### December 12, 2014

- UI Confidential Hotline Todd Stewart & Terry Johnson
- Grant Accounting Updates Audra Haddy
- Uniform Guidance Audra Haddy
- Universal Closeout Workbook Sue Lampe
- Sponsored Programs Announcements and Updates Jennifer Lassner
- Export Control Training Grainne Martin
- SciENcv Oliva Smith
- DSP Tracker Nathan Cook

December 12, 2014

# Research Administrator Meeting

# Agenda

- UI Confidential Hotline Todd Stewart & Terry Johnson
- Grant Accounting Updates Audra Haddy
- Uniform Guidance Audra Haddy
- Universal Closeout Workbook Sue Lampe
- Sponsored Programs Announcements and Updates – Jennifer Lassner
- Export Control Training Grainne Martin
- SciENcv Oliva Smith
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#### Staff Announcements:

- Sujatha Shetty hired as Business Analyst, Systems, Reporting & Compliance Team, May 2014
- Scott Kallaus promoted to Assistant Director, DHHS Team, June 2014
- Arbsie Barento promoted to Senior Accountant, DHHS Team, June 2014
- Roger Hayes hired as Grant Billing Specialist, Billing Team, July 2014
- Adrienne Tippet hired as Grant Billing Specialist, Billing Team, July 2014
- Erik Klefstad hired as Senior Financial Analyst, Systems, Reporting & Compliance Team, August 2014

http://gao.fo.uiowa.edu/contact-us

- Annual A-133 Audit-FY14 Single Audit
  - Starting end of 2014
  - Finished by March 15, 2015
  - Common questions
- Other audit activity

- Miscellaneous
  - Upcoming Research Admin Training Modules
  - Fringe Benefits for Temporary Employees
  - Function Code Definitions

# New OMB Uniform Guidance for Federal Financial Assistance

## **Uniform Guidance**

- Effective December 26, 2014
- DSP provided "Developing Proposal Budgets Under the New Uniform Guidance"
- Announcement summarizing changes was distributed via GAO Listserv on October 1, 2014
- Will be implemented by the Federal agencies through their own policies

- Administrative and Clerical Salaries are still normally considered F&A
  - But, major exception requirement has been removed
  - Are allowable if (all of the following):
    - Services are integral to the award,
    - Individual can be specifically identified with the activity,
    - Costs are explicitly included in the budget or have prior written approval of the Federal agency, and
    - 4. Costs are not also recovered as F&A

- Computing Devices (under \$5000)
  - Machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories for printing, transmitting and receiving, or storing electronic information
  - Allowable when:
    - Device is essential <u>and</u> can be charged (allocated) to the project based on a measurable benefit to the project
  - Computing devices that are general purpose are <u>not</u> allowable as a direct cost

- Participant Support Costs
  - Costs for stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (not employees) in connection with conferences or training projects
  - Allowable as direct costs only with prior approval from the sponsor
  - Prior approval is also required to move any approved participant support costs to another budget category

- Conference costs
  - Conferences include meetings, retreats, seminars, symposiums, workshops or events
  - Only allowed when the purpose is the dissemination of technical information <u>beyond</u> <u>the university</u>. Previously the guidance did not include this distinction.
    - Food or beverage provided as part of a "conference" that only includes UI participants are <u>not</u> allowable costs

- Entertainment costs
  - Continue to be unallowable as a direct cost unless there is a specific programmatic purpose and the sponsor has approved the costs.

- Subrecipient Monitoring and Management
  - New obligations to document risk assessment and monitoring activities of subrecipients
  - Use of fixed price agreements with our subrecipients now requires prior agency approval and is capped at \$150,000

- Sponsors are required to use federally negotiated F&A Rates unless specifically prohibited by Federal statute.
  - If one of our subrecipients does not have a negotiated rate, we are allowed to use a 10% de minimus rate.

