2016

Day 1 - Proposal Review 101: What You Need to Know to Be a Pre-Award Research Administrator

Brigette Pfister

PROPOSAL REVIEW 101:

What You Need to Know to Be a Pre-Award Research Administrator

YOUR FACILITATOR FOR TODAY:

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LEARNING OBJECTIVES

• Identify and develop crucial skills for the pre-award research administrator.

• Plan your own professional development related to the crucial skills identified.

• Review proposals for compliance with applicable rules, regulations, laws, and policies.

• Communicate effectively with faculty on policy and regulatory issues.

• Prepare proposals for submission with a minimum of problems or stress.

AGENDA

- Sponsored Program Basics
- How Pre-Award Works
- Crucial Skills for Pre-Award Research Administrators
- Rules and Regulations
- How to Review a Proposal
- Budgets
- Communicating with Faculty

SPONSORED PROGRAM BASICS: GRANTS VS. GIFTS

Sponsored Program

- There is a *quid pro quo*
- Deliverables are required
- F&A (indirect) costs are provided by sponsor policy
- Official acceptance is required
- Specific time frame
- Application is in response to a solicitation

Gift or Donation

- No exchange of mutual consideration
- Funds are irrevocable
- "Donative intent" is clearly implied
- Acceptance does not require the University to change magnitude or direction of its current efforts

