



VCU

VIRGINIA COMMONWEALTH UNIVERSITY

School of Medicine

Research Administration

Quarterly Meeting

September 2014

Today's Topics

1. Uniform Guidance (credit RACM 8/27/14 slides)
2. RAMS-SPOT Implementation (credit RACM 8/27/14 slides)
3. Students, Post-Docs & Sponsored Projects
4. Salary Cap Cost Share Management
5. Other Topics

Uniform Guidance

- Plan to attend VCU training sessions this fall
- Become familiar with the new document:
 - 2 CFR 200 – Basic Layout
 - 6 Subparts: A-F
 - Subpart A – Acronyms & Definitions
 - Subpart B – General Provisions
 - Subpart C – Pre Award
 - Subpart D – Post Award
 - Subpart E – Cost Principles
 - Subpart F – Audit Requirements
 - 11 Appendices – I through XI

Uniform Guidance

- COFAR website: <https://cfo.gov/cofar/>
- Uniform Guidance: [2 CFR 200](#)
- COFAR FAQs:
 - First Round: [2-12-2014](#)
 - Second Round: [8-29-14](#)

Uniform Guidance

Procurement

Compare existing VCU procurement procedures to new federal standards. Try to coordinate with other Virginia public universities. 12 month grace period for implementation anticipated.

Subrecipient Risk Assessment & Monitoring

Analyze Uniform Guidance and VCU processes. Utilize pending FDP templates for subaward agreements and risk assessment. Focus on risk of subs not subject to Single Audit. Strengthen existing internal controls.

Closeouts

90 days means 90 days: Monitor guidance from OMB and DHHS. Prepare for NIH subaccounts in 2015. Improve internal timelines for closeout.



Uniform Guidance

Fixed Amount Awards

Fixed price subawards limited to Simplified Acquisition Threshold (currently \$150,000). Prior Federal Agency approval required. How to handle current FP clinical trials and subaward situations?

Administrative / Clerical

Salaries still normally treated as indirect cost. Direct charge only if (1) integral, (2) allocable, (3) justified in budget and has agency approval, and (4) not also recovered as indirect cost.

Compensation - Fringe Benefits

Monitor for anticipated OMB FAQ clarification. VCU (cash basis) unused terminal leave sometimes direct charged to grants. Prepare for improved tracking.

1838

Uniform Guidance

MTDC	“Participant support costs” to be added to exclusions list. Monitor for clarification that “subcontractor” refers only to subrecipient relationships (and not also procurement.)
Subrecipient vs. Contractor Determination	No change to characteristics of a subrecipient vs. contractor (vendor.) Substance of the relationship more important than form of the agreement; must document.
Supplies / Computers	Direct charge of computing devices allowable, must be “essential and allocable”, but not necessarily solely dedicated to federal award.

Uniform Guidance

Effort Reporting

Continue to use current Effort Reporting / ECRT system. Monitor outcome of FDP demonstrations on payroll confirmation.

Cost Share

Federal Agency must have OMB approval and publish in program announcement.

Indirect Cost Rate

Federal Agency / Pass Through Entity must honor negotiated rates unless limited by law or regulation or approved by agency head. "De minimis" rate of 10% MTDC when no rate agreement / new.



Uniform Guidance

Single Audit Requirement

Threshold in FY expenditures in Federal awards increasing from \geq \$500K to \geq \$750K.

Performance Management

OMB-approved governmentwide standard information collections are acceptable. Research Performance Progress Report (RPPR) meets standard.

So much that is...SAME SAME

(But different, so be sure to come to offered training later in the fall)



RAMS-SPOT Implementation

Research Administration Management System – Sponsored Programs Online Tracking

- Will be replacing InfoEd (VCUeRA).
- Vendor = Click Commerce, same as IRB and IACUC systems.

