



University of Alabama Huntsville

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About This Report

The National Council of University Research Administrators (NCURA) is a national organization of over 7,000 members. NCURA serves its members and advances the field of research administration through education and professional development programs, the sharing of knowledge and experience, and by fostering a professional, collegial, and respected community.

This document focuses on sharing knowledge and experience as a result of the recently conducted review of the research administration area of sponsored programs. Our objectives are to provide the institution with feedback on the institution's management in support of research and to share recommendations and national best practices that might be considered at the institution.

While the review utilizes the NCURA National Standards, the Reviewers recognize that policies and practices vary at institutions and that not all Standards are applicable to each institution.

The NCURA peer review does not evaluate personnel, nor does it perform an audit function. The results of this review, therefore, cannot assure fiscal, regulatory, or ethical compliance with federal, state, or local regulations. The recommendations offered in this review report should not be construed as an exhaustive list as these recommendations necessarily represent an analysis by a particular set of Reviewers and at a single point in time. A decision by an institution not to adopt one or more recommendations does not mean, in any way, that the institution is failing to meet legal requirements. Rather, the recommendations reflect an opinion by nationally recognized research administrators who may not be fully cognizant of local history, environment, or decisions. This document does not provide legal advice. NCURA does not warrant that the information discussed in this report is legally sufficient.

- The Executive Summary provides an overview of the report.
- The Current Environment for Sponsored Programs section discusses the many influences and pressures that have recently affected research administration and created some of the current stresses.

The remaining sections provide a detailed discussion of the National Standards as applied to this institution and includes notable practices and recommendations throughout, along with the rationale for each.

NCURA will treat the contents of this report as confidential and will not disclose nor distribute the report outside individuals affiliated with the peer review program. There are no such restrictions on how the institution chooses to utilize the report.



Executive Summary

The National Council of University Research Administrators (NCURA) would like to commend the University of Alabama in Huntsville for undertaking an open and comprehensive review of the research administration infrastructure. The strong support for administrative efficiencies and accountability is evident with the decision of institutional leadership and the community to engage in a process that allows all members to participate and contribute.

The NCURA Peer Review Program is premised on the belief that it is a critical part of this review process to include experienced research administrators with significant careers who have been engaged nationally. This external validation allows University of Alabama in Huntsville to incorporate best practices and models into their final action plans.

An evaluation of the research administration of sponsored programs at the University of Alabama in Huntsville was conducted at the request of Dr. Ray Vaughn, Vice President of Research and Mr. Ray Pinner, Senior Vice President for Finance and Administration . The



evaluation was performed in October 2013 (site visit on Oct. 29-31, 2013; Appendix C for the Charge Letter and Appendix D for the site visit itinerary) by a Peer Review Team from NCURA (Appendix B for Bios).

The National Standards (Appendix A) framed the evaluation for the administration of sponsored project activities. These Standards cover institutional expectations and commitments, policies,

procedures and education, the central and unit-level operations supporting research and scholarship, and the relationship and partnerships across all institutional functions.



The notable practices and recommendations from the review are listed throughout the report. Each notable practice and recommendation includes a description and rationale. Overall, through our review, eight broad themes emerged.

The first topic of interest is organizational structure. During its visit, the Review Team was asked multiple times on our thoughts regarding combining the Office of Sponsored Programs (OSP) and Contracts and Grants Accounting (CGA). We also heard comments, positive as well as hesitant, regarding the possibility. In probing deeper into this suggestion, the Reviewers heard that what was most important to the researchers, faculty, and administrators was a seamless operation.

Universities structure their Pre-Award, Post-Award, and Research Finance offices quite differently. These decisions are based on many factors including institutional philosophies, resources, and history. While there are many advantages to a consolidated research administration unit, a combined office structure on an organization chart offers no greater certainty that the operation will be able to provide effective and transparent customer service. The Reviewers believe that it is more important that UAH act on the recommendations regarding the other themes discussed in this Summary and detailed in the report before taking action on organizational structure.

The second theme is roles and responsibilities. UAH continues to grow and evolve as a research institution. Such growth is commendable, but it does create challenges. It is no longer as easy to operate based on personal relationships or rely on a few individuals who are "jacks-of-all-trades." The Reviewers observed redundancies and duplication of effort created by a lack of authority as well as widespread misunderstanding on who was responsible for certain activities. As the university grows, it will need to specify roles and responsibilities at all levels. Along with this specification, there is a need to train to the role as well as a need to articulate the roles and responsibilities in policy documents.

The third theme is decision-making authorities. In many situations, the Reviewers observed that decision-making is retained at the top-levels of the organization. There are high expectations— in some cases, perfection is the standard. Continued growth and diversification of the UAH research portfolio will place increasing pressures on this model. The institution should consider if it is willing to assign the authority for decisions where the responsibilities lie within the organization.

The fourth theme is communications. Comments were made throughout the Reviewers' visit that individuals felt that they did not have the information necessary to do their job. In many cases, it appeared that the information was available, but it was hard to locate or sent to the wrong individuals. Keeping people informed is challenging for any university. There are particular needs for UAH to provide a consistent delivery method and to target its sponsored project administration communications to a consistent audience.



The fifth theme is policy. There is a current project to gather all policies for review and updating as well as improved dissemination. It was frequently acknowledged that a number of policies were written several years ago and they need to be revisited to reflect the changing regulatory environment. This policy initiative presents an opportunity for UAH to make improvements in its policy writing procedures by becoming more consultative with additional involvement of faculty, stakeholders, and subject matter experts. There is also an opportunity to reduce the siloing of previous and current policies. As part of the policy initiative, it is important in particular that UAH policies are assessed in terms of implications of that policy on other areas within the institution.

The sixth theme is functional training. UAH has provided opportunities for professional development to its OSP and CGA staff. There are needed opportunities, however, in providing specific, consistent training in the functions and operations at the institution. Training needs to extend beyond the central offices to include administrators, faculty, and researchers. There is a need to identify the appropriate materials for the targeted audience.

The seventh theme is local support. The Reviewers heard a recurring message that the faculty felt that the lack of support at the departmental level was leading to their dissatisfaction and disenfranchisement from the research goals of the University. How departments are staffed and funded needs to be considered. There has been progress made in the areas of proposal support that has been received favorably. However, faculty need support and assistance over the life of the project; as such, award management support needs additional attention.

The eighth theme is electronic tools. As UAH grows its portfolio, the usage of electronic tools to provide efficiencies becomes more critical. Effective bridges between OSP and CGA to permit the sharing of information and to reduce duplicate entry of data need to be addressed. In addition, providing data to researchers, faculty, and campus administrators from both OSP's homegrown system and CGA's Banner system should be explored further. Timely access to easy-to-find and easy-to-understand information will facilitate sponsored projects administration for all parties.

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Current Environment for Sponsored Program Operations

Any institution that is focused on developing a more research-intensive program faces a number of challenges. On one front is the challenge to embrace the culture of the institution and those existing or emerging priorities as they relate to sponsored program activities. On the other front is the challenge to build or sustain an infrastructure that can nurture, facilitate, and support the growing demands of a research enterprise and meet both faculty expectations and institutional accountability.

Any research enterprise brings a measure of risk, accountability, and oversight to the institution that has not been previously apparent. These measures are in response to the federal government's increasing attention through escalating policies, regulations, and oversight. This increased involvement of the federal government in sponsored programs oversight has resulted in the need for higher degrees of specialization and education on the part of institutional sponsored programs staff. Institutions now maintain a delicate balancing act between developing the infrastructure for facilitating and moving forward research activities of their faculty and providing sufficient oversight and internal controls to demonstrate accountability and to mitigate risk.

In the last five years, institutions have been especially impacted by the external environment. Reduced funding, increasingly large-scale and multi-disciplinary research, and collaborations with foreign scientists and businesses have all contributed to complex relationships and issues



of ownership. The recent federal attention on institutional operations through audits, whistleblowers, and investigations has not only exposed our institutions to the public but has brought increasing levels of Congressional attention. The resulting attention on how institutions manage their relationships and their use of public funds often results in tighter institutional controls and more restrictive policies imposed on both the institution and faculty.

Many of our institutions are now recognizing that the growth of infrastructure and specialized expertise has not kept pace with the complexity of the current-day research relationships and the attention to government regulations and policies that are inextricably intertwined with the external funding.

Institutions focusing on growing their research will find that external funding is a double-edged sword. Federal awards carry all the rules, regulations, oversight, and accountability regardless of the size of the enterprise. It is critical that an institution have adequate staff, with appropriate training and resources, in place to handle the administrative burden imposed by accepting increased external funding. Mistakes in this area can be damaging to both individual and institutional reputations. In addition, sponsored programs offices are responding to deadlines not of their own making. Decisions and administrative actions must often be undertaken with virtually no advance notice.

The infrastructure supporting sponsored programs is always complex and it requires a periodic review to determine if it efficiently supports the efforts of investigators while also offering an adequate compliance posture with the regulations that underlie federal funding.

This general discussion of the current national environment within which all sponsored programs operations exist and the special challenges for transitioning institutions will serve as a foundation for the more specific discussion of this report.

I. Institutional Commitments

I.A. STANDARD for Institutional and Research Administration Planning.

The institutional priorities and strategic plans as relate to research are clearly articulated and tied to action plans and metrics, defined by research administration, that will support and advance the institutional priorities. Institutional leadership understands the relationship of research strategic goal successes and infrastructure commitments in areas that support research (such as seed or bridge funding, shared cores, release time). An institutional commitment to research and sponsored projects is clearly evident at all levels of the organization as appropriate to the culture, mission, and strategic plans.



The University of Alabama in Huntsville (UAH) is a Ph.D. degree granting university in the State of Alabama that is recognized as a NSF EPSCOR institution and a Carnegie Foundation Research University with Very High Activity.

The UAH research administration infrastructure is led by the Vice President of Research (VPR) and the Vice President for Finance and Administration (VPF&A). Offices reporting up to the Vice Presidents include, but are not limited to the two offices responsible for pre- and post-award administration: OSP-Office of Sponsored Programs (pre-award and non-financial post-award) and CGA-Contract and Grant Accounting (billing and financial reporting). The FY12 total awards were \$90,347,400; with the majority of awards funded by DOD and NASA. The majority of awards were in the form of contracts at a value of \$66,568,389. In the last few years, there have been changes in key leadership positions at the University and some notable situations exist:

- ▲ The President is relatively new.
- ▲ A search is underway for a new Provost.
- ▲ The Vice President for Research has been in place for less than one year.
- A search for a newly created position of Senior Deputy Director to assist the Director of OSP is in progress.
- The CGA office has seen a high rate of staff turnover and many responsibilities have shifted over to the pre-award office.
- A new Research Development Office has just been created.

The UAH Strategic Plan, *Expanding Horizons 2013-2020*, is illustrative of the University's commitment to research and its goal to be recognized nationally and internationally as an institution to which government, industry, and academic leaders turn "for opinions on societal issues, especially those involving technology." The UAH Strategic Plan states that they want to strengthen and maintain a financial, physical and personnel infrastructure that supports continuous quality enhancement and the pursuit of excellence. One of the stated priorities is to broaden and expand the research portfolio. The Plan states a 2018 objective to: increase total expenditures by one-third; increase by 50% the proportion of expenditures from sources other than DOD and NASA; increase the percentage of expenditures from large, multi-year grants and contracts; and increase the number of nationally and internationally prestigious awards, recognitions and outcomes.

• <u>Notable Practice</u>: The development of a Strategic Plan 2013-2020 is a commendable effort to provide a high-level overview of goals and objectives.



While the Strategic Plan was shared with the campus, a recurring comment across personnel sectors and units was that the operationalization of the Plan was not clearly understood. Nor was it clearly understood how the goals were to be achieved within the current infrastructure and staffing.

As UAH pursues its goals of developing a more diversified and larger research portfolio it will face several challenges as it works towards its goal of 2018. One major challenge is to shift the culture from a DOD and NASA contract centric environment to that of a more balanced mix of grants from other funding sectors including other federal agencies, as well as private and corporate foundations. To do so, UAH will face the challenge of building up its research activity in the Colleges, whereas now it is Research Center centric; and these two environments have minimum interactions. An environment that promotes dialogue and collaboration across colleges and centers will provide an opportunity to leverage talents, resources, and intellectual capacity to increase the portfolio.

> • <u>Recommendation</u>: UAH should provide a vehicle where College Deans and Center Directors can meet monthly to discuss research issues, policies, procedures, opportunities and strategies for engagement. In the past, the Research Council provided such a venue. The Reviewers understood that the Research Council was being resumed, but its membership would include the Center Directors only. The VP for Research should consider expanding the revived Research Council to include College Deans or developing an additional forum for both Deans and Directors. (see also Section II Communications)

UAH will be challenged to re-imagine and sustain an infrastructure that can actively support, encourage, and facilitate an expanding research enterprise in a transparent and efficient way. The proposed growth will put additional demands on the environment and will require an improved clarity of roles and responsibilities, an understanding of accountability, and a commitment to support the education and training of research administration staff, as well as its faculty and researchers. It is important that the institution have adequate staff, with appropriate training and resources, in place to handle the administrative burden imposed by accepting and managing external funding.

The pre- and post-award office (OSP) and the billing and financial reporting office (CGA) have separate VP reporting lines. The Reviewers heard from many people across sectors that they believe if the offices were combined, there would be better service. It is the opinion of the Reviewers that it is important the two offices resolve the current disconnect in communication and clarify their roles and responsibilities. It appears that duties from CGA were assumed by OSP post-award in 2007 during a Huron Consulting review of CGA due to staffing issues. These duties have never been returned to CGA due to chronic understaffing and turnover.



OSP has a homegrown system that does not feed into Banner and they would like to have direct access to Banner. On average, OSP needs 72 hours to do their work so it could take up to two weeks in total to set up an account. CGA is still a paper-based operation and needs 24-48 hours to set up the award. Faculty are frustrated with this turn around and the lack of ability to know where their paperwork is in the system. They indicated it was difficult to manage their awards and to be able to access reports. Faculty who had multiple awards were particularly challenged by the current process.

Furthermore, OSP approves purchase requisitions and travel expenditures verification – responsibilities assumed from CGA with the understanding that CGA would resume the duties when they became fully staffed. That was three years ago and it has not yet been resolved. It appears the issue is not because CGA is recalcitrant. Rather, CGA's current workload at its current staffing levels is not reasonable.

UAH has stated an interest in increasing its large and complex proposal efforts and a desire to pursue projects that will involve complex collaborations to meet this goal. This will bring additional demands on the staff, as well as the researcher or faculty member, to manage the funds and to provide good stewardship in the growing climate of increasing rules, regulations, oversight, and accountability. It becomes essential that pre-and post-award and research finance offices be adequately staffed with well-prepared, knowledgeable staff and managers who operate in an environment of clear roles and responsibilities, open communication, and replete with the business tools to execute their daily tasks in a timely and efficient manner. While the faculty and researchers have an appreciation of the workload demands of these staff, there appeared to be a level of frustration with timeliness, consistency of answers, and access to information.

UAH currently places a Contracts and Grants Coordinator in the Colleges to provide pre-and post-award support for investigators. Both the College of Engineering and College of Science each have a full-time Coordinator paid by OSP. The schools of Business, Nursing, and Liberal Arts share one Coordinator who resides in OSP and rotates during the afternoons between the three schools. While such College-level positions are funded centrally, the Centers' budget analyst positions are funded through investments by the Centers from their portion of F&A return. In general, the Reviewers heard positive comments about both the College-based coordinators and the Center-based budget analysts. The general feeling was that OSP was providing them with good service and that CGA was more focused on compliance and "policing" than service. There was a thematic frustration voiced regarding post-award service and exacerbated by confusion about roles.

It should be noted that CGA is shouldering their work load and responsibilities while balancing a climate of ongoing staff turnover, insufficient staffing and a work environment with less than optimum systems due to such things as a disconnect



between OSP IT databases and Banner. This situation is beyond the control of the staff but could and should be ultimately addressed by management.

The sponsored research infrastructure is dynamic, changing, and complex thereby benefiting by periodic reviews and assessment to insure that it supports the efforts of the principal investigators while concurrently providing the requisite compliance to be responsive to the demands of the funding regulations. This environment ubiquitously affects all sponsored programs but also helps guide institutions in making decisions regarding institutional infrastructure for a robust research enterprise, pre- and post-award functions, project integrity, staffing, communication, and educational programs.

The Reviewers observed a strong and long history dedicated to the research enterprise. People were well aware of the history of the institution and its commitment to research - this extended to staff, faculty, and researchers. However, how that commitment translates into actually supporting the efforts seamlessly, efficiently and timely was less clear. While the research goals and expectations for sponsored research are communicated to the institution's stakeholders via the Office of Sponsored Programs (OSP) Research Quarterly, New Faculty Orientation, email, the VPR, Center Director Meetings, and various other vehicles there seemed to be some confusion about getting the message out consistently. In order for UAH to meet its goals for increasing and diversifying its portfolio and for having a seamless process to support this goal, communication must be accessible, transparent, and consistent. The University's commitment to research is indicated in the Strategic Plan that addresses growth and diversification in research volume as a priority for UAH. It can be a seminal document that can be leveraged to enhance transparency and inclusiveness as UAH forges its future directions and place in the State of Alabama's research arena (see discussion in Section II Communications).

• <u>Recommendation</u>: University leadership needs to construct a communications plan with goals and clearly articulated priorities to reach and engage University researchers and the staff who support them. This could be jump started with a Town Hall meeting about the steps being taken and considered for the Strategic Plan.

The Vice President for Research provides internal seed funding that is intended to facilitate interdisciplinary interactions among faculty from more than one College around common themes; research infrastructure funds for equipment purchases, minor remodeling, software and other infrastructure improvement; new tenure track faculty seed money, bridge funding. Faculty seemed well informed and pleased with this support, especially since the funding cap increased. OSP distributes direct emails regarding seed monies and posts the guidelines to the website. However, some Centers felt it was insufficient and did not encourage their researchers to pursue this avenue.



Depending on the college, faculty incentives and course buy-outs were also offered through the Colleges' portion of the F&A return. These are not standardized across the University. In some instances, Deans retain all the F&A, thereby being perceived as not incentivizing research adequately. The faculty buy-out process was based on an old Presidential memo that allocated 20% of an appointment to research. It appears that colleges have different interpretations of how to calculate how much a course buy-out costs. There have been difficulties in instituting change. For example in some colleges, the Dean retains the buy-out monies thereby not taking advantage of opportunities to incentivize the departments. Nevertheless, change is slowly occurring.

- <u>Recommendation</u>: The VPR should discuss the seed funding with the Center Directors to determine how best to meet the Center needs. Strategies should be considered to incentivize projects that specifically engage Colleges with Centers on projects. Many of the research centers have a successful record of accomplishment of obtaining research funding, primarily through DOD and NASA. This success is commendable, but it also presents risks going forward due to shifting federal budget priorities. As part of UAH's strategic goals, the use of seed funding to encourage collaborations across centers and colleges can lead to diversifying the sponsored funding portfolio within the research centers.
- <u>Recommendation</u>: The VPR should consider targeting seed monies in strategic topical areas that could provide new avenues of funding. There could be set asides for non-DOD/NASA type projects and available to faculty in colleges as well as researchers in centers. Alternatively, a funding competition could be set aside for a new pool of applicants either new faculty, faculty new to research, or researchers.
- <u>Recommendation</u>: University leadership should assemble a working group to examine F&A distribution and buy-out incentives for faculty to align with the goal of growing the research portfolio.

The Reviewers understand that the Schools of Business and Nursing have an Associate Dean with research responsibilities. Many research universities have moved in this direction to further strengthen the research priorities of the school/college, as well as serve as a resource to facilitate and support these activities. This requires a faculty member who has been or is an active researcher and is aware of the impediments and needs of faculty in conducting research. As UAH, desires to increase activities in the Schools/Colleges this might be a strategy to consider.

• <u>Recommendation</u>: The VPR and the Deans should discuss the value of having Associate Deans for Research within all the schools/colleges.



