



# RESEARCH ADMINISTRATION UPDATES AND ITEMS OF INTEREST

AUGUST  
2012

OFFICE OF THE VICE PRESIDENT FOR RESEARCH / OFFICE OF SPONSORED PROJECTS

*This newsletter is produced by the Office of Sponsored Projects to provide agency updates, sponsor policy and procedural information, and guidance and training in all aspects of sponsored project administration for Researchers and Research Administrators. Please visit <http://www.brown.edu/research/newsletters> for archives.*

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## OSP / OVPR UPDATES

### ➤ **Highlights from the Financial Conflict of Interest (FCOI) Requirements for Brown's PHS Funded Investigators Effective August 24, 2012**

PHS agencies include NIH, SAMHSA, OPHS, IHS, HRSA, FDA, CDC, and AHRQ

#### ○ **New COI annual assurance Form**

Prior to spending any funds under a Notice of Grant Awards (NGA) with an issue date of August 24<sup>th</sup> or later, all Brown Investigators\* on a project must complete the new COI annual assurance form(s). The form(s) are found at <http://coi.brown.edu> . (Brown Authentication Required).

\*The definition of an "Investigator" includes the Principal Investigator (PI) and any other person (regardless of title or position) that the PI identifies as independently **responsible for** the design, conduct, or reporting of the research.

#### ○ **Mandatory training**

All PHS-funded "Investigators" must also complete Brown's online training in [Traincaster](#) **prior to the expenditure of funds under a NGA issued on or after 8/24/12.** Training must be completed at least every four (4) years. No new account numbers or funding increments can be released until all Investigators have completed the training.

We encourage all PHS Investigators to take the training now to fulfill this mandatory requirement.

- **Disclosure of all externally-funded travel reimbursements**

PHS requires that “Investigators” report to the University the occurrence of any reimbursed travel or “sponsored” travel (i.e., that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available), related to institutional responsibilities *except* when travel is reimbursed by:

A federal, state, or local government agency; an institution of higher education as defined at 20 U.S.C. 1001(a); an academic teaching hospital; a medical center, or a research institution that is affiliated with an institution of higher education.

You must report sponsored or reimbursed travel prospectively or within 30 days of each trip. To report sponsored or reimbursed travel, please access and complete [this brief form](#).

- **FCOI information made accessible to the public**

To ensure public transparency of investigators' FCOI management plans, investigators who are determined to have an FCOI related to PHS-funded research, will have their FCOI posted on the Brown OVPR website. The posting will contain no less than the following information:

1. The name of Investigator(s);
2. The title and role of the Investigator(s) in the Research project;
3. The name of the entity giving rise to the Significant Financial Interest and FCOI;
4. The nature of the FCOI; and
5. The approximate dollar value of the FCOI.

➤ **New Form for Subawardees and Non-Brown Investigators under the new PHS/NIH FCOI Requirements**

As of August 24, prior to proposal submission to PHS/NIH, the University **must** obtain information from each proposed subrecipient and/or non-Brown Investigator about whether the subrecipient/Investigator (1) has their own (or will develop) PHS-compliant financial conflict of interest policy or (2) does not have a policy and will agree to be subject to Brown University's policy on financial conflict of interest. Consequently, to capture the required information, we have developed the *FCOI Form for Non-Brown Investigators*.

The **FCOI Form for Non-Brown Investigators** must be completed at proposal stage and included in the Coeus proposal record for each named non-Brown Investigator (uploaded in the **Narrative Section** of Coeus – under **Brown Specific Attachment** narrative type). The form can be found here: <http://www.brown.edu/research/about-brown-research/policies/fcoi-form-non-brown-university-investigators>.

For those following Brown's policy, the University must have documentation that all Investigators have completed the mandatory training and that all conflicts have been reported. Information related to FCOI will be requested from Subawardees on an annual basis throughout the life of the project.

➤ **New Guidelines for NIH Restricted Submissions**

The number of NIH opportunities that place a limit on the number of applications from each institution is increasing. At present, NIH does not have a standard way of identifying limited submission opportunities throughout its Centers and Institutes.

