Arkansas State University

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Site Visit Date November 17-19, 2014

About This Report

The National Council of University Research Administrators (NCURA) is a national organization of over 7,000 members. NCURA serves its members and advances the field of research administration through education and professional development programs, the sharing of knowledge and experience, and by fostering a professional, collegial, and respected community.

This document focuses on sharing knowledge and experience as a result of the recently conducted review of the research administration area of sponsored programs. Our objectives are to provide the institution with feedback on the institution's management in support of research and to share recommendations and national best practices that might be considered at the institution.

While the review utilizes the NCURA National Standards, the Reviewers recognize that policies and practices vary at institutions and that not all Standards are applicable to each institution.

The NCURA peer review process is based on interviews with various stakeholders involved in research and research administration areas of sponsored programs. However, the NCURA peer review process does not necessarily validate information or data provided by individuals or departments in preparing this report. Further, the NCURA peer review does not evaluate personnel, nor does it perform an audit function. The results of this review, therefore, should not be used to make human resource decisions. It should not be used to evaluate departments outside the scope of the NCURA review (and is thus limited to use in assessments of Research Administration/Office of Sponsored Programs). Nor can the use of the results help assure fiscal, regulatory, or ethical compliance with federal, state, or local regulations. The recommendations offered in this review report should not be construed as an exhaustive list as these recommendations necessarily represent an analysis by a particular set of Reviewers and at a single point in time and based on interviews and procedures and processes of certain stakeholders and Research Administration/Office of Sponsored Programs procedures and processes that are contemporaneous to the issuance of this report.

Just as a decision to follow a recommendation cannot ensure regulatory or audit sufficiency, a decision by an institution "not" to adopt one or more recommendations does not necessarily mean that the institution is failing to meet legal requirements. Rather, the recommendations reflect an opinion of peer research administrators who are active in the field and familiar with structures and approaches at other institutions. There may, however, be elements of the local history, environment, or culture of which they may not have been fully cognizant. This document does not provide legal advice.

NCURA does not warrant that the information discussed in this report is legally sufficient.

The **Executive Summary** provides an overview of the report. The **Current Environment for Sponsored Programs** section discusses the many influences and pressures that have recently impacted research administration and created some of the current stresses. The remaining sections provide a detailed discussion of the National Standards as applied to this institution and includes notable practices and recommendations throughout, along with the rationale for each.

NCURA will treat the contents of this report as confidential and will not disclose nor distribute the report outside individuals affiliated with the peer review program. There are no such restrictions on how the institution chooses to utilize the report.

Executive Summary

The National Council of University Research Administrators (NCURA) would like to commend Arkansas State University for undertaking an open and comprehensive review of the research administration infrastructure. The strong support for administrative efficiencies and accountability is evident with the decision of institutional leadership and the community to engage in a process that allows all members to participate and contribute.

The NCURA Peer Review Program is premised on the belief that it is a critical part of this review process to include experienced research administrators who have significant careers and are engaged nationally. This external validation allows ASU to incorporate best practices and models into their final action plans.

An evaluation of the research administration of sponsored programs was conducted at the request of Nikki Turner, Director, Sponsored Programs Accounting. The evaluation was performed in November 2014 (site visit on November 17-19, 2014; Appendix C for the Charge Letter and Appendix D for the site visit itinerary) by a Peer Review Team from NCURA (Appendix B for Bios).
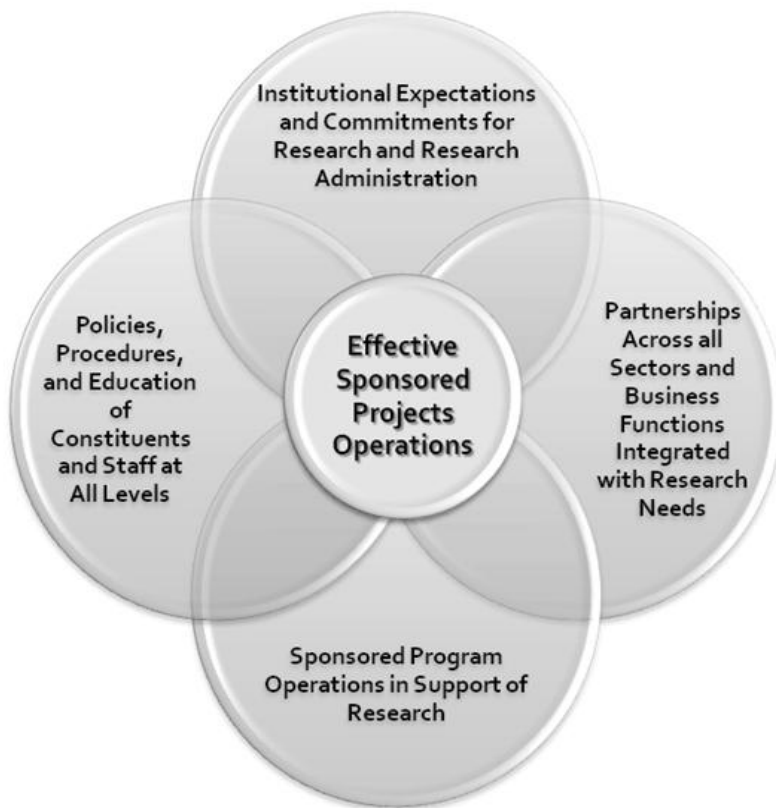
The evaluation was framed by the National Standards (Appendix A) for the research administration of sponsored project activities. These Standards cover institutional expectations and commitments, policies, procedures and education, the central and unit-level operations supporting research and scholarship, and the relationship and partnerships across all institutional functions

The Executive Summary addresses two broad areas: Institutional Philosophy and Research Administration Infrastructure.

Institutional Philosophy

With relatively new university leadership, this has been an opportune time for external assessment of the research administration infrastructure as relates to current activities and for supporting future directions. The University Strategic Plan was created prior to the current leadership and it appears to be creating some uncertainty across stakeholders. As relates to research, that Plan spoke to creating one Center per year and a 10 percent sponsored program award growth per year. There does not seem to be clarity on whether those goals are still in place or not or the viability for meeting these goals.

While the current strategic plan will continue to be in place for several years, a Research Strategic Plan can be developed and implemented. This is an important next step and the process and plan will help to guide many of the recommendations made throughout this report. Such a plan needs to start the research visioning and might be considered as a three year plan in order to align with the cycle for the next University Strategic Plan. A coherent research strategic plan would help inform the next University Strategic Plan when that process begins. Elements of a research strategic plan would be to consider defining areas of excellence that might lead to defining ASU niches. These areas of excellence would then be ones to build core strengths, performance measures, and specific College research plans.

A key component to assessing research support as the research strategic plan is envisioned is insuring that the staffing infrastructure and expertise is in place to support current and future directions. A common continuum for sponsored programs infrastructure has support seamlessly flowing through research development functions, pre-award functions, and post-award functions. Skills and knowledge for each area are critical for success and are somewhat different for each of the areas. Because of significant changeover in the pre-award areas, it will be an essential next step that these functions are mapped with capturing existing metrics on points in the process. This mapping will help assess redundancies and timeframes for support services and as well as how to best align responsibilities to functions. Attention needs to be given to the pre-award functions and to insure there is sufficient dedicated staffing effort specific to this area.

As part of the overall process mapping, assessing the touch points and shared activities between research development and SPA will serve to tighten the interface between these critical functions and to present a common face of service. Many areas of shared activities include review of proposal budgets, workshops and training, outreach activities to faculty, and policy and procedure development.

The funding model currently in place to support research administration is not a common model and a phased-in changeover to state dollars should be implemented. Committing F&A dollars to supporting core central administrative positions not only has eliminated available dollars to build and seed research initiatives but it provides an unstable funding base for critical services. Moving central administrative salaries to State dollars will bring ASU in line with funding models found with most universities.

Another aspect of institutional philosophy supporting research is the approach to risk tolerance. There are indicators of low risk tolerance that are not typically found in research universities, in both the level of involvement of Legal Counsel and transaction review and approval from SPA. While there may be reasons that have led to the current roles of both Legal and SPA, as research activity grows, these areas will need attention.

Research Administration Infrastructure

Integration of the various systems supporting the sponsored program functions need to be addressed in order to streamline the redundancies and level of effort. System integration includes electronic systems, oversight systems, and human resource systems.

➢ For electronic systems, such integration should engage both staff and faculty to insure that systems are meeting end user needs. Ongoing system maintenance should be a central priority.

➢ Oversight systems include the interface between sponsored project proposals and awards and the institutional commitments made for oversight on certain types of research (such as use of animals or humans in research, biosafety, or individual research financial conflicts of interest). Such interface requires that sponsored programs has appropriate approvals from relevant oversight areas for proposals and awards that contain areas covered under the oversight areas.

➢ Human resource systems include integrating the functions of departmental research administrators into overall roles and responsibilities. With department staff working at 50, 75, and 100 percent effort on research administration, this support area needs to receive training and understanding how their functions fit into overall institutional expectations for sponsored programs.

Another aspect of integration is assessing how the business functions of the University are able to respond to the often short-term needs of research. Many of the business functions, including HR hires, employment status forms, purchase orders, user fees, and P-cards, need to be considered in light of how they interface with research activities and what streamlining might be implemented.

Complimenting integrating the several areas already discussed is putting in place comprehensive policies related to sponsored projects. A thorough review of policies parallel to process mapping will help to identify appropriate placement of roles and responsibilities and associated authorities. To maintain regular feedback from faculty on policy and process, a faculty advisory committee for the Associate Provost for Research would be beneficial.

The notable practices and recommendations from the report are listed throughout the report. Each notable practice and recommendation includes a description and rationale.

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Current Environment for Sponsored Program Operations

Any institution that is focused on developing a more research-intensive program faces a number of challenges. On one front is the challenge to embrace the culture of the institution and those existing or emerging priorities as relate to sponsored program activities. On the other front is the challenge to build or sustain an infrastructure that can nurture, facilitate, and support the growing demands of a research enterprise and meet both faculty expectations and institutional accountability.

Any research enterprise brings a measure of risk, accountability, and oversight to the institution that has not been previously apparent. These measures are in response to a parallel growth in attention by the federal government that is evidenced by escalating policies, regulations, and oversight. This increased involvement of the federal government in sponsored programs oversight has resulted in the need for higher degrees of specialization and education on the part of institutional sponsored programs staff. Institutions now maintain a delicate balancing act between developing the infrastructure for facilitating and moving forward research activities of their faculty and providing sufficient oversight and internal controls to demonstrate accountability and to mitigate risk.

In the last five years, institutions have been especially impacted by the external environment. Reduced funding, increasingly large-scale and multi-disciplinary research, and collaborations with foreign scientists and business have all contributed to complex relationships and issues of ownership. The recent federal attention on institutional operations through audits, whistleblowers, and investigations has not only exposed our institutions to the public but has brought increasing levels of Congressional attention. The resulting attention on how institutions manage their relationships and the use of the public's funds often results in tighter institutional controls and more restrictive policies imposed on both the institution and faculty.

Many of our institutions are now recognizing that the growth of infrastructure and specialized expertise has not kept pace with the complexity of the current-day research relationships and the attention to government regulations and policies that are inextricably intertwined with the external funding.

The infrastructure supporting sponsored programs is always complex and it requires a periodic review to determine if it efficiently supports the efforts of investigators while also offering an adequate compliance posture with the regulations that underlie federal funding.

This general discussion of the current national environment within which all sponsored programs operations exist and the special challenges for transitioning institutions will serve as a foundation for the more specific discussion of this report.

I. Institutional Commitments

I.A. STANDARD for Institutional and Research Administration Planning.

> The institutional priorities and strategic plans as relate to research are clearly articulated and tied to action plans and metrics, defined by research administration, that will support and advance the institutional priorities. The relationship of research strategic goal successes and infrastructure commitments in areas that support research (such as seed or bridge funding, shared cores, release time) is understood by the institutional leadership. An institutional commitment to research and sponsored projects is clearly evident at all levels of the organization as appropriate to the culture, mission, and strategic plans.

Arkansas State University was founded in 1909 as an agricultural school. Currently, ASU is classified as a Carnegie Master's large institution offering more than 70 baccalaureate degree programs, approximately 50 master's degree programs, three professional doctorates and 4 Ph.D. programs. Arkansas State University enrolls approximately 13,500 students each year at its main Jonesboro campus. The University employs over 500 full time faculty and approximately 1100 full-time staff. Arkansas State has seen significant changes in institutional leadership since 2012 and is guided under the strategic plan developed in 2010.

It appears there is a broad consensus that the current strategic plan no longer accurately reflects the University's research agenda. The existing plan was developed under prior leadership and at a time when the environment for higher education, in general, and sponsored research, in particular was healthier than at present. Related goals articulated in the Strategic Plan Action Steps were ambitions, and perhaps unrealistic, even for the time. Nevertheless, there appears to be clear recognition among the institution's current leadership that growing the University's research base is a high priority. Generation of external funds is expected to be an increasingly important factor in allocation of funding from the state. There is a great desire among academic leadership that Arkansas State be a very strong second, only to the University of Arkansas, when it comes to external funding. It should also be noted that there exists a cohort of exceptional faculty who, given adequate support, are anxious and excited about moving the research agenda forward, a number of whom have achieved remarkable success during a particularly challenging time. However, the uncertainty surrounding the exact status of the strategic plan with regard to research is leading to "mixed messages" to the faculty. Given competing demands on faculty time, clear expectations are essential and the Colleges are to be commended for taking important steps in clarifying research expectations of faculty within their units.

Although, unit and area strategic plans typically flow out of the University plan, the current state may present an opportunity to turn the normal process on its head and develop a research plan that will then go on to shape the University strategic plan. At institutions looking to move from traditional teaching institutions to emerging research institutions, this process may have some advantages.

- **Recommendation: Under the leadership of the Graduate Dean and Associate Provost for Research, the University should develop a research strategic plan that engages the research and academic community and reflects the University's desire for growth in external funding.** The plan should include realistic goals for key metrics, expectations for faculty and appropriate levels of institutional support. Part of the plan will be to establishing priorities for implementing many of the recommendations that follow in this report and developing a phased in funding plan.

An important consideration in the implementation of the research plan is the assurance of resources commensurate with the goals and expectation of the plan itself. In speaking with representatives across the University, it is clear that there are challenges in terms of institutional support for research. On the positive side, the University has recognized the need to plow resources collected through Facilities and Administrative (F&A) costs back into the research enterprise. The share-back plan, in principle, provides key resources and flexibility to academic deans as well as the chief research officer. However, one of the challenges is the University's response to the decline in F&A funds from the reduction in funds tied to federal appropriations, which typically provided the University's fully negotiated F&A rate. Decisions based on the expected increase in the F&A funding returned to the University are now hampering efforts in an era where F&A funding has markedly decreased. This in turn has led to reduced staffing levels (to be discussed in greater detail under Section I.C) and reductions in seed grants and reassigned time dedicated to research, among others.

A prior review of research administration conducted in 2009 also noted that internal grant programs did not establish seeking of external funds as an evaluation criterion for receiving support. It was noted that the base level of $40,000/year in seed grant funding was often supplemented by additional funds in the past, but those funds have now decreased. Finally, the research committee charged with making the awards has been focused on awarding larger "high impact" grants, but there doesn't appear to be measures in place to determine the impact of seed funding in terms of generating external funding.

- **Recommendation: ASU should consider strengthening its internal seed grants program with a goal of moving base line funding from $40k to at least $80k over the next several years. Programs should align with objectives of moving faculty from seed grants to developing external proposals.** Part of a plan may consider a 2-tier system of funding: a lower tier to meet the scholarly needs for disciplines that

traditionally require lower levels of funding (and limited opportunities) and a higher level with specific expectations for seeking external support.

The institution also faces significant challenges in the development and reporting of research metrics that can be used to assess the University's progress. The focus of current performance metrics appears to be mainly financial data: total dollars awarded, total expenditure, F&A collected, etc. Although these metrics are important, they have limitations in their ability to monitor key trends. For example, at most smaller volume institutions, the gain or loss of one or two major awards can greatly affect metrics based on dollar values. The statistical validity in measuring institutional progress is, therefore, suspect.

A key indicator for institutions making the transition from "teaching" institutions to more research active is the level of faculty participation in the process. Therefore, metrics such as number of faculty (or percentage of faculty) submitting proposals, number of new faculty submitting proposals, and number of proposals submitted are typically less subject to large statistical fluctuations and can be more meaningful measures in determining trends. Over the long term, these measures should correlate to the financial metrics currently in use. In addition, they have the benefit of sending the message that the level of engagement is the important factor and conveys a message that this activity is important for all faculty. With the focus on dollar amounts alone, it is sometimes too easy for faculty to think that generating funding is the responsibility of some other unit or research center, and not part of a campus-wide focus.

- **Recommendation: ASU should consider implementing an expanded set of well-defined research metrics that measure campus engagement in the research enterprise as well as financial data associated with external awards.** Reports on performance should be distributed at least annually to academic leadership (deans and chairs) and displayed at the University, college and departmental levels.

As these metrics are developed, greater efforts can be made in distributing the information to campus leadership and the wider research community. Several conversations indicated that data consistency may also be an issue. Adopting more uniform and consistent methods for collecting and reporting pre-award data is important. On the post award side, the research community may benefit from the distribution of regular (monthly) expenditure reports to PIs and departmental research administrators across campus. It also appears that effective collection and distribution of research data may be somewhat limited by current levels of software support for the RTT office, in particular. These limitations are discussed in more detail in Section VI.