UAH has embarked on a bold goal of growth and diversification. In 2005 and 2008, two major surveys were undertaken that led to a comprehensive strategic planning process in January 2012. As in any such effort, many details can support the success of the effort or if left unmonitored could contribute to impediments and roadblocks. The strategic plan will require careful monitoring to determine if UAH is on target over the seven-year horizon (2013-2020). It also presents an opportunity for faculty and staff engagement. The current NCURA Peer Review represents the first official review of effectiveness that UAH has conducted. At many institutions, there is increasing attention on critical administrative operations and the need for a regularly occurring review cycle, as is found in academic program reviews to maintain academic accreditation. While the form for such review can be varied (internal or external), the process establishes an expectation for attention to the operational effectiveness, how well that operation succeeds in a fluid environment, and a venue for faculty to comment on process.

There are a number of techniques used by institutions to review periodically the effectiveness of administrative operations, to assess processes for areas of improvement and currency, and to review for compliance or risk.

• <u>Recommendation</u>: UAH should consider establishing a regular review cycle for the research administration functions and oversight areas. Scheduled reviews assure the stated strategic priorities and objectives are on target and identify areas for corrective action.

The Charger.net, under the Research portal link, can be accessed for sponsored research financial reports and the quarterly Research Dashboard. The reports provide a high-level overview of activity by college/center including proposals submitted, awards received, and expenditures. Year-to-date award information shows that engineering accounts for 3%, mathematics and computer sciences 22%, and physical sciences 17%. The other fields (life sciences, social, behavioral, and other) comprise the balance of activity. As UAH proceeds with plans for diversification, it should consider its need to support and nurture these other fields.

• <u>Notable Practice</u>: The Office of Institutional Research publishes an annual Fact Book that includes data about administration, faculty and staff, students, academic programs, financial and physical resources and research. The OSP publishes Research Center Performance Data Report that includes performance metrics for publications, expenditures, and indirect cost recovery (ICR).

I.B. STANDARD for Research Administration Organization.



The institution has identified offices and structures that support the overall administration of the research enterprise and, in particular, the management of externally sponsored programs. The institution has defined roles, relationships, and authority between offices where institutional functions in different arms of the institution may overlap with research administration. Effective operational processes exist between sponsored program activities and business functions. As appropriate to the organizational structure, senior research leadership is represented in key academic and institutional groups. Where sufficient research volume and activity warrant, the institution has addressed school, college, department, or center needs for the research administration infrastructure that resides in those units.

The UAH has seen recent changes in leadership with a new President, a new Vice President for Research, and a new Vice President for Advancement, and an anticipated hire of a new Provost. The senior research official has a visible role on key committees and sits on the Executive Committee, UAH Foundation Board, Provost and Executive Vice President Search Committee (Chair); Environmental & Health Safety Committee; Risk Management, and Compliance. This gives a high level of engagement and visibility for research. At this top level, it appears that roles and responsibilities are understood. The VPR and the Vice President for Finance and Administration meet regularly and have a joint awareness that their respective offices (OSP and CGA) have needs to be addressed to improve and enhance their services including staffing, training, and streamlining business practices. A conversation and assessment of whether or not those offices should be combined lies in the future.

The lines of communication and coordination of duties are less clear amongst OSP and CGA staff functions. This condition is recognized at the VP-level and the need for remediation is one of their goals. This lack of clarity has affected the faculty and researchers who have expressed confusion and frustration about who to talk to regarding issues, especially those concerning post-award issues and financial questions. In addition, there appears to be a strategy for informal communications that bypasses the staff and allows faculty and researchers to go directly to the Director level or above for resolution of issues or answers. This undermines the authority of the administrators, the associate directors or in some cases the Director. While it is understood that informal communication occurs, the roles and responsibilities of the OSP and CGA staff should be clearly communicated to all individuals and appropriate lines of communication should then be encouraged.

• <u>Recommendation</u>: The AVPs and the Directors of OSP and CGA should hold regular meetings to recommend roles and responsibilities, solutions, and optimum infrastructure. UAH is now at a juncture of expanding and diversifying its research portfolio, which makes this an opportune time for a series of high-level conversations on these areas

Overall, the stakeholders have a high degree of confidence in the Director of OSP and she is very accessible to them. The coordination of functions between OSP and CGA



is managed at the director level through ongoing communications though there is a lack of routinized formal meeting time between the office staff. Since the two offices are located in separate buildings, there is a lack of opportunities for informal, impromptu face-to-face meetings and conversations as well.

In addition to central office staff, OSP has placed three Contract and Grant Coordinators in campus units. These individuals are responsible for both pre-award and post-award duties. It was not clear how much post-award activity was actually being handled by these embedded positions.

• <u>Recommendation</u>: The OSP Director needs to clarify the responsibilities of the Contract and Grant Coordinators to the faculty and campus administrators. While there was appreciation from the campus for the additional administrative support from these staff, it was not clear to many that the work performed was intended to extend beyond proposal preparation and submission. In some cases, that may be because the faculty was most interested in receiving assistance in those areas. Post-award management is a critical function that, while not always popular, provides beneficial support of the research enterprise.

In general, the unit level responsibilities, be it Center or College are understood. The lines of communication are formalized between the College Coordinator and OSP or the Center Budget Analyst and OSP. The faculty, Deans and Directors appear appreciative of the staff efforts in this regard. The College Coordinators are part of the OSP and are embedded in the College, whereas the Budget Analysts are part of the Center(s).

If UAH is committed to growing its research portfolio it is necessary to have fully operationalized units with frequent and transparent communication. It is necessary to address and resolve several issues: adequate staffing levels, competitive salary scales, reduction of turnover, and clear duties and responsibilities. These work conditions will be necessary regardless of whether the offices remain independent, combined, or with dual reports. Only after these core issues are addressed should a discussion follow to determine if OSP and CGA should combine, co-locate, or remain in their current reporting lines. The Reviewers heard many comments throughout the visit from staff, faculty, and researchers that advocated for combining pre- and post-award. However, the Reviewers are of the opinion that a careful and in-depth review of the staffing, the workflow, and the redundancies be undertaken prior to making any final decisions regarding reorganization.

Operational relationships among institutional functions such as human resources, information technology, financial management, and non-financial compliance functions and development exist. However, these relationships are aggravated by computer



system functionality. The Office of Information Technology (OIT) supports CGA whereas the OSP has its own dedicated IT staff and its own homegrown electronic research administration (ERA) system. A common comment to the Reviewers was the frustration over the inability for the OSP ERA system to integrate with the financial system (Banner). There have been several attempts between the OSP IT Manager (Senior Information Systems Specialist) and the OIT to find a way to address this need. It appears that it does not successfully move up the campus priority list for implementation.

Typically, at most universities, the Office of the VPR is responsible for the research integrity functions. However, research integrity functions at UAH are vested with the General Counsel who serves as the acting Compliance Officer. The former Compliance Officer position was funded by stimulus monies that have lapsed.

• <u>Recommendation</u>: UAH should consider creating an Office of Research Compliance, reporting to the Office of the Vice President for Research. This office could oversee institutional compliance with such areas as conflict of interest, effort certification, use of humans and animals in research, export compliance, and education. The head of this office would become the Institutional Official. The purpose of this office would be to oversee these risk areas and work with the various, affected institutional offices to ensure coordinated campus compliance.

The newly created Proposal Development Office (PDO), which reports directly to the VPR, will be staffed by reassigning the current OSP grant writer and hiring another person who will manage the database and create templates. They will monitor funding opportunities, get things prepared for OSP approval, provide some assistance to smaller grants on a case-by-case basis, and provide technical writing and editing assistance. It is in the early stages so few details have been worked out yet.

The office's objectives are to increase expenditures by 50% from other sources and increase expenditures from large, multi-year grants and contracts. It also is expected to streamline proposal preparation and submission, and coordinate the proposal process for large, long-term, and/or multi-institutional opportunities. In addition, PDO should formalize a network strategy plan for the PI to connect with individuals who represent potential funding. Lastly, PDO will sponsor the on-campus Research Expo to bring sponsors and PIs together.

- <u>Recommendation</u>: Directors of OSP and PDO need to assure alignment with proposal submission and approvals and publish guidelines to assure that faculty and staff understands the process and roles and responsibilities.
- <u>Recommendation</u>: The Offices of PDO, OSP, and CGA, including the IT



staff, should schedule regular monthly meetings to identity issues, needs, and solutions.

• <u>Recommendation</u>: PDO should establish and maintain working relationships with Deans and Center Directors to identify and communicate large proposal opportunities.

The Marketing & Communication arm of the Development Office has a dedicated staff person to generate research stories, while the AVP troubleshoots and works with the President's Chief of Staff to address problems. The AVP attends the VPR weekly staff meeting and maintains working relations with the Centers. OSP helps vet stories and the VPR shares lists of areas of strategic interest (see Section II Communications).

The Development arm has a separate Foundation that began as a real estate foundation and in the last three years has evolved into a fundraising arm. The AVP of Development becomes involved in conversations with the President, the Provost, the VPR, and the VP Finance & Administration concerning issues around gift or grant determination. They also can receive designated research funds that the PI can directly draw from but there is no procedure in place to flag required approvals for such issues as IAUCUC, IRB, and/or Export Control. In addition to the aforementioned research funds, there are situations where private or corporate foundations have grant programs that require the UAH Foundation or Development Office to submit the proposal for the Institution (e.g. Keck, Robert Wood Johnson, and Ford). Upon receipt of such a grant, there are reporting and administrative requirements that require a seamless coordination of proposal processing and management. Furthermore, the development function has limited staffing with limited private and/or corporate foundation activity in the past as their primary concentration was emphasizing naming opportunities. While they can provide limited assistance with the identification of funding opportunities and proposal development there are no clear linkages, nor policies, with OSP and CGA, nor the recently formed Proposal Development Office.

> • <u>Recommendation</u>: The AVP for Development, Director of Proposal Development Office, Director of OSP and Director of CGA should convene a meeting to discuss the creation of workflow standards and necessary policies to process proposals, submit proposals and manage awards to ensure an efficient hand over between offices. This guidance should then be clearly communicated to UAH stakeholders.

I.C. STANDARD for Research Administration Staffing.

The institution has invested in sufficient number of staff to support the core functions of the sponsored programs operation and to meet the obligations to sponsors. The institution has an appropriate research administration staffing plan that contains elements of recruitment, retention, and succession



for key positions. Clear expectations exist for training appropriate to responsibilities for all level of staff and at central and unit levels.

The Director of the Office of Sponsored Programs currently has two direct reports: an Associate Director and a Senior Information Systems Specialist. A search is in process to bring a Deputy Director on board to address current needs. In general, the OSP appears adequately staffed although the assumption of some financial post-award duties, in 2007, diminishes the staff's concentration on pre-award and non-financial post-award issues. The Associate Director has 16 staff positions (7 of which are direct reports), including 12 contract and grant administrative staff, 3 staff dedicated to subcontracts and one to government property administration OSP also has a three-person IT unit that provides dedicated support to OSP staff. The OSP contract specialists, administrators and coordinators are classified as FLSA-exempt, as is the grant writer, and the subcontract metric analyst. The OSP staff has been in their positions with a range of a few months to 8 years (the Director).

In contrast, the Contracts & Grant Accounting Office has a Director, a Manager, 4 accountants plus an accounting technician. The CGA accountant positions are all classified as FLSA-exempt. The CGA staff has been in their positions for a relatively short period, less than one year, with the exception of their Director who was has been there for approximately 3 years. This disparity in staff size between OSP and CGA appears unbalanced given the size of the research portfolio and the institution's goal to expand. The staffing level of CGA contributed to the original decision to move several financial post-award functions to the pre-award office. At CGA's current staffing, the Review Team believes it is not tenable for that unit to resume all of their prior roles and responsibilities. The shifting of duties has created confusion among the faculty and researchers as to who is responsible for post-award activities. Furthermore, there are instances when an OSP decision is overturned by CGA, which creates further confusion and discontent. It also casts the CGA staff in the role of naysayer.

Since CGA is so thinly staffed, any staff departure becomes burdensome and can contribute to risk. Staff cannot provide the ongoing review and oversight in a timely fashion nor necessarily at the optimum level.

There was a general feeling among management that CGA salaries were not competitive and contributed to the loss of staff. It was mentioned that CGA is the training ground for accountants who are hired away to either the Research Park or other UAH units. In addition to the salary issues, there is a perception that the current work environment is "grinding" and with minimal opportunity for growth. While there is a positive benefit to having trained personnel from the central office move into the units, the disruption in services at the central level needs to be addressed.

• <u>Recommendation</u>: CGA and VPF&A should review the roles and responsibilities, the career ladder opportunities and articulate a plan for



workflow improvement. Subsequent meetings between VPR and VPF&A should occur to assess further the roles and responsibilities as well as the organization.

 <u>Recommendation</u>: A market review of salaries in OSP and CGA should be undertaken by UAH, comparing salary levels to the Research Park and even to other UAH units. Much of the turnover in CGA is the result of recruitment to higher paying jobs, even within other UAH units. A more competitive salary structure in both OSP and CGA would increase retention of qualified and experienced staff, and would increase efficiency of these units and long-term success of these units.

Both pre- and post-award staff have good access to their Directors. However, the lines of authority and the communication with the Associate Director or Manager seem to not be fully utilized or articulated. In the case of faculty, it also appears that they often go directly to the top for answers and do not fully utilize the resources and expertise of the line staff. There does seem to be adequate understanding among the faculty that central administration can and does communicate with the sponsor on their behalf.

OSP IT staff support was described as being the potential "single point of failure" due to the reliance on the Senior Information Systems Specialist and the homegrown database and system that supports their enterprise. The Specialist recognizes this situation; but feels that someone could get up to speed if necessary in his absence. The IT Specialist remains available even when he goes on vacation. IT provides desktop support to all OSP staff and builds requested queries. UAH end users would like to be able to build custom reports and as such would need requisite training (see also Section VI: Information Management). When the system goes down, users bypass the situation sometimes without all approvals and route by paper. A system outage is communicated on a case-by-case need-to-know basis, as there is no systemic alert system. The OSP system is backed up manually on an uneven schedule.

I.D. STANDARD for Research Administration Resources.

The institution has in place a process to identify changing resource needs for research administration as relates to changes in the institutional priorities and the external environment. Such resources encompass staffing, space, information technology, and financial resources to support the staff in carrying out their sponsor program functions.

The current IT environment for the research enterprise is precarious because it relies heavily on one individual and there appears to be no cross training or personnel backup in the event of failure. In a time sensitive, deadline driven environment this exposes the institution to undue potential risk



It is understood that the technology needs will need to be budgeted and might require additional staff. If OSP IT is also to serve the needs of the CGA, this will need to be considered. The Reviewers noted that the staffing issues seemed focused in CGA and not in OSP and that budget resources were identified as one of the impediments. UAH has stated that growth of the portfolio is a primary goal and as such, UAH will need to provide adequate staffing and their support for the IT needs of both units to assure success in achieving these goals, as well as assure ongoing meetings between OSP, CGA, and the IT staff. (See Section VI: Information Management for a full discussion).

Determining the size and location of office space is an important consideration as UAH continues to grow its research portfolio. OSP currently resides in a building with the VPR Office. The CGA Office is housed in a separate building that provides challenges for communication and informal meetings and conversation. OSP has a student courier who delivers mail and documents twice a day between the offices.

The newly established Research Development Office, an outgrowth of the Strategic Plan, will be receiving expanded space in a building separate from OSP. It will be 2,000 square feet; open office environment, meeting room, and office space for visitors

• <u>Recommendation</u>: The VP for Research and the VP for Finance and Administration should consider options for co-locating the offices of OSP, PDO, and CGA. Physical proximity of these units would provide efficiencies and increased communication opportunities that will facilitate the activities of each office.

II. Institutional Communications

II. STANDARD for Institutional Communications.

The institution recognizes the importance of establishing mechanisms for timely, regular communication regarding sponsored programs trends and activity levels, policies and procedures, expectations, roles and responsibilities, changes in policies, and risk areas. Appropriate lines of communication exist between the institution's senior research administrator and the institution's overall senior leadership team. The institution has defined mechanisms that make available information about research activities and successes to the public.

Research administration provides regular communication to faculty and staff as well as opportunities to provide feedback. Current policies and procedures are readily accessible via websites and other means. Strong communications exist between central offices and unit-level staff, where such exists.

Research administration periodically assesses the effectiveness of their communication practices.

There is a need for enhanced and consistent communications across campus. A common observation across all the groups was a need for more timely and accurate communications. The Review Team recognizes that communication has been



impacted by the changeover in several key areas. This has affected UAH at all levels including leadership, faculty, and staff. Especially in the current environmental goal of expanding and diversifying its research portfolio, it is critical to engage with all sectors and levels of the research enterprise. It was apparent that regularly scheduled group meetings were not occurring though in some cases there have been efforts to revive committees and meetings. The senior administrators receive monthly financial reports; have access to the Research Dashboard, and the President, Deans and Vice Presidents meet monthly. The Deans and Directors report that they do not attend regular advisory or committee meetings.

The Research Council reports to the Vice President for Research and formerly included the Deans and Center Directors. The meetings were irregularly attended and not regularly scheduled. It is in the process of being renewed but only including the Center Directors. People commented that it would be useful to reconvene.

This Council could provide a venue for critical dialogue to provide information and updates regarding research activities and initiatives, emerging opportunities, and the environment to foster large and complex proposals as well as inter-disciplinary research efforts. Absent these ongoing conversations between UAH leaders, there is a lapse in information sharing, collaborations, policy review, and development that are essential for the institution's goal of growth and diversity and the overall voracity of the institution's research climate. They noted that they do not have input to policy discussions or development.

- <u>Recommendation</u>: THE VPR should convene a series of Town Hall meetings around campus to hear and engage leadership, faculty, and staff about their research needs and ideas for meeting the goals of the strategic plan.
- <u>Recommendation</u>: OSP Director should continue to assemble an internal Research Administrator Network that meets monthly to remain up-to-date on UAH and sponsor policies, procedures and processes and serve as an environment to discuss issues and concerns.

OSP and CGA need to enhance and solidify their relationships across campus and with other campus research administrators, including center budget analysts, coordinators, and center staff. Central office staff as well as center and department administrators spoke about their time constraints and their inability to spend more time in meetings especially if the meetings do not address their current needs. Yet they uniformly wanted better communication and more training. Regular meetings between pre- and post-award and the unit-level staff could ameliorate some of the lack of communication.

• <u>Recommendation</u>: The Directors of OSP and CGA should consult with central staff and College, Center and departmental research administrators



(including OSP placed staff in the colleges) to determine an effective method for networking and information exchange. Since training is of great interest, these meetings could be used to share information and expertise to enhance staff professional development. They could also launch a series of focus groups to engage staff and invite input into operationalizing the strategic plan.

- <u>Recommendation</u>: The VPR and VPF&A should investigate establishing an advisory committee of key research administrators and faculty and researchers to meet regularly with the leadership of OSP and CGA. The goal is to identify strategies for engagement with the strategic plan, to identify training needs, to suggest ways to improve service, and to share ideas that will invigorate and support the research enterprise.
- <u>Notable Practice</u>: OSP issues a brief survey document to the PI for each proposal submitted through OSP to ascertain the PI's satisfaction with the proposal submission process. The results of each survey are discussed with those individuals within OSP involved in the particular proposal submission. Generally, surveys of this nature tend to be completed when there is dissatisfaction with the provided services. That has been the experience at UAH as well. Nevertheless, the information is useful in assessing the overall process and identifying bottlenecks or areas of misunderstanding.

CGA does not use a survey form. The complaints and dissatisfaction are left to informal conversations or in the case of greater severity, discussions elevated to the level of Director or VP. In some cases, the root of the complaints are tied directly to lack of communication and transparency and would be alleviated by a clarification of roles and responsibilities, more timely access to information, and an opportunity for meaningful engagement.

 <u>Recommendation</u>: CGA and OSP should collaborate on content and employ a rapid online survey tool (e.g. Doodle or Survey Monkey) to identify both faculty and staff needs and opinions about improving the communication of research related information beyond proposal submission (e.g. policies, procedures, funding, updates). Information could then be used to focus Town Hall meetings.

Faculty and researchers expressed a frustration with being treated as if they were being policed and that central support sometimes felt like obstructive oversight. They also recognized the demands put on staff and the pressures of compliance. However, it is important to realize that the message can be delivered in several ways and central staff must be sensitive to the tone of communication and be able to employ appropriate communication techniques, whether face-to-face, verbal, or written, that will forge a



partnership of respect and collegiality. Changing perceptions will require investment in education about customer service and an accompanying commitment to creating a customer service environment.