The Office of Research Opportunities in OVPR makes every effort to identify NIH limited submission competitions through key-word searches of announcements. Programs identified to be of high interest will be announced via an email from [Research\\_Opps@brown.edu](mailto:Research_Opps@brown.edu). The email will contain details of the competition and an internal deadline. Information will also be listed on the [Awards with Restricted Submissions](#) page on the OVPR website.

Programs of high interest include (but are not limited to) the following:

- NIH Centers of Biomedical Research Excellence (COBRE)
- NIH Director's Early Independence Awards
- NIH High End Instrumentation Grant Program

Other identified NIH limited submission opportunities will be compiled once a month on a spreadsheet and linked to the [Awards with Restricted Submissions](#) page, under the award listing "NIH - List of Other Open Opportunities."

It can not be guaranteed that this list will reflect all NIH limited submission opportunities. Investigators should also refer to the [The NIH Guide for Grants and Contracts](#) and read RFAs and PAs very closely to determine if there is a limit to the number of submissions from institutions. Interested applicants should contact **Margaret Manning, Research Opportunities Coordinator**, at [Research\\_Opps@brown.edu](mailto:Research_Opps@brown.edu) not less than 6 weeks prior to NIH deadline. The Vice President for Research will then determine if an internal competition is necessary. Please visit the [OVPR website](#) for information on the review process for internal competitions.

➤ **Free Upcoming Webinar ~ Research Arms Race: *The Current Health and Future Well-being of the American Research University***

On September 12, 2012, 1:00-2:00 p.m. EDT, the National Academies' Government-University-Industry Research Roundtable (GUIRR) will host a special **webinar** reviewing the impetus and findings of a report examining the challenges facing US research universities that claims the institutions are currently caught in an unsustainable and counterproductive "**research arms race.**"

Entitled *The Current Health and Future Well-being of the American Research University*, the report, produced by the Research Universities Futures Consortium, was a community driven effort. It was coordinated by Dr. Brad Fenwick with support from Elsevier, and involved 25 of the nation's top research universities. Dr. Fenwick and his team examined the ability of universities to compete in today's complex and rapidly changing R&D environment and explored how better information and cohesive strategies are needed to address the challenges effectively. During the webinar, Dr. Fenwick will provide an overview of the report and its findings, followed by Q&A with him and two Consortium representatives, Dr. Gregory Reed, University of Tennessee and Dr. Charles Louis, University of California, Riverside.

**Key Report Findings:**

It is clear US research institutions are not alone in facing pressures brought on by the current economic environment. But it is the combination and complexity of those pressures - including declining funding, erosion of endowments (gifts, often monetary), soaring tuition costs, research competition and increasing compliance and reporting requirements - that now challenge the academic research enterprise.

The report outlines six overarching findings that provide a framework for understanding the current conditions, and indicates that collaborative action is needed to address some of those key challenges.

Learn more and view the full report at [www.researchuniversitiesfutures.org](http://www.researchuniversitiesfutures.org).

There is **NO COST** to attend this webinar, but registration is required. A confirmation email will be issued prior to the event containing the webinar URL.

Requirements: Audio for this event will be streamed through your computer speakers. To participate, you will need a computer with internet access. You do not need a telephone or microphone. You will be able to type questions for the speakers during the Q&A session.

[Register Now](#)

## AGENCY UPDATES

### NIH UPDATES

#### ➤ **Notice of NIH Special Council Review of Research Applications from PDs/PIs with More than \$1.0 Million Direct Costs in Annual NIH Support**

##### [NOT-OD-12-140](#)

In September 2012, NIH will implement a general policy whereby Advisory Council members will provide additional consideration of new and renewal applications from well-supported PD(s)/PI(s) who currently receive \$1 million or more in direct costs of NIH funding to support Research Project Grants (RPG).

**Research Project Grants** for the purposes of this policy are generally investigator-initiated research projects rather than NIH's other grant programs, which include support for investigator training and development and center grants, e.g. R01.