 Agencies should not expect us to include voluntary cost sharing in a research proposal and it cannot be used as a factor during the merit review of applications unless explicitly described in the notice of funding opportunity.

# Improvements to Award Close Out Process

## Improvements to Award Close Out Process

- Why?
  - Streamline process & reduce number of days to close awards
  - Meet sponsor deadlines for submitting financial reports & invoices
  - Collect sponsor funds faster
  - Better utilize University resources
- Changes already implemented
  - Invoicing/Accounts Receivable Policy & Procedure
- Upcoming Changes
  - Standard close out process in Grant Accounting
    - Use of Universal Close Out Workbook in Pilot Phase
  - Modification to current notification process
  - Enhancements to Grant Summary reports
  - New policy for <u>re-filing</u> Financial Reports

# **Uniform Close Out Workbook**

#### **Universal Closeout Workbook**

#### Pilot Group and Implementation dates

- Pilot Group of four departments in the Fall 2014
- Expand the Pilot Group from January 2015 through March 2015 **GAO** is still looking for volunteers; contact anyone in Grant Accounting if you are interested
- Implement use for everyone April 1, 2015

#### External Procedures for the Universal Closeout Workbook

- This document will be added to the Grant Accounting website.
- Describes the purpose of the Universal Closeout Workbook and how it is to be used by Grant Accounting and other departments in order to closeout awards in a more timely and consistent manner.
  - Questions from Grant Accounting and answers from the department should be identified within the Universal Closeout Workbook.
  - The original email from Grant Accounting should be replied to, instead of beginning any new email correspondence regarding the closeout.
- Explains sections of the Universal Closeout Workbook.
- Identifies the deadlines for Grant Accounting to email the Universal Closeout Workbook with
  questions and concerns to the PI Dept Research Admin contact and Alternate Research Admin
  contact (if applicable) listed on the Award Information tab within the Financial Summary
  Reports, and deadlines for the PI Dept Research Admin contact and/or Alternate Research
  Admin contact to respond to Grant Accounting.
  - o Deadlines are generally based on the due date of Final Invoice or Financial Report
  - The due date for the department will be identified in red at the top of the email from Grant Accounting

#### **Universal Closeout Workbook**

- A template will be added to the Grant Accounting website for reference.
- There are multiple tabs within the workbook with various areas of review being done by the Grant Accounting contact.
- At the top of most tabs is a description of what is being reviewed on the tab and why it is being reviewed.
- The PI Dept Research Admin contact and Alternate Research Admin contact will only need to review the tabs highlighted in yellow, and the questions and/or concerns highlighted in yellow on those tabs.

## **DSP** Updates

Research Administrators Meeting December 12, 2014



## **Agency Announcements**

- New Biographical Sketch Format Required for NIH and AHRQ Grant Applications (NOT-OD-15-024)
- NIH Genomic Data Sharing Policy NOT-OD-14-12
- Pilot Program for Enhancement of Employee Whistleblower Protections (NOT-OD-14-068)
- NSF <u>Proposal and Award Policies and Procedures Guide</u> goes into effect December 26, 2014
- DOE Public Access Plan effective October 1, 2014



## IowaGrants.gov

## **Applications**

- Contact Katherine Gonzalez or Angela Roemerman when initiating an application
- Include IowaGrants.gov identifier when routing the application to DSP

## **Fully Signed Contracts**

- Email the contract to <u>dsp-contracts@uiowa.edu</u>
- Add Katherine Gonzales and Angela Roemerman to the project



## **Process Reminders**

- Proposals must be routed to DSP at least 5 business days before the sponsor deadline
- F&A Reduction, Visiting/Adjunct PI and Cost Sharing Request should be sent to DSP
- Communicate any special issues related to your sponsored project through routing form or email - DSP staff are not required to contact you prior to submission or communication with a sponsor
- Contact DSP when PIs plan to terminate employment or work off campus
- Encourage your faculty to use <u>Grant Bulletin</u> and <u>Knode</u> to identify collaborators and funding opportunities



# Export Control Basics

GRAINNE MARTIN

DEPUTY GENERAL COUNSEL

OFFICE OF GENERAL COUNSEL

## Overview

What are export controls?

