

Great Minds:
Brainstorming &
Benchmarking with
COGR Member
Institutions

June 6, 2024

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Great Minds: Brainstorming & Benchmarking with COGR Member Institutions

June 6, 2024

Session Moderated By:

COGR Directors:



David Kennedy, *Director,
Costing and Financial
Compliance (CFC)*



Krystal Toups, *Director,
Contracts & Grants
Administration (CGA)*



Kristin West, *Director,
Research Ethics &
Compliance (REC)*



Robert Hardy, *Director,
Research Security &
Intellectual Property (RSIP)*

COGR Committee Chairs:



Sarah Axelrod, *Asst. VP,
Sponsored Programs, Harvard
University (CFC Chair)*



Jeffrey Friedland, *Assoc. VP for
Research, U. Delaware (CGA
Chair)*



Deborah Motton, *Exec.
Director, Research Policy
Analysis & Coordination, UCOP
(REC Chair)*



Jennifer Ponting, *AVP, Research
Administration, U. Chicago
(RSIP Chair)*

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Two ways to participate:

Poll Everywhere: *Answer Poll Q's & Ask Questions*

Step Up to the Mic! *Priority will be given to those at the mic.*

Want to Continue the Conversation?

Lunch seating is open in West End, Dupont, and Metropolitan Ballrooms.

- **West End Ballroom:** Research Security Topics
- **Metropolitan Ballroom (You Are Here):** Costing Topics
- **Dupont Ballroom:** Additional Topics (Including Tech Transfer)

Research Security

Kris West, Director, kwest@cogr.edu
Research Ethics & Compliance Committee

In response to the Dept. Of Energy's Order 1423(b) Change 1 on the Unclassified Foreign National Access Program are institutions considering participation restrictions?

A. Yes

B. No

2. If an exemption to Section 142.3(b) applies, how are institutions documenting this if the clause remains in the contract?

A. Internal documentation

B. Seeking written confirmation from DOE that an exemption applies

C. Other – Come to the mic and discuss

For Discussion

- If Order 142.3 (b) applies and DOE is requested to approve a request that a foreign national have access to specific sites, information or technologies, how are institution's dealing with DOE's lack of action (i.e., DOE does not respond for a long time)?

If your institution has a DOE award/agreement with the Transparency of Foreign Connections clause are you requiring the members of your Board of Trustees to provide this information (e.g., citizenship, shareholder affiliation)

- A. Yes
- B. No

How are institutions that don't yet meet the NSPM-33 \$50 million threshold for security programs keeping track of when they are close to the threshold?

- A. Relying on federal data. If so, come to the mic to discuss what data you are using.
- B. Relying on internal data.
- C. Relying on a combination of internal and federal data.
- D. Other – Please come to the mic and discuss.

What process is your institution using to comply with prohibitions on covered individuals participating in MFTRPs per the CHIPS Act?

- A. We require covered individuals to sign a certification directed to the institution.
- B. Our audit and/or compliance office are doing compliance reviews or audits to verify compliance.
- C. Both A and B.
- D. Other – please come to the mic and discuss.

What processes are institutions putting in place to address NSPM-33's international travel requirements?

- A. Requiring all international travel associated with a federal grant/contract or institutional activity registered with and/or approved by the institution prior to travel.
- B. Requiring that all international travel associated with a federal grant/contract is registered and/or approved by the institution prior to travel.
- C. Nothing yet -- we are waiting for the final security standards.
- D. Other - Please come to the mic to discuss.

What are you advising your researchers about co-authorships and collaborations with individuals and entities on the BIS and 1286 lists?

- A We advise that these collaborations may negatively impact their ability to receive federal funding.
- B. We provide general information about funding agency concerns re. Collaborations with persons/entities of concern.
- C. We are addressing on individual basis as issues arise with specific researchers.
- D. Other – Come to the mic and discuss

Background to Question on CHIPS Funding

- For organizations receiving CHIPS funding, the CHIPS Security Guardrails include a prohibition on joint research with a foreign entity of concern that relates to a technology or product that raises national security concerns, unless the joint research is memorialized in a required agreement upon award acceptance. However, the Guardrails do not specify that the prohibition only applies to sponsored research.

How are institutions ensuring that they have accounted for any ongoing joint research or future research to which this prohibition applies?

- A. We have a process for screening all proposed research projects before we undertake the project.
- B. We are educating researcher on these requirements.
- C. A and B
- D. Other – Come to the mic and discuss

Costing

David Kennedy, Director, dkennedy@cogr.edu

Costing & Financial Compliance

Issue:

“The postaward folks are concerned about the huge burden caused by giving permission for administrative close-out to hit the accounts. It implies creating new controls. It was already problematic to get everything reconciled. We cannot do all invoices and reports the same day and so try to complete early, but now it will be harder to resolve and finish.”

Will the requirement to obtain permission for administrative close-out change practices at your institution?

- A. Yes
- B. No
- C. Don't know

Issue:

“If anyone is considering budgeting closeout costs, as allowed by the revamped Uniform Guidance, how will you budget for them?”

