HOT TOPICS IN RESEARCH ADMINISTRATION

April 7, 2021

https://www.purdue.edu/business/sps/Training/hottopics.html
Spring 2021 Session

- **General Session (10 minutes)**
  - Current Landscape in DC with Change in Administration

- **Internal Processes Related to Sponsored Programs (50 min)**
  - Post Award Changes (Susan Corwin)
  - Payroll Overpayment, Repayment and Effort Reporting (Matt Clawson)
  - P2P (Jason Dietz/Rob Wynkoop)
  - Training (Susie Geswein)
  - Proposal Budgeting Tool & Summer Salary (Jenny Siemens/Amanda Hamaker)
  - Internal Process Questions

- **Compliance Related Topics (60 min)**
  - After Action Reports (Susie Geswein)
  - Reporting and Disclosures/Foreign Influence (Amanda Hamaker/Ken Sandel)
  - Compliance Questions
GENERAL SESSION - CURRENT LANDSCAPE IN DC WITH THE CHANGE IN ADMINISTRATION

Hot Topics in Research Administration

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President Biden’s Top Priorities

- Address COVID-19 Pandemic
- Economic Recovery
- Infrastructure
- Advancing Racial Equity
- Climate Change/Clean Energy
- Return to Rule Making

Congress

- **Endless Frontier Act**
  - Dramatic Expansion of NSF to Boost US Technology (~$100 billion – 5 yrs.)
  - Name Change - National Science and Technology Foundation (NSTF)
  - Focus - AI, HPC, Semiconductors, Quantum, Energy, Biotech, Data Mngt., etc.

- **CHIPS Act**
  - Creating Helpful Incentives for Producing Semiconductors (CHIPS) for America Act
  - Bolster US Competitiveness with China in critical technology sectors
  - Array of semiconductor R&D initiatives
  - Short-term and long-term plan to protect semiconductor supply chain
Research Priorities

Innovation Focus

- Attempt to create new ARPAAs (Advanced Research Projects Agency) for Health (HARPA) and Climate (ARPA-C)
  - Similar to ARPA-E (Energy) or DARPA (Defense)
- Interest in energy innovation (climate incentives)
- Emphasis on vehicles – creating technology hubs
- Focus on Industries of the Future (competition with China)
  - Artificial Intelligence (AI)
  - Quantum
  - Wireless
  - Biotech

New Personnel

- Leadership for agencies (DOD, DOE, ED, USDA, NEH, NASA, NOAA, EPA)
- Continued leadership at NSF (Panch) and NIH (Collins)
- Interest in diversity
- New Committees/Panels being established
FY 2022 Appropriations

- COVID-19 Reconciliation Package - Passed and approved
- Biden Budget: Full details out in Early May
- Promised large increases in R&D
  - Discretionary budgets matter for R&D – Agency spending
- Appropriations in summer (spending bills)
- New Programs
  - HARPA, ARPA-C
  - Endless Frontier Act & CHIPS Act
  - Translation & Innovation at NSF: build new partnerships

Science Agency Budget Increases Since January 2017

Percent change from FY 2016 - FY 2021, nominal dollars
$12+ million in COVID and CARES related research projects funded

$88.9+ million in relief funding for higher education
  - Distributed through Higher Education Emergency Relief Funds (HEERF) and available through September 2023
    - Student Directed Funding ($34.2M)
    - Institutional Funds ($54.7M)

State and Local Aid - TBD

FEMA - TBD
INTERNAL PROCESSES – POST AWARD RESTRUCTURE

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Internal Processes

Post Award Restructure

What is changing?

The organization of the Post Award teams.

The teams will be organized so that the focus will now be on specific job functions/tasks instead of managing by sponsor ‘cradle to grave.’
Post Award Restructure - Why are we changing the structure?

- Workload balancing
- Need to improve quality of customer service
- Continuous Increase in workload
- Timeliness
- A change in the type of and/or demand for services provided
- Significant changes to the volume and **complexities** of the tasks
- Increased regulatory and compliance demanding greater depth of knowledge and attention to detail (e.g. Foreign Influence)
- Changing from a multi-skilled team to a team specialized in roles/tasks
- Structure requires change to accommodate changes in grants management (e.g. growth may require additional supervisory roles)
- Movement of functions or tasks or the introduction of new functions or tasks
- Increased risk of financial loss and reputational damage
- Additional demand or oversight requirements from the sponsoring agencies
Internal Processes

Post Award Restructure – Benefits of the Change

- Reduce/Eliminate competing priorities
- Improve quality and thoroughness of work
- Improve cash flow
- Provide timely service outcomes
- Support the growing number of awards
- Submit reports on a timely basis
- Eliminate backlog
- Ensure efficient use of resources and to deliver consistent practices and cost savings
- Provide exceptional customer service
- Improved confidence in abilities
- Increased accountability in the work
- Pride in their work knowing they are able to provide the needed focus on the task(s) of their role
- Consistency in functional processes
- Support the National Security efforts
- Improved oversight of data integrity
- Narrowing of the focus will increase knowledge and allow for a more in depth understanding of our systems and the impact to other units.
- Greater accountability for timeliness and accountability of tasks
- Funding Administrators will become subject matter experts of the functions.
Teams

- **Account Setup**
  - Account Setup
  - Subaward
- **Finance**
  - Billings & Collections
  - Letter of Credit & Sponsor Reporting
  - Closeout
- **Account Management**

Diagram:

- Director, Post Award
  - Suzanne Payne
- Senior Manager Award Setup
  - Madeline Foglesong
  - Daniel Robertson
  - Tod Presutti
  - Christy Millen
- Senior Manager Finance
  - Brandis Hosler
  - April Colegrove
- Senior Manager Award Setup
  - Kayla Fields
  - Laura Gordon
  - Lan Zhong
  - Theresa Weilbaker
- Closeout
  - Michelle Kerkhoff
  - Bobbie Jo Robertson
  - Rosemary Dennis
  - Julie Barry
- Assistant Director Account Management
  - Jason Spall
  - Dawn Hart
  - Wei Zhang
  - Michelle Mariga
  - Cori Mellady
  - Brett Sanders
INTERNAL PROCESSES - PAYROLL OVERPAYMENT, REPAYMENT & EFFORT REPORTING

Matt Clawson
Director of Financial Affairs - College of Agriculture
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(765) 494-8447
Payroll Overpayment, Repayment & Effort Reporting

- How do Overpayments affect Research?
- Why do we care about Overpayments?
- Metrics & Dashboards
- Pilot Processes
- Upcoming Training for Supervisors & BO Staff
How do Overpayments affect Research?

- Expectations of account management and research administration
  - Allowable salary and fringes are properly charged to SPS and federal appropriated funds
  - Account management should be done to monitor payroll charges to avoid

- What are the risks if overpayments are charged to these accounts
  - Audit risk
Why Do Overpayments Occur

- Overpayments occur for many reasons, most common reason
  - Late or lack of communication
  - Late changes to payroll information
  - Changes to approved and paid time

- The top four root causes of overpayments
  - Terminations- employee paid after termination date
  - Pay/Cul - Late changes
  - Time and Leaves- Changes to time and leaves after employee has been pay
  - Recurring Pay and Deductions- Late changes to recurring pay

- Additional Risks
  - A portion of overpayments do occur on Sponsored Program/ Federal Appropriated funds
Payroll Overpayment, Repayment & Effort Reporting

- Overpayments at Purdue
- Simple definition- An overpayment is any wages an employee (Staff, Faculty, Student) receives outside anticipated monthly/bi-weekly pay

- From January 2020 through March PP7

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### Metrics & Dashboards

**Why Do Overpayments Occur**

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Metrics & Dashboards

Metrics will be provided to Senior Leadership/Deans/Department Heads looking at key areas

• To include:
  • Number of overpayments and dollar amounts
  • Number of active employees by repayment methods
  • Number of overpayment forgiven include system generated overpayments
  • Number of unapproved timecards by area
  • Number of overpayments by root cause month of month
What happens if overpayments are identified on sponsored accounts or federal appropriated funds?

• Pilot being done with Science, AG, Education, Liberal Arts to find/reconcile and move all overpayments to a department account to clear

• This include both salary and fringe charges

• Further hands on training will be done with units on what is expected going forward
Upcoming Training for Supervisors & BO Staff

- Upcoming training will be announced soon for two sessions regarding overpayment processes
- Trainings will cover the identified root cause issues of overpayments
  - First training session will focus on time/leave approval
    - Education on the importance of approval bi-weekly time and leaves to avoid overpayments
    - Training will target supervisors, business office staff and payroll center staff.
  - Second training will focus on remaining root cause issues that are more behavioral and action based (ex. Late terminations)
    - Education on the importance timely notations of employment actions (ex. Pay/cut changes, recurring pay and add pay changes)
    - Training will target departmental staff (grad coordinator, etc. ), business office staff and payroll center staff.
INTERNAL PROCESSES – P2P IMPROVEMENT PROJECT

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GR/IR Cleanup Initiative

- Leadership Team: Whitney Beutel, Lisa Newman, Julie Smith
- Round 1 cleanup effort running through 3/31/21
- Baseline at 1/19/21 = 5,799 GRIR items > 30 days
- Progress as of 3/22/21 (5,799 → 2,715 = 53% decrease)
- Reassessing progress at 3/31/21 and set targets for 6/30/21
- Reduced GR/IR transactions contributes to improved sponsored account balances and financial projections
Amazon Business Pilot

- Convenient new option to purchase non-contracted items

- Guided buying drives customers to strategically sourced contracts while also allowing Purdue to take advantage of Amazon's wide product selection and competitive prices

- Successful Pilot with Engineering, Procurement (WL, PFW, PNW) and Libraries (PFW, PNW)

- Broader campus rollout in process during April

- Another option for sponsored research purchases while continuing to ensure low prices
Amazon Business Pilot

Through Purdue’s Amazon Business Account, designated Pcard users will have access to:

- Free 2-Day shipping on Prime-eligible items
- Access to millions of additional products, available only to Business customers
- 24/7 access to a specialized Amazon for Business Customer Service team
- Membership Fees will be funded by Procurement
- Automatic tax-exempt purchasing on items sold by Amazon.com and participating 3rd party sellers
- Guided Buying which will direct individuals to strategically sourced contracts and spend with diverse companies
Amazon Business Pilot

Procurement Centers are working to establish accounts and onboard users to their Amazon Business Account

- Payment Method- Pcard only

Procurement and Amazon hosted a Town Hall on March 31, 2021 from 1 PM – 2:30 PM to present an overview of the new Amazon program to Procurement Centers.