I.B. STANDARD for Research Administration Organization.

The institution has identified offices and structures that support the overall administration of the research enterprise and, in particular, the management of externally sponsored programs. The institution has defined roles, relationships and authority between offices where institutional functions in different arms of the institution may overlap with research administration. Effective operational processes exist between sponsored program activities and business functions. As appropriate to the organizational structure, senior research leadership is represented in key academic and institutional groups. Where sufficient research volume and activity warrant, the institution has addressed school, college, department, or center needs for the research administration infrastructure that resides in those units.

The research administration structure at ASU follows commonly accepted practices for organization. Pre Award and non-fiscal compliance are a part of Academic Affairs and report to the Provost through the ~~Dean of the Graduate School and Associate Provost for Research (APR)~~Vice Provost for Research and Graduate Studies (VP). The ~~APR~~ VP sits on a wide range of high-level University councils and committees, giving strong representation of the research enterprise to the campus community. The director of the Pre-Award office (RTT) has been in the position for ~~2 years~~6 months and is responsible for day-to-day operations of the office. Post award functions report up to the Vice Chancellor for Finance and Administration through the Controller's Office. The director of the Post- Award office (SPA) has been in her current position for 3 years and is responsible for day-to-day operation of the post award office.

The dual reporting structure has the advantage of stronger internal controls and works well as long as there is good communication between the pre and post award offices. This certainly appears to be the case. The Directors of RTT and SPA clearly have developed a collaborative working environment that is enhanced by the quality of the physical spaces as well as their proximity to each other and central location on campus. Lines of authority appear to be clearly established and understood at all levels within the central research administration structure.

There appear to be a number of opportunities for process improvements in moving away from central research administration to other supporting offices. As example, a uniform cause for concern is the recent rollout of the travel and expenditures model, particularly as it relates to travel reimbursement review and approval. Faculty report much more time spent on documenting travel and entering information into the system. A more difficult issue is the complex routing and approval process, which sometimes must be done on a case-by-case basis when there are multiple PIs or where activities cross multiple departments, units, or fund codes.

PIs and departmental research administrators also expressed frustrations over HR processes as they relate to hiring on grants. A particular area of concern was the time required for processing Employee Status Forms (ESFs). Departures from "normal" institutional requirements for processing ESFs as they pertain to grants do not appear to be clearly documented in University Standard Operating Procedures. There also

appears to be a nearly exclusive reliance on physical forms that may get inappropriately routed or, sometimes, even lost.

- **Recommendation: ASU should consider establishing a cross-departmental working group to review standard operating procedures of supporting offices as they relate to externally sponsored awards.** This group should include representatives from HR, procurement, departmental research administrators, PIs and central research administration staff. Distinctions in approval processes should be made between individuals and offices where approval is required vs. where approval is simply for informational purposes. The group should consider cases, where signatures may be accepted through scanned electronic documents rather than routing of original paper forms. Moving to electronic routing of forms, even through simple means such as scanned documents submitted via email, can greatly assist in the tracking of documents as they move through the approval process and greatly reduce the time required.

The interaction between the RTT office and the Office of Legal Counsel is perhaps the greatest opportunity for organizational and process improvements. As also discussed in Section X.A., it is estimated that approximately 80% of the documents related to sponsored programs award administration are subject to legal review. These include all contracts and agreements, non-disclosure and material transfer agreements, subawards and vendor agreements, among others. Processing time for many of these documents vary from a few weeks, to several months, in many cases. These exceedingly long processing times can have adverse effects on award performance. They also undermine confidence in the institution from research partners due to the unusually long delays and complexities in establishing and negotiating inter-institutional agreements.

Current effectiveness is limited by the fact that the legal office serves the entire system and, therefore, does not maintain an office on campus. It also seems clear that the workload on the legal staff is substantial. It is encouraging to note that process improvements are already underway in that a legal office is being established on the Jonesboro campus. Our understanding is that the office would be located in the same suite of offices currently occupied by RTT/SPA staff and it is our strong recommendation that this occur.

- **Recommendation: ASU should consider broad measures to enhance the effectiveness of handling legal matters related to sponsored agreements.** The University should continue to explore and adopt widely accepted templates for subawards established by the FDP and adopted by a number of public universities within the state. Other existing templates should be reviewed and acceptable alternative clauses might be considered for identified clauses that are often contested during contract negotiations.

The establishment of an on-campus office provides greater opportunities for a comprehensive review of practices associated with legal review. RTT and the Office of Legal Counsel should consider joint training exercises and other professional development opportunities for establishing a greater sense of confidence between the two offices.

- **Recommendation: The RTT office should work collaboratively with legal to establish expertise in basic contracting with RTT staff and to establish a process to monitor documents currently under legal review with regular status reports on progress.**

Roles and responsibilities between the sponsored programs administration and the University foundations are articulated in the University's Governing Principles to Differentiate Between Sponsored Programs and Gifts. The Associate Director of Foundation Relations is new to the position but has a good working relationship with RTT staff. One area for further conversation may be a process for clearly identifying the roles of the respective offices when faculty are seeking support through gifts from foundations that do not meet the dollar level thresholds typically pursued by the University Foundation. In some instances, sponsored programs staff provided support to faculty seeking small foundation gifts. Given the workload on the RTT staff, taking on these additional responsibilities may be counterproductive to the operation of the RTT office and consideration should be given to delegating this responsibility to departmental or other unit administrators in instances where support is not provided by the Foundation itself.

There also seem to be well-established roles and responsibilities between central research administration and departmental research administrators (DRAs). The DRAs interviewed are highly committed to supporting the research enterprise and work well with both the RTT and SPA staff. Communication between research administration and DRAs, department chairs and deans tends to be informal. Additional information on the means and effectiveness of communications as they related to sponsored programs are described in greater detail in Section II.

I.C. STANDARD for Research Administration Staffing.

The institution has invested in sufficient number of staff to support the core functions of the sponsored programs operation and to meet the obligations to sponsors. The institution has an appropriate research administration staffing plan that contains elements of recruitment, retention, and succession for key positions. Clear expectations exist for training appropriate to responsibilities for all level of staff and at central and unit levels.

Nearly every discussion touched, in some way, on the level of staff support for the research administration offices. Questions on the levels of staffing are inherently

difficult to answer and staffing levels vary widely among institutions. Factors to be considered are the volume and complexity of the research portfolio, the desired level of service to be provided, the level of administrative support in departments and units, and the extent to which offices rely on electronic and/or automated functions. Those factors notwithstanding, it is evident that the current level of staff support is placing significant strains on the research administration infrastructure. The following analysis will examine the current practices in funding staff positions and examine the current staffing levels and structures of the RTT and SPA Offices.

Under previous leadership, a decision was made to fund staff positions in RTT and SPA exclusively through F&A. While this model can work in institutions where there are long-term, sustainable increases in F&A funding, it can be extremely challenging when declines in F&A threaten even the base level of support, as seems to be the case in this instance. For this reason, few institutions, particularly Predominantly Undergraduate Institutions (PUIs), adopt this strategy for supporting staff positions in research administration. In ASU's case, the significant decrease in F&A due to the decline in funding through congressional appropriations and other federal sources have resulted in a reduction of staff in both the RTT and SPA offices to a level where the ability to provide effective service is at risk. A secondary outcome is that the downward trend in F&A funding can compromise the institution's ability to attract and retain quality staff as current staff look to other units for more secure positions. While reversing the decision is simple in principle, it can be difficult to implement, in practice, once the former funding streams for the staff positions have been reallocated to other units within the University.

- **<u>Recommendation</u>: ASU should consider transitioning to a hybrid model for funding staff level positions in the RTT and SPA offices. Institutional funds should be used to provide secure funding for the level of staffing required for effective baseline services.** F&A funds may be considered for some positions to respond to future growth in the University's research portfolio. It is suggested that a minimum of 2 positions be converted from F&A to institutional dollars in each of the next 2 to 3 years.

The RTT Office is comprised of the units for Compliance, the Catalyst Innovation Accelerator, and the Office of Research Development (ORD). The ORD handles proposal development, budget support, pre-award services, and award processing. It also assists with a wide range of University initiatives such as managing publications related to research and organizing the Create@State annual symposium. ORD currently consists of 3 FTE staff, a Director, an Associate Director, and a Research Program Coordinator, and also utilizes the services of two graduate assistants. The office previously included a Research Development Specialist position. ORD staff have made significant strides to improve the reputation and level of service provided by the office and those efforts have not gone unnoticed. Faculty, DRAs and members of the administration repeatedly praised the excellent work done by the staff.

The strength of the ORD staff is in providing proposal development services to the faculty. The responsibilities of the Director and Associate Director overlap somewhat which is appropriate given the level of faculty support that is needed. The area most in need of additional staff support is award processing, where significant gaps in service exist. This person needs to be responsible for reviewing grant terms and conditions, initiating contacts and following up with subawardees, working with the Office of Legal Counsel in expediting review of contracts and agreements. As awards are processed, they need to be immediately forwarded to SPA for set-up. This award, or grants and contracts, specialist should be an integral part of the hand-off team and serve as a resource for faculty by providing information on specific terms and conditions, working with appropriate offices to assure compliance measures are in place, and providing other assistance as needed.

- **Recommendation: ASU should consider adding a position of grants and contracts specialist whose primary responsibility is processing awards and all supporting agreements in a timely fashion.** The specialist should have expertise in understanding terms and conditions of grants and contracts and work closely with the Office of Legal Counsel in expediting agreements through the institutional approval process. The specialist should also work closely with subawardees and other partners to actively monitor the progress of these agreements as they move through various approval processes and work to expedite these agreements so that research partners can be engaged in active work much earlier in the process. Agreed upon turnaround times should be established and used for the monitoring basis (review of peer institutions can provided expected turnaround times for agreements).

The Sponsored Programs Accounting (SPA) Office is responsible for approval of all grant and contract expenditures, fund balance reviews, invoicing, and financial reporting. SPA currently consists of 4 FTE staff, a Director, two Sponsored Programs Accountants and a Sponsored Programs Analyst. The office recently lost a third Sponsored Programs Accountant who moved on to become the Director the Research Compliance office and the position was not replaced. SPA staff have managed the increased workload but have had challenges in providing consistent levels of service. Each accountant manages over 200 separate awards. Staff are extremely dedicated and have high levels of expertise but the substantial workload leads to high levels of stress, particularly at peak times. Grant accountants do not always have adequate time to review expenditures which has led to the need to make judgments on the appropriateness of some costs without input from the PIs, leading to strained relationships in some instances. Routine levels of support offered at other institutions, such as providing PIs with monthly expenditure reports, cannot be provided given the current level of staff.

- **Recommendation: ASU should consider adding back the third Sponsored Programs Accountant position and consider offering expanded levels of service, including monthly expenditure reports, to the research community.**

Staff retention is an area of concern. Of the current ORD and SPA staff, only one person has been in the position for more than 4 years. There seem to have been a number of factors related to the high turnover so there is not a single area that calls out for particular attention. As the most recent staff losses have not been replaced, the institution's ability to recruit new personnel in these important positions is difficult to determine. However, given the high workload and relative insecurity of staff positions funded through F&A, the institution may have difficulties in continuing to recruit high-quality staff. The issue may be particularly acute in SPA where the path to career advancement is less evident and where there are perceived inequities regarding compensation within the unit itself, due to dissimilar job classifications for similar positions, and with respect to positions of similar responsibility within RTT.

- **Recommendation: ASU should examine compensation levels and job classifications for the Sponsored Programs Accountant positions and address any identified inequities.** This examination should be mindful of the fact that there is a specialized skill set for these positions that may warrant compensation levels above those of other accountant positions within the university

Training programs for central and unit level administrators are relatively strong. RTT and SPA staff has opportunities for training and professional development through the University itself, as well as through professional organizations and conference participation. All members of the central staff participate in NCURA's Research Fundamentals program at the earliest opportunity and both Directors have participated in NCURA's SPA II training. Continued professional development is expected throughout their careers. The RTT (SPA was also part of this training)staff conducts trainings for departmental research administrators based on the model of their Institute for ~~Research Development~~Departmental Research Administration. Some DRAs indicated that this training has been extremely helpful and suggested that it occur as soon as possible for new DRAs. Given the importance of post-award functions for DRAs, some consideration should be given to expanding the role of SPA in training for departmental administrators.

I.D. STANDARD for Research Administration Resources.

> The institution has in place a process to identify changing resource needs for research administration as relates to changes in the institutional priorities and the external environment. Such resources encompass staffing, space, information technology, and financial resources to support the staff in carrying out their sponsor program functions.

The University considers requests for additional resources through its normal budgeting processes. Requests for specialized programs or initiatives are also considered on an informal basis and both the Provost and Vice Chancellor for Financial Affairs have been generally responsive, in spite of a difficult funding environment. Support for professional development is a high priority, which is particularly important given the number of staff in relatively new positions. The two primary areas of concern are the staffing levels, particularly as related to the reliance on the F&A revenue as the funding source as described above, and the need for additional IT resources which will be discussed in more detail in Section VI.

The RTT and SPA Offices are currently located on the sixth floor of the Dean B. Ellis Library. The offices were moved to this location from the Arkansas Institute for Biosciences approximately two years ago. The current space allows for close collaboration between the RTT and SPA offices and has an excellent conference room and dedicated work areas. The relocation from ABI to the Library sends a strong message that the importance of research extends beyond the research centers themselves and is integral to the University mission. The anticipated location of the Office of Legal Counsel into this suite of offices can only help in enhancing the effectiveness and efficiency of research administration operations.

- **Notable Practice: ASU has provided exemplary space and facilities to support the research administration enterprise on campus and the central location sends a strong message to the campus community on the importance of the research mission.** University officials should continue to give strong consideration to locate the Office of Legal Counsel within this suite.

II. Institutional Communications

II. STANDARD for Institutional Communications.

> The institution recognizes the importance of establishing mechanisms for timely, regular communication regarding sponsored programs trends and activity levels, policies and procedures, expectations, roles and responsibilities, changes in policies, and risk areas. Appropriate lines of communication exist between the institution's senior research administrator and the institution's overall senior leadership team. The institution has defined mechanisms that make available information about research activities and successes to the public.
>
> Research administration provides regular communication to faculty and staff as well as opportunities to provide feedback. Current policies and procedures are readily accessible via websites and other means. Strong communications exist between central offices and unit-level staff, where such exists.
>
> Research administration periodically assesses the effectiveness of their communication practices.

The institution tends to rely on informal mechanisms for communication policy and procedural changes from sponsors or the institution. Regular meetings between SPA

and RTT staff help to assure consistency in communications related to sponsored programs' issues. Reliance on informal means of communication seems to be generally effective due to the close relationships between faculty and RTT/SPA staff.

Engagement of the Associate Provost for Research at the highest levels of administration provides an adequate mechanism for communicating areas of concern surrounding implementation of new requirements or regulations and areas of compliance risk, as well as institutional updates on research productivity. The institution does an exceptional job of communicating highlights of research activities to the campus community and the general public through its MEASURE magazine and the Create@State annual symposium.

- **Notable Practice: ASU does an exceptional job of promoting the research of its faculty, staff, and students to the campus community and general public through the MEASURE magazine and Create@State annual symposium.**

Faculty and staff concerns are typically expressed directly to SPA/RTT staff and response to concerns appears to be satisfactory. There were very few concerns expressed over internal communications between RTT/SPA staff and the research community. As the institution moves forward in broadening the participation in research, these informal means of communication should continue to be assessed on a regular basis. RTT/SPA staff takes great pride in their abilities to communicate with the research community and have established communications as a high priority. RTT/SPA staff should continue to build on the partnership with DRAs by offering follow up "refresher" training and continue their efforts to include DRAs in professional development programs offered to the campus community. The DRAs can also provide an effective sounding board for assessing the effectiveness of campus-wide communications.

Both RTT and SPA publish information on their respective websites. The SPA website provides information on a broad array of University guidelines and procedures. The A-State Research Minute video segments are excellent. The website does an exceptional job of providing information on the issue of effort certification that includes general information, a user guide, procedural document and a section on FAQs. SPA and RTT staff should give strong consideration to expanding this approach to other topics. For example, there seems to be at least some confusion over the interpretation of cost sharing among the research community as well as best practices for hiring employees on grants, procedures for approval of ESFs, export control, and the travel reimbursement process. Eventually, these topics could be combined to constitute an online researcher's handbook that would greatly benefit both individual researchers as well as department research administrators.

- **Recommendation: The RTT and SPA staff should move forward in developing an online resource manual based on the example provided by the Effort Certification information and continue development of their One-Minute video modules.**

III. Research Administration Policy Development

III. STANDARD for Research Administration Policy Development.

> The institution demonstrates a process for policy development that is transparent; for those policies not proscribed externally (such as by specific federal regulation). Policy ownership and the associated approval process are clearly established.
>
> Where sufficient research volume and activity warrant unit-level research administration support, the institution has established the relationship of central policy to college, department, or center policy and practice.

Note: ASU uses specific language to differentiate policies governing the system and those governing the institution, referred to as Guiding Principles. For the purpose of this discussion, the use of the word policy is synonymous with the ASU Guiding Principles.