• <u>Recommendation</u>: OSP and CGA should provide communication workshops for staff to expand and enhance their skills and provide training to diffuse conflict situations to achieve positive outcomes.

UAH AVP Marketing & Communication has primary responsibility for publicizing research activities and successes. They receive story leads from the VPR as well as the OSP Director. In the current environment of projected growth, it is important to pursue all avenues to make the UAH research story successful. An established method to share this information on a regular basis could expedite this process. OSP has direct and early knowledge of what areas of research are being pursued by UAH faculty and researchers. A regular feed of information to the AVP could support this goal.

- <u>Recommendation</u>: OSP should provide the AVP for Marketing & Communication a monthly proposal and award list so that his staff could directly engage faculty and highlight their efforts through a variety of vehicles.
- <u>Recommendation</u>: UAH should evaluate the impact of a research magazine as a method to highlight UAH efforts, consider exploring strategic themes that align with the plans for research portfolio growth and diversification.

III. Research Administration Policy Development

III. STANDARD for Research Administration Policy Development.

The institution demonstrates a process for policy development that is transparent; for those policies not proscribed externally (such as by specific federal regulation). Policy ownership and the associated approval process are clearly established.

Where sufficient research volume and activity warrant unit-level research administration support, the institution has established the relationship of central policy to college, department, or center policy and practice.

UAH has policies in place that address sponsored projects administration. However, many of these policies were written several years ago and were disseminated using various distribution methods. Some policies were distributed on paper while others were distributed via email or electronic newsletters. The inconsistent delivery methods



have made it difficult for faculty, researchers, and administrative staff both on campus and in the central offices to stay current on research policy. UAH has recognized the need to assess policies and is currently gathering its policies for review and update.

Policies should utilize a standardized layout including the date and should be located in an easy to find location on the website. As policies are updated and released, consider developing a standardized distribution list—additional notifications and distribution mechanisms may be beneficial in some circumstances, but should always reference back to the official repository. Policies should contain roles and responsibilities of the key parties: generally PI, department administrators, OSP/CGA. These roles and responsibilities define the extent of the individual's participation in implementing and enforcing policy.

- <u>Recommendation</u>: The VP for Research and the VP for Finance and Administration should explore mechanisms for consistent formatting and distribution of policies.
- <u>Recommendation</u>: The VPR should designate a single point of contact that will be responsible for maintaining the UAH policy manual and its accessibility. Once policies are updated and released, they need to be maintained in an easy-to-find manner and location. For policies related to sponsored projects, an individual in OSP should be assigned the tasks of reviewing and maintaining policies. These tasks should include refreshing content such as contact names, email addresses, phone numbers, title changes, etc.

Sponsored program administrative policies need to incorporate a number of different perspectives: those of the PI who is primarily concerned with the project's scope of work, those of the administrators who are primarily concerned with compliance with the sponsor's requirements, and those of the sponsor who are concerned with stewardship of their resources. In setting institutional policy, it is important to provide stakeholders with an opportunity for comment on draft policies. Faculty and administrators should be able to meet and discuss draft policies before implementation.

• <u>Recommendation</u>: UAH should consider the establishment of a policy advisory committee comprised of faculty, researchers and sponsored programs administrators. An advisory committee adds their expertise and perspectives to proposed policies. As UAH broadens its research portfolio, it will become increasingly important to consider the implications on diverse research activities and constituencies. An advisory committee also can assist in the prioritization of updating the existing policies. With many policies written by previous administrations, there will be a need to determine which issues need to be addressed sooner than later. Soliciting opinions from PIs and administrators



will assist in this prioritization and increase buy-in for new policy rollouts.

Research programs are impacted by a broad set of policies—some of which are issued by sponsored programs administration; but also, many that are issued by other areas of the institution such as finance, human resources, and facilities. It is important to consider the impact of policy changes on the research enterprise. The "siloing" of policy development and implementation can lead to unintended disruptions on research and research administration.

> • <u>Recommendation</u>: The Vice President of Research and the Vice President of Finance and Administration should consider joint review and issuance of policies. Because of the close connections between research and finance and administration, it is beneficial for both units to work closely together to assess the impacts of any new policies on their respective operations. Internal discussions and vetting before issuing new policy can lead to a better understanding of how the policy will affect operations. It also provides an opportunity to build internal buy-in and training for the central office staff. Issuance of policy under the joint direction of research and finance and administration also conveys a clear message to PIs and campus administrators of the direction of the campus.

IV. Program of Education About Sponsored Programs

IV. STANDARD for the Program of Education About Sponsored Programs.

The institution has established programs of education for staff, teaching and research faculty, postdoctoral fellows, and graduate and undergraduate students, as appropriate, regarding institutional and sponsor expectations for the conduct of sponsored programs and research. The institution has on-going educational programs for unit-level (department, college, center, other) research administrators where such exist.

Research administration recognizes the importance of introducing new faculty, staff, senior administrators, and unit-level research administrators to appropriate research resources and information. Mechanisms are in place to identify such individuals.

The need for ongoing education, both training and professional development, is critical for staff, both central and in the units, to remain current in an ever changing and dynamic climate of sponsored research. To maintain a robust and informed environment, where staff are empowered by knowledge and are trained and committed to providing service requires education in the specificities of rules, regulations and



procedures, which is delivered both vertically and horizontally within UAH. Common and standardized knowledge will reduce frustration on the part of both the staff and the faculty. The need for ongoing and pertinent professional development to convert the environment to one of service centric, which is not at the expense of oversight, will also give staff the tools to do their jobs for the faculty and not in an adversarial stance.

Staff are eager for more training to stay current in their jobs as well as to support their professional development. The central staff appear, especially OSP, to have opportunities to attend national and regional professional association conferences such as NCURA, SRA, and CBMI. Individuals are designated to attend to keep current with the profession. Such professional development is beneficial in providing updates and broader perspectives. Center level staff seem to have less opportunity to do so, however it was mentioned that since 2011, the Vice President for Research provides some financial support for center and departmental staff as well as the Dean and Center Directors to attend conferences .

- <u>Recommendation</u>: All new staff in OSP and CGA should be scheduled to attend external basic training for research administration (such as NCURA Fundamentals, or the NCURA Sponsored Projects Administration II workshops) so that they are well grounded in the standards of the profession. Staff that have been on board but would benefit by such training should also be considered. Alternatively, the NCURA programs could be brought to UAH.
- <u>Recommendation</u>: The AVP of Research and the AVP for Finance and Business Services might consider the value for occasionally attending national research administration conferences to stay current with sponsor requirements, effective practices, and appropriate oversight procedures.
- <u>Notable Practice</u>: OSP provides access to professional association annual and regional meetings. Conference attendance support from the VPR was extended to the departments and centers.

Regular internal training and information dissemination meetings are beneficial for the research administrator. The Sponsored Program related workshops and seminars with robust attendance for FY12 included:

- A Banner, RCR
- ▲ NIH Policy Updates
- ▲ NSF OIG
- as well as Dr. Bob Lucas' (consultant) workshops for "Writing the Dissertation" and "Breaking the Barriers to Writing Proposals."



As UAH strives to diversify its portfolio, providing sponsor/agency specific project development and grants workshops might be most welcome especially for junior faculty or first-time principal investigators. These workshops appear to be attended by faculty, staff, and graduate students.

Even with the above-listed education opportunities, a common and recurring request among pre- and post-award staff, as well as staff in the units was to receive more and enhanced training especially on the essential tasks within the institution. Reviewers heard mixed comments about current standing meetings, which appeared to be scheduled at irregular intervals and not necessarily well attended across the board. OSP and CGA had just reinstated a quarterly breakfast meeting, but that is not sufficient for timely training. The non-central staff indicated that they would welcome more interaction and training with central office staff and across departments and centers.

Maintaining a well-informed workforce is further exacerbated by staff turnover both in the central offices and in the departments Currently there appears to be no in-house refresher training available. There is no comprehensive training for new employees. In some cases, there is the opportunity for a new hire to receive hands-on training from a co-worker or to observe a more experienced co-worker performing the expected duties of the job. In addition, while cross training is not explicit, staff is expected to be able to step into different roles. The in-house training on policies, procedures and funding agency updates do not appear to be on a regular schedule and participation seems uneven.

- <u>Recommendation</u>: OSP should create a monthly calendar for a Research Administrators Network to provide mini-ongoing training and update opportunities.
- <u>Recommendation</u>: UAH should assemble a sub-committee with representation from central, colleges, departments, and centers that will be responsible for setting the agenda in response to surveyed staff needs. For example, there were several remarks regarding confusion about UAH travel policies, a targeted session would help reduce frustration.

During the interviews, several OSP staff at all levels remarked on their desire for a consistent level of training and understanding in award negotiation issues. In addition, comments from college and center personnel confirmed that there could be different interpretations of negotiation issues and the allowability of various types of costs. Cost allowability inconsistency between OSP and CGA staff was particularly noted by college and center personnel.

• <u>Recommendation</u>: OSP leadership should consider providing specific and consistent training to OSP staff in the various aspects of award negotiation, compliance, and cost allowability; training should also include



CGA staff. OSP staff are expected to make decisions and give advice in all areas of research compliance. Since CGA can override OSP decisions on various areas of financial compliance, it is doubly important that OSP and CGA staff be on the same page. Providing consistent training to both groups can only enhance the service each provides to campus and to each other. Another area of training is in contract review and negotiation. The General Counsel is interested in providing training that could build skills and expertise in contract review.

• <u>Recommendation</u>: The OSP IT staff should develop an intranet site that could serve as a single repository for training materials for both OSP and CGA. Sharing instructional resources in a common, easy-to-access location would assist both offices in training new staff, providing refresher materials and in cross training.

In general, it is common to find researchers at many if not most institutions, perceiving post-award staff to be too rigid, risk averse, and overly concerned about the rules – this perception appears to be the case at UAH. Whereas there is an inherent tension and conflict between the goals of the PI and the responsibilities of accounting and finance to the institution, there is an opportunity to change the perception and dynamics through better education to achieve their individual goals.

There was a common request for more training that was less generic and tailored to the particular user audience. Specifically faculty wanted to have training that was faculty centric and not through the lens of the accountant or auditor. Currently OSP and the VPR provide information as part of the New Faculty Orientation but faculty deemed this insufficient. The Reviewers suggest this is not optimal to relay information regarding the complexities and services of the research environment and the PI duties and responsibilities.

- <u>Recommendation</u>: OSP and PDO should offer junior faculty "lunch and learn" gatherings that focus on particular areas of proposals (e.g. management plan, needs assessment, budget and budget justification); focused sessions for new faculty and junior faculty opportunities such as NSF Career awards. These one-hour sessions could be offered over the course of the academic year and advertised as a series.
- <u>Recommendation</u>: The VPR should develop and offer a workshop for new as well as junior and senior faculty and researchers that is PI centric. This could also provide a venue to introduce the VPs to the faculty as well as key senior administrators, e.g. directors (OSP, CGA, PDO) and AVPs and build a better communication path, access, and enhance critical relationships. Engaging some seasoned faculty in the orientation would help provide new faculty with



insights.

• <u>Notable Practice</u>: UAH has established programs of education for faculty and researchers and graduate students about institutional and sponsor expectations in the conduct of sponsored programs. This could be expanded and enhanced. Currently sponsored research has a slot to present at New Faculty Orientation, along with compliance.

Amongst the staff, there was a general assessment that they were unaware of staff changes in other units with whom they work; this comment was made independently by both central and college/center staff. Furthermore, people often worked in silo environments and did not have the opportunity to meet their counterparts especially in the departments. This did not seem to be the case among faculty.

• <u>Recommendation</u>: OSP should provide time at the recommended Research Administrators Network meetings to update staff of personnel changes.

The institution has no formalized mechanisms to mentor new faculty or faculty new to research which address regulatory areas related to sponsored research and academic issues such as responsible conduct of research, nor research development issues. Some centers and departments informally mentor their faculty but that is independent of central administration, does not systematically address the aforementioned regulatory areas.

• <u>Recommendation</u>: The VPR and the Deans and Directors should determine how best to develop a mentoring program and provide a mechanism that recruits senior faculty and administrators to formally mentor new faculty (or new to research). Mentoring commitment can be for one or two semesters and include information sessions with sharing of best practices and access to UAH research administration leadership.

V. Assessment and Institutional Preparedness

V.A. STANDARD for Risk Assessment.

The institution periodically assesses risk tolerance of research activities and emerging risk areas. The institution periodically reviews sponsored program policies and performs appropriate audit and assessment activities. There is an expectation for a regular and thorough assessment of the effectiveness of the sponsored programs operation. The institution has mechanisms to monitor the national landscape for emerging areas of risk.



The institution is proud of its background and its successes in its research enterprise. However, it also has led to a climate where protecting the institutional reputation is creating situations where the expectations are perfection. Research is a dynamic activity with many deadlines and expectations. While it would be an ideal state if every proposal, contract, and report were complete and error-free, this expectation can lead to scenarios of over-review and micro-management. Proposals that are partially completed or lacking pieces are not desirable in a competitive research environment; however, the cost to the institution and the PI for achieving 100% accuracy and completion may become prohibitive.

There is a sense that the institution has a hesitancy to move because there may be an error or imperfection. While no one wants to submit consciously or deliberately less than his or her best work, it is important to acknowledge that growth and expansion of the research enterprise is inherently risky. Trying new things, contracting with new agencies, submitting proposals with incomplete information, being questioned or challenged on an expenditure or accounting decision are part of the learning and growing process.

• <u>Recommendation</u>: UAH should consider establishing a risk committee (e.g., Director of OSP, Director of CGA, and Director of Internal Audit) focused on transactional activities to determine guidance to assist staff in setting high, but realistic, standards and better informed decisions. Staff need to be comfortable acknowledging "the grey" and dealing with exceptions.

Currently, the responsibility for compliance and risk assessment is distributed across several different offices:

- Vice President for Research reports to the President of the Huntsville campus and oversees pre-award activities, post-award non-financial, export compliance, technology transfer and the research centers.
 - Office of Sponsored Programs (OSP) reports to the Vice President for Research and is responsible for pre-award activities, as well as nonfinancial post-award transactions. Most information-technology systems supporting the campus research function reside in this office.
 - <u>Research Centers</u> through each of their respective directors, report to the Vice President for Research. These units manage multi-disciplinary research projects independent of the colleges and are responsible for financial compliance of day-to-day transactions.
- Vice President for Finance & Administration reports to the President of the Huntsville campus and oversees all financial business transactions for the campus, other than those managed by the Vice President for Research.



- Office of Environmental Health & Safety has overall responsibility for health and safety compliance at the Huntsville campus, including Biosafety and Radiation Safety.
- Office of Contract and Grant Accounting (CGA) has overall responsibility for financial compliance with sponsored award terms and conditions.
- ▲ <u>Office of Internal Audit</u> reports to the Chancellor of the University of Alabama system, with two auditors located at the Huntsville campus. This office is responsible for reliability and integrity of administrative information; compliance with policies, procedures, plans, and laws; safeguarding of assets; economical and efficient use of resources; and determining whether stated administrative goals are achieved.
- Office of Counsel reports to the Chancellor of the University of Alabama system, with three attorneys at the Huntsville campus. This office oversees risk management for the entire campus and one of these attorneys has the primary assignment of advising in areas of research compliance; he also acts as the Compliance Officer for the Huntsville campus.
- Colleges report to the Provost. Each college possesses some sponsored research in one or more of its constituent departments and is responsible for financial compliance of day-to-day transactions.

Based on a review of institutional policies, the institution's website, and interviews with members of the offices identified above, the institution does possess policies and procedures governing proposal submission, award management, and non-financial compliance. Many of these are robust and the Review Team noted that there was demonstrated support by upper management to ensure that the institution maintained a strong compliance program. Several policies address new requirements or risk areas, and the institution has performed compliance reviews. Representatives from the various offices were knowledgeable in the respective areas and appeared enthusiastic about their responsibilities.

However, as noted in Section III, there are areas where the policies have not been updated or where the policies have been written without full consideration of their impact on the research enterprise. These policies while addressing the risks of a specific issue can cause frustration and unintended consequences in other operational areas.

Although there is no established process to review the overall effectiveness of sponsored research operations periodically, in 2005 OSP assessed its performance, including some functions that would normally fall under the purview of CGA. The Vice President for Research implemented all of the recommendations to some degree.

• <u>Recommendation</u>: The Vice President for Research and the Senior Vice



President for Finance & Administration should consider conducting a comprehensive PI survey covering all research support services, including pre-award, post-award, and associated compliance processes. It has been 8 years since the last survey was conducted and, given that UAH is actively seeking to increase its research-funding portfolio, conducting another survey would provide PIs with a structured method to express their comments. Furthermore, by working with Deans and Center Directors in both developing the survey instrument and in implementing the resulting recommendations, it would help lay the groundwork for other recommendations in this review associated with increased communication and responsiveness to PI concerns.

The Office of Internal Audit performs an annual, organization-wide risk evaluation to assess the risk tolerance of research activities. The process begins in July of each year in anticipation of the upcoming audit period beginning October 1 of that year. The process is based upon management concerns, compliance criteria and the operating environment. A report of audits performed and the status of recommendations are reported quarterly to the Vice Presidents. The Office of Internal Audit is planning to move to a yearlong assessment process to provide more time for evaluation and consultation in establishing the following year's audit plan. Recent audits of research compliance areas include effort-reporting, conflict of interest and cost sharing.

OSP is responsible for the leasing of UAH space to off-campus entities, including establishing rates and negotiation of agreements, with billing for leased space coordinated with Contract and Grant Accounting. Likewise, OSP takes the lead when UAH needs to lease off-campus space for its own use. Agreements for leased spaced (of both types) are reviewed by the Office of Counsel prior to being executed by the Senior Vice President for Finance & Administration.

The Director of Sponsored Programs plays an important role in monitoring new sponsor requirements, external trends in audit and compliance, and risk levels at the national level. Her membership in national organizations such as the Council on Governmental Relations and the National Council for University Research Administrators helps in networking and staying current with new regulations and sponsor requirements, as well as issues and solutions encountered by other major research institutions. She coordinates review of new requirements with the appropriate institutional offices.

A designated member of the Office of Counsel acts as the institutional compliance officer. It is vital that these high-risk areas have ready access to legal counsel, including during their meetings. However, as previously mentioned, the Reviewers feel that the institution might be better served with counsel acting in an advisory manner, separate from the individual(s) designated to have authority in compliance decisions.



V.B. STANDARD for Institutional Preparedness for Research Disasters or Media Exposure.

The institution has a disaster recovery and emergency preparedness plan. Research activities are included in the plan. The institution periodically assesses its preparedness for disasters and insures that appropriate areas are informed. As appropriate to the breadth of activity, the institution has a written and communicated media-response plan.

UAH has defined disaster recovery and emergency procedures for dealing with catastrophic events. These plans include research causes such as biohazard incidents, chemical releases, and radioactive materials releases, as well as the recovery of research activities following a disaster. Also included are plans for communicating procedures to faculty and staff for dealing with catastrophic events. In its emergency management plan the institution has established clear roles and responsibilities, including the requirement to establish a Continuity of Research Plan to ensure continuation of critical research during and after an interruption. However, it does not appear that such a plan exists. In the advance materials provided to the Reviewers, the institution noted that only four of the research centers had developed continuity plans using the ChargerReady continuity-planning tool. It is unknown whether other centers or colleges have established a plan.

- <u>Recommendation</u>: UAH should assess the status of research disaster preparedness and continuity planning for all research centers, colleges and for the central administrative units and committees that support the research enterprise. This will help ensure that UAH is prepared in the event of unexpected interruptions in research activities and minimize the cost of resuming operations.
- <u>Recommendation</u>: UAH should encourage all research centers, colleges and those central administrative units supporting the research enterprise to establish disaster preparedness and continuity plans, preferably utilizing the existing ChargerReady tool. The institution already possesses the electronic tool to allow an individual unit to prepare a plan and all units using the same tool will ensure consistency in format and types of information included, as well as allowing the institution to monitor progress.
- <u>Recommendation</u>: The Office of the Vice President for Research should assess the status of and complete a Continuity of Research Plan as described in the UAH Emergency Management Plan.

The institution also disclosed in its briefing materials that its Environmental Health and Safety Committee (EH&S) (of which the VPR is chair) only recently resumed meeting after several years of inactivity. The resumption of activities is presumably associated



with the hiring of the new Vice President for Research. During the years in which the EH&S Committee was inactive, it is not known whether the constituent safety committees met regularly, or at all.