- Overview of the new Amazon program
- Amazon purchasing guidelines
- Best practices
- Account set-up
- Account management
- Reporting features

More information and Town Hall Recording available on Procurement Services page – https://www.purdue.edu/procurement/
Monitoring of Critical Supplies

- The procurement team continues to monitor the availability of safety and research supplies
  - Nitrile Gloves (for research purposes) released to Fisher storeroom in February to support item availability and price protection
  - Distribution of face shields continues
  - If assistance is needed, please reach out to Procurement Services: purchasingrequest@purdue.edu
INTERNAL PROCESSES - TRAINING

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Research Quality Assurance (RQA)
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Training

- Lifecycle of an Account Training Series is Underway
- Registration numbers so far are very good

<table>
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<th>Course</th>
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<tr>
<td>BLCA 200 – Cost Principles</td>
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<tr>
<td>BLCA 210 – Pre-Award</td>
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<td>BLCA 230 – Award Establishment</td>
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## Internal Processes

### BLCA Lifecycle of An Account Training Timeline

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<td>6/23/2021 9-11</td>
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Internal Processes

BLCA Lifecycle of An Account Training

- Training available from the Sponsored Program Services website
  - Select Training & Development at the bottom left
  - Select Lifecycle of an Account Training under For Business Office Staff
- All sessions are being recorded and offered as an online course after live sessions are complete
- Documentation also available from this site
# Lifecycle of an Account - Policy Training Program

Register for online session via the [Registration Link](#) below to view the most recent recorded version of the training.

<table>
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<tr>
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<th>Description</th>
<th>Duration</th>
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<tr>
<td>BLCA 200 Cost Principles for Educational Institutions</td>
<td>Introduces the Cost Accounting Standards, the objectives of the Uniform Guidance and various regulations. Attendees will learn the importance of documentation, definitions concerning &quot;allowable&quot; and unallowable&quot; costs and costing policies.</td>
<td>1:55:02</td>
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| BLCA 210 Pre-award Process: Idea to Award | Discusses the Pre-Award processes and focuses on these areas:  
• Proposal concepts and processes,  
• Facilities and Administration,  
• Financial Conflict of Interest Disclosures,  
• Budget,  
• Subcontracts,  
• Cost Sharing and Coeus Overview |          |                          |

**Recording available via online course. Register to view.**

**PDF Version of Documentation**
PROPOSAL BUDGETING TOOL & SUMMER SALARY

Hot Topics in Research Administration

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Jenny Siemers
Assistant Director, Pre-Award
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Proposal Budgeting Tool

Project Details

Scope: Develop and deploy a budget tool that will allow principal investigators to develop their own draft budgets or to receive a budget created by Pre-Award with which they will be able to make adjustments on their own.

Benefits:
- Allow for more accurate “back of the napkin” budgets
- Less back-and-forth between PIs and Pre-Award = TIME SAVINGS
- Could possibly replace Coeus budget eventually (in some cases)

Limitations (current version):
- Projects must start on the 1st of a month
- Not yet designed for NIH/USDA (future versions will accommodate these sponsors)
- Limits on number of staff/subawards budgeted
- Budgets cannot include cost share
- Current version is for 1 year only (multi-year coming soon)

Other Considerations:
- Use is completely OPTIONAL. Some PIs have been asking for this for years while others do not want it. It is not required.
Proposal Budgeting Tool

Pilot Phases

Phase 1: November 2020 - January 2021

• Initially invited a small group of investigators from COE in November
• Expanded to invite more COE investigators, as well as investigators from Ag, COS, and Polytechnic in January
• Volunteers were provided the tool and asked to provide feedback, new versions were provided as changes/enhancements were made

- Feedback will be gathered to evaluate:
  ○ Usability of the tool
  ○ Instructions/resources that may be needed to use the tool
  ○ Assess if the functionality meets the needs of the PI
  ○ Process flow (who initiates - PI or Pre-Award)
  ○ Accuracy of the calculations (through verification of budgets with Pre-Award)
Pilot Phases

**Phase 2: February 2021 — April 2021** April 2021 – June 2021
- Expand the tool for a project with a longer duration – 3-5 years is the current goal
- Invite more investigators to participate in testing/feedback, targeting unrepresented colleges/departments
- Increase usage and testing in Pre-Award

**Phase 3: April 2021 — May 2021** June 2021 – July 2021
- Create an NIH version of the Budget Tool
- Create a USDA version of the Budget Tool
- Consider adding options for Testing and Outreach F&A calculations (already done due to feedback received)

**Phase 4: June 2021** August 2021
- Provide a link to the spreadsheet and communicate availability to campus research community
### Personnel

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<td>$</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>0</td>
<td>Grad Student</td>
<td>0.0%</td>
<td>0.0%</td>
<td>None</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>0</td>
<td>Grad Student</td>
<td>0.0%</td>
<td>0.0%</td>
<td>None</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>0</td>
<td>Grad Student</td>
<td>0.0%</td>
<td>0.0%</td>
<td>None</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>TBD Undergrad</td>
<td>1 Students/yr</td>
<td>$0.00</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td>TBD Undergrad</td>
<td>1 Students/yr</td>
<td>$0.00</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td>TBD Undergrad</td>
<td>1 Students/yr</td>
<td>$0.00</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td></td>
</tr>
</tbody>
</table>

**Total Salaries and Wages**: $  
**Fringe Benefits**: $  
**Total Salaries, Wages and Fringe Benefits**: $
## Proposal Budgeting Tool

### Project Personnel

To assist with budgeting projects or postdocs, a table of rates is included on the 'Grad PostDoc Dept Pay Rates' tab.