The institution has a transparent, clearly defined process for policy development and approval that relies heavily on the shared governance model. Policies related to sponsored program administration are reviewed by the SPA policy committee under the guidance of the University's Shared Governance Oversight Committee (SGOC). This model allows adequate time and opportunity for input from all stakeholders. The relatively low activity level of the SPA committee was cited on several occasions and there were comments about whether or not the makeup of the committee adequately represents all aspects of the research and research administration communities.

Policies are generally well written and follow a standard format. For the most part, responsibilities and relationships among colleges, departments, and centers are clearly defined. The set of policies governing sponsored research is sufficiently broad to cover most major issues with two possible exceptions:

➢ There does not appear to be a clear policy on defining personnel who are eligible to submit proposals on behalf of the University nor does there appear to be a policy on handling of cost transfers. We have an Expense Transfer Procedure published on our website - http://www.astate.edu/dotAsset/972b9260-33b3-4344-9f7b-104dbaf0c515.pdf .

➢ The impending change over to the new OMB Uniform Guidance presents an opportunity for a comprehensive review of all policies related to sponsored programs activities. Polices

should be updated to reflect the changes in administrative structure that have occurred since the time when the original polices were implemented.

There are two additional elements for each policy that ought to be considered. The first would be a "Last Revised" date that indicates when the most current version of the policy took effect. The institution might also wish to consider adopting a review cycle so that all policies related to sponsored research are subject to periodic review. The second element would be to include a final Interpreting Authority, who is the person or office responsible for making determinations when questions about interpretation of the policy occur or exceptions when circumstances warrant. It would also clarify "ownership" of the policy

- **<u>Recommendation</u>: ASU and its appropriate governance bodies should review the current composition of the SPA policy committee and recommend changes to the membership as warranted.** Additional representation might include RTT and compliance staff, one or more Departmental Administrators, Legal Counsel, and appropriate representation of appropriate offices under Business & Finance in addition to faculty membership. The newly constituted committee should be charged with initiating a comprehensive review of all ASU Guiding Principles governing sponsored programs activities.

IV. Program of Education About Sponsored Programs

IV. STANDARD for the Program of Education About Sponsored Programs.

The institution has established programs of education for staff, teaching and research faculty, postdoctoral fellows, and graduate and undergraduate students, as appropriate, regarding institutional and sponsor expectations for the conduct of sponsored programs and research. The institution has on-going educational programs for unit-level (department, college, center, other) research administrators where such exist.

Research administration recognizes the importance of introducing new faculty, staff, senior administrators, and unit-level research administrators to appropriate research resources and information. Mechanisms are in place to identify such individuals.

As the University seeks to expand its research and sponsored program portfolio, so should it expand its efforts to ensure that its research administration staff, at all levels, are well-prepared to serve as a source of high-quality information on funding trends, sponsor regulations, and institutional processes.

- **<u>Notable Practice</u>: Research administrators across the University, at the central and department level, understand the importance of keeping current with**

regulations and with best practices. Research administrators at the central level (in RTT and SPA) attend formal training sessions as time and budgets allow, including in-person training for which travel is required and Webinars to which they can "tune in" from their desks. Central staff members attend Society of Research Administrators International meetings and the NCURA Fundamentals of Research Administration sessions. SPA has also attended FRA Conferences and the NCURA National Meeting. This is to be commended, but in order for research administration professionals across the university to provide the highest level of service, they must all make a commitment to regular training, on institutional policy and practice, sponsor regulations, and best practices in the field.

- **Recommendation: Central research administration staff members should develop, with their supervisors, an annual plan for training activities. Completion of their annual training plans should be a factor in their yearly performance reviews.**

Staff members have a good understanding of what's required of them to do their own jobs well, but could provide a better service with a better understanding of the "overall picture" of research administration. Pre-award staff members should plan to attend at least one training session each year intended for post-award research administrators so that they may gain an understanding of how their actions at the pre-award stage impact award administration and post-award administrators' jobs. Likewise, post-award research administrators should attend at least one training session each year intended for pre-award research administrators so that they may better understand the stresses involved in pre-award administration.

In speaking with DRAs with research administration duties, the Reviewers found that individuals are committed to their duties, have a service attitude toward the faculty members in their departments, and are eager to provide the highest level service possible. They are eager to do their jobs to the best of their abilities, to decrease the administrative burden on their faculty members, and to truly understand the infrastructure within and system with which they work. Receiving timely information that helps them better serve their faculty members is a priority for them.

- **Notable Practice: Both SPA and RTT staff members include information on new or revised sponsored programs procedures, regulations, and resources in their scheduled training activities.** Such information is also distributed through listservs, AState Daily Digest newsletter email, MEASURE Quarterly, and is available on the two offices' Web sites.

Although information is made available and accessible, department level research administrators did express some level of frustration at the lack of standard and consistent communication with them and of formal training available to them to help them provide the level of service they would like to provide. They do not feel that they are consistently informed of changes in procedures and often do not learn of a change

until they are told they've followed the wrong procedure in attempting to complete a transaction.

- **Recommendation: Require formal training in the administration of sponsored awards for all new department level staff members who will have research administration duties.** This should take place soon after the staff members begin their employment at AState. Administration should consider requiring training on the use of Banner before giving access to the system.

Formalized training for research administration staff within the departments should include information on System policies, institutional procedures, technology systems and tools, compliance requirements, areas of special risk to the institution, resources available to them to assist them in carrying out their responsibilities, and points of contact for questions and assistance. Requiring such training will ensure a group of well-prepared administrators who can relieve faculty members of the administrative burden of managing their awards so that the faculty members can focus on carrying out their projects. It will also relieve central staff in Sponsored Programs Accounting (SPA) of the need to review every detail of every transaction so that they can devote the bulk of their time to the duties that cannot be carried out at the department level.

- **Notable Practice: Department level staff members are currently meeting informally as a group and using each other as a resource when questions arise.** Informal meetings are an excellent way for department level research administrators to share knowledge, work out problems, and help make each other's day-to-day work easier. This is a first step towards developing a better-prepared staff at the department level.

- **Recommendation: Department level staff members with research administration duties should formally organize, with an official charge from the highest levels of administration, a research administrators' group that meets regularly to discuss issues facing them each day as they carry out their work, changes to institutional procedures and systems, and changes to sponsor systems and regulations.** These professionals would benefit by having a more formalized support system. They could use the group not only to answer questions and share best practices, but also to formalize their practices and create manuals or guidelines for new staff members.

Central to success in increasing sponsored program funding is outreach to faculty members, and especially to junior faculty members and those new to the institution, to offer assistance with their research and grantsmanship needs.

- **Notable Practice: Research and Technology Transfer (RTT) staff members participate in the overall new faculty orientation and provide a robust schedule of workshops, including workshops specifically intended for new faculty members. They attend college-level meetings and are committed to getting out to meet faculty members to make them aware that help is available for them.**

RTT staff members are to be commended on their efforts at reaching the faculty, and specifically new faculty members. A high level of visibility for central pre-award staff is vital if faculty members are expected to make optimal use of the pre-award services available to them in pursuing potential funding opportunities. New faculty members preparing to start a program of research need concentrated assistance in "getting started;" if they do not have the support they need when they begin their careers, they may become frustrated and revise their career plans, concentrating on aspects of scholarship other than grantsmanship.

- **Recommendation: So that faculty may have a complete understanding of the entire award life cycle, of both private and governmental awards, RTT and SPA should work with advancement personnel on developing joint training sessions covering both pre- and post-award issues.** This will not only provide a better learning experience for the faculty members participating in the training, but will also provide staff members of the three offices a better understanding of each other's roles and responsibilities in the award life cycle, ultimately leading to better award management and reduced faculty administrative burdens.

Because the University has traditionally focused on teaching, there is no formal research mentoring program in place for faculty. The University did not have a robust research culture when faculty members who are currently at the associate professor level were hired, so there is no "pipeline" of mentors available to new faculty, to provide either formal or informal assistance with grantsmanship and research needs. There is a new faculty orientation program, through which the Interactive Teaching and Technology Center (ITTC) Faculty Center runs seminar-type training monthly; however, this is an overall orientation program and does not focus on research or grantsmanship needs.

Research and Technology Transfer (RTT) staff have been taking on the overall responsibility for research mentoring and advising on strategy and proposal content, direction, and quality for new as well as established faculty. This is not within the scope of most central research administration offices' responsibilities and should be addressed elsewhere so that all faculty members, but especially those new to the institution, have the level of support they need available to them.

- **Recommendation: Arkansas State University should institute a formal mentoring program for junior faculty members to allow them give them the background and resources they need to seek appropriate funding opportunities, make connections with agency/funder staff, prepare competitive proposals, and carry out funded projects.** Such a program could pair mentors from within or outside the University with new faculty members as they begin to implement their research agendas. Since there is not a large pool of experienced investigators available to serve as mentors to new

faculty members, funding for this program might be dedicated to travel to meet with an external mentor

- **Notable Practice: During the past three summers, RTT staff members have carried out an Institute for Research Development.** This is an intensive and robust educational program that assists participants in identifying funding opportunities, creating appropriate biosketches, and discussing research interests with potential funders. Participants are offered an incentive for their participation. RTT follows up on institute activities only when former participants seek proposal assistance at some later time. The existing relationship with former participants facilitates smooth proposal preparation and submission.

- **Recommendation: RTT should continue to offer its Institute for Research Development; it should add a follow-up component to the Institute to help participants maintain the momentum that is built through such an intensive summer experience.** Follow up will allow RTT staff members to remain current on former participants' funding interests and strategies so that they may provide them with the highest level of service in their continuing pre-award needs. It will allow them to make connections among and between faculty members and to keep former participants informed of the most appropriate funding opportunities.

V. Assessment and Institutional Preparedness

V.A. STANDARD for Risk Assessment.

> The institution periodically assesses risk tolerance of research activities and emerging risk areas. The institution periodically reviews sponsored program policies and performs appropriate audit and assessment activities. There is an expectation for a regular and thorough assessment of the effectiveness of the sponsored programs operation. The institution has mechanisms to monitor the national landscape for emerging areas of risk.

ASU does not currently have a plan for periodic review of policies and procedures related to sponsored programs activities. A number of existing policies still refer to offices and University officials that are no longer part of the ASUs administrative structure. Section III of this report provides specific recommendations for a comprehensive review of institutional policies governing research under a newly constituted SPA policy committee. Once the review process is complete, the institution should consider conducting an annual assessment of risk following the issuance of each year's A-133 audit.

Periodic risk assessments are conducted on an "as-needed" basis through meetings of RTT staff, the Vice Provost for Research and the Office of Legal Counsel. As part of a research strategic plan, the institution should consider adopting a more formal risk assessment strategy. ASU should consider expanding the current risk assessment group to include representatives from SPA, Internal Audit, the Director of Compliance, and the Controller to meet at least annually following each A-133 audit report. In addition to reviewing areas of high risk, including risks associated with the Arkansas Biosciences Institute and other centers, the group should also consider existing procedures in low-risk areas to determine areas where more flexibility may be permitted.

- **Recommendation: ASU should consider forming a risk-assessment group consisting, at a minimum, of the Vice Provost for Research, Legal Counsel, RTT Director, SPA Director, Controller, Internal Audit, and Director of Compliance to conduct an annual risk-assessment review following each completed A-133 audit.**

An assessment of the effectiveness of the sponsored programs office was conducted in 2009 through a prior NCURA Peer Review site visit. It is evident that consistent progress has been made since that time. As the institution moves forward in developing a comprehensive strategic plan for research, an assessment of sponsored programs operations by internal stakeholders should be part of that process. Internal surveys, and in particular, small focus groups, may be particularly useful in identifying areas for further process improvements. The strategic plan should also suggest mechanisms for periodic assessments of sponsored programs operations from the research community.

- **Recommendation: As part of developing a comprehensive strategic plan for research, ASU should conduct an internal assessment of sponsored programs operations from the research community.** Once developed, the internal review process should become part of a periodic assessment of sponsored programs operations.

SPA/RTT staff carefully monitor changes in the regulatory environment through participation in national professional organizations, such as NCURA, and makes recommendations for policy and procedural changes in response. A current example is the review of procedures by RTT/SPA staff that stem from the transition to the new Uniform Guidance regulations.

V.B. STANDARD for Institutional Preparedness for Research Disasters or Media Exposure.

> The institution has a disaster recovery and emergency preparedness plan. Research activities are included in the plan. The institution periodically assesses its preparedness for disasters and insures that appropriate areas are informed. As appropriate to the breadth of activity, the institution has a written and communicated media-response plan.

The institution has a comprehensive Emergency Operations Plan that includes biohazard incidents, chemical spills, release of radioactive materials, considerations for animal care and facilities, and a research recovery plan following natural disasters. The plan includes clear areas of responsibility, checklists for addressing a broad array of possible incidents, and clearly defined training requirements for key personnel, as well as a well-defined plan for communications. The institution's Hazardous Materials Officer is a key member of the disaster response team, and he also serves in on the Research Compliance Oversight Committee that includes the Director of Compliance and chairs of the IRB, IBC, IACUC, and the University officials responsible for Conflict of Interest and Research Misconduct. Areas of concern regarding emergency procedures and response are routinely handled through the Compliance Oversight Committee.

- **Notable Practice: ASU has an exemplary plan for managing emergencies and adverse events related to its research enterprise.**

VI. Information Management

VI.A. STANDARD for Information Systems Supporting Research Administration.

> The institution has in place appropriate information systems for research administration and sponsored programs and has processes that integrate proposals, awards, financial management, and compliance reviews. Appropriate to the volume of activity, the institution has implemented electronic systems that are integrated. The institution periodically assesses research administration technology needs.

The use of technology in support of the University's research enterprise came up repeatedly in conversations. Senior-level administrators in Business and Finance consider IT support as an area where the institution is "very lean." At one point, the RTT office had a full-time staff member dedicated to IT support but that position has been lost due to budget constraints. The responsibility for compiling reports and other data extraction now falls primarily on the Associate Director of RTT and data collection appears to be time-consuming and cumbersome. Challenges surrounding data reporting are discussed in more detail in Sections VI.B and VI.C.

The institution uses Banner as its enterprise software system, and it is the primary system used by SPA in data management and reporting. Banner, however offers limited support for pre-award administration. The RTT staff relies on an "in-house"

Submissions and Award Tracking (SAT) system for proposal and award management. Proposal development and submissions are managed through the Cayuse® 424 software suite. There is no current means for integrating information stored in SAT or Cayuse® into the University's enterprise system. The creator of the SAT system is no longer employed by the university and there are indications that the SAT system has limitations in terms of its functionality and capacity. The lack of office standards in data entry for the SAT system has led to data inconsistencies that complicate reporting of historical trends and meaningful data analysis. Information on institutional compliance related to IRB, IACUC, etc., is recorded in the Cayuse® system at the time of the proposal but this information is not readily available to the Director of Compliance or the relevant compliance committees.

The institution uses informal means for evaluating technology needs to support the research mission. The University's chief information officer meets periodically with the VPR and Director of SPA to review technology support.(This is not current practice) Members of the research community appear to have limited involvement in testing or evaluating new technologies. For example, the complexities of approval routing involving multiple PIs, particularly when they cross departmental or unit lines, has led to significant challenges in the recent implementation of the travel and expenditures module that has increased the administrative workload on faculty and led to delays in the processing of travel reimbursements. Some of these issues may have been avoided had sponsored programs staff and departmental administrators been involved in the testing phase prior to roll out.

- **Recommendation: ASU should conduct a comprehensive assessment of its technology support for sponsored programs activities.** Particular attention should be paid to tech support related to proposal and award tracking, data integration, and data reporting. At a minimum, the assessment team should include representatives from IT, the Director and/or Associate Director of Research Development, the Director of Compliance, the Director of SPA, and one or more Departmental Research Administrators.

VI.B. STANDARD for Institutional Management of Research Administration Data.

Accurate and accessible data on sponsored programs activity and management is maintained and protected and the data covers areas of sponsored projects activity that relate to efficiency and research management metrics.. Trends in activity over time is tracked and appropriately reported. Policies and processes are in place for data security and data related to classified research. As appropriate to the institution, research administrative data also includes clinical trials, clinical research, and other externally sponsored activities.

The institution follows commonly accepted standards of data collection with respect to sponsored programs activities. On the pre-award side, this includes relevant information on proposal submissions, awards, sponsors, PIs, and federal reporting areas such as FFATA. The SPA office provides quarterly reports to deans and department chairs on grant expenditures and F&A distributions. Reporting of data and trend line analysis seems more problematic as discussed in Section VI.C, below.

There are fewer metrics collected with respect to the efficiency of the research administration operations, overall. For example, typical turnaround times from receipt of proposal to submission or turnaround times from receipt of award to award initiation are not recorded or assessed. Based on responses from the research community, the proposal receipt to submission is less of an issue and RTT staff are viewed as highly responsive. However, turnaround times from receipt of award notification to award setup seem exceptionally long, particularly when awards involve subrecipients and/or require review by the Office of Legal Counsel. Given the challenges in this area and the fact that many of the affected individuals are new in their positions, this would be an opportune time to begin recording baseline data to track further process improvements. Similar arguments can be made for tracking turnaround time for compliance review from IRB, IACUC, and IBC (see Section XII for a more detailed discussion).

- **Recommendation: RTT staff should consider adopting performance metrics used to assess the effectiveness of sponsored programs operations.** Particular attention should be given to areas such as contract review, issuance of subawards, time for completion of compliance reviews, and total processing times from notice of award to award implementation.