- <u>Recommendation</u>: The EH&S Committee should establish a regular meeting schedule. A regular meeting schedule will help ensure that this important compliance area has the appropriate oversight and visibility both within the Institution and to the surrounding community. It will also normalize communications between the Committee and its constituent committees.
- <u>Recommendation</u>: As part of its activities, the EH&S Committee should evaluate the disaster readiness and continuity planning of its constituent committees.

UAH has an established plan for responding to unexpected research-related media exposure. This responsibility rests with the Associate Vice President for Advancement in charge of Marketing and Communications, who has implemented a stepped response plan such that successive queries from a member of the press are moved up the leadership chain. In situations where his office learns of media interest in a project or researcher, the office will contact the appropriate individuals in the Center or Department in order to give them advance warning.

VI. Information Management

VI.A. STANDARD for Information Systems Supporting Research Administration.

The institution has in place appropriate information systems for research administration and sponsored programs and has processes that integrate proposals, awards, financial management, and compliance reviews. Appropriate to the volume of activity, the institution has implemented electronic systems that are integrated. The institution periodically assesses research administration technology needs.

The University of Alabama in Huntsville possesses two primary systems that support the research function on campus: Banner for financial transactions managed by the institution's Office of Information Technology (OIT); and a homegrown electronic research administration (ERA) system developed and managed by the Office of Sponsored Programs (OSP). Banner was acquired in 2005 for the campus but the ERA system has been in constant development for around 15 years, changing as necessary to meet campus needs. More specifically the ERA system currently manages the following functions:

Routing of Proposals



- Tracking Proposals
- A Reporting of Proposal status to PIs
- Tracking Awards
- Reporting of Award status to PIs
- Tracking Subawards
- ▲ Tracking Compliance requirements and approvals (e.g., IRB, IACUC, Biosafety)
- Tracking of Travel Approvals
- Tracking of Committed Effort
- ▲ Submission and tracking of IRB protocols
- A Maintaining Award information
- Initiating and Maintaining Banner Account information
- Accounts Receivable (e.g., generating invoices, tracking receivables, aging, etc.)
- Reporting of proposal and award data and statistics to PIs, Deans, Center Directors, and other institutional offices.

The current systems appear to manage successfully processes and the institutional needs of research administration considering institution size, volume, and complexity. While the OSP ERA system does track IRB, IACUC and other compliance approvals, this information is manually entered, as those compliance offices do not possess system-based tracking of such information. Based on comments from a number of interviewees, there is not enough activity in these areas to warrant automated tracking.

• <u>Notable Practice</u>: OSP and its IT staff have demonstrated willingness to take-on IT functions as needed to support the overall research enterprise. Not only that, but they have done so effectively.

There are currently three FTE within the OSP IT group, who completely manage all aspects of the OSP ERA system, including software development and maintenance, website maintenance, system maintenance and desktop support for OSP staff. Desktop support for CGA staff is provided by OIT. In association with the OSP Director, the OSP IT group also evaluates research administration technologies, products, or services to determine those processes and systems that may need modification or improvement.

Based upon comments received by the Review Team, the Director of OSP and the Vice President for Research have provided the necessary resources to support the OSP IT



group. Evaluation of currently employed research administration technologies and identifying the need for changes is performed by the OSP IT group.

A number of interviewees commented that the OSP IT manager, who is the main software and hardware specialist and has experience with the ERA system since its inception, represents a "single point of failure," meaning that if he were to leave UAH or otherwise become unavailable, there would be no one who could step-in to fulfill his responsibilities. The concern is that the institutional research enterprise is now so dependent upon the OSP ERA system, that any failure, either in the system or in those who maintain it could be catastrophic. The OSP IT manager independently acknowledged that this view exists. However, he felt that it was not completely true for two reasons: 1) The ERA system has been developed to allow remote administrative management, which he performs as needed while physically away from campus; and 2) the ERA system has been designed such that any proficient person could take over its management.

Changes to the OSP ERA system seem to be initiated on a somewhat ad hoc and reactive basis, meaning that there appears to be no plan for development of future capabilities: an OSP or campus need is identified and the OSP IT group swings into action in order to solve it. This ability to react and to be flexible is commendable; however, effective planning and making changes proactively is critical for meeting future needs.

Over the years, the group has become the de-facto campus research IT support team but without the recognition or resources, that such a role requires.

> Recommendation: The VP for Research should evaluate OSP IT staffing to • determine whether sufficient resources exist to support future research-IT initiatives; at the very least this evaluation should include ensuring that sufficient expertise exists within the OSP IT group to manage in case the OSP IT manager becomes unavailable. No matter how well designed a system is, it will always require some time for a new person to become familiar enough with it to feel confident in modifying it. Furthermore, the ERA system has become a potentially critical failure point for the entire research enterprise of the institution. Providing resources that allow for testing for failure and operational contingencies is essential. As a case in point, the Friday before the Reviewers arrived, the ERA system went down due to a hardware failure. The system was operational again in two days, with some components up and running earlier than that. According to the OSP IT manager, this was the first unplanned downtime since the inception of the ERA system, which is truly laudable for any IT system. However, for what is now a critical system, there should be sufficient resources available to test and plan for these types of situations, including having clear guidance available for the campus when such a situation occurs.



At present there is only one interface between Banner and the ERA system, which consists of HR information (employee appointment and salary data) used in the proposal budgeting process which is validated against Banner data, but that is only a recent implementation. There is no integrated flow of information from the ERA system into Banner; any information maintained in the ERA system and required by Banner must be hand-keyed into Banner, including sponsored account setup and changes to sponsored accounts. Banner is not used at all for invoicing or tracking of receivables as the receivables module was never implemented. As a result, OSP developed the necessary tools within its ERA system to assist Contract and Grant Accounting (CGA) in accomplishing one of their primary functions: initiating and tracking receivables – a function that would normally be handled by an institution's financial system.

Based upon comments made to the Review Team, Banner appears to have been implemented without consideration of the institution's research enterprise and without input from those most directly involved in research management and oversight. Furthermore, the central IT group that manages Banner was originally unwilling to consider changes to effect integration for fear of increasing the number of customizations on the basis that doing so would complicate maintenance and future upgrades of the Banner software. Understandably, it is desirable to keep software customizations to a minimum in order to control costs and potential conflicts with subsequent updates and upgrades. However, the lack of consideration for supporting the research enterprise is surprising given the institution's goals to bring its research focus to the forefront and the significant portion of total campus financial transactions and revenue represented by sponsored research activity. That being said, the campus has recently hired a new OIT director who has expressed a willingness to implement ERA-Banner integration. Unfortunately, this project has not yet risen high enough within the OIT project plan for the OIT director to allocate resources to it.

Currently, all rekeying of data is managed by CGA, which represents a significant amount of extra effort for the office staff. The two primary areas where integration between the ERA system and Banner would benefit OSP and CGA are with sponsored account setup and with accounts receivables.

One of the most common complaints from all groups of faculty and center/departmental personnel with whom the Review Team met was the amount of time it took from the point at which OSP accepts an award to when CGA creates the account within Banner.

More specifically, with regard to sponsored account setup, all information required for Banner account creation is available within the ERA system. OSP inputs this information since most of the necessary information comes from the award document and from their knowledge of sponsor requirements. This information is then output onto paper, routed to CGA, and manually input into Banner by CGA. CGA also acts as



a second review of the award terms to ensure that the information provided by OSP is correct prior to Banner account creation

With regard to accounts receivable, on a monthly basis OIT generates a report (budget statements) from Banner that are sent for printing by CGA showing the current expenditures of each sponsored award. CGA then enters that information manually into the ERA system, which assigns an invoice number and generates an invoice for each sponsored account. CGA uses the ERA-generated information to bill the sponsor (or drawdown, as appropriate). Funds are received by the Bursar's office who records them into Banner. The Bursar's office sends miscellaneous receipt of funds recorded to CGA who manually keys the information into the ERA system. On a monthly basis, CGA generates a report from the ERA system and manually reconciles the receivables information between Banner and the ERA system; this also constitutes the aging report used by CGA to follow-up on payments due from sponsors.

- Recommendation: The Provost should charge OIT with establishing ERA • and Banner integration as a high priority, and charge them with completing integration of account setup and accounts receivable as an immediate priority. The Review Team understands that OIT supports most of the institutional IT needs and that there will always be emergencies that must be put ahead of other less demanding needs. However, the integration of account setup and of accounts receivable creates a huge, unnecessary workload for CGA that has existed since Banner was implemented. Relieving CGA of this extra load would permit them to devote their time to tasks that cannot be automated such as monitoring financial compliance requirements on sponsored awards. Furthermore, such integration would significantly reduce the amount of time between award acceptance and account creation. Concerns regarding directly moving account data from ERA to Banner could be alleviated by establishing a process whereby ERA transmits a temporary record to Banner that is validated by CGA staff before being finalized into a Banner account. Discussions between the ERA Director and the Director of OIT have already acknowledged the efficacy of this methodology.
- <u>Recommendation</u>: The institution should evaluate the overall IT resources and infrastructure required to support the research enterprise, including for centers, departments and central administrative units, and establish a consolidated IT plan that sets forth roles and responsibilities as well as an integrated system and process development plan. The Review Team is not suggesting that the OSP IT group and OIT need to be combined. In fact, the OSP IT group is rather well situated to perform its current responsibilities, and possesses the knowledge, expertise, and resources in order to do so. Rather, since support of research activities has clearly not been established as a priority



for OIT, but OIT is essential to some of that support, the institution needs to coordinate efforts between the two groups in order to better support the research enterprise.

VI.B. STANDARD for Institutional Management of Research Administration Data.

Accurate and accessible data on sponsored programs activity and management is maintained and protected and the data covers areas of sponsored projects activity that relate to efficiency and research management metrics. Trends in activity over time is tracked and appropriately reported. Policies and processes are in place for data security and data related to classified research. As appropriate to the institution, research administrative data also includes clinical trials, clinical research, and other externally sponsored activities.

UAH has established some expectations for collecting and reporting on research administration operations, specifically the OSP ERA system tracks the length of time to process proposals and awards, as well as the volume of activity. PIs and center/departmental staff can view this information via the PI Portal, a web-based front-end for ERA system. The length of time for processing account setups is not currently available, due to the fact the process is manually completed as described under Standard VI.A.

> • <u>Recommendation</u>: Once account setup integration is completed between the OSP ERA system and Banner, the OSP IT group should work to incorporate processing metrics in the data available to OSP and to the rest of the institution. Doing so will result in a complete picture of OSP and CGA processing of transactions, and provide better transparency to PIs as to the status of account setups and changes.

The ERA system possesses robust reporting capabilities, including information on

- Proposal submission
- Awards
- Subawards
- ▲ Federal Accountability and Transparency Act (FATA)
- 🔺 Pls
- Sponsors
- Success Rates



Data can be accessed directly by the PI via the web-based PI Portal. On a monthly basis, OSP generates reports representing campus, center, and college activity in these areas.

The Office of Research Security (ORS) oversees the management of confidential data received by UAH researchers, faculty, and staff. The institution relies primarily on training to prepare researchers, faculty, and staff to know when to contact ORS for guidance. Once contacted, ORS will provide cleared recipients with the Operational Security Standard Practices and Procedures (OPSEC); for non-cleared recipients, the recipient must sign the Proprietary Information Protection Form. None of this information appears to be available on the ORS or Office of Sponsored Programs websites, although the latter does provide a training module on the handling of confidential information in general.

• <u>Recommendation</u>: The Office of Research Security should consider posting on its website information about the management of confidential information in the possession of UAH researchers, faculty, and staff. While it may be that cleared individuals, by virtue of their training, are knowledgeable about how to handle confidential information and when to contact ORS for guidance, this is likely not true for non-cleared individuals. Making this information easily available will increase the likelihood of proper management of confidential information.

VI.C. STANDARD for Research Administration Data Accessible to Constituents.

Institutional data can be manipulated to respond to internal and external constituent needs. Data and reports are presented in a manner that is easily understood by faculty. Appropriate to the size and volume, institutions make accessible real-time financial data.

An important consideration of any institutional research enterprise is the availability of data to PIs, administrators and campus leadership. To be useful the data must be timely, accurate, and easy to obtain. UAH possesses two entirely separate systems for maintaining and reporting on data essential for efficient research administration and compliance: the Banner financial system, which tracks financial transaction data, and the OSP ERA system, which tracks all other research administration data. Each system provides canned and ad hoc reporting capabilities and a separate user interface for PIs and other users.

For the most part PIs and other campus users remarked that they were able to get the information they needed from the OSP ERA system about proposal and award activity and the status of proposal processing. However, the Review Team heard almost universally from each group of interviewees that PIs were unable to get necessary



information about the financial status of their awards from the Banner system. The concerns stated by PIs and by their staff included the following:

- Banner reports were not up-to-date (e.g., one to two weeks old);
- Pls could not get summarized information;
- Pls could not get detailed information;
- Billing of sponsors was often late, but PIs and staff had no way to view the billing status of any particular award, nor were they able to get that information from Contract and Grant Accounting.

On the other hand, representatives from the various Finance and Administrative units were consistent in their comments that Banner provided robust reporting, with both canned and ad hoc capabilities. PIs were also consistent in their desire for training in financial management of their awards, in accessing and interpreting Banner financial reports, and in getting staff support to assist them with the above.

The administration and the PIs do not agree over what they believe to be timely and accurate financial data. Perhaps this is a matter of perception. For example, the Banner financial reports intended for PIs were likely designed as the institution's official statement of record-- a look back at what financial activity has already occurred. However, most PIs and their support staff often need data that is timelier—such as expenses that have been incurred but not yet posted. In addition, PIs and support staff need the ability to make forecasts or projections to assess the future state of their award finances. Furthermore, PIs must develop their budgets and monitor expenditures in relation to those budgets along a specific time line, different reporting formats, and often with specific reporting requirements that incorporate both technical and financial progress.

- <u>Recommendation</u>: In consultation with PIs, UAH should develop project financial reports targeted to PIs. Both the institution and sponsors consider the PI primarily responsible for both the technical and financial conduct of an award. It is essential that PIs have access to timely and accurate data in a form they can use in order to assist them in this role. Given the large number of PIs at UAH, it should be a priority to provide PIs with the needed information. Since PIs already use the OSP ERA system to obtain their other sponsored project data, and since OSP is familiar with sponsor requirements and is accustomed to working with PIs and their support staff, perhaps OSP could be charged with this task once the appropriate linkages are established from Banner to the ERA system.
- <u>Recommendation</u>: CGA and the Senior VP for Finance and Administration office should develop PI-specific training that



addresses the essentials of project financial management, including what tools and information are available to them, how to access those tools, and how to interpret financial reports. This training may also include participation by the college and center administrators who can provide their expertise on the various shadow systems used to provide information for forecasting, projections, and transactions in process.

VII. Institutional Affiliations and Relationships

VII.A. STANDARD for Research Affiliations with Other Organizations.

The institution has clearly defined all relationships with hospitals or other organizations that are participating or collaborating in research activities. These relationships apply to research activities flowing in through the affiliate as well as flowing out to the affiliate. Defined relationships additionally includes research-related institutional services (such as oversight for regulatory compliance areas such as human or animal research) provided to other organizations.

UAH has a long history of research collaborations with Federal, academic, and industrial organizations primarily through its research centers. Because of UAH's strengths in science and technology, UAH has established individual and master agreements in place outlining these long-standing activities. UAH's expertise in federal contracting, primarily through the Department of Defense and NASA, is a strong foundation in writing and negotiating long-term and master agreements. Their collaboration agreements address the requisite terms and conditions including the scope of the research activities as well as the administrative requirements such as reporting, control of confidential information, facilities usage, and payment. As UAH expands its research scope and funding, it will benefit from its experiences in this area.

• **Recommendation**: None.

VII.B. STANDARD for Research Affiliations with Non-Employed Individuals.

The institution has clearly defined relationships with individuals who are engaged in conducting research, but who are not employees. Such individuals include visiting scholars, courtesy faculty, or other zero-percent-appointment individuals who are afforded space and responsibilities associated with research activities.

UAH conducts collaborative research with individuals outside the university. Again, its extensive experience in defense and space research has provided the institution with an



understanding of the importance in clearly defining the rights and expectations of visiting scholars, researchers, and faculty in their affiliation with UAH. UAH has developed procedures for non-affiliated individuals to hold a non-payroll title within the institution. Such titles permit the usage of appropriate university resources and facilities as well as obligating the individuals to comply with appropriate policies and procedures. Additionally, in recognition of the fact that awards are made directly to the institution, UAH does not permit non-employed individuals to serve as sole lead PIs. Lead PIs must be employees of UAH with non-employees treated as co-investigators, research staff, or consultants depending on their specific contributions to the project. UAH's existing expertise will continue to prove beneficial as its research portfolio grows in the future.

• Recommendation: None.

VIII. Sponsored Program Operations: Funding and Proposal Services

VIII.A. STANDARD for Funding Resources.

The institution provides faculty, staff, and students access to information on prospective sponsors (such as federal, state, local, private foundations). These constituents are provided tools and assistance as appropriate to the culture of the institution, the level of activity, and the relative importance of research in strategic goals.

Multiple people redistribute funding information to faculty and researchers. Emails come from the grant writer, the OSP staff, the College coordinator, the Center budget analyst, sometimes the Dean or Center Director, the *Weekly Funding Bulletin*, the website. Because faculty receive multiple emails about the same potential opportunity some faculty merely ignore these duplications and others remarked that by the time they receive the information they already know about it through their channels. The *Weekly Funding Bulletin* receives mixed reviews both for its content and for timeliness. It includes funding alerts, training events, and in some cases policy updates. As regards funding alerts, since the *Bulletin* comes out weekly short deadlines are not well served by this means of communication. It should also be taken into consideration that the Bulletin requires time and effort of the grant writer that might need to be redirected to grant writing and related support.

The current information dissemination process should be closely examined to assess how efficient and well it is working. The Reviewers recognize that the redundancy is well intentioned but the process should be examined especially in light of the fact that the grant writer, who has primary responsibility for this, is being reassigned to the Proposal Development Office (PDO). The PDO Director explained that their new office



function will be targeting large and complex proposals so it is important that funding identification services go beyond this scope and be applied in a way that are valuable to the faculty.

Currently there is no centrally maintained profile of faculty research interests. Such services offer a uniform keyword based system that matches opportunities to interest and generates an email alert. Such commercial services including the previously UAH licensed Community of Science (COS) would provide timely dissemination of both federal and private and corporate foundations, as well as international opportunities. It was stated that COS was dropped because it was too expensive but the Reviewers are of the opinion that a commercial service would be appropriate and useful to have in place.

Faculty and other end users have not been surveyed as to their needs, or the adequacy, and quality of the funding information services they receive. In addition, as PDO assumes responsibility for these services, they should develop an assessment tool of their services on an ongoing basis.

• <u>Recommendation</u>: The VPR should conduct a survey and assessment of faculty and researchers to gather information for an assessment of their needs in the area of identifying funding sources and proposal development. The survey should include questions regarding the adequacy and quality of current resources and services.

Based on the survey results and input from PIs and campus/center administrators, funding and proposal services could be enhanced by taking the following steps.

- <u>Recommendation</u>: OSP should identify and evaluate commercial services (e.g. COS Pivot, InfoEd Smarts Genius, etc.) to provide electronic funding alerts directly to users (faculty, researchers, and staff).
- <u>Recommendation</u>: OSP should streamline the funding dissemination effort by subscribing to a commercial service and provide targeted assistance in building faculty profiles. These commercial services would also be of value to the new Proposal Development Office to keep them apprised of opportunities and for planning purposes.
- <u>Recommendation</u>: OSP should determine and advertise through outreach activities the individual who will be responsible for the funding alert service faculty sign-up and maintenance, as well as the ongoing training for its use by the end user.



• <u>Recommendation</u>: OSP and PDO should review and assess the content of the Weekly Funding Bulletin to determine if this is providing the necessary value. If the grants writer will be refocusing efforts on grants writing, a weekly bulletin might not be efficient, especially if a commercial grants funding alert service is procured.

VIII.B STANDARD for Proposal Assistance.

Appropriate to the size and needs of the institution, assistance is extended to assist faculty and research personnel in responding to funding opportunities and preparing proposals.