**Provide Personnel Information in the Yellow Fields**

<table>
<thead>
<tr>
<th>Start Month</th>
<th>Date Year</th>
<th>Total Direct Cost Period 1</th>
<th>Total F&amp;A Period 1</th>
<th>Total Project Cost Period 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan</td>
<td>2021</td>
<td>$23,261.50</td>
<td>$12,733.83</td>
<td>$36,055.33</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Position Type</th>
<th>Name</th>
<th>Annual Salary</th>
<th>Paid Full Period?</th>
<th>Start Month</th>
<th>Months Paid Per 1</th>
<th>Total AY</th>
<th>Total Sum</th>
<th>Total Salary</th>
<th>Fringe Benefits</th>
<th>Total Cost to Project with F&amp;A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Faculty</td>
<td>John Purdue</td>
<td>YES</td>
<td>Jan</td>
<td></td>
<td>$100,000.00</td>
<td></td>
<td>$5,075.00</td>
<td>$13,162.16</td>
<td>$18,237.16</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$5,024.34</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$36,055.33</td>
</tr>
</tbody>
</table>

2. Position Type: Faculty, Name: , Salary: $ , Paid Full Period?: YES, Start Month: Jan, Months Paid Per 1: , Total AY: $ , Total Sum: $ , Total Salary: $ , Fringe Benefits: $ , Total Cost to Project with F&A: $ 

3. Position Type: Faculty, Name: , Salary: $ , Paid Full Period?: YES, Start Month: Jan, Months Paid Per 1: , Total AY: $ , Total Sum: $ , Total Salary: $ , Fringe Benefits: $ , Total Cost to Project with F&A: $ 

---

[Logo: Purdue University]
### Other Direct Costs

**Provide Other Direct Cost Information in the Yellow Fields**

<table>
<thead>
<tr>
<th>Project Type</th>
<th>RESEARCH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Direct Cost Period 1</td>
<td>$55,791.30</td>
</tr>
<tr>
<td>Total F&amp;A Period 1</td>
<td>$14,188.83</td>
</tr>
<tr>
<td>Total Project Cost Period 1</td>
<td>$47,930.33</td>
</tr>
</tbody>
</table>

#### Equipment - no overhead

<table>
<thead>
<tr>
<th>Item and Item over $5,000</th>
<th>Cost Per Item</th>
<th>Quantity</th>
<th>Total</th>
<th>Total Cost to Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large equipment</td>
<td>$8,000.00</td>
<td>1</td>
<td>$8,000.00</td>
<td>$8,000.00</td>
</tr>
</tbody>
</table>

#### Travel - Domestic

<table>
<thead>
<tr>
<th>Purpose of Trips</th>
<th>Cost Per Trip</th>
<th># of Trips</th>
<th>Total</th>
<th>Total Cost to Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conference</td>
<td>$2,500.00</td>
<td>1</td>
<td>$2,500.00</td>
<td>$3,875.00</td>
</tr>
</tbody>
</table>

#### Travel - Foreign

<table>
<thead>
<tr>
<th>Purpose of Trips</th>
<th>Cost Per Trip</th>
<th># of Trips</th>
<th>Total</th>
<th>Total Cost to Project</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$-</td>
<td>1</td>
<td>$-</td>
<td>$-</td>
</tr>
</tbody>
</table>
### Grad Student and Post Doc Rates by College and Department

Select your college and department to see the appointment type and recommended rates for each personnel category.

<table>
<thead>
<tr>
<th>College</th>
<th>Department</th>
<th>Graduate Student - as of 7/1/2020</th>
<th>Post Doc - as of 7/1/2020</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>AV or FY</td>
<td>Full Time (100%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Appr.</td>
<td>Minimum</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engineering</td>
<td>Engineering Administration</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Aerospace</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Chemical Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Civil Engineering MS</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Civil Engineering PhD</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Electrical &amp; Computer Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Electrical Education</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Industrial Engineering</td>
<td>FY or AV</td>
<td>$1,800.00</td>
</tr>
<tr>
<td>Engineering</td>
<td>Mechanical Engineering MS</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Mechanical Engineering PhD</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Materials Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Nuclear Engineering</td>
<td>FY or AV</td>
<td>$1,500.00</td>
</tr>
<tr>
<td>Engineering</td>
<td>Construction Engineering MS</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Construction Engineering PhD</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Life/Renewable Res Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Biomedical Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Engineering Projects in Community Schools</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Environmental and Ecological Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Engineering</td>
<td>Global Engineering</td>
<td>FY</td>
<td>NA</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Ag Economics MS</td>
<td>FY</td>
<td>$1,800.00</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Ag Economics PhD</td>
<td>FY</td>
<td>$2,070.00</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Ag &amp; Biological Engineering MS</td>
<td>FY</td>
<td>$1,900.33</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Ag &amp; Biological Engineering PhD</td>
<td>FY</td>
<td>$1,975.00</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Agronomy MS</td>
<td>FY</td>
<td>$1,821.00</td>
</tr>
<tr>
<td>Agriculture</td>
<td>Agronomy PhD</td>
<td>FY</td>
<td>$1,879.00</td>
</tr>
</tbody>
</table>

**Reminder: Inform Pre-Award when rates are updated.**
Revised Budgeting Guidelines

Reason for Change:

- Summer Salary policy now allows 13 weeks of pay in summer or 65 days

- Previous summer salary budgeting practice:
  - Assumed 12 weeks of pay or 60 days
  - Not entirely accurate as compared to summer pay calculator
  - Difficult to explain to sponsors/faculty
  - Does not match calculations in new Budget Tool Spreadsheet

- New summer salary budgeting practice:
  - Accounts for full 13 weeks of summer
  - Matches the summer pay calculator and the budget tool (when rounded)
  - Much more straightforward – 100% of July = 1 month summer
  - Developed to apply inflated (after July 1) salary days of summer first
## Revised Budgeting Guidelines