Goal of the System Include:

- Paperless routing & record storage
- Budgeting in the system (including revisions)
- Communication in system
- Documents scanned to directly to record
- Improved task management

RAMS-SPOT Implementation

Submission Pilot – December 2014 – February 2015

- Preparation, Approval Routing, Review, and Submissions of selected...
 - New proposal submission
 - CDA (Confidentiality Non-Disclosure Agreements)
 - Master Agreements
 - Pre-Award Reviews
- Testing system functionality for a variety of proposal/sponsor types
- SOM will be involved in the pilot
- CAR Members will coordinate selection of pilot proposals in consultation with OSP.
- As I learn more from OSP, **looking for volunteers** for the pilot- your area must have submissions planned for Dec 2014 – Feb 2015 timeframe!

RAMS-SPOT Implementation

Phase 1– March 1 – August 31, 2015

- Preparation, Approval Routing, Review, and Submissions of **ALL** proposals, CDAs, and Master Agreements

Phase 2 – September 2015

- Award Processing
- Continuation/Supplemental proposals
- Prior Approval/Expanded Authority Actions
- Closeout

RAMS-SPOT will be system of record in FY2016... Bye Bye InfoEd

RAMS-SPOT Implementation

An early preview of the system left us.....

Optimistic!!

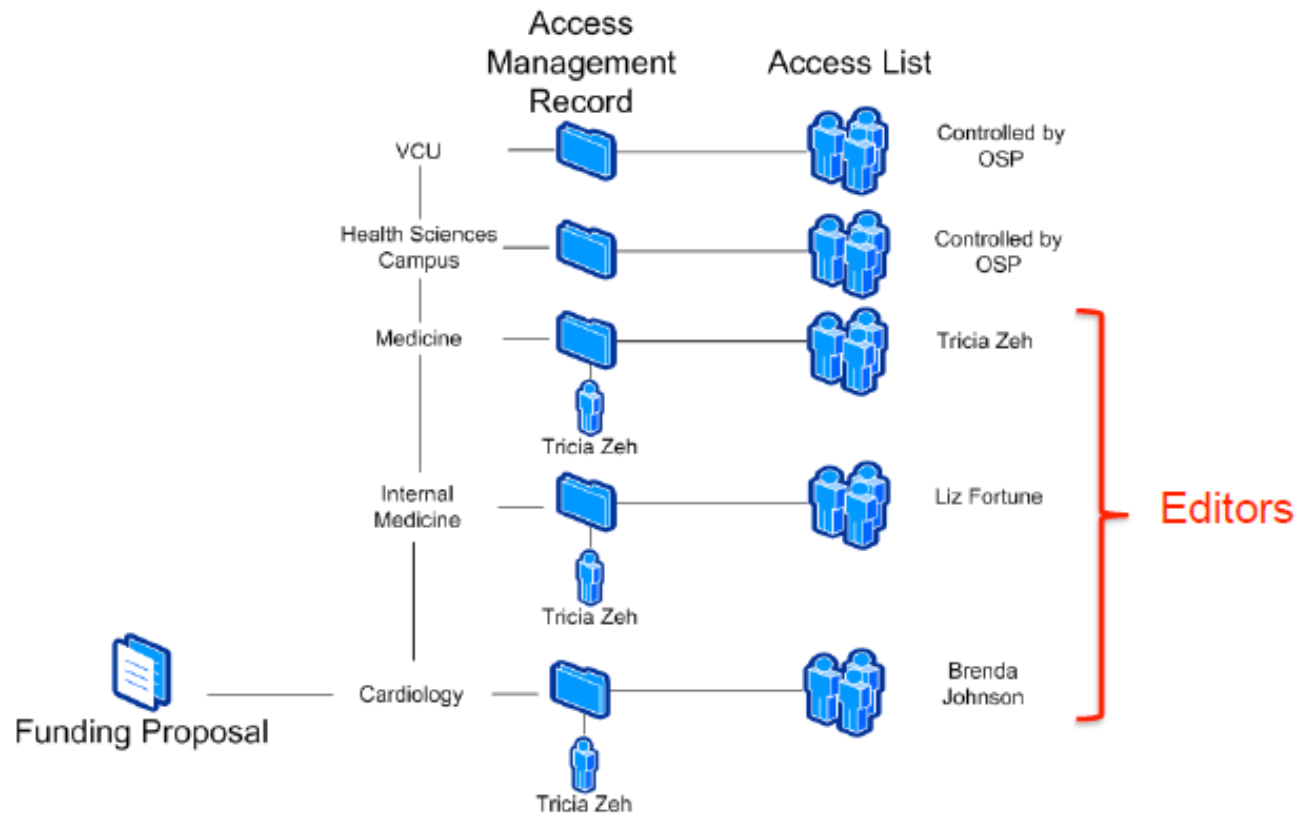
- Eliminates the paper
- Budgeting looks better than InfoEd
- Access to see what is in various stages of development/work-flow