UAH has no centralized proposal development services office; however, they are in the process of starting up a new Proposal Development Office that will primarily focus on large and complex proposal efforts. There were recurring remarks that few people used the service of the grant writer or had knowledge about her. Yet, many faculty members requested assistance with technical writing support, technical editing, boilerplate material, administrative core narrative, and proposal assembly. The concern is that if UAH wants to grow its portfolio aggressively, visible and targeted assistance in proposal development is necessary. Moving the grants writer to the Proposal Development Office provides the opportunity to enhance visibility and promote access to said services. However, without adding staff to do this, it will be important to communicate the type and level of services that will be available. If RDO pursues large and complex proposals of a highly technical nature, it might warrant consideration of also bringing consultants on board on a project-by-project basis.

Large and complex project development benefits by a team approach that includes the pre- and post-award staff. It is important that the narrative document not be done in isolation from the budget and strong ties must exist between those responsible for these pieces. Faculty and researchers remarked that while there was central and local support for budget construction there was no support for developing the administrative sections, no proposal writing assistance, and to date a general lack of understanding on what the grant writer could and would do. They had positive remarks regarding the budget assistance they received from their Contract and Grant Coordinator or their analyst. Additionally, faculty expressed a need and a desire for pre-submission proposal reviews for the proposal content and perceived competitiveness; especially to have subject matter expert teams review the proposal drafts for large and complex projects. PDO can provide this service as part of their collaboration support.

In the past, proposal-writing training was offered annually by OSP who procured services from an outside consultant(s). These workshops were well attended in FY12 (Write Winning Proposals - Russell – 30 participants; Breaking the Barriers to Writing Proposals – Lucas – 16 participants; Writing Winning Grants – Atkisson – 21



participants). In FY13, the training calendar showed only one proposal writing workshop with 20 participants, and the current calendar did not reflect any, though they might be in the planning stages. Proposal writing workshops are important and should be offered in both semesters as well as targeted agency specific and/or program specific workshops that understandably might have smaller attendance (e.g. NSF MRI etc.). Corporate and foundation proposal writing workshops should be offered as the strategic plan indicated a desire to diversify the UAH portfolio. Foundation proposals are different and there is a lack of history in pursuing this sector. However, partnership with Development might provide assistance in how to develop letters of inquiry and corporate and foundation proposals.

- <u>Notable Practice</u>: The Vice President for Research has created a new office, the Proposal Development Office, which will provide support and guidance in the development of large and complex proposals.
- <u>Notable Practice</u>: The OSP has offered proposal writing workshops and dissertation writing in its training venue.
- <u>Recommendation</u>: The PDO, OSP and CGA, and the Development Office should engage in targeted outreach to staff, researchers, faculty, and Deans and Directors to assure clarity of their services and enhanced visibility. This should be done through a variety of mechanisms including the PDO and OSP websites, introduction memos to Deans and Directors, faculty and staff meetings, the New Faculty Orientation workshop and an internal press release.
- <u>Recommendation</u>: PDO should take responsibility for proposal writing workshops and seminars that could be delivered by existing consultants, or others. In addition, PDO should develop a proposal writing series that could be offered throughout the year in a "lunch and learn" short format so that faculty could easily attend. PDO could develop this series using UAH expertise from faculty, staff, and leadership.
- <u>Recommendation</u>: PDO staff should participate in national conferences to gain working knowledge about upcoming grant opportunities such as NSF or NIH grants conferences that are convened around the country, as well as other professional organization training.
- <u>Recommendation</u>: UAH should consider drafting boilerplate material for commonly needed sections of research proposals, such as for data management, responsible conduct of research, graduate and postdoctoral mentoring, etc. Several federal sponsors (e.g., NSF, NIH,



NASA, and DOE) require PIs to include information on various aspects of institutional infrastructure, such as data management, responsible conduct of research, and graduate and postdoctoral mentoring. While it is true that aspects of these topics would be unique to the proposed project, it is also likely that each college and center, and the institution as a whole, oversee aspects that are common to all members of the respective organization. For example, if the institution were to draft wording addressing data management resources available from the Office of Information Technology, and then the college or center describes its resources, the PI would only need to write to how they would utilize those resources for the specific project, and what they might need to add in order to accomplish the project. This standardized content would greatly facilitate the PI's writing of research proposals.

UAH follows a centralized proposal preparation model whereby the PI will contact the appropriate individual within the Office of Sponsored Programs (OSP) who will take the lead in reviewing relevant sponsor requirements, working with the PI to develop the budget, completing forms and uploading information to sponsor systems, and submitting the proposal on behalf of the institution. The only proposal elements solely prepared by the PI are those addressing the science. OSP staff assignments are based on college or center, thus PIs have consistent contact with the same individual(s) within OSP during the life of a proposal/award.

OSP handles all sponsored projects proposals, awards, subawards for research, public service, and instruction as well as material transfer agreements, confidentiality agreements, unfunded collaboration agreements, service agreements, and MOUs. A separate office handles gifts. Despite policy to the contrary, PIs do sometimes submit to sponsors directly – both informally ("party napkin agreements") and more formally. There do not appear to be consequences for faculty who repeatedly circumvent this policy; however, there are internal management controls to ensure that projects that did not go through OSP are re-directed there at time of award.

Although labor-intensive for the OSP staff, the centralized model of proposal preparation negates the need for many of the pre-award office reviews often required in decentralized models. For example, the OSP staff is very familiar with the requirements for consistency with sponsor proposal guidelines, forms and format as well as application of institutional policies related to cost sharing, effort, subrecipient monitoring, compliance issues, export controls, sponsor terms and conditions, and allowable costs.



IX. Sponsored Program Operations: Proposal Review and Submission

IX.A. STANDARD for Proposal Review.

The institution has a consistent approach for reviewing and processing proposals that is in compliance with institutional and sponsor guidelines and requirements. The roles and responsibilities associated with the proposal review and submission activities are clear. Appropriate management systems are in place and the proposal review process interfaces smoothly with regulatory process/systems and the systems/processes for accepting and managing any subsequent awards.

OSP staff have several robust tools available to them to assist them in proposal preparation and review. These include a proposal checklist, and a document entitled "Proposal Guidelines" which sets forth relevant UAH policies, roles and responsibilities, a discussion of F&A, routing and approvals, timing of proposal reviews and sample budgets. Also available to OSP staff is the "Pre and Post Award Desk Guide and Procedure Manual."

Another useful tool is the Investigator Research Portal (PI Portal), developed and maintained by the OSP IT group, and a part of the OSP ERA system. This tool provides for routing and approval of proposals, including collection of information about effort, cost sharing, conflict of interest, F&A waivers and environmental health and safety issues. This system feeds information into the ERA system and provides routing for required approvals.

<u>Notable Practice</u>: OSP has invested significant time and effort into developing useful and robust tools to assist staff and investigators in preparation of proposals.

The OSP website contains useful information and guidelines on topics such as OSP staff assignments (e.g., who to contact), proposal preparation and routing procedures, rates, institutional policies on cost sharing, conflict of interest, limited submissions and F&A waivers.

The Review Team observed that OSP staff was knowledgeable about the institution's pre-award procedures and with sponsor requirements. OSP procedures define clear roles, responsibilities, and authorities for the offices responsible for proposal preparation, routing and approval, and submission. While the procedures were clear within OSP, there was not the same level of clarity among PIs, centers, and departments. This uncertainty leads to multiple checking and re-checking of various parts of the proposal and in some cases, misassumptions on who is responsible for making changes or corrections.



In general, PIs and their support personnel commented that they were satisfied with the proposal services provided by OSP and many praised OSP for its customer service; many interviewees specifically mentioned that they had good working relationships with their assigned OSP representative.

That being said, faculty and their support staff did express concerns regarding the newly implemented 5-day internal proposal deadline as well as their inability to modify the budget and/or project plan during proposal routing without the process having to start over again, especially in light of the new 5-day internal deadline. Moreover, other than budget preparation and submitting the proposal, most did not seem to understand what OSP did.

- <u>Recommendation</u>: OSP should perform a risk-based assessment of its current parameters for reviewing and revising proposals once they have entered the routing process, and relax those parameters based upon relative risk. Given the fact that OSP staff have been involved in the development of the proposal, there should be very few surprises in the proposal. In addition, not all proposals have the same level of complexity. Since OSP is not staffed to evaluate the science of research proposals, it may be appropriate for the PI to make narrative modifications up until the day of submission, if the Director or Dean, the individuals responsible for the evaluation of the science, approve. Implementation of this recommendation could be tied into the recommendation below for level-of-service guarantee.
- Recommendation: OSP might consider converting its 5-day deadline • to a level-of-service guarantee, whereby OSP will provide varying levels of proposal review based upon the amount of time provided by the investigator. In this scenario, the PI selects the level of review and takes responsibility for anything wrong with the proposal based on what OSP could review. For example: with 5-days advance submission OSP staff will review the proposal against all program guidelines; with at least 3 days advance submission OSP staff will provide basic review, such as all proposal sections are completed and within their page limitations; and with at least 1 day's lead time OSP staff will perform legally minimal and necessary policy-based review, such as verifying rates, conflict of interest, cost sharing, biosafety and research subject review; and if submitted to OSP on the submission date, the proposal would be submitted and OSP would perform the +1 day review post submission to the sponsor, reserving the right to withdraw the proposal if it contains something the institution cannot accept. An institution that utilizes this model is: https://researchadministration.caltech.edu/osr/fag#lead-time



• <u>Recommendation</u>: OSP should develop outreach materials for PIs, deans and directors that describe what OSP does during proposal review, why it is necessary, and how it benefits the PI. This information should include why the 5-day review period is necessary in light of the fact that OSP is involved in proposal development up to the point the proposal begins its routing. In addition, OSP should include information on the number of proposals typically submitted on various deadline dates and the time involved in actually submitting proposal materials. This information is helpful in building PI awareness that not all proposals can be submitted on the same day as they are received by OSP.

The limited submission process is coordinated by OSP, on behalf of the VPR who determines the review methodology based on the nature of the call. The process was clearly understood by OSP personnel and available to UAH investigators and staff via the OSP website.

IX.B. STANDARD for Proposal Submission.

The institution has adequate understanding of submission requirements for electronic and nonelectronic proposal submissions.

OSP serves as the primary point of contact for policies and procedures for proposal submission. Since OSP prepares most aspects of the proposal, and submits it, PIs work directly with their assigned OSP representative. The Reviewers observed that OSP staff was knowledgeable on how to submit proposals through sponsor systems, including NSF FastLane, NASA NSPIRES, and Grants.gov.

UAH does not currently possess the capability to submit proposals electronically to Grants.gov; UAH utilizes the Grants.gov-provided Adobe form sets for this purpose. The OSP IT group commented that they could develop a Grants.gov interface. However, current proposal activity that utilized Grants.gov did not warrant system-to-system development.

The Review Team heard consistently expressed concerns from PIs, as well as from college and center staff, regarding the proposal submission process. For example

The VPR has instituted a policy of submitting proposals to meet their deadlines no matter what. However, in conversations the OSP staff did not appear to be "authorized" to submit their proposals under this new mandate concept unless they obtained permission in order or to do so, which causes delays in proposal submission. In order to get the proposal submitted with less than 5 days lead-time, both the OSP Director and the VPR must approve it.



- OSP has a stated policy of processing proposals on a first-in/first-out basis. However, OSP does not submit a proposal until the day it is due even if the proposal arrived in OSP by the stated internal deadline. The Review Team surmises that in its attempt to review all proposals thoroughly, OSP is inadvertently penalizing PIs who submit early.
- PIs are often not informed until just before the proposal deadline of the need for them to take required training in order to allow proposal submission.
- Proposals are delayed within OSP due to multiple levels of review, and OSP staff believes proposals need to be perfect before they can be submitted. It was not clear whether this practice was by design (top-down), or because less- experienced OSP staff did not feel confident in their skills and requested higher-level review of proposals (bottom-up). Whichever the case, such a practice is inefficient.

The above comments are symptomatic of a situation where staff, which may otherwise be very knowledgeable in how to perform their jobs, do not have the authority to perform them, or are not confident in exercising that authority. Faculty seem confused about the process, dissatisfied with the change from 3 to 5 days; and departmental and center staff do not uniformly understand the deadlines, the need for the five days or the override process for submission if the proposal arrives in OSP with less than 5 days.

- <u>Recommendation</u>: OSP should consistently follow its policy of processing proposals on a first-in/first-out basis. Pls should be rewarded for meeting internal deadlines by early submission of their proposals. This would likely encourage other Pls, who are otherwise normally late to meet those internal deadlines. This policy should be able to be consistently applied if done so in conjunction with implementation of the other risk-based and level-of-service recommendations.
- <u>Recommendation:</u> OSP should clarify and educate faculty about the internal deadlines via e-mails, website and policy statements, and the potential risks of late submission to OSP.
- <u>Recommendation</u>: OSP leadership should consider giving OSP staff the authority to submit last-minute proposals in compliance with the VPR's stated goal, without needing to obtain higher-level authority. Very few issues cannot be corrected at the award negotiation stage. Alternatively, the proposal can be withdrawn if issues are found with the proposal that the institution cannot accept. In addition, if UAH implements level-of-service recommendation in Section IX.A, the OSP can perform a minimal, compliance based review post-submission in order to determine whether there are still issues to address internally, or if it will be necessary to withdraw the proposal.
- <u>Recommendation</u>: OSP leadership should consider establishing tiered levels of signature authority based upon relative risk, with risk based on the nature of the proposal. Proposals have various levels of risk based on a



number of factors, including the sponsor, the nature of the project (grant or contract; research or service, etc.) and even the value of the proposal. By assigning levels of authority to OSP staff based upon risk factors, OSP staff could exercise greater and greater signature authority based upon experience and training. For example: federal grant proposals under \$500K in direct costs per year, and with no extraordinary compliance issues could be signed-off by the lowest experience level in OSP; for anything more complicated, the proposal would go up to the next highest level of responsibility that could approve that proposal (but not up through each intervening level).

The Review Team did read the University of Alabama at Birmingham's policy and understands that current System policies offer limited flexibility. However, The Team encourages UAH to explore how University of Alabama at Birmingham might be applying those policies to their infrastructure in the context of their proposal volume. While it may currently be difficult to change the policy, this issue will become increasingly critical as research award levels increase. The Team believes it is worthwhile for UAH to engage in conversations with the Trustees about possible flexibilities and alternatives (such as multiple or limited delegations) to the existing model. Other institutions have similar delegatory limitations and have established protocols to manage them.

X. Sponsored Program Operations: Award Acceptance and Initiation

X.A. STANDARD for Award Review and Negotiation.

The institution has a consistent process to review terms and conditions of grant, contract, and agreement awards. Incoming subawards are reviewed for the terms of the subaward and the flow-through terms of the prime award.

The institution evaluates all awards for sponsor restrictions on such items as the use of funds, appropriate project personnel, publication rights, or intellectual property to assure compliance with institutional policies that govern the research activities of the campus.

The Office of Sponsored Research handles all sponsored projects for research, public service, and instruction as well as material transfer agreements, confidentiality agreements, unfunded collaboration agreements, service agreements, and MOUs. A separate office handles gifts.

OSP staff negotiate awards based upon departmental assignments, thus any one staff member may handle different types of transactions based upon the activity of their assigned unit(s). When a negotiator reaches a point beyond their knowledge or experience they are encouraged to seek advice from higher up within OSP; they are



also authorized to engage directly with the Office of Counsel, Office of Technology and Commercialization, or other appropriate campus office.

OSP has developed extensive procedures for the processing of award transactions, covering the process between the department and OSP, as well as between OSP and other units. The primary document is the OSP "Pre and Post Award Desk Guide and Procedure Manual" which provides extensive systematic instructions to OSP staff on all aspect of proposal and award processing.

• <u>Notable Practice</u>: OSP has extensive materials available on their website for both OSP staff and campus investigators and staff regarding various aspects of award policies and procedures.

The Review Team observed that OSP staff understand their roles and possess the skills necessary to carry out their responsibilities with regard to review and negotiation of awards. Within the parameters of their respective responsibilities, OSP staff appeared to be familiar with those institutional policies and federal regulations necessary for carrying out their responsibilities, including intellectual property, publication, export compliance, and protection of research subjects.

From a process point-of-view, the assigned OSP staff member will review an award, including comparing the proposed and awarded budgets and Statement of Work. OSP staff will note any exceptions and they have authority to negotiate award terms. They will then provide a copy to the PI for comment and acceptance. At this point, the award is forwarded to the OSP Director for review and approval.

• <u>Recommendation</u>: OSP leadership should consider implementing a tiered, risk-based signature authority for OSP staff to sign awards similar to that recommended for proposal submission. Not all awards are created equal in terms of their risk, for example, an NSF grant is generally a more straightforward federal award than a NASA contract. To have the OSP Director review and sign/accept all awards seems overly burdensome for both OSP staff and for the Director and unnecessary when viewed from a risk-based approach. By assigning levels of authority to OSP staff based upon risk factors, OSP staff could exercise greater and greater signature authority based upon experience and training. In fact, OSP staff could be authorized to sign/accept awards for the proposals they are authorized to submit.

The Review Team understands that current System policies offer limited flexibility. While it may currently be difficult to change the policy, this issue will become increasingly critical as research award levels increase. The Team believes it is worthwhile for UAH to engage in conversations with the Trustees about possible flexibilities and alternatives to the existing model. Other institutions have similar delegatory limitations and have established protocols to



manage them.

Regarding ancillary agreements (e.g., nondisclosure agreements and material transfer agreements), there do not appear to be specific policies and procedures addressing them, although the OSP website does have a sample nondisclosure agreement available for download.

• <u>Recommendation</u>: OSP should publish instructions on their web site explaining the recommended use and processing of non-disclosure agreements and material transfer agreements. Instructions should identify the purpose of the agreements, when they are appropriate, which UAH office(s) handle them and what approvals are required. While UAH may not currently have much activity requiring the use of nondisclosure and material transfer agreements, UAH's goal of increasing its research portfolio, including industrial sponsorship will likely generate much more activity with these types of agreements. Having clear and defined processes will facilitate use and implementation of these agreements.

X.B. STANDARD for Subawards.

Outgoing subawards are reviewed and negotiated to reflect sponsor flow through requirements and institutional policy.

The Office of Sponsored Programs issues subcontracts and subawards. Specifically, three individuals within OSP are tasked to work on this activity. OSP subcontracts staff are authorized to prepare and negotiate subawards, and work with the OSP staff member responsible for the prime award to determine the appropriate flow-down terms to include in the subcontract.

UAH has robust policies and procedures for issuing subcontracts and subawards that include detailed guidance on distinguishing between vendor agreements and subawards, and assessing risk related to a subcontractor having adequate financial and management systems. The primary tool used by OSP staff is the recently revised OSP Subcontract Procedure Manual, which covers all aspects of issuing a subcontract, including: subcontract and subaward templates; subcontract types and classifications; subcontract checklists; subcontractor questionnaire and information collection form; invoice review and payment procedures; and closeout procedures.

- <u>Notable Practice</u>: OSP has done an excellent job of creating comprehensive instructions for OSP staff on the issuance and managements of subcontracts
- <u>Recommendation</u>: OSP should review subcontract policies to evaluate



whether the requirements should apply to all subagreements issued under research contracts or grants. The newly issued procedures are sound and appropriate when issuing subcontracts under federal contracts. When issuing subawards under federal or nonfederal grants, the same set of procedures and requirements may not be necessary. In those circumstances, UAH may have more discretion and latitude in the issuance of subagreements. OSP should evaluate its procedures to determine whether additional flexibilities can be provided.

Based on a requirement imposed by the previous Provost, all subawards/subcontracts must be submitted to the Office of Counsel for review before they can be issued by OSP. Once reviewed by Counsel, the subcontract is reviewed and approved by the OSP director.

One of the most common complaints from the groups of researchers and departmental personnel was the amount of time it takes from the point at which the department initiates a request for a subaward to the point it is actually issued. The comments stated that the period ranged from weeks to months. In fact, PIs indicated the delays were in some cases negatively affecting the research projects. These anecdotes do not appear to be a matter of misperception. Based on comments by the Office of Counsel and OSP staff, this review was not necessary for most subcontracts and could be left up to the discretion of OSP staff, as is currently done for prime awards.