Image courtesy of University of Delaware

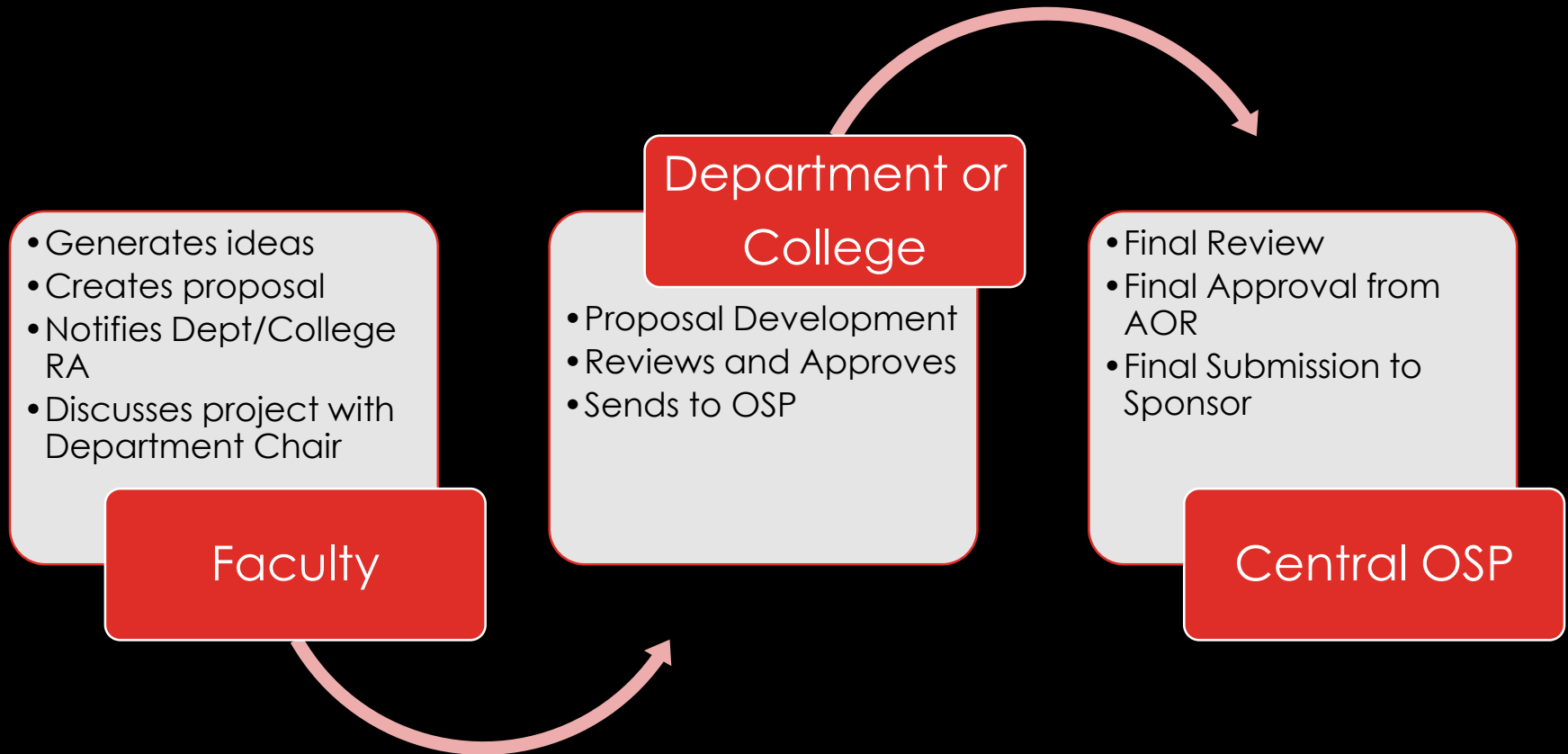# SPONSORED PROGRAM BASICS: PRE-AWARD VS. POST-AWARD

Pre-Award

- Proposal Preparation
- Proposal Budgeting
- Proposal Submissions
- Award Negotiations
- Revisions
- Continuations
- No-Cost Extensions
- RPPRs and Progress Reports

Post-Award

- Account Setup
- Day-to-Day Accounting
- Invoicing
- Financial Drawdowns
- Financial Reporting
- Effort Reporting
- Closeout

HOW PRE-AWARD WORKS

Faculty
- Generates ideas
- Creates proposal
- Notifies Dept/College RA
- Discusses project with Department Chair

Department or College
- Proposal Development
- Reviews and Approves
- Sends to OSP

Central OSP
- Final Review
- Final Approval from AOR
- Final Submission to Sponsor

PRE-AWARD TIMELINE FOR REVIEW

- How long does a good pre-award review take?

- How many proposals can each individual handle at once?

- How is your workload divided?

- How experienced is your team? Your faculty?

- Insufficient lead time is THE #1 stressor of research administrators!

- The answer: Your Timeline Policy!

Time Is Money
How much is your time worth?

COMMON PRE-AWARD PITFALLS

- Insufficient lead time
- Insufficient training
  - Research administrators
  - Faculty
  - Department staff
- Poor business practices
  - Inefficiencies
- Ill-defined institutional policies

- Missing documentation
  - Subaward materials
  - Consultant letters
- Principal Investigators
  - If they didn't read the sponsor guidelines…
  - If they're indecisive
  - If they waited to start writing until deadline week…

CRUCIAL SKILLS FOR RESEARCH ADMINISTRATORS

- Reading Comprehension
- Critical Thinking
- Filtering the Important from the Noise
- People Skills
- Judgment
- Computer Skills
- Math

- Communication
- Time Management

DEVELOPING YOUR SKILLS

- Overall:
  - Practice, Practice, Practice!
  - Listen and Learn
  - Take Advantage of ALL Available Training
    - Including CITI, Responsible Conduct of Research, etc!
  - Ask to Sit in at Meetings

- Find a Mentor
  - Someone who has already been where you want to go
  - Someone respected in the field
  - Someone who you get along with and enjoy talking to

HOW TO REVIEW A PROPOSAL: WHAT YOU NEED TO KNOW BEFORE YOU START

Rules & Regs Before 12/26/14

- 2CFR220 Cost Principles for Educational Institutions
    - Formerly OMB Circular A-21
- 2CFR215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
    - Formerly OMB Circular A-110
- OMB Circular A-133 Audits of States, Local Governments, and Non-Profit Organizations

Rules & Regs After 12/26/14

- 2CFR200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
    - Also known as:
        - Uniform Guidance (UG)
        - OMB-zilla
        - A-81