In addition, grants which contribute to the threshold include: consortium/subaward costs, some cooperative agreements (example: U01) and subproject costs where an investigator is a sub-project leader on a Program Project Grant (P01) or other multi-project RPG award. Multi-PD/PI projects are also proportionally included in determining the \$1 million threshold for a specific PD/PI. Finally, competitive revisions are included in determining the threshold.

The following Research Project Grants will **not** require this Special Council Review:

- Applications submitted in response to Requests for Applications (RFA)
- P01s and other multi-project RPG applications **unless** all of the PD/PIs and sub-project leaders are at or above the \$1 million threshold.
- Multi-PD/PI projects **unless** all of the PD/PIs are at or above the \$1 million threshold.
- Subprojects within complex applications. This may be revisited by NIH once they begin to accept complex applications through eRA Commons.
- Administrative supplements.

NIH stresses that **this policy does not represent a cap on NIH funding.** NIH recognizes that some of the most productive investigators are leading significant research teams and programs that may require over \$1 million/year of NIH awards to be sustained. NIH also recognizes that some types of research, for example large complex clinical trials, may commonly trigger this review but may also be recommended for funding.

For more information on this policy, please refer to the NIH Notice:

<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-140.html>

#### ➤ **Clarification: Time Limit on NIH Resubmission Applications**

##### [NOT-OD-12-128](#)

NIH policy allows a thirty-seven month window for resubmissions (A1 applications) following the submission of a New, Renewal, or Revision application (A0 application). This notice provides clarification of the following two aspects of this policy:

- The initial submission date of a new, renewal, or revision application constitutes the starting point for the thirty-seven month policy.
- The time limit for resubmissions expires after thirty-seven months. After that point, NIH views a submission as a **new application**, regardless of whether an unsuccessful resubmission (A1) was submitted during the thirty-seven month time period.

## ➤ **Prior NIH Approval Requirements of Human Subjects in Active Awards**

[NOT-OD-12-129](#) & [NOT-OD-12-130](#)

Current NIH policy requires prior approval from the NIH awarding Institute/Center (IC) for a change in scope that involves a deviation from the **approved involvement of human subjects**.

- In general, any change in research procedures in an active award that would result in an increased risk to human subjects will require prior NIH approval before implementation. This would include the following:
  1. An addition or change to the study design/protocol that would result in the need to change the overall human subjects designation or clinical trial designation of the grant:
    - a. From non-human subjects research to human subjects research (exempt or non-exempt);
    - b. From exempt to non-exempt human subjects research; or
  2. New inclusion of subject populations that are covered by additional regulation protections (pregnant women, prisoners, children, etc.)
  3. Any changes of the study protocol that would result in an overall increase in risk level for subjects, including physical, psychological, financial, legal, or other risk.
  4. New information that comes to light after a study is underway which indicates a higher level of risk to participants than previously recognized for a study intervention, procedure, or pharmacological treatment.
- In addition, prior NIH approval is required for awards which were submitted with the intent to conduct human subjects research during the period of support, but for which definitive plans could not be described in the grant application. As noted in the [NIH Grants Policy Statement \(GPS\) 4.1.15](#), after award and prior to the involvement of human subjects, the grantee must submit to the NIH awarding Institute/Center (IC) for approval, a detailed human subjects section that follows the [NIH competing application instructions](#).

If prior approval is required, the request **must** be submitted in writing (e-mail acceptable) by the Authorized Organizational Representative (AOR) to the GMO of the funding IC **no later than 30 days before** the proposed change. For details of what should be included in the request, please refer to the [notice](#).

## ➤ **Research Performance Progress Report (RPPR) Resources & Training Webinar**

[NOT-OD-12-142](#)

Starting **October 19, 2012**, all grantee institutions will have access to the **NIH Research Performance Progress Report** (RPPR) for most Streamlined Non-competing Award Process (SNAP) and Fellowship awards.

RPPR is the new Federal-wide uniform format for interim reports. The RPPR is completed electronically through the NIH eRA Commons and will replace the PHS 2590, eSNAP, PHS 416-9 NRSA Fellowship reports. The use of the RPPR is not required at this time and grantees may continue to use eSNAP or paper submissions as appropriate. A full list of activity codes for which grantees may submit RPPRs can be found on the [NIH RPPR website](#).

