Pre- and Post-Award Task Force
Final Report
2014
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I. Executive Summary

The University of Illinois has been on the cutting edge of research and discovery for nearly 150 years. Faculty scholars and researchers at the university have created knowledge and developed technologies with the support of external funding. Over $800 million in research funding was awarded to the university in FY2013, demonstrating the quality of our faculty and the depth and breadth of their research efforts.

One of the challenges confronting the University of Illinois is the overall administration of its research portfolio. The administrative burden placed on research has grown as compliance requirements have become more complex and resource constraints have limited administrative support across the campuses. It is estimated that 42 percent of researchers’ time is currently spent on administrative tasks, compared with 18 percent two decades earlier.\(^1\)

President Easter tasked the Office of the Vice President for Research with the review of the research administration process and activities at the university, primarily focusing on pre- and post-award processes. The purpose of the review was to identify ways to streamline processes and increase standardization across campuses, with the intent to reduce the administrative burden on researchers and enhance the level of service provided to the research community.

A Task Force composed of faculty and staff was established on both the Chicago and Urbana campuses to:

- Identify regulatory constraints
- Evaluate research administration support infrastructure on the campuses
- Identify opportunities for the standardization of processes across campuses where appropriate and beneficial to the campuses
- Assess the adequacy of staff levels, classifications, and level of professionalism, and identify staff training opportunities where appropriate
- Review compliance protocols and identify ways to simplify implementation
- Identify process improvements to increase the efficiency and effectiveness of grant submission and administration within the constraints of federal and state regulations
- Assess propensity for risk in the current regulatory environment
- Assess best practices from peer institutions for adoption where appropriate
- Assess the impact of a new electronic system(s) on processes

The premise of this report is to provide an overview of the pre- and post-award research administration process on each campus, highlight challenges, and identify opportunities for improvement. More broadly, the issues highlighted relate to information technology, staffing, communication, and training. Successfully addressing these issues is not simply a matter of sourcing additional resources, although that is an important factor. A clear commitment from senior administrators at both the campus and university-level is essential.

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Although positive changes in the university’s research administration infrastructure have been made in recent years, there are still opportunities for improvements. Research faculty and research administration staff were interviewed and provided the following high-level suggestions that are broadly focused across the research enterprise:

**Information Technology**

The implementation of an integrated, electronic research administration system is critical for supporting streamlined business processes. The campuses are currently developing an electronic portal for distributing communications regarding research administration functions. The system will be developed in-house using components available through the Kuali Open Source Foundation. The project is a collaborative effort between the Vice Chancellors for Research and Administrative Information Technology Services (AITS).

- University leadership should establish institutional best practices prior to the implementation of an integrated, electronic research administration system. Standardization across and between campuses will help to eliminate redundant efforts and increase the efficiency of research administration staff.
- The electronic research administration system should facilitate the routing of contracts, research protocols, and other forms for review and approval, and streamline communication between reviewers, research administrative unit staff, and investigators. The system should automatically populate basic contract/protocol data into templates, as needed.
- The campuses should consider following a “Turbo Tax” model that has been designed to guide faculty step-by-step through proposal submission and other research administration processes.
- The campuses should consider developing a central proposal repository.
- An integrated electronic system that connects pre- and post-award functions should reduce duplicate data entry. The system should automatically exchange data with Banner.
- The portal should provide faculty and staff with easy access to grant information, and streamline the award billing process, simplify the review of expenditures, and facilitate financial reporting.
- An integrated, electronic research administration system should streamline effort reporting processes across the campuses and ensure consistency in the data collected.
- The Office of Grants & Contracts (GCO) should consider adopting a single, unified system that can accommodate minor variances in processes that reflect the unique requirements of each campus. The system should send investigators reminders for award closeout task deadlines.

**Staffing**

- Department and unit-level research administrative support varies significantly across the campuses. Campus leadership should evaluate staffing levels and consider aligning indirect cost funding with research support needs across all departments and units.
• Competitive salaries are necessary to attract and retain exemplary staff. The Vice Chancellors for Research and Office of Business & Financial Services (OBFS) leadership should take this into consideration when allocating funds to research administration units.

• The Vice Chancellors for Research should regularly evaluate research administrative unit staffing levels and adjust staffing based on evolving workloads.

• The Vice Chancellors for Research should view post-approval monitoring of Institutional Review Board (IRB) and Institutional Animal Care & Use Policy (IACUC) protocols as a priority and should provide additional resources as needed.

Communication

• Pre- and post-award responsibilities often cross organizational boundaries. The Office of Research Services (ORS), Office of Sponsored Programs & Research Administration (OSPRA), and Office of Grants & Contracts (GCO) should communicate regularly and work together to identify opportunities for the improved alignment of processes across the campuses and to ensure consistent research support and training from proposal submission to award closeout. University leadership must hold units accountable for process efficiency.

• University and campus leadership should work together to develop key performance metrics for research administration units. Metrics should align the university’s research goals with its business processes, and unit performance should be reported regularly and communicated to faculty and staff.

• The Vice Chancellors for Research and OBFS leadership should work with research administration units to clearly define roles and communicate responsibilities, policies, and deadlines to campus departments and units.

• The campuses should evaluate their respective method(s) of sponsored research communication to determine its effectiveness and ensure information is distributed to the appropriate faculty and staff.

• Research administration units should develop and document a communication strategy for sharing information with researchers and departmental business staff.

• Campus administration should assist GCO in efforts to communicate expenditure policies and procedures to investigators and departmental business staff.

• University leadership should articulate clear expectations to research administration units and promote a culture of shared responsibility for compliance activities.

Training

• Campus leadership should consider implementing formal training and certification programs for departmental business staff to improve department and unit-level research administrative support and enhance the quality of proposals submitted to pre- and post-award units for review.

• In order to create a more consistent approach to training across campuses, the Vice Chancellors for Research should work together to implement formal training programs
and resources for both experienced researchers and junior faculty (e.g., mandatory “PI school”).

- University leadership should provide additional resources for the development of an enterprise-wide, sponsored projects training program, as well as support the creation of dedicated positions responsible for oversight of training efforts. A university-wide training program should be part of larger research administration efforts.

- ORS/OSPRA should work with University Counsel to develop training for staff on export control and foreign entities.

- The Vice Chancellors for Research should consider providing additional resources to support training related to human subjects research, research safety, and conflict of interest.

- Campus leadership should consider establishing training goals for faculty and staff and incorporate goals into annual performance review metrics.

- GCO should consider implementing a staff “intern” program, a formal exchange between GCO and campus units as appropriate. This program would encourage high-level grants knowledge and skill development throughout the university system.

Detailed observations from faculty and staff on the various research administration functions included:

### Pre-Award Processes

#### Proposal Submission

- The Vice Chancellors for Research should address the timeliness of proposal submission and implement methods for improving compliance with internal deadlines to facilitate successful proposals. Late submissions negatively impact all researchers.

- Campus leadership should clearly define when approval of revised proposal materials is required.

- Campus leadership should consider eliminating the need for dean or department head signatures on all Proposal Approval Forms (PAFs)/Proposal Transmittal Forms (PTFs) (i.e., when the department or college is not committing matching funds or the proposal has been revised from an earlier, approved version).

- The campuses should consider hosting representatives from the National Institutes of Health (NIH), the National Science Foundation (NSF), or other major funding agencies to give seminars on what a competitive grant proposal looks like from the perspective of the sponsor.

- ORS/OSPRA should provide researchers and research support staff with an easily accessible “Most Common Errors in Grant Proposals” document to help them prepare more successful proposals.

- The Vice Chancellors for Research should evaluate proposal submission processes and consider implementing appropriate process improvements, including the creation of a dedicated grant support team and certification of departmental business staff with proven knowledge of proposal submission requirements.
Efforts to eliminate paper forms and automate processes should continue, including eliminating the use of paper forms and transmittal letters when the information is available electronically and enhancing web-portal capabilities, such as enabling electronic submissions and fillable PDF forms if not already available.

Campus leadership should work with ORS/OSPRA to define roles and responsibilities and identify which tasks should be handled at the department, unit, and college levels. In the case of Institutional Base Salary (IBS), the unit that is ultimately responsible for providing accurate salary data needs to be determined.

Contract Negotiation

- The final budget to which grant participants have agreed should be reviewed and approved by the investigator before the contract is executed.
- The Vice Chancellors for Research should consider allocating resources for additional contract negotiation staff in ORS/OSPRA and designating the authority to execute legal decisions (when warranted) to appropriate staff members.
- ORS/OSPRA should implement processes and/or systems to facilitate the sharing of information on contract status. If it is expected that faculty and staff should have the ability to check on a contract’s status in existing systems, the necessary training for UIeRA must be provided.
- ORS/OSPRA should implement a process or system to flag sponsors who do not agree with the university’s standard contract language. This would allow the impasse process to begin sooner, thereby reducing the overall amount of time it takes to reach successful contract execution.
- ORS should execute master agreements with sponsors when possible and work with campus leadership to facilitate University-Industry Demonstration Partnership (UIDP) participation.

Institutional Review Board (IRB)

- The Vice Chancellors for Research should view post-approval monitoring of IRB protocols as a priority and should provide additional resources as needed.
- The Vice Chancellors for Research should consider providing additional resources to support human subjects research training efforts. In order to create a more consistent approach to training across campuses, the Vice Chancellors for Research should work together to implement formal training programs.
- University leadership should establish a unified information security and privacy policy and work with the campuses to implement procedures to address security and privacy concerns.

Institutional Biosafety Committee (IBC)

- UIUC should consider establishing a BSL-3 facility.
- Campus leadership should consider ways to recognize the commitment of faculty reviewers.
• The Office of Animal Care & Institutional Biosafety (OACIB)/Division of Research Safety (DRS) should explore opportunities to partner with campus units to identify ways to promote a campus-wide safety culture.

• The campuses should consider ways to emphasize the importance of safety. Training across the safety spectrum (e.g., biological, chemical, radiation) that includes more than an overview of good laboratory practices is needed. The development of safety policies and an understanding of emerging regulations are important aspects of a comprehensive safety program.

Conflict of Interest
• In order to create a more consistent and streamlined approach to managing conflict of interest processes across campuses, the Vice Chancellors for Research should work together to evaluate policies and procedures.

• OVCR/Conflict of Interest (COI) staff should work with ORS/OSPRA to establish methods for sharing information on conflict of interest policies and training requirements throughout the proposal process.

Award Setup
• GCO should provide investigators with an award setup checklist that highlights their respective tasks and the timeline for completing them. Additionally, GCO should conduct an “entrance interview” with the investigator and unit staff to review the checklist.

• OBFS leadership should evaluate award setup processes and consider the implementation of appropriate process improvements.

Subcontracts
• ORS/OSPRA should execute master agreements with subcontractors when possible and should work with campus leadership to eliminate the dual review of contracts and budgets by separate staff members.

• ORS/OSPRA should consider assigning all components of a subcontract to one negotiator who reviews all contract aspects, including budget, in addition to conducting the negotiation with the sponsor or subrecipient.

• Campuses and University Administration should continue to focus on enhancing subrecipient monitoring to address faculty perceptions of insufficient quality of support.

• GCO should develop processes and systems to facilitate the departmental verification of invoices sent to subrecipients and reports submitted to the sponsor.

• Additional campus-level support is needed to continue subcontract administration after the subcontract is approved. Greater coordination at the time of award receipt will also prevent delays associated with initiating subcontracts.

• University leadership should determine who is ultimately responsible for the review and approval of subcontracts. Consolidating all aspects of the subcontract process under one unit would improve service by providing faculty and departmental business staff with one contact point with which they can interact.
• Establishing a more formal triage process that allows ORS/OSPRA staff to quickly escalate open issues would improve subcontract response times.

**Post-Award Processes**

**Award Administration**

• Faculty members need simple, clear guidance on how to access financial information for their grant accounts (i.e., Banner must become more user-friendly).

• While OBFS offers training in how to use Banner, it is not an efficient use of faculty time and distracts from their research efforts. Faculty noted that a monthly email notification on the status of grant accounts would be helpful.

• Regular meetings with a trained individual who provides one-on-one support could help to alleviate the grant administration burden on investigators and allow more time to be spent on research. It would also help to ensure compliance with grant expenditure requirements and reporting deadlines.

• Investigators should prepare a detailed budget narrative that explains how budgeted costs relate to the work proposed. Special requirements should be clarified and the investigator should thoroughly describe the basis of estimates or rates, specify equipment to be purchased, and justify restricted costs. This information will assist GCO in reviewing expenditures and prevent audit issues in the future.

• UIC and UIUC GCO staff need to work together to review and adjust processes across campuses to establish consistent standards and practices where possible.

**Billing and Financial Reporting**

• Faculty suggested mandatory training for new faculty in business/finance and HR policies impacting sponsored project administration.

**Effort Reporting**

• To facilitate accurate effort reporting, GCO should develop a post-award checklist that includes effort committed to a sponsored project. Researchers should sign the checklist in acknowledgement of effort reported at the time a grant is awarded and again before the award funds are distributed.

**Award Closeout**

• GCO should provide investigators with an award closeout checklist that highlights their respective tasks and the timeline for completing them. Additionally, GCO should conduct an “exit interview” with the investigator and unit staff to review the checklist and ensure that all of the necessary information has been documented and the award is ready for closeout.
II. Overarching Issues

The Task Force identified several issues that are not limited to a specific research administration function or process, but that relate more broadly to the institution as a whole. These overarching issues undermine research administration efforts, diminish operational performance, and negatively impact the level of support provided to researchers.

Staffing

Regulatory restrictions and policies inhibit the research conducted at a public research institution such as the University of Illinois because they limit the efficiency and responsiveness required for the research enterprise to compete successfully. Excessive regulations significantly impact the university’s ability to obtain external funding, recruit talent, develop the required administrative infrastructure, and compete with other research universities.

People represent one of the most important components of the research infrastructure. State or university regulations that hinder the university’s ability to recruit and retain talented researchers and staff limit our ability to compete. Inefficient hiring processes and ineffective human resources administration at the university can also jeopardize the research enterprise. For example, once a sponsor approves a research project, the award recipient must move quickly to assemble the necessary staff (e.g., lab technicians, research assistants and other administrative personnel) to support the project. Inefficiencies in the hiring process delay the progress of the research. Redundant processes and systems often result in a delay between the time when a new hire request is filed with the appropriate HR office and the time when the individual is hired and can begin work. State policies can exacerbate this problem.

As a result of a 2011-2012 review of human resource operations by the State Universities Civil Service System, more than 400 academic professional (AP) positions were converted to civil service positions. University positions are categorized as academic professional or civil service based on the duties and responsibilities of the position, as well as the knowledge, skills, and abilities required to perform job tasks, with academic professionals being required to have a Bachelor’s degree and specialized academic or technical expertise. Faculty and staff are concerned that civil service requirements may impact the ability of investigators to hire individuals with the necessary research expertise or force current employees into positions that are not appropriate fits for their skill sets. In addition to necessary skills and expertise, candidates must be a good fit for the fast-paced, challenging environment of the research administration units. Research support positions require a certain degree of flexibility to allow for the necessary cross-training across functional areas. The assignment of research support positions to civil service classifications also imposes hiring constraints such as salary limits, poor incentives, and employee termination restrictions. These hiring constraints undermine the university’s ability to recruit staff with the necessary skills and expertise to support research efforts, and ultimately inhibit the university’s ability to remain competitive for research achievement and funding.

Additionally, AP appointments have certain administrative advantages. They can be set up so that continued employment is contingent on the availability of funding. This is not feasible for civil service positions. If a civil service staff member’s salary is supported by grant funds and the grant ends, the department or unit must continue to cover the salary expense unless the
Chancellor approves the elimination of the position, which then requires relocation of the employee to another department or unit. However, if grant funds are no longer available to support an AP staff member, the position does not require high-level administrative approval for elimination, thus minimizing the cost burden on the department or unit. AP positions are also preferred because they are exempt from overtime. Significant workloads often require staff to devote extra hours prior to important deadlines.

Properly training research administration staff requires a significant amount of time. Some managers feel it can take a minimum of 3 years to effectively train staff to be proficient in grants and contracts-related policies and procedures. After they have completed training, staff members are highly valued, but they often find opportunities to transfer to college departments and units, which are sometimes perceived as more appealing due to higher salaries and a work environment that may be less stressful. Departing staff members create vacant positions that are difficult to fill, and once the position is filled, it takes years to get the new hire up to speed on processes. As such, there is rarely enough staff in a unit at any point in time with the necessary skills and expertise. High turnover rates force remaining staff to assume new responsibilities in addition to current workloads, which can decrease overall productivity.

**Competitive salaries are necessary to minimize the number of vacant positions and retain exemplary staff. The Vice Chancellors for Research and OBFS leadership should take this into consideration when allocating funds to research administration units.**

Administrative grant support provided at the college-, department-, or unit-level is inconsistent across the campuses and within colleges. Some departments and units have dedicated staff available to assist faculty with the grants process, from the preparation and submission of a proposal through the closing out of an award, while others provide little-to-no administrative grant support. For example, research institutes such as the Beckman Institute and the Institute for Genomic Biology on the Urbana campus, and research-intensive colleges such as the UIC School of Public Health and the UIUC College of Engineering, have significant levels of staff to support grant proposal submission and award administration processes.

Generally, departments and units attempt to provide faculty with appropriate levels of support, but there has been a general reduction in staffing across campuses as a result of the current fiscal climate. The lack of consistent administrative support for researchers can place increased demands on researchers, create unbalanced workloads on administrative units, and complicate the implementation of policies and procedures.

