Greetings from SPA/OSP/CGA!

Recently celebrating the 2\textsuperscript{nd} Annual National Research Administrator Day, I was reminded how appreciative I am for the exceptional efforts and enthusiasm of faculty, scholars, research administrators and other project personnel in pursuing Michigan State University’s research mission. With proposal submittal, award negotiation, and the various stages in financial and administrative management, the SPA/OSP/CGA* staff strive to demonstrate our commitment to the Sponsored Programs Administration mission: to facilitate and protect MSU’s research enterprise by working collaboratively to provide effective and efficient administration.

Please enjoy our third issue of the SPA Newsletter. You will find many good articles written by SPA/OSP/CGA staff on interesting, helpful topics. For instance, you can read about new resources and tools now available: 1) the debut of brief \textit{Account Explorer} Training Videos, which will provide an easy way to learn how to access project financial and administrative information, and 2) new checklists and reference information for international projects.

Other featured articles are: 1) the \textit{Top 10 Budget Areas that Can Trip You Up}; 2) a description of \textit{Fee-for-Service} accounts and how it might apply to work in your department or college; 3) the results of MSU’s response to the \textit{Federal Demonstration Partnership 2012 Faculty Workload Survey}, which showed that MSU faculty’s responses were in keeping with faculty responses at our peer institutions, and 4) \textit{Client Feedback} related to key SPA/OSP/CGA services. Thanks to the many that completed the surveys.

For comments related to the overall content of the newsletter, or suggestions for future content, please contact Jennifer Lafferty, stumpje1@osp.msu.edu or me, reighley@osp.msu.edu. Authors or contact information have been included in each article for topic-specific questions.

Twila Fisher Reighley, Assistant Vice President for Research and Graduate Studies

\*Sponsored Programs Administration (SPA)/Office of Sponsored Programs (OSP)/Contract and Grant Administration (CGA)
Federal Demonstration Partnership (FDP) 2012 Faculty Workload Survey by Twila Reighley & Katie Winkler, SPA

The Federal Demonstration Partnership (FDP; Phase VI) is a cooperative initiative among 10 federal agencies and 155 institutional recipients of federal funds. It is sponsored by the National Academies with a purpose of reducing administrative burdens associated with federal research grants and contracts. In early 2012, the FDP (at the time Phase V – 10 federal agencies and 119 institutional recipients of federal funds) conducted a survey of principal investigators (PIs) of federally-funded projects to determine the impact of federal regulations and requirements on the research process, the “Faculty Workload Survey.” The results were released in April 2014 and MSU’s institution specific results were provided in March 2016. The survey reports responses were obtained from 13,435 PIs (~25% response rate) with active federal grants during the 2010-11 academic year from 111 (non-federal) FDP member institutions. Respondent characteristics were remarkably similar across the two time periods.

MSU had 215 PIs respond and reported an average of 41.9% of their research time associated with federally-funded projects was taken up by administrative and related requirements. This was similar to the average of similarly categorized institutions (Very High Research Public University with Medical School, $350-$700 Million Annual R&D), reporting 42.3%.

The percentage of Research Time Lost can further be broken into categories of research time lost in proposal preparation, pre-award administration, post-award administration, and post-award reports. The table below shows MSU’s response and the mean response of the other reported institutions within the category.

<table>
<thead>
<tr>
<th>Institution</th>
<th>% Research Time Lost</th>
<th>% Proposal Preparation</th>
<th>% Pre-Award Admin</th>
<th>% Post-Award Admin</th>
<th>% Post-Award Reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mean</td>
<td>42%</td>
<td>15%</td>
<td>6%</td>
<td>14%</td>
<td>8%</td>
</tr>
<tr>
<td>MSU</td>
<td>42%</td>
<td>14%</td>
<td>6%</td>
<td>14%</td>
<td>8%</td>
</tr>
</tbody>
</table>

Time-consuming administrative requirements identified by the survey and associated with projects included proposal and report preparation, project finances, project personnel, effort reporting, and IRB/Human Subjects and IACUC/Animal Subjects compliance.

By and large, it is reported that MSU is in-line with the average of the Research Time Lost as well as the breakout categories among similar institutions in the survey. Since 2011, MSU has implemented systems to reduce the administrative burden from the existing requirements for extramurally-funded projects and yet during that time period, additional regulations and requirements have been added by the Federal government and other sponsors.

