

December 7, 2016

- GAO Announcements
- Overview of Upcoming Changes to Research Subject Payment Policy
- Review Quick Reference Guide
- New Guidance – NRSA Training/Fellowship Awards
- DSP Announcements
- NIH & NSF Updates
- Outgoing Subawards
- Export Control

December 7, 2016

Research Administrator Meeting

Agenda

- GAO Announcements
- Overview of Upcoming Changes to Research Subject Payment Policy
- Review Quick Reference Guide
- New Guidance – NRSA Training/Fellowship Awards
- DSP Announcements
- NIH & NSF Updates
- Outgoing Subawards
- Export Control

GAO Announcements

Staff Announcements:

- Open Accountant position
- Carol Cubbage, retiring December 30th

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

GAO Announcements

- FY16 Single Audit
- Other audit activity

Research Subject Compensation

New policy, effective January 1, 2017

Why did we create a new policy?

Reduce burden and make sure we are collecting and retaining necessary information to meet IRS and sponsor requirements.

IRS Requirements:

- Considers research subject payments to be taxable income.
- Reporting depends on recipient's tax status & payment amount:
 - For US Citizens & permanent residents: name, address & SSN for any individual who receives more than \$600/year
 - For non resident aliens, must report all payments and withhold 30% from the payment

Uniform Guidance Requirements:

- Costs must be supported by source documentation



Research Subject Compensation

What is different?

- Threshold for payment type & collection of SSN
- Source documentation
- Exceptions

Research Subject Compensation

Threshold for payment type & collection SSN

- If payment > \$100 OR cumulative payments to subject will exceed \$600/calendar year OR subject is non-resident alien, payment must be made with a check
 - Subject must complete Substitute W-9 or Substitute W-8BEN which includes SSN or TIN
- For all other payments, a record of subjects paid must be maintained in the Department issuing payment

Research Subject Compensation

Source documentation

- For all other payments, a record of subjects paid must be maintained in the Department issuing payment
 - Requires name, address, payment date

Research Subject Compensation

Exceptions to policy (no subject information collected):

- Only allowed when IRB has approved a waiver of documentation of consent in order to protect the identity of the research subject
- Still require the department to track payments

Research Subject Compensation

What doesn't change?

- Payment types
- Cash handling procedures
- Need for confidentiality

Research Subject Compensation

Next Steps?

- New policy will be distributed by Dec 12th
- Additional procedural documentation will be developed & distributed
- Specific FAQs will be added
- New training session **How to Pay Research Subjects** will be offered starting February 2017

Quick Reference Guide

Updated and posted to GAO website under Training and Other Resources: <https://gao.fo.uiowa.edu/grant-and-contract-management/general-administration/quick-reference-guide-sponsored-project>

Provides guidance on whether a particular type of cost that is allowable. Not intended to be all-inclusive and does not preclude the need to look at the terms of specific sponsored agreements.

See The University of Iowa Accounting Code Manual for an entire list of types of costs (<http://www.bo.uiowa.edu/~glaccman/index.cfm?action=glaccman.iacct>).

Quick Reference Guide

Sponsored projects are to be charged directly for the types of direct costs that are:

- 1) allowable under the terms and conditions of the sponsored agreement;
- 2) consistently treated as direct cost under like circumstances;
- 3) reasonable and necessary for the performance of the sponsored agreement; and
- 4) allocated based on the proportional benefit to the project.

Quick Reference Guide

Review of some specific types of costs:

Alterations & Renovations

- Rarely allowed
- Must have prior approval

Computing Devices

- Should be included and justified in sponsor budget
- Otherwise, department must maintain documentation to justify that the device is not general purpose, essential to the project & allocated based on direct benefit to the project.

Quick Reference Guide

Intra-university consulting is unusual. Allowable only if:

- Consulting arrangement is specifically identified in the award notice OR approved in writing by the sponsor
- Faculty is in another division/department
- Work is in addition to regular responsibilities
- Is essential to the project and cannot be provided by anyone supported directly from the project
- Charge is appropriate considering the qualifications and normal charged of the consultant, and the nature of the services to be provided
- Compensation is paid directly to the individual as extra compensation.

Quick Reference Guide

Equipment maintenance & repair (including service agreements)

- Equipment must be specifically required to meet the project aims (not general purpose)
- Must be prorated based on the use of the equipment and the period covered. Service agreements that extend past the end of the award should be prorated accordingly.

Food (Meals & Beverages)

- Not normally allowed
- Must have prior approval from sponsor
- Includes business meals while in travel status

Quick Reference Guide

Grad Student Tuition

- Grad Student must be appointed to the award and the cost of tuition must be prorated consistently if there are multiple funding sources.