HOW TO REVIEW A PROPOSAL: WHAT YOU NEED TO KNOW BEFORE YOU START

- Cost Accounting Standards
  - CAS 9905.501 Consistency in Estimating, Accumulating, & Reporting Costs
  - CAS 9905.502 Consistency in Allocating Costs Incurred for the Same Purpose
  - CAS 9905.505 Accounting for Unallowable Costs
  - CAS 9905.506 Cost Accounting Period

Rules and Regulations: Federal

- Human Subjects
  - Belmont Report: Ethical Principles and Guidelines for the Protection of Human Subjects of Research
  - 45CFR46: Basic HHS Policy for Protection of Human Research Subjects

- Animal Care and Use
  - HEALTH RESEARCH EXTENSION ACT OF 1985 PUBLIC LAW 99-158
  - Animal Welfare Act

RULES AND REGULATIONS: FEDERAL

- Intellectual Property
  - [Overview](#) from Sanford Encyclopedia of Philosophy
  - [Bayh-Dole Act, P.L. 98-620](#)

- Export Control
  - [International Traffic in Arms Regulations](#) (ITAR)
  - [Export Administration Regulations](#) (EAR)
  - Office of Foreign Assets Control Regulations (OFAC) [OFAC website](#)

RULES AND REGULATIONS: STATE

- Each state has its own set of rules and regulations
- These may be different from the federal regulations

THE STRICTER RULE APPLIES

RULES AND REGULATIONS: YOUR INSTITUTION

- Your Institution's Policies
    - Faculty effort on research projects
    - Course release
    - Cost sharing and matching
    - Timeline for review
    - F&A Rate Agreement/Fringe Benefits
        - Use of off-campus rates

…and more

HOW TO REVIEW A PROPOSAL

- Gather Materials
    - Sponsor Guidelines
    - Proposal Documents
    - HR information on the PI and other participants
    - Sponsor Forms and Templates
    - References (2CFR200, institutional policies, etc)
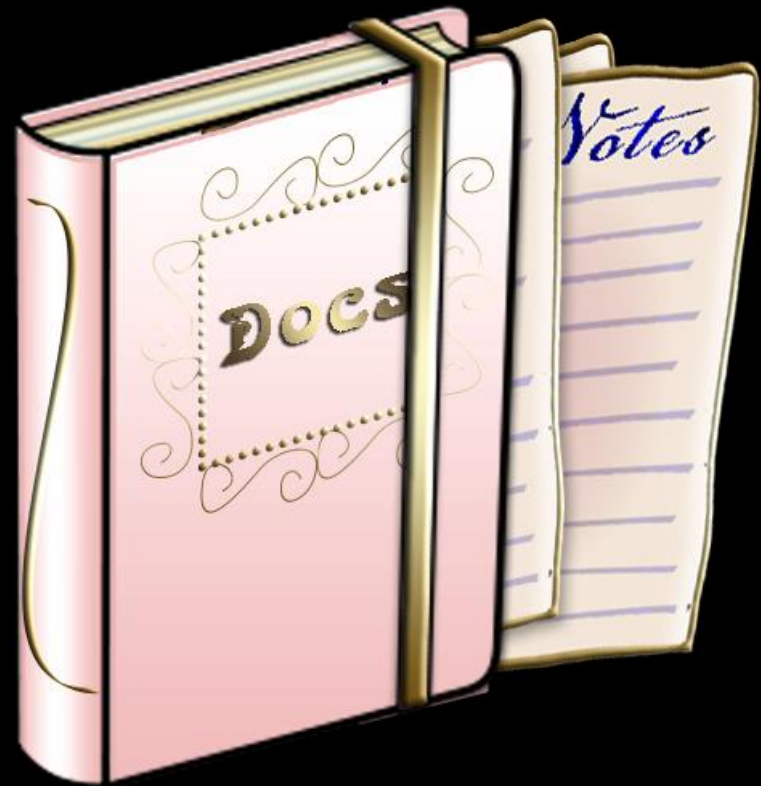
- Start a Notes File or Comment Log

- Use a File System that works for you
    - Keep everything together
    - Make it difficult to lose things

READ THE SPONSOR GUIDELINES

- The #1 rule: RTFM
  "Read the Fine Manual!"
- Why?
  - It tells you exactly what the sponsor is looking for
  - The PI may not have read it or may not understand it
  - If the proposal is not compliant, it will not be reviewed

