Research Admin 101 Series

Award Set Up, Commitments and Cost Sharing

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Today’s Agenda

• What is “Award Set Up?”
  – Importance, overview of process & award types
• Items Reviewed for Award Set Up
  – Protocols
  – Award Terms & Conditions (T&C)
  – Budget & Rates
  – Effort Commitments & Cost Share
  – Financial Conflict of Interest (FCOI)
• Award Received – What Happens Next?
  – Department and Divisional/Deans Offices
  – RSP
• Questions/Answers
• Group Exercise
Life Cycle of an Award

Award Setup focuses on these two areas

Importance of Award Set Up

- Award setup forms the bridge between Pre-Award and Post-Award
- Establishes the foundation for effective future management of the award
- Accurately recording data points during award setup is critical to effective and compliant award management.
- Efficiency and accuracy are critical.
- Award setup is a gate-keeping step for beginning research: spending and progress can only occur once an award is set up.

Award Set Up at UW

- Several handoffs
  - RSP, Department, Dean’s Office, PI’s
  - IRB, IACUC, COI, effort, etc.

- High level: All new awards or award modifications, must be entered into the UW’s grant management systems.
  - Pre-Award tracking = WISPER
  - Post-Award financial system = WISDM
Award Set Up at UW

Award Overview

- What Constitutes An Award?
- What Types Of Awards Are There?
- What Do Awards Look Like?

Award Types

- Grant
  - Purpose is to transfer money, property, services, or anything of value to recipient in order to accomplish a public purpose
  - No substantial involvement between sponsor and recipient
- Cooperative Agreement
  - Purpose is to transfer money, property, services, or anything of value to recipient in order to accomplish a public purpose
  - Substantial involvement is anticipated between sponsor and recipient
- Contract
  - Principle purpose is to acquire property or services for direct benefit of the sponsor. Procurement mechanism.
  - Cost-reimbursable: Invoicing based on expenditures
  - Fixed-price: Invoicing based on milestones or deliverables
Types of Award Actions

- **New Award/Competing Award**
  - New research or project idea funded competitively for the first time

- **Continuation Award/Non-Competing Award**
  - Incremental funding of a previously approved project period (such as annual funding on a multi-year project)
  - Usually based on reasonable progress reported by investigator

- **Renewal/Competing Continuation**
  - Continuing project funded competitively for a new project period

- **Supplemental Award**
  - Additional funding provided by the sponsor during a previously approved budget period (such as an REU - Research Experiences for Undergraduates - supplement to an NSF award)

- **Modification/Amendment**
  - Budget modification
  - Change in scope of work or significant change in research plan
  - Change in key personnel or level of effort on the project
  - Administrative changes (e.g., change in reporting requirements)
  - Termination of agreement

- **No-Cost Extension**
  - Extension of agreement end date without additional funding from the sponsor
Award Notice Key Elements

- Awarding entity and authority
- Sponsor award number
- Catalog of Federal Domestic Assistance Number (CFDA)
- Recipient/Awardee name (institution)
- Name of Principal Investigator/Project Director
- Reference to proposal or project title
- Award period (start and end dates)
- Funding (total, incremental)
- Invoicing/payment
- Reports/deliverables
- Terms and conditions (in text, attached, or incorporated by reference)

Refer to handouts – NIH Notice of Award provides an example

Protocols

https://www.rsp.wisc.edu/compliance.html

- Animal Use
- Environment, Health & Safety
  - Biological Safety
  - Chemical & Environmental Safety
  - General Safety
- Human Pluripotent Stem Cell Research
- IRB (Institutional Review Board)
  Human Research Protections Program
Protocols

Animal Use

- Personnel involved in animal care and use must undergo appropriate training
- Protocol must be in place for project-specific animal use
- Award number, project title and sponsor name must be listed on an approved protocol
- For PHS and NSF awards, animal congruency check is required for Award Setup

https://www.rarc.wisc.edu/
Protocols

http://www.ehs.wisc.edu/biosafety.htm

Environment, Health & Safety: Biological Safety
- Personnel involved in biological must undergo appropriate training
- Appropriate biosafety protocol must be in place
- Award number, project title and sponsor name must be listed on an approved protocol

Protocols

https://research.wisc.edu/respolcomp/scro/polres/

Human Pluripotent Stem Cell Research
- Stem Cell research must have approval of institutional review committee
- Approval required by sponsor prior to award issuance

Protocols

IRB (Institutional Review Board)

Human Research Protections Program
- Health Sciences IRBs:
  https://kb.wisc.edu/hsirbs/
- Educational & Social/Behavioral IRB:
  http://www.irb.wisc.edu/index.htm

**Human subjects research must undergo an IRB determination prior to Award Set Up
Protocols

Protocol Lookup System (PLuS)
https://my.gradsch.wisc.edu/lookups/plus/lookup.pl

Export Controls

https://research.wisc.edu/respolcomp/exportcontrol/

Export Controls
- Each UW researcher must determine export control applicability
- Questions on WISPER General Tab and Projects Tab prompt further review and determination
- Liability for violating laws is with individual
- If not entered at set up, export control office will follow-up directly.