How do they apply to the University of Iowa?

Do any exceptions apply?

What happens if we violate export control regulations?

Where to get help?

What other resources are available?

# What are export controls?

## Two types of export controls in place since the 1940s

- Federal regulatory regime that controls export of physical items (e.g., equipment, software, source code), services, and information to foreign countries and their nationals, wherever located
- Federal economic/trade sanctions programs that prohibit financial, trade, and other transactions with embargoed countries, designated foreign entities, and designated foreign individuals

### Purposes

- Protect national security and combat terrorism
- Prevent the proliferation of weapons of mass destruction (chemical, biological, nuclear)
- Protect US economic and trade interests
- Protect and further US foreign policy interests

## How do export controls work?

#### **Export restrictions**

If a controlled item, materials, information is/are to be shipped/disclosed to a foreign national, either in the US or abroad, and there is not exclusion/exemption available, a license must be issued before you can proceed

### Economic/trade sanctions programs

- If a financial or other transaction involves a foreign national, either here or in the US
  - If the foreign national is a restricted/prohibited party: no license may be available; license requirement may apply; no license may be required but may require evaluation of end-use or end-user
- If a country-specific sanction/embargo applies and no exception or general license is available, a special license must be issued before you can proceed

# Basic terms and concepts

**Export** 

Foreign national/foreign person

Defense article

Defense service

Restricted/prohibited party

## What is an export?

An actual shipment or transmission of export controlled items, information, or software <u>outside</u> the US

- Shipment or transmission abroad to anyone (including a US citizen abroad) or to any country or its government
- Examples: email, mail, downloads from websites, conferences, hand-carried items in travel

A release or disclosure of the same to a foreign national in the US ("deemed export")

- Release or disclosure can be in any form, including in writing, verbally, visually
- Examples
  - Disclosures to UI employees or students who are foreign nationals engaged in research on campus
  - Disclosures during lab visits by international visitors
  - Disclosures in non-public meetings and presentations (such as those on campus)
  - Emails/calls to foreign nationals (whether one is aware or not of foreign national status)

# Who is a foreign national/foreign person?

Any person not a US citizen or permanent resident (green card holder)

Any person not granted political asylum in the US

Any business or organization not incorporated in the US

Foreign governments

# What is a defense article? Defense service?

### Defense article (ITAR)

- Any item or technical data (information about the item) listed on the USML
- Does not include
  - Information in the public domain
  - Information about general scientific, mathematical, or engineering principles commonly taught in schools, colleges, universities

### Defense service (ITAR)

• Furnishing technical data or assistance (including training) to foreign nationals, whether in the US or abroad, about how to make, use, repair defense articles

# What is a restricted/prohibited party?

Foreign national (individual or entity) who/that appears on one of the lists maintained by Departments of Commerce, State, Treasury

Examples (taken from the "Consolidated Screening List" at http://export.gov/ecr/eg\_main\_023148.asp)

- Denied Persons List (Commerce, BIS)
- Unverified List (Commerce, BIS)
- Entity List (Commerce, BIS)
- Specially Designated Nationals List (Treasury, OFAC)
- Debarred List (State, DDTC)
- Nonproliferation Sanctions (State, Bureau of International Security and Nonproliferation)