On the post-award side, metrics such as the number of awards assigned to each sponsored programs accountant, expenditures processed by each accountant and award setup time, particularly as these have changed as a result of staff reductions, would provide important evidence to support the need for additional staff resources. SPA provides excellent support for grant closeout. PIs receive notification at 180, 90 and 30 days prior to the end date of each award. Less support is provided to PIs on monthly expenditures. Some PIs have the advantage of support from departmental research administrators to assist with expenditure monitoring but others appear to be left on their own and the level of training/expertise among PIs is uneven, at best. It appears that users are given access to the Banner system without mandatory training.

The institution appears to take appropriate steps for the management of confidential data and overall data security.

VI.C. STANDARD for Research Administration Data Accessible to Constituents.

Institutional data can be manipulated to respond to internal and external constituent needs. Data and reports are presented in a manner that is easily understood by faculty. Appropriate to the size and volume, institutions make accessible real-time financial data.

Institutional use of data analytics to assess research productivity appears to be substantially limited. Suggestions for additional data metrics were briefly discussed in Section I.A. There are indications that data inconsistencies in the SAT system have made trend line analysis difficult. Performance metrics related to number of proposal submissions, numbers of awards and levels of faculty engagement, all broken down by department and unit, are not regularly reported to academic leadership. Information should also be provided in a manner that allows for trend-line analysis. The lack of information can make it difficult to assess unit-level performance and hampers efforts to adequately plan for anticipated resource needs such as faculty reassigned time. Financial data is available in real time to PIs and departmental staff, but it must be extracted from Banner reports that are not known for their user-friendly interfaces and reports are not always formatted in a manner that is easy to interpret.

On a positive note, the institution has recognized limitations on data analytics for many functional areas, including research. The University is currently considering implementation of the Argos reporting software that would greatly enhance the institution ability to extract and manage data. As Argos and Cayuse are developed by the same company, the importation of data from Cayuse into Argos should be a relatively simple matter and would greatly enhance the data reporting capabilities for all pre-award and award management functions. If an institutional decision is made to adopt Argos as the university's reporting tool, both the RTT and SPA offices need to be involved in its implementation

- **Recommendation: RTT and SPA staff should engage in a comprehensive effort to improve data reporting to the campus community. At a minimum, the units should produce an annual report on key performance metrics related to its research operations.** Consideration of the Argos reporting tool is a positive step in addressing the need for improved data analytics. The RTT and SPA staff should be included in plans for system implementation

VII. Institutional Affiliations and Relationships

VII.A. STANDARD for Research Affiliations with Other Organizations.

> The institution has clearly defined all relationships with hospitals or other organizations that are participating or collaborating in research activities. These relationships apply to research activities flowing in through the affiliate as well as flowing out to the affiliate. Defined relationships additionally includes research-related institutional services (such as oversight for regulatory compliance areas such as human or animal research) provided to other organizations.

The United States Department of Agriculture's (USDA) Agriculture Research Service (ARS) Delta Water Management Research Unit is housed within Arkansas State University's Arkansas Biosciences Institute (ABI). USDA ARS National Sedimentation Lab personnel are also housed in this facility. These personnel are funded through USDA. USDA enters into Specific Cooperative Agreements with Arkansas State University for work on which its faculty, research staff, and students who engage in collaboration with USDA ARS staff. These agreements provide funding for detailed work statements.

Arkansas State University affiliates can benefit greatly by the presence of and interactions with USDA personnel; this arrangement should allow for collaborative research opportunities which might otherwise be unavailable. The University is to be commended for having formal agreements in place for collaborations between USDA and its own staff and students.

VII.B. STANDARD for Research Affiliations with Non-Employed Individuals.

> The institution has clearly defined relationships with individuals who are engaged in conducting research, but who are not employees. Such individuals include visiting scholars, courtesy faculty, or other zero percent appointment individuals who are afforded space and responsibilities associated with research activities.

In its draft "Governing Principles and Procedures for Centers and Institutes," Arkansas State University defines "affiliates" as ". . . individuals who participate in ASU's education, research, or service activities, but are not employees or students" (http://www.astate.edu/dotAsset/d3ba1aaf-5e73-4124-b29d-9f86d019c72c.pdf, p. 1). Affiliates receive letter of appointment that include periods of service, position descriptions, and compensation terms, if any. Affiliates are responsible for understanding and complying with all University policies and procedures, including sponsored research policies and procedures. Although this document is accessed under the heading of approved governing principles and is clear and complete, it is currently in draft form, and appears to be awaiting review and approval of the Shared Governance Committee.

- **Recommendation: Arkansas State University should present the governing principles document for institutes and centers to the Shared Governance Committee as soon as possible and post it as a final and official document as soon as that Committee has approved it.** If the Shared Governance Committee has already approved the document, it should no longer appear on the Web site as a draft document.

In conjunction with the "University's Governing Principles for Externally Sponsored Programs" (which is also currently in draft form, although listed under the heading of approved guidance), which describes principal investigator eligibility, this document will ensure that relationships with affiliated individuals are described consistently in proposals and treated consistently once sponsored awards are in place.

VIII. Sponsored Program Operations: Funding and Proposal Services

VIII.A. STANDARD for Funding Resources.

> The institution provides faculty, staff, and students access to information on prospective sponsors (such as federal, state, local, private foundations). These constituents are provided tools and assistance as appropriate to the culture of the institution, the level of activity, and the relative importance of research in strategic goals.

From meetings with all of the groups represented in the site visit – central and departmental administrators and faculty members – it's clear that RTT staff members, as their responsibilities are now configured, have heavy workloads, making it difficult if not impossible for them to provide high quality information on funding opportunities.

- **Notable Practice: RTT staff members stated that they feel it is important to stay current on funding trends, and that they subscribe to listservs, blogs, and monitor agency Web sites for funding information.**

However, it also appears to be an RTT philosophy that faculty members are responsible to find appropriate funding opportunities. Several faculty members stated that RTT clearly delivers the message that identifying funding opportunities is not their responsibility and that faculty members should view this exercise as professional development for themselves; that it will help them to learn about funding trends.

As the institution is interested in increasing its research and sponsored programs portfolio, it is essential that faculty members have the highest level of support from the moment they have project ideas. Faculty members, and particularly new faculty members, cannot be left on their own, without direction, to identify funding

opportunities but instead must be given tools to assist them with this task, and education on how best to use those tools. As faculty build their funding portfolio and develop their networks, they will need less guidance and education about sponsors.

Currently, faculty members have access to the Foundation Center funding search mechanism through two logins to a centralized subscription. The password is not distributed, so in order to use the search engine, they must login from a centralized location within the RTT office suite. Several faculty members noted that they have access, through ITCC, to the SMARTS/Genius Profile function within InfoEd SPIN, and that they find it very valuable. RTT staff seemed unaware that faculty members still had access to this tool; it was mentioned neither in the background materials provided to the Review Team nor meetings with staff members.

- **Recommendation: Arkansas State University should make faculty members aware of the availability of the SMARTS/Genius Profile function within InfoEd SPIN, and offer workshops on using it.**

Without both awareness of the features of the tool and support for using it, faculty members may become frustrated in attempting to conduct their own funding searches. This is especially a problem with new faculty members, who may lose interest in applying for external funding if they encounter difficulties and insufficient support in searching for funding opportunities. With guidance from professional staff who understand the tools and the faculty members' interests, faculty members will be able to perform, at first with assistance and then on their own, searches that yield more valuable results. They will also be able to set up better alert profiles, reducing frustration at being confronted with a long list of opportunities that may or may not be appropriate. If RTT currently has insufficient staff to provide this service/these workshops, they might consider partnering with the ITCC Faculty Center to provide the educational opportunity.

Worse than failing to provide faculty members with information on funding opportunities is providing funding opportunities that are inappropriate. Faculty members will quickly become frustrated at reading through forwarded emails with information on funding for which they are either ineligible or in which they are uninterested. If faculty members perceive that administrative staff members are not tailoring funding information to their specific needs, they will begin ignoring all communications from those administrators.

- **Recommendation: RTT should meet regularly with faculty members, focusing on new faculty members as they begin their careers, to discuss scholarly/funding interests and to enter those interests into a database.** They will then be able to provide those faculty members with targeted funding opportunities, eliminating any faculty frustration at being presented with funding information that they cannot use.

- **Notable Practice: RTT staff members, when working with a faculty member on a proposal, access the program announcement or solicitation to which the faculty member is responding; analyze the match between the funding program and the project to be proposed; and look at what has been funded through that program in the past.** This is an important service that will ensure that faculty members do not waste their time in responding to an announcement that is inappropriate to their project, or that is a "bad match" for the project staff or the institution. Educating faculty in making these determinations for themselves will, however, save time and allow RTT staff members to focus on other aspects of proposal development, preparation, and submission, and on other important pre-award functions.

- **Recommendation: RTT should regularly host workshops on analyzing and interpreting sponsor funding announcements and on making determinations on "fit" and decision on what opportunities to pursue.** These workshops could be presented by a combination of RTT staff members, faculty members who have been successful at finding and applying for external funding, and sponsor representatives, as appropriate.

Providing funding information is not an insignificant task, in terms of either time or effort. Done correctly, it represents a large occupation of time. RTT staff members will want to be able to show that it is a service that is utilized by and helpful to faculty members.

- **Recommendation: RTT should track faculty members' use of its funding information services through a periodic survey or poll asking faculty members from where they originally received funding information for opportunities to which they respond. They should also survey faculty on their experience in working with the office staff.** In addition to justifying the need for these enhanced services, such a tracking system his will help staff members to focus their efforts on the areas in which they are most needed and used. The survey could be given on a regularly scheduled basis or each time RTT staff members work intensively on a proposal with a faculty member or group of faculty members.

VIII.B STANDARD for Proposal Assistance.

> Appropriate to the size and needs of the institution, assistance is extended to assist faculty and research personnel in responding to funding opportunities and preparing proposals.

RTT staff members are committed to being integrally involved in the proposal development process. The office's regular proposal development services include reviewing program announcements/solicitations; discussing the project goals with faculty to determine whether or not the project is appropriate to the identified funding opportunity; working with faculty members to develop project budgets; advising on all

documents necessary for the proposal; editing biosketches and current and pending support forms; writing, in collaboration with the faculty member/project director, budget justifications; and editing supplementary/appendix documents as time allows.

The most helpful proposal development services begin at the very earliest point in project conceptualization, with an analysis of the match between the project idea and funding opportunity.

- **Notable Practice: Reviewing program solicitations for "fit" with the project is a service RTT is regularly providing to faculty.** RTT members also review these documents in order to alert faculty members to special circumstances that may arise during project management, either from a programmatic or administrative standpoint.

Proposal development and preparation support continues with the drafting of the narrative and construction of the budget. RTT staff members work with faculty members in constructing budgets. Faculty members stated that this is a valuable service, but also noted problems with post-award administration revolving around budgets developed in collaboration with, or by, RTT staff. They added that budget assistance has varied over the years, possibly due to the high turnover rate within the office. The Reviewers understand that current post-award problems are likely a result of budget errors made by staff members who are no longer with the University. However, it is also clear that current staff members have varying levels of knowledge of post-award policies and procedures; understanding these issues is vital if the budget proposed is to be implemented smoothly at the post-award stage.

- **Recommendation: In order to ensure that all budgets submitted with proposal packages are not only compliant with sponsor guidelines, but also with institutional policies and procedures and college- and department-level practices, Sponsored Programs Accounting (SPA) staff should be involved in the review of proposal budgets prior to submission.** The Reviewers are sensitive to the fact that SPA staff members are already working at capacity, so suggest that their review of proposal budgets be instituted as a pilot to determine if the review is adding value to the proposal review and approval process. If there are fewer post-award difficulties in administering budgets after the pilot period, SPA should consider continuing the practice as a standard procedure.

At the pre-award stage, SPA staff members should work with RTT staff members on identifying budget items that might be unusual. This is an opportunity to determine how expenses will be paid once the award is made and ensuring that there is no delay when the faculty member/project director is ready to begin work and initiate spending.

- **Notable Practice: RTT staff members understand faculty members' varying needs and provide enhanced services as appropriate.** Staff members noted that, in exceptional circumstances, RTT staff will help with writing proposal narratives. This has

been a service offered primarily to faculty members whose first language is not English and who need help with the presentation and organization of the proposal. Providing such enhanced service is burdensome even for a well-staffed office; for an office with limited resources, it can become an overwhelming task.

- **Recommendation: RTT should direct faculty members who need assistance to an internal resource, such as the Writing Center, for assistance with writing proposals.** This will serve not only to relieve RTT staff members of the burden of intimately understanding the faculty members' projects and of providing timely assistance, but will also ensure that faculty members have the highest level of writing support from staff members specifically trained in providing that support.

- **Recommendation: Arkansas State University should consider making funds available to hire independent proposal writers for faculty members working on high dollar value proposals in areas identified as a priority for the institution.** RTT could maintain a list of vetted proposal writers who can be contacted to provide writing support, especially when timeframes are tight. A professional proposal writer will not relieve the faculty member of all responsibility for writing the proposal, but can provide very heavy editing services and, working closely with the faculty member, help to meet a deadline that would otherwise be difficult if not impossible to meet.

RTT has, in the past, provided enhanced support for the development of complex and multi-disciplinary/multi-site collaborative proposals, particularly by setting up conferences of collaborators. This service is no longer being offered, as the office is consumed with more time-sensitive, everyday tasks such as proposal submission.

- **Recommendation: As RTT becomes more involved in identifying funding opportunities, staff members should pay special attention to opportunities for large, complex, multi-disciplinary/multi-site project funding and proactively seek groups to work on proposals in response to these opportunities.** These are awards that not only help to quickly build the research portfolio, but also allow faculty members, and the administration, to carry out work in areas of priority for the institution.

RTT research development staff should resume the practice of setting up meetings of collaborators and, as appropriate, from their knowledge of faculty interests, suggest collaborators. After carefully reading and understanding the solicitation or announcement, RTT staff members can provide the valuable service of preparing talking points to be addressed in a meeting of collaborators and facilitating the proposal development process as resources allow. Any funds allocated for professional proposal writing assistance could be made available for these projects first, ensuring that faculty members involved in the projects have the extra level of support they need.

IX. Sponsored Program Operations: Proposal Review and Submission

IX.A. STANDARD for Proposal Review.

> The institution has a consistent approach for reviewing and processing proposals that is in compliance with institutional and sponsor guidelines and requirements. The roles and responsibilities associated with the proposal review and submission activities are clear. Appropriate management systems are in place and the proposal review process interfaces smoothly with regulatory process/systems and the systems/processes for accepting and managing any subsequent awards.

In its Governing Principles, Arkansas State University publishes a detailed statement of how gifts and grants are defined and differentiated. The statement is very clear and should serve as a starting point for discussions with sponsored programs and advancement staff and as a guide to determining which office works on a given funding opportunity or "ask" to a potential donor or funder. In practice, however, the definition/differentiation is not being consistently taken into consideration. Advancement staff and RTT staff seem to decide how a given proposal will be handled on a case-by-case basis, based on their collective interpretation of the potential funder's literature, guidelines, and application materials. This can lead to great confusion over roles and responsibilities, and could potentially lead to a great deal of frustration among faculty members seeking funding.

Advancement and RTT staff members have noted that foundation proposals are not submitted through advancement unless they are requesting at least $25,000. RTT serves in a faculty development role, so submits proposals for all faculty scholarly work, regardless of the amount of the request. This could cause faculty members to feel they must "shop" offices to get a proposal submitted, and may blur the line between gift and grant.

- **Recommendation: Arkansas State University should develop and make easily accessible a formal and detailed "roles and responsibilities" document that clearly describes the office that is responsible for each function of the sponsored program lifecycle, including the initial determination as to whether the award will be made as a gift (submitted and administered through advancement) or a grant (submitted and administered as a sponsored program).** Such a document will be invaluable throughout the life cycle of the sponsored award, eliminating confusion as to who will carry out what task, thus eliminating both duplication of effort and tasks "falling through the cracks."

Faculty members have expressed frustration at preparing a proposal that RTT staff may not submit on their behalves, because the prospective funder is being, or may be,

asked for a large donation. It is important not to go to potential major donors with multiple small requests, but faculty members must be informed of any restrictions so that they do not waste their time and efforts preparing a proposal that will never be submitted.

- **Recommendation: Advancement staff should compile a list of all foundations that are not to be approached and make it available and easily accessible to the campus community.** This will save faculty and administrative time and reduce faculty frustration at having incomplete information and being caught by surprise with restrictions.

Faculty members also expressed frustration over lack of clear communication about internal deadlines for proposal submission. It was noted that RTT makes very clear and well-defined deadlines available for student proposal submissions but does not do the same with overall internal deadlines.

- **Notable Practice: In its Proposed Research Governing Principles, Arkansas State University includes a chart clearly outlining internal deadlines for submission of proposal requests and documents, including deadlines for matching fund requests and for electronic and paper submissions.** Faculty members, however, have expressed a high level of frustration at confusion over internal deadlines. If these proposed principles have been approved, they are being neither communicated widely nor enforced consistently.

- **Recommendation: Arkansas State University should formally institute and widely communicate internal deadlines for proposal submission that are consistently enforced.** RTT staff members are to be commended for their service-oriented attitude of wanting to do everything they can to meet very tight deadlines, but their workload could be made more predictable and thus less burdensome if they were to have proposal documents in a timely fashion. This would also ensure full review, minimizing instances in which issues are "missed" and proposals submitted with mistakes or obligations that the university is unable to meet. Deadlines should be enforced with appropriate flexibility for extenuating circumstances, but must be enforced.