### Period: 2
01 Jan 2023 - 31 Dec 2023

<table>
<thead>
<tr>
<th>Personnel Category</th>
<th>Start Date</th>
<th>End Date</th>
<th>EB Rate</th>
<th>Vac Rate</th>
<th>Percentage Charged/ Effort</th>
<th>Fringe Benefits</th>
<th>Salaries &amp; Wages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Personnel</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>100.0 / 100.0</td>
<td>$4,854.25</td>
<td>$17,619.78</td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>0.0 / 100.0</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>0.0 / 65.22</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>65.22 / 65.22</td>
<td>$3,260.92</td>
<td>$11,836.37</td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>65.22 / 65.22</td>
<td>$2,854.60</td>
<td>$10,361.51</td>
</tr>
<tr>
<td>Personnel - Tenure/Tenure Track Faculty</td>
<td>07/01/23</td>
<td>07/31/23</td>
<td>27.55%</td>
<td></td>
<td>100.0 / 100.0</td>
<td>$3,233.93</td>
<td>$11,738.39</td>
</tr>
</tbody>
</table>

**Total Senior Personnel**

$14,203.70 | $51,556.05
Revised Budgeting Guidelines

Calculating Days Budgeted in Coeus:

• May, July, August (months with 31 days)
  • 23 Days X % budgeted

• June (month with 30 days)
  • 22 Days X % budgeted

• Previous Example:
  • Coeus has 7/1/2023 – 7/31/2023 at 65.22%
    • Calculate days as follows:
      • 23 Days X .6522 = 15 Days

• Percentage budgeted for May or August will never exceed 10 days
INTERNAL PROCESS QUESTIONS?
COMPLIANCE RELATED TOPICS – AFTER ACTION REPORTS

Susie Geswein
Lead Compliance Officer
Research Quality Assurance (RQA)
sgeswein@purdue.edu
(765) 494-1846
Compliance Related Topics

After Action Reports

- After Action Reports are created after each audit or external compliance review
- The purpose is to identify areas where possible weaknesses in current internal controls may exist, even if the reviewing agency doesn't find it, which creates a risk for the University
After Action Reports – Recent Findings

- Complex Cost Sharing and/or Program Income – SPS and Account Management/BO staff should meet to document plans up front when awarded new complex grants
- Individual Memberships should include cost analysis of why paying for membership benefits grant
- **Technology Fees** are normally indirect costs
  - Make sure budget justification or unlike circumstances are documented in the grant file
  - Be aware that original request forms and annual renewal forms may be required by auditors
- PARs not found
- Revised PARs
  - Be very cautious with these documents. Make sure explanations are clear.
After Action Reports – Recent Findings

- Faculty Signature Delegations
  - All grant accounts should have a signature delegation authority indicating who is authorized to spend on the grant
  - Delegations should be reviewed and updated regularly
  - This form and a more generic form can be found at: Account Management Guidelines on page 4
  - Watch for Best Practices in BLCA 250 – Signature Delegation

- Recharge Centers Not in iLabs
  - Use document header and line item text as back up – make sure its descriptive and accurate
  - Ensure rates are approved
  - Understand internal vs external customers and processes
  - Backup documentation should be detailed and appropriate
COMPLIANCE TOPIC
FOREIGN INFLUENCE: RISKS TO HIGHER EDUCATION

Hot Topics in Research Administration

Amanda Hamaker
Director, Pre-Award
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Ken L. Sandel
Senior Director, Sponsored Program Services
sandel@purdue.edu
(765) 494-1061 (office)
Conflict of Commitment

**Driver:** Increased federal focus on disclosure of financial/non-financial activities and conflicts of commitment

**Conflict of Commitment:** A situation in which an individual accepts or incurs conflicting obligations between or among multiple employers or other entities.

**Evaluation of COC**
- Benefits & Risks of External Activities
- Guardrails and Expectations
- Establish processes for COC and FCOI reporting

**Establish Guardrails & Expectations**
- Provide faculty with the flexibility to conduct outside activities but set boundaries and expectations
- Ensure transparency and accountability
- Establish that the primary commitment is to the home institution
- Protect intellectual property and resources from being diverted
- Safeguard Purdue’s reputation
- Adequate time devoted to learning, discovery and engagement
- Ensure sponsor obligations are met

**Risk**
- Dual loyalty
- Adverse effect on privacy and IP responsibilities
- Inappropriate foreign influence

**Benefit**
- Dissemination of knowledge
- Real world experiences
- Enhanced technology transfer
Foreign Influence

JCORE/NSTC Foundational Principles

The integrity of the research enterprise rests on foundational principles and values, which are also consistent with American values:

- **Openness and transparency** enable productive collaboration and help ensure appropriate disclosure of potential conflicts of interest and conflicts of commitment.
- **Accountability and honesty** help acknowledge errors and correct behaviors that can hamper progress.
- **Impartiality and objectivity** protect against improper influence and distortion of scientific knowledge.
- **Respect** helps create an environment where all can be heard and contribute.
- **Freedom of inquiry** allows individual curiosity to guide scientific discovery.
- **Reciprocity** ensures that scientists and institutions exchange materials, knowledge, data, access to facilities and natural sites, and training in a way that benefits all collaborating partners.
- **Merit-based competition** helps ensure a level playing field where the best ideas and innovations can advance.
Foreign Influence

JCORE/NSTC Definition of the Problem

- Unfortunately, the governments of some countries do not demonstrate a reciprocal dedication to these same principles and values. Over the past several years, some individuals and foreign governments have exhibited increasingly sophisticated efforts to exploit, influence, and undermine U.S. research activities and environments.

- Recent breaches of research integrity within America’s research enterprise include failures to disclose the following:
  - Funding (research subsidies, salaries, and personal payments)
  - Parallel laboratories
  - Employment, affiliations, and appointments (including leadership positions in foreign research organizations)
  - Conflicting financial interests (including investment in and even ownership of private companies specializing in the same work performed at individuals’ U.S. research organizations)

- Inappropriate or exploitive behaviors have included conducting undisclosed research for foreign governments or companies while being funded for that same research effort or time by U.S. agencies; diversion of intellectual property (IP) or other legal rights; and breaches of contract and confidentiality in or surreptitious gaming of the peer-review process.