# What export control restrictions are <u>most</u> likely to affect the University's work?

Two of the "export of items, materials, information" variety

- EAR
- ITAR

One of the "economic/trade sanctions" variety

OFAC

## What is the EAR?

- Export Administration Regulations, 15 CFR §§730-774
- Enforced by Department of Commerce (Bureau of Industry and Security [BIS])
- Regulates the export of technologies and technical information that may have both civilian and military uses ("dual use" items)
- Regulated items appear on the Commerce Control List (CCL)
  - Nuclear materials; chemicals, microorganisms, toxins; electronics; computers; telecommunications;
     lasers and sensors; avionics; marine; propulsion systems
  - EAR 99: designation for low-level technologies and consumer items subject to the EAR but not on the CCL
    - Generally do not require a license unless exporting to an embargoed country, an end-user of concern, or in support of a prohibited end-use

# What is ITAR?

- International Traffic in Arms Regulations, 22 CFR §§120-130
- Enforced by Department of State (Directorate of Defense Trade Controls [DDTC])
- Restricts the export of "defense articles" (items and related technical information that are "inherently military in nature") and "defense services" (furnishing assistance/training on regulated articles and data)
- Regulated items are on the US Munitions List (USML)
  - 21 different categories of items, including such things as weapons, chemicals/biological agents, missiles, military vehicles, military electronics, spacecraft systems, software and software components

ITAR is more restrictive than the EAR, with harsher sanctions for noncompliance

# What is OFAC?

- Office of Foreign Assets and Control, part of the Department of Treasury
- Enforces economic/trade sanctions against designated countries, organizations, and individuals (terrorists, international narcotics traffickers, persons engaged in proliferation of weapons of mass destruction)
  - The lists of those designated for sanctions/embargoes may change, depending on our foreign policy and other interests

# How do export controls apply to the UI?

Research

Human resources/Immigration

Purchasing

International travel

Shipping

International programs

**IT Services** 

Technology transfer

# The questions to ask

#### What?

• Does your work involve export controlled information or items?

#### Who?

Does your work involve foreign nationals?

#### Where?

• Are there international aspects to your work?

#### What for?

 Does your work involve sending or sharing something that could be used for a restricted/prohibited purpose?

# Do any exceptions apply?

#### Fundamental research exclusion

- Applies to information (not items) resulting from basic and applied research in science/engineering at accredited US institutions, where the information is ordinarily published/published and generally accessible to public
- Exclusion lost if University accepts restrictions on publication or participation in research

#### Educational instruction exclusion

Information conveyed to students in teaching is generally excluded

Publicly available information exclusion

Bona fide full-time employee exclusion

Not available if employee is not regular full-time

# What happens if we violate export control regulations?

#### Penalties for both University and individuals

- ITAR
  - Criminal: Fines up to \$1M, imprisonment up to 10 years; for each violation
  - Civil: Fines up to \$500K for each violation; revocation of export privileges
- EAR
  - Criminal: Fines up to greater of \$1M or 5x value of export, imprisonment up to 10 years; for each violation
  - Civil: Fines \$10K-\$120K for each violation; revocation of export privileges
- OFAC
  - Criminal: Fines up to \$1M, imprisonment up to 10 years; for each violation
  - Civil: Fines \$12K-\$55K for each violation

Loss of export privileges could shut down all University export controlled research

Negative impact on federal awards

# Recent sanctions at universities

Research universities have become focus for federal export control compliance efforts

- U Tennessee professor convicted in 2011 on 18 counts of ITAR violations for allowing foreign graduate students access to military technical information in a US Air Force defense project; sentenced to four years in prison
- U Michigan Research Fellow arrested in 2014 for sending a medical device to Iran
- 2013 settlement by U Massachusetts Lowell of \$100K fine, to be waived if no further violations in twoyear probationary period; shipped two EAR 99 instruments to Pakistan entity on the BIS Entity List
- Three NYU School of Medicine researchers charged for providing unpublished data from NIH project on MRI technologies to Chinese companies
- UCLA fined by OFAC for supporting a conference in Iran
- Texas Tech professor convicted of exporting Yersinia pestis (controlled under the EAR) without license to Tanzania; two years prison and \$37,400 fine