- **Notable Practice: RTT staff members review proposals for compliance with sponsor/program/solicitation guidelines, including page limitations, required documents, prohibited documents, and page and document formatting.** This will help to ensure that proposals, once submitted to satisfy the sponsor's deadline, are not returned for noncompliance with guidelines. Staff members did not, however, state that they have procedures in place for review of proposals for compliance approvals, including approvals for the use of human and animal subjects and compliance with conflict of interest regulations. Struggling with tight deadlines, as do all research administrators, could lead RTT staff members to, in the interest of getting the proposal submitted on time and accepted for review, sacrifice full institutional review.

- **Recommendation: RTT staff members should develop a checklist for proposal review that includes items not only for all elements of the proposal, but also for all required approvals.** This should be used in reviewing each proposal before that proposal is submitted to the sponsor. RTT staff members are currently concentrating their efforts more on research development, including proposal development, which could potentially be to the detriment of the vital pre-award function of ensuring proposal compliance with sponsor and institutional requirements.

- **Notable Practice: RTT requires that subrecipients submit a letter of collaboration, signed by an authorized organizational representative, along with a statement of work, budget, and budget justification prior to including those subrecipients in outgoing proposals.** This avoids situations in which subrecipients' resources are committed without their administrations' knowledge and allows pre-award staff to review budgets for compliance with cost principles and sponsor-specific guidelines.

RTT staff members did not note any special procedures associated with the submission of responses to requests for proposals (RFPs), requests for bids (RFBs), requests for quotations (RFQs), and broad agency announcements (BAAs). This type of submission requires that applicants agree to award terms and conditions at the time of proposal submission; by submitting a proposal under one of these mechanisms, the institution is certifying that it can and will comply with all terms and conditions of the award as detailed in the solicitation. This in fact may not be the case.

- **Recommendation: RTT staff members should be trained in identifying RFPs, RFBs, RFQs, and BAAs at the proposal stage and work with legal counsel to review the terms and conditions that would govern an award.**

Once RTT staff members are trained in identifying these types of announcements/ solicitations, they should develop and follow a set procedure in responding to them. Many times, institutions are unable or unwilling to accept all of the terms and conditions outlined in the announcement/solicitation, in which case they must decide either not to submit the proposal or to submit it with an exception letter. Drafting an exception letter is similar to negotiating a contract and requires a high level of knowledge of areas of particular risk and of legal issues. RTT should follow the same procedure of working with counsel as it does when negotiating award agreements and subagreements, while pursuing training in recognizing and addressing these issues.

- **Notable Practice: RTT staff members assist in budget construction, which helps ensure that all costs are allowable, allocable, and reasonable; identify cost sharing; and ensure that institutionally negotiated rates (fringe benefits and facilities and administrative costs) are correctly applied.** However, faculty members have noted that, particularly with budgets prepared before the current staffing pattern in RTT was established, there are instances in which mistakes that greatly impact the administration of the award were made. This is due, in part if not in whole, to the high

rate of turnover in that office. As previously recommended, instituting a system through which post-award staff members review budgets prior to submission will assist with finding potential "sticking points" at the early stages. This practice will also assist with ensuring that costs are budgeted according to Federal cost principles and using proper university rates.

- **Notable Practice: Arkansas State University uses an electronic proposal review and submission system, Cayuse 424, to gather internal approvals and submit Federal proposals.** This ensures that all university officials required to approve proposals (principal investigator, department chairperson, dean, central administrators) have access to proposal information and sign off on proposals. The university has, in its Proposed Research Governing Principles, written guidelines on what administrative officials should review in approving proposals (cost share, effort, commitment of resources). Principal investigator/project director electronic approval certifies agreement to take responsibility for the project and its administration and compliance with all sponsor and institutional requirements. The principal investigator's/project director's responsibilities are also outlined in the Proposed Research Governing Principles.

Currently, only the Associate Vice Provost for Research and Graduate Studies and the Director of Research Development have signature authority on proposals and access to submit proposals electronically. It's commendable that there is "backup" in that more than one institutional representative is empowered to submit proposals, but could cause a problem when a proposal with a tight deadline must be submitted and both of these individuals are unavailable.

- **Recommendation: The Authorized Official should give the Associate Director of Research Development authority and access to submit proposals electronically once they are approved.** With the additional training recommended, this individual will have the skills and knowledge required to make a decision as to whether a proposal is ready for submission and to bind the institution to deliver what is offered in the proposal.

- **Notable Practice: Arkansas State University has a system of internal review in place for instances in which sponsors limit the number of proposals that an institution may submit to a program (limited submission programs).** Although, as staff members noted, the university does not submit proposal to a large number of limited submission programs in a year, this is an important practice. Such internal coordination and review will ensure that the institution's proposals are not returned without review for failure to comply with limits and that the proposals which are submitted under limited submission programs are of high quality.

Recovery of full allowable facilities and administrative costs is essential for all institutions, and especially for institutions seeking to build their research infrastructures, as is Arkansas State University.

- **Notable Practice: Arkansas State University has in place published guidance on including full F&A in proposal budgets, when allowable.** Detailed and published guidance on procedures to be followed to request approval for budgeting F&A at a reduced level are also in place. This will serve to avoid confusion and frustration among faculty and to ensure that the institution's F&A rate is properly applied in all instances.

IX.B. STANDARD for Proposal Submission.

> The institution has adequate understanding of submission requirements for electronic and non-electronic proposal submissions.

Arkansas State University is using an electronic review and submission system, Cayuse 424, for the submission of proposals to Federal sponsors. This helps to ensure that proposals are formatted and submitted correctly to meet Federal sponsor requirements. For non-Federal submissions, staff members use the sponsor's electronic submission system or submit paper or emailed copies, as required. Neither faculty members nor administrators noted any deficiencies in staff members' ability to properly use the appropriate system/procedure to submit timely and complete proposals.

RTT staff members noted that they maintain institutional registrations and profiles for all research administration systems they use. As there has recently been a great deal of turnover in this office, this could lead to a situation in which an individual does not have the information needed to renew or update the institution's registration to a specific system. Registrations must be up-to-date in order to efficiently submit proposals to and transact other business with Federal agencies. ASU may wish to consider giving central information technology staff access to register for and maintain registration of Federal award management and proposal submission systems as backup administrators of those systems. This will help ensure that registrations are kept up to date regardless of staffing in the research administration office, and that there is no lapse in the institution's access to the systems.

RTT staff members expressed a high level of comfort in using electronic systems for proposal submission, including Cayuse 424 for Federal proposals and sponsors electronic submission systems for other proposals.

- **Recommendation: In order to stay current on changes in and updates to proposal submission systems, RTT staff members should attend training sessions on such systems as part of the annual training plans previously recommended.** Training might be provided by the vendor, by a university representative, or at a professional organization meeting.

X. Sponsored Program Operations: Award Acceptance and Initiation

X.A. STANDARD for Award Review and Negotiation.

> The institution has a consistent process to review terms and conditions of grant, contract, and agreement awards. Incoming subawards are reviewed for the terms of the subaward and the flow-through terms of the prime award.
>
> The institution evaluates all awards for sponsor restrictions on such items as the use of funds, appropriate project personnel, publication rights, or intellectual property to assure compliance with institutional policies that govern the research activities of the campus.

Because of a previous high turnover rate in RTT, staff members do not have a long history of negotiating terms and conditions of agreements. Only the Director of Research Development is empowered to handle contracts at all. As previously discussed in Section I.B., RTT currently estimates that approximately 80% of all incoming award documents/transactions are sent to legal counsel for full review. Each year, RTT is involved in negotiating a small number of non-financial agreements such as material transfer, teaming, and nondisclosure agreements; these too are forward to legal counsel for review. Counsel also drafts all subagreements, including for subawards under federal grants with standard terms and conditions. As there is one attorney assigned to the entire institution, legal review can take up to several months. Counsel's time is occupied with many issues in addition to sponsored agreements, so these agreements are reviewed as time allows. This has led to delays in project initiation and in issuing subawards to collaborators, which can at a minimum cause the institution to appear incompetent and, in the worst case, jeopardize the success of the funded project. Faculty members have noted that they are not updated on the status of pending agreements and must make an effort to follow up on them in order to get the information they need to plan their work.

- **Recommendation: RTT staff members should develop a system for tracking agreements as they are sent for legal review and reminding counsel of timeframes in which projects must be initiated.** Because one attorney serves the entire university and has competing priorities, it is important that RTT staff members ask that agreements be reviewed in a specified time frame and that they follow up on those agreements once they are sent. Legal counsel herself has noted that she prioritizes work when she receives requests for action or status reports. While it is clear there are multiple priorities for Legal to define, the time-sensitive aspect of research contracts becomes crucial for faculty success. RTT should ensure that counsel understands the time-sensitive nature of the agreements she is being asked to review by initially offering a timeframe for their review and periodically following up on their status. Establishing such

a tracking system would also provide RTT with the information it needs to make faculty members aware, on a periodic basis, of the status of their pending agreements.

Because only one individual in RTT works with contracts at all, those awards often must wait until that individual has time to devote to them before they are even sent to legal counsel for initial review. Awards are time sensitive and should be of highest priority. To avoid delays in work, in payments, and in finalizing arrangements with any collaborators, they should be set up as soon after they are received as is feasible.

- **Recommendation: As previously discussed in Section I.C., Arkansas State University should consider devoting one full time equivalent position to pre-award functions, including award review, negotiation, and initiation.** Currently, all RTT staff members work on all aspects of research development and pre-award research administration, from training/educating faculty to proposal development and submission to research awareness and advocacy. Many of these activities require extensive time out of the office, presenting workshops, hosting events, or meeting with faculty members. As vital as these activities are to the research enterprise, so too are the pre-award tasks of receiving, reviewing, negotiating, and accepting agreements and initiating awards. Those duties cannot wait until existing staff feel they have time to attend to them, working around other responsibilities. By the time RTT staff does work on these duties, there may be a backlog of activity being forward to legal counsel at the same time, further delaying initiation of project activities. A position dedicated to carrying out these responsibilities will help ensure that agreements are shared with legal counsel and negotiated in a timely fashion, and help prevent a backlog.

- **Notable Practice: As previously noted, RTT staff members are committed to attending training to keep them current in the field, and the administration is supportive of training, providing resources for this purpose as the budget allows.** Overall training for RTT staff members is very important; however, concentrated training in contract review and negotiations leading to a comprehensive understanding of the areas of particular risk for universities will increase the administration's level of comfort with delegating contract review and negotiation responsibilities to RTT. The Director of Research Development currently uses a chart that was made available as part of an NCURA workshop. The chart lists troublesome clauses and areas of special attention in contracts but cannot take the place of formalized training on contract review and negotiation.

- **Recommendation: Legal counsel should work with RTT staff members on a training plan that designed to give staff members the skills they need to review and negotiate lower risk agreements on their own.** A higher comfort level with staff members' training and skills would be an important first step toward empowering those staff members to carry out more contract review and negotiation responsibilities on their own. Once staff members are more comfortable with their knowledge and skills, they

can progress to using pre-approved templates for certain transactions, and then to negotiating simpler agreements on their own.

- **Recommendation: Arkansas State University should carefully consider its level of risk tolerance in relation to the level of risk that agreements processed through RTT, in support of sponsored programs, pose. If a higher level of risk can be tolerated, the administration should consider allowing RTT more latitude in negotiating agreements and using templates that RTT staff are empowered to finalize.**

If the University determines that it is willing to accept a higher level of risk, legal counsel could provide RTT with detailed written guidance to use in negotiating less complex agreements on their own. A document outlining optimal language for specific clauses that are often troublesome or negotiated out of agreements (such as indemnification, ownership of intellectual property, choice of law, and insurance), and providing acceptable substitute language and guidance on when to contact counsel would be very useful in providing structure for RTT staff and empowering them to make lower-risk decisions on their own. Legal counsel and RTT staff should work collaboratively on developing this guidance, turning that develop itself into a learning experience for RTT members.

Currently, Counsel is drafting all subaward agreements, although a template with the University's optimal language has been developed and approved. RTT staff members generally do not revise or tailor the template in any way, even to enter award beginning and end dates, amounts, and reporting requirements. Empowering RTT to tailor the template to the specifics of each award and to negotiate non-substantive changes will facilitate and shorten the award review, acceptance, and initiation process.

The Federal Demonstration Partnership (FDP) makes available standard templates for use in issuing subawards under Federal awards. These may be used by any institution, regardless of FDP membership status. The templates were developed, approved, and tested in collaboration with Federal agency representatives. Many universities routinely use these templates in issuing subawards. Because so many subrecipients are familiar with the templates, negotiations are minimized, decreasing the time required to finalize subawards.

RTT staff members did not mention a process for comparing award budgets to proposals budgets when awards are received and negotiated. This is an important step in award negotiation. If the amount of the award is reduced from the amount of the request, a revised budget may be required, or the investigator may need to scale back the scope of work to fit the available funds.

- **Recommendation: RTT should develop written procedures for reviewing award documents against proposal documents, and for negotiating any appropriate**

changes to budgets and scopes of work. This will ensure that investigators have sufficient funding to carry out their work. Without such a check in place, the institution could be forced to cost share a portion of the project.

Both RTT and SPA staff members expressed a high level of comfort in using the systems required for award management, such as National Science Foundation FastLane and the eRA Commons. Such proficiency with electronic systems is essential to the smooth administration of sponsored programs.

- **Recommendation: In order to stay current on changes in and updates to electronic award administration systems, RTT and SPA staff members should include sessions on such systems in the annual training plans previously recommended.** It is commendable that staff members are comfortable in their knowledge of and skills in using these systems. With continuing education in their use, they will not only be able make the most effective and efficient use of those systems, but also to help each other and new staff members in using them.

Central information technology staff members provide robust support for the university's technology systems, and training is regularly available to all staff members. As previously recommended, training in the use of the university's financial system should be a requirement for access to that system.

X.B. STANDARD for Subawards.

Outgoing subawards are reviewed and negotiated to reflect sponsor flow through requirements and institutional policy.

Faculty members noted that subaward issuance and administration is an area for improvement at the university. Staff members involved in subaward negotiation, issuance, and administration have developed processes to comply with sponsor requirements, which is to be commended. The University must now take a further step in more efficiently and effectively negotiating, finalizing, and administering subawards.

- **Notable Practice: RTT staff members noted that they use the criteria in Office of Management and Budget (OMB) Circular A-133 in determining whether to treat an entity budgeted on a proposal as a subrecipient or a contractor (or vendor, in A-133 terminology).** When the Uniform Guidance goes into effect, institutions will be required to document their decision to treat an entity as a subrecipient as opposed to a contractor (in Uniform Guidance terminology).

- **Recommendation: RTT, in collaboration with SPA, should develop a form, based on the Uniform Guidance criteria for classifying entities as subrecipients, for documenting the decision to treat an entity as a subrecipient.**

Such a form should include a checklist of the criteria for classifying entities as subrecipients, the criteria for classifying entities as contractors, a brief statement of the collaborator's/entities work, and should bear the signature of the principal investigator/project director. RTT staff can use the information provided in either requesting additional information or making a determination as to how to treat the entity. Use of this form will not only satisfy the documentation requirements of the Uniform Guidance, but will also help principal investigators/project directors and research administration staff discuss fine distinctions and catch potential misclassifications.

- **Notable Practice: Arkansas State University makes a risk assessment prior to issuing subaward agreements, so that higher risk subrecipients may be more closely monitored.** However, the process for assessing risk is too informal and open to staff members' interpretation. Currently, RTT and SPA staff members meet weekly; at these meetings, they discuss subrecipient risk as the need arises. They collectively agree on a risk rating. With high turnover rates in the offices responsible for research administration, this could lead to inconsistency and mistakes in classifying risk.

- **Recommendation: Arkansas State University should develop a formal checklist, made easily accessible to the University community, for determining subrecipient risk, and apply it consistently to all subrecipients.** Risk ratings should then be documented and shared among the offices responsible for subrecipient monitoring. This will eliminate the need to re-assess risk of a previously rated subrecipient when circumstances do not change.

As previously noted, the process of drafting, negotiating, and executing subaward documents can be protracted because of the heavy involvement of legal counsel and the lack of an RTT staff member dedicated to pre-award, as opposed to research development, functions. Using templates, as recommended, will facilitate the subaward process and help ensure that collaborators' work begins on schedule.

RTT staff members noted that they have insufficient time to periodically remind subrecipients to review and return subaward documents once they are issued. Because there is no formal follow up, subawards can sit in subrecipients' administrative offices for months before being returned. Until the documents are fully executed, collaborators' work may not begin, jeopardizing not only the project but principal investigator's/project director's relationship with his or her colleague in the subrecipient institution.

- **Recommendation: RTT staff members should track the status of subaward documents as subawards are requested, drafted, and sent to subrecipients for review and execution.** There should be regular follow up on subaward documents with the subrecipients, to ensure that they are executed in a timely fashion.

As previously noted, RTT staff members require letters of collaboration with statements of work, budget, and budget justifications from entities included as subrecipients in their proposals. There is no evidence, however, that they require documentation of compliance approvals (such as IRB and IACUC approvals) before issuing subawards.

- **Recommendation: Arkansas State University should develop a process for confirming subrecipients' compliance approvals prior to issuing subawards.** This could be through use of a standardized message to subrecipients requesting compliance approval documents in conjunction with a database tracking their submission. The process, once developed, must be consistently followed. The university is responsible for its subrecipients and must ensure compliance with these regulations; issuing subawards only after approvals have been confirmed is will ensure proper approvals are in place.