- You will need these skills:
  - Reading Comprehension
  - Critical Thinking
  - Filtering the Important from the Noise

READ THE SPONSOR GUIDELINES

- Look For:
  - Eligibility rules
  - Deadlines
  - Funding Restrictions
    - F&A costs
    - Funding minimums or maximums
    - Budget categories the sponsor will not fund
  - Terms and conditions
  - Contract language

- Ask Yourself:
  - Is my institution eligible?
  - Is this a good fit for the PI's research?
  - Is this a good fit for my institution?
  - Are there other documents I need to review?
    - NSF, NIH, USDA, and others have additional info available!

OUR FORMS, OUR LIVES

- Internal Forms
  - RAMS-SPOT
  - Clinical Research Documentation
  - Internal Budget Worksheets
- Sponsor Forms
  - SF424
  - FastLane Forms
  - Sponsor-Specific Forms

REVIEW THE NARRATIVE MATERIALS: LOOK FOR..

- Format
  - Does it meet the specifications in the guidelines?
  - Are all of the documents present?
  - Are all of the subject areas addressed?
  - Suggest using the guidelines as a template!

- Organizations or people named as partners
  - Are they receiving funds? Endorsing the project?
  - Depending on involvement, you may need a letter from them!

REVIEW THE NARRATIVE MATERIALS: LOOK FOR..

- Implied Cost Share
  - "Dr X will spend 15% of his time on this project" when there is no effort in the budget
  - "We will leverage $50,000 for this project in the form of volunteer time…"
  - All cost share must be documented in the budget!

- Hidden Commitments
  - "New lab space!" probably needs to be vetted with the department chair first!

- Typos, Grammatical Errors
  - Yes, PhDs make them all the time
  - Yes, you should say something

REVIEW THE NARRATIVE MATERIALS: LOOK FOR..

- Human Subjects:
  - Medical procedures
  - Psychological testing or treatment
  - Surveys
  - Focus Groups
  - Using human tissue or cells: make sure you know where it's coming from!

- Animal Care and Use:
  - Vertebrate animals
    - Anything with a spine
    - Kittens, puppies and fluffy bunnies count!
    - Insects do not count!
  - Not just lab animals– some studies involving observation of wildlife must be reviewed, too!

REVIEW THE NARRATIVE MATERIALS: LOOK FOR..

- Hazardous Materials:
  - Radioactive Materials
  - Recombinant DNA
  - Biohazards
  - Select Agents
  - Pathogens
    - Viruses
    - Some bacteria, etc

- Any point in which the proposal narrative strays from the focus suggested by the guidelines
  - Is the project a good fit?
  - If not, is there another opportunity that would be better?

WHAT IS A BUDGET?

- The financial story of your project

- Two parts:
  - Budget form
    - Itemized list of costs
  - Budget narrative
    - Description of costs
      - How they were calculated
      - Why they are important
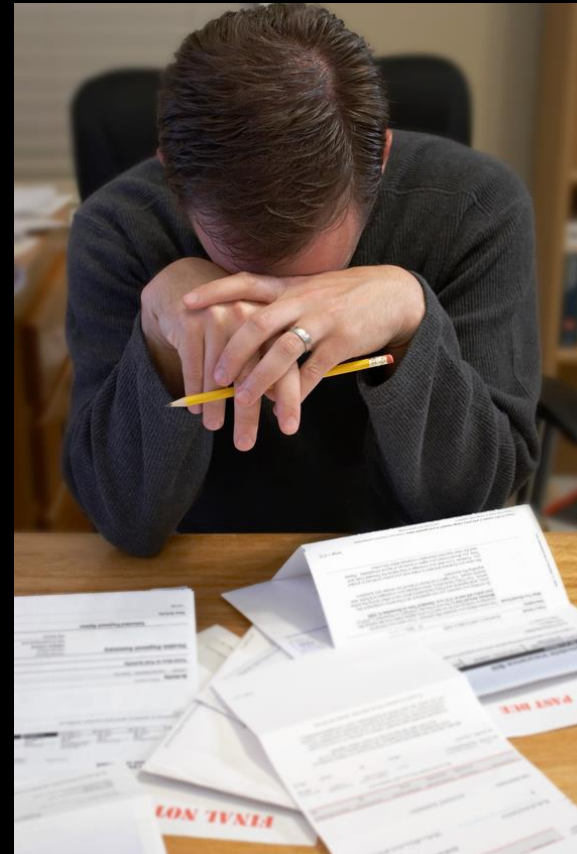
REVIEW THE BUDGET: LOOK FOR...