Office Supplies

- Not normally allowed
- Should always be assigned as 6070 regardless of where they are used

Recharge Centers, Service Centers, Specialized Service Facility & Any Other UI Provided Service

- Allowable when unit is a recognized Service Center and follows [UI Service Center Policy](#)
- Costs charged based on approved rates (annually reviewed & established)
- Supported with source documentation

Quick Reference Guide

Travel

- Grad Research Assistants are not considered trainees (should use 6025, 6026, or 6027)
- International travel often requires prior approval
- All international travel must comply with Fly America

NRSA Training/Fellowship Awards

New Guidance added to GAO website, under Managing Grants and Contracts/NIH NRSA Training Grants & Fellowships:

- [NIH NRSA Training Grant Information](#)
- [NIH NRSA Training Grant and Fellowship Termination Notice](#)
- [NIH NRSA Fellowship Information](#)
- [NIH NRSA Fellowship Activation Notice](#)

DSP Updates

Research Administrators Meeting
December 7, 2016

DSP Updates

DSP Announcements — Wendy Beaver

NIH and NSF Updates — Paul Below

Outgoing Subawards — Erin Brothers

Export Control — Pat Cone-Fisher, Loren LeClair

DSP Announcements

- DSP Staff Introductions
 - Dylan Campbell, Administrative Services Coordinator
 - Carrie Damon and Melissa Shriver, Sponsored Research Coordinators
 - Kathie Gonzales, Sponsored Research Specialist
- DocuSign for electronic signatures
 - DocuSign account is not required to approve or view documents
- **GOLDrush**
 - <https://goldrush.uiowa.edu/>
 - University of Iowa Crowdfunding Platform
 - To support research and other academic-related activities
 - Contact Theresa Jubert at UI Foundation with questions: 319-467-3659, Theresa-Jubert@uiowa.edu



DSP Courses

Log in to *UI Self Service*

Under *Learning and Development* select *My Training*

Enroll in Courses (search by course title or number, click *View Course*, click *Enroll in This Course Session*)

- Using the Proposal Routing Form, Course #758,
 - Dec. 12, 2016, 10:00 – 11:30 a.m. 2520D UCC
- Creating a Budget for a Sponsored Research Project, Course #808
 - Feb. 7, 2017, 1:30 – 3:00 p.m. 2520D UCC
- Coming in 2017:
 - Outgoing Subawards
 - Working with Industry
 - SBIR/STTR Proposals and Subawards
 - Your interests???



Cayuse Training Webinars starting in January 2017

<https://dsp.research.uiowa.edu/training-opportunities>

NIH Updates

- New Policy Eliminates Most Appendix Material for NIH/AHRQ/NIOSH Applications Submitted for Due Dates On or After January 25, 2017
([NOT-OD-16-129](#))
- Changes to the NIH/AHRQ Policy on Post-Submission Materials for Applications Submitted for Due Dates On or After January 25, 2017
([NOT-OD-16-130](#))

NIH Updates

- Policy on Funding Opportunity Announcement for Clinical Trials ([NOT-OD-16-147](#))
- Policy on Good Clinical Practice Training for NIH Awardees involved in NIH-Funded Clinical Trials ([NOT-OD-16-148](#))
- NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information ([NOT-OD-16-149](#))

NIH Updates

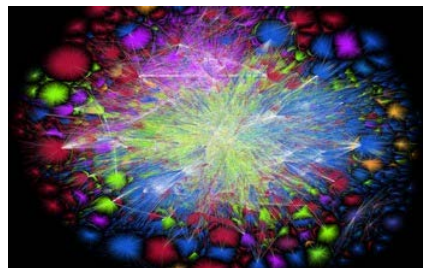
- Optional Electronic Submission Method to Request to Submit an Unsolicited Application That Will Exceed \$500,000 in Direct Costs ([NOT-OD-17-005](#))
- Adjustment to Stipend Levels for Postdoctoral Trainees and Fellows on Ruth L. Kirschstein National Research Service Awards (NRSA) ([NOT-OD-17-002](#))

NIH Updates

- NIH Implementation of Final Research Performance Progress Report (Final RPPR) ([NOT-OD-17-022](#))

NSF Updates

- New PAPPG ([NSF 17-001](#)) effective for proposals submitted or due on or after January 30, 2017
 - New types RAISE and GOALI
 - Collaborators & Other Affiliations – Thesis Advisor & Postgraduate Scholar Sponsor replaced with Ph.D. Advisor
 - Late proposals due to natural disaster – requires single copy document



–Proposal Submission Modernization

- Replacing Fastlane
- Launch through Research.gov
- https://www.nsf.gov/bfa/dias/policy/era_forum.jsp

Outgoing Subawards

- FDP ([Federal Demonstration Partnership](#)) – Revised Templates
- FDP Expanded Clearinghouse Pilot – Subrecipient Monitoring
- Subaward LEAN Event

Outgoing Subawards – FDP Templates

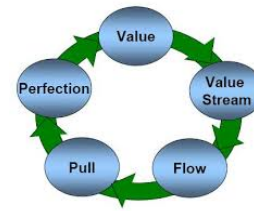
- Revised September 2016
- Attachment 2 – Federal Award Terms and Conditions
 - Updated and Expanded Subaward Compliance and Reporting Requirements form
 - Form required for all outgoing subawards: new and amendments
 - The form is available on our Outgoing Subaward website for new subawards; form is included with the Subaward Amendment Request Form.