# Where to get help

#### **Division of Sponsored Programs**

- Empowered Official: Jennifer Lassner, 335.2123, jennifer-lassner@uiowa.edu
- Export Control Coordinators
  - Patricia Cone-Fisher, 335.3582, patricia-cone-fisher@uiowa.edu
  - Loren LeClair, 335.2120, loren-leclair@uiowa.edu
- General DSP export control contact: export-control@uiowa.edu

#### **Export Control Liaisons in specific units**

#### Office of General Counsel

• Grainne Martin, Deputy General Counsel, 335.2742, grainne-martin@uiowa.edu

## Resources

UI export control webpage: http://dsp.research.uiowa.edu/exportcontrols-home

Department of Commerce, Bureau of Industry and Security (EAR): http://www.bis.doc.gov/

Department of State, Directorate of Defense Trade Controls (ITAR): https://www.pmddtc.state.gov/

Department of Treasury, Office of Foreign Assets Control (OFAC): http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx

# **SciENcv**Science Experts Network Curriculum Vitae

Adapted from presentation by NCBI/NIH to Medical Library Assn. conference in May, 2014 http://www.ncbi.nlm.nih.gov/sciencv/tutorials/

RAMS Meeting Dec. 12, 2014 Oliva Smith, Div. of Sponsored Programs

# SciENcv → Create and Maintain Biosketches for Federal Grant Applications and Annual Reports

### Inputs

ORCID\*
eRA Commons
NCBI My Bibliography

\*Open Researcher and Contributor ID = unique identifier and record of activities; system-to-system linkage, as to SciENcv. <a href="http://orcid.org/">http://orcid.org/</a>

#### SciENcv

Name
Affiliation
Education
Honors
Awards
Personal Statement
Contributions
Grants
Publications
Collaborators
Patents
etc.



### Output

**NIH Biosketch** 

## SciENcv

 Built by the NIH-NCBI National Center for Biotechnical Information

 Supported by working group: NIH, DOD, DOE, EPA, NSF, USDA and the Smithsonian

Beta version rolled out in Sept. 2013.