- <u>Recommendation</u>: UAH leadership should consider rescinding the previous Provost's requirement for Counsel review of subcontracts and relegate the need for Counsel review to the current parameters used for grants and contracts issued to UAH. Implementing this recommendation would greatly speed up issuance of subawards with no increase in risk to the institution, and it would be a quick-win for streamlining OSP processes.
- <u>Recommendation</u>: OSP leadership should consider implementing a tiered, risk-based signature authority for OSP staff to sign subcontracts similar to that recommended for proposal submission and award acceptance. Not all subcontracts are created equal in terms of their risk, for example, UAH utilizes the FDP subaward template to issue subawards to other universities under federal grants. This template is routine among universities, and takes very little time to prepare or manage, versus a subcontract under a federal contract. To have the OSP Director review and sign routine, low-risk subawards seems overly burdensome for both OSP staff and for the Director and unnecessary when viewed from a risk-based approach. By assigning levels of authority to OSP staff based upon risk factors, OSP staff could exercise greater and greater signature authority based upon experience and training.



The Review Team understands that current System policies offer limited flexibility. While it may currently be difficult to change the policy, this issue will become increasingly critical as research award levels increase. The Team believes it is worthwhile for UAH to engage in conversations with the Trustees about possible flexibilities and alternatives to the existing model. Other institutions have similar delegatory limitations and have established protocols to manage them.

X.C. STANDARD for Award Acceptance.

The institution has a process in place that allows the formal acceptance of a sponsored award by designated individuals or offices. The award acceptance process interfaces smoothly with processes for proposal submission and award management.

This Standard has been addressed under Section X.A.

X.D. STANDARD for Award Activation and Notification.

The institution has a defined process to place a sponsored award in the accounting system and to make funds available to the principal investigator for expenditures. The institutional notification process for award activation is timely and clearly conveyed to appropriate positions, such as investigator and unit-level staff.

Once an award has been accepted and executed by the Office of Sponsored Programs, the award information is entered into the OSP ERA system, which tracks all aspects of award terms and conditions, compliance requirements, and account setup data.

The "OSP Pre and Post Award Procedure Manual" provides detailed instructions on award activation and notification, including entering award information into the ERA system, distributing award documents to PIs and their support staff, and establishing pre-award spending accounts.

One of the most common complaints from the groups of faculty and center/departmental personnel with whom the Review Team met was the amount of time it took from the point at which OSP accepts an award to when CGA creates the account within Banner.

More specifically, with regard to sponsored account setup, all information required for Banner account creation is available within the ERA system. OSP inputs this information since most of the necessary information comes from the award document and from their knowledge of sponsor requirements. This information is then output onto paper, routed to Contract and Grant Accounting via courier, and manually input into Banner by CGA. CGA also acts as a second review of the award terms to ensure that the information provided by OSP is correct prior to Banner account creation.



Please refer to Section VI.A for establishing an electronic interface between the OSP ERA system and Banner.

XI. Sponsored Program Operations: Award Management

XI.A. STANDARD for Fiscal Management.

The institution's control environment provides reasonable assurance regarding the effectiveness and efficiency of operations; reliability of financial reporting, and compliance with applicable laws and regulations. The institution maintains internal controls through processes, systems, and tools to ensure compliance with institutional and sponsor guidelines and requirements. Fiscal data is readily available through published reports, queries, or integrated systems for transaction processing, review and tracking of activities and reporting.

Extramural fiscal policies are often broad and written in a manner that leaves room for interpretation. Sponsors expect their funds to be treated in a manner that recognizes specific terms and conditions; however, sponsors also recognize that institutions are able to accomplish their research in a variety of methods under a range of administrative structures. In many areas, both federal and non-federal sponsors rely on the recipient's own policies and procedures. Within this framework, an institution has the ability to establish its operations, including policies and procedures, to optimize its research enterprise and appropriately allocate resources. These standards need to be balanced against the needs of the researchers and faculty to conduct their projects.

UAH is increasingly evolving from an institution primarily funded by research contracts from DOD and NASA. As the number of sponsors and the number of grants and cooperative agreements grows, the institution needs to prepare to deal with the different fiscal and programmatic requirements.

Fiscal and administrative duties related to sponsored projects include a variety of accounting and management responsibilities. These include financial transaction audit, financial reporting, invoicing, rebudgeting, and closeout. Equally important to these responsibilities are those duties involving the facilitation of activities of faculty, researchers, and other university administrative units. These facilitations are accomplished by clear and timely communications between OSP, CGA, and its customers.

As UAH continues its progress towards its strategic goals of increasing and diversifying its research portfolio, it will be important to set clear expectations on roles and responsibilities on an institution-wide basis. Sponsored programs management



requires actions by PIs, campus and center administration, and central administration. Duplication of effort or tasks not being performed can strain limited institutional resources.

> • <u>Recommendation</u>: UAH should prepare a complete inventory of post-award and financial tasks for all levels of the institution. Both OSP and CGA should compile a list of their respective tasks. In addition, the VP for Research and the VP for Finance and Administration should work with the faculty, researchers, centers, and colleges to define expectations for campus responsibilities for these tasks. The definition of tasks and the assignment of responsibilities are the first steps in setting expectations for which constituency or office will be the primary decisionmaker and contact point. A sample matrix of roles and responsibilities is attached in Appendix F.

As the demands for sponsored projects administration grow, it will be important to continue to assess whether the responsibilities are in the hands of the right people. It is also important that resources be provided to maintain appropriate levels of staffing with appropriate amounts of training and expertise.

All institutions are faced with defining the delineation of "pre-award," "post-award," and "financial" duties in the assignment of roles and responsibilities. The decision on the dividing lines between these units rests with each institution, which must consider its own unique history, culture, and availability of resources. Clearly articulating the differentiations between OSP Post-award and CGA will provide greater transparency to their customers and improved accountability. It will also provide additional clarity for making decisions regarding staffing and resources.

Recommendation: The AVP of Research and the AVP for Finance and • Business Services should develop a plan and timeline for the transfer of responsibility for transaction review from the OSP Post-Award staff to the CGA accounting staff. The plan should include an assessment of staffing needs. The current transaction review duties have been in OSP for several years. While this division of responsibilities allows CGA to focus on invoicing and revenue collection, it has also transferred a critical financial monitoring activity that is typically handled by accounting and finance staff. The current assignment within OSP has led to confusion for faculty, researchers, and campus administrators. It has also led to delays due to differing interpretations or missed communications between OSP and CGA. A clear delineation of responsibility needs to be made and communicated to all parties. To initiate this transition, the Director s of OSP and CGA should develop an estimate of the time and resources currently allocated to the transaction reviews. This information is critical in determining the timeline of the transfer of duties. Upon completion of



the estimate, the Director of Contracts and Grants Accounting and the AVP for Finance and Business Services should determine if additional staffing and resources are needed. OSP and CGA should jointly develop the timeline as well as the transition, training, and communication plan for the transfer.

• <u>Recommendation</u>: As part of the transfer of transaction review, OSP and CGA should explore a risk assessment based on sponsors and activities. Currently, OSP is doing a pre-review of 100% of purchase requisition transactions. In terms of financial compliance, many transactions pose little risk. While the use of procurement cards has reduced the amount of pre-auditing, there is room for further reduction. Because transaction review requires large amounts of resources, it is useful to consider whether there are low risk transactions that do not need this high-level of scrutiny. A risk assessment would determine the highest risk transactions that still need to be pre-audited and would set appropriate thresholds. CGA and OSP should work together to explore the setting of tolerances and thresholds for review. Their primary focus for continued pre-audit should be high-risk categories of expenditures and transfers. Items not determined to be high-risk should be handled on a post-audit basis. The Banner accounting system has the capability for providing sophisticated reports that could effectively review transactions on a post-audit basis.

Many sponsored project activities do not fall into a world of "black and white" decisionmaking. Policies and procedures need to have an exception process in place. UAH leadership and management were acknowledged several times for their recognition of the need for flexibility. Yet, there is concern that the balance between enforcing compliance versus providing flexibility has tilted to enforcement. UAH does have a cost policy regarding charges to grants and contracts that does incorporate the appropriate Federal requirements. It is not clear that there is a form or specific instructions for dealing with exceptions. Faculty, campus and center staff indicated that their process in place for handling exceptional expenditures ultimately ends up with direct contact with the Director of Sponsored Programs or the AVP of Finance and Business Services for a decision. While such a review process may be manageable at current research levels, it becomes more difficult as research activities expand and diversify. Exception processing should be well documented and clearly communicated to campus units. It also needs to be well understood by the sponsored project accountants and contracts staff. Because they are charged with the responsibility of enforcing extramural terms and conditions, it can be a challenge for these accountants to have a complete set of information to make informed decisions and to exercise flexibility based on the specific set of circumstances

• <u>Recommendation</u>: UAH should clearly document and communicate to PIs, centers and departments the expenditure exception process and provide a



consistent written form for approval. Additionally, the process should clearly identify the office and individuals designated as approvers.

Providing customer service related to fiscal management can be difficult. The need for proper stewardship is essential for sponsored funding. Oftentimes, the accounting and fiscal rules are difficult to understand in a research setting. This presents challenges to the Contract and Grant Accounting staff who must find the appropriate balance between fiscal compliance and accommodating the research activities. UAH does have mechanisms in place to properly segregate research awards and provide the required accounting, invoicing, and reporting. There are also policies in place although many of them are not always easily accessible. The Senior VP for Finance and Administration and the VP for Research have begun a process for policy review and dissemination.

- Recommendation: CGA should explore options to provide more timely responses to customer inquiries. The responsibilities of award set-up and maintenance, invoicing, financial reporting, pre-audit, closeout, and providing assistance to faculty and campus administrators result in many deadlines and time constraints. Focusing too much attention in one area can lead to missed deadlines in another. This is particularly true for accounting work, which is tied to strict schedules (such as month-end, end-of-quarter, and year-end). Oftentimes, it is not possible to respond to all of the requests that demand attention. Indeed, lack of timely responses to inquiries was a common critique during the interviews. OSP and CGA should work together to provide the names of contract specialists and grant accountants for each award. This may be accomplished by including their names on the "green sheets" or through electronic notifications. Additionally, CGA may wish to consider dedicating staff or student resources to responding to email and phone contacts.
- <u>Recommendation</u>: CGA should consider developing electronic reporting tools as a mechanism for providing additional information to faculty, researchers, and campus administrators. The most common information request during our interviews was the availability of copies of invoices sent to sponsors. While invoicing and revenue collection are the responsibilities of CGA, being paid by the sponsor is important to all parties at an institution. The ability to view a completed invoice or be informed of its submission provides valuable reassurance to the campus. Since invoicing information exists within the OSP ERA system, CGA should work with the OSP IT staff to identify a mechanism that easily makes this possible.
- <u>Recommendation</u>: The AVP for Finance and Business Services should review existing documentation requirements to explore the possibilities of eliminating unnecessary record keeping. In partnership with Internal Audit, the AVP for Finance and Business Services should work with the offices of CGA



and OSP to review the Federal record-keeping requirements related to appropriate documentation. Federal contracts and the IRS Code provide guidance on the types of required documentation and the dollar threshold. Record keeping beyond the Federal and State requirements presents additional audit exposure. UAH should consider adjusting its documentation requirements to better match current government guidance. A common example mentioned that should be reviewed is the need for boarding passes for airfare reimbursements.

XI.B. STANDARD for Administrative Management.

The institution has established management systems for the non-financial administration of awards. The institution has established processes to monitor and report program performance.

The Office of Sponsored Programs is responsible for the post-award management functions at UAH, including some financial monitoring. As mentioned in the previous section, the overlap of responsibilities between OSP and CGA does create confusion to the campus and centers. The recommendations mentioned previously deal with these issues.

Post-award management incorporates many tasks beyond financial oversight and accounting. Because of UAH's historical emphasis on federal contracts, there are policies and procedures in place for many aspects of award management, such as progress reporting, closeout, and record retention. OSP provides oversight to ensure that the proper reports are submitted. That office is also responsible for ensuring the proper closeout of awards. There are procedures in place to work with faculty and researchers to ensure that all non-financial reports are submitted. OSP works with CGA to ensure that all financial activity has been completed as well as submission of financial reports and invoices as well as receipt of all sponsor payments.

As mentioned in previous sections, UAH has recently revised its procedural manual on subcontracts. The manual includes sections on the management of subawards including the review, approval, and processing of subrecipient invoices. There is also guidance provided on subrecipient monitoring including the review of A-133 audit reports. There are procedures in place for reviewing the A-133 audit findings and responding to subrecipient's corrective action plans.

The Office of Budgets and Financial Planning oversees effort Reporting. UAH has an electronic certification system utilizing an after-the-fact reporting methodology as proscribed in OMB Circular A-21. The system is the Banner Effort Reporting module. The effort certifications are accessible through Banner. The June 2013 revision of the effort reporting policy outlines the requirements for certification, the frequency of reporting, and who is responsible for certifying effort. The policy also includes



provisions for revisions as well as sanctions for noncompliance. The Office of Budgets and OSP provide training jointly. The materials cover both policy and the use of the electronic system.

Recommendation: The Assistant Director of Budgets and Effort • should explore with OSP IT and OIT the feasibility of improving the data feeds between the Effort Reporting System and the OSP **system.** Currently, the effort system is loaded with data from the Banner HR module. Tracking in OSP is done on their own Effort Reporting list, which is a comparison of actual effort versus committed effort. Data for actual effort is stored in a different area from committed effort data. Automating the data feeds between the systems would improve the timeliness and accuracy of the comparisons. An additional piece of critical information is the amount of committed effort by the PI on a sponsored project. The effort commitment must be met in order to satisfy federal requirements and is tracked by OSP. It does not appear that this information is included on the electronic statement. Including the commitment information is a useful tool to assist certifiers in ensuring that their effort obligations on a sponsored project are being fulfilled.

Offices within the Finance and Administration division are responsible for Property Control as well as the disposition of surplus property. Policies and procedures have been revised in the past year. Purchases of new property on research funds require screening and approval by OSP and an approval form must be attached to the purchase requisition.

> • <u>Recommendation</u>: OSP might consider a risk-based approach to reduce pre-purchase reviews for selected equipment purchases. The current policy refers to an attachment to OMB Circular A-110 that requires equipment screening. Attachments to this circular were eliminated in the 1993 revision to the Circular. While this pre-screening may still be a requirement for certain federal contracts, it is generally not a requirement for many grants. There may be opportunities to reduce the number of pre-reviews by identifying certain types of equipment, certain sponsors, or certain grant programs that do not require this step.

OSP is responsible for identifying awards that have cost sharing requirements. This includes projects that are subject to salary cap obligations. The contract administrator will establish a separate project number that will capture the portion of costs borne by UAH. Awards are not released until the source of cost sharing has been identified. CGA is responsible for entering the projects into Banner. The process has been documented in the Cost Share Policy, which was revised in August 2013.



XII. Institutional Integration of Obligations Made with Sponsored Programs Activities

XII. STANDARD for Institutional Integration of Obligations Made with Sponsored Programs Activities.

The institution has developed mechanisms to interface separate oversight research areas within the institution that may be related to sponsored program activities. The institution provides appropriate linkages to and tracks commitments made with the acceptance of sponsor funding.

Communication and coordination of data between sponsored programs offices and compliance offices and committees is vital to a successful compliance program. Coordination of the information exchange between the Office of Sponsored Program (OSP) and the various research compliance functions rests primarily with OSP. In fact, much of the information as to what research compliance issues may apply to a particular project is collected at the proposal stage on the Internal Coordination Sheet for Proposals (ICS). Specifically, the ICS, having been prepared by the PI and passed through the Chair and Dean, or the Center Director, will identify use of animal subjects, human subjects, ionizing radiation, biohazards, and select agents. It will also identify potential export compliance and conflict of interest issues.

During the proposal review process, project personnel are verified as to whether they have completed training, which is required of all personnel charging to federally sponsored accounts: responsible conduct of research and export compliance, and conflict of interest training (only required for NSF and NIH projects).

Separately, for subawards and subcontracts, which are issued out of OSP, the Subrecipient Commitment Form collects information on conflicts of interest as well as use of humans and use of animals.

The state of the various compliance issues are tracked for each proposal in the OSP electronic research administration system (ERA). The funding status of proposals is communicated to the various compliance committees and/or oversight office as necessary.

Controls are in place to ensure that funds are not expended before appropriate approvals are in place. For example, OSP will not submit a proposal unless all compliance approvals are in place and affected project personnel have taken required training and have submitted their financial interest disclosures.

• <u>Recommendation</u>: UAH should consider reviewing its compliance approvals and training programs to determine which ones sponsors



do not require be completed at the proposal submission stage in order to streamline and simplify for PIs some of the pre-submission requirements by moving those requirements to the pre-award stage. For example, RCR training, required by NSF and NIH, only applies to individuals who are paid from NSF and NIH awards, and the training does not have to occur prior to award. Similarly, IACUC and IRB approvals are not required by regulation until the research will begin. Since more than half of all proposals are never funded, it is a huge burden for researchers and project staff to satisfy these requirements prior to proposal.

XIII. Export Controls

XIII. STANDARD for Export Controls.

The institution understands the scope of export controls, embargoes, and trade sanctions in the context of their institutional activities and in particular to their sponsored programs. Policies and a compliance program for export controls have been developed and are appropriate to the scope of research activities within the institution.

The Office of Research Security (ORS), the Director of which reports to the Vice President for Research, oversees export Compliance. ORS oversees not only export compliance, but also badging for the institution's secure research facilities, advising UAH personnel when traveling overseas, cyber security, and performing inspections.

The primary method of ensuring compliance is through education and training. Researchers and staff are provided training to help them identify potential export control violations and to notify ORS for assistance. The institution's export control policy, training materials, and other related information are all available on the ORS website. Training is available via both the website and in-person. There is also an Export Control certification program, which is targeted at off-campus researchers without access to on-campus training. The Reviewers observed that the Director of Research Security was knowledgeable regarding the applicability of federal export policies to the institution's activities.

The Office of Sponsored Programs (OSP) plays an important role in monitoring Export Compliance, in that the institution's proposal routing and approval form is the first point at which questions about export compliance are asked. OSP personnel are also educated to spot export compliance issues during the review of proposals and awards, and to notify the OSP director and/or the ORS Director when appropriate. Visual Compliance software is used in order to validate names of individuals and business partners against sanctioned or restricted lists.

• **<u>Recommendation</u>**: None.



XIV. Research Integrity

XIV.A. STANDARD for Research Misconduct.

The institution has policies and procedures that govern research misconduct. The research misconduct policy and procedures follow established federal standards, providing notification to sponsors, communication to the parties involved, and protection for whistleblowers.

UAH has a policy for handling research misconduct that was written in 1998. The policy addresses the internal disclosure, reviews, and protections during the investigations into possible misconduct. The policy does not include a discussion of the notifications to the sponsors as required. Sponsor notification; particularly in incidents involving human subjects, animals, or public safety require specific acts of disclosure to federal agencies. These notifications need to be made on a timely basis.

• <u>Recommendation</u>: Provide updated guidance on the current "Policy Regarding Ethical Standards in Research and Scholarly Activities at the University of Alabama in Huntsville." This guidance should include specific instructions on the appropriate notifications to federal agencies in the event of incidents involving human subjects, animals, or public safety. While UAH has not had extensive research in those areas in the past, future growth in those areas will make it necessary to address. The guidance should include specific assignments of responsibility, including who should make the disclosures. In addition, staff with responsibilities for research integrity, including OSP, should be informed of the requirements as well as maintain an understanding of applicable regulations, policies, and practices.

XIV.B. STANDARD for Financial Conflict of Interest.

The institution has policies and procedures that govern individual financial conflict of interests. Conflict of interest policies require the disclosure and review of financial interests as defined, at a minimum, by federal regulations and policy. The institution shares information on financial disclosures and review outcomes across administrative and academic offices as appropriate.

UAH has an interim policy in place for faculty and staff to determine whether their financial relationships and interests conflict with their primary research responsibilities. The policy is currently only applicable to researchers on NIH or NSF funding, although the expectation is that it will be expanded to cover all funding sources.

• <u>Recommendation</u>: UAH should finalize its conflict of interest policy taking into consideration the different requirements of federal



sponsors. UAH has acknowledged in its interim policy that NIH and NSF have specific guidance, which goes beyond the expectations at other agencies. As the institution proceeds in finalizing its policy, careful consideration should be given whether or not to impose these more stringent disclosure requirements in situations where the funding agency does not have similar expectations. Imposing across-the-board disclosure requirements increases administrative burdens and costs.