Details of the findings of the report can be found on the FDP website at [http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_087667.pdf](http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_087667.pdf).
Cost Share Policy What is Voluntary Uncommitted Cost Share?

by Patricia Hampton & Craig O'Neill, OSP

The Spring 2016 edition of the SPA newsletter included an article on cost share and explained how it affects proposals. This is a follow-up article providing more detail about the “voluntary uncommitted” category of cost sharing and how it should be handled when preparing your proposal.

Voluntary Uncommitted Cost Share:
- includes faculty effort and other direct costs that are over and above what is committed and budgeted
- distinguished from voluntary committed cost share because it is not quantified
- not a legal obligation
- not documented, tracked, or reported as it is not required by the sponsor
- should not be listed in the proposal since it is often not allowed by the sponsoring agency

Examples:
- An aggregated description in the proposal of voluntary uncommitted cost share resources that MSU and any collaborators will provide to the project if funded. The aggregate description is narrative in nature and must not include any quantifiable financial information. Usually this description is placed in the “facilities, equipment and other” area of the proposal.
- Upgrades funded by MSU to project equipment during the life of the project that are secondary to the project objectives.
- Account cost overruns

Red Flags:
The following terms suggest cost sharing is present. Avoid using these terms as they may imply voluntary uncommitted cost share:
- Sharing
- Matching
- In-Kind
- Donate
- Exclusive Use
- Volunteer
- Support at no cost
- Contribute

If you have any questions regarding this type of cost share or any other budget questions, please contact your Department Administrator or your OSP Proposal Team for further guidance.

Audit Corner by Dan Evon, CGA

This portion of the newsletter is focused on recent audit experiences at MSU or at other universities.

The “big” news on the national front is the Department of Justice (DOJ) settlement with Columbia University for $9.5M. The payback was caused by charging the on-campus F&A rate to projects that DOJ felt should have had the off-campus rate. While many of us are curious about the details, settlements with DOJ provide very little information.

The National Science Foundation (NSF) Office of Inspector General (OIG) is still the most active federal audit agency, with a number of “data-analytic” audits released. And unlike DOJ, details including university responses can be found at: https://www.nsf.gov/oig/reports/reviews.jsp. Although the actual disallowance can be a small portion of the questioned costs in the reports (for example, MSU’s NSF data-analytic audit initially questioned $941K, but resulted in zero disallowed costs), they often result in some payback to the government, and provide a picture of what auditors examine. The following NSF audit report summaries do not include questioned 2-month salary costs, as that issue has since been resolved by NSF’s policy office.

- Columbia—$426K questioned (~$205K disallowed): equipment purchased near the end date and/or never used to benefit the project (backup capacity), insufficient documentation of the benefit to the project, a lack of documentation for the allocation method used to charge an expense to various projects, unreasonable travel costs, meals, and excessive speaker fees.
- University of Washington—$179K questioned ($71K disallowed): equipment purchased near the end date, unsupported supplies, expenses outside the period of the project, and meals.
- Georgetown—$101K questioned: paying a subrecipient for work done after the subaward period of performance, delinquent payment for miscellaneous supplies (video equipment/rental car), and insufficient documentation of the benefit to the project.

See the NSF website or talk with your CGA contact for more information.
*NEW* Additional Information and Tools for International Projects Webpage  by Twila Reighley & Katie Winkler, SPA

New tools and resources for international sponsored awards are now available on our website. They were created with feedback and cooperation from the International Sponsored Awards Workgroup (ISAW) which was convened in January 2016 of campus and central representatives and a workgroup of SPA/OSP/CGA staff. We collected input from various sources - faculty and administrators both in person and via web surveys. Appreciation is given to the research administrators who participated in the focused conversations, the faculty who agreed to be interviewed and the faculty and research administrators who responded to the surveys. Their input helped direct the focus of the resources, tools, and processes for international sponsored awards. ISAW plans to continue developing resources and exploring best practices in Phase 2 in 2016-17.

The webpage provides a centralized repository of information related to international projects. It contains guidance and references in order to assist faculty and staff with international proposal preparation and project management for cost reimbursable projects. The PIs and their administrators should work closely with the applicable departments (OSP, CGA, Finance, Human Resources, Export Control, ISP, and others as appropriate) to develop an administratively comprehensive and manageable international project.