Outgoing Subawards – FDP Expanded Clearinghouse Pilot

- Repository for online entity profiles in lieu of subrecipient commitment forms for pass-through entities to use when issuing subawards or monitoring the subrecipient entities.
- Relief of administrative burden
- [FDP Expanded Clearinghouse](#)

Outgoing Subawards – LEAN Event

- 2.5 days of meetings with DSP, GAO, RIS and departments
 - Outcomes
 - Information added to AAAN*
 - Training*
 - “Magic” Form
 - Updates to Routing Form
 - Electronic Processing Payment of Invoices
 - Review Outstanding POs
 - Grant Reports
- * *Currently in process*



Outgoing Subawards – LEAN Event

- Information Added to AAAN
 - Link to subaward instructions
- Training
 - Continue to offer subaward classes
 - Exploring having separate classes based on:
 - Pre-award (proposal stage)
 - Initiating Subaward (award stage)
 - Post-award (invoicing, monitoring/reports, close out)

Export Controls in Research



December 7, 2016



What is an export?

- The physical shipment of an item
 - Sharing technology/information with or giving access to items to a foreign national*
 - Can include simple visual inspection
 - "Deemed Export" Sharing of information in the US with a foreign national is treated as an export to that person's country
- *Foreign National - A person who is not a US citizen, permanent resident (green-card holder), or certain persons granted asylum

What are export controls?

- Laws that control and regulate the distribution of certain items and types of information to foreign entities and persons
- The Laws/Regulations are:
 - ITAR: International Traffic in Arms Regulations, administered by the State Department (DDTC)
 - EAR: Export Administration Regulations, administered by the Commerce Department (BIS)
 - OFAC: Office of Foreign Asset Control, administered by the Treasury Department (OFAC)

Penalties



- 20 years in prison
- \$1 million fines, to the UI or the individual
- PI/discloser personally liable
- Per export - each time it is sent or viewed, it is a violation
- Administrative penalties are possible as well
- Loss of Eligibility for Federal Funding

Purposes of the Laws

- 1) Restrict the export of goods & technologies that could benefit U.S. adversaries.
- 2) Prevent proliferation of weapons of mass destruction.
- 3) Advance U.S. foreign policy goals.
- 4) Protect the U.S. Economy & promote trade goals.
- 5) Prevent leaks of technology to U.S. economic competitors.

Examples of Export Controlled Items

- Foreign Collaborators
- GPS
- Satellite components and technical data
- Pathogens
- Lasers
- Night vision goggles
- Encrypted software
- Military vehicles – including specifications
- Computers – AND the information on them

Conditions implicating export controls

- Restrictions on foreign national participation
- Restrictions on the publication or disclosure of the research results
- Shipping equipment to a foreign country
- Collaborating with foreign colleagues in foreign countries
- Training foreign nationals to use equipment
- Working with a country subject to a U.S. boycott/sanction

Conditions (cont.)

- Sponsor, or others, indicated export controlled information would be furnished
- The physical export of controlled technology is expected
- Sponsor has mentioned any issues regarding export controls
- Sponsor or a Subcontractor is a foreign entity

Toxins and Select Agents

- Ricin
- Avian Influenza
- Chikungunya virus
- Ebola virus
- Rabies virus
- SARS-associated coronavirus
- Francisella tularensis
- Yersinia pestis (the Plague)
- Tetrodotoxin
- Conotoxin



Restricted Party Screening

- When working with a foreign collaborator, Sponsor or Subrecipient, DSP screens for:
 - Person
 - Entity
 - Country – especially the 5 highly sanctioned
 - Iran
 - Cuba
 - North Korea
 - Syria
 - Sudan

Other issues implicating Export Controls

- Publication or dissemination restrictions
- Participation restrictions
- DoD form DD 2345 Militarily Critical Technical Data Agreement
- Export controlled information/items used in an otherwise Fundamental Research project (Non-Disclosure Agreement)
- Foreign travel

Send an Email or Call Anytime

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- export-control@uiowa.edu
- Our website:
 - <http://research.uiowa.edu/dsp/main/?get=export-controls>

Division of Sponsored Programs



Division of Sponsored Programs

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