XV. PROTECTION AND OVERSIGHT RELATED TO RESEARCH ACTIVITIES

XV.A. STANDARD for Use of Humans in Research. NOT INCLUDED IN THIS REVIEW

The institution has effective systems in place that comply with federal and state regulations for the ethical protection of human subjects.

XV.B. STANDARD for Use of Animals in Research. NOT INCLUDED IN THIS REVIEW

The institution has effective systems in place that comply with federal and state regulations for the ethical protection for the humane care and use of animals.

XV.C. STANDARD for Biohazards and Select Agents. NOT INCLUDED IN THIS REVIEW

The institution has policies and procedures in place governing the safe handling and use of biohazards, including rDNA, infectious agents and blood-borne pathogens, and select agents in research, clinical and teaching activities. The accepted biosafety level at the institution is explicitly addressed in policy and guidance. The Institutional Biosafety Committee is clearly defined in policy and operates effectively with other administrative offices.

XV.D. STANDARD for Radiation and Laser Safety. NOT INCLUDED IN THIS REVIEW

The institution has policies and procedures in place governing the safe use of radiation and lasers in research and sponsored activities in compliance with federal and state regulations. Adequate staff and other resources are dedicated to training, oversight, and preparedness for laser or radiation-related emergencies.



XV.E. STANDARD for Specialized Research Activities. NOT INCLUDED IN THIS REVIEW

The institution has appropriate safeguards in place for research activities that are a part of research and other sponsored activities and require specialized oversight such as diving, boating, flight safety, or mining.

XV.F. STANDARD for Maintaining Currency in Field. NOT INCLUDED IN THIS REVIEW

Institutional expectations are clear that the staff involved with protection and oversight related to research activities maintain currency in their understanding of governing regulations and policy.



Appendix A: National Standards for Effective Sponsored Program Operations

The National Council of University Research Administrators (NCURA) developed these National Standards to represent the institutional baselines that provide a supportive environment for the conduct of research and other sponsored activities as well as the broad operational and core functional areas of sponsored programs management.

Unlike an audit, this peer review performs an assessment of your research administration "program" that goes beyond merely highlighting deficiencies in process. The assessment contains three interrelated features: senior and experienced research administrator Reviewers, the National Standards, and a philosophical approach that provides consistency in the review process with an understanding of institutional culture. These key features result in an assessment of **effectiveness** of sponsored research environments at the institutions undergoing peer review.

The NCURA National Standards are used by experienced and senior research administrators to assess the effectiveness of the research administration program. While recognizing that institutions differ in organizational structure and institutional priorities, these Standards reflect how the institution integrates the research enterprise with its institutional goals and expectations and operationalizes effective sponsored programs administration. The Standards allow Reviewers to assess how closely that integration relates to institutional and stakeholder goals and expectations. The Standards contain a list of over 165 features that are utilized by the Reviewers during their assessment and that are used as the basis for the written report.



Appendix B: NCURA Peer Review Team Bios



NCURA Review Team Bios for the University of Alabama in Huntsville

The National Council of University Research Administrators has developed a formal system of assessment for offices of sponsored programs, in part, from its purpose as a professional development organization. The mission of professional development organizations, like NCURA, is to provide education and training to its members as well as others within the research community. Many educational efforts implicitly, if not explicitly, provide information on effective practices, techniques for success, and models of excellence. Setting standards and identifying quality of organizational performance, therefore, are expected functions of professional development organizations. In fact, no other activity of a professional development organization may be as important as the articulation of the standards and core practices of the profession. The NCURA system of peer review was developed for this purpose.

Robert Andresen, TEAMLEADER

Number of Years in Research Administration: 27 Institutions University of Wisconsin-Madison

Robert Andresen is the Director of Research Financial Services and Associate Director in the Office of Research and Sponsored Programs at the University of Wisconsin-Madison. He has been involved in sponsored projects administration for over 27 years. He and his staff are responsible for all areas of financial and non-financial post-award administration at one of the nation's largest research universities (\$1.1 billion in annual R&D expenditures). He is responsible for reviewing and writing campus policies to ensure compliance with Federal and State requirements and guidance. Robert manages teams of professional accountants and supervisors that provide financial compliance through post-audit transaction reviews, policy interpretations, and training and guidance of campus administrators. Other post-award activities include sub-award negotiation and monitoring, close-out of all extramural awards, and accounts receivable and revenue management. In his previous roles as a manager and an accountant in RSP, he has had hands-on experience in all of these areas that he currently oversees.

Robert is the UW Audit Liaison for all Federal and Non-Federal audits. He works directly with the sponsors and their auditors in coordinating on-site and desk audits and is responsible for submission of all audit responses as well as working on audit resolution. He also provides training and instruction on sponsored programs administration topics for UW campus administrators and faculty. Also, in his current position, he has overseen the implementation of several campus wide software systems to manage extramural support activities including award setup, project accounting, effort reporting, financial reporting, invoicing, and accounts receivable. In addition, he and his staff are involved in the development and negotiation of the University's F&A and fringe benefit rates.

Robert has been a member of NCURA for over 20 years. He is currently the National Treasurer and Chair of the Select Committee for Peer Review. He has presented sessions at regional, national, and international meetings on a wide variety of research administration topics. Robert has been a co-chair of the annual "Financial Research Administration" meeting and also served on the Financial Management Committee. He is a past faculty member for the "Fundamentals of Sponsored Programs Administration" and "Financial Research Administration" national travelling workshops. He also is a participant in the Federal Demonstration Partnership and the Council on Government Relations.

Robert received his MBA in Finance from the University of Wisconsin-Madison.

National Council of University Research Administrators • 1015 18th Street NW, Suite 901 • Washington, DC 20036 (503) 364-1847 • <u>peerreview@ncura.edu</u> • <u>http://www.ncura.edu</u> Peer Review by Research Administrators for Research Administrators



David Mayo

Number of Years in Research Administration: 32 Institutions: California Institute of Technology, University of California-Santa Barbara

David Mayo has been involved in research administration for over 30 years. He is currently the Director of Sponsored Research at the California Institute of Technology, a position he has held since 2002. In this capacity David is responsible for the overall operations of the Office of Sponsored Research. His duties include negotiation and administration of complex sponsored awards, review and interpretation of existing and emerging federal and state policies and regulations, development and implementation of campus policies and procedures, and of training programs for campus staff in the area of research administration. David came to Caltech from the University of California, Santa Barbara, where he had worked in research administration for over 20 years.

A member of NCURA since 1988, David has served as a peer reviewer for 3 years. He is also serving as Chair of NCURA's Ambassador Corps, and as a faculty member for NCURA's traveling workshop: Fundamentals of Sponsored Project Administration - Global Edition. David received NCURA's Award for Outstanding Achievement in Research Administration in 2012 and the Distinguished Service Award in 2010.

Past service to NCURA includes the offices of Vice President, President and Immediate Past President; member of the Board of Directors, Chair of Region VI, member of the Nominating & Leadership Development Committee, and a member of several national meeting program committees. He has served as a faculty member of NCURA's Fundamentals of Sponsored Project Administration, and co-author of two of NCURA's Distance Learning Programs: *A Primer on Subawards under Federal Assistance Awards*; and *A Primer on Federal Contracting*. David has been a panelist and workshop presenter at numerous national and regional meetings on topics as diverse as the Federal Acquisition Regulation, federal contracting, international contracting, industry contracting, pre- and post-award administration, cost sharing, and subcontracting. He is also a contributing author to Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices, a publication of NCURA.

David represents Caltech at the Federal Demonstration Partnership (FDP), where he serves as a member of the Terms and Conditions Committee, the Contracts Task Force, and the Subawards Task Force. He has also served as an invited lecturer to a number of universities.

Denise Wallen

Number of Years in Research Administration: 35 Institutions: University of New Mexico

Denise Wallen, Ph.D. has been involved in research administration for over 30 years, including leading efforts in restructuring programs, developing new programs and services, office reviews and assessments, and has taught national workshops in research administration. Her career at the University of New Mexico included positions of Associate Director of Sponsored Projects, Special Assistant to the Vice President for Research, Director of Research Development and Strategic Initiatives. Denise retired in 2009 from the Office of the Vice President of Research in 2009 as Director of Research Development and Strategic Initiatives. During her tenure in the VPR office she was involved a range of research administration arenas in the pre-award environment including proposal and contract review, proposal development, proposal submission, developing and implementing training programs for PIs and research administrators, serving on numerous committees and interfacing with offices and schools across the campus, and the community at large.

She served on numerous university/faculty committees and university-business-industry committees; created/implemented university-wide policies and procedures, and developed and implemented department-collegacentral research administrator networking groups; and developed and institutionalized PI training programs. In 2010, she became the Research Officer for the Center for Health Policy at the University of New Mexico and to the College of Education (Dean's Office) where she is involved in research administration efforts including research development, faculty and staff training, proposal and budget development and review, developing strategies to incentivize efforts, and promoting research initiatives including the coordination of complex and large-scale



proposals. Denise has long term experience working with seniormanagement and leadership as well as faculty in science, engineering, humanities, social sciences, education and the professions.

Denise has given numerous national, regional and local presentations and workshops. She has moderated NCURA broadcasts on "International Collaborations: Negotiation and Compliance" and "Guiding the PI through Proposal Development, Submission and Award Management". She has served on numerous national NCURA committees, was and is currently, a member of the Board of Directors, Chair of the Professional Development Committee and currently serves as the Chair for the NCURA International Community Committee, Chair of the International Fellowship Program, and is a member of the Ambasador Corps. She received NCURA's National Award for Distinguished Service in Research Administration in 2008. She is also a member of the European Association of Research Managers and Administrators (EARMA) and is a member of the EARMA Professional Development Professional Organization of Research Development Professional Development Professional Development Professional Development Development Professional De

Assisting the Review Team and Reader for Review Report

Peggy S. Lowry

Number of Years in Research Administration: 39

Institutions: University of Illinois at Urbana-Champaign, Oregon State University, Ball State University, Murray State University

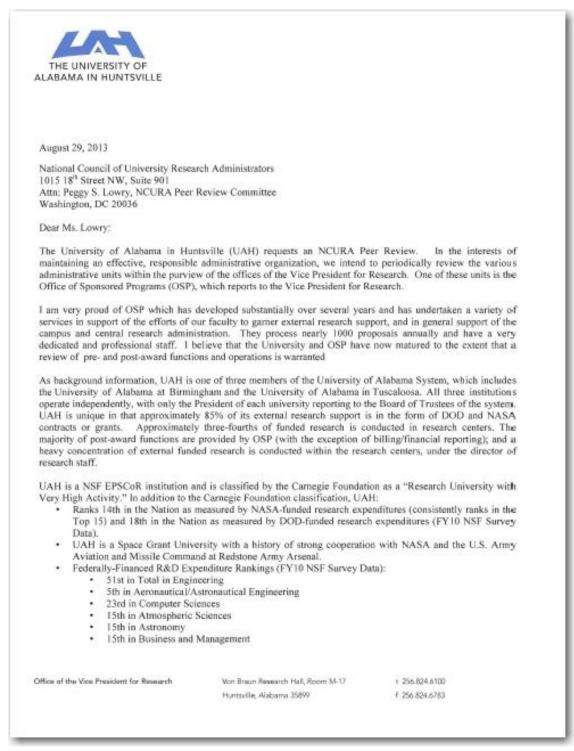
Peggy has been a team member or team lead on over 30 peer reviews of research administration offices, received evaluations of her offices, and has taught national workshops on sponsored program assessment. Peggy has led office self-studies and participated in institutional accreditation self-studies. She authored the chapter: "As sessing the Sponsored Research Office" (NCURA/AIS Sponsored Research Administration—A Guide to Effective Strategies and Recommended Practices) and published peer review articles: "But the Emperor Has No Clothes On! Or Assessing Your Operation with Fresh Eyes" and "Learning Your ABCs: Adaptability, Balance, and Culture" (NCURA Magazine). Peggy currently serves as the Manager for the NCURA Peer Review Program as well as serving as a Peer Reviewer.

Peggy served until her retirement in 2007 as Director of Sponsored Programs and Research Compliance at Oregon State University where she oversaw sponsored programs (\$250+ million in awards), non-financial research compliance areas, and served as Conflict of Interest Officer. She returned from retirement to assist by leading the University's new Office of Research Integrity, until 2011 when she retired again. Her career includes 22 years at the University of Illinois--Urbana-Champaign as Assistant Vice Chancellor for Research/Director, with 10 years as a College-level administrator, seven years in predominantly undergraduate universities: Ball State University and Murray State University in Director and Associate Director positions. At Ball State and Murray State she additionally focused on faculty development, institutional incentives for research, and integrating research with undergraduate education. While at Murray State University, she created a faculty Research Policy Committee to help promote the role of research at a predominantly undergraduate university; increased emphasis on research led to doubling the sponsored program awardlevel. At all of her universities she has worked extensively with faculty, Deans, and senior leadership. She served on numerous university/faculty committees, created/implemented university-wide policies, and engaged in department-central research administrator networking groups.

Peggy has given over 250 national, regional and local presentations and workshops. She has served on numerous national NCURA committees and twice served on their Board of Directors. During her career she served as a NCURA national workshop faculty for Fundamentals of Research Administration and Sponsored Projects Administration Level II, Chair of the Nominating and Leadership Committee, a member of the Editorial Review Board for *A Guide to Managing Federal Grants for Colleges and Universities*, and co-Chair of the NCURA newsletter. Peggy received NCURA's national Award for Distinguished Service in Research Administration in 2006 and the Award for Outstanding Achievement in Research Administration in 2011. She additionally served several terms on the Board of Directors of the International Society of Research Administrators and received several national awards from that organization. She has been a member of the Council on Governmental Relations.



Appendix C: Charge and Approach





Ms. Peggy Lowry August 29, 2013 Page 2

> Our Atmospheric Sciences Graduate Program is ranked in the Top Ten in the Nation according to The Chronicle of Higher Education.

UAH like many state funded institutions of higher education is experiencing financial challenges due to reductions in state support, a limited number of endowments, funding agency(s) reduction of F&A cost, and stagnant enrollment. This has placed a greater reliance on support from research funding which is growing annually at UAH. Our research expenditures for FY13 are expected to be about \$94M.

I understand that the review will utilize the NCURA National Standards. In your review I ask that in particular you pay attention to the following:

- The proper division of work for pre- and post-award functions at UAH;
- Proposal development, assistance, review, and submission processes;
- Award acceptance process (receipt, acceptance, notification, and management);
- Our organizational structure;
- Proper staffing and resources;
- Compliance Risk Assessment;
- Pre- and post-award processes;
- Faculty course buy-out process;
- Subawards processes;
- Research ethics and compliance;
- Electronic Research Administration;
- Communication and training;
- Publication of funding opportunities;
- Financial reporting (collecting, verification, billing, and aging report); and
- Effort reporting

I anticipate the NCURA Peer Review will validate many of our current processes and operations, as well as provide insight into areas requiring additional attention and/or resources. I strongly believe the information we receive from this review, will help UAH better invest resources and its effort to enhance and grow the research enterprise, which is a top priority of the Vice Presidents for Research and for Finance and Administration.

UAH looks forward to your report and very much welcomes your observations and suggestions. Thank you in advance for your willingness to undertake this activity. If you have any questions or require additional information, please contract Gloria Greene, Director, Office of Sponsored Programs @ greeneg@uah.edu or (256) 824-2657.

Sincerely,

Rayford B. Vaughn, Ph.D. Vice President for Research



Appendix D: Site Visit Itinerary

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE						
The	The University of Alabama in Huntsville (UAH)					
	NCURA Peer Review Site Visit Itinerary					
Monday,	Review Team Anival:					
October 28, 2013	<u>Huntsville Maniott</u> 5 Tranquility Base · Huntsville, Alabama 35805					
]	NCURA Team – Executive Section (Huntsville Marriott)					
	NCURA Team – Pick-up: Lobby of Marriott, University Transportation will bring the team to the University of Alabama in Huntsville (UAH)					
Tuesday, October 29, 2013	Meeting Location: Von Braun Research Hall (VBRH), Office of The Vice President for Research (OVPR) Conference Room, M17					
8:00-8:45 AM	Entrance Meeting: Dr. Ray Vaughn, Vice President for Research					
8:45-9:45	Ms. Gloria W. Greene, Director, Office of Sponsored Programs					
9:45-10:00	Executive Session					
10:00-10:45	Ms. Denise Spiller, Director, Research Security					
10:45-11:00	Executive Session					
11:00-12:00	Deans and Center Directors-Group A					
	Dr. Caron St. John, Dean, College of Business Administration					
	Ms. Sue O'Brien, Director, Rotorcraft Systems Engineering & Simulation (RSES)					
	Mr. Glenn Dasher, Dean, College of Liberal Arts					
	Dr. Jack Fix, Dean, College of Science Dr. John Christy, Director, Earth System Science Center (ESSC)					
	Dr. Gary Maddux, Director, Systems Management & Production Center (SMAP)					
	Dr. Bob Frederick, Director, Propulsion Research Center (PRC)					
	Dr. Bob Lindquist, Chair, Electrical and Computer Engineering					
12:00-1:00PM	NCURA Team Executive Session – Working Lunch					
1:00-2:30	Office of Sponsored Programs					
	Ms. Mirael Parker-Davis, Contract Assistant IV					
	Ms. Jenni Moody, C&G Coordinator, College of Engineering					
	Mr. Steve Parker, Certified Contract Specialist Ms. Kelly Haas, Contract Administrator					
	Ms. Petra Dotson, Contract Specialist I					
	Ms. Tonia Pitts, Contract Administrator II					
	Ms. Angela Beasley, Contract Administrator I					
	Mr. Mark Massey, Contract Administrator I					
	Ms. Woodonna Deerman, Contract Assistant III					
	Mr. Randy Barbour, Subcontract Metric Analyst					
	Ms. Laurie Collins, Certified C&G Coordinator, College of Science Mr. Scott Sandlin, Government Property Specialist					
	Ms. Susan Phelan, Grant Writer					
2:30-2:45	Executive Session					
2:45 - 3:45	Faculty Senate Group					
-	Dr. Kader Frendi, Professor, Mechanical & Aerospace Engineering Department					





	Dr. Jason O'Brien, Professor, Education
	Dr. Christopher Allport, Associate Professor, Accounting
	Dr. Richard Miller, Professor, Physics
3:45-4:00	Executive Session
4:00-5:00	Senior Faculty and Research Group
	Dr. Sampson Gholston, Associate Professor, Industrial & Systems Engineering
	Dr. Ken Sullivan, Principal Research Engineer IV, RI
	Dr. Keith Hollingsworth, Chair, Mechanical Engineering
	Dr. Monica Dillihunt, Associate Professor, Education
	Ms. Helen Conover, Principal Res Scientist III, ITSC Dr. Richard Tyson, Principal Res Scientist VII, S4, PRC
	Dr. Sundar Christopher, Chair, Atmospheric Science
	Dr. James Hadaway, Principal Res Scientist II, CAO
	Mr. James Clark, Principal Res Engineer, SMAP Center
	Dr. Pat Reardon, Associate Director, CAO
	Mr. Chris Sautter, Principal Res Engineer, RI
	Dr. Karen Frith, Nursing
	Dr. Eric Fong, Associate Professor, Management
	Dr. Emmanuel Waddell, Associate Professor, Chemistry
5:00	University Transportation will return to Hotel Lobby
Day Two NCURA	Peer Review
Wednesday,	NCURA Team – Pick-up: Lobby of Marriott, University Transportation will
October 30, 2013	bring the team to UAH, OVPR Conference Room, VBRH M17
8:00-8:45AM	Mr. Ray Pinner, Vice President for Finance and Administration
8:45-9:00	Executive Session
9:00-9:30	Mr. Robert Leonard, Assoc VP, Finance & Business Services
9:30-10:00	Mr. Chih Loo, Assoc VP, Budgets & Financial Planning (Effort Reporting)
	Ms. Candi Horch, Asst Director, Budgets & Effort Reporting
10:00-10:15	Executive Session
10:15-11:15	Ms. Valarie King, Director, Contracts and Grants Accounting
11:15-11:30	Executive Session
11:30-12:00	Mr. John Cates, General Counsel
	Mr. Bill Woodward, General Counsel
12:00-1:00PM	NCURA Team Executive Session – Working Lunch
1:00-2:00	Deans and Center Directors – Group B
	Dr. Faye Raines, Dean, College of Nursing
	Dr. Sara Graves, Director, Information Technology & Systems Center (ITSC)
	Dr. Shankar Mahalingam, Dean, College of Engineering
	Dr. Steve Messervy, Director, Research Institute (RI)
	Dr. Gary Zank, Director, Center for Space Plasma & Aeronomic Research (CSPAR)
	Dr. Mikel Petty, Director, Center for Modeling, Simulation & Analysis (CMSA)
2:00-2:15	Mr. Jeff Thompson, Director, Center for Management & Economic Research (CMER) Executive Session
2:15-3:15	
2.10-5:10	Center/Department Administrators Ms. Linda Berry, Coordinator, Earth System Science Center
	Mr. Anthony Edmondson, Research Program Coordinator II, PRC
	Ms. Rozella Coggin, Research Program Coordinator II, Rotorcraft Center