- **Notable Practice: SPA staff members are responsible for FFATA reporting and have processes in place to ensure that reporting is done accurately and in a timely fashion.** RTT staff members send out a subrecipient questionnaire at the time subawards are negotiated; this questionnaire collects the information necessary for FFATA reporting.

- **Recommendation: SPA staff members should develop formal written procedures for FFATA reporting and make them available to the university community.** This will not only assist in making current and prospective principal investigators/projects directors and administrative staff aware of the requirements and the processes in place to meet them, but will also ensure that new staff members are able to submit accurate FFATA reports.

X.C. STANDARD for Award Acceptance.

> The institution has a process in place that allows the formal acceptance of a sponsored award by designated individuals or offices. The award acceptance process interfaces smoothly with processes for proposal submission and award management.

Arkansas State University uses Cayuse 424 for proposal review and approval, and, for Federal proposals, submission. However, this system does not have a post-award function. RTT uses Evernote to document and track awards as they are finalized and accepted. Awards are then transferred to SPA in paper format. When paper files are transferred to SPA, staff members in that office scan the award documents into WebXtender, a database they use for post-award purposes. Because RTT staff forward documents to SPA staff and have no written guidelines for what's to be included in a file that's transferred to SPA, what's eventually available electronically may or may not represent the entire file.

It is essential that post-award staff have full information on proposals, including notes on proposal review and award negotiation, available to them in administering those awards. Both pre- and post-award staff must also have access to the system used to track compliance with human subjects, animal subjects, export control, and conflict of interest regulations. Decisions made at the post-award stage are often dependent upon what has happened at the pre-award stage; without full information available to all administrators, making sound decisions and complying with all institutional and sponsor requirements becomes difficult.

- **Recommendation: Arkansas State University should explore ways in which pre- and post-award and compliance systems can work seamlessly so that it is not necessary for multiple individuals in multiple offices to enter the same data multiple times.** Besides causing an unnecessary duplication of efforts, the current processes leave too much room for human error. Having pre- and post-award systems that are integrated will not only avoid duplication of effort and aid in accurate reporting, but will also help ensure that complete information is available to all who need it. Under the current system, post-award staff members do not have proposal documents. It is vital that all involved in the administration of sponsored programs have complete records, including full proposal documents. Many, if not most, decisions made at the post-award stage must include a consideration of what was offered and approved in the proposal.

It is vital that pre-award staff perform a detailed final review of award terms and conditions before accepting agreements/having them executed on behalf of the institution. The university has no specific written guidelines or procedures to be followed in this final review.

- **Recommendation: To ensure that all sponsor terms and conditions can be met, the detailed "roles and responsibilities" document previously should include the steps to be taken in final review of award documents.**

To ensure that all compliance requirements are met, especially as they relate to the use of human and animal subjects in research and conflict of interest, pre-award administration staff generally have access to compliance systems and/or to information on approvals. RTT staff members did not note that they routinely access such information before forwarding final award documents to SPP for award activation.

- **Recommendation: Arkansas State University should develop written procedures for confirming that any applicable compliance approvals are in place prior to activating accounts/allowing spending on awards.** Holding awards until all approvals are in place will ensure that no human or animal subject research is conducted without proper oversight and that all required financial conflict of interest disclosures have been submitted prior to expenditure of award funds.

X.D. STANDARD for Award Activation and Notification.

> The institution has a defined process to place a sponsored award in the accounting system and to make funds available to the principal investigator for expenditures. The institutional notification process for award activation is timely and clearly conveyed to appropriate positions, such as investigator and unit-level staff.

As previously noted, Arkansas State University uses an electronic proposal review and submission system, Cayuse 424, to gather internal approvals and submit Federal proposals. However, Cayuse 424 has no post-award tracking or reporting function. RTT and SPA staff members noted that there are no standardized systems or processes for moving awards from pre- to post-award administration. There is no written procedure for retrieving and acting on awards that are received electronically. Both faculty members and research administration staff members noted that there has been at least one instance in which an investigator's work has been delayed because an electronic award was to a mailbox that was not regularly monitored.

- **Recommendation: RTT staff members should establish a central office mailbox to which electronic awards are directed.** Responsibility for regularly monitoring this mailbox should rest with one staff member (with appropriate backup) so there is no confusion as to whether or not electronic awards have been retrieved.

Nor is there a system or procedure in place for tracking awards from time of receipt to time of activation. As previously noted, proposals and awards are tracked separately in an in-house database and awards are transferred to SPA in paper format. SPA staff members thoroughly review awards, scan documents into WebXtender, then enter award information into Banner, the university's financial system. Once the award information is entered, the SPA accountant lets RTT staff members know that an award meeting can be scheduled. This process is cumbersome, time consuming, and duplicative. It is ripe for delays in award activation and project initiation.

- **Recommendation: Arkansas State University should map processes, from award receipt to activation, and institute a system for tracking awards from the time of receipt to the time of activation.** Only by doing this can the administration determine what steps are involved, what steps are duplicative, what steps represent the greatest occupation of time and/or the biggest delays, and what steps are missing. Administration needs this information to guide it in building an infrastructure supportive of sponsored projects.

- **Notable Practice: When a large award or an award for a new principal investigator/project director is received and set up in the university's accounting system, RTT staff members schedule an award meeting for the principal investigator/project director and RTT and SPA staff members to discuss award**

administration processes. As appropriate, the Director of Research Compliance is invited to this meeting. This practice ensures that these new investigators, or investigators carrying out large projects, are aware of standard and special award terms and conditions and of their responsibilities in complying with them. Compliance responsibilities are not, however, restricted to large awards or new investigators.

- **Recommendation: RTT should develop written standard operating procedures or an "award manual" that can be provided to all investigators at the time of award activation.** This should include detailed information on specific award requirements (including reporting obligations and any spending restrictions) and contact information for questions that may arise throughout the conduct of the funded project. This will reinforce the message conveyed at the award meeting, in the case of large awards and/or new investigators, and will ensure that current investigators and those with small awards have the information they need to meet their responsibilities. SPA staff members mentioned a "PI Packet" that they give investigators to help in the administration of their awards. This could serve as a starting point for the operating procedures/manual, expanded upon to cover all aspects of award administration.

- **Notable Practice: Arkansas State University has a system in place for establishing pre-award accounts so that project initiation is not unnecessarily delayed.** Research administration staff and faculty members alike noted that this system is working well, that pre-award accounts are established quickly, and that procedures for establishing those accounts are not unduly burdensome. Before pre-award accounts are established, departments commit to covering expenditures in cases in which awards are not forthcoming. This is an important way of mitigating risk while allowing projects to proceed on schedule.

XI. Sponsored Program Operations: Award Management

XI.A. STANDARD for Fiscal Management.

The institution's control environment provides reasonable assurance regarding the effectiveness and efficiency of operations; reliability of financial reporting, and compliance with applicable laws and regulations. The institution maintains internal controls through processes, systems, and tools to ensure compliance with institutional and sponsor guidelines and requirements. Fiscal data is readily available through published reports, queries, or integrated systems for transaction processing, review and tracking of activities and reporting.

Solid and consistent post-award support is as important to efforts to build an institution's research/sponsored programs infrastructure as is strong pre-award support. Faculty members who participate in grantsmanship activities, either because

they have been encouraged to do so or because they need funding in order to carry out their scholarly agendas, will quickly become frustrated if they are met with obstacles at the post-award stage.

One of the most important post-award functions of both central and department level research administration staff is providing advice on expenditures, and carefully scrutinizing transactions brought before them for approval. SPA staff members expressed a high level understanding Federal cost principles and of comfort with making decisions as to allowability, allocability, and reasonableness. Pre-award staff, however, did not express as high a comfort level with the cost principles and often rely on post-award staff's guidance when faced with such a decision. This could cause mistakes in proposal budgeting which in turn will lead to problems in award administration. It is important that all research administrators, pre- and post-award, central and departmental, have a sound knowledge of the cost principles and a high level of comfort in determining which costs should and should not be charged to a sponsored program.

- **<u>Recommendation</u>: Arkansas State University should develop training for determining allowability of costs and require all staff members involved in research administration, at the central and department level, to take this training.** The university currently has brief written guidelines for determining allowable costs; however, since the decision as to whether or not to charge an expenditure to a sponsored agreement is often complex, they should be expanded upon and augmented with training. Written guidance explicitly discusses unallowable costs but should be expanded to discuss allocability, including the direct charging of administrative and infrastructure costs, and reasonableness. This training and detailed written guidance will empower all involved in the administration of awards, and especially department level research administrators, to make sound decisions regarding expenditures and ensure that improper charges are not made against sponsored accounts. Making detailed guidelines available to department level research administrators will also eliminate the need for central post-award administrators to be as involved in day-to-day transactions, easing their workloads and allowing them to focus on other areas of responsibility.

Many faculty members expressed an extremely high frustration level at not being able to easily access user-friendly information on their sponsored program accounts once they'd been set up. Faculty members are able to access this information themselves, but do not have time to do so regularly and should not be expected to bear that burden themselves. Instead, they should have the administrative support they need to allow them to focus their attention on the conduct of their projects. Department level research administrators assist faculty members in accessing financial information and monitoring budgets, but they too need information that is easy to understand and use.

- **Recommendation: Arkansas State University should provide expanded and enhanced training for department level staff members who assist principal investigators/project directors in monitoring their award budgets.** As previously recommended, Arkansas State University should require all staff members who will use the financial system to complete at least basic training in the use of the system prior to being granted access to it Training should be designed so that these professionals are able to easily access financial data and to manipulate it to provide investigators with the information they need to make decisions and carry out their work efficiently. With training in the use of university financial systems and financial software, such as Excel, department level staff will be able to project spending and provide investigators with "burn rates."

Access to data generated at the proposal and award acceptance stage is important at the post-award stage, to ensure proper use of funds and compliance with all requirements. Pre- and post-award systems are currently completely separate, and much data is entered multiple times into multiple systems. As previously recommended, Arkansas State University should explore ways in which these systems can work together.

- **Notable Practice: SPA has developed detailed guidance on financial management of sponsored awards, including effort reporting, subrecipient monitoring, and effort reporting.** Much of this information is reinforced in SPA's training sessions.

- **Notable Practice: SPA has developed and has made available on its Web site procedural guidance on major financial management aspects of awards.** The SPA Web site currently has links for information on the university's:

  - Administrative Costs Procedure
  - Cost Sharing Procedure
  - Expense Transfer Procedure
  - Effort Certification Procedure
  - Fund Closeout Procedure
  - Participant Support Costs Procedure
  - Residual Balance Procedure
  - Subrecipient Monitoring Procedure
  - Student Support Payment Procedure
  - Revenue Recognition Procedure

This is a robust list of procedural information that should provide staff, at the central and department level, with the information they need to responsibly administer awards. However, the links to the information do not consistently work.

- **Recommendation: SPA should ensure that all links on its Web site are operational so that information administrators need to make day-to-day decisions is readily**

available. The information available at the links should be regularly reviewed and updated in keeping with any changes in sponsor policy and/or institutional practice.

- **Notable Practice: Arkansas State University has detailed written procedures for effort reporting, including procedures for reminding certifiers to complete their effort reports and for escalating issues of non-compliance.** Staff members noted that the university has a 100% "on time rate" for effort reporting, which is to be commended.

XI.B. STANDARD for Administrative Management.

> The institution has established management systems for the non-financial administration of awards. The institution has established processes to monitor and report program performance.

In order to responsibly administer awards, all research administration staff, at both the central and department level, must have available to them detailed guidance on all aspects of award administration.

- **Notable Practice: Both RTT and SPA provided links to extensive and valuable guidance on many aspects of the award life cycle, from principal investigator eligibility to award closeout.** This includes information on the Arkansas State University's System policy on intellectual property. Some aspects of award administration, however, were not covered in this guidance.

- **Recommendation: Arkansas State University should develop and make easily accessible/readily available procedural guidance on all aspects of award administration, including non-financial award administration.** Aspects of award administration not covered in the guidance provided or available on the university's Web site include progress reporting, record retention, property management, subrecipient monitoring, and data retention. This guidance should be available in one location, even if currently housed on other units' Web sites, so that investigators and administrators can access it when they need it.

Universities' subrecipient monitoring procedures and processes have been and will continue to be an area for intense scrutiny, and therefore of high risk. RTT has procedures in place for determining that an entity should be treated as a subrecipient; SPA has procedures in place for FFATA reporting; and RTT and SPA work together to assign risk ratings to subrecipients. The university also needs to focus its attention on subrecipient monitoring, including putting into place procedures for invoice review and ongoing programmatic monitoring.

- **Recommendation: Arkansas State University should develop a system to document its monitoring of subrecipient expenditures and progress on meeting project goals.** Documentation of monitoring could be through a form to accompany

each invoice submitted for payment. Such a form should include a statement of progress made on project goals and a statement that the subrecipient's invoice has been reviewed for inclusion of all required elements and for alignment with the project budget. The principal investigator's/project director's signature should be required to indicate that work has been completed satisfactorily to date and that the charges are reasonable for the work done. An administrative representative's signature should be required to indicate administrative and budgetary compliance. Having such a form accompany each invoice will document the institution's due diligence in monitoring its subrecipients.

Neither RTT nor SPA staff noted any involvement in meeting interim reporting or annual application requirements. Project plans and budgetary needs, as well as principal investigators'/project directors' circumstances can significantly from the time of initial proposal submission to the time when the first interim report or annual application is due. Administrators need to be aware of and, as appropriate, make budgetary changes and/or make sponsors aware of these changes.

- **Recommendation: RTT should be involved in the review and submission of interim reports/annual applications, as they are in the submission of initial proposals.** Reviewing such documents prior to submission will not only allow RTT staff members to work with investigators on updating budgets and requesting any prior approvals for necessary changes, but will also allow them to ensure all required compliance approvals remain in place.

- **Recommendation: For awards that do not require interim reporting or annual applications, RTT should develop a system for ensuring that all required compliance approvals remain in place/have been updated as appropriate.** Without such a system, the institution cannot ensure that it is in compliance with the certifications it makes to the Federal government regarding the ethical use of human and animal subjects research and compliance with conflict of financial interest requirements.

Faculty members and RTT and SPA staff members stated that communication and correspondence with sponsors is not controlled; sometimes investigators contact sponsors for administrative purposes, sometimes administrative staff contact them for programmatic purposes. This is a dangerous practice that could lead to miscommunications, misinformation, and a failure to comply with sponsor requirements.

- **Recommendation: Arkansas State University should develop and enforce written procedures for communications with sponsors.** Procedures should describe which sponsor representatives should be contacted by which university representatives. Principal investigators/project directors should contact sponsors' programmatic staff about project progress, scientific matters, and the impact of planned changes to the project itself. University administrative staff should contact sponsors'

administrative/grants management staff about budgetary and administrative issues such as rebudgeting and requests for prior approvals.

Award closeout is an area of high risk for universities; failure to close awards out in a timely manner can result in a loss of funds, damage to reputation, and audit findings.

- **Notable Practice: SPA has developed detailed procedures for award closeout.** This includes a closeout checklist, a valuable aid in ensuring that all steps are taken to properly close awards. Staff members send regular email notifications as awards are scheduled to terminate, at 180, 90, and 30 days prior to termination.

SPA is to be commended for its level of attention to closeout. In order that all administrators involved in closeout know what is expected of them, procedural information should be highly visible.

- **Recommendation: SPA should ensure that this information is readily accessible on its Web site and reinforce the message through training.** No training sessions on closeout were listed in SPA's training schedule from the past three years; SPA should consider providing regular sessions dedicated to closeout procedures, including the closeout of subawards.

It is as important to document the institution's own progress on meeting project goals and programmatic requirements as it is to document monitoring of the subrecipient's progress. Neither RTT nor SPA staff members noted that they have any formal involvement in ensuring that deliverable and/or programmatic reporting requirements have been met.

- **Recommendation: SPA should require evidence of submission of all deliverables, including programmatic reports, at closeout.** This will create an audit trail and can be in the form of a copy of the entire deliverable/report or a printed notification that the report was received. Requiring the documents for closeout will help ensure that principal investigators/project directors forward them in a timely manner.

Information on submission of required programmatic reports for Federal grants is generally available online. Tracking compliance with this requirement is then a relatively simple matter of reviewing closeout status online and notating compliance. For non-Federal sponsors and for contractual obligations, tracking compliance may involve the active participation of the PI and/or DRA.

XII. Institutional Integration of Obligations Made with Sponsored Programs Activities

XII. STANDARD for Institutional Integration of Obligations Made with Sponsored Programs Activities.

The institution has developed mechanisms to interface separate oversight research areas within the institution that may be related to sponsored program activities. The institution provides appropriate linkages to and tracks commitments made with the acceptance of sponsor funding.

The institution has appropriate structures in place to coordinate activities between the IRB, IAUCUC and Biosafety (IBC) committees through the establishment of the Compliance Oversight Committee (COC). The COC includes the chairs of the IRB, IACUC and IBC, the Director of Research Compliance, the Director of Research Development, the Director of Environmental Health and Safety, and the Vice Provost for Research. The structure of the COC is designed to assure collaboration and coordination between all areas charged with assuring research compliance and serves as an exemplary structure.

