Hot Topics in Research Administration Program

Research Compliance at Purdue

November 8, 2013

Panel:
Randy Bryant
Mike Szczepanski
Tom Wright
RESEARCH QUALITY ASSURANCE

WHO WE ARE,

WHAT WE DO,
We are ....

A unit in the Office of the Vice President for Research

Specifically within the Research Integrity / Regulatory / QA area

Vice President for Research
Richard Buckius

- Research Development
- Research Integrity / Regulatory / Quality Assurance
- Discovery Park
- Industry Research & Technology Program
- Research Communications
We are on the web at

http://www.purdue.edu/research/vpr/

The Research Quality Assurance Unit (RQAU) reviews and monitors Purdue’s research administration and research regulatory compliance practices and provides leadership when conducting comprehensive reviews of the University’s compliance activities. The RQAU staff will coordinate education and training of Principal Investigators, project staff, and departmental and business office staff regarding compliance with federal and state regulation and Purdue policies relating to research.

The RQAU does not assume the duties of the operational regulatory or business areas, and all compliance and sponsored program support activities will exist in their respective reporting structures. The RQAU’s role is to monitor these efforts and assess University-wide performance.

RQAU services include:
- Financial Management Reviews
- Research Regulation Reviews
- Recommend improved procedures
- Development of best practice training material
- Provide training to researchers, research administrators, and business offices at Purdue
- Coordinate the response to audits
Services we provide

- Financial Management Reviews
- Research Regulation Reviews
- Recommend improvements to procedures
- Assist with implementation of recommendations
- Develop best practice training material
- Provide policy training, training materials, etc.
- Coordinate the response to audits
Financial Grant Mgmt Reviews

- Administrative & Clerical Expense
- Computer Purchases
- Cost Transfers
- Overload Pay on SPS accounts
- Vacation Payout
Research Regulatory Reviews

- Animal Exposure Occupational Health Program
- Central Animal Ordering Process
- Human Subjects – Post Approval Monitoring
- Technical Reporting Requirements
Liaison with auditors

- Project Closeout Audits
- Annual A-133 Audit
- Reviews during the life of the project
Who we interact with...

Research Integrity & Regulatory Affairs
Howie Zelaznik

Animal Care & Use (LAP)
Lisa Snider

Human Research Protection Program
Elizabeth Campbell

Research Regulatory Compliance
Cookie Bryant-Gawthrop
Who we interact with...

- **Sponsored Programs**
  - Mike Ludwig
- **Pre-Award**
  - Amanda Hamaker
- **Post-Award**
  - Jessica Lawrence
- **Ag Field Office**
  - Beth Siple
- **Tech & Admin Support**
  - Stephanie Willis
Who we interact with...

Faculty/PI's
Center Directors
Researchers

Research support
staff
Managing Director
Operations Mgrs

Business Office staff
Bus Mgr Liaison
Dept B.O. staff
DP Business Ofc
Purchasing
Costing

Others
Internal Audit
Outcomes

- Quick Reference Sheet (QRS)
- Quick Reference Card (QRC)
- Flow charts
- Responsibility Matrix
- Updated Procedures
- Data, Documentation to Auditors
Project Reviews

Administrative and Clerical Salaries
SUMMARY OF UNIVERSITY AUDITS, SETTLEMENTS AND INVESTIGATIONS RELATED TO FEDERAL PROGRAMS

National Science Foundation
Office of Inspector General
November 16, 2012

For Educational Purposes Only
Administrative & Clerical Salary Review

Where will we find federal regulations relating to A&C salaries charged to grants?
Administrative & Clerical Salary Review

Where will we find federal regulations relating to A&C salaries on grants?

**OMB A-21:** establishes principles for determining costs applicable to grants, contracts and other agreements with educational institutions
Administrative & Clerical Salary Review

Why are we concerned when we see A&C salaries on grants?
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OMB A-21 Section F.6.b (2)

The salaries of administrative and clerical staff should normally be treated as indirect costs...
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OMB A-21 Section F.6.b (2)

The salaries of administrative and clerical staff should normally be treated as indirect costs...

Direct charging of these costs may be appropriate where a major project or activity explicitly budgets for administrative or clerical services and individuals involved can be specifically identified with the project or activity.
Major Projects, as defined by A-21 Exhibit C, include:

• Large complex programs
• Projects involving extensive data accumulation
• Conference planning activities
• Project involving preparation and production of manuals, large reports, etc.
• Project geographically inaccessible to normal dept. administrative support
• Projects requiring project-specific database management
Unlike Circumstances

are associated with the consistent treatment of direct costs and F&A cost on sponsored projects.

F&A costs cannot be charged directly to sponsored projects unless “unlike circumstances” can be justified.
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Budget justification is critical in documenting “Unlike Circumstances”
Administrative & Clerical Salary Review

Analysis Method:

October 2011

All A&C postings on federal and state projects (incl. fed flowthru)

Each grant file was reviewed to determine if it met one or more of the review criteria:

• The Coeus budget listed the individual or the position
• Sponsor budget page listed the individual or the position
• Budget justification page provided justification for the position or person
• Determine if project met guidance regarding “Major Project”
Recommendation:

For each proposal with A&C salaries, Pre-award needs to ensure the item is budgeted on the sponsor's budget and fully justified to the sponsor in order to be charged to the project.

Project needs to meet the criteria for “unlike circumstances”