- Many of these behaviors have been associated with undisclosed participation in certain foreign government-sponsored talent recruitment programs.
National Security Presidential Memorandum – 33 (NSPM-33) on Government Supported Research and Development National Security Policy

- The term “foreign government-sponsored talent recruitment program(s)” means an effort directly or indirectly organized, managed, or funded by a foreign government or institution to recruit science and technology professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position).

- Some foreign government-sponsored talent recruitment programs operate with the intent to import or otherwise acquire from abroad, sometimes through illicit means, proprietary technology or software, unpublished data and methods, and intellectual property to further the military modernization goals and/or economic goals of a foreign government.

- Many, but not all, programs aim to incentivize the targeted individual to relocate physically to the foreign state for the above purpose. Some programs allow for or encourage continued employment at United States research facilities or receipt of Federal research funds while concurrently working at and/or receiving compensation from a foreign institution, and some direct participants not to disclose their participation to United States entities.

- Compensation could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation;
Cautionary tales

- MIT Professor Arrested and Charged with Grant Fraud, DOJ, January 14, 2021
- University Researcher Pleads Guilty to Lying on Grant Applications to Develop Scientific Expertise for China, DOJ, November 12, 2020
- Moffitt Cancer Center shakeup: CEO and others resign over China ties, Tampa Bay Times, Dec. 20, 2019
- Department Of Justice Reaches $5.5 Million Settlement With Van Andel Research Institute To Resolve Allegations Of Undisclosed Chinese Grants To Two Researchers, DOJ, December 19, 2019
- UCSD Eye Doctor Resigns After Investigation into Ties with China, The Scientist, Aug. 23, 2019
- FBI Urges Universities To Monitor Some Chinese Students And Scholars In The U.S., NPR, June 28, 2019
- Emory ousts two Chinese American researchers after investigation into foreign ties, Science Magazine, May 23, 2019
- Major U.S. cancer center ousts ‘Asian’ researchers after NIH flags their foreign ties, Science Magazine, April 19, 2019
- China: The Risk to Academia, FBI, 2019
- “NIH Lauer letter”, undue foreign influence, August 20, 2018
Recent Federal Actions and Proposed Rules

- **Current and Pending, Bio-Sketches and Foreign Component Reporting:** Consistent with federal agency expectations, Purdue University requires that every disclosure to an external funding agency of an investigator’s active, pending, or previous sources of support for research and other sponsored activities be true, complete, and accurate to the best of the investigator’s knowledge.

- **Certification regarding Telecommunication Equipment:** Section 889 of the National Defense Authorization Act: Prohibition of certain telecommunications and video surveillance services or equipment: Representations and certifications are required that we will not provide to the government or utilize in the performance of a project certain telecommunications equipment or services produced by any of five named Chinese companies or their subsidiaries and affiliates.

- **Foreign Gift and Contract Reporting:** Section 117 of the Higher Education Act of 1965 (20 U.S.C. § 1011f) requires us to disclose and report statutorily defined gifts, contracts, and/or restricted and conditional gifts or contracts from or with a statutorily defined foreign source, to the U.S. Department of Education (Department).

- **Foreign National Restrictions:** Department of Energy made a change to DOE Order 142.3 that requires prior approval by DOE before a foreign national can participate in a DOE funded project.

- **IT Security Requirements:** Cybersecurity Maturity Model Certification (CMMC) has been published in the Federal Register and enhanced requirements will be incorporated into contracts and solicitations.
Purdue’s Guiding Principles

Transformed our processes for collecting information to ensure compliance with reporting obligations of foreign gifts and contracts to the Dept. of Education (Section 117)

Strong Culture of Research Integrity

Made modifications to the reportable outside activity forms, disclosure requirements and questions.

Modifying our Cybersecurity “WEBER” environment to comply with the new CMMC requirements.

PRF developed a policy on Foreign Influence to protect critical and sensitive technologies that are disclosed to PRF.

Strong Regulatory and Security Framework

Openness and Inclusion

Improved our communications and information provided to faculty and principal investigators on changes in expectations related to current and pending support and other support and reporting and disclosure responsibilities

Protection of Critical and Sensitive Technologies

Recent Purdue Actions

Enhanced our utilization and training for Visual Compliance to performs restricted party screenings to ensure that international collaborators are not prohibited from participation

Heightened focus and utilization of the Foreign National Flag in SAP

Reviewed and scanned our procurement databases, IT Networks, Servers and IT ecosystem for covered telecommunication purchases and equipment from restricted parties under the NDAA Section 889

4/6/2021
PRINCIPAL INVESTIGATOR REPORTING AND COMPLIANCE RESPONSIBILITIES

- OUTSIDE ACTIVITY
- CURRENT & PENDING
- BIO-SKETCHES
- FOREIGN COMPONENT
- OTHER SUPPORT
- COI/FCOI
Disclosures – Internal to Purdue (ROA)

Reporting and Compliance Responsibilities

Complete Reportable Outside Activity (ROA) Disclosures for each academic year (when changes occur)

- Disclose any form of funding (a foreign party paying for flights or local hotel stays is a form of compensation) – this can be examined for significant financial interests
- Declare visiting faculty/other faculty like appointment at a domestic or foreign entity: All scholarly outputs from that activity – whether journal articles or talks or teaching materials bear your Purdue affiliation regardless of whether the activity was undertaken in the summer or the Ay. Scholarly outputs that list a Purdue faculty’s appointments at institutions other than Purdue may be considered a conflict of commitment with Purdue should be reported.
- When carrying out outside activity for foreign entity be sure not to use USG funded equipment (computers) or grad students for that activity

Note: If activity is with a foreign entity on the State department restricted party screening list the activity is not permitted. If State department suggests precautions then we provide guidance on what the risks are.