Some of the information and tools that are available are listed below. They should be used in combination with the other resources on our website throughout the lifecycle of the award.

- **International Budget Preparation Checklist**
- **Reference information** that corresponds with the International Budget Preparation Checklist. More information about common overseas allowances, detailed international travel considerations, and how to fill out an Employee Biographical Data (EBD) Sheet are just a few items that have been included in the reference information.
- **Common International Subrecipient Considerations** – pre-award, subaward, and post-award considerations are explained in detail.
- **Roles & Responsibilities Guidance for International Subaward Setup** – this includes steps involved with the setup of an international subaward and guidance for who would normally be responsible for each task.
- **International Insurance Requirements and Resources** - FAQ’s about the MSU Travelers Abroad Database and information on types of insurance coverage available for traveling internationally.
- **Subject Matter Expert list** for International Sponsored Awards

If you have any questions about ISAW or the webpage, please contact Katie Winkler (ashbau10@osp.msu.edu), Kristy Smith (smith@cga.msu.edu), or Twila Reighley (reighley@osp.msu.edu).

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Research Administration Project Update

Research Administration Project announcement from Dr. Hsu’s fall newsletter:

The first phase of the Research Administration System (Kuali Coeus or KC) went live August 15. This deployment provides MSU faculty and staff with view-only access to research proposal and award information. Early in calendar year 2017, the Project will conduct a pilot program, with select MSU investigators, to test full system functionality, including system-to-system proposal submission. Subsequently, in April 2017, the MSU research community will begin using the KC system’s proposal development and conflict of interest modules. Please visit the Research Administration Project’s webpage to view all updates regarding system deployment and educational opportunities.

Contact Information:
- Help Desk: 517-355-2000
- Email: kchelpdesk@msu.edu
If you are submitting a proposal to the National Institutes of Health (NIH), annual disclosures and conflicts of interest forms are important pieces of the puzzle to consider well before the deadline. MSU’s COI policy, in accordance with Federal regulations, helps to ensure investigators are able to perform their research without bias due to a financial conflict of interest.

Keep in mind that OSP cannot submit a proposal to NIH without the appropriate disclosures on file, so getting those disclosures completed early in the proposal process can be key to getting your proposal submitted on time.

You might be saying to yourself, "I never know if a COI disclosure is required!" It can be confusing to know when a disclosure is necessary, especially when MSU is collaborating with other institutions or individuals. Here are some common scenarios that may help you determine when you need to have a disclosure on file:

**I am an MSU faculty member. What do I need to do?**

⇒ As an MSU faculty member, you are required to complete an annual disclosure every year. To complete your annual disclosure, visit the [OSP website](http://osp.msu.edu). If the annual disclosure check box on the eTransmittal is checked, you do not need to do anything else.

**An MSU faculty member in a different department is consulting on my project. What do I need to do?**

⇒ The consulting MSU faculty member should be budgeted as a regular paid employee but can be named as a consultant in the proposal. The faculty member must be named on the transmittal, and the standard annual disclosure requirements for MSU faculty apply as described above.

**A post doc/student/technical staff is named in the proposal or in the budget justification. Does s/he need to complete an annual disclosure or a COI form?**

⇒ Will the person have a role of “investigator” on the eTransmittal?
   1. If YES, s/he will need to complete an annual disclosure. If s/he cannot access the annual disclosure portal, s/he will need to complete a COI form before submission.
   2. If NO, s/he will not need to complete an annual disclosure or COI form.

**My collaborator will receive a subaward. What does my collaborator need to do?**

⇒ When the subrecipient institution completes the [Subrecipient Commitment Form](http://osp.msu.edu), is the box indicating the organization has and enforces a compliant COI policy checked YES or NO?
   1. If YES, we do not need any additional COI disclosures on file.
   2. If NO, the institution does not have a COI policy and agrees to follow MSU’s policy, we will need a COI form for all Investigators/Key Persons at the subrecipient site.

**A non-MSU consultant will work on my project. Does s/he need to complete a COI form?**

⇒ Will the consultant be listed on the Senior Key Person page?
   1. If NO, then the consultant does not need to complete a COI form.
   2. If YES, will the consultant be paid on the project and/or have measurable effort?
      a. If YES, the consultant will need to complete a COI form.
      b. If NO, the consultant should be listed with an Other Significant Contributor role, and they do not need to complete a COI form.