- Check all calculations
- Pay special attention to F&A calculations
- Make sure the numbers in the budget narrative match those on the budget forms
- Make sure all items of cost are allowable
- Make sure all items are properly categorized

- Salary and fringe benefits should be budgeted separately
- If graduate assistants are budgeted, their tuition should usually be budgeted too
- Make sure documentation is present for consultants, subawards, equipment, etc

REVIEW THE BUDGET: UNDERSTANDING ALLOWABILITY

- Sponsors award to many types of organizations who operate under different cost principles
  - Universities
  - Nonprofits
  - Hospitals
  - Individuals
  - Corporations

- In order to be allowable, a cost must
  - Conform to Cost Principles (2CFR200)
    - Necessary
    - Reasonable
    - Allocable
  - Conform to institutional policy
    - Consistently treated
  - Be budgeted in an appropriate budget category

DIRECT AND INDIRECT COSTS

- **Direct Costs**

  "costs that can be identified .. with a particular sponsored project..or that can be **directly assigned** to activities relatively easily with a high degree of accuracy." (A-21, D.1.)

- Indirect Costs (F&A)

  "costs incurred for common or joint objectives and ..cannot be identified readily and specifically with a particular sponsored project..or other activity." (A-21, E.1)

DIRECT AND INDIRECT COST EXAMPLES

- Direct Costs
  - Salary and Wages
  - Fringe Benefits
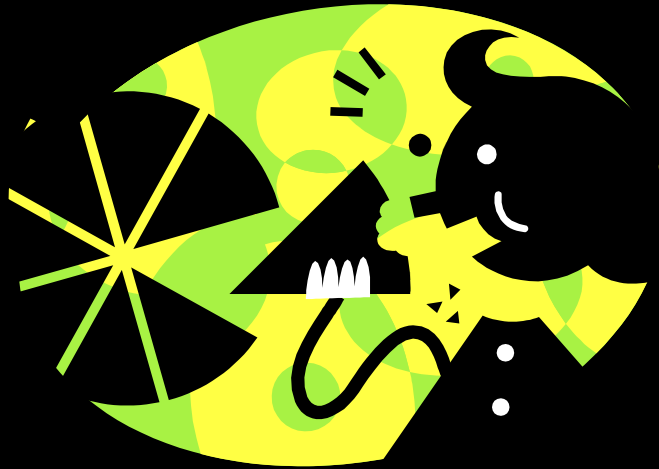 - Travel
  - Equipment
  - Supplies
  - And more..

- Indirect Costs (F&A)
  - Some Administrative Salaries and Wages
  - Office Space
  - General and Office Supplies
  - And more..

- The portion of a project's cost that is paid by the institution or another (non-sponsor) party

- Types of Cost Share:
  - Mandatory
  - Voluntary Committed
  - Voluntary Uncommitted
    - Cost Overrun

COST SHARE RULES

- Same Allowability rules as Direct Costs
  - Necessary
  - Reasonable
  - Allocable
- Costs must be incurred during the same project period
- Must be verifiable from institution's records
- Must be in support of the same project

- Funds can only be cost shared once
- Federal funds generally cannot be used as cost share, especially on another federal project!

COST SHARE: WHY NOT?

- Cost Share Myths:
  - It will make proposals more competitive
    - Usually doesn't unless sponsor specifies
  - It impacts reviewers' funding decisions
    - They may not even see it!