Higher Risk
- Support (Research, Instruction, Engagement) from other entities *
- Collaborations and affiliations *
- All outside employment & appointments *
- Access to other entities facilities *
- Outside business ownership *
- Adjunct/Affiliate/Faculty Appointments *
- Participation in Foreign Talent Programs *
- Service with/without compensation/honoraria from non-US entities *

Lower Risk
- Editing or service on editorial boards for scholarly or professional publications, peer manuscripts or grant proposals for non-US entities *
- Participation in an outside business enterprise *
- Officer, Director, Trustee in an Association, Board or Foundation *
- Consulting *, Advisory Councils *, Volunteering *
- These may become higher risk if for foreign entity or foreign government.

Not Required to Report
- Editing or service on editorial boards for scholarly or professional publications, peer manuscripts or grant proposals for US entities
- Service without compensation, or with honoraria less than $1,000 for US entities
- Attending or presenting at professional events
- Publishing scholarly works

* May trigger Conflict of Interest and Financial Conflict of Interest Reporting

Link to: Disclosure Form
Reporting and Compliance Responsibilities

When submitting proposals and receiving awards remember that:

- NIH, NSF & Other Agencies – require that Current and Pending Support/Other Support and Biographies must include support from all sources (financial, equipment, research material, consulting, or other forms of compensation)

- NIH – Requires disclosure of foreign components (collaborations, facility use, financial support, extensive travel)

- NSF - Research Performance Progress Report (RPPR) – Added a question “Has there been a change in the active other support of the PI/PD(s) since the last reporting period?”

- Department of Energy (DOE) issued a directive in 2019, mandating that “federal and contractor personnel fully disclose and, as necessary, terminate affiliations with foreign government-supported talent recruitment programs”

- PIs should be transparent and disclose all such current and pending activities in their Current and Pending forms etc.

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Requirements and Methods vary by Agency

- Proposal being submitted
- Current Purdue University Funding Sponsored Programs
- Pending Purdue University Pending Proposals
- Other funding provided through internally funded awards
- Additional support/collaboration/affiliations from/with outside entities
  - All positions and affiliations, including volunteer positions, relevant to the application
  - Relevant appointments at foreign institutions - “guest,” “adjunct,” “honorary,” with or without salary support
  - The number of person-months devoted to projects, even if there is no salary support or direct personal payments to the scientist
  - Income, salary, consulting fees, and honoraria in support of an individual’s research endeavors
  - Participation in a foreign talent or similar-type programs
  - Ongoing and completed research projects
  - All resources and other support, both domestic and foreign, for ongoing research projects, including those at different institutions
  - In-kind contributions from domestic and foreign institutions or governments that support research activities
  - Performance of any significant part of an NIH project outside of the US, whether or not funds are expended
  - Post-doc, student, or visiting scholar supported by a foreign government or institution
  - Travel paid by a foreign institution or government over $5,000/yr.
  - Financial interests received from a foreign Institution of higher education or a foreign government
### Other Agency Guidance - SPS Resource Page

<table>
<thead>
<tr>
<th>GUIDANCE</th>
<th>NSF</th>
<th>DOE</th>
<th>DOD*</th>
<th>USDA</th>
<th>NASA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Required for the following:</td>
<td>Senior Personnel on the proposal</td>
<td>PD/PI and senior/key persons</td>
<td>PI and Key Personnel</td>
<td>PD/PI and other senior personnel</td>
<td>PIs and Co-PIs</td>
</tr>
<tr>
<td>Use of approved format or templates</td>
<td>NSF provided Fillable PDF or SciENcv</td>
<td>Provide a list include brief description of project's goals and list of specific aims. Identify where the proposed project overlaps with other existing and pending research projects. Clearly state if there is no overlap.</td>
<td>Template</td>
<td>Provide a list</td>
<td></td>
</tr>
<tr>
<td>Pending Support</td>
<td>Include: Information for the proposed project and for any proposals currently under consideration from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.</td>
<td>All sponsored activities, awards, and appointments, paid or unpaid; provided as a gift with terms or conditions or provided as a gift without terms or conditions; full-time, part-time, or voluntary; faculty, visiting, adjunct, or honorary; cash or in-kind; foreign or domestic; governmental or private-sector; directly supporting the individual's research or indirectly supporting the individual by supporting students, research staff, space, equipment, or other research expenses. All foreign government-sponsored talent recruitment programs must be identified in current and pending support.</td>
<td>Report all resources and other support for all individuals designated in an application as senior/key personnel—including for the PI and for other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation. Information must be provided about all current support for ongoing projects, irrespective of whether such support is provided through the applicant organization, through another domestic or foreign organization, or is directly provided to an individual who supports the senior/key personnel's research efforts.</td>
<td>Record information for pending projects, including this proposal.</td>
<td>Provide all pending projects and proposals (regardless of salary support) in which you are performing or will perform work</td>
</tr>
<tr>
<td>Current Support</td>
<td>Include: Information must be provided for ongoing projects, from whatever source, irrespective of whether such support is provided through the proposing organization or is provided directly to the individual.</td>
<td></td>
<td></td>
<td>Include: All current efforts to which they have committed a portion of their time whether or not paid</td>
<td>Provide all ongoing projects (regardless of salary support) in which you are performing or will perform work</td>
</tr>
<tr>
<td>In-Kind Contributions</td>
<td>Include: All resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value. All resources and other support, both domestic and foreign, for ongoing research projects, including those conducted at a different institution.Include: Office/laboratory space, equipment, supplies, employees, students. In-kind contributions not intended for use on the project/proposal being proposed also must be reported</td>
<td>Report all current projects and activities that involve senior/key personnel, even if the support received is only in-kind (e.g., office/laboratory space, equipment, supplies, employees). All research resources including, but not limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign &quot;talents&quot; or similar-type program, or other foreign or domestic support must be reported.</td>
<td>Provide analogous information for all proposed work which is being considered by other possible sponsors</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Previous/Prior Support</td>
<td>N/A in Current &amp; Pending documentation – Prior NSF</td>
<td>N/A</td>
<td>All previous awards ending in the past 5 yrs.</td>
<td>N/A</td>
<td>N/A</td>
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</tbody>
</table>
## Proposal Stage Disclosures - Method (Where)