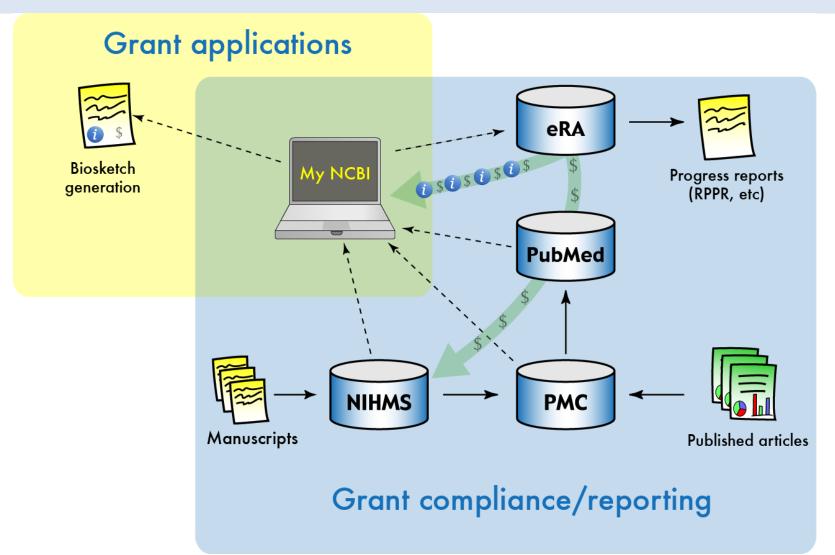
### SciENcv

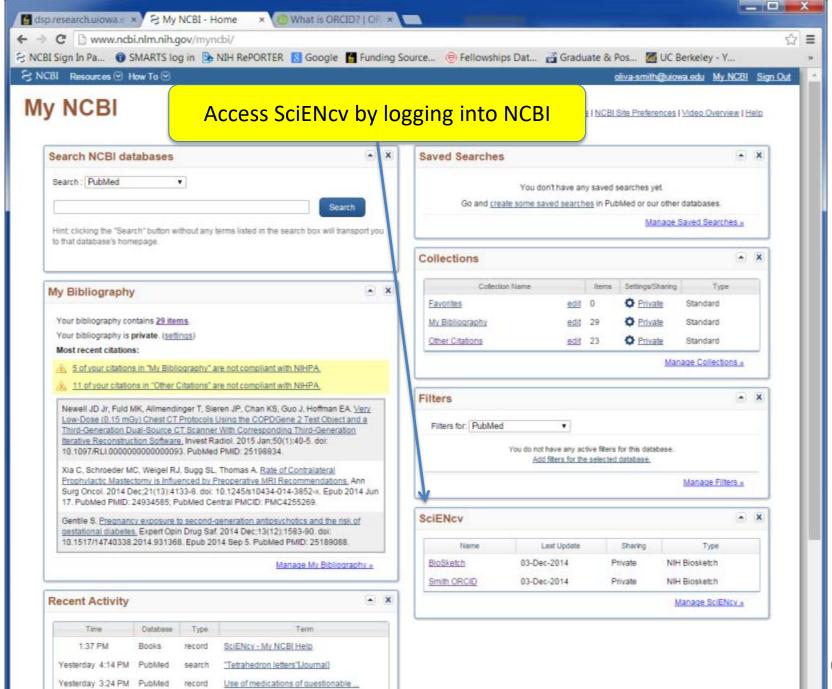
 Required on NIH and AHRQ applications with due dates on/after May 25, 2015.

http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html

 Encouraged for NIH and AHRQ applications prior to May 25.