- What Cost Share Really Does:
  - Lower the institution's F&A recovery
  - Use up scarce resources
  - Create additional administrative burden

THIS IS THE FORMULA I USED TO DEVELOP MY BUDGET
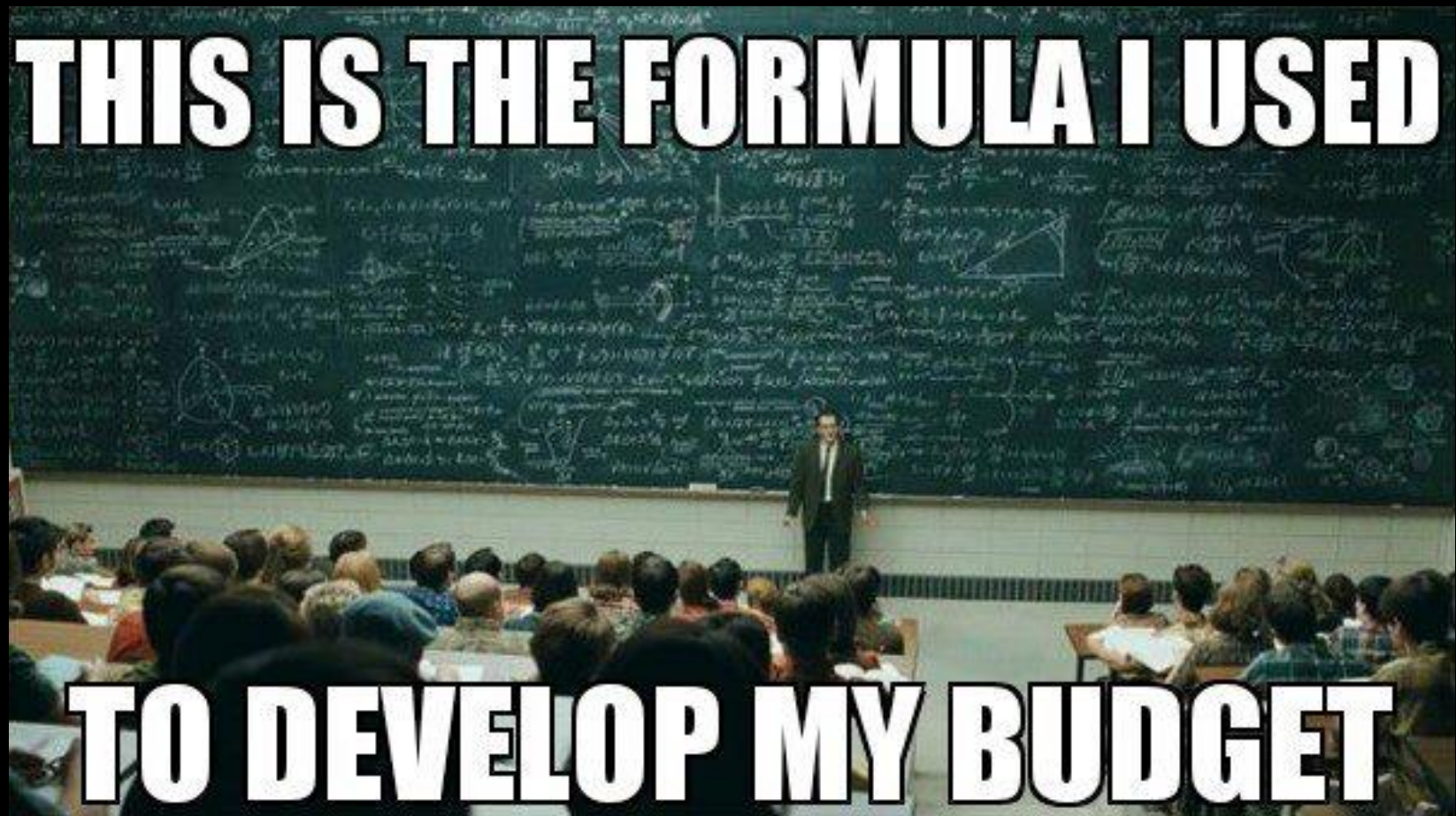
BUDGET CATEGORIES

- Salaries and Wages
- Fringe Benefits
- Materials and Supplies
- Equipment
- Travel
- Consultants