NIH expects **to require** use of the RPPR for most SNAP awards and Fellowships in the **Spring of 2013**, and to pilot the RPPR for non-SNAP awards during calendar year 2013.

Resources can be located on the [NIH RPPR website](#).

A training Webinar will be held on Wednesday, Oct. 17, 2012 from 1:30 – 3:00pm. [Registration](#) is required.

## COEUS UPDATES

### UPDATED FCOI ITEMS IN COEUS

Brown's updated [Financial Conflict of Interest policy](#) went into effect on 8/24/12. In order to comply with the new requirements of the policy and streamline the process to identify additional investigators on proposals, various updates have been made to Coeus.

Here is what you should expect to see in Coeus:

- **New Questionnaires for all NIH & NSF proposals** (including those proposals where Brown is the subrecipient under a NIH / NSF prime).  
These Questionnaires will identify any additional investigators for COI purposes. See this document about the Questionnaires for details -  
[http://www.brown.edu/research/sites/brown.edu.research/files/uploads/New\\_NIH\\_NSF\\_Additional\\_Investigator\\_Questions\\_V2.pdf](http://www.brown.edu/research/sites/brown.edu.research/files/uploads/New_NIH_NSF_Additional_Investigator_Questions_V2.pdf)
  - NIH Additional Investigator(s)
  - NSF Additional Investigator(s)

To view or complete the Questionnaire in Coeus go to Edit > Questionnaire.

- **New set of Certification questions**
  - New Document - [Investigator Certification Question Updates](#)
  - The new certification questions are coded with A1 - A6 rather than P1 - P5.
  - There is an added question - A2 - *Do you have a significant financial interest related to your professional expertise or institutional responsibilities?*
- **Yes No Question 0B17 removed** - this question will no longer be asked on proposals.
  - The question is removed from ALL proposals, including previously submitted proposals. If you need to know how a previously submitted proposal was answered, please contact [Coeus\\_help@brown.edu](mailto:Coeus_help@brown.edu).
  - New [PI YNQ Worksheet](#)
- **Updated COEUS Certifications Forms** (see attached samples)
  - **Investigator Disclosures & Assurances** - this form is under the File > Print menu and should be used for all investigators that do not certify within Coeus.
    - *Please note - the signature section is now on page 3.*
  - **Investigator Certification** - this form is under Actions > Print Certifications and should be used only if the Investigator answers the questions in Coeus.

In addition, the Coeus User Guides for Premium and Lite have been updated with this information:

<http://www.brown.edu/research/coeusguides>

If you have questions about the new Financial Conflict of Interest policy and identifying who is required to complete certifications, please contact [Julianne Hanavan](#) at [\(401\) 863-7233](tel:401-863-7233).

## COEUS UPDATES

## COEUS TIP OF THE MONTH

## SUMMER SALARY BUG IN COEUS



When budgeting salary for Summer periods (i.e. Faculty Salary -Summer or Grad R/A Summer line items) the End Date field in the Person Budget Details window in the generated out years is incorrect.

The End Date in the out years defaults to the end date of the budget period rather than the end date of the summer period designated in Period 1.

This issue is impacting any summer line items that are in budgets with a *project start date between February 2012 and July 2012*.

**Personnel Budget Details**

Cost Elm.: A031090 a) Faculty Salary - Summer Start Date : 01-Apr-2013 End Date : 31-Mar-2014

Desc.:

Cost: \$10,774.40 Underrecovery: \$0.00 Cost Share: \$0.00 Quantity: 1.00

Name	Job Code	Start Date	End Date	Period	% Charged	% Effort	Salary
Szulc, Katarzyna	X	01-Jun-2013	31-Mar-2014	Summer	100.00	100.00	\$10,774.40

Buttons: OK, Cancel, Add, Delete, Details, Calculate, Persons

*The End Date should be 08/31/2013*

Please check the proposal budget out years and make sure that the **End Date** is reflected correctly for your summer line items.