### SciENcv is Integrated NIH-NCBI Tools



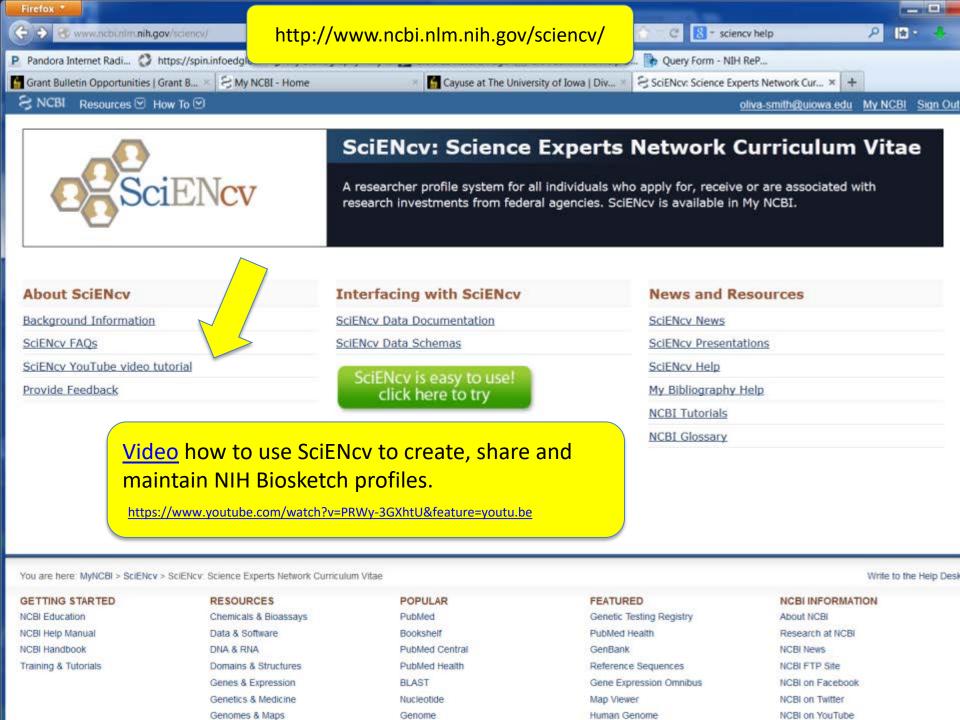


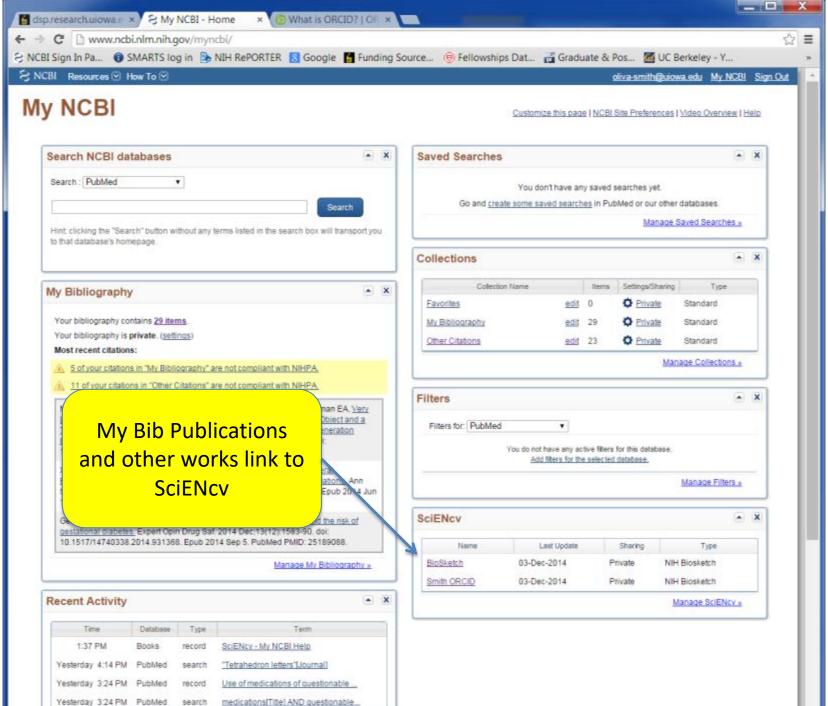


Yesterday 3:24 PM PubMed

search

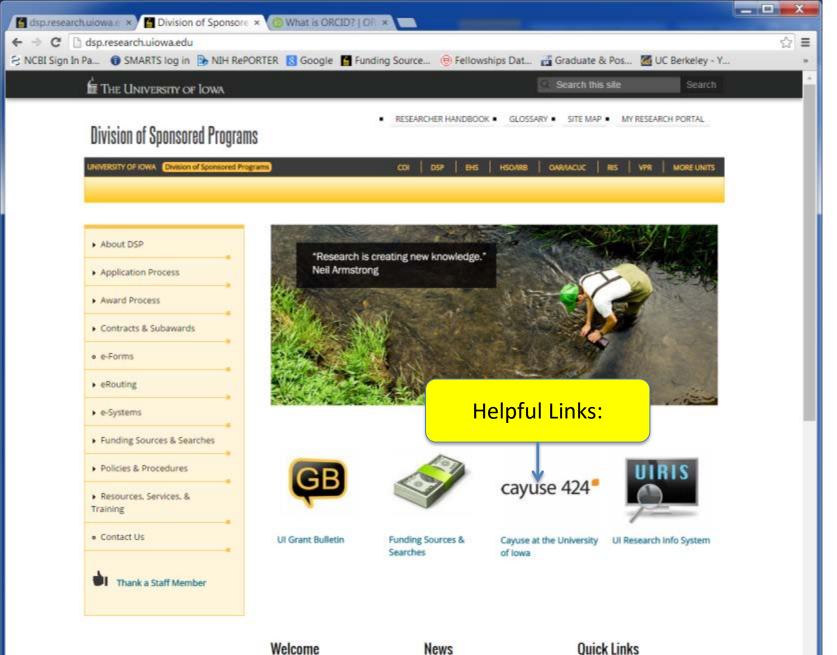
medications[Title] AND questionable...