	Ms. Joan Sims, Research Associate II, Step 2, SMAP Center
	Ms. Sarita Cochran, Resource Manager, College of Engineering
	Ms. Karen Hancock, Senior Research Program Coordinator, RI
	Ms. Veronica Belser, Resource Manager, CSPAR
	Ms. Gretchen Pangle, Research Program Coordinator, ITSC
	Ms. Jackie Carlson, Administrative Assistant, CAO
	Ms. Tammy Lane, Senior Administrative Assistant, Mathematics
	Ms. Candi Debardelaben, Sr Administrative Assistant, Physical Plant
	Ms. Luolan Huang, Sr Accredited Database Res Coordinator, College of Business
	Ms. Angelia Heulett Staff Assistant, E&C Engineering
	Ms. Cindy Henderson, Administrative Assistant, ESSC Ms. Carol Mueller, Institute for Science Education
3:15-3:30	Executive Session
3:30-4:30	Compliance Oversight Faculty/Staff Group
5.50-4.50	Dr. Roy Magnuson, Chair, IACUC
	Dr. Pam O'Neal, Chair, IRB
	Ms. Marcia Pendleton, Director, Environmental Health and Safety
	Dr. Mike Banish, Radiation/Laser Safety
	Mr. John Cates, University Compliance Officer
	Dr. Tom Koshut, Associate VP for Research
4:30-5:00	Ms. Felecia Troupe, Associate Director, Office of Sponsored Programs
5:00	University Transportation will return to Hotel Lobby
Day Three NCUR	
Thursday,	NCURA Team – Pick-up: Lobby of Marriott, University Transportation will
October 31, 2013	bring the team to UAH, OVPR Conference Room, VBRHM17
8:00-8:45AM	Ms. Tharanee Ravindran, Internal Auditing
8:45 - 9:15	Mr. Bob Lyon, Vice President for University Advancement
9:15-9:30	Executive Session
9:30-10:15	Mr. John Rogers, Senior Information Technology Specialist, OSP
	Mr. Drew Hamilton, Web Coordinator, OSP
10:15–10:30	Executive Session
10:30-11:30	Contracts and Grants Accounting Group
	Ms. Carrie Rice, Accounting Technician
	Ms. Brendella Reddock, Accountant II
	Ms. Resha Diamond, Accountant I
	Ms. Diluni Rupasinghe, Accountant II
	Mr. Jeremy Prater, Accountant I
	Ms. Maria Anna Alindogan, Manager, C&G Accounting
	Mr. Nedric Jones, Accountant II Ms. Tessa Brown, Accountant II
11:30-11:45	Executive Session
11:45-12:00	Dr. Brent Wren, Associate Provost
11.45 - 12.00	Dr. Dave Berkowitz, Dean, Graduate Studies
12:00-1:00PM	NCURA Team Executive Session – Working Lunch



THE UNIVERSITY OF	
ALABAMA IN HUNTSVILLE	
1:00-2:00	Junior Faculty and Research Staff Group
	Dr. Phillip Bitze, Assistant Professor, Atmospheric Science
	Dr. Jim Adams, Principal Res Scientist IV, S2, CSPAR
	Dr. Gabe Xu, Assistant Professor, Mechanical Engineering
	Dr. George Nelson, Assistant Professor, Mechanical Engineering
	Dr. Luciano M. Matzkin, Assistant Professor, Biological Science
	Dr. Kenneth Leppert, Research Associate II, S3, ESSC
	Dr. Samaiyah Farid, Research Scientist I, S1, CSPAR
2:00-2:15	Executive Session
2:15-3:00	Open, Call-back time
3:00-3:30	Executive Session, Final Exit Meeting Report-out Preparation
3:30-5:00	*Exit Meeting
	Dr. Ray Vaughn, Vice President for Research
	Mr. Ray Pinner, Vice President for Finance and Administration
5:00	University Transportation will return to Hotel Lobby
	Confirm Hotel Shuttle Transportation to airport on 11/1/13
Friday	NCURA Peer Review Team
Nov 1, 2013	Hotel Shuttle to Huntsville International Airport

* May run a little late for exit meeting. Mr. Pinner and Dr. Vaughn have a UAH Foundation Board Meeting from 2 to 4 on the 31st



Appendix E: NCURA Resources

supporting research...together

National Council of University Research Administrators First and Largest Association for Research Administration Entertrinked 1959

Who are Research Administrators and What is NCURA?

The research administrator works with dedicated and brilliant researchers and scholars who often are on the cutting edge of their field and with the U.S. government and private sponsors that require stewardship for the funding they provide. NCURA is the professional home to 7,000+ research administrators and we foster in novative and collaborative education and networking as we support research ... together.

NCURA HOSTS 3 NATIONAL MEETINGS A YEAR

ANNUAL MEETING OF THE MEMBERSHIP

NCURA

The annual meeting of the membership is held in August each year in Washington, DC Over 2,000 of our 7,000+ members attend

> We begin with a full day of workshops and senior level seminars which are a supplemental training program open to all registrants of the annual meeting. This in-depth, targeted training and professional development includes offerings for those new to the profession to our most senior level members.

We then embark on two and a half days

of presentations, discussions, open forums and networking opportunities spanning all areas of research administration including, but not limited to, Pre-Award, Post-Award, Compliance, Departmental, Intellectual Property, Contracts, International, Predominantly Undergraduate Institutions, Electronic Research Administration, and Medical Center/Hospital Issues. Attending the annual meeting gives our members the opportunity to participate in sessions over a full range of topics to support their need for information in a variety ofareas

This annual reunion of the membership also includes our Sunday dinner, Tuesday evening event, dinner groups, regional networking events and numerous volunteer activities that create the opportunities for you to meet and connect with your colleagues and create your peer network.

In addition to the education and networking opportunities the annual meeting of the membership provides, our sponsor and exhibitor partners will be available to share information on the products and services to support you and your institution.

AT FINANCIAL RESEARCH ADMINISTRATION (FRA)

The community of those engaged in the financial administration for research was brought together in 2000 for a special topic conference on post-award issues. This community has come together each year since then for their own conference which has grown from 300 participants in the year 2000 to over 1,100 in 2013.

This conference travels to a new location each year and is held between February and late March. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.

A PRE-AWARD RESEARCH ADMINISTRATION (PRA)

In 2006, the NCURA Board of Directors unanimously agreed to offer a Pre-Award Research Administration (PRA) Conference.

The vision for this conference is to create an annual PRA Conference complementing the existing FRA (Financial Research Administration) annual conference.

This conference of over 500 participants travels to a new location each year and is held back to back with the FRA conference noted above. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.



"NCURA keeps you one step ahead of the curve."

Tom Wilson, Assistare Vos President/ ier Rassarch Administration i Universit



Immersion Education

NCURA offers 4 different workshops that are each 2 ½ days and travel around the country throughout the year. And, with a commitment of 60 participants, NCURA can bring one of these 4

© FUNDAMENTALS OF SPONSORED

PROJECT ADMINISTRATION Individuals involved in sponsored projects administration are faced with a multitude of challenges: becoming knowledgeable about federal regulations and individual agency requirements, providing assistance to faculty, gathering information, administration of awards, and many other tasks. The purpose of this program is to provide participants (this program is intended primarily for the newcomer – less than 2 years experience) with a broad overview of the various aspects involved in sponsored projects administration, including preparation and review of proposals, negotiation and acceptance of awards, financial and administrative management, closeout and audit, as well as the relevant compliance issues.

CRITICAL ISSUES IN RESEARCH ADMINISTRATION (SPA II)

For more experienced research administrators, NCURA created "Sponsored Project Administration: Level Two, Critical Issues in Research Administration" (commonly referred to as "SPA II"). This program offers participants an opportunity for in-depth instruction in four core aspects of research administration: institutional compliance responsibilities, proposal creation and submission, contract and subaward review, and post award financial administration. Each of these topics will be explored through a combination of case study analysis and discussion.

FINANCIAL RESEARCH ADMINISTRATION WORKSHOP (FRA)

The Financial Research Administration Workshop focuses primarily on the financial aspects of research administration. This workshop provides an in-depth look at financial compliance issues through a combination of lecture, case studies, review of Federal audit reports, and a discussion of best practices. The workshop presents the financial issues of sponsored programs management using a 'cradle-to-grave', award lifecycle approach, and discusses the impact of the financial issues at each stage of award management.

DEPARTMENTAL RESEARCH ADMINISTRATION WORKSHOP (DRA)

Administrators who work at the department and college level have unique challenges. Like central offices, we must have the knowledge of pre- and post-award functions. What distinguishes the departmental research administrator from other research support functions is being intimately involved with all facets of the administration process, daily interaction with facuky, as well as other departmental-specific responsibilities.

This program examines the foundations of research administration in the context of departmental administration – the transactional level. The program will concentrate on applying best practices to a department administrator's day-to-day activities.

CONSTRUCTION: STATION: STATION

"We are, in Qatar University, very pleased to be the first institution in which to hold NCURA's International workshop outside the States. Our experience with you was wonderful and fruitful, and the feedback we are receiving from participants proves the success of the workshop."

> Dr. Mournen O. Hasnah Associate Professor of Medical Physics Director, Office of Research Qatar University

For information on how you can bring this workshop to your country, please send your request to NCURAglobal@ncura.edu



Education when you want it

NCURA 8 WEEK ONLINE TUTORIALS -LEARN AT YOUR OUR PACEI

These primers are intended for those new to each area, or who have had very limited exposure.

Primer on Clinical Trials

We have developed a thorough overview of this complex process. The course will focus on key administrative, financial, and regulatory issues that arise in planning, funding, conducting, and closing-out clinical trials.

Primer on Federal Contracting

Since Federal contracts are very different from federal grants, we have developed a thorough overview of this complex process.

Primer on Subawards

This online tutorial is focused on subcontracting programmatic effort under federal grants and other financial assistance awards. "Subcontracting" and "third party agreements" cover a wide variety of activities. The course has been divided into a series of lessons that deal with aspects of the subaward crucial to the Research Administrator.

Primer on Intellectual Property in Research Agreements

This online introductory course in intellectual property is designed for university personnel working in contracts and grants, sponsored research and technology transfer offices. Its goal is to provide a basic background in issues of intellectual property management, and practice in analyzing and drafting research and licensing agreements.

VOUTUBE TUESDAY

NCURA produces 2-3 minute videos on diverse research administration topics and posts them on our YouTube channel each Tuesday. Institutions are welcome to use these videos in their on-campus training programs. With over 400 subscribers and over 120,000 views on the channel since its July 2011 inception, this is a resource we encourage you to check out! Find us at http://www.youtube.com/user/ncura1959

WEBINARS

These 90 minute online events are five with opportunities to ask the presenter(s) your questions. The audio is delivered directly to you over the telephone to provide clear, refable sound quafty.

Invite as many people for one low price. For large groups, use a speakerphone to deliver the audio and a projection system to deliver the web component.

Each site ficense includes:

- One set of materials. (The person who registers for the event receives the materials by email and may make copies for those who attend.)
- · One toll-free telephone connection to the event.
- One Internet connection to the event for the web component.

After the live date, the webinars are also available for purchase as a mp3 download or CD-Rom. Topics have included:

- · Subrecipient Monitoring
- · The Daily Management of Awards
- · Making FFATA Transparent
- How Fraud Happens and How You Can Protect Your Institution
- Managing Effort: Truth or Consequences
 Negotiation Tools and Tactics for the Research Administrator

C NCURATY LIBRARY

All programs are DIRECT-TO-DVD which means you and your staff can schedule your training whenever you want it.

NCURATV is still the most COST-EFFECTIVE way to train your entire staff. Registrants are also granted a license to reproduce each program for use on campus at any time.

These 2-3 hour programs include the following topics and more!

- Technology Transfer Issues for the Research Administrator
- Export Controls and Other Security Concerns
 It Takes a Village to Manage Awards:
- Post-Award Issues for Pre-Award & Departmental Administrators ABC's of the Federal Cost Principles
- Managing Interactions and Potencial Conflicts with University Spinoffs and Other Small Businesses for the Department Administrator
- Negotiating Federal Contracts and Pass-through Awards





Programs and Resources

NCURA COMMUNITY -COLLABORATEI

NCURA's professional networking platform, Collaborate, hosts online topical communities such as: Pre-award, Post-award, Electronic Research Administration, Compliance, Predominantly Undergraduate Institutions, International and Departmental. The communities host chats, interviews, fist servs and resource pages for each area. This is a great way to stay connected and even to volunteer while being home on your campus.

FELLOWSHIP PROGRAM

The Fellowship program has two underlying objectives: (i) the training of research administrators, and (ii) enhancing U.S. and foreign research collaboration. This program is intended to reduce barriers to international research administration and create an administrative environment conducive to international collaboration.

The program will provide an opportunity for U.S. research administrators to travel to research organizations abroad and immerse themselves in a program of mutual learning and knowledge exchange.

PEER REVIEW PROGRAM

The NCURA Peer Review Program is a powerful tool for enhancing your sponsored programs operations. This review is available to all NCURA members. The completely confidential peer review is conducted by a team of nationally recognized research administrators who thoroughly review the sponsored programs area. The review utilizes National Standards that represent the core and vital functions of sponsored programs-regardless of size and type of institution.

At the completion of the evaluation, the institution receives a detailed confidential report that provides valuable feedback addressing program strengths and areas for improvement.

Support your commitment to providing a high quality sponsored programs operation by having an NCURA Peer Review.

VICURA MAGAZINE

NCURA's magazine is published six times a year with cutting edge pieces on management, perspectives on federal policy written by members and non-members, and the latest information and explanations on topics of interest to research administrators.

RESEARCH MANAGEMENT REVIEW – NCURA'S SCHOLARLY JOURNAL

As the scholarly journal for the National Council of University Research Administrators, the RMR is concerned with the broad range of issues affecting the administration of research and the changing research environment at the national and international levels. The RMR provides a forum for the dissemination of knowledge about the study and practice of the research administration profession

NCURA MICROGRAPHS, MONOGRAPHS AND LIVING TEXTBOOKS

- · A Primer on Clinical Trials
- · A Primer on Intellectual Property
- Cost Accounting Standards
- · Cost Sharing: An Overview
- · Effort Reporting: An Overview
- Establishing and Managing an Office of Sponsored Programs at Non-Research Intensive Colleges and Universities
- Facilities and Administrative Costs in
- Higher Education The Role of Research Administration,
- Second Edition
- Writing and Negotiating Subawards Under Federal Prime Awards
- OMB Circular A-21 Mini-Guide
- OMB Circular A-133 Mini-Guide
- · OMB Circular A-110 Mini-Guide
- Regulation and Compliance: 2011
- Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices

Visit NCURA's Online Store @ www.ncura.edu to purchase any of these publications.

Information on all of NCURA's programs, services and educational materials can be found on our website at: WWW.NCURA.EDU

NATIONAL COUNCIL OF UNIVERSITY RESEARCH ADMINISTRATORS 1015 18th Street, NW, Suite 901 | Washington, DC 20036 +1202.466.3894 | Fax +1202.223.5573 | Info@ncurs.ada | www.ncurs.ada



Appendix F: Staff Roles and Responsibilities

https://www.rsp.wisc.edu/policies/staffroles.html

Staff Roles and Responsibilities

	PI/Chair	Dean/Designee	RSP
Proposal Submission			
Encouraging the pursuit of extramural funding and identifying funding opportunities	1	r	
Provides institutional leadership through ongoing training and advising to assure the University's continuing success in obtaining funding and managing sponsored projects.			×
Identifies databases of grant information and makes them available to the University community			X
Works with faculty and staff to match funding opportunities with sponsored projects		x	
Identifies extramural funding opportunities	x		
Proposal Preparation			
Prepares technical proposal	x		
Assures that the proposed project is appropriate in nature and scope and consistent with the departmental and institutional mission	×		
Assures that the proposed project has qualified personnel and adequate space	x		
Develops an adequate and accurate budget to accomplish the scope of work	x		
Requests and documents approval for cost sharing/matching funds as required	x		
Approves and provides documentation to RSP for cost sharing/matching		x	
Norks with Purchasing to develop Small Business/Minority Subcontracting Plans as required	x		
Submits Small Business/Minority Subcontracting Plan			х
Routes proposal for campus approval, allowing sufficient time for review before submission to meet the ponsor's deadline	x		
Provides general oversight for sponsored project proposals, including budget review		x	
Approves F&A (indirect cost) waivers			х
Prepares final version of the approved proposal and multiple copies as required by sponsor	x		
Submits all proposals on behalf of the University as designated by Board of Regent's policy			х
dentifies change in sponsors' terms and conditions for grant administration and notifies the University community			x
legotlates material transfer agreements (MTAs)			х
legotiates agreements for clinical trials			х
Prepares and negotiates the F&A (indirect cost) proposal and negotiates final rates			х
faintains a proposal database			х
Regulatory Compliance			
(pproves project PI status (as delegated)		x	ĺ.,
repares and submits protocols for research involving human subjects, research animals and biosafety azards	x		
ferifies submission of protocols to appropriate committee for research involving human subjects, esearch animals and biosafety hazards		x	
ssures and provides documentation of certifications and representations to sponsor (For approval of esearch involving human subjects, research animals and biosofety hazards. This occurs following omnittee approval.)			x
ssures compliance with federal regulations regarding financial disclosure of potential conflicts of terest			x
Brant and Contract Awards			
ietting-up the Award Account			
ccepts awards on behalf of the Board of Regents			x
egotiates terms and conditions relating to University policies (includes sovereign immunity, idemnification, publication restrictions, transfer of data ownership, jurisdiction outside of Wisconsin, inding arbitration, certificate of Insurance, classified research, appropriate indirect cost rates, audit equirements, payment terms and schedules, report forms, financial report schedules, and level of etail, patents and copyrights.)			x
grees to all terms and conditions, with emphasis on performance clauses. Includes frequency of chnical reports, special professional staff hourly reports, deliverables, termination conditions, etc.	x		
repares and sends gift acknowledgement letters as required	Χ.		
evelops and administers agreements			x



https://www.rsp.wisc.edu/policies/staffroles.html

Managing the Award			
Assures appropriateness, reasonableness and allowability of expenditures	x		
Manages expenditures to not exceed available award balance	x		0.00
Provides oversight of sponsored project administration, including cost transfers and Effort Statements		х	
Reviews expenditures in certain restricted budget categories			x
Reviews and signs Effort Statements in ECRT as required	x		
Manages the Effort Reporting (ECRT) System		22412.272.072.072.072.072.072.072	x
Initiates requests for rebudgeting and cost transfers	x		
Reviews and monitors cost transfers			x
Reviews and processes non-monetary modifications (substantial changes should be routed for approval through the Dean's office)			×
Approves substantive modifications and rebudgeting		х	
Approves payment of subcontractor invoices	x		
Assures timely resolution of overdrafts and revenue shortfalls		х	
Draws funds on letters of credit and reconciles accounts as required			x
Works with Dean or Department Chair on clearing overdrafts and revenue shortfalls			X
Reporting and Close-Out			
Prepares technical reports and provides other deliverables as required	x		
Reviews Interim financial reports provided by RSP as required	x		
Documents cost sharing/matching funds as required	x	24.5. Kod	
Provides final accounting of cost sharing/matching to RSP		х	
Prepares and submits to sponsor financial reports and invoices as required			×
Participates in negotiations when technical reports are incomplete and deliverables are lacking or unacceptable to the sponsor		х	
Files appropriate close-out documents		where excitation i	x
Maintains award database			x

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