### Pending Proposals/Current Projects

<table>
<thead>
<tr>
<th>GUIDANCE</th>
<th>NSF</th>
<th>NIH</th>
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<th>DOD*</th>
<th>USDA</th>
<th>NASA</th>
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</thead>
<tbody>
<tr>
<td>Information for &quot;This&quot; Proposal</td>
<td>C&amp;P</td>
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<td>C&amp;P</td>
<td>C&amp;P</td>
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<tr>
<td>Ongoing projects and proposals currently under consideration from</td>
<td>C&amp;P</td>
<td>Other Support (JIT)</td>
<td>C&amp;P</td>
<td>C&amp;P</td>
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<td>C&amp;P</td>
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<tr>
<td>whatever source, irrespective of whether such support is provided</td>
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<td>through the proposing organization or is provided directly to the</td>
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<td>individual</td>
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</table>

### Previous Awards

- All previous awards ending in the past 5 years
  - Bio (opt: past 3 yrs)

### Other Resources/In-Kind

- All resources made available to an individual in support of and/or related to all of his/her research efforts, regardless of whether or not they have monetary value

- All resources and other support, both domestic and foreign, for ongoing research projects, including those conducted at a different institution. Include: Office/laboratory space, equipment, supplies, employees, students.

- In-kind contributions with a time commitment **not** intended for use on the project/proposal being proposed

- In-kind contributions with a time commitment intended for use on the project/proposal being proposed

- All foreign government-sponsored talent recruitment programs

### Appointments

- Positions and scientific appointments, both domestic and foreign, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).
Reporting and Compliance Responsibilities

- **Other Disclosures**
  - Promptly disclose intellectual property to the University through OTC
  - Disclose to the University Development Office any gift solicitation with foreign organizations
  - Disclose financial interests related to your research in all public sharing of research results including journal articles, presentations, and other publications

- **Compliance**
  - Comply with U.S. export control regulations
  - Comply with the Foreign Corrupt Practices Act
  - Follow the guidelines for travel to high-risk countries
Disclosure and Reporting Responsibilities

Summary of Reporting and Disclosure Responsibilities

Requirements: [https://www.purdue.edu/business/sps/data/disclosure.html](https://www.purdue.edu/business/sps/data/disclosure.html)


International Research Collaborations: [https://www.purdue.edu/business/sps/preaward/menu/2.proposalprepare/international_research_collaborations.html](https://www.purdue.edu/business/sps/preaward/menu/2.proposalprepare/international_research_collaborations.html)

Reportable Outside Activity (ROA)

Guidelines: [https://www.purdue.edu/ethics/resources/ROAformguidelines.php](https://www.purdue.edu/ethics/resources/ROAformguidelines.php)

FAQ - Conflict of Commitment and Reportable Outside Activity: [https://www.purdue.edu/ethics/resources/faps/coc-faps.php](https://www.purdue.edu/ethics/resources/faps/coc-faps.php)

Current and Pending Support (C&P) – Grant and Award Management

Purdue and Agency Guidance: [https://www.purdue.edu/business/sps/preaward/menu/2.proposalprepare/basic_elements/othersupport.html](https://www.purdue.edu/business/sps/preaward/menu/2.proposalprepare/basic_elements/othersupport.html)

Conflict of Interest (COI), Conflict of Commitment (COC) & Financial Conflict of Interest (FCOI)

Overview: [https://www.purdue.edu/research/regulatory-affairs/conflict-of-interest/](https://www.purdue.edu/research/regulatory-affairs/conflict-of-interest/)

Policy COI: [II.R.2 - University Policy Office - Purdue University](https://www.purdue.edu/ethics/policies ethics/policies/)

Policy COC: [II.R.1 - University Policy Office - Purdue University](https://www.purdue.edu/ethics/policies ethics/policies/)

Disclosure Decision Tree: Employee decision tree for disclosure of research related financial interests and entrepreneurship activities: Office of the Executive Vice President for Research and Partnerships (purdue.edu)

Intellectual Property

Policy: [I.A.1 - University Policy Office - Purdue University](https://www.purdue.edu/ethics/policies ethics/policies/)


Disclosure: [Planning a Public Disclosure or Sale - Office of Technology Commercialization - Purdue University (prf.org)](https://www.purdue.edu/ethics/policies ethics/policies/)


Export Control and Research Information Assurance

Guidance: [https://www.purdue.edu/research/regulatory-affairs/export-controls-and-research-information-assurance/](https://www.purdue.edu/research/regulatory-affairs/export-controls-and-research-information-assurance/)

International Travel

COMPLIANCE TOPIC QUESTIONS?
THANK YOU FOR ATTENDING HOT TOPICS IN RESEARCH ADMINISTRATION SPRING 2021