search

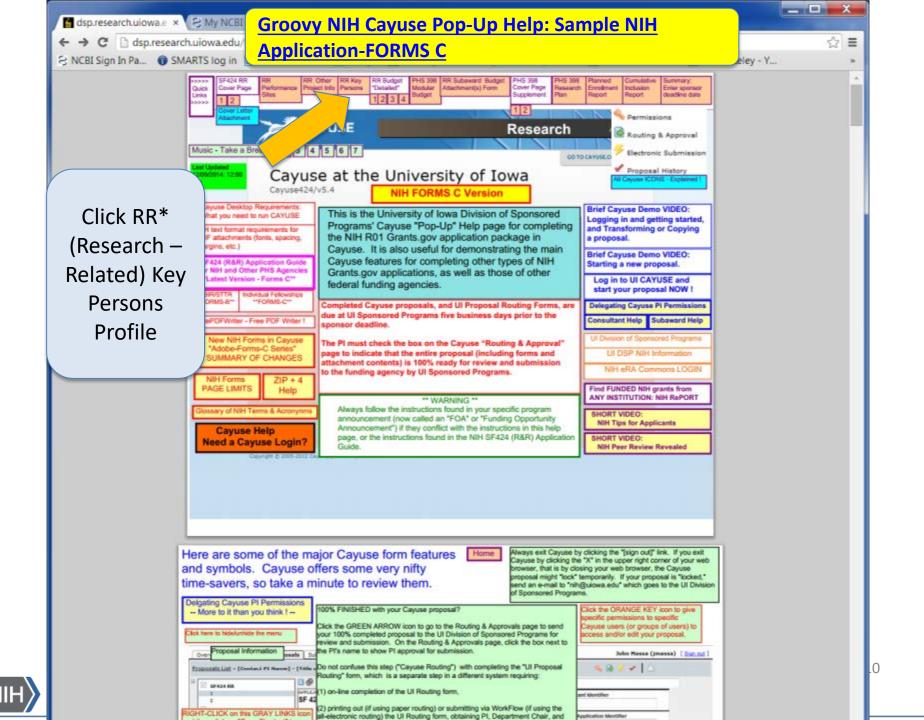




Hello and welcome to our website! Whether an esteemed colleague on the University of Iowa campus or a respected member of our

Working with the Division of Sponsored Programs (DSP) class -November 19, 2014

- Application Process
- Budget Preparation Facilities & Administrative (F&A)





### **Thank You**

- Investigators must use My NCBI for publications for RPPR and/Progress reports and now for SciENcv biosketches.
- NCBI How to Use: http://www.ncbi.nlm.nih.gov/books/NBK3843/
- SciENcv How to Use:
   <a href="http://www.ncbi.nlm.nih.gov/books/NBK154494/">http://www.ncbi.nlm.nih.gov/books/NBK154494/</a>
- Questions? Would you like us to present to your group?
   Contact DSP dsp@uiowa.edu or Oliva Smith oliva-smith@uiowa.edu

#### Launch of DSP Research Tracker

https://uiris.uiowa.edu/combined\_log/main/view

#### **Features of the DSP Research Tracker include:**

- Direct access to AAAN documents, final award/contract documents, and sub-award agreements;
- The email address of DSP reviewer assigned to your grant or contract;
- Routing forms, still in workflow, are displayed along with proposals received by DSP;
- Detailed and specific status descriptions of research items with DSP;
- Links to GAO financial reporting showing budget and expenses;
- Columns are sortable and can be rearranged.

#### How to get to the DSP Research Tracker

- Links on UIRIS main page & UIRIS routing form/aMFK page (upper right)
- Quick Links on DSP website
- Links and quick looks to Tracker on My Research Portal