Institutional obligations in compliance are identified through self-reporting at the time of proposal submission. Proposals subject to compliance requirements are entered into the Cayuse software system used by RTT for proposal submission. However, institutional actions on IRB, IACUC and IBC protocols are predominantly triggered at the award stage. When RTT receives notice of award, compliance information is passed along to the Director of Compliance to review. Compliance areas identified at the proposal stage are passed along from pre-award to compliance as part of award processing. The Director of Compliance does not have access to the Cayuse system any is usually unaware of compliance requirements until the time of the award.

The Director of Compliance is part of the "hand-off" team and meets with the PI as part of a team to communicate any compliance requirements of the award. It is at that point where the PI will typically begin running protocols through the appropriate institutional committees for review. While this process works reasonably well in the case of IRB protocols that fall under the exempt or expedited categories, the process leads to challenges in other areas. The typical processing time for an exempt or expedited IRB review is about 2-3 weeks, but can extent to a month or more for protocols requiring review by IBC, IACUC or the IRB full board. This can lead to significant delays before work can be done on awards that require protocol approval other than those that meet the exempt or expedited requirements of the IRB. Furthermore, it is not clear if notification of protocol approval is passed along to SPA. As a result, it may be possible for grant activities requiring compliance review to begin before all compliance requirements have been met. This could represent a significant area of risk for the institution.

- **Recommendation: ASU should consider a comprehensive review of compliance protocol procedures. Consideration should be given to possible actions on protocols prior to, or soon after, notification of award. At a minimum, a process should be in place to communicate with SPA and assure that award set up does not occur until all required approvals have been attained.** While initiating the process for approval of protocols at the time of proposal submission will result in increased workloads on the compliance committees, there are substantial benefits in allowing grant activity to begin almost immediately after notification of award.

The institution also has a firm foundation for addressing agency requirements related to conflict of interest. Again, however, institutional actions of COIs tend to occur at different points in the proposal/award process. The Director of Compliance works with the Vice Provost for Research on COI and responsible conduct of research and is responsible for reporting to funding agencies consistent with their requirements. Once a COI has been identified, the PI, RTT staff, and the Legal Counsel work together to develop an appropriate management plan. Again, given extended period of time for legal review, the institution should give strong consideration to developing COI management plans at the time of proposal submission. It appears that this has already been identified as an area of focus for the new Director of Compliance and the Review Team encourages this process to continue. It is less clear that these management plans, once developed, are routinely tracked by the Compliance Office and periodically reviewed to assure compliance. It is also not clear if SPA or other institutional committees, such as the IRB, receive notification of projects involving COIs and assure that awards to not begin until an appropriate management plan has been approved.

- **Recommendation: ASU should conduct a review of COI and RCR procedures particularly with regard to monitoring appropriate management plans and working with SPA and other appropriate review committees to assure proper management plans have been enacted prior to initiation of award.**

XIII. Export Controls

XIII. STANDARD for Export Controls.

> The institution understands the scope of export controls, embargoes and trade sanctions in the context of their institutional activities and in particular to their sponsored programs. Policies and a compliance program for export controls have been developed and are appropriate to the scope of research activities within the institution.

Administrators and staff members noted that compliance with export control regulations has been a particular area of concern for the University. The Director of Research Compliance is relatively new to her position and is working diligently to ensure that all regulations and requirements are met and that information is accessible and training

and awareness activities are in place for faculty and staff members. As the Director continues in her role, she should pay special attention to enhancing her knowledge of and remaining current on export control issues, attending training as appropriate.

- **Recommendation: The Director of Research Compliance should work with the VPR to develop an annual training plan. Success in completing planned training should be a factor in the Director's annual performance review**

Because the University community is eager to remain in compliance with all export control regulations, high visibility for export control issues is vital.

- **Notable Practice: The RTT Web site includes a page dedicated to export controls. This page includes links to internal forms and checklists, to resources on laws/regulations, and to training materials.**

Internal forms include detailed checklists and certifications for international travel and research projects; a departmental approval from for technology control plans; and a template for technology control plans. The availability of these detailed materials is a positive step in the direction of awareness of and ultimately compliance with all export control regulations. Because the University community will rely on these materials as well as on the Director of Research Compliance for guidance on export control questions, they must always be current.

- **Recommendation: RTT should immediately review the materials posted to the export controls page of its Web site to ensure that all materials are current and that all contact information is correct. In future, the Director of Research Compliance should regularly review and update materials as appropriate.**

XIV. Research Integrity

XIV.A. STANDARD for Research Misconduct.

> The institution has policies and procedures that govern research misconduct. The research misconduct policy and procedures follow established federal standards, providing notification to sponsors, communication to the parties involved, and protection for whistleblowers.

The Vice Provost for Research and Graduate Studies (VPR) is responsible for compliance with all regulations and requirements for responsible conduct of research (RCR). The VPR is supported by the Director of Compliance, one of the VPR's direct reports within RTT. There have been no reported violations of RCR. Staff are

knowledgeable of current practice and standards and have an appropriate understanding of sponsors policies, practices and regulations.

According to documents provided by the institution, RCR is covered under the ASU Governing Principles for the Responsible Conduct of Research (RCR Policy). The RCR Policy is commendable in that it requires RCR training for all faculty and students who participate in externally funded programs. In that, it goes beyond the minimal requirements of the federal government that currently apply RCR only to specific agencies. The responsibilities under the policy appear to be limited only to training and there seem to be important omissions in the RCR Policy. The policy does not include information about how allegations of misconduct are reported, how investigations are conducted, or any processes for appeals. The policy does not make provisions for notifying funding agencies. And while whistleblower protection is assumed under the broader university policy, it is appropriate for whistleblower protections be listed in the RCR Policy, itself. It is possible that explicit procedures for these activities are published internally. If so, strong consideration should be given to publishing the procedures on the web so that the research community has easy access to this information.

- **Recommendation: ASU should conduct a review of university's Governing Principles for the Responsible Conduct of Research to clarify practices for reporting and investigating allegations of misconduct, along with appropriate processes for whistleblower protection and appeals.** The Governing Principles for RCR should include provisions for reporting findings to external agencies.

XIV.B. STANDARD for Financial Conflict of Interest.

> The institution has policies and procedures that govern individual financial conflict of interests. Conflict of interest policies require the disclosure and review of financial interests as defined, at a minimum, by federal regulations and policy. The institution shares information on financial disclosures and review outcomes across administrative and academic offices as appropriate.

The Director for Research Development (DRD) is responsible for compliance with all regulations and requirements for Financial Conflict of Interest (FCOI) as they pertain to sponsored research. The DRD is supported by the Director of Compliance on matters related to FCOIs in research. Staff are generally knowledgeable of current practice and standards and have an appropriate understanding of sponsors policies, practices and regulations. FCOI management plans are developed through collaboration between the PI, RTT staff, and the Office of Legal Counsel and potential issues with regard to the approval process are discussed in more detail under Section XII.

Financial conflict of interest, as it applies to meeting the institution's research obligations, is subsumed under the ASU system policy on Conflict of Interest or

Conflict of Commitment (COI). Under the policy, all employees must submit a COI disclosure at least annually and the disclosure must be updated any time there is a change in status that would affect COI. The disclosures are used as documentation at the time of proposal submission for the review of any potential conflicts of interest that may affect he research project. The policy provides clear guidance on submission and approval of disclosure statements the development of appropriate management plans in cases where a conflict has been identified. As the policy is not specific to research, it does not make provisions for notification of funding agencies. It is also not clear what role the appropriate research offices have in assuring that any conditions developed in the management plan itself are being met nor is it clear that SPA is notified prior to award setup when COIs may be involved.

- **Recommendation: The Vice Provost for Research, in collaboration with RTT and SPA staff, should develop written internal procedures that complement the ASU Conflict of Interest policy to assure proper reporting of FCOIs to funding agencies and appropriate oversight of COI management plans.**

XV. PROTECTION AND OVERSIGHT RELATED TO RESEARCH ACTIVITIES

Standard XV is only applied to institutions with less than $8 million in sponsored program awards that are undergoing a peer review and were not included in this review.

XV.A. STANDARD for Use of Humans in Research.

The institution has effective systems in place that comply with federal and state regulations for the ethical protection of human subjects.

XV.B. STANDARD for Use of Animals in Research.

The institution has effective systems in place that comply with federal and state regulations for the ethical protection for the humane care and use of animals.

XV.C. STANDARD for Biohazards and Select Agents.

The institution has policies and procedures in place governing the safe handling and use of biohazards, including rDNA, infectious agents and blood-borne pathogens, and select agents in research, clinical and teaching activities. The accepted biosafety level at the institution is explicitly addressed in policy and guidance. The Institutional Biosafety Committee is clearly defined in policy and operates effectively with other administrative offices.

XV.D. STANDARD for Radiation and Laser Safety.

The institution has policies and procedures in place governing the safe use of radiation and lasers in research and sponsored activities in compliance with federal and state regulations. Adequate staff and other resources are dedicated to training, oversight, and preparedness for laser or radiation-related emergencies.

XV.E. STANDARD for Specialized Research Activities.

The institution has appropriate safeguards in place for research activities that are a part of research and other sponsored activities and require specialized oversight such as diving, boating, flight safety, or mining.

XV.F. STANDARD for Maintaining Currency in Field.

Institutional expectations are clear that the staff involved with protection and oversight related to research activities maintain currency in their understanding of governing regulations and policy.

Appendix A: National Standards for Effective

Sponsored Program Operations

The National Council of University Research Administrators (NCURA) developed these National Standards to represent the institutional baselines that provide a supportive environment for the conduct of research and other sponsored activities as well as the broad operational and core functional areas of sponsored programs management.

Unlike an audit, this peer review performs an assessment of your research administration "program" that goes beyond merely highlighting deficiencies in process. The assessment contains three interrelated features: senior and experienced research administrator Reviewers, the National Standards, and a philosophical approach that provides consistency in the review process with an understanding of institutional culture. These key features result in an assessment of **effectiveness** of sponsored research environments at the institutions undergoing peer review.

The NCURA National Standards are used by experienced and senior research administrators to assess the effectiveness of the research administration program. While recognizing that institutions differ in organizational structure and institutional priorities, these Standards reflect how the institution integrates the research enterprise with its institutional goals and expectations and operationalizes effective sponsored programs administration. The Standards allow Reviewers to assess how closely that integration relates to institutional and stakeholder goals and expectations. The Standards contain a list of over 165 features that are utilized by the Reviewers during their assessment and that are used as the basis for the written report.

Appendix B: NCURA Peer Review Team Bios

NCURA
supporting research...together

NCURA Review Team Bios for
Arkansas State University

The National Council of University Research Administrators has developed a formal system of assessment for offices of sponsored programs, in part, from its purpose as a professional development organization. The mission of professional development organizations, like NCURA, is to provide education and training to its members as well as others within the research community. Many educational efforts implicitly, if not explicitly, provide information on effective practices, techniques for success, and models of excellence. Setting standards and identifying quality of organizational performance, therefore, are expected functions of professional development organizations. In fact, no other activity of a professional development organization may be as important as the articulation of the standards and core practices of the profession. The NCURA system of peer review was developed for this purpose.

Peggy S. Lowry TEAM LEADER
Number of Years in Research Administration: 39
Institutions: University of Illinois at Urbana-Champaign, Oregon State University, Ball State University, Murray State University

Peggy has been a team member or team lead on over 30 peer reviews of research administration offices, received evaluations of her offices, and has taught national workshops on sponsored program assessment. Peggy has led office self-studies and participated in institutional accreditation self-studies. She authored the chapter: "Assessing the Sponsored Research Office" (NCURA/AIS *Sponsored Research Administration—A Guide to Effective Strategies and Recommended Practices*) and published peer review articles: "But the Emperor Has No Clothes On! Or Assessing Your Operation with Fresh Eyes" and "Learning Your ABCs: Adaptability, Balance, and Culture" (NCURA Magazine). Peggy currently serves as the Manager for the NCURA Peer Review Program as well as serving as a Peer Reviewer.

Peggy served until her retirement in 2007 as Director of Sponsored Programs and Research Compliance at Oregon State University where she oversaw sponsored programs ($250+ million in awards), non-financial research compliance areas, and served as Conflict of Interest Officer. She returned from retirement to assist by leading the University's new Office of Research Integrity, until 2011 when she retired again. She currently serves as Manager for the NCURA Peer Review Program. Her career includes 11 years at Oregon State; 22 years at the University of Illinois--Urbana-Champaign as Assistant Vice Chancellor for Research/Director, with 10 years as a College-level administrator; and seven years in predominantly undergraduate universities: Ball State University and Murray State University in Director and Associate Director positions. At all of her universities she has worked extensively with faculty, Deans, and senior leadership. She served on numerous university/faculty committees, created/implemented university-wide policies, and engaged in department-central research administrator networking groups. At Ball State and Murray State she additionally focused on faculty development, institutional incentives for research, and integrating research with undergraduate education. While at Murray State University, she created a faculty Research Policy Committee to help promote the role of research at a predominantly undergraduate university; increased emphasis on research led to doubling the sponsored programs award level.

Peggy has given over 300 national, regional and local presentations and workshops. She has served on numerous national NCURA committees and twice served on their Board of Directors. During her career she served as a NCURA national workshop faculty for Fundamentals of Research Administration and Sponsored Projects Administration Level II, Chair of the Nominating and Leadership Committee, a member of the Editorial Review Board for *A Guide to Managing Federal Grants for Colleges and Universities,* and co-Chair of the NCURA newsletter. Peggy received NCURA's national Award for Distinguished Service in Research Administration in 2006 and the Award for Outstanding Achievement in Research Administration in 2011. She

additionally served several terms on the Board of Directors of the International Society of Research Administrators and received several national awards from that organization. She has been a member of the Council on Governmental Relations.

Mary Louise Healy

Number of Years in Research Administration: 26
Institutions: Johns Hopkins University, Towson University

Mary Louise has been a research administrator since 1988, at both research-intensive and predominantly undergraduate institutions, public and private. Since November 2011, she has led the research administration staff of the Krieger School of Arts and Sciences at Johns Hopkins University, first as Associate Director and currently (since August 2013) as Director. As such is responsible for pre- and post-award administration of all awards for the School, totaling approximately $60 million per year. She serves as advisor to the Vice Dean for Research on all matters relating to sponsored projects, including funding trends and policy formulation. Prior to her position in KSAS, she worked at Towson University for 21 years, first as Assistant Director of the Office of Research Administration (1990-1994), then as Director of that office (1994-2007), and finally as Assistant Vice President for Research (2008-2011). At Towson University, she was responsible for all pre- and post-award activities of the University, including financial post-award and compliance functions.

During her tenure at Towson University, sponsored projects funding increased steadily each year, most years by 10% or more. As sponsored funding increased, so did compliance issues and thus staffing needs. The office grew and was reorganized several times under Mary Louise's tenure, to ensure continuing compliance without sacrificing customer service and individualized research development services to investigators.

At Towson University, Mary Louise was the IRB administrator; had responsibility for committing and tracking institutional cost share funds; administered three separate internal funding programs; and was responsible for research and sponsored projects communications as well as for the day-to-day management of proposals and awards.

Prior to joining Towson University in 1990, Mary Louise served first as Research Services Assistant then as Sponsored Projects Specialist at Johns Hopkins University Homewood Research Administration, first concentrating on identifying funding opportunities then moving into day-to-day proposal and award management.

Mary Louise is a long-time member of NCURA and has served as Chair for Region II, co-Chair for the Pre-Award Research Administration conference in 2014, Chair for the Region II Spring Meeting in 2013, co-Chair for the Region II Spring Meeting in 2012, and as a member of the Region II Steering Committee (most recently for a term ending in 2015) and Leadership Development and Nominating Committee (2013-2015). She is currently serving as a mentor in the Region II Cheryl-Lee Howard Mentor Me Program and as a traveling workshop faculty member for Region II. She has presented extensively at national and regional meetings. Mary Louise is a graduate of the NCURA Leadership Development Institute and Executive Leadership Program.

Additionally, Mary Louise is an adjunct faculty member at the Community College of Baltimore County where she teaches a non-credit course on proposal writing and an adjunct faculty member at Towson University, where her courses have included Grant Writing in Education (graduate course) and Using Information Effectively (undergraduate course).

Jerry Pogatshnik
Number of Years in Research Administration: 14
Institutions: Southern Illinois University Edwardsville, Eastern Kentucky University

Jerry is the Dean of the Graduate School and Associate Vice President for Research at Eastern Kentucky University. He received his Ph.D. in physics from the University of Connecticut and served as a visiting research professor at the Oak Ridge National Laboratory from 1986 to 1988. He joined the faculty in the physics department at Southern Illinois University Edwardsville (SIUE) and achieved the rank of Professor before moving on to become the Associate Dean of the Graduate School. In 2005, he was appointed to the newly created position of Graduate Dean and Associate Vice President for Research at Eastern Kentucky University.

While serving as Associate Dean at SIUE, Jerry was responsible for pre-award administration and faculty development. He implemented SIUE's First Summer program for new tenure-track faculty, to provide comprehensive training on proposal development and both fiscal and non-fiscal compliance. During his tenure at Eastern Kentucky University, he led the development of a comprehensive policy base for the governance of research administration. He serves as chief compliance officer for human subjects research, responsible conduct of research, conflict of interest, animal care and use, and laboratory safety. As head of the Pre-Award office, he is also responsible for faculty development, proposal review and submission, contracts and contract negotiations, and works collaboratively with the Office of Financial Affairs on fiscal compliance.