Award Terms & Conditions

• Notice of Award outlines Terms and Conditions
• Award terms are legally binding requirements
• WISPER “Terms” Tab used to capture specific terms for award management
• WISDM “Requirements” details Terms and Conditions of note
• Read NoA carefully!
**Award Terms & Conditions**

**Federal Agencies**
- Overarching award terms (i.e., Research Terms and Conditions)
- Tend not to require negotiation
- Special Terms and Conditions include program or project-specific requirements
- Contracts vs grants

**Award Terms & Conditions**

**Non-Federal Sponsors**

**Terms to negotiate**
- Confidentiality
- Data ownership
- Intellectual Property rights
- Liability
- Legal disputes and jurisdiction
- Publication rights
- Invoicing or payment terms

**UW must adhere to**
- Federal regulations
- State regulations & laws
- UW System policies
- UW-Madison policies

**Budget & Rates**

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Budget & Rates

1. NoA – Award amount = $250,000

2. Budget – Indicates 10% IDC rate

3. IDC policy in WISPER

Commitments

Commitments are made at Proposal Stage

Where: Budget, Budget justification, SOW (if specific & quantified)

What: The quantified amount of time proposed in a grant proposal or other project application

RSP Effort Web Page: [https://www.rsp.wisc.edu/effort/index.cfm](https://www.rsp.wisc.edu/effort/index.cfm)
Commitments

Who has a commitment?
- Everyone, and Anyone, listed in a proposal with a specific and quantified amount of time proposed.
- If no commitments are proposed in the grant application, UW effort guidelines state that the contact PI must have minimum of 1% effort commitment
  - Based on 2001 OMB memo, and referenced in the Uniform Guidance
- Exceptions to the minimum PI commitment rule: Equipment or instrumentation grants, doctoral dissertation grants, and student mentoring grants, clinical trails
- UW policy, faculty cannot commit 100% of their time on sponsored projects. Time must be reserved for other UW duties.

What does the UW track at Award Set-up?
- Effort commitments only for those individuals identified in the award document.
  - Typically the just the PI, or other senior/key Personnel
  - Exceptions: Fellowships, equipment, financial aid, clinical trials, doctoral dissertation grants, and student mentoring grants
- If the award document does not specifically identify PI, Co-PI, or Key Personnel, effort commitment will be tracked for the contact PI only.
- This practice does not diminish the scientific contribution to the project of other senior/key personnel; it merely limits the number of individuals that are affected by the effort-related prior approval requirement to those specifically named in the NoA.

Why UW only tracks those on NoA?
- Uniform Guidance (2 CFR 200), provided an opportunity for UW-Madison to review its effort policies and procedures.
- Prior approval is required for a reduction of 25% or more in the level of effort for senior/key personnel named in the NoA.
  - Those not listed in the NoA may adjust their commitment without prior approval.
- Seeks to take advantage of flexibilities provided by Uniform Guidance to reduce administrative burden

https://www.rsp.wisc.edu/effort/Guidance_Treatment_Effort_Commitments.pdf
What if my budget is cut?
Commitment is the quantified amount of effort proposed that the sponsor accepts and awards, regardless of salary support. Sponsor reductions in budgets do not mean the Sponsor accepts a reduction in effort.

Options for dealing with budget cuts:
• Keep salaries & effort the same as proposed; reduce other budget categories (travel, supply etc.)
• Keep effort the same, reduce salaries – document the increased cost share
• Reduce effort commitments – prior approval needed from sponsor if reduction is greater than 25% for those in NoA.

Effort Certification
Effort Certification: Required by Federal Regulation and University policy.

Effort Certification is the UW’s means of:
• Providing assurance to Sponsors that faculty and staff have met their commitments
• Confirm salaries charged to sponsored projects are reasonable in relation to the work performed

Effort Certification is done through ECRT but we use WISPER to confirm Effort Training and Certification requirements are met.

Effort Certification
Effort Requirements for Account Set Up:
• All Key Personnel must complete Effort Training
• Required Certifications must be complete
  – PI must certify effort for self and staff (graduate students, postdocs & classified staff)
  – Key Personnel must certify for self

Note: RSP will not set up awards if any key personnel on an award have not met Effort Requirements.

A validation warning in WISPER if Key Personnel have not met requirements.
• WISPER General Tab and Projects Tab have a help icon that provides a link to RSP ECRT page for help.
• If questions- Please contact your Department Effort Coordinator.
Cost Sharing

- **Cost Sharing:** The portion of the total costs of a sponsored project that is borne by the UW rather than the sponsor.
  - University’s policy is to minimize institutional and third party cost sharing on sponsored projects. Should only be included in proposal when necessary.
- **Salary Cost Share:** Occurs on a sponsored project when the University, not the sponsor, provides salary support for an individual’s time on that sponsored project.
  - Collected at Award Set-up. Can be entered later if needed.