If a research team on a research project are all remote staff, what F&A rate are you using for that project?

- A. On-campus
- B. Off-campus
- C. Some kind of hybrid
- C. Don't know

Has your institution switched from effort reporting to salary confirmation?

- A. Yes
- B. No
- C. Don't know

For institutions that have switched to salary confirmation, has your associated workload decreased?

- A. Yes
- B. No
- C. Don't know

Does your institution monitor effort commitments against the actual effort charged to federal awards?

- A. Yes
- B. No
- C. Don't know

Does your institution have a formal policy covering the cost of scholarships and student aid costs on sponsored awards (UG 200.466)? (In particular, a policy that addresses tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work?)

- A. Yes
- B. No
- C. We include allowable tuition remission in our fringe benefits rates
- D. Don't know

For Discussion:

“How is your institution handling.... Cash or cash equivalent (i.e. gift card) incentives for participation in an approved event/activity as established by the Sponsoring Agency. Are there any limits/restrictions on the amount? Are there any restrictions on employee participation? How is the participant's tax information collected? And, what do you do if there is an anonymity clause/statement to consider?”

Technology Transfer

Robert Hardy, Director, rhardy@cogr.edu

Research Security & Intellectual Property

Issue

“For foreign gift reporting (e.g., Section 117, CHIPS Act reporting requirement to NSF) how do you handle the "contract end date field" for contracts that do not have a specified end date (e.g., IP license to foreign entity, ongoing relationship with foreign patent law firm)?”

How do you handle this?

- A. We provide an approximate end date.
- B. We enter N/A
- C. Other – come to the mic and discuss

In the past year, have you seen OTAs/OTRs with non-standard IP terms (i.e., different from Bayh-Dole) from any of the following agencies (choose all that apply):

- A. ARPA-H
- B. NIH ARPA-E
- C. DOE DARPA
- D. DOD
- E. Other –please come to the mic to discuss
- F. None of the above.

Additional Topics

Krystal Toups, ktoups@cogr.edu

Director, Contracts & Grants Administration

Does your institution's Sponsored Programs Office and Purchasing Office have a well-defined collaboration process to flow down terms for applicable service agreements (ex., OTAs or federal contracts)?

- A. Yes
- B. No

Issue:

Does your institution have a formal policy covering the cost of Scholarships and Student Aid costs on sponsored awards (UG 200.466)? particularly a policy that addresses "tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work"?

Does your institution have a formal policy on this?

- A. Yes
- B. No
- C. We include allowable tuition remission in our fringe benefits rates.
- D. Don't know

If yes, how does your institution comply with the requirement that the charges for tuition remission and other forms of compensation paid to students as, or instead of salaries and wages are subject to the reporting requirements in 200.430?

- A. We include the tuition remission on Effort Reports/Compensation verification processes.
- B. The amount of tuition that can be paid from the grant must correlate to the percentage of work effort the student is assigned to provide on the grant, and when the payroll effort is certified, the tuition percentage is also implied as approved.
- C. Don't know

Who at your institution is typically listed in Element 6 (Oversight of Data Management and Sharing) as responsible for Plan oversight?

- A. Principal Investigator
- B. Library
- C. A Central Office (Sponsored Projects or Compliance)
- D. Data (Management) Office
- E. Research Office
- F. Other

What processes are institutions implementing to approach monitoring and oversight of DMS Plans?

- A. Internal audit/quality assurance programs (e.g., periodic reviews, sampling, etc.)
- B. Project reporting (e.g., confirmation of data depository)
- C. PI Attestation
- D. Other – come to the mic to discuss

What type of resources have been designated for this function?

- A. Personnel/staff
- B. Technology/System
- C. Under evaluation
- D. No new resources (we're managing with existing resources)

How does your institution handle USDA NIFA 2018 Farm Bill indirect cost limitations when subrecipients are involved? As the PTE do you:

- A. Calculate and use a special rate for each proposal/award
- B. Use one rate for every proposal/award to streamline processing.

Do you use AI software for Research Admin.?

- A. Yes
- B. No
- C. We are considering it

If yes, in what ways is your institution using AI for research administration?

- A. Contracts review
- B. Proposal Development (FOA review, budget development, etc.)
- C. Reporting
- D. Research Security, etc.
- E. Other – please come to the mic to discuss

If your institution uses AI software in research administration, can you briefly describe how it's used? (Hint: The mic is also open!)

How are institutions (not under a state-mandated restriction) addressing the TikTok/Byte Dance prohibition for federal contracts?

- A. Campus-wide ban
- B. Tailored restrictions (per contract terms)
- C. Other – come to the mic to discuss

Does your institution have a formal research administration training program?

- A. Yes
- B. No

If yes, is it a certificate program?

- A. Yes
- B. No

How are institutions interpreting “otherwise disciplines” when it comes to NIH harassment/work environment reporting requirements?

- A. Formal disciplinary action
- B. Any disciplinary action at any level (Dept., School, etc.)
- C. Actions along the lines of the way NSF defines “administrative action”
- D. Other – come to the mic and discuss