**Campus leadership should evaluate staffing levels and consider aligning indirect cost/sponsored research funding with research support needs across all departments and units.**

A common benchmark for determining staffing needs is to provide one full-time equivalent administrator dedicated to research administration for every $2 to $3 million in annual sponsored
expenditures. A range for acceptable staffing levels by college or department should be established and linked to the unique research portfolio of the unit. Relevant training and experience of staff should also be considered. An evaluation of research administrative support levels and staffing in colleges and departments can then provide information to guide campus resource allocation.

Allocating resources for dedicated research administration staff is difficult for a majority of departments/units in the current fiscal environment. Business managers in campus departments and units have a broad scope of responsibilities, and grants and contracts is a relatively small portion of their job duties. Many departmental business staff members only handle grants and contracts a few times a year. As such, it is difficult for staff to recall the appropriate policies and procedures and stay abreast of regulatory changes. High turnover of departmental business staff further complicates the research administration process. Ensuring that processes are well documented and that new business staff members are properly trained can help to minimize issues that arise due to inadequate knowledge transfer.

Efficiency gains can be realized by developing local administrative support for certain research processes, especially given the different project portfolios, agencies, grantors, and other funding agencies with which each unit interacts. Enhancing the local research administration infrastructure and implementing standardized practices can increase productivity and minimize compliance risk.

**Communication**

In connection with implementing processes to improve compliance and enhance proposal submission, campus leadership should identify a communication strategy for informing faculty and staff of the policies and internal procedures that correspond to these processes. Typically, policy and process changes or updates are communicated via email. However, email is not always the most effective or preferred method of communication. It is critical that a culture of accountability be instilled among campus researchers, business managers, department heads, deans, and others involved in the administration of sponsored research agreements.

The campuses should evaluate their respective method(s) of sponsored research communication to determine its effectiveness and ensure that the appropriate faculty and staff receive information.

Ineffective communication puts the university’s research portfolio at risk. For example, a new version of the NSF Proposal and Award Policies and Procedures Guide (NSF 13-1) was issued in December 2012. It included significant changes to merit review criteria, indirect cost coverage, and the cost sharing policy. Several proposals were submitted to NSF that did not incorporate the revised policies and procedures, and as a result, the proposals were rejected without review and were not eligible for resubmission. This might have been avoided if the changes to the NSF policies and procedures had been effectively communicated to the research community.

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Putting effort into identifying, sharing, and leveraging knowledge and best practices across units and departments can help research administrative support staff to meet researcher needs more effectively while streamlining processes. The UIC Office of Research Services (ORS), the UIUC Office of Sponsored Programs and Research Administration (OSPRA), and the Office of Grants and Contracts (GCO) on each campus are dedicated to improving the overall administration of research projects. Regardless of perceived differences in campus or unit cultures, all are working toward the same goal of providing superior customer service to faculty and their research-administrative staff members.

ORS, OSPRA, and GCO should communicate regularly and work together to identify opportunities for improved alignment of processes across the campuses and to ensure consistent research support from proposal submission to award closeout. University leadership must hold units accountable for process efficiency.

Strengthening the relationship and communication efforts between these key units will help to facilitate the implementation of processes in a manner that is sufficiently flexible to accommodate forthcoming federal compliance requirements, meet the distinctive needs of each campus, enhance operational efficiency and consistency across the campuses, and allow for the efficient tracking of research performance metrics. Additionally, regular meetings of pre-award and post-award staff to discuss open items that transcend units will increase the effectiveness of communication across research administration units. Note: The Urbana campus currently requires meetings between pre- and post-award directors and associate directors.

There is an apparent lack of partnership among faculty conducting research and research administrative staff. In order to bridge any faculty-staff “disconnects” that may exist, research administrators should try to communicate in a way that lets faculty know that they are supporting work toward a common goal.

University and campus leadership should work together to develop key performance metrics for research administration units. Metrics should align the university’s research goals with its business processes, and unit performance should be regularly communicated to faculty and staff.

Providing benchmarking data to the research community may help reduce barriers, as well as establish a sense of shared accountability. Collecting information on the following metrics and making this data widely available may help improve compliance with internal deadlines and requirements:

- Length of time prior to submission
- Length of time to review proposals or protocols
- Yield rate of proposal submission to award

Communication is a two-way process, however, and it is important that faculty make an effort to improve outreach and establish relationships across these administrative functions. The
relationship between the researcher and research administrative support staff is a key factor in determining the success of any research endeavor.

Training

Training and education programs are critical for ensuring that research administration staff is well equipped to support researchers, particularly in ensuring that staff is knowledgeable about federal regulations, which helps to minimize potential risk to the UI research portfolio. Proper training and education of researchers, department administrators, and university and campus administrators are equally as important.

The quality of service provided by research administrative support units is directly linked to the knowledge and expertise of unit staff. Researchers are often frustrated when they receive inconsistent responses and when research administrative support staff members are unable to adequately explain policies or procedures. Developing a staff “intern” program, a formal exchange of employees between research administration units and college or department business offices, is one way to encourage high-level skill development and knowledge sharing. It would also allow research administrative support unit staff and departmental business staff to appreciate the role of their counterparts, which will go a long way toward improving communication and service.

Campus leadership should consider implementing formal training and certification programs for departmental business staff.

Continued education programs are needed for current research administration staff and college- and unit-level employees involved in research administration. The continuing education aspect of an enterprise-wide training program is especially important for communicating new internal policies and procedures as well as changes to existing regulations and external sponsor trends, including requirements for funding. Training for current staff should also include classes on non-technical skills such as customer service, communication, leadership, and time management. Such skills are essential to the success of research administration staff and will allow for a more standardized approach to customer service and faculty support.

Ideally, campus pre-award staff, grants and contracts (post-award) staff, and staff from the compliance units (IRB, IACUC, IBC, COI) would meet with faculty to communicate sponsor expectations, discuss compliance issues that result from conducting sponsored research, and share best practices. While there does appear to be a range of training options on both campuses, the consistency and effectiveness of these various training programs vary.

In order to create a more consistent approach to training across campuses, the Vice Chancellors for Research should work together to implement formal training programs and resources for both experienced researchers and junior faculty.

Junior faculty members lack an awareness of research administration services. An effective training and education program is critical to their success. For example, when a new researcher
or junior investigator receives an award, staff from each of the aforementioned areas could meet with the investigator to walk through all of the components of the award, including budget categories, prior approvals, and institutional expectations of grant management. Grants and contracts staff could focus on the financial aspects of award management and compliance topics (e.g., effort reporting). Alternatively, a team of individuals could be trained in all areas of research administration, so that they have a good understanding and knowledge of each step in the process. These individuals could then initiate meetings with junior faculty to provide guidance and address any issues that may arise. Implementing such a program would promote visibility of research administration functions and establish trust between researchers and research administrators that could positively impact future projects.

Training efforts will allow for a consistent message to be projected to the research community. Support from University leadership will be an important component of the overall plan. Campus departments and units must require faculty and staff to participate in training for it to be effective and the requirements must be enforced. While training is currently provided to campus departments and units primarily on an ad hoc basis, the Vice Chancellors for Research are leading efforts to create a robust orientation program that includes the creation of a position that is dedicated to establishing training programs.

**Information Technology**

Information technology enables efficient business processes and can enhance the research administration function. In addition to streamlining the proposal submission process, an integrated, enterprise-wide electronic research administration system can resolve other issues that were acknowledged in the pre- and post-award review process, including:

- Ineffective data capture and sharing
- Lack of electronic routing
- Lack of transparency
- Duplicated manual data entry
- Lack of integration of UI systems (e.g., Banner, UIeRA)

A comprehensive, electronic research administration system would help with all aspects of research administration. A single system with an integrated dashboard that would provide researchers with a simple, easily accessible tool for reviewing information at a glance is ideal. Additionally, any new system should include a robust reporting tool to assist in the day-to-day management of sponsored projects and research administrative tasks.

**University leadership should establish institutional best practices prior to the implementation of an integrated electronic research administration system. Standardization across and between campuses will help to eliminate redundant efforts and increase the efficiency of research administration staff.**

Prior to the implementation of any new technology, it is critical that business processes are examined and opportunities to streamline procedures are considered. A new system can automate the routing of information and eliminate the need for manual data entry, but if it is to
facilitate the efficient execution of research administration functions across the university, it is important that processes are strengthened and consolidated as much as possible prior to automation. Establishing the appropriate business processes will provide a strong framework for effective research administration and support the implementation of a comprehensive system. Business processes can be scaled or customized to fit the unique needs of each campus without compromising the benefits of standardization.
III. Introduction and Methodology

The Pre- and Post-Award Task Force initiative was guided by an Executive Committee composed of leaders on the Chicago and Urbana campuses and in University Administration.

Executive Committee

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<tr>
<td>Michael Bass</td>
<td>Senior Associate Vice President for Business and Finance</td>
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<tr>
<td>Mitra Dutta</td>
<td>Vice Chancellor for Research, UIC</td>
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<tr>
<td>Peter Schiffer</td>
<td>Vice Chancellor for Research, UIUC</td>
</tr>
<tr>
<td>Lawrence Schook</td>
<td>Vice President for Research</td>
</tr>
<tr>
<td>Matthew Wheeler</td>
<td>Professor of Animal Sciences and Bioengineering Senator Executive Committee Member</td>
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The Executive Committee established a Task Force on each campus composed of both faculty and staff with experience in the research administration process to participate in the review on their respective campus. Staff members from the Office of the Vice President for Research were also assigned to each Task Force.

UIC Task Force

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<th>Name</th>
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<tr>
<td>Ahlam Al-Kodmany</td>
<td>Director of Financial Operations</td>
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<td>Institute for Health Research and Policy</td>
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<tr>
<td>Michael Anderson</td>
<td>Senior Researcher and eRA Coordinator</td>
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<td>Office of Research Services</td>
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<td>Brian Kay</td>
<td>Professor and Department Head</td>
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<td></td>
<td>Department of Biological Sciences</td>
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<td>Amneh Kiswani</td>
<td>Assistant Director, Pre-Award</td>
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<td>Office of Research Services</td>
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<td>Julie Kong</td>
<td>Associate Director of Research Services</td>
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<td>School of Public Health Administration</td>
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<td>Kristy Kuzmuk</td>
<td>Senior Director of Research Operations</td>
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<td>Mee Mee Lee-Choi</td>
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<tr>
<td>Richard Meisinger, Jr., Chair</td>
<td>Associate Vice President for Strategic Initiatives</td>
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<tr>
<td>Robin Mermelstein</td>
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<tr>
<td>Kenneth Moore</td>
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<td>Office of Research Services</td>
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UIUC Task Force

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<tr>
<th>Name</th>
<th>Position</th>
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<tr>
<td>Penny Broga</td>
<td>Associate Director for Business Affairs</td>
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<td></td>
<td>School of Integrative Biology</td>
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<tr>
<td>Roy Campbell</td>
<td>Professor of Computer Science</td>
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<td></td>
<td>Chair, Senate Executive Committee</td>
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<td>Lyndon Goodly</td>
<td>Associate Vice Chancellor for Research</td>
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<td></td>
<td>Director, Division of Animal Resources</td>
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<tr>
<td>Linda Gregory</td>
<td>Associate Director of Personnel &amp; Operations</td>
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<td></td>
<td>Office of Business and Financial Services</td>
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<td>Patricia Jones</td>
<td>Associate Director for Research</td>
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<td>Beckman Institute</td>
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<td>Kristy Kuzmuk</td>
<td>Senior Director of Research Operations</td>
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<td>Linda Learned</td>
<td>Associate Director</td>
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<td>Office of Sponsored Programs and Research Administration</td>
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<td>Richard Meisinger, Jr., Chair</td>
<td>Associate Vice President for Strategic Initiatives</td>
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<td>Matthew Wheeler</td>
<td>Professor of Animal Sciences and Bioengineering</td>
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<td>Senate Executive Committee Member</td>
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A. Project Design

The Task Force assessed the research administration units responsible for pre- and post-award processes according to the charge outlined by Vice President Schook (Appendix A). Task Force members met with staff from these units to discuss business processes and challenges. In order to better understand the research customer perspective, the Task Force interviewed business officers and associates from diverse units on each campus who regularly engage with the research administration units, as well as a small group of faculty with active research programs (Appendix B).

Pre-Award

The Task Force reviewed processes in the following functional areas, which were also evaluated by the Huron Consulting Group in 2011:

- Proposal Submission
- Contract Negotiation
- Institutional Animal Care and Use Committee (IACUC)
- Institutional Biosafety Committee (IBC)
- Institutional Review Board (IRB)
- Conflict of Interest
- Award Setup
- Subcontracts
**Post-Award**

OBFS leadership identified the following post-award functions for review by the Task Force:

- Award Administration
- Billing and Financial Reporting
- Data and Enterprise Systems (UIUC)
- Effort Reporting
- Award Closeout
- Compliance

In 2011, the University of Illinois engaged the Huron Consulting Group to conduct a comprehensive analysis of certain key research pre-award administration and compliance processes. The principal objective of the Huron analysis was to document business processes and provide recommendations for the technical specifications of a new electronic research administration system. Recognizing that Huron had made several recommendations for business process improvements that had been implemented, the Task Force began by updating the pre-award process flow diagrams that had been developed during the Huron engagement to reflect current practices (Appendix C). Note: Staff on the Chicago and Urbana campuses worked together to revise the Conflict of Interest flow charts in preparation for the new electronic disclosure application.

The scope of the current Task Force review extends beyond the Huron analysis and includes the evaluation of post-award functions. Leadership in the Office of Business and Financial Services (OBFS), the unit responsible for post-award administration, has provided process flow diagrams for post-award processes (Appendix D). The Task Force has also reviewed data (e.g., metrics, organizational charts, forms, and checklists) provided by both the pre- and post-award units involved.

**B. Project Objectives**

The following objective measures guided the Task Force in the review of each stage of pre- and post-award processes and in meeting with campus interest groups:

- Human resource issues that constrain the performance of grant recipients
- Procurement challenges that inhibit research
- Opportunities to streamline processes
- Compatibility of data systems, including the degree of standardization across organizational boundaries and communicability between systems
- Barriers to smooth/timely workflow
  - Policy-based/Regulatory constraints (university, state, federal), including both the policies/regulations themselves and the manner in which they are implemented
  - Audit-based limitations
  - Unsatisfactory “inputs,” such as poorly prepared or incomplete applications
- Ill-defined roles and responsibilities: Defined? Overlapping? Understood by others?
  - Unmet training needs
  - Staffing resource limitations
  - Internal communication lapses
- Internal communications of benchmarks, performance measures, and internal timetables: Are expectations clearly communicated?
- External communications for status reporting: Formal contact channels with customers? Defined timelines?
- Best practices
- Unit assessment: Which units prepare grants? What resources do they employ?
IV. Assessment

A. Pre-Award

The pre-award process consists of all activities from proposal development to the receipt and processing of the award, up to the point of account setup. The units responsible for these activities report to the Vice Chancellors for Research on the Chicago and Urbana campuses.

University of Illinois Research Administration Units
The following section describes each of the major pre-award processes that the Task Force evaluated:

1. Proposal Submission

Proposal submission is the first step in the pre-award process and includes the management and coordination of faculty and staff efforts to obtain external funding from federal, state, local, and private sponsors. Staff members within the Office of Research Services (ORS) on the Chicago campus and the Office of Sponsored Programs and Research Administration (OSPRA) on the Urbana campus are responsible for the proposal submission process and offer guidance and support to the U of I research community. Staff assist with proposal preparation, including budget review; review of the final proposal to ensure compliance with funding agency guidelines and requirements, university policies and procedures, and state and federal regulations; and, finally, actual submission of the proposal package to sponsors.

ORS and OSPRA serve as a resource for research unit staff and investigators regarding all aspects of the proposal submission process. Staff members serve as liaisons to funding agencies, answering questions and responding to requests for additional documentation to support award issuance.

Staff Roles and Responsibilities

The Proposal Submission team handles many components of the review process on their respective campuses, including:

- Reviewing proposal packages to ensure consistency with agency guidelines
- Verifying compliance issues: IACUC, IRB, Significant Financial Conflict of Interest\(^3\)
- Reviewing budgets: rates, cost sharing, waivers, budget justification to budget detail comparison
- Reviewing the abstract and scope of work to ensure the appropriate activity type (research, instruction, public service activities)
- Working with unit support staff and/or PIs to resolve discrepancies and inconsistencies
- Obtaining the endorsement of authorized institutional representatives (e.g., Department Head, Vice Chancellor for Research)

The UICORS Proposal Submission team consists of six FTE: one Senior ULeRA Coordinator, four Research Coordinators, and one Budget Reviewer. Of the six ORS staff members, two are Certified Research Administrators (CRAs). The CRA designation indicates that an individual has met the requirements of the Research Administrators Certification Council and has demonstrated a level of knowledge necessary for a person to be a professional research or sponsored programs administrator.\(^4\)

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\(^3\) According to federal guidelines (42 CFR Part 50 Subpart F), a Financial Conflict of Interest exists when an Institution, through its designated official(s), reasonably determines that an Investigator’s Significant Financial Interest is related to an NIH-funded research project and could directly and significantly affect the design, conduct, or reporting of the NIH-funded research.

\(^4\) Additional information on the Research Administrators Certification Council and CRA is available at: [http://www.cra-cert.org](http://www.cra-cert.org).
The UIUC OSPRA Proposal Submission team consists of six FTE: one Assistant Director, one Senior Coordinator, and four Coordinators. Currently, OSPRA does not have any Certified Research Administrators on staff.
In addition to reviewing proposals, ORS and OSPRA staff are responsible for developing training materials, hosting workshops, and giving presentations to inform and educate faculty and staff.