RAMS-SPOT Org Structure

- Maintain existing ORG structure provided by HR (as best possible).
 - This is referring to where the HR “home” is of the persons budgeted.
- Create VPR Org Structure limited to the following five levels for Access Management (no exceptions)
 1. Organization [VCU/VPR]
 2. Executive [Health Science Campus]
 3. Senior [School of Medicine]
 4. Business [SOM Department / Center]
 5. Division [Division / Center]

RAMS-SPOT Org Structure

Example FP in Cardiology



RAMS-SPOT Org Structure

- VPR will be working with the Schools to determine org structure set-up for the Business & Division levels.
- This structure is not something that should change frequently
- I will be looking toward Banner Financial Org structure for SOM.
- Financially responsible department will still drive which department gets “credit” for the award.
- Departments with Divisions should be thinking about their structure. I will be reaching out to you.
- Will keep you updated as we learn more
- This will be on the agenda again in December!

Doctoral Student Health Insurance FAQs

- Students must coordinate/purchase their own coverage.
- Students must provide proof of insurance to Department administration.
- Departments will no longer purchase insurance on behalf of students.
- Departments will not reimburse students for health insurance through sponsored grants.

Stipends At-A-Glance

Type	NIH Stipend	SOM FY15 Increase - Continuing	NEW SOM VCU TOTAL - Continuing	SOM FY15 Increase - Incoming	NEW SOM VCU TOTAL - Incoming
Pre Doc		\$3,165	\$26,265	\$3,429	\$26,529
MD/PhD		\$3,165	\$28,265		
MD/PhD				\$3,429	\$25,529
Post - 0	\$42,000	No Change – SOM requires the NIH minimum of \$42,000			
Post - 1	\$43,680				
Post - 2	\$45,432				
Post - 3	\$47,244				
Post - 4	\$49,128				
Post - 5	\$51,096				
Post - 6	\$53,148				
Post – 7+	\$55,272				

Pre- Award Options

		Pre Award (New Submissions)	
		Ts/Fs	All Others*
PREDOCS & MD / PhD	Health Insurance	Arrangement for coverage will be the sole responsibility of the student so there will be no budget line item for health insurance in your proposal submissions	
	Tuition / Fees	NIH Limits Apply	VCU Board of Visitors 2014 - 2015 Budget - including Tuition Rates
	Stipends	NIH Stipend Levels (\$22,476)	Budget full SOM new stipend amount
POSTDOCS	Health Insurance	No Change to Procedures - Contact Postdoctoral Services in VPR's Office	
	Tuition / Fees	No Change	
	Stipends	NIH Stipend Levels for appropriate year	SOM \$42,000 at a minimum

* Unless the Program/Funding Announcement states otherwise

Post-Award Options

		Post Award (Current Active Awards)	
		Ts/Fs	All Others*
PREDOCS & MD / PhD	<i>Health Insurance</i>	Health Insurance budget allowance incorporated in the " Institutional Allowance " line item can be rebudgeted without NIH approval for other research activities - i.e. research supplies, travel to scientific meetings, books, equipment	Rebudget health insurance dollars to other project related expenses. Check the Terms & Conditions of each award to determine if prior approval is needed from the Sponsor. (Prior approval is not needed for most federal grants/co-op agreements since health insurance is not a separate cost category)
	<i>Tuition / Fees</i>	No Change	No Change
	<i>Stipends</i>	NIH Stipend Level Cap - \$22,476 Diffence of \$3,789 to be covered by Dpt - reimbursed by SOM	Budget full SOM new stipend amount
POSTDOCS	<i>Health Insurance</i>	No Change to Procedures - Contact Postdoctoral Services in VPR's Office	
	<i>Tuition / Fees</i>	No Change	
	<i>Stipends</i>	NIH Stipend Levels for appropriate year	SOM \$42,000 at a minimum