- Subawards
- Participant Support
- Patient Care
- Other Costs
  - Tuition
  - Usage fees
  - Rent
  - Et cetera…

TOTAL DIRECT COSTS
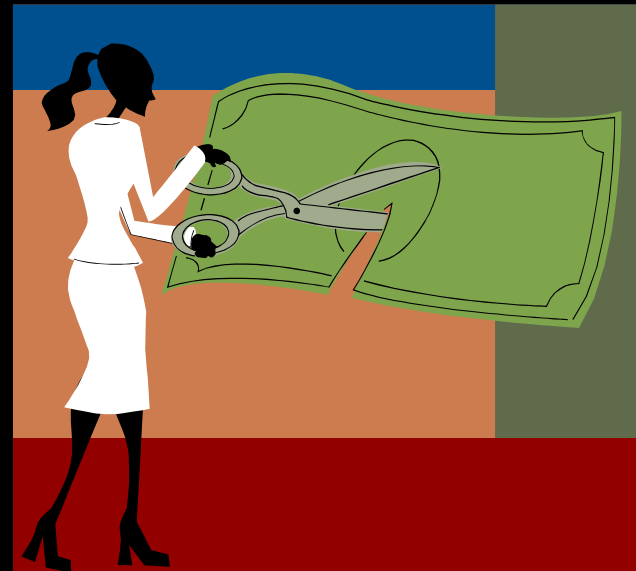
- All of these budget categories equal your Total Direct Costs
  - The amount your PI will be able to spend, in other words..

MODIFIED TOTAL DIRECT COSTS

- MTDC = Total Direct Costs
  - Exclusions
    - Equipment
    - Tuition
    - Amount of each subaward in excess of initial $25,000
    - Patient Care
    - Participant Support
    - Rent

- Capital improvements (construction, etc)

INDIRECT COSTS

- F&A (Indirect Costs)
- Rates are negotiated with the federal cognizant agency
  - DHHS or ONR
  - Classifications
    - Research, Training, or Other
    - On-Campus or Off-Campus

To Determine Which Rate To Use:

- Look at your institution's NICRA
- What type of project is it?
- Where is the work taking place?

SPONSOR-LIMITED F&A RATES

- A sponsor may only pay a certain percentage, or may not allow F&A at all
  - Must be in writing
  - Must be an actual policy that applies to all

- Examples:
  - NIH F31 fellowships do not separately reimburse F&A
  - US Dept of Education limits F&A to 8%

THE STRICTER RULE APPLIES

INDIRECT COST CALCULATIONS

Indirect Costs = Rate x Modified Total Direct Costs (MTDC)

- Calculate Total Direct Costs

- Calculate Modified Total Direct Costs

- Multiply the MTDC by the applicable F&A rate
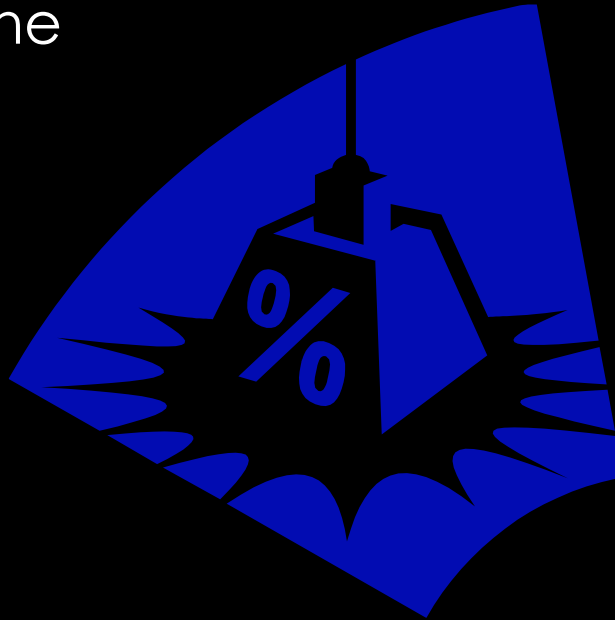
TOTAL BUDGET CALCULATION

- Total Budget = Total Direct Costs + Indirect Costs

- Most common error: using MTDC instead of total direct costs!