OSPRA and ORS staff members also maintain and update their respective unit websites, which are the main tools used to communicate with campus stakeholders. ORS staff members also assist with post-award requests, including no-cost extensions, budget revisions, funding carryover, and relinquishing statements. On the Urbana campus, these same requests are routed through the post-award process (Grants and Contracts Office).

**Process Overview**

The proposal support team on each campus initiates the proposal review and submission process at the time a proposal is received. ORS and OSPRA handle proposal intake, scanning, and uploading proposals into UI-eRA, the University of Illinois electronic Research Administration system, for faculty and staff on their respective campuses. In addition, ORS handles proposal submissions for the College of Medicine located in Rockford and Peoria.

**Proposal Review:** ORS staff members are assigned proposals as they come in, with the staff member next in the queue taking the next proposal that is received by the unit. Proposals, however, are triaged based on agency deadlines, so it is possible that the review of a proposal may be delayed to allow staff to complete work on those with the most pressing time constraints.

On the Urbana campus, a designated OSPRA proposal coordinator is assigned to each department. The proposal coordinator is responsible for reviewing the proposals submitted by his or her assigned department(s). The coordinator’s assignment establishes a relationship with departmental faculty and staff, enabling the coordinator to become familiar with sponsors and certain types of grant proposals. OSPRA has contingency plans in place to accommodate departmental needs when the assigned proposal coordinator is out of the office or has a higher than normal volume of proposals requiring immediate assistance. The Assistant Director of OSPRA receives a daily UIeRA report, used to monitor proposals currently in progress, current staff workloads, and upcoming deadlines.

ORS/OSPRA staff must verify that a proposal is current, complete, and accurate. Proposals can lose priority within a funding agency if the submitted materials are incomplete, so faculty members are encouraged not to submit proposals without prior college, department, center, institute, and ORS/OSPRA review and approval. The approval process is completed using the proposal approval form (PAF) on the Chicago campus (Appendix E) and the proposal transmittal form (PTF) on the Urbana campus (Appendix F). While both forms collect similar information, there are fields unique to each campus. For example, UIC requests data on the distribution of college and department facilities and administrative (F&A) costs, while UIUC does not request this information. Additionally, UIC has an expanded conflict of interest certification, as the PAF serves as the first documented source of conflict disclosure related to sponsored program activity. UIC requires the signatures of all researchers under the proposed project, while UIUC requires only PI and co-PI signatures to certify that all researchers are in compliance with the appropriate conflict of interest policies. Completion of the PAF/PTF and
obtaining necessary approvals is a manual process that requires the physical routing of forms for signatures. This is a time-consuming exercise for researchers and business support staff.

Proposal Approval and Routing: All proposals require approval on some level. Approval is evidenced by signatures on the PAF/PTF. On the Urbana campus, after the investigator and co-investigator(s) have signed the forms, the department head, director, or dean of the associated submitting department, unit, or college, respectively, must approve the proposal. If more than one department or unit is involved, each unit head must sign. Proposals that require significant use of facilities or staff from several different colleges are to be approved by the dean of each college involved.

On the Urbana campus, college-level approval is required on each PAF/PTF submitted. Opportunities exist to reduce the number of approvals for proposal submission. Certain colleges at UIC (e.g., College of Medicine, College of Engineering, and School of Public Health) are not required to seek approval from the dean of the college. There may be opportunities to expand this allowance to other colleges across the campuses.

If there is a significant change in the proposal (e.g., budget), the deans, directors, and department heads involved must review and approve the proposal materials again. Due to time and resource constraints, however, collecting these signatures for a second time is determined on a case-by-case basis and is dependent on the changes made to the proposal. Defining the process and clarifying when proposal changes should be rerouted through the relevant departments and units for approval would help to achieve standardization across and between campuses while reducing potential routing delays.

Campus leadership should clearly define when the approval of revised proposal materials is required, and should consider eliminating the need for dean or department head signatures on the PAF/PTF if the department or college is not committing matching funds.

Federal Grant Proposal Submission: A significant portion of federal grants are submitted through Grants.gov, an online system that provides a single access point for over 900 grant programs offered by the 26 federal grant sponsoring agencies. As a portal for grant applications, Grants.gov allows institutions to electronically find and apply for competitive grant proposals, and has replaced the paper copy submission process.

On the Chicago campus, investigators submitting proposals through Grants.gov submit a hard copy of the proposal to ORS that includes the completed PAF, detailed budget, budget justification, abstract/scope of work, and appropriate agency forms. The investigator must also submit the Grants.gov file electronically to awards@uic.edu for ORS review and approval. ORS gives each PAF a unique number and assigns a reviewer to the proposal. ORS does not begin reviewing the proposal until both a hard copy of the proposal and the Grants.gov file have been received. Then, the assigned reviewer reviews both the hard copy and the electronic Grants.gov file to ensure consistency and recommends changes or corrections as needed. If no changes are needed, ORS notifies the investigator that the application is ready for submission to the agency. According to UIC policy, investigators are required to submit Grants.gov proposals to ORS at
least 7 business days prior to the agency submission deadline. However, the majority of proposals are received an average of only 3 days prior to the agency deadline.

Not all federal grant submissions are made through Grants.gov. For example, proposals for the National Science Foundation (NSF) grant funding are submitted via FastLane, an interactive real-time electronic system. In FY2012, funds awarded by the NSF made up approximately 20 percent of the total UI research portfolio.

Proposal Budget Development and Review: A sponsored project budget is an estimated financial representation of the proposal’s statement of work. Consequently, a proposal’s budget should demonstrate how the university would achieve the project’s objectives with an appropriate amount of resources. Careful budget preparation is essential to a successful research proposal and requires a significant amount of time during the proposal development process. It is a manual process that involves pulling information from various sources. Projected costs must conform to the federal cost principles as prescribed in OMB Circular A-21 in conjunction with cost accounting standards and applicable university policies.

Many agencies provide specific budget forms, but the basic categories of direct costs and Facilities and Administrative (indirect) costs apply to all agencies. Direct costs are those that can be identified specifically with the funded project. Facilities and Administrative (F&A) costs are costs that are incurred for common or joint objectives, and therefore, cannot be identified readily and specifically with a particular sponsored project, instructional activity, or any other institutional activity. It is the responsibility of the department and/or ORS/OSPRA (depending on the level of staffing in the department) to review proposal budgets and determine that all costs are allowable and allocated correctly between direct and indirect cost categories.

The current budget development and review process is highly decentralized and inconsistent across the campuses. Sponsors do not always provide a budget template, and/or the complexity of the budget requires the use of a project-specific spreadsheet or other tool to help determine detailed costs. There are significant differences across campus departments and units in the amount of support provided for budget development as well as in the capability of available budgeting tools.

ORS is currently developing a budget template that will include a common budget format and incorporate current rates (for cost sharing, tuition remission, fringe benefits, and F&A). The template will be flexible and easily adjusted based on the budget requirements of different funding agencies. Following the successful completion of beta testing, the budget template will be available to faculty and staff on the Chicago campus, and ORS will strongly encourage all researchers to use the new template. OSPRA currently provides a Modified Total Direct Costs (MTDC) Basis template and a Total Direct Costs (TDC) template, as well as a USDA-specific template. Budget templates are available on the OSPRA website or by request.

5 https://www.fastlane.nsf.gov
7 Cost accounting standards are published by the Cost Accounting Standards Board, an entity within the U.S. Office of Management and Budget, and are applied to educational institutions through OMB Circular A-21.
Exceptions that must be reviewed and considered during the proposal process are usually directly related to the costs outlined in the proposal, including:

- Indirect Cost Waivers
- Cost Share
- Fringe Benefits
- Budget exceptions

**Indirect Cost Waivers**

Indirect costs, or Facilities and Administrative (F&A) costs, represent the real costs of the university infrastructure (e.g., administrative, operational, or maintenance costs). These costs cannot be specifically assigned to a particular project, and so are charged to the sponsored project as a percentage of the direct cost items. Full recovery of indirect costs is expected on all sponsored research agreements. F&A cost rates are established by negotiation with the Federal Government, and a predetermined rate agreement is in place covering the period of July 1, 2011 through June 30, 2015. There are separate rates for instruction, research, and other sponsored activities, and for each of these, there are rates for on-campus and off-campus projects. F&A rates continue to be charged at the awarded rate throughout the sponsored project or the term approved by the funding agency at the time of the award. Proposals are to use the approved rates except when the sponsor is a governmental agency or not-for-profit entity, which formally limits F&A through a published policy, or when the department or unit has obtained the approval of the Vice Chancellor for Research for a full or partial waiver of F&A costs. If the F&A rate in the proposal is less than the negotiated rate, a waiver must be approved by the department head, dean of the college, and campus Vice Chancellor for Research prior to submission of the proposal to the sponsor. Industry and for-profit sponsors must pay the full rate.

Approval of the F&A waiver by the Vice Chancellor for Research must accompany the proposal materials submitted to ORS/OSPRA. F&A waivers are included in 5 percent to 10 percent of the proposals submitted, and are more likely to be included in proposals for funding from non-for-profit or state sponsors. On the Urbana campus, a waiver is not required if the sponsor has a published policy that addresses F&A rates. Researchers on the Chicago campus, however, must submit a waiver regardless of whether or not a sponsor documents F&A rate requirements. There is an opportunity to standardize processes across campuses and reassess UIC’s requirement of a waiver for projects whose sponsors provide defined F&A policies.

**Cost Share**

Cost share is the portion of sponsored project costs that is not borne by the sponsor, and for federal activities, cost sharing must be provided from non-federal funding unless approval is obtained from the sponsor. It is important that proposals with significant cost-sharing or matching-gift requirement be thoroughly reviewed by ORS/OSPRA staff prior to submission to ensure compliance with appropriate rules and regulations, as both represent a formal commitment of university resources. The university is subject to periodic audits to determine if it is consistently applying these policies. For this reason, individuals responsible for the assignment of costs must be fully aware of the applicable policies and conform with them diligently. Noncompliance with established policies could lead to cost disallowances, refunds with interest and penalties, and increased audit surveillance by federal audit agencies and
Inspectors General. Proposals with cost sharing require additional approval. The Provost must approve the commitment of campus funds, and both the Provost and Vice President for Academic Affairs must approve the commitment of university funds.

**Fringe Benefits**
In order to simplify the preparation of proposal budgets, fringe benefits can be estimated using established percentage rates. The fringe benefit rate is expressed as a percentage of salary; the dollar amount is calculated by applying the appropriate fringe benefit rate to each individual’s salary to be charged to the sponsored project. The rate varies depending on the individual’s classification such as faculty, postdoctoral fellow, graduate student, and undergraduate student. Some sponsors will not allow the payment of fringe benefits with grant funds. This disallowance needs to be documented and handled by ORS/OSPRA on an individual basis. Fringe benefits cost can often be included with the salary expense or absorbed via cost sharing.

**Budget Exceptions**
Generally, the allowability of expenditures under sponsored programs is determined according to OMB Circular A-21. However, each sponsoring agency determines the allowability of costs charged to a project. Sponsors may set forth limitations or exclusions of costs, or alternatively, provide for allowability of certain costs. There is no simple method to monitor these exceptions. If research is privately funded or certain costs are allowable under a particular federal program, however, additional diligence is needed to confirm the allowability of costs according to sponsor specifications.

Many program or project budgets include costs that are typically considered unallowable under federal regulations. The majority of unallowable expenses are overhead costs such as administrative or clerical salary support, office supplies, and copying and printing charges. Laptops, iPads, and other computer equipment are often included in the project budget as expendable equipment, but it is difficult to justify these expenses according to federal guidelines.

**Faculty Feedback**
Several of the federal funding agencies that sponsor the majority of U of I research have begun focusing on large, cross-disciplinary research initiatives. As the competition for future federal funding intensifies, it is critical that the university leverage the breadth and depth of its research expertise both within and between campuses. As such, it is important that the proposal submission process be streamlined and a focused effort be made to decrease the administrative burden on faculty.

As multi-institutional proposals and programs become more common and important, greater emphasis is being placed on interdisciplinary research, and collaboration among departments and across campuses is critical. It is often not clear where faculty can obtain administrative support to develop proposals. Roles and responsibilities for research administration are not well understood, which creates confusion and results in a lack of overall accountability.

From the faculty perspective, there are two primary challenges with proposal submission:
1. It is a time-consuming process—complex and manual—thereby increasing faculty administrative burden and taking time away from research efforts.

2. Inadequately staffed research administration units present a significant barrier to successful proposal submission.

These challenges threaten the competitiveness of the university’s research enterprise, as faculty will ultimately submit fewer proposals. The current proposal submission process relies heavily on the manual completion of tasks, and processes are delayed as documents are physically transferred between staff at various offices. The requirement for obtaining wet signatures on proposal routing/approval forms is burdensome, especially for projects involving multiple faculty members from different units, colleges, or campuses.

Faculty finds the forms required for proposal submission to ORS/OSPRA lengthy and complex. A new form must be completed for each proposal submitted for review, which is redundant and time-consuming. An electronic form would minimize this duplication of effort. Existing information and data should be leveraged to populate fields.

The campuses should consider following a “Turbo Tax” model for the proposal submission process, designed to guide faculty step-by-step, as well as developing a central proposal repository.

The development of a university database or central repository that contains proposals that were previously awarded can assist faculty in determining if their project is a potential match with the funder based on the types of projects that have been funded and their award amounts. This archive would also provide examples of what a successful proposal looks like. This information would help faculty to set benchmarks for success and increase the likelihood of producing a successful proposal.

Faculty and other research staff have an opportunity to attend campus workshops on grantsmanship that are intended to help with the preparation and submission of competitive grant proposals. Creating a compelling grant proposal, however, is often dependent on the funding agency that is soliciting proposals.

The campuses should consider hosting representatives from the National Institutes of Health (NIH), the National Science Foundation (NSF), or other major funding agencies to give seminars on what a competitive grant proposal looks like from the perspective of the sponsor and inform the research community about new policies and procedures.

Staff Feedback
An overall lack of accountability impacts the efficiency of the proposal submission process and creates significant challenges for staff in the research administration units responsible for supporting campus researchers. From the ORS/OSPRA staff perspective, the biggest challenge is the timeliness of submissions by faculty. Late submissions result in stressful deadlines for proposal reviewers as well as the potential for an incomplete review of the proposal. In addition,
the work on proposals for other researchers who have submitted in a timely manner must be set aside to complete work on those with the most pressing time constraints. ORS/OSPRA staff emphasized that they make every effort to submit proposals on time regardless of when the proposal was received.

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<th>Total Proposals</th>
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<td>&gt; 5 days</td>
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<td>ORS*</td>
<td>1,497</td>
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<td>OSPRA**</td>
<td>1,085</td>
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*ORS did not have a “days prior to agency deadline” breakdown of the data.
**This is a subset of major federal agencies.

On average, 30 percent of the federal proposals submitted to OSPRA are received within 24 hours of the agency submission deadline.

The Vice Chancellors for Research should work with department-, unit-, and college-level administration to develop methods for increasing compliance with internal proposal submission deadlines on each campus.

On the Chicago campus, faculty are responsible for submitting a proposal and all required internal documentation to ORS for proposals that are to be submitted through Grants.gov at least seven days prior to the agency’s proposal deadline and a minimum of three days for other proposals. OSPRA on the Urbana campus requires five business days for Grants.gov proposals and three business days for other proposals. A five-day deadline is fairly standard among research universities, with some institutions requiring as much as a 10-day deadline for submissions. If a proposal reaches OSPRA with insufficient time for review, OSPRA will conduct a post-submission review.

Large federal funding agencies such as the National Institutes of Health (NIH) have standard cyclical due dates for proposal submission (e.g., February, June, October). As a result, a large number of faculty submit proposals to ORS/OSPRA at the same time, resulting in a bottleneck in the review process. Staffing challenges further complicate the timely review of proposals during busy times.

Reduced internal lead-time adversely impacts the quality of review and may ultimately lead to the submission of a proposal containing errors. Certain errors will prevent a proposal from being processed by the agency. ORS/OSPRA can only correct and resubmit a proposal that has been returned as the sponsoring agency’s electronic system and time allow. The number of resubmissions due to proposal errors is not formally tracked in UlERA. However, proposal resubmissions significantly increase the administrative burden of ORS/OSPRA staff.

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It is difficult for ORS/OSPRA staff to adequately provide quality support services to researchers when a significant amount of time is spent scrambling to meet funding-agency deadlines, because a majority of proposals have not been submitted for review in a timely manner. Encouraging faculty members to submit sections of their proposals in advance can help to expedite the review process. The responsibility of each individual or unit in the review process should be clearly defined. For example, it is the responsibility of the faculty member to review the content for scientific merit, while the departmental business manager is often responsible for compiling all of the sections of the proposal, including the budget, budget justification, statement of work, and PTF/PAF. ORS/OSPRA staff then performs a high-level review of the entire submission, which includes all of the tasks noted on page 22 of this report. A knowledgeable departmental business manager can effectively strengthen the proposal review process, thereby decreasing the burden on research administrative staff and enhancing overall faculty satisfaction.

Compliance with internal deadlines supports a first-in, first-out model for proposal review, and will allow staff to proactively stay on top of their workload by prioritizing tasks based on when proposals are submitted rather than when they are due. Internal deadlines allow ORS/OSPRA staff to complete a more thorough and detailed review of proposals, which will enhance compliance with sponsoring agency guidelines and enhance the quality of proposal submissions. More than half of the proposals submitted to sponsoring agencies are rejected because they do not match the funding program requirements, the applicant has not followed directions, or the proposal is incomplete. In FY2012, a record number of the proposals submitted by UI researchers was rejected by the granting agency due to late submission and/or missing proposal information.