**What about COI training? When do I need to complete that?**

⇒ COI training is not required at the time of proposal submission. However, if awarded, all key persons and project personnel with an “investigator” role on the eTransmittal will need to complete COI training before an account can be set up.

Still confused? Contact [OSP](http://osp.msu.edu) if you have any questions about gathering the necessary COIs for your proposal. We are happy to help!

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**Salary Budget Builder Export Issues**

If you are experiencing problems exporting budget information from the Salary Budget Builder (SBB) into Excel, it may be due to the version of Excel you are using. The steps to correct this are provided in a link on the Salary Budget Builder (image from SBB provided below).

Please contact the SPA Systems Group at systems@cga.msu.edu if you have additional questions.

**NOTICE:** If Excel is not displaying your Salary Budget Builder files, please follow the steps on this [webpage](http://osp.msu.edu).
Client Feedback Surveys  by Erin Schlicher, SPA

At SPA/OSP/CGA, we strive to provide excellent customer service in all stages of research administration, from proposal development to the final closeout of an award. As reported previously, client surveys were initiated to solicit feedback on our proposal, award, and post-award processes. In addition to the ratings responses, the surveys include an area for open ended comments to collect additional input. Management reviews the comments received and follows up as appropriate. They report that the feedback has been quite useful in helping to assess the level of client support and providing ideas and encouragement to improve services to the campus community.

Proposal Survey

From January 1, 2016 through September 30, 2016 we received a total of 763 unique survey responses from individuals who worked with OSP on a proposal submission. For these responses, 96% of the individuals either strongly agreed or agreed with the following four statements:
1. I was helped in a timely manner.
2. I was provided with useful/accurate information.
3. I was treated courteously.
4. I was satisfied with the interaction.

Individuals also provided 239 comments, 85% of which were positive. The remaining comments indicated areas for improvement or offered suggestions for improving OSP services.

Award Negotiation and Account Setup Survey

Between January 1, 2016 and August 15, 2016, we received 192 unique responses from participants interacting with personnel from the OSP and CGA on award negotiation and account setup activities. Overall, 89 percent of responses indicated satisfaction with the award negotiation and account setup processes.
Top 10 Budget Areas That Can Trip You Up
by Jennifer Sergeant & Sarah Furnish, OSP

10. Revised Budgets & Just In Time Requests
A request can come directly from the Sponsor or from OSP/CGA. Usually this is due to the award being different than what was originally submitted and/or additional documents are required by the Sponsor. Be mindful of the short turn-around time, especially if the budget change requires approvals.

9. International and Domestic Per Diem Rates
Per Diem rates are based on the overnight/destination location. This link gives you additional details for Domestic M&IE or Foreign Per Diem Rates. It’s best to ask for help early in the budgeting stage.

8. NIH Modular Budgets with Subs – Complicated F&A Calculations
Subaward F&A costs are not factored into the direct cost limit. Therefore, the Subaward F&A costs are requested in addition to the $250,000 limit. In other words, the total direct cost should equal the module amount plus the subcontractors F&A. More information here.

<table>
<thead>
<tr>
<th>G. Subcontracts</th>
<th>Amount</th>
<th>IDC Base</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subcontractor 1</td>
<td>70,000</td>
<td>25000</td>
<td>95,000</td>
</tr>
<tr>
<td>TDC</td>
<td>20,000</td>
<td></td>
<td>20,000</td>
</tr>
<tr>
<td>FAA</td>
<td>20,000</td>
<td></td>
<td>20,000</td>
</tr>
<tr>
<td>Total Other Direct Costs</td>
<td>143,000</td>
<td></td>
<td>143,000</td>
</tr>
</tbody>
</table>

| H. Budget Total |
|-----------------|----------------|
| Less Sub F&A    | (20,000)       |
| Total without Sub F&A | 97,750         |
| Modular Amount, year 1 | 156,000      |
| Add back in Sub F&A | 20,000        |
| Total Direct Cost | 176,000       |

<table>
<thead>
<tr>
<th>I. Modified Indirect Cost Base</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less: Equipment</td>
</tr>
<tr>
<td>Less: Subcontracts over $5K</td>
</tr>
<tr>
<td>Total Indirect Cost Base</td>
</tr>
<tr>
<td>Total Indirect Costs</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>J. Total Direct and Indirect Costs</th>
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</thead>
<tbody>
<tr>
<td>233,250</td>
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</tbody>
</table>

7. Participant Support Costs vs Incentive Payments
PSCs are items such as travel allowances and registration fees paid to or on behalf of participants/trainees (but not employees) in connection with conferences or training projects. Incentive payments are payments to volunteers who are participating in a grant-supported project in exchange for money. These costs are not considered Participant Support Costs, because they are not included as part of a workshop, conference or training.

