborah Musgrove, Sponsored Projects Administration

- Utilizing the Attorney's Agreement Portal – This portal is not to be used to route funding agreements. Every agreement that supports funding at the University should come directly to the Sponsored Projects office. There have been a couple that have found their way into the Legal office and all it does is slow you down because they will stop that and redirect it to our office. And what may have been sitting for a couple of days to go through their approval process, only adds to the time that that agreement will be reviewed and then hopefully, subsequently approved. So, please be mindful of that, if it is an agreement associated with funding for a sponsored project, it does need to come to the SPA office, not to the Legal office.

- Issuance of NSF Grants.gov Application Guide – The grants.gov application guide has been updated which will align with the NSF proposal and award guide. There are a couple of updates on the summary of changes:
  - The research and related forms and instruction page will now have a place for the Unique Entity Identifier that will replace the DUNS number effective April, 2022.
  - The other information form has been modified to clarify NSF's expectations where a foreign organization or foreign individual involvement is considered essential.
  - The biographical sketch has been changed to allow it to be three pages. This is important because, when you submit through Cayuse 424, you are going through grants.gov with that submission, so you should be using the grants.gov as guidance for how to submit the NSF through Cayuse and 424. If it goes directly into NSF, then you use the Fastlane guidance. The new application guide can be found at NSF 21-084.

- If you would like to add something to the agenda, feel free. This is not driven by just ORED offices, it is driven by the group at large. Feel free to contact Karmen if you would like to add an item to the agenda.

- As of yesterday, a new process for requiring J numbers – we now have to provide a W-9 form and ACH form, found on the Purchasing website under the Vendor Information tab, Upload the documents when putting in a request for a new sponsor. Once AP supplies us with a new J number. This process may take a little bit longer that it has in the past. The proposal should not be routed until the sponsor/subcontractor has been added to Cayuse. If it is, the proposal will be reopened and should not be routed again until the sponsor is in the system. Please see attachment on the ROC webpage labeled, "Procedure to Request New Sponsor/Subcontractor to Cayuse System".

- FY20 Annual Report - We are currently working on the report, checking and double checking. We have found some routing issues that are being addressed. There was over $100 million in research awarded this year. The report should be posted on the ORED website by early next week.

Last Scheduled ROC Meeting of the Year:

Wednesday, December 16, 2020 – virtual