Types of Cost Sharing

- **Mandatory Cost Share:** Cost sharing that is required by the sponsor as a condition for proposal submission and award acceptance.
- **Voluntary Cost Share:** Cost sharing that is offered in a proposal’s budget but not required by the sponsor as a condition of proposal submission. Once offered by the institution and agreed to by the sponsor, it becomes an obligation the university must fulfill.

Cost sharing

- **Uniform Guidance, § 200.306: Cost Sharing or Matching:**
  - “Under Federal research proposals, voluntary committed cost sharing is not expected.”
  - “Criteria for considering voluntary committed cost sharing and any other program policy factors that may be used to determine who may receive a federal award must be explicitly described in the notice of funding opportunity.”
Commitments & Cost Share

At Award Set Up:

- Commitments only entered for those on NoA
  - Look at award to identify personnel
  - Then look at proposal to identify level of commitment
- Enter commitment into WISPER projects tab
  - Paid or Cost Shared
- All key personnel should be up to date with effort tasks (training and certification) before award can be set up.

Example: WISPER – Effort & Cost Share Entry

Example: Randal Tibbetts is the only person listed on the NoA. Below is the budget included in the proposal.

The Effort Process in a Nutshell
FCOI Compliance

At award set up RSP checks to ensure all key personnel are up to date with FCOI tasks

- **University COI Policy:**
  - All Key Personnel required to have a valid annual OAR on file to receive RSP award set-up services
  - Annual OAR submissions are due May 1st of each year
  - This is indicated on the General Tab of each WISPER record.

- **PHS FCOI Policy:**
  - All Key Personnel on PHS Awards will need to complete FCOI training.
  - All Key Personnel will need to update their OAR at time of Award Set Up.
  - Agencies Using the PHS FCOI Regulations: [http://sites.nationalacademies.org/PGA/fdp/PGA_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596)

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PHS FCOI Compliance

**Process for FCOI Check**

1. Key personnel are identified by RSP and loaded into the personnel section of the General tab in WISPER
2. Record is then loaded to FAST by (FCOI Award Setup Tool)
3. Key personnel are notified via email and instructed to complete FCOI requirements. Department contact is also copied on this e-mail.
4. FAST tracks and logs FCOI items in compliance and emails RSP when items are completed
5. Only when all items are completed will RSP move forward.

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PHS FCOI Compliance

**FAST:** [https://my.gradsch.wisc.edu/coi-rsp/coiDashboard.pl](https://my.gradsch.wisc.edu/coi-rsp/coiDashboard.pl)
NoA Received – Now What?

RSP receives the award first
- RSP will send a “Set Up Projects” approval to the Award Setup contact (list maintained by Division). The purpose is to capture the details of the award for account creation.

PI or Department receives award notice first
- You can upload document(s) to Attachments tab
- Complete Projects Tab
- Send approval to Division

RSP Actions

RSP receives NOA
- Communication to the Department and/or Division by RSP
- RSP will identify requirements in need of action
  - FCOI requirements
  - Confirm PI effort and/or cost share
  - Verify budget
  - PI or Division Signature on award
  - Protocol approvals
  - Others

Department/Division Actions

Department/Division receives award notice
- Read NoA for key information
- WISPER Projects Tab completed
- Institutional compliance approvals in place
- Additional approvals (i.e., cross-campus collaborators)
- Division sign for award via “Division Action” tab in WISPER & process to RSP
  - Approve “Project Setup Approval” request [Approvals Tab]
  - “Request Project/Award Finalized of SPO” [Division Action Tab]
Project Set Up
WISPER Demo

Let's take a look in WISPER and see what we need to do...

Common Pitfalls

Frequent “snags” at Award Set Up
- Protocol compliance information not updated and listed in PLuS (i.e., prior award info; title not listed; IACUC congruence not complete)
- PI or Co-PI has outstanding effort tasks or needs to take a mandatory training
- Senior/Key Personnel have FCOI requirements to meet
  - For PHS awards, PI, RSP, and COI office are all involved
- PI or Co-PI overcommitted, especially in summer
- Cross-campus collaborations need to be figured out (budget, effort, etc.)

Finalizing Award Set-up

RSP Will do a comprehensive final review
1. Compliance (protocols, effort, FCOI, etc.)
2. Terms and Conditions
3. Internal approvals
4. Proper F&A rate applied
5. Effort
6. FCOI
7. Award Reporting Requirements
   - CFDA
   - Federal or Non-Federal
   - Classification (Research, Instruction, etc...)

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Finalizing Award Set-up

- WISPER is a tool for collecting all proposal and award information
- RSP Award Set Up Team will ‘generate’ the award from WISPER
- This transfers all information from WISPER over to the Grants Suite in PeopleSoft.

Information flow:
WISPER > Grants Suite > WISDM

Pre-Award tracking = WISPER
Post-Award financial system = WISDM

Resources

Award Setup: https://www.rsp.wisc.edu/awardsetup/
Effort: https://www.rsp.wisc.edu/effort/
Cost Share: https://www.rsp.wisc.edu/costsharing/

Bringing it all together

- Questions – Test your knowledge
- Group Exercise – Scenario
Questions?

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Thank you for coming!