Proposal success is directly correlated to the number of days ORS/OSPRA staff has to review the proposal. Federal proposals submitted to OSPRA by the specified internal deadline have a 25 percent acceptance rate on average, compared to 7.5 percent (of total proposals) of those submitted less than 24 hours prior to agency deadline. NIH proposals submitted to OSPRA less than 24 hours prior to the submission deadline have a slightly higher success rate: 13 percent. NIH is the only federal agency that allows proposals to be resubmitted (once) following the initial submission. For OSPRA reporting purposes, multiple submissions to NIH are reported as a single submission rather than one failed submission and one successful submission.

Nothing is more important when applying for a grant than providing accurate and complete information. The most common reason that proposals are rejected is not following instructions. Proposals also often provide incomplete information.

ORS/OSPRA should provide researchers with an easily accessible “Most Common Errors in Grant Proposals” document to help them to prepare more successful proposals.

A second staff concern is the use of electronic submissions. The transition from paper submissions to electronic submissions has improved submission efficiency, but it has also created new challenges. It is difficult to maintain central office review when some systems do not require a submission form. If proposal materials submitted electronically are not consistently
shared with ORS or OSPRA prior to submission, there may be missing or inaccurate information due to the lack of review. Additionally, researchers who independently submit proposals with cost-sharing requirements without the proper approval put the university at risk financially.

On the Chicago campus, faculty members are encouraged to submit NSF proposals to ORS for review prior to submission through FastLane, but it is not required. Proposals submitted directly through FastLane by a faculty member do not require a PAF. If the proposal is not submitted through ORS and the faculty member chooses to submit his or her proposal directly to NSF, ORS requests that the final proposal package be submitted to ORS within five business days following the formal submission to the agency. ORS does not consistently receive a copy of the final NSF proposal, and a PAF is completed only if the grant is awarded. As a result, a majority of the proposal information is not available in ORS. This creates challenges for staff members during award setup. ORS staff spend a significant amount of time obtaining missing information or collecting signatures for incomplete PAFs, which is often difficult as researchers are not always accessible.

Recent estimates suggest that the competitiveness for awards and the current economic climate have driven average national success rates for proposals down. For example, the success rate has dropped to 24.0 percent\(^9\) for NSF proposals and 20.3 percent\(^10\) for NIH proposals from higher rates of 30 to 35 percent just 10 years ago. As such, it is critical that campus leadership address the timeliness of proposal submission.

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**The Vice Chancellors for Research should address the timeliness of proposal submission and implement methods for improving compliance with internal deadlines to facilitate effective proposal review and submission.**

Certain colleges and units within each campus have made investments at the unit level, including the School of Public Health on the Chicago campus, which has made voluntary proposal peer reviews available to faculty. Also, UIC faculty members are required to submit a hard copy of their proposal to ORS for review two to three days prior to the sponsor’s submission deadline.

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**The Vice Chancellors for Research should evaluate proposal submission processes and consider the implementation of appropriate process improvements, including the creation of dedicated grant support teams and the certification of departmental business staff with proven knowledge of proposal submission requirements.**

Best practices at other large research institutions suggest several process improvements for consideration, including:

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\(^10\) *Research Project Grants (RPG) and Other Mechanisms: Competing Applications, Awards, Success Rates and Total Funding Made with Direct Budget Authority and Superfund Funds by NIH Institutes/Centers, Grant Mechanisms and Activity Codes Fiscal Year 2012.* Office of Research Information Systems, Office of Statistical Analysis and Reporting, National Institutes of Health. 19 December 2012.
• Offer an extra level of review and support for those proposals received in advance of the deadline. Over time this review could be supported through metrics to show an increased rate of award acceptance for these proposals.

• Permit investigators to submit the science portion of the proposal later than the remainder of the document to allow ORS/OSPRA additional time to review the other sections of the proposal.

• Institute penalties for faculty or staff who continually submit late proposals through a defined escalation process, such as imposing a processing fee for proposals received after the deadline or stricter expectations for earlier notification of pending grant submissions and due dates.

A growing number of institutions have responded to the increase in competition for awards by creating dedicated grant support teams composed of individuals (with doctorates or experience with grant development and submission) that are tasked with increasing the volume and quality of proposals. These individuals focus on creating competitive, well-written proposals, while allowing faculty to focus on the science of the proposal. This practice also allows faculty to dedicate a greater percentage of effort to research, clinical, and academic pursuits.

It is also becoming increasingly common for institutions (e.g., Penn State University) to certify departmental staff in colleges and units to submit proposals directly to the sponsoring agency. Implementing a similar policy at the University of Illinois would reduce the workload of ORS/OSPRA staff to allow more time for proposal review; this should be evaluated further.

**Challenges: Staffing**

ORS and OSPRA have made an effort to streamline the proposal submission process by providing key forms on their websites. Research information systems are becoming increasingly important as the administrative burden on faculty continues to increase while budgets decrease. Efforts should be made to reduce the administrative burden on faculty and staff by using electronic processes, which will also enable support staff to focus less on clerical responsibilities and devote more time to proposal review and submission. The development and implementation of an enterprise-wide electronic system that is currently in progress may potentially resolve these issues.

**Efforts to eliminate paper forms and automate processes should continue, including eliminating the use of paper forms and transmittal forms when the information is available electronically. Web portal capabilities should also be enhanced, such as through providing electronic fillable PDF forms or electronic submission when not already available.**

Successful proposal submission requires the dedicated support of the ORS/OSPRA staff, but these units are currently working beyond their capacity. The workload for staff managing proposal submission currently exceeds the average of 116 proposals per FTE for other institutions.11

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The relationship between research activity and administrative support is based on historical norms. Without adequate administrative support, faculty and staff are unable to submit the volume and quality of proposals that are required to grow the university’s research portfolio.

The Vice Chancellors for Research should regularly evaluate ORS/OSPRA staffing levels and adjust staffing based on evolving workloads.

As workloads increase, the quality of review diminishes, since staff has less time to dedicate to each proposal. The high turnover rate in both ORS and OSPRA over the last few years has caused staff to assume additional responsibilities. As new employees are hired to fill vacant positions, they are subject to a learning curve before they are able to manage the necessary workload. This indicates a need for more resource support but also emphasizes the need for improved training programs.

There is a lack of consistent administrative support for proposal submission in various units and colleges. Varied staffing levels in units can place increased demands on faculty time, and create unbalanced workloads between campus unit staff and ORS/OSPRA staff. In contrast, well-supported research administration units with dedicated staff provide a strong base of support. Department- and unit-level support staff can review proposals prior to submission to ORS/OSPRA, alert faculty to upcoming deadlines, and help streamline the proposal review process.

A successful submission is submitted in a timely manner and includes complete documentation. Departments/units with records of successful submissions have experienced staff, dedicated pre- and post-award staff, and support from a college with a centralized grants infrastructure. The following departments/units have been identified as having a successful submission record:

UIC: College of Dentistry, Center for Nursing, College of Applied Health Sciences (Kinesiology & Nutrition), College of Medicine (Microbiology, Pharmacology, Physiology & Biophysics, Psychiatry, Pharmacology), College of Pharmacy (Medicinal Chemistry & Pharmacognosy), and School of Public Health

UIUC: Beckman Institute for Advanced Science & Technology, Department of Computer Science, Department of Mechanical Science & Engineering, School of Chemical Sciences, School of Molecular & Cellular Biology
Departments and units with successful track records in proposal submission usually have staff that are experienced and have been in the same position for 10 to 15 years on average. Additionally, many of the departments have dedicated pre- and/or post-award staff. Similar to colleges with a centralized grants structure, departments with dedicated staff are successful because knowledgeable staff members that understand processes support faculty efforts.

ORS staff noted that UIC Colleges with dedicated research administrative staff are the most effective at proposal submission. Research administrative staff at the college-level has a basic understanding of UIC policies and procedures, federal sponsored project regulations, and the fundamentals of research administration. In addition, college-level staff is responsive to inquiries, submits proposal materials in a timely manner, and is able to cover the responsibilities of absent colleagues. UIC departments and units with dedicated research staff have proven to be moderately effective, but less so than college-level support. The quality and completeness of the paperwork submitted to ORS for final review and approval varies depending on the fundamental knowledge and/or training of the individuals in these roles. There may be inconsistencies due to unit- or department-level policies and procedures.

Staff coverage in the event of absences varies; in some instances there is no coverage. UIC departments with little-to-no dedicated staff are the least effective. The quality and completeness of documents submitted to ORS is adversely impacted due to a lack of knowledge of university policies and procedures. In some instances, the researcher completes and routes his/her own paperwork without any assistance from departmental business staff. Inconsistencies often arise due to differences in processes across departments, and it is more likely that documents requiring institutional review will be submitted without being routed to the appropriate administrators for approval. Additionally, if a project contact is out of the office, there is typically no other person in the department identified from whom ORS staff can request assistance.

Department and unit staffing levels should be evaluated regularly and adjusted based on proposal volume. In addition, there needs to be a contingency plan for staff absence and departure. Some departments have only one staff member who coordinates the proposal submission process.

**Challenges: Communication**

Another important issue is that campus departments often do not communicate about faculty effort on sponsored projects. The university is required to maintain records that measure the amount of employee effort and compensation expended on individual sponsored projects (see the section on Effort Reporting). The commitment of effort begins with proposal submission. Proposals, in most cases, must show the percentage of effort that the principal investigator and other key personnel intend to commit to the project. The percentage of effort assigned to an individual for a sponsored project must be expressed as a percentage of the total effort necessary for that individual to fulfill all of his or her university responsibilities. The problem is in the potential for faculty to over-commit their effort. If that overage of commitment is occurring through a combination of projects through the home unit and in an interdisciplinary center, no one unit representative (other than the investigator themselves) would have that information and be in a position to monitor or correct the situation.
ORS/OSPRA should develop and document a communication strategy for sharing information with researchers and departmental business staff.

Regular and effective communication among ORS/OSPRA staff, researchers, and business support staff is also critical. There are common problems with grant proposal development that do not necessarily hurt a researcher’s chances of receiving the grant but make the process more time-consuming. Informing researchers of these issues can help make the proposal submission process more efficient. Common errors can also be brought to a researcher’s attention to prevent the same mistakes on the next proposal that he or she submits.

Common proposal submission errors noted by ORS and OSPRA staff include:

1. Proposal materials
   - PAF/PTF missing information
   - Incomplete proposal information (e.g., missing signatures, support letters, or bio sketch)
   - Incorrect proposal type listed (e.g., new, revised, continuation, supplement)
   - Sponsor contact information not provided
   - Sponsor guidelines defining page limitations and formatting not followed
   - Missing agency-specific components such as a NIH Commons ID, prior NSF support, rate agreements, etc.
   - Institutional information errors (e.g., incorrect legal name, university fiscal officer, mailing address, or DUNS listed)
   - IRB or ACC/IACUC approvals provided without institutional verification

2. Cost share
   - Cost share not documented properly on PTF
   - Lack of documentation to support cost share
   - Inadvertently agreeing to voluntary cost sharing based on the wording of the proposal narrative, budget justification, etc.

3. Rate
   - Reduced indirect cost rate not supported by published policy or approved waiver
   - Incorrect rates for fringe benefits, tuition remission, or indirect costs
   - Fringe and/or F&A rates not supported in budget justification

4. Budget
   - Incorrect calculations
   - Costs not justified, especially office supplies, administrative personnel, computers and equipment
   - Consultants, subcontracts or subawards, and vendors categorized incorrectly
Challenges: Training

OSPRA has established the Research Administration Management Program (RAMP) in an effort to provide structured training and education to faculty and unit administrators on key aspects of proposal submission and sponsored programs administration. Training on the Chicago campus is primarily *ad hoc* and based on specific issues such as NIH Research Performance Progress Reports, financial conflict of interest guidelines, and CTSA clinical research, and does not exist as part of a formal training program. Historically, both campuses lacked a formal internal training program for ORS/OSPRA staff, with new staff members being trained primarily by shadowing other experienced staff. The lack of consistent training for proposal support staff hinders the ability of these units to provide consistent service to researchers. Recently, OSPRA has initiated a formalized guidance document for internal training purposes.

Campus leadership should consider implementing a formal training and certification program for all research administration staff.

Challenges: Information Technology

The need for systems to more effectively capture pertinent proposal data is apparent across campuses. The implementation of an enterprise-wide electronic system can ensure that Institutional Base Salary (IBS) calculations are consistent, as well as increase the accessibility of this information during the proposal submission process. Before the process can be automated, however, it is critical that roles and responsibilities are defined and documented.

As part of the proposal submission process, researchers may request salary support from a sponsor or provide effort on a sponsored project in the form of cost sharing. Institutional Base Salary is the annual compensation paid by the university for an employee’s appointment, whether that individual’s time is spent on research, teaching, public service, or other activities. The cost of salary or wages charged to a grant, contract, or other sponsored research agreement must be based on an individual’s IBS. This is fundamental to the university’s compliance with the requirements of OMB Circular A-21. Financial penalties, expenditure disallowances, and harm to the university’s reputation could result from a failure to accurately propose, charge, and/or document salaries related to sponsored programs.

There is often confusion and inconsistency in determining an individual’s IBS due to the many commitments of faculty (research, teaching, etc.). Faculty with 9-month appointments must annualize their salary to twelve months when establishing the IBS. Service in Excess agreements that are designed to compensate faculty or staff for services provided outside of their normal duties further complicate IBS determination, because any portion of compensation paid by the university that is deemed to be at-risk or temporary is excluded from an individual’s IBS. It is the responsibility of the researcher to ensure that all requests for salary support in a sponsored program proposal are approved and accurate.

ORS and OSPRA primarily rely on the PAF/PTF approval process to verify IBS. Department- and college-level signatures on the PAF/PTF indicate when the proposal content has been confirmed and is accurate, including IBS. Faculty members rely on the business staff in their respective departments or the business office within their college to provide the IBS, but it is
becoming increasingly apparent that the IBS provided is not always accurate. Inconsistent IBS calculation puts the university’s research portfolio at risk and impacts financial reporting. As a result, on the Chicago campus, there has been a push for the final verification of IBS to reside within ORS rather than in the department or college. However, with a significant number of proposals submitted just prior to funding agency deadlines, it is not feasible for ORS staff to spend a significant amount of time verifying IBS on each proposal.

ORS has worked with Business Information Systems (BIS), an OBFS unit that provides assistance with creating custom software applications, to develop a salary verification system. Due to system search limitations, high proposal volume, proposal review deadlines, and a lack of sufficient resources, the implementation of the salary verification system was postponed. Successful implementation in the future will depend on performance resolution (i.e., the migration of salary data to the enterprise data warehouse, as suggested by BIS) and additional ORS resources.

Campus leadership should work with ORS/OSPRA to define roles and responsibilities and identify which tasks should be handled at the department-, unit-, and college-levels. In the case of IBS, it should be generated from the centralized system.

2. Contract Negotiation

ORS and OSPRA are the units responsible for the negotiation, execution, and modification of contracts for their respective campuses. After a proposal has been selected for funding, the negotiation and acceptance process begins. Awards are reviewed, and if necessary, negotiated by the appropriate ORS/OSPRA staff members to ensure that the terms and conditions are acceptable. As appropriate, ORS/OSPRA staff consults with the investigator, department or unit administrators, and other administrative offices, such as the University Counsel, Office of Technology Management, Office of Risk Management, or OBFS Grants and Contracts. The negotiation process can take as little as a few days or as long as several months.
Staff Roles and Responsibilities
The ORS Contract Negotiations sub-unit has 11 FTE positions: eight Contract Negotiators and three Contract Support staff.

UIC Office of Research Services (ORS)
The OSPRA Award Administration sub-unit, which is responsible for contract negotiation and execution, has 11 FTE positions: two Assistant Directors, two Senior Award Negotiators, and seven Award Negotiators.
FTE allowance is based on the volume of contracts handled by the office. On average, UIC Contract Negotiators handle approximately 90 active contracts at a time, while the current average workload for UIUC contract negotiators is about 45-50 active contracts at any one time. Each staff member’s workload depends on the colleges in his or her portfolio and the complexity of the contract. As such, workloads are not consistently balanced across staff members. The complexity of a contract is not directly linked to its dollar amount. For example, one staff member cited his experience with small contracts valued at under $2,000 that were viewed as problematic and time-consuming when compared to a $2M contract that was executed in around the same amount of time without difficulty. Additionally, the volume of contracts currently under review is highly variable. A large number of contracts may be submitted at any given time; it is difficult to predict workload.

The Vice Chancellors for Research should consider allocating resources for additional contract negotiation staff in ORS/OSPRA, and designating authority to execute legal decisions to appropriate staff members.

Increasing the number of FTEs responsible for contracts would allow for more timely responses to faculty inquiries and quicker follow-up on issues. ORS currently has a backlog of contracts that requires input from or review by University Counsel. Hiring an attorney or working with associates at the University Counsel would help to facilitate the negotiation process, but only if these individuals had the authority to execute legal decisions.

Process Overview
ORS Contract Negotiators have college-based portfolios, a change implemented over three years ago. Most negotiators have experience with or, at a minimum, knowledge of the contract process for the City of Chicago, State of Illinois, and various private foundations. All of these entities sponsor research projects in multiple colleges across the campus. ORS staff prefers this structure and find it more efficient compared to the previous approach in which contracts were assigned at random as they were received. Having a college-based portfolio enables staff to establish relationships with both the sponsoring agencies and researchers, because they regularly engage with the same individuals.