Right   Wrong
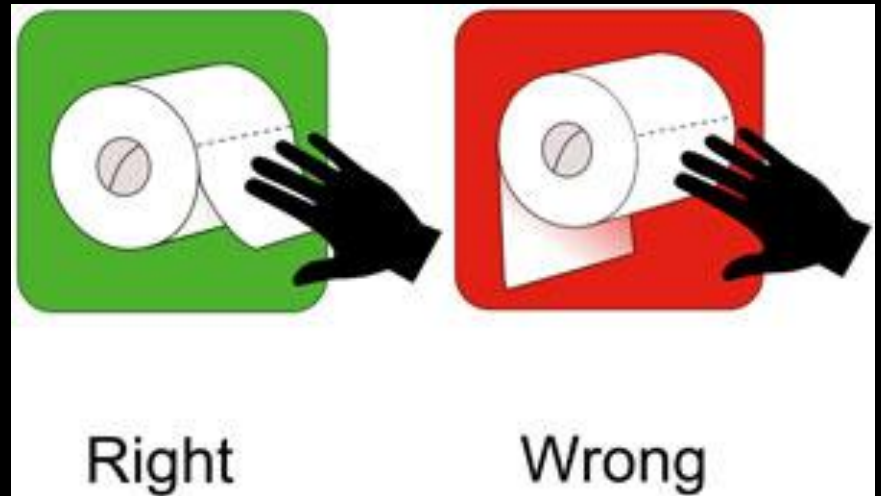
Congratulations!

- You have completed your proposal review!

- You're not done yet, though!

- Now you have to communicate with your PI to resolve issues.

COMMUNICATING WITH FACULTY

- Summarize your notes in an email to the faculty member
  - Numbered list
  - One issue per number
  - Tell them about all changes
  - Make sure they know what action is needed

- This gives you:
  - A running to-do list for you and the PI
  - Clear documentation of where the proposal is in the process

THINGS TO REMEMBER:

- Faculty are people, too
  - Diversity
  - Culture
  - Life outside the academe
- You are on the same team
- Be professional
- But it's okay to be friends

- Your Credibility and Integrity are of utmost importance!
  - Know what you're talking about before you engage!

EGOS AND UNFRIENDLY TYPES

- Assume Positive Intent

- Take Nothing Personally

- Understand that it comes with the territory

- Don't take the bait

- Don't be afraid to ask for help

- But don't immediately run for the hills either!

COMMUNICATING "NO"

- Guidance, not Gatekeeping
  - "No, I'm not letting you do that" vs.
  - "That's an unallowable cost under 2CFR200, but let's talk about what you really need.."

- Focus on honoring intent:
  - How CAN we do what needs to be done

CHAPTER AND VERSE

- How much information is too much?
  - May vary from one faculty member to another
  - Use direct quotes when you need to..
  - ..But explain in plain language whenever possible!

- Use your
  - Judgment
  - People Skills
  - Communication

WHEN TO CALL IN THE BIG GUNS

- Judicious use of the "Dean Card"
- Don't cc the boss on everything!
  - Yours OR the faculty member's!

- When to call for backup:
  - The faculty member is abusive
  - You don't fully understand the issues or know what to do
  - Multiple attempts to explain have been unsuccessful
  - You're losing your temper

STRESS FREE SUBMISSIONS

- Get information as soon as you can, well ahead of the deadline

- Get organized

- Work through the issues with the PI

- Send for approvals well ahead of the deadline crunch

- Anticipate issues and questions

- Be proactive

- Stay calm

- Take breaks

have fun

QUESTIONS?

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- Director of Sponsored Programs for Humanities & Sciences, Virginia Commonwealth University

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REFERENCES AND ACKNOWLEDGEMENTS

- David Smelser, University of Tennessee (Research Administration Memes)
- [Grants.gov Glossary](#)
- [RACC CRA Body of Knowledge](#)
- [Stanford University DoResearch](#) (Export Controls)
- [Uniform Guidance](#) (2CFR200)