Guidance On BUDGETING For New Proposals

- Training Related Expenses and Institutional Allowances should still be requested on T and F mechanisms and used for costs other than health insurance
- Stipends budgeted for NIH T and F mechanisms must follow NRSA budgetary levels.
- Stipends budgeted for any other sponsored application that does not require NRSA budgetary levels to be followed must budget at minimum the full SOM Stipend level.

Salary Cap Cost Share Management

- All Faculty who have total Institutional Base Salary (IBS) over the salary cap in effect at the time of proposal and/or award must cost share the portion of their salary that is over the cap in proportion to the effort committed to the project.
 - Applies to all personnel over the cap, regardless of whether they are designated as key personnel
 - IBS is the total of VCU and MCVP contracted salary
 - VA appointments (1/8ths) are not part of VCU's IBS

Salary Cap Cost Share Management

At Proposal:

Calculating the Amount for Cost Share

- Link to SOM website: [NIH Salary Cap Calculator](#)

At Award:

- **Establishing Cost Share Accounts**
 - Verify the cost share account is set-up appropriately with the responsible department and linked to the appropriate Banner GrantID (use Banner screens FTIORGH and FTIFATA)
- **Charge Cost Share – Use the calculator again!**
 - The percentage to charge to the VCU PAF per pay period will be calculated for you for both the federal share and the cost share amount.

Salary Cap Cost Share Management

Monitor your cost share accounts....

In addition to monthly monitoring, cost share allocations to VCU payroll should be reviewed anytime:

- A new budget period begins
- Salary Cap changes (currently Executive Level II)
- Total IBS changes (a raise or decrease)
- Distribution between MCVP/VCU salary changes (shift in salary between entities)

Salary Cap Cost Share Management

Proactively Manage Effort Reporting -

To ensure effort reporting *Computed Effort* is as accurate as possible **administrators** must:

- Make sure cost share accounts are linked to the grant.
- This ensures that payroll charged to the sponsor and the cost share account is summed to reach a total *Computed Effort*.

But ensuring correct effort does not stop there!

- Investigators will certify their total effort on a project.
- Administrators must make sure the *distribution* of salary for how that effort is funded is in compliance with the cap.

If the distribution is wrong and we charge the Federal grant salary above the cap we are out of compliance.

Salary Cap Cost Share Management

- Use the RA Dashboard to aid you in monitoring your cost share accounts and ensuring compliance.
- See the full presentation:
 - [NIH Salary Cap Management](#)
- Contact SOMRESADMIN@vcu.edu if you need further support
- SOM Research Administration is working to develop a monitoring program for NIH salary cap cost share compliance. Expected to be implemented in early 2015.

Other Topics

- **PI Eligibility**
 - Policy out for public comment
 - Essentially, if not Full-time faculty, an exception is needed (Form)
 - SOM working through how we will handle
- **PI & RA Dashboard – Department by department**
 - Discuss department specific operations
 - How to best leverage dashboard data
- **Updated Compliance Documentation Checklist (9-4-14)**
- **SOM Clinical Trial/Research – Department and Division Research Faculty Meetings**

Questions??



SOMPROPOSALS@vcu.edu

Proposal Submission Process

Pre-award questions

Proposal submission for SOM review

SOMRESADMIN@vcu.edu

All post award administration matters

Research Dashboard

SOMCT@vcu.edu

Clinical Research/Trial pre-study process

Clinical Research/Clinical Trial matters,
regardless of sponsor type:

Administration, operations, budgeting, billing compliance,
OnCore®