OSPRA is in the process of restructuring its Negotiation team and revising the process for assigning contracts to staff. Currently, contracts and other sponsored-research agreements requiring review are assigned to a Contract Negotiator by agency and/or industry, and in some cases by the investigator. OSPRA is evaluating a transition to a department-based (or college-based) portfolio, similar to how proposals are assigned for review. The exception to this structure is the role of the Assistant Director of Awards, who reviews almost every agreement. While this can be burdensome, the Assistant Director finds it helpful to know what agreements were submitted; a quick scan for potential issues provides an additional layer of review to prevent errors.

Contract Negotiation: At UIC, University Counsel has assigned a legal associate (1 FTE) to the OVCR to support contract negotiations. In the past, a majority of UIC contracts required legal review and approval (not including simple awards, purchase orders, or contract modifications),
but this has recently changed. Contract Negotiators now determine whether the acceptance of award terms and conditions requires additional review and approval (i.e., signatures) and forward contracts to University Counsel as needed. Currently, only contracts associated with clinical trials or clinical research contracts require approval from University Counsel.

The University of Illinois and ORS/OSPRA negotiate contract terms according to federal and state regulations and university policies. Negotiations with sponsors go much more smoothly when sponsors have a similar interpretation of the regulations and are experienced in collaborating with research institutions. There are instances where sponsors do not have this experience and add their own terms that need to be negotiated by ORS/OSPRA staff, thereby extending the time it takes to obtain an executed contract. This often causes additional delays in collecting the necessary signatures from the sponsor. Staffs follow up with the sponsor regularly, usually in 30-, 60- and 90-day increments.

The final budget agreed to by both parties should be reviewed and approved by the investigator before a contract is executed.

Master Agreements: The university has a number of master agreements in place with sponsors that frequently support research at the university. Although master agreements can expedite negotiation, there is still a process required to ensure due diligence prior to executing project agreements. Master agreements often contain preferential intellectual property terms for sponsors. In agreeing to those terms, ORS/OSPRA and the Offices of Technology Management (OTM) take on the responsibility of relaying terms to the researchers and for ensuring some level of understanding of their consequences, rights, and responsibilities. Each time OSPRA receives a task order for execution under a master agreement, staff distribute a summary term sheet for that master agreement and/or discuss the terms with the investigator. Staff members investigate the use of background intellectual property and identify any conflicting rights, working in tandem with OTM and the investigator. OSPRA requires a PTF, proposal budget, and statement of work for each new project under a master agreement. Additionally, staff will explore with the sponsor the likelihood of disclosing confidential information or export-controlled data and technologies.

The University of Illinois General Rules dictate the treatment of research results and provide guidance on policy waivers related to intellectual property.

Unless permitted by the Board of Trustees, the University shall not permanently grant or convey to a sponsor the exclusive benefits of the results of any investigation or research.

If the sponsor conditions its award of funding on the waiver of established University policies, such as…rights to intellectual property generated by research, the University may accept such conditions if required by law or if a waiver is found to be clearly in the interests of the University and the public.

Waivers related to the intellectual property rights must be approved by the Vice President for Research. The determination of all other waivers must be made by
either the Vice Chancellor for Research (VCR) or the Chancellor if no campus VCR exists, or his/her delegate.\textsuperscript{12}

Contract Approvals and Signatures: The Vice President for Research must approve any contracts containing exceptions on intellectual property or restrictions on publication. University policy does not allow the Vice President for Research to delegate approval authority on these matters.

Faculty members are not authorized to sign agreements on behalf of the university. Only those with delegated signature authority (i.e., ORS/OSPRA) are authorized to sign these agreements. There have been rare instances when a faculty member has negotiated and signed his or her own agreement, but this is not permissible under university policies and procedures.

Contract Execution: After a contract is fully executed (i.e., signed by all parties), the transition from pre-award to post-award begins. At UIC, the Vice Chancellor for Research sends a congratulatory email to the investigator and other key research personnel, and copies the Office of Grants and Contracts (GCO). It is the responsibility of the UIC GCO to set up the award in Banner, which typically occurs within ten business days following the receipt of the email.

On the Urbana campus, OSPRA sends a copy of the fully executed agreement to the investigator and the department via email. OSPRA then transfers the agreement and entire file to GCO. GCO sets up the award in Banner, thus completing the transition to post-award administration.

Faculty Feedback
For faculty on the Chicago campus, the primary challenge is the timeliness of contract negotiation. Faculty members are frustrated with the amount of time it takes to complete negotiations. For example, UIC provides professional development programs to teachers at local schools. To enable teachers to attend the sessions, UIC covers the expense of bringing in a substitute teacher. A separate contract is required for each school that participates in the program, which is redundant and time consuming. Issues with state contracts appeared to be most prevalent. Faculty members recognize that issues with the sponsoring agency often cause delays in contract execution, but the perception of most faculties is that the delays are exacerbated by lack of timely follow-up by contract negotiation staff.

Faculty members also criticized the lack of information available on the status of contracts. According to faculty, it is not clear where contracts are in the process at any given time. While this information is available in UIeRA, there are very few faculty or departmental staff that choose to make use of the system because it is not user-friendly.

\textbf{ORS/OSPRA should implement processes and/or systems to facilitate a more effective, user-friendly means of sharing information on contract status. If it is expected that faculty and staff should have the ability to check on a contract’s status in existing systems, access to UIeRA is needed and the necessary training must be provided.}

\textsuperscript{12} General Rules Concerning University Organization and Procedure. Available at \url{http://www.bot.uillinois.edu/general-rules}. 

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There are additional challenges associated with the clinical trials conducted primarily on the Chicago campus. According to faculty, the turnaround time of clinical trial contracts is not ideal. It appears that there are external factors causing the delay in contract execution, but this is not communicated to the faculty whose research depends on the execution of the contract.

**Staff Feedback**

Federal regulations increase the complexity of the contract negotiation process. Staff cited conflict of interest policies and other compliance regulations as the most troublesome. Compliance issues create significant delays in the contract negotiation process. Additionally, ORS/OSPRA often receive inadequate award documentation from the department or unit, which further delays the process.

Similar to the proposal submission process, the overall lack of accountability in meeting internal deadlines impacts the efficiency of the contract process and creates significant challenges for staff in the research administration units. From the ORS/OSPRA staff perspective, the biggest challenge is the incomplete submission of contract materials. Departments and units often submit incomplete documents, which slows down the process and requires ORS/OSPRA staff to follow-up to collect the missing information. Examples of information that is commonly absent at submission include the budget, scope of work, or contact information. Additionally, every contract is deemed urgent by faculty members that submit materials after specified internal deadlines. Contract negotiation staff must remain firm with belated faculty members while still providing a high level of service.

Negotiations with certain sponsors (especially those in the private sector) appear to be delayed due to the same issues. Motivated by maximizing profits or other considerations, companies frequently include contract terms in their agreements that are problematic for university policy and state law. Reaching mutually satisfactory agreements can be difficult given the differences in organizational missions. If the sponsor and the university do not agree to the terms of a contract, the impasse process begins. There are often delays on both sides due to the intricacy of legal review required.

**ORS/OSPRA should implement processes or systems to allow flexibility in negotiation with various sponsors. This would allow the impasse process to begin sooner, thereby reducing the overall amount of time it takes to reach successful contract execution.**

Another approach to alleviate delays is the greater utilization of master agreements. ORS staff members responsible for contract negotiation have suggested that the Chicago campus participate in the University-Industry Partnership (UIDP), which is designed to enhance the value of collaborative partnerships between university and industry.

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13 More information on the University-Industry Demonstration Partnership (UIDP) is available at [http://sites.nationalacademies.org/PGA/uidp/index.htm](http://sites.nationalacademies.org/PGA/uidp/index.htm).
ORS/OSPRA should execute master agreements with sponsors when possible and work with campus leadership to facilitate UIDP participation.

UIDP provides a unique forum for university and industry representatives to meet and discuss operational and strategic issues such as contracting, intellectual property, and compliance. These conversations help industry representatives to better understand the culture and constraints of their university counterparts, and vice versa. Participation in UIDP meetings can provide a means for networking with other research institution administrators and industry officers, which can help build the relationships necessary to facilitate future collaborations and negotiations.

Challenges: Communications

Effectively communicating the roles and responsibilities associated with contract negotiation is often a challenge. Faculty are strongly encouraged to forward any agreements to ORS/OSPRA for review, because staff in these units are familiar with university policies and procedures and are experienced in negotiating fair and reasonable terms.

The Vice Chancellors for Research should work with ORS/OSPRA to clearly define the roles associated with contract negotiation and communicate goals, responsibilities, policies, and deadlines to campus departments and units.

Other opportunities to strengthen communication with faculty and clarify university policies and procedures for contract negotiation include:

1. Internal Timelines
   Internal timelines set for various negotiation types need to be clearly defined and communicated to faculty and staff. The timely submission of contract materials and adherence to deadlines presents a significant challenge.

2. Intellectual Property
   As a public university, the University of Illinois has an obligation to make the results of its research available. As such, it is an exception to that policy for the university to give up publication rights or sign contracts that include the contractual obligation that the sponsor must approve publications. Likewise, intellectual property (IP) ownership is an important consideration that investigators should understand. The contract language does not always make clear sponsor rights to intellectual property that result from a research agreement. Contractual rights to IP need to be clearly interpreted and communicated to faculty.

Challenges: Training

ORS and OSPRA utilize the ULeRA system to track contact with faculty, departmental business staff, sponsors, and others involved in the contract negotiation process. Faculty and staff are encouraged to request access to the system. Most researchers, however, are not aware that it is possible to track award negotiation electronically. AITS provides access to ULeRA along with limited training.
Additional training on working with foreign entities would be beneficial. Federal export and trade regulations impose controls over numerous university activities, including research. Interactions with foreign entities can put the university at risk, so it is important that contract negotiation staff understand how to minimize the impact of export and trade regulations and how to ensure compliance with all applicable regulations. The Office of University Counsel advises campus units on U.S. export and trade laws and regulations and related university policies.

**ORS/OSPRA should work with University Counsel to develop training for staff on export control and foreign entities.**

**Challenges: Information Technology**

The absence of a comprehensive electronic system that connects the various phases of the award process makes it difficult to track turnaround time, volume, etc. The creation of new contracts requires the manual entry of available data into UIeRA. Additionally, the routing of a contract for review and approval is an overly manual process.

**An integrated electronic system should facilitate the routing of contracts for review and approval, and streamline communication between ORS/OSPRA staff and investigators. The system should automatically populate basic contract data into agreement templates, as needed.**

**3. Institutional Review Board (IRB)**

All research involving human subjects that is conducted at or sponsored by the University of Illinois, whether conducted by Illinois faculty or others, must comply with applicable policies for the protection of human subjects. Per federal regulations, the Institutional Review Board (IRB) is given broad authority for ensuring the ethical and legal conduct of human subjects research at the university. The IRB follows widely accepted ethical principles; legally binding federal regulations; and campus policies, procedures, practices, and other guidelines in carrying out this important responsibility.

The Office for the Protection of Research Subjects (OPRS) is responsible for IRB oversight on the Chicago campus and the Institutional Review Board (IRB) Office serves as the official oversight office for human subjects research on the Urbana campus. OPRS and IRB are the central points of contact for investigators, research subjects, and regulatory agencies. These offices provide administrative support for the review and approval of research protocols to ensure that risks have been minimized and the potential for benefit has been maximized before human subjects participate in the research. Additionally, the offices organize and document the IRB review process, monitor research regulations, produce educational programs and materials for faculty and staff, and provide assurance that the campuses are in compliance with federal, state, and campus policies.
**Staff Roles and Responsibilities**

OPRS employs 27 FTE: one Director, three Associate Directors, six Assistant Directors, 10 Coordinators, one Assistant to the Director, and six Administrative Support Staff. OPRS staffing has been relatively steady over the last five years with little turnover. There are four IRB committees on the Chicago campus.
On the Urbana campus, the IRB office has eight FTE: one Director, two Human Subjects Research Coordinators, three Human Subjects Research Specialists, and two administrative support staff. The coordinators’ portfolios are subject-based, with one individual handling social/behavioral protocols and the other focused on biomedical. The responsibilities of the specialists are segregated by function, with one individual assisting the coordinators, a second overseeing continuing reviews, and a third handling exempt protocols. There are two IRB committees on the Urbana campus.

UIUC Institutional Review Board (IRB)

There is confusion on the Urbana campus concerning the role of the IRB Office compared to that of the Institutional Review Board. At the beginning of FY2015, the name of the IRB Office will change to the Office for the Protection of Research Subjects. This name is not only consistent with the name of the UIC office, but it will also allow the office to broaden the scope of its administrative duties (i.e. training, QA/QI, HIPAA oversight, etc.). In the meantime, IRB staff is trying to enhance IRB awareness on campus. Outreach and educational programs take place across campus when requested by faculty members, unit administrators, directors, and/or department heads. The curriculum for an educational training series is in the development phase.
Staff members are also developing guidelines for human subjects research based on best practices, and have created a checklist for investigators submitting protocols for review. The upcoming redesign of IRB Office’s website is also intended to enhance communications efforts and provide faculty with the necessary information and resources.

The number of protocols reviewed by the IRB office has been steadily increasing over the past few years due to the growing amount of biomedical research. It is estimated that the number of protocols submitted to the IRB Office has increased by 12 to 15 percent between approximately 2011 and 2013. The IRB Director noted that it is difficult to track the volume of protocols that are administered by that office due to the absence of an electronic system.

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<th>UIC OPRS</th>
<th>UIUC IRB</th>
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<tr>
<td>New protocol submissions per year</td>
<td>1,200</td>
<td>925</td>
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<tr>
<td>Open/active research protocols**</td>
<td>3,500</td>
<td>2,800</td>
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** Includes exempt protocols.

UIC has entered into an agreement with the Western Institutional Review Board (WIRB) to become the IRB of record for industry-sponsored clinical trials. WIRB is AAHRPP14 accredited and is used by many institutions across the country. Materials submitted for WIRB review are pre-reviewed by a member of the OPRS staff to ensure completeness according to UIC requirements. The number of protocols sent to WIRB for review varies each month. To date, there have been 40 to 50 WIRB approved protocols.

**Process Overview**

*Initial Protocol Review:* OPRS and IRB staff members review all protocols before sending them to the respective campus’ Institutional Review Board for approval. In addition, OPRS reviews protocols submitted to WIRB. The submission timeline (or “IRB review clock”) begins when a protocol is received by OPRS/IRB. An initial pre-review determines if all of the necessary information was included with the submission. The submitted protocols are often incomplete. OPRS and IRB staff attempt to track down any missing information, which results in a delay in the review process. Staff work with the researcher as needed to obtain all required documents before beginning to process the protocol.

IRB staff has the authority to initiate and approve minor protocol changes, while OPRS staff is unable to make any changes to a protocol after it has been submitted. The campus Institutional Review Board reviews all protocols that have more than minimal risk: “The regulatory intent of minimal risk is to define a threshold of anticipated harm or discomfort associated with the research that is ‘acceptably-low’ or ‘low enough’ to justify expedited review or waiver of consent.” UIUC uses an expedited review process15 for any protocols that are no more than minimal risk.

14 Association for the Accreditation of Human Research Protection Programs (AAHRPP) indicates that an organization follows rigorous standards for ethics, quality, and protections for human research. More information is available at [http://www.aahrpp.org/](http://www.aahrpp.org/).
15 More information on the expedited review process is available at [http://www.hhs.gov/ohrp/policy/expedited98.html](http://www.hhs.gov/ohrp/policy/expedited98.html).
On the Urbana campus, the roles of IRB staff are somewhat flexible. If one IRB staff member is absent, another staff member fills in to keep the process going. The initial assignment of protocols to IRB staff for review is based on the staff member’s expertise (i.e. social/behavioral or biomedical, continuing review, or exempt protocol).

Protocols submitted to OPRS/IRB are reviewed on a first-come, first-served basis. On average, it takes less than 2 weeks to complete the IRB review of a protocol. The actual review timeline depends on the completeness and accuracy of the protocol at the time of submission. The Institutional Review Boards on the UIC campus meet twice per month, while the UIUC Board meets once per month. Each Board has a maximum number of protocols to review per meeting, and once the maximum number has been reviewed, outstanding protocols are pushed to the next meeting. Expedited reviews, however, are conducted by members of the Board outside of scheduled meetings.

*Multi-institutional Protocol Review:* The increased emphasis on cross-disciplinary, multi-institutional research initiatives by federal agencies accentuates the need for collaborative research models, including cross-institutional agreement on Institutional Review Board approvals. Ideally, the Institutional Review Board at the lead institution on a sponsored research agreement would conduct the review, which would then be accepted by the partner institution(s). However, local engagement and post-review monitoring is still necessary to ensure compliance with protocols. For example, the university developed a Memorandum of Understanding (MOU) with Carle Hospital located in Urbana. The MOU established the Carle Institutional Review Board as the authority for protocol approval for UIUC-Carle research initiatives involving Carle patients. MOUs are also in place for UIUC research partnerships with UIC, UIS, and the Mayo Clinic. The executed MOU enables the institutions involved to accept protocols reviewed by the Institutional Review Boards of the partnering institution. The UIUC Institutional Review Board is the approving authority for many faculty members engaged in research at other institutions. These authorization agreements are established on a case-by-case basis.