## COEUS USER GROUP

The meeting is intended to allow Coeus Users to network, share best practices, learn new business process changes, and address Coeus issues. **If you have ideas for topics to discuss please email [Kat Szulc](mailto:Kat.Szulc@coeus.org).**

Next Meeting:  
**September 26<sup>th</sup> – Salomon Rm 003**  
**10:00am – 11:30am**

## TRAINING

### OSP TRAINING SPOTLIGHT

#### Sponsored Projects Trainings Fall Schedule for September & October

To register for classes, please navigate to [www.brown.edu/learningpoint](http://www.brown.edu/learningpoint) and log in using your Brown User Name and Password.

~ The training classes can be found by clicking on the "Sponsored Research Related Training" from your homepage.

Date	Class
09/06/2012	COEUS : Viewing Proposal and Award Information
09/14/2012	Pre Award: Cost Sharing on Sponsored Projects
09/14/2012	Coeus : Proposal Creation and Finalization
09/18/2012	Coeus : Budgeting Basics
09/18/2012	Post Award - Commitments
09/19/2012	Post Award- XTrain
09/20/2012	Post Award- Allocations of Costs
09/24/2012	Post Award - Financial Closeout of Sponsored Projects
09/25/2012	Post Award- Cost Transfers
09/28/2012	Pre Award: NIH Assorted Training - Career Development Awards (CDA) ("K" Awards)
10/02/2012	Post Award - Effort Reporting
10/03/2012	Post Award – Direct Charging Administrative Costs
10/04/2012	Coeus : Proposal Creation and Finalization
10/04/2012	Post Award - Supporting Documentation and Justification
10/9/2012	Pre Award: Reading the Funding Opportunity Announcement (FOA)
10/12/12	Coeus : Proposal Hierarchy
10/18/2012	Post Award - Traveling on Sponsored Funds
10/23/2012	COEUS : How does COEUS populate your Grants.gov forms?
10/23/2012	Pre Award: Introduction to Grant Budgets
10/23/2012	Post Award - Financial Closeout of Sponsored Projects
10/24/2012	Pre Award: NIH Assorted Training - Career Development Awards (CDA) ("K" Awards)
10/25/2012	Post Award – Commitments
10/26/2012	Coeus : Lite Proposal Development-New Users
10/26/2012	Pre Award: Cost Sharing on Sponsored Projects

### ABOUT OSP TRAINING

The Office of Sponsored Projects is pleased to offer numerous training opportunities for faculty and staff. Topics Include:

- **Coeus Training**
  - Learn how to use the University's sponsored projects management system.
- **Pre-Award Training**
  - Learn best practices in Pre-Award management. Sessions range from preparation of proposals and budgets to negotiation of award terms & conditions.
- **Post-Award Training**
  - Learn best practices in Post-Award management. Sessions ranging from travel on sponsored projects to allocation of costs.

OSP Training Sessions are now on [LearningPoint](http://LearningPoint), Brown's new Professional Development System.

~ To register for classes, please navigate to [www.brown.edu/learningpoint](http://www.brown.edu/learningpoint) and log in using your Brown User Name and Password.

~ The training classes can be found by clicking on the "Sponsored Research Related Training" from your homepage.

**Annual Research Administration & Compliance  
Certificate Training Program**  
September 2012 – June 2013  
**Kick off Date: September 25th**

#### GRANT CONFERENCES/NCURA EDUCATIONAL PROGRAMS

- **NCURA - 54<sup>th</sup> Annual Meeting**  
*November 4-7, 2012*  
Washington, DC  
For more information and to register please visit:  
<http://collaborate.ncura.edu/Annual54/Home/>

Questions or comments about the Newsletter should be directed to the editors:  
Jeremy Cox, Grant/Contract Accountant & eRA Administrator ([Jeremy\\_Cox@brown.edu](mailto:Jeremy_Cox@brown.edu)) or  
Katarzyna Szulc, Senior Contract & eRA Administrator ([katarzyna\\_szulc@brown.edu](mailto:katarzyna_szulc@brown.edu))