*NEW* Training Videos on Accessing Account Information
SPA/OSP/CGA would like to announce the debut of our very first set of training videos! These videos were created to communicate the wealth of information that can be accessed by research faculty and administrators on project financial and administrative activity. Video training is intended to supplement classroom training and other educational opportunities offered through our offices.

These first 6 videos in our training library include an overview of the Account Explorer (AE) post-award tool on the SPA website, along with the following associated tabs within AE: Billing, Budget to Actual, Expense Summary, Mailings, and Spendable Balance. Kristy Smith, Contract and Grant Administration (CGA) Manager, navigates through the corresponding AE portions on the SPA website with audio instruction, while highlighting key points and important information.

Videos can be accessed as follows:
SPA Website - Resources/Training: https://osp.msu.edu/PL/Portal/Training.aspx
Kaltura MediaSpace: https://mediaspace.msu.edu/channel/Sponsored%2BPrograms%2BAdministration%2B%2528SPA%2529/53590111

The SPA Training Team will continue to work with OSP/CGA to expand our training video library with various topics, so stay tuned for future updates! If you have questions or comments related to the videos, please contact Shannon Lutz (lutzsha1@osp.msu.edu) or Jennifer Lafferty (stumpie1@osp.msu.edu).
Fee-for-Service by Andrew Cascaddan, CGA

Fee-for-Service activities in academic settings generally encompass service projects that include the following criteria:

⇒ An external client requested deliverable
⇒ Completed using known practical applications of standard procedures and established theories, methods, and standard experiments using special or unique MSU research capabilities.
⇒ Normally charge a set fee according to a published rate schedule routinely charged to all potential customers
⇒ Use off-the-shelf tools
⇒ Utilize established protocols

Fee-for-service work does not require original, creative, or scholarly analyses or non-standard interpretation of data sets by MSU faculty, staff or students engaged in the work.

How does this relate to you and how does it work?

If you currently have RG or departmental accounts (DS, DN, etc.) that support this type of activity, it may be more appropriate to account for some of them in a fee-for-service (DY) account, which have been created in MSU’s financial system specifically for these activities. Some units have begun converting to this type of account to better manage their activities. You may be contacted by the Office of Financial Analysis regarding this new account option.

One advantage of establishing DY accounts is the opportunity to create and utilize a Fee for Service Activity Officer (FSAO). A FSAO is a special designation given to a person or persons within an office that, when given approval by a FSAO approval letter, has authority to sign certain MSU Standard Agreements on an expedited basis. The FSAO has responsibility for assisting fee-for-service activities within a department, unit or college. Anticipated responsibilities include: assisting in account setup, operation, and compliance activities such as export control, coordinating billing rate review with the Office of Financial Analysis, and the execution of MSU Standard Agreements (within quantitative limits/authorization). See MBP section 315 I.C.2 (c, d, f, and g) and II B for more information.

If you believe that fee-for-service accounts are appropriate for your department or college and are interested in the possibility of establishing an FSAO, requesting a DY account, or other related questions, please contact a current FSAO, Business-CONNECT, Contract & Grant Administration (CGA) or Financial Analysis.

For more information on fee-for-service, please see MSU’s Manual of Business Procedures, section 315: http://ctlr.msu.edu/COMBP/mbp315EBS.aspx or https://cga.msu.edu/PL/Portal/DocumentViewer.aspx?cga=aQBkAD0ANAAyADcA

Contact Us

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SPA/OSP/CGA Listserv
https://www.osp.msu.edu/PL/
Portal/
DocumentViewer.aspx?
cga=aQBkAD0AMQA1ADUA

Important Links
♦ OSP Department Organization:
https://
www.osp.msu.edu/PL/
Portal/
DocumentViewer.aspx?
cga=aQBkAD0AMwA4A
DAA

♦ CGA Department Organization:
https://
www.osp.msu.edu/PL/
Portal/
DocumentViewer.aspx?
cga=aQBkAD0AMwA3A
DkA