*Protocol-Amendment Process:* There are instances when the Institutional Review Board only approves a portion of a submitted protocol. Investigators are then encouraged to submit an amendment to expand the scope of their research protocol after the research project is underway. The amendment process is used to mitigate lengthy delays and prevent the outright rejection of entire protocols. It provides investigators with additional time to deliver more detailed information on the approach outlined in their protocol without completely inhibiting their research efforts. Investigators can begin hiring necessary staff and make initial purchases, but are not permitted to begin the research component of the project that involves human subjects until all aspects of the protocol, including any amendments, are approved.

**Faculty Feedback**

Faculty identified the preparation and approval processes for protocols submitted to OPRS/IRB and the Institutional Review Board(s) as one of the most burdensome components of research. There are significant issues associated with the inconsistent review of protocols and long delays in approval. In addition to challenges in the protocol review and approval process, the use of human subjects in research requires staff training and continuous monitoring and oversight.
The Institutional Review Board is responsible for ensuring compliance with federal regulations for the review, approval, and oversight of research involving human subjects, but faculty are concerned that the role of the campus Institutional Review Boards goes beyond the federal requirements, which creates barriers to the reasonable conduct of research. Faculty members are often frustrated, faulting the Institutional Review Boards for research delays caused by a rigid application of federal guidelines. Given the severe consequences of non-compliance, there are often conflicts between the interpretation of federal regulations and the findings of institutional audits. This has created a risk-averse environment that can make conducting research difficult. For example, it is difficult to get all institutions involved in a research project to agree upon consent letters, protocols, forms, etc. Reaching consensus is often time consuming, and protocol amendments are required each time a change is made.

The complicated review environment is not compatible with the rising number of cross-institutional research projects. Collaboration requires the coordination of multiple Institutional Review Boards, which is both tiresome and time consuming. The requirement for duplicative reviews and approvals often necessitates reconciling diverse demands from different Institutional Review Boards. Feedback from faculty suggests that the regulatory environment may negatively impact the university’s research portfolio. One faculty member abandoned a project after learning that it required approval from over twenty Institutional Review Boards.

A consent letter recently sent from the UIC Institutional Review Board to the parents of children participating in a research study exemplifies the complex regulatory and approval environment. The 4-page letter contained foreign medical terminology that was difficult to understand and served only to constrain the educational intervention aspect of the study. There are numerous other examples that emphasize the regulatory burden associated with human subjects research.

Despite these challenges, efforts are underway on the campuses to improve the level of support provided to faculty submitting protocols. It was noted that OPRS publishes a monthly newsletter containing tips and trends to assist researchers with their protocol submissions. The newsletter is well received by faculty.

**Staff Feedback**

Feedback from staff indicates that there is limited post-approval monitoring of protocols, which creates a compliance concern. Staff emphasized the need for prospective monitoring of clinical research programs. The investigator has overall responsibility for conducting the research, protecting human subjects, and providing periodic reports and updates related to the research to the Institutional Review Board. It is the university’s responsibility to monitor investigator compliance and site performance. Investigations of noncompliance allegations are burdensome and require extensive OPRS/IRB resources. The regulations do not specify how often investigations are needed, but they should be conducted more regularly than they are currently being done.

At UIC, OVCR and OPRS have a Quality Improvement Program, which assigns individuals to conduct post-approval monitoring and auditing of protocols. Audits may be conducted “for cause,” based upon an issue identified at a Board meeting, or “not for cause,” having been randomly selected for audit by the audit team.
The Vice Chancellors for Research should view post-approval monitoring of IRB protocols as a priority and should provide additional resources as needed.

Additional resources are needed for internal efforts to strengthen IRB-monitoring functions and enhance the overall research administration method. The campuses should allocate funds to support the hiring in OPRS/IRB of dedicated staff with compliance expertise. Additional resources would contribute to the effectiveness of a monitoring program without compromising the efforts of current staff and negatively impacting the timely review of protocols. Furthermore, post-approval QA/QI monitoring, in conjunction with education programs designed to increase awareness in the research community, may ultimately reduce the administrative burden placed on OPRS/IRB and their staff workloads, as ongoing prospective monitoring and education will allow for the earlier identification and correction of discrepancies.

Additional staff resources would also enable OPRS/IRB to proactively engage with faculty. For example, IRB staff attempt to meet with researchers prior to protocol submission to provide feedback on protocols and answer questions about the submission process. Staff members do not always have sufficient time to do this, however, due to increasing workloads and insufficient staffing levels.

OPRS staff noted that a simple oversight on the protocol could mean the difference between an Approval and a Modifications Request from the IRB Office. Since OPRS is a customer service office, staff members prefer to request the missing information from an investigator rather than send the protocol back for revisions. However, if the missing information is significant and the IRB is unable to conduct a review without it, the protocol review is deferred until all of the necessary information is complete.

**Challenges: Training**

Educational resources and programs are an important component of effective human subjects protection. Establishing a consistent offering of both individualized and interactive education sessions, such as seminar series, panel discussions, and workshops, improves the conduct and oversight of research and enhances compliance. Additionally, providing faculty with the necessary training reduces the time OPRS/IRB staff spend answering the same questions repeatedly, and ensures that investigators are aware of new regulations and policies.

The Vice Chancellors for Research should consider providing additional resources to support human subjects research training efforts. In order to create a more consistent approach to training across campuses, the Vice Chancellors for Research should work together to implement formal training programs.

To address the need for training, the IRB Director recommended creating a new position responsible for the coordination of training and educational initiatives. The position would be responsible for educating faculty and departmental business staff, which would help to eliminate common protocol errors and expedite the protocol review process.
Challenges: Information Technology

Acquiring the necessary signatures for approval prior to the submission of a protocol to IRB is a manual process. At UIC, investigators can utilize RiSC Web to upload protocols and obtain some of the necessary signatures required for approval. RiSC Web is an internally developed system created for OPRS to track and manage protocol submissions and coordinate communications sent to investigators. While RiSC Web is available across the campus, it is only used by the Department of Medicine, which agreed to pilot the system. Other departments and units submit a hard copy of protocols to OPRS.

Additionally, the routing of protocols to IRB reviewers is a manual process. Protocols are sent via email or hard copy at various stages of the review process. Reviewers provide comments via email or directly to OPRS/IRB staff, who must then draft status letters to inform investigators of review determinations.

The lack of a comprehensive electronic research administration system impacts the effectiveness of OPRS/IRB. Automating protocol submission and protocol document routing would enhance the efficiency of protocol review activities and reduce overall turnaround times.

An integrated electronic system should be established to route protocols for review and approval and streamline communication between reviewers, OPRS/IRB staff, and investigators. The system should automatically populate basic protocol data into templates, as needed.

Suggested features of an electronic system that would specifically benefit OPRS/IRB include:

- **Smart-form Technology:** Access to an enhanced interface that guides faculty through the protocol submission process would eliminate the need to re-enter basic protocol data that has already been captured in previous submissions. Additionally, creating “mandatory” fields that must be completed prior to submission would reduce the amount of time spent on pre-review of protocols.

- **Electronic Routing of Protocols:** Utilization of an online system to review protocols, modifications, and renewals would increase the transparency of the overall status of a particular protocol. It would also improve communication between OPRS/IRB staff, researchers, and reviewers by eliminating the need for additional follow up via email, since an electronic system can more effectively capture comments and responses. All feedback and revisions could be contained within a single system that automatically associates revisions and modifications with the correct existing protocol record.

- **Reporting Tool:** Data for reporting is difficult to extract and can be inaccurate. Both faculty and the OPRS/IRB staff would like to be able to run web-based customized reports efficiently and quickly.

- **Investigator/PI Dashboard:** Faculty would like a system with transparent workflow that would allow them to have easy access to a list of outstanding items and that would also note what unit or individual is responsible for the next steps and define what those next steps are.
• **Sponsor Information:** Linking sponsor information to each protocol would facilitate audit requests. Federally funded protocols can be audited, but it is not currently feasible to categorize protocols based on funding source. If audited, OPRS/IRB must provide access to all protocols (both federal and non-federal).

Protocols submitted to OPRS/IRB are required to address data security. A university-wide framework is needed for the protection of data to ensure compliance with research regulations governing information security (e.g., HIPAA). Currently, each department, unit, or college may have a different capacity for information security. OPRS/IRB staffs regularly receive questions from faculty regarding adherence to security and privacy protocols. Policies, standards, and procedures are needed to address security and privacy concerns.

**University leadership should establish a unified information security and privacy policy and work with the campuses to implement procedures to address security and privacy concerns.**

4. **Institutional Biosafety Committee (IBC)**

Institutional Biosafety Committees (IBCs) were established through guidelines issued by the National Institutes of Health (NIH) to provide local review and oversight of research utilizing recombinant or synthetic nucleic acid molecules. Many institutional IRBs have also been assigned the responsibility of reviewing research protocols involving biological materials and other potentially hazardous agents.

The NIH Guidelines\(^{16}\) detail safety practices and containment procedures for basic and clinical research involving recombinant or synthetic nucleic acid molecules, including the creation and use of organisms and viruses containing recombinant or synthetic nucleic acid molecules. An institution must follow the NIH Guidelines if it receives any funding from the NIH for research involving recombinant or synthetic nucleic acid molecules. Even if only one research project involving these types of molecules at an institution benefits from NIH support, all such projects conducted at or sponsored by that institution must comply with the guidelines. Also, adherence to the NIH guidelines may be a condition of support from other federal agencies, or even private sponsors.

The IBC on the Chicago campus advises on matters related to the safe handling, transport, use, and disposal of biological materials, including recombinant DNA (rDNA) molecules and infectious agents or toxins. Committee functions are administered through the Office of Animal Care and Institutional Biosafety (OACIB) within the Office of the Vice Chancellor for Research. The goal of the UIC IBC office is to facilitate the protocol writing and review process for the investigator and to ensure compliance of rDNA and infectious agent research with federal regulations.

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The IBC on the Urbana campus serves the same role as its Chicago counterpart. The committee reports to the UIUC Vice Chancellor for Research through the Division of Research Safety (DRS). In addition to overseeing the campus IBC, the Division of Research Safety assists units in identifying and managing biological, chemical, and radiological hazards in order to reduce the risk of harm to the campus community and the environment. Responsibilities include developing campus safety policies and training programs, monitoring emerging regulations, identifying campus compliance requirements, and serving as a liaison with regulatory agencies. In addition, DRS facilitates web-based lab safety training and conducts a safety introduction/orientation for new investigators that is designed to connect them with the appropriate facilities, based on their research needs.

**Staff Roles and Responsibilities**

OACIB and DRS staff facilitate the protocol writing and review process for investigators working with rDNA molecules and infectious agents or toxins to ensure compliance with federal regulations. OACIB and DRS staff coordinate protocol review, notify the investigator of the outcome of protocol review, and work with investigators during the protocol development process.

OACIB currently employs five FTE: one Director, one Associate Director, one Research Technologist, one Administrative Assistant, and one clerical support position. There is currently one vacant position for an ACC/IBC Coordinator. OACIB staff is responsible for the approximately 250 active IBC protocols, 35 of which were submitted in 2013.
The IBC sub-unit of DRS is composed of four FTE, which includes one Associate Director and three Biological Safety Professionals, and one PTE Environmental Health and Safety Technician. Also supporting IBC activities are additional DRS staff members (i.e., Health and Safety Technicians) and staff from other units such as CITES. The UIUC IBC reviews approximately 300 protocols annually. On average, 40 percent of the protocols reviewed each year are new and the remaining 60 percent are updates to existing protocols.
The IBC on each campus meets once per month during the academic year. Each committee’s review timeline, from the project-submission deadline to the IBC meeting, is 25 days. The committees recognize the importance of the timely review of protocols. Most are approved at the first meeting at which they are presented. If a protocol is not initially approved, it is generally because the IBC is waiting for additional information or action from the investigator.

**Process Overview**

Research projects are submitted directly to OACIB or DRS. All materials must be submitted three to four weeks prior to the IBC meeting. This submission deadline was established to allow adequate time for reviewers to assess proposed research projects. Dates are posted on IBC campus websites.\(^\text{17}\)

*Protocol Pre-submission Optional Review:* OACIB staff provides an optional review of the protocol prior to its submission to the IBC, which typically takes place two weeks prior to the submission deadline. There are a limited number of faculty members who take advantage of the pre-review service, and those that do often do not have a well-developed protocol at that stage.

*Protocol Submission Tracking:* Once protocols are received on the Chicago campus, the data is entered into the OACIB database. The database is a Microsoft Access database that is used for tracking protocols. It is not a submission database, nor is it web-based. It is essentially the same as the Animal Care Committee database, but different issues are tracked. Data stored in the OACIB database include personnel information, training dates, project summaries, review categories, and biosafety level (BSL) information. A field will soon be added for biosafety cabinet certifications. The OACIB Director determines which category the protocol falls under based on the scope of work. The various research categories correspond with the NIH guidelines.\(^\text{18}\)

*Protocol Post-Submission Pre-Review:* A pre-review is the next step in the process. At a minimum, the Chair of the Biosafety Committee, a Biosafety Officer from the Environmental Health and Safety Office, and a scientific member of the IBC review the protocol. The scientific member is selected based on the scope of work of the protocol.

*Protocol Review:* Following the completion of the pre-review, all protocols that do not qualify as exempt according to NIH Guidelines are sent to the IBC for approval. The IBC also receives a monthly report that contains a summary of each protocol, other key information, and details on clarifications raised during the pre-review. Protocol approval lasts for five years. However, OACIB and DRS encourage investigators to update their protocols annually or when there is a significant change to experimental protocols, personnel, or facilities.

Neither OACIB nor DRS currently has an annual review process for IBC protocols; however, DRS sends automatic update reminders to investigators after 365 days of inactivity for each

\(^{17}\) UIC IBC submission deadlines are available at [http://tigger.uic.edu/depts/over/research/protocolreview/ibc/meetings.shtml](http://tigger.uic.edu/depts/over/research/protocolreview/ibc/meetings.shtml); UIUC deadlines are available at [https://www.drs.illinois.edu/ibcprojectregistration/](https://www.drs.illinois.edu/ibcprojectregistration/).

registered project. OACIB has plans to implement a process to ensure that the training and certification information on file is accurate and up-to-date.

**Biosafety Audits:** In addition to reviewing protocols, DRS conducts Biosafety Level 2 (BSL-2) audits on the Urbana campus at least every five years. Audits are conducted more frequently if there are significant updates to a protocol, such as changes to procedures or facilities. DRS is in the process of implementing a more comprehensive general lab safety inspection program. Although outside of the purview of the IBC, these general inspections will cover basic elements of biosafety, augment the BSL-2 audits, and improve the coverage of labs working at Biosafety Level 1 (BSL-1).

OACIB and DRS staff members are mindful of a possible site visit from the NIH Office of Biotechnology Activities (OBA), which is responsible for the oversight of NIH-funded recombinant DNA research. The IBC site visit program is one of several OBA initiatives aimed at enhancing compliance with the NIH Guidelines. Site visits involve the evaluation and analysis of institutional systems and processes related to the oversight of recombinant DNA research to confirm fulfillment of requirements under the NIH guidelines and to correct any deficiencies.

**Faculty Feedback**

UIUC researchers are frustrated with the lack of a Biosafety Level 3 (BSL-3) facility on the Urbana campus. Currently, there are no active research programs on campus that require BSL-3 access, but more faculty might pursue research opportunities requiring BSL-3 facilities if they were available. Most major research institutions have a BSL-3 facility, and the UIUC research portfolio is not as competitive without one.

**UIUC should consider establishing a BSL-3 facility.**

Researchers have two primary areas of concern related to biosafety research. First, a significant number of engineering faculty members on the Urbana campus are involved in biology/bioengineering research programs. It is critical that the labs used by these researchers have lab personnel or access to staff with the appropriate expertise required to perform risk assessments and provide biosafety training appropriate for the research conducted. Second, large labs with open layouts such as the Institute for Genomic Biology and the Chemical and Life Sciences Laboratory on the Urbana campus, and the College of Medicine Research Building on the Chicago campus, have office space co-located with laboratory space, which creates a challenge for biological containment. It is important that the faculty and staff who work in these facilities are properly educated and trained in the appropriate biosafety protocols.

**Staff Feedback**

As with other aspects of the research administration process, the primary challenge for OACIB/DRS staff is the timely submission of materials. OACIB encourages investigators to start the protocol process early and to take advantage of available resources. However, many faculty members do not adhere to this recommendation; the majority of protocols are submitted on the day they are due.
The Vice Chancellors for Research should consider providing additional resources to support research safety training efforts.

Feedback from staff indicates that junior investigators have the least support but submit the best protocols. Investigators who have previously conducted research at other institutions often need the most help, as research policies and procedures vary widely by institution. The identification of trends like these can be used to develop targeted training programs and faculty outreach efforts.

**Challenges: Staffing**

As is the case with numerous research administration units across the campuses, there is an insufficient number of staff to provide the necessary level of faculty support. In particular, the UIC Environmental Health and Safety Office would benefit from the addition of an FTE dedicated to biosafety.

The Vice Chancellors for Research should consider evaluating staffing levels and adjusting staffing based on evolving workloads. Campus leadership should also consider ways to recognize the commitment of faculty reviewers.

Faculty participation on campus IBCs is critical. Persuading faculty to serve on the committees is often a challenge. Recognition of faculty participation by campus and university leadership is important to ensure that these individuals feel valued and that others are encouraged to participate in turn. Tenure committees should support a faculty member’s role on IBC or other institutional committees, and these commitments should be recognized during the tenure review process.