Jerry has been actively involved with NCURA throughout his career in research administration. He has co-presented at numerous workshops and concurrent sessions and served multiple times on the national program committees for the NCURA Annual Meeting, the Financial Research Administrators' Meeting (FRA) and the Pre-Award Research Administrators' Meeting (PRA). Jerry was a member of the inaugural class of NCURA's Leadership Development Institute. He served as a member of the Board for Region IV and went on to chair the PUI Neighborhoods Committee and the NCURA Neighborhoods committee. He served as a NCURA national workshop faculty for Fundamentals of Research Administration and was a panelist for three NCURA DVD/Satellite TV programs: *Effective Proposal Development, Building a Culture of Scholarship at a PUI*, and *It Takes a Village to Manage Awards*. Jerry also served a three-year term as co-editor of the *NCURA Magazine*.

Appendix C: Charge Letter

ARKANSAS STATE UNIVERSITY

FINANCE & ADMINISTRATION
Sponsored Programs Accounting | P.O. Box 1260, State University, AR 72467 | o: 870-972-2400 | f: 870-972-3418

October 20, 2014

NCURA Peer Review Team

Ms. Lowry, Ms. Healy, and Mr. Pogatshnik,

Arkansas State University-Jonesboro (ASU-J) requests an NCURA Peer Review. My institution is interested in learning more about how to effectively and efficiently serve all stakeholders in the research process, including sponsors, faculty, staff and administration. It is my hope that this Peer Review will give ASU-J useful and timely information that all offices can utilize when making plans for the future.

Research administration is performed by two offices at ASU-J. Research and Technology Transfer (RTT) is primarily charged with the pre-award area and compliance, while Sponsored Programs Accounting (SPA) is involved in post-award financial compliance and cash management. RTT is part of Academic Affairs and SPA is part of Finance and Administration, but the offices are in close proximity physically and work together often on issues that affect both offices. The staff in both offices are fairly new to research administration, but are continually involved in professional development and training to improve our knowledge and abilities.

I understand that the review will utilize the NCURA National Standards. In your review, I ask that in particular you pay attention to the following:

I.C. Research Administration Staffing

VI. Information Management

I look forward to your visit and your report.

Thank you,

Nikki Turner
Director, Sponsored Programs Accounting

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Appendix D: Site Visit Itinerary

Arkansas State University 3 Day Site Visit Itinerary

Sunday, November 16, 2014		Hilton Garden Inn
		NCURA Team - Executive Session

Monday, November 17, 2014
Transportation pick-up details: Nikki Turner, Sponsored Programs Accounting, will pick up the team at 7:15 am from the hotel lobby
Location of Meetings: Dean B. Ellis Library, 6th Floor Conference Room

Time	Activity
8:00-8:45	Entrance Meeting: Dr. Andy Sustich, Vice Provost for Research and Graduate Studies
9:00-10:00	Rebekah Craig, Director of Research Development
10:00-10:30	Executive Session
10:30-11:30	Dean's Council
11:30-12:00	Henry Torres, CIO
12:00-12:30	NCURA Executive Session - Working Lunch
12:30-2:00	Pre-Award Staff - Emily Devereux, Associate Director of Research Development; Latonya Tidwell, Program Coordinator
2:00-2:15	Executive Session
2:15-3:00	Dr. Lynita Cooksey, Provost
3:00-3:15	Executive Session
3:15-3:45	Katie Prescott, Legal Counsel
3:45-4:00	Executive Session
4:00-5:00	Faculty Group - Science & Math, Engineering, ABI, and Agriculture
Transportation pick-up details:	Nikki Turner will take the group back to the hotel after the last meeting.

Tuesday, November 18, 2014							
Transportation pick-up details: Nikki Turner will pick up the team at 7:30 am from the hotel lobby.							
8:00-8:45		Dr. Russ Hannah, Associate Vice Chancellor for Business and Finance and Myra Goodwin, Controller					
8:45-9:00		Executive Session					
9:00-9:30		Internal Audit Phone Call					
9:30-10:30		Contracts Unit - Rebekah Craig, Director of Research Development and Nikki Turner, Director of Sponsored Programs					
10:30-10:45		Executive Session					
10:45-11:45		Nikki Turner, Director of Sponsored Programs Accounting					
11:45-1:00		NCURA Executive Session - Working Lunch					
1:00-2:30		Post-Award Staff - Whitney Lumpkin, Accountant; Jessica Daniels, Accountant and Chelsea Gambill, Sponsored Programs Analyst					
2:30-2:45		Executive Session					
2:45-3:45		Departmental Research Administrators - Marilyn Wilhide, College of Science and Math; Elizabeth Wakefield, College of Education; Lisa Kihlstadius, Chemistry & Physics; Molly Alexander, P3 (Major Project); Maria Barner, Arkansas Biosciences Institute					
3:45-4:00		Executive Session					
4:00-5:00		Compliance Oversight Committees - Jenny Estes, Director of Compliance; Starr Fenner, Director of Environmental Health & Safety; Amy R. Pearce, Chair of IRB; Fabricio Medina-Bolivar, Chair of IBC; Richard Grippo, Chair of IACUC; Rebekah Craig, FCOI; Andy Sustich, Scholarly Misconduct					
Transportation pick-up details:		Nikki Turner will take the group back to the hotel after the last meeting.					

Wednesday, November 19, 2014

Transportation pick-up details: Nikki Turner will pick up the team at 7:30 am from the hotel lobby.

Time	Details
8:00-8:45	Jessica Blackburn, Associate Director of Foundation Relations
9:00-10:00	Faculty Group - Nursing, Business, Humanities, Education, Communication and Fine Arts
10:00-10:30	Executive Session
10:30-12:00	Exit Session with Dr. Sustich, Dr. Hannah, Dr. Cooksey and Dr. Frey
Transportation pick-up details:	Research and Tech Transfer Personnel will drive reviewers to Memphis airport

Appendix E: NCURA Resources

NCURA
supporting research...together

National Council of University Research Administrators
First and Largest Association for Research Administrators
Established 1959

Who are Research Administrators and What is NCURA?

The research administrator works with dedicated and brilliant researchers and scholars who often are on the cutting edge of their field and with the U.S. government and private sponsors that require stewardship for the funding they provide. NCURA is the professional home to 7,000+ research administrators and we foster innovative and collaborative education and networking as we support research...together.

NCURA HOSTS 3 NATIONAL MEETINGS A YEAR

ANNUAL MEETING OF THE MEMBERSHIP

The annual meeting of the membership is held in August each year in Washington, DC. Over 2,000 of our 7,000+ members attend.

We begin with a full day of workshops and senior level seminars which are a supplemental training program open to all registrants of the annual meeting. This in-depth, targeted training and professional development includes offerings for those new to the profession to our most senior level members.

We then embark on two and a half days of presentations, discussions, open forums and networking opportunities spanning all areas of research administration including, but not limited to, Pre-Award, Post-Award, Compliance, Departmental, Intellectual Property, Contracts, International, Predominantly Undergraduate Institutions, Electronic Research Administration, and Medical Center/Hospital Issues. Attending the annual meeting gives our members the opportunity to participate in sessions over a full range of topics to support their need for information in a variety of areas.

This annual reunion of the membership also includes our Sunday dinner, Tuesday evening event, dinner groups, regional networking events and numerous volunteer activities that create the opportunities for you to meet and connect with your colleagues and create your peer network.

In addition to the education and networking opportunities the annual meeting of the membership provides, our sponsor and exhibitor partners will be available to share information on the products and services to support you and your institution.

> "NCURA keeps you one step ahead of the curve."
>
> Tom Wilson,
> Assistant Vice President/ Senior Research Administrator, Rush University Medical Center

FINANCIAL RESEARCH ADMINISTRATION (FRA)

The community of those engaged in the financial administration for research was brought together in 2000 for a special topic conference on post-award issues. This community has come together each year since then for their own conference which has grown from 300 participants in the year 2000 to over 1,100 in 2013.

This conference travels to a new location each year and is held between February and late March. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.

PRE-AWARD RESEARCH ADMINISTRATION (PRA)

In 2006, the NCURA Board of Directors unanimously agreed to offer a Pre-Award Research Administration (PRA) Conference.

The vision for this conference is to create an annual PRA Conference complementing the existing FRA (Financial Research Administration) annual conference.

This conference of over 500 participants travels to a new location each year and is held back to back with the FRA conference noted above. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.

Immersion Education

NCURA offers 4 different workshops that are each 2 ½ days and travel around the country throughout the year. And, with a commitment of 60 participants, NCURA can bring one of these 4 workshops to your campus!

FUNDAMENTALS OF SPONSORED PROJECT ADMINISTRATION

Individuals involved in sponsored projects administration are faced with a multitude of challenges: becoming knowledgeable about federal regulations and individual agency requirements, providing assistance to faculty, gathering information, administration of awards, and many other tasks. The purpose of this program is to provide participants (this program is intended primarily for the newcomer – less than 2 years experience) with a broad overview of the various aspects involved in sponsored projects administration, including preparation and review of proposals, negotiation and acceptance of awards, financial and administrative management, closeout and audit, as well as the relevant compliance issues.

CRITICAL ISSUES IN RESEARCH ADMINISTRATION (SPA II)

For more experienced research administrators, NCURA created "Sponsored Project Administration: Level Two, Critical Issues in Research Administration" (commonly referred to as "SPA II"). This program offers participants an opportunity for in-depth instruction in four core aspects of research administration: institutional compliance responsibilities, proposal creation and submission, contract and subaward review, and post award financial administration. Each of these topics will be explored through a combination of case study analysis and discussion.

FINANCIAL RESEARCH ADMINISTRATION WORKSHOP (FRA)

The Financial Research Administration Workshop focuses primarily on the financial aspects of research administration. This workshop provides an in-depth look at financial compliance issues through a combination of lecture, case studies, review of Federal audit reports, and a discussion of best practices. The workshop presents the financial issues of sponsored programs management using a 'cradle-to-grave', award lifecycle approach, and discusses the impact of the financial issues at each stage of award management.

DEPARTMENTAL RESEARCH ADMINISTRATION WORKSHOP (DRA)

Administrators who work at the department and college level have unique challenges. Like central offices, we must have the knowledge of pre- and post-award functions. What distinguishes the departmental research administrator from other research support functions is being intimately involved with all facets of the administration process, daily interaction with faculty, as well as other departmental-specific responsibilities.

This program examines the foundations of research administration in the context of departmental administration – the transactional level. The program will concentrate on applying best practices to a department administrator's day-to-day activities.

NEW NCURA FUNDAMENTALS OF SPONSORED PROJECT ADMINISTRATION: GLOBAL EDITION

"We are, in Qatar University, very pleased to be the first institution in which to hold NCURA's International workshop outside the States. Our experience with you was wonderful and fruitful, and the feedback we are receiving from participants proves the success of the workshop."

— Dr. Moumen O. Hasnah
Associate Professor of
Medical Physics
Director, Office of Research
Qatar University

For information on how you can bring this workshop to your country, please send your request to NCURAglobal@ncura.edu

Education when you want it

NCURA 8 WEEK ONLINE TUTORIALS - LEARN AT YOUR OUR PACE!

These primers are intended for those new to each area, or who have had very limited exposure.

Primer on Clinical Trials
We have developed a thorough overview of this complex process. The course will focus on key administrative, financial, and regulatory issues that arise in planning, funding, conducting, and closing-out clinical trials.

Primer on Federal Contracting
Since Federal contracts are very different from federal grants, we have developed a thorough overview of this complex process.

Primer on Subawards
This online tutorial is focused on subcontracting programmatic effort under federal grants and other financial assistance awards. "Subcontracting" and "third party agreements" cover a wide variety of activities. The course has been divided into a series of lessons that deal with aspects of the subaward crucial to the Research Administrator.

NEW **Primer on Intellectual Property in Research Agreements**
This online introductory course in intellectual property is designed for university personnel working in contracts and grants, sponsored research and technology transfer offices. Its goal is to provide a basic background in issues of intellectual property management, and practice in analyzing and drafting research and licensing agreements.

YOUTUBE TUESDAY

NCURA produces 2-3 minute videos on diverse research administration topics and posts them on our YouTube channel each Tuesday. Institutions are welcome to use these videos in their on-campus training programs. With over 400 subscribers and over 120,000 views on the channel since its July 2011 inception, this is a resource we encourage you to check out! Find us at http://www.youtube.com/user/ncura1959

WEBINARS

These 90 minute online events are live with opportunities to ask the presenter(s) your questions. The audio is delivered directly to you over the telephone to provide clear, reliable sound quality.

Invite as many people for one low price. For large groups, use a speakerphone to deliver the audio and a projection system to deliver the web component.

Each site license includes:

- One set of materials. (The person who registers for the event receives the materials by email and may make copies for those who attend.)
- One toll-free telephone connection to the event.
- One Internet connection to the event for the web component.

After the live date, the webinars are also available for purchase as a mp3 download or CD-Rom. Topics have included:

- Subrecipient Monitoring
- The Daily Management of Awards
- Making FFATA Transparent
- How Fraud Happens and How You Can Protect Your Institution
- Managing Effort: Truth or Consequences
- Negotiation Tools and Tactics for the Research Administrator

NCURA TV LIBRARY

All programs are DIRECT-TO-DVD which means you and your staff can schedule your training whenever you want it.

NCURA TV is still the most COST-EFFECTIVE way to train your entire staff! Registrants are also granted a license to reproduce each program for use on campus at any time.

These 2-3 hour programs include the following topics and more!

- Technology Transfer Issues for the Research Administrator
- Export Controls and Other Security Concerns
- It Takes a Village to Manage Awards: Post-Award Issues for Pre-Award & Departmental Administrators
- ABC's of the Federal Cost Principles
- Managing Interactions and Potential Conflicts with University Spinoffs and Other Small Businesses for the Department Administrator
- Negotiating Federal Contracts and Pass-through Awards

TOGETHER

Programs and Resources

NCURA COMMUNITY – COLLABORATE!

NCURA's professional networking platform, Collaborate, hosts online topical communities such as: Pre-award, Post-award, Electronic Research Administration, Compliance, Predominantly Undergraduate Institutions, International and Departmental. The communities host chats, interviews, list servs and resource pages for each area. This is a great way to stay connected and even to volunteer while being home on your campus.

FELLOWSHIP PROGRAM

The Fellowship program has two underlying objectives: (i) the training of research administrators, and (ii) enhancing U.S. and foreign research collaboration. This program is intended to reduce barriers to international research administration and create an administrative environment conducive to international collaboration.

The program will provide an opportunity for U.S. research administrators to travel to research organizations abroad and immerse themselves in a program of mutual learning and knowledge exchange.

NCURA MICROGRAPHS, MONOGRAPHS AND LIVING TEXTBOOKS

- A Primer on Clinical Trials
- A Primer on Intellutual Property
- Cost Accounting Standards
- Cost Sharing: An Overview
- Effort Reporting: An Overview
- Establishing and Managing an Office of Sponsored Programs at Non-Research Intensive Colleges and Universities
- Facilities and Administrative Costs in Higher Education
- The Role of Research Administration, Second Edition
- Writing and Negotiating Subawards Under Federal Prime Awards
- OMB Circular A-21 Mini-Guide
- OMB Circular A-133 Mini-Guide
- OMB Circular A-110 Mini-Guide
- Regulation and Compliance: 2011
- Sponsored Research Administration: *A Guide to Effective Strategies and Recommended Practices*

   Visit NCURA's Online Store @ www.ncura.edu to purchase any of these publications.

NCURA MAGAZINE

NCURA's magazine is published six times a year with cutting edge pieces on management, perspectives on federal policy written by members and non-members, and the latest information and explanations on topics of interest to research administrators.

RESEARCH MANAGEMENT REVIEW – NCURA'S SCHOLARLY JOURNAL

As the scholarly journal for the National Council of University Research Administrators, the RMR is concerned with the broad range of issues affecting the administration of research and the changing research environment at the national and international levels. The RMR provides a forum for the dissemination of knowledge about the study and practice of the research administration profession.

PEER REVIEW PROGRAM

The NCURA Peer Review Program is a powerful tool for enhancing your sponsored programs operations. In a confidential process similar to an academic program review, NCURA matches a team of senior research administrators to your institution. The review utilizes National Standards that represent the core and vital functions of sponsored programs-regardless of size and type of institution. After reviewing background materials you provide, the Reviewers conducts 360-degree interviews with institutional stakeholders during a site visit. At the completion of the review, the institution receives a detailed written report that provides valuable feedback addressing program strengths and areas for improvement. Use the peer review for risk management/compliance, enhanced faculty service, operational efficiencies, business process improvement, and improved communications.

Visit the Institutional Programs Tab on the NCURA home page for further information.

NEW PEER ADVISORY SERVICES

Research Administration Planning is geared to institutions that would like assistance in conceptualizing the process for developing new or revised policies, procedures, and management structures, in the context of U.S. based best practices. The focus assists the institution in integrating commitments for extramural funding and conceptualizing and strategizing longer-term plans for establishing a solid foundation for research administration.

Focused Analysis brings senior research administrator expertise to your institution to analyze a specific research administration function drawn from the National Standards and to provide an analysis based on U.S. best practices.

Directed Education brings the senior research administrator's expertise to provide targeted education at your institution in an area that is critical to helping you build a solid research administration infrastructure and to manage risk. The directed education is tailored to your specific topic or need.

Visit the Institutional Programs Tab on the NCURA home page for further information.