**Challenges: Communications**

Although OACIB and DRS have a significant compliance role, the primary function of the units is safety. OACIB/DRS staff assist campus units in identifying and managing hazards to reduce the risk of harm. The role of these units needs to be clearly communicated to the campus community so that researchers understand the breadth of services available. For example, DRS staff is available for consultation as new laboratory space is designed or older facilities are retrofitted. Their involvement from the early stages of planning can prevent future safety issues in poorly designed facilities.

The Vice Chancellors for Research should consider working with OACIB/DRS to clearly define roles for the oversight and review of research subject to NIH Guidelines and to communicate responsibilities, policies, and deadlines to campus departments and units.

On the Urbana campus, DRS works closely with OSPRA to ensure that materials used in research are appropriately registered. Additional unit partnerships should be considered.
OACIB/DRS should explore opportunities to partner with campus units to identify ways to promote a campus-wide safety culture.

Challenges: Training

As units under the Vice Chancellors for Research, OACIB/DRS are dedicated to supporting research on the campuses, and suggest that there are aspects to consider in addition to biosafety.

The campuses should consider ways to emphasize the importance of safety. Training across the safety spectrum (e.g., biological, chemical, radiation) that includes more than an overview of good laboratory practices is needed. The development of safety policies and an understanding of emerging regulations are important aspects of a comprehensive safety program.

Although each campus unit is responsible for its own safety and day-to-day compliance activities, leveraging OACIB/DRS expertise to educate faculty can help campus units to understand and comply with applicable regulations. Mandated training requirements are not always well received by faculty, but a stronger emphasis on safety is needed. For example, researchers working with bloodborne pathogens must attend an annual training session. It is not feasible to present all of the necessary information in a single session. OACIB/DRS would like researchers to attend a second course, but there must be adequate high-level administrative support to encourage faculty to do so.

Campus leadership should consider establishing training goals for faculty and staff and incorporate those goals into annual performance review metrics.

Challenges: Information Technology

Information technology can increase the efficiency of the protocol review process and reduce the amount of time it takes to approve a protocol. Inaccurate or missing protocol information is a challenge and can delay the review of a protocol by the IBC.

The most common protocol submission errors include:

- Incomplete or missing information
- Incorrect dates
- Missing certifications
- Insufficient or non-existent responses to form questions

The implementation of an electronic system could eliminate many of these issues. Additionally, the PI Dashboard mentioned previously would provide real-time information to faculty on the status of their protocols.

In January 2010, DRS launched an online protocol registration system. The system is capable of integration with a larger research administration system.
5. Institutional Animal Care and Use Committee (IACUC)

An Institutional Animal Care and Use Committee (IACUC) is a self-regulating entity that, according to federal law, must be established by institutions that use laboratory animals for research or instructional purposes. The UIC and UIUC IACUC were established in accordance with the:

1. Animal Welfare Act\textsuperscript{19}, which is administered by the U.S. Department of Agriculture through the Animal and Plant Health Inspection Service (APHIS)
2. PHS Policy on Humane Care and Use of Laboratory Animals\textsuperscript{20}

The IACUC oversees and evaluates all aspects of the university’s animal care and use program and ensures compliance with all laws, regulations, and policies governing the care of research and teaching animals. The primary function of the IACUC is to provide oversight and assistance in ensuring compliance. Every research project involving the use of a live vertebrate animal must be approved by the IACUC prior to initiation.

The IACUC at UIC is known as the Animal Care Committee (ACC) and is administered through the Office of Animal Care & Institutional Biosafety (OACIB) within the Office of the Vice Chancellor for Research. The UIUC Associate Vice Chancellor for Compliance within the Office of the Vice Chancellor for Research oversees the IACUC on the Urbana campus.

Staff Roles and Responsibilities

The ACC office within OACIB employs three dedicated FTE: one Director, one Assistant Director, and one Departmental Information Supervisor. Additional shared staff members within OACIB support the ACC employees. The ACC/IBC Coordinator position is currently vacant. The office accepts all protocol submissions, coordinates protocol review for the nine-member committee, and works with investigators throughout the protocol process.

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\textbf{UIC Office of Animal Care & Institutional Biosafety}


Four FTE support the 19 member IACUC on the Urbana campus: one IACUC Chair, two Specialists, and one Office Support Specialist. In addition to protocol review, IACUC staff conduct inspections of all campus animal facilities every 6 months.

The UIUC Division of Animal Resources (DAR), also a unit within the Office of the Vice Chancellor for Research, works closely with the IACUC. DAR provides high quality care, training, and consultation in the safe, humane use of laboratory animals in research and education in compliance with federal regulations and campus policies.

Similar to DAR, the UIUC Agricultural Animal Care and Use Program (AACUP) works closely with IACUC to ensure the well-being of agricultural animals used in research and teaching. Dedicated IACUC employees facilitate protocol approval on the Rockford and Peoria medical campuses, as well as IRB and IBC staff.

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<th>UIC ACC</th>
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<tr>
<td>New protocol submissions per year</td>
<td>275</td>
<td>300</td>
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<tr>
<td>Modifications per year</td>
<td>1,000</td>
<td>1,000</td>
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<tr>
<td>Open/active research protocols</td>
<td>750</td>
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At UIC, the ACC/IACUC is responsible for the review and approval of all research protocols using animals in campus facilities or conducted by faculty, staff, or students.

The Chicago and Urbana campuses are accredited by the Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC), a private, non-profit organization that promotes the humane treatment of animals in science through voluntary accreditation and assessment programs. Additionally, the UIUC agricultural animal facilities are accredited. Most institutions do not have both laboratory and agricultural animal facility accreditation, which sets UIUC apart from its peers.

**Process Overview**

Investigators conducting research that involves animals must receive approval from the ACC/IACUC before initiating research. However, approval is not required to submit a grant proposal that includes animal research.

*Partial and Just-in-time Submission:* NIH policy allows the submission of certain elements of a competing application to be deferred for certain programs and award mechanisms. These elements, which include the verification of IACUC approval, can be submitted just-in-time by the applicant. Many investigators do not submit protocols to the ACC/IACUC until the just-in-time notice is received.

On the Chicago campus, the full Animal Care Committee (ACC) is composed of a chair, the veterinarian with programmatic responsibility, the chairs of the respective subcommittees (scientists), a non-scientist, an unaffiliated member, and at-large representatives from the Health Science Center and the East Campus. There are three subcommittees, including small animal, primate/exotic/large animal, and teaching; the subcommittees conduct the initial protocol review. Each subcommittee comprises faculty from various disciplines, most of which are junior faculty, as well as postdoctoral students from the College of Veterinary Medicine.

*Protocol Post-Submission Pre-Review:* First, the ACC administrator reviews the proposal and decides which protocols to send to one of the subcommittees for review. ACC employees conduct pre-reviews when requested by the investigator prior to official submission. According to federal regulations, a veterinarian must be involved with the review process. A UIC faculty member with a Doctor of Veterinary Medicine (D.V.M.) conducts the initial protocol review. The protocol is then sent to another clinical veterinarian for a second level of review.

*Protocol Review:* All submitted protocols are reviewed at the monthly meeting of the ACC. Approximately 25 to 30 protocols are reviewed at each meeting. The ACC approves, requests clarification, defers, or rejects each protocol. It is rare for a protocol to be rejected the first time it is reviewed. The ACC office sends each investigator a decision letter within 3 days of the committee meeting, providing the status of the protocol.

*Protocol-Amendment Process:* Approved protocols have a lifespan of three years. Any change to a protocol must be submitted as an amendment, including changes in procedures (e.g., new species, strain of species, experimental protocol, etc.) or the individuals involved in the research. All amendments require review and approval, but the nature of the change to the protocol
determines if the amendment must be approved by the ACC/IACUC. Protocol changes that have no impact on the welfare of the research animals are reviewed and approved by ACC/IACUC office staff and do not require committee approval.

The protocol process increases in complexity when there are external partners or research facilities. For example, investigators conducting university-funded research at the VA Medical Center in Chicago must submit protocols to the ACC for approval, but all amendments are reviewed and approved by the hospital. An umbrella protocol is often put in place for outsourced activities (e.g., subcontracting some or all of the animal work).

*Mandatory Training Prior to Protocol Approval:* Prior to the start of any animal activity, all investigators, faculty, research staff, and students involved in the research project are required to complete training. Protocols are not approved unless all personnel listed on the protocol have completed the required training. Additionally, personnel will not be added to previously approved protocols unless training has been completed.

On the Chicago campus, the animal research training requirement can be completed as follows:

1. Online training module: *Animals and Research at UIC – What Do Investigators Need to Know and Why?*
2. Seminars, which are offered only by special request and based on time and availability
3. Enrollment in the Occupational Health and Safety Program
4. Orientation with one of the veterinarians, required to gain access to research facilities

To participate in activities using animals on the Urbana campus, individuals must complete the following training requirements:

1. Online training module: *Basic Training Program for Animal Users*
2. Enrollment in the Occupational Health and Safety Program, which includes online training and completion of a risk assessment form
3. Biological Safety Training (depending on the project)
4. Additional optional training:
   - *The Life of a Protocol:* an online overview of the IACUC protocol submission and review process
   - In-person training presentations by IACUC staff, which can be arranged through the IACUC office
   - Procedure or species-specific training, provided by DAR or AACUP veterinary staff upon request

For joint research projects with other institutions, the non-UI investigator must be listed on the protocol, but he/she does not need to complete training.
Staff Feedback
Timely proposal submission continues to be a challenge. Many investigators submit their proposals to ACC/IACUC only days before the committee review, or in the case of NIH-funded research, when they receive the just-in-time notice of an award. In both instances, late protocol submission does not allow enough time for thorough review.

Urbana-campus IACUC staff members note that they are overworked due to being a small staff with a demanding workload. Implementing standard operating procedures would decrease review time and increase efficiency.

Challenges: Staffing
UIUC IACUC recognizes that it does not have enough staff to conduct much-needed post-approval monitoring. Additional staffing resources would allow for annual laboratory visits to review procedures and evaluate the need to update protocols and answer questions.

The Vice Chancellors for Research should view post-approval monitoring of IACUC protocols as a priority and should provide additional resources as needed.

There is a concern that researchers may view post-approval monitoring activities as policing rather than precautionary. To mitigate this concern, an additional IACUC Specialist is needed, rather than an individual dedicated to post-approval monitoring. This would allow all IACUC staff to devote more time to post-approval follow-up and to develop relationships with investigators and research personnel, which would enhance compliance without the perception of an audit function.

Challenges: Training
The primary reason there are issues at the time of protocol submission is due to non-compliance. It appears that investigators are not always familiar with their protocols or subsequent modifications. There are a variety of policies and guidelines available online that an investigator should consult while conducting research. Investigators should be made aware of the resources available and encouraged to use them. The combination of good mentoring and training can be very effective.

ACC/IACUC should develop a communications strategy for sharing information with researchers and departmental business staff.

Challenges: Information Technology
Similar to other aspects of research administration, the manual submission of protocols is inefficient and burdensome. On average, it takes three to four weeks to turn around a protocol after it has been submitted to ACC/IACUC. The implementation of an electronic system that automates protocol submission and document routing for review would make this process more efficient and minimize the time before a protocol is approved and research can begin.
An integrated electronic system should facilitate the routing of protocols for review and approval and streamline communication between reviewers, ACC/IACUC staff, and investigators. The system should automatically populate basic protocol data into templates, as needed.

Incomplete protocol information is the most common reason that protocol approval is delayed. A majority of proposals are returned to the investigator because additional clarification is required. An electronic system could eliminate a significant number of the requests for clarification through the use of dynamic forms, which would reduce the number of unanswered questions and minimize inconsistent information.

The UIUC IACUC utilizes a system that was recently developed internally and is managed by a programmer who is remotely based. Investigators will eventually be able to submit protocols, amendments, and annual review materials as well as easily renew active research protocols. The system is linked to IBC protocols and will have a mechanism for notifying Animal Care and Use Program units of pending protocols that require review.

One university researcher noted that the IACUC website is frequently updated, resulting in periods of time during the workday that the site is unavailable. An electronic system that performed automatic updates during non-workday hours would increase efficiency for IACUC staff and researchers.

6. Conflict of Interest

External activities that enhance academic staff members’ professional skills or constitute public service can benefit the University as well as the individual. However, because such activities can lead to conflicts of commitment or interest, they must be disclosed and monitored. Conflicts can occur as a result of the type and scope of activities engaged in by the university and its faculty and staff.

An essential part of ensuring research integrity is managing conflicts of interest that may bias the design, conduct, and reporting of research. The University of Illinois is committed to protecting objectivity in research and ensuring compliance with federal guidelines promoting objectivity in research. Compliance with these requirements is a condition for submitting proposals and accepting sponsored research awards from federal agencies, including the National Science Foundation (NSF) and the National Institutes of Health (NIH).

The annual Report of Non-University Activities (RNUA) is the university process for managing real or perceived conflicts. RNUA is a process by which academic staff members disclose and obtain prior written approval for non-university income-producing activities or activities that might conflict with an individual’s university responsibilities. The UIC and UIUC Vice

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21 Academic staff is a designation that includes academic professionals, postdoctoral associates, and the faculty ranks of professor, assistant professor (and all of the foregoing whose appointments contain such terms as “research,” “adjunct,” “visiting,” or “clinical”), instructor, and lecturer. Civil service staff, students, and medical residents (unless also employed as academic staff members) are not required to submit an annual RNUA. However, they are not exempted from making disclosures as required by federal or state laws and regulations or from making situation-specific disclosures as described in the University Policy on Conflicts of Commitment and Interest.
Chancellors for Research are the campus officials responsible for annually informing academic staff of the University Policy on Conflicts of Commitment and Interest and implementing any associated training required by law. Each office has designated staff responsible for conflict matters and the oversight of related activities. UIC has created a Conflict of Interest (COI) office to provide oversight on the Chicago campus.

Effective August 24, 2012, the Department of Health and Human Services (HHS) issued a new regulation on financial disclosure for Public Health Service (PHS)-funded investigators. This regulation requires additional financial disclosure and training for anyone involved in the design, conduct, and analysis of PHS-funded research. Additionally, some non-PHS sponsors have adopted this policy. Since August 2012, UIC has received 896 financial disclosure forms; approximately 1,100 financial disclosures have been submitted at UIUC. Implementing these new rules and requirements has exacerbated the already significant challenges in ensuring compliance with federal regulations and policies. With each new regulation or federal requirement, the university must implement new policies and procedures to address both the investigator’s responsibilities and institutional obligations, including increased reporting and monitoring of research activities.

**Staff Roles and Responsibilities**

There are two FTE in the UIC COI office: one Director and one Coordinator. The COI office manages the annual RNUA on the Chicago campus. Approximately 6,500 RNUA forms are submitted for review each year; on average, 1,000 RNUA forms are routed to the COI office.

There are two FTE within the UIUC Office of the Vice Chancellor for Research (OVCR) designated to handle conflict matters: one Executive Associate Vice Chancellor for Research and one Research Regulatory Coordinator. The OVCR manages the annual RNUA on the Urbana campus. Approximately 7,000 RNUA forms are submitted for review each year and on average, 600 of these forms are routed to the OVCR.

**Process Overview**

*Conflict Form Collection and Follow-Up:* The OVCR/COI office collects and manages all conflict forms on the campuses, including RNUA. Follow-up is only required on forms where activities were disclosed that represent a perceived or real conflict. Forms are reviewed for completeness. Staff members also review the description of responsibilities or duties for disclosed activities to ensure that the information provided complies with university policy requirements. On the Urbana campus, this review primarily occurs in the home units.

*Chicago-Campus Just-in-time Conflict Management Review:* On the Chicago campus, when an investigator answers “yes” to the COI question on the Proposal Approval Form, staff inform the COI office that follow-up is required. The COI office sends a template email notifying the investigator that a just-in-time process is followed for competitive awards. If the investigator is soliciting an industry-sponsored award, COI staff typically start drafting a management plan at

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22 The University Policy on Conflicts of Commitment and Interest is available at [http://research.uillinois.edu/coci/coci-policy](http://research.uillinois.edu/coci/coci-policy).

the time the notification is received. The COI office uses a just-in-time model for competitive awards, because, on average, 60 percent of grant proposals submitted by UIC faculty are not funded. At the time of proposal submission, the investigator is informed that he/she should contact the COI office after a proposal score has been received or there is tangible evidence that the proposal will likely be funded. At this time, the COI office will begin working with the investigator to develop a conflict management plan. If the investigator is conducting research involving human subjects, COI staff develops a plan that satisfies the conflict management requirements for both the sponsoring agency and for research involving human subjects. There is an expedited review process for conflict management plans for investigators conducting clinical trials. Once the conflict management plan is approved, COI staff notifies ORS of the status and note the approval date in the UIeRA system.

Since 2010, roughly 220 conflict disclosures have been submitted using the PAF on the Chicago campus. The process on the Urbana campus is slightly different. The preparation of a conflict management plan is typically initiated by faculty or staff, at the request of a unit head or dean, in preparation for the licensing of IP by a faculty or staff startup company, or in preparation for a subaward to the University from a faculty or staff startup. Occasionally investigators will disclose a new COI when a proposal is submitted, but that is not the route for investigation of most COI.

**Conflict Appeal Process:** When activities are denied, the COI staff follows up with the employee’s home department or unit to assure that the appropriate review process for denied activities was followed (i.e., that the employee was notified and provided with an opportunity to respond before the review was escalated to the next level). Staff also confirm that the Unit Executive Officer responsible for reviewing disclosed activities has provided an adequate justification as to how any potential conflicts will be managed or eliminated. OVCR staff at Urbana are available for consultation in the event activities are denied, but generally do not monitor these situations unless they become aware of a question or concern.

**Conflict Management Plans:** Conflict management is situation specific, and the development of a management plan is an ongoing process. Management plans are required if university intellectual property is licensed by a faculty startup company. At a minimum, the plan must specify the work or research that is completed on behalf of the university and of the company. A Conflict Review Committee (designated by the employee’s Unit Executive Officer and comprised of faculty or staff members of equal rank) reviews the conflict management plans for all startup companies prior to license execution. The committee serves in an advisory role to the Vice Chancellor for Research. Currently, there are approximately 30 active and pending management plans for UIC faculty and staff.

The majority of conflict management plans on the Urbana campus are connected with faculty startup companies. A conflict management plan is required before technology developed at the university is licensed to a faculty startup company. As a result, many plans are developed independently from the proposal process. This minimizes the time it takes to submit an SBIR, STTR, or other proposal that is connected with a startup company. Urbana has approximately 100 active COI management plans. Many of the plans are handled administratively, and only plans with new COI issues or policy questions are taken to the Conflict Review Committee.
If the investigator is conducting research involving human subjects, IRB conducts a separate review of the proposed conflict management plan and has final jurisdiction. The COI office has recorded 402 conflict disclosures submitted on UIC IRB applications since 2007. Very few conflicts are disclosed on UIUC IRB applications. When COI issues are discovered relating to an IRB protocol, the OVCR works with the IRB office to create a management plan and resolve issues.

**Faculty Feedback**

The mere existence of a potential conflict creates challenges for faculty. Feedback from faculty emphasized the significant burden associated with disclosing and managing potential conflicts. For example, a UIC faculty member worked with the COI office to develop a plan to manage a 50 percent ownership in a start-up company. Additionally, this individual submitted 23 grant proposals in a single year and each required a conflict management plan to be submitted. The time spent submitting numerous conflict management plans was overwhelming and burdensome, and the faculty member’s perception was that the university requires faculty to prove that they are ethical with each submission. As such, the faculty member no longer conducts research that involves the start-up company. To prevent potential conflicts, the faculty member now conducts all company-sponsored research off-site; it is no longer part of this individual’s UIC research portfolio.

**In order to create a more consistent and streamlined approach to managing conflict-of-interest processes across campuses, the Vice Chancellors for Research should work together to evaluate policies and procedures.**

Faculty also cited examples of investigators resigning from corporate Boards of Directors due to burdensome conflict disclosure and management requirements. One faculty member noted that it was not possible to “to construct a management plan that made any sense,” so this individual felt forced to resign from a board on which he/she served.

Faculty also identified as a challenge inconsistencies in the interpretation of university conflict-of-interest policies. For example, it is not clear if faculty on 9-month appointments must report salaries paid by grant funds or external activities conducted during the summer months.

**Staff Feedback**

OVCR and COI staff recognize that the conflict of interest policies and procedures are burdensome, but note that faculty often create obstacles to their fulfillment. The staff perceive faculty as reluctant to change and unwilling to devote time to administrative tasks, including the time required to understand the impact of potential conflicts or non-compliance on the institution. Both the university and individual faculty and staff members can receive fines, penalties, or other sanctions as a result of violating state or federal regulations. Additionally, improperly managed conflicts leave the university vulnerable in the court of public opinion. Negative publicity reduces morale, discredits the university’s research and teaching efforts, and impacts recruiting efforts, among other things.
UIUC OVCR staff indicated that a common challenge they experience is pushback from investigators on whether an activity should be disclosed. The OVCR primarily interacts with investigators who have started companies or have equity in a start-up company. There are several different situations worthy of increased scrutiny, and investigator relationships with startup companies are one such example. Generally, faculty with equity in startup companies have a conflict management plan in place, but often the plan does not address requirements specific to NIH funding. OVCR staff will work with the investigator and the unit head to revise the management plan, but it can take a significant amount of time to make changes to the plan and solicit the necessary approvals. In an effort to make the process more efficient, OVCR staff attempt to simplify management plans and include a mechanism for conflict management or oversight that is easily feasible. For example, management plans rarely require frequent meetings of the Conflict Review Committee or extensive time tracking or activity logs.

According to university policy, the unit head holds primary responsibility for working with faculty to manage conflicts. OVCR/COI offices do not have a process in place to regularly monitor faculty management plans unless the conflict is considered to be high-risk. In these situations, OVCR/COI staff will confirm that the necessary committee meetings take place to ensure that the conflict(s) is managed appropriately.

OVCR and COI staff recommend that faculty work with a coordinator in the unit when disclosing potential conflicts. The OVCR/COI coordinator can assist with the disclosure forms and complete a majority of the necessary paperwork, thereby reducing the burden on the faculty member.

**Challenges: Communication**

Ineffective communication contributes to the complexity of conflict-of-interest processes. Research faculty and staff find the policies and procedures for reporting and disclosing possible conflicts confusing. It is not always clear what activities should be disclosed and when disclosure is required. For example, for reporting and review purposes, conflicts of commitment only occur during the contract period, but conflicts of interest can occur beyond the contract period. This is important since a majority of faculty members are on nine-month appointments. Requirements need to be clearly communicated.

**OVCR/COI should develop and document a communication strategy for sharing information with researchers and departmental business staff.**

Currently, it is the responsibility of the investigator to complete the necessary training at the time of proposal submission. However, training is not tracked or confirmed when a proposal is submitted. This does not become an issue until the notice of grant award is received. There are opportunities, however, for ORS/OSPRA staff to reach out to investigators throughout the proposal process, including during proposal development, when just-in-time funding notifications are received, or when grant anticipation accounts are requested. These are opportunities to communicate the training requirement to the investigator and encourage him/her to submit the necessary conflict disclosure forms and complete the training as soon as possible to avoid delays in conflict approval or management.
OVCR/COI staff should work with ORS/OSPRA to establish methods for sharing information on conflict-of-interest policies and training requirements throughout the proposal process.

It is up to a faculty member’s judgment as to whether an activity represents a potential conflict with their university responsibilities. There are numerous federal and state regulations that determine disclosure. In an effort to simplify the process, comprehensive reporting of all outside activity or interests should be encouraged. A conflict itself is not necessarily a bad thing, but an unmanaged conflict can have devastating consequences. Consistent messaging is needed. Most “real” and almost all “apparent” conflicts can be managed. It is the responsibility of the unit or department head to communicate the importance of disclosure to faculty and staff.

**Challenges: Training**

Insufficient training of faculty and staff, as well as of the department and unit heads responsible for the review and approval of conflict matters puts the university at risk for non-compliance with state, federal, and other conflict-of-interest regulations. Although some training and resources are provided by the OVCR/COI office, existing materials do not include significant coverage on the importance of disclosure or effective conflict management techniques. Additionally, training has not been consistently provided to or attended by unit executive officers (i.e., department and unit heads).

**The Vice Chancellors for Research should consider providing additional resources to support conflict-of-interest training.**

In conflict situations involving startup companies, for which formal conflict management plans are often developed, OVCR and COI employees provide guidance on a case-by-case basis. However, for conflicts not requiring a formal plan, management decisions are made by unit executive officers. Additional training and resources are needed to assist unit executive officers in the review and approval of disclosures and in the implementation of appropriate conflict management mechanisms.

Faculty members have also expressed concerns regarding recent changes to federal conflict regulations, specifically the PHS guidelines for disclosure of significant financial interests. The OVCR/COI offices have developed online resources that address frequent questions from faculty and provide additional information on the recent changes to the federal guidelines. OVCR and COI staff has also held training sessions specific to the new PHS reporting requirements. COI staff members have trained 1,287 research personnel on the Chicago campus since last August, and OVCR staff members have trained more than 1,400 research personnel on the Urbana campus.

**Challenges: Information Technology**

Similar to other aspects of research administration, a majority of the conflict-of-interest process is manual and time intensive. Implementation of an electronic system would facilitate conflict-of-interest notification, disclosure, and tracking.
An integrated electronic system should facilitate the routing of forms for review and approval of potential conflicts and streamline communication between reviewers, OVCR/COI staff, and investigators. The system should automatically populate basic form data into templates, as needed.

Additionally, handling the management of all conflict disclosures in a central system would reduce the amount of time OVCR/COI and unit staff members dedicate to processing disclosures and allow more bandwidth for individualized counseling and faculty engagement. Electronic disclosure submission and tracking would enhance the efficiency of conflict review activities and improve the transparency of the review status. An electronic system would also improve the accuracy and completeness of records, which would help to eliminate shadow systems that do not interact with other pre- and post-award systems.

An electronic system can help to reduce the faculty burden associated with managing conflict of interest disclosure. Faculty would no longer need to update multiple disclosure types, given a system that automatically populates conflict disclosures and incorporates into conflict disclosures those activities disclosed in the annual RNUA process. The system would also reduce the burden on OVCR/COI staff, who cross-check this information, and on conflict reviewers, who would now have access to information about any other conflict-related activities as they review a disclosure.

7. Award Setup
In order for an investigator to begin spending on a sponsored award, an account must be established, whether through the receipt of an award document or a request for pre-award spending. The award document is an official agreement that governs the conduct of the project and may be in the form of a grant, contract, or cooperative agreement.

ORS is responsible for award setup on the Chicago campus and the OSPRA Negotiation team is responsible for processing awards on the Urbana campus. ORS/OSPRA staff review each award document to determine its acceptability under federal and state laws and regulations, sponsor guidelines or terms and conditions, and university policies and procedures. ORS and OSPRA work closely with the OBFS Office of Grants and Contracts (GCO) on each campus. The GCO supports the post-award administration of grants and sponsored projects.

Staff Roles and Responsibilities
ORS and OSPRA staff responsible for award processing review all award information and documentation (e.g., proposal documents, budget, PAF/PTF, email correspondence, compliance concerns, subawards, cost share, reporting requirements, federal pass-through funds, etc.).

GCO staff is tasked with award administration based on the source of funding. Staff portfolios are as follows:

- Federal: National Science Foundation (NSF)
- Federal: National Institutes of Health (NIH)
- Federal: Miscellaneous
  (Includes over 30 small to medium-sized federal agencies, such as the Air Force and other branches of the military, the Department of Agriculture, the Department of Energy, and the Department of the Interior)
- State of Illinois agencies/departments
- Private sponsors

UIC ORS has two FTE who are responsible for award processing and one FTE who coordinates reporting. ORS staff process approximately 1,150 awards per year, which includes around 200 new federal awards, 700 modifications, and 150 no-cost extensions.

UIC Office of Research Services (ORS)
OSPRA is currently understaffed, which impacts the assignment of awards and staff award portfolios. The review of an award is assigned to the next available award administrator when the notice of award is received. OSPRA would eventually like to transition to a model that is more closely aligned with the proposal submission process, making staff members responsible for specific departments.
**Process Overview**

ORS and OSPRA are the authorized university offices that receive and accept award notices on behalf of the university. If an investigator receives a notice of award directly, they should forward it to ORS or OSPRA. Typically, the award notice contains information about the amount of funds obligated, the time period for performance, and the scope of work. In addition, it provides information about the terms and conditions associated with the award.

**ORS/OSPRA Award Review:** ORS/OSPRA review, negotiate, and accept the sponsored award. Prior to award execution, ORS/OSPRA staff match the award documents with the corresponding UIeRA record, confirm that all compliance materials are complete and any training requirements are fulfilled, and review all other documents and materials associated with the award. Staff consults with the investigator, departmental administrators, and GCO throughout the award review process. On the Urbana campus, the award negotiator prepares a review sheet summarizing negotiation points and details of the award. The review sheet is useful both to the management staff providing an authorizing signature on behalf of the Board and to the processing staff inputting the award data into the UIeRA system. Once the fully executed award is prepared, GCO assumes responsibility for award setup.

**GCO Award Review:** GCO staff members review all award information and documentation (i.e. proposal documents, budget, proposal transmittal form, email correspondence, compliance concerns, subawards, cost share, reporting requirements, federal pass-through money, etc.). The last thing reviewed is the start date. If the start date will not work with the project, GCO contacts OSPRA about negotiating a new start date. A change in the start date affects reporting.

**Electronic Systems Award Management:** Once all of the information is obtained and in place, GCO interfaces data through a process in UIeRA and then manually enters additional information (i.e., billing information, cost share) into Banner. Note: Information that is interfaced is initially entered by OSPRA Specialists upon receipt of the proposal.

ORS, OSPRA, and GCO staff members communicate regularly on issues that arise, such as anticipation requests and allowable costs. Urbana units are located in the same building, which helps facilitate communication. Chicago units are located three blocks away from each other.

**Internal Award-Acceptance Notification:** At UIC, once the award document is approved and accepted, a congratulatory email from ORS is sent to the investigator and other project personnel, as well as to the GCO, specifically to a GCO inbox: gcosetup@uillinois.edu. Following receipt of this email, GCO sets up the account in Banner within 10 business days and facilitates the post-award administration.

**Post-Award Process Initiation:** At UIUC, once the award document is approved and accepted, a congratulatory email from the Associate Vice Chancellor for Research/Director of OSPRA is sent to the investigator and other project personnel. When the award documents are fully executed, an award document packet is forwarded from OSPRA to GCO. This action begins the award setup process and post-award administration. Note: GCO is not copied on the congratulatory email from the Associate VCR.
**Anticipation Accounts:** UIC units are encouraged to establish an anticipation account after approval has been given by the funding agency for an award. It is often appropriate to make staff appointments and incur other expenses prior to the formal notification of an award by the sponsor. Most federal agencies allow pre-award costs for 90 days prior to the formal start date of a grant, provided that incurring these costs is in the best interest of the project. The use of anticipation accounts minimizes the volume of cost transfers for the project. However, the academic unit bears the responsibility for charges on an anticipation account if the award is delayed or not received. UIUC does not recommend the use of anticipation accounts, but does not actively discourage their use.

**Faculty Feedback**
Faculty members believe that the transition from pre-award to post-award should be seamless and efficient. The various aspects of award administration and compliance requirements are often confusing for faculty.

GCO should provide investigators with an award setup checklist that highlights their respective tasks and the timeline for completing them. Additionally, GCO should conduct an “entrance interview” with the investigator and unit staff to review the checklist.

According to faculty, the primary challenge associated with award setup is external to the university. Sponsors do not always provide notices of award in a timely manner. Since the entire award setup process is contingent on notification from the sponsor, research is often delayed. Faculty suggested that the GCO should expedite the creation of the grant accounts process as much as possible.

**OBFS leadership should evaluate award setup processes and consider the implementation of appropriate process improvements.**

**Staff Feedback**
The research regulatory landscape is continuously changing, requiring more time and resources to meet the requirements of sponsors. With each new regulation or policy requirement, new procedures are required, which usually results in the increased reporting and monitoring of research activities. Additionally, the entire process for submitting applications and reporting for grants has moved from paper to electronic formats, which, despite obvious advantages, has required research administration units to develop new operational practices. Changing business operations while integrating new guidelines has exacerbated the already significant challenges in ensuring compliance with federal regulations and policies.

For example, the additional training and reporting requirements stemming from the updated HHS regulation on financial disclosure for PHS-funded investigators has increased compliance monitoring efforts. All new investigators must complete training before engaging in PHS-funded research, and all investigators currently involved in PHS projects must complete training prior to renewal or continuation. ORS/OSPRA staff work closely with the OVCR/COI office to
ensure that all PHS-funded investigators fulfill the necessary training requirements. Additionally, all PHS investigators are required to disclose any Significant Financial Interests (SFI) that might reasonably appear to be related to the investigator’s institutional responsibilities. SFI disclosure issues can delay award processing. The primary cause of the delay is incomplete disclosures. Although the investigator is ultimately responsible for disclosure, ORS provides a weekly report to the COI office in an effort to keep the process on track. It is important that investigators complete the PHS disclosure during the proposal submission process to prevent delays in award setup.

**Challenges: Training**
To be most effective, the university must promote a shared understanding of its policies and procedures. GCO has placed a large emphasis on staff training, including staff within its units as well as departmental staff.

Although training opportunities exist, too often the investments GCO makes in training its staff are not returned to the unit because of a high turnover rate. Moreover, departmental business managers often seek out contacts with specific individuals rather than with the office in general because many GCO staff do not have adequate knowledge and expertise. Faculty and departmental staff are often frustrated when they receive inconsistent answers and when GCO staff members are unable to adequately explain policies or procedures. The training of staff has been recognized as critically important; however, there have not been significant enterprise-wide training efforts.

A new position in GCO was recently created to develop and implement a formalized training program. The Assistant Director of Award Administration Training develops training resources on the administration and expenditure of sponsored project awards to provide GCO staff with the in-depth knowledge required to adequately support faculty-research efforts.

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**University leadership should provide additional resources for the development of an enterprise-wide sponsored projects training program, as well as support the creation of dedicated positions responsible for the oversight of training efforts. A university-wide training program should be part of larger research administration efforts.**

On the Chicago campus, ORS and GCO developed a mandatory training program for NIH K award recipients. These awards are designed to promote intensive development in the biomedical, behavioral, or clinical sciences leading to researcher independence. K awards typically require 75 percent commitment of full-time professional effort. Effort reporting on K awards has been problematic for institutions. This new training program supports compliance with effort reporting requirements.

On the Urbana campus, GCO is currently working with OSPRA to develop a formal training program for pre-award activities; it is scheduled to launch in September 2014. GCO has also initiated “meet and greet” sessions in an effort to connect with campus researchers and departmental administrators. In addition to offering online and in-person training resources for investigators and departmental staff, the grants and sponsored projects website provides links to
information, regulations, policies, and forms to help campus units with the administration of their grants and sponsored projects.24

**Challenges: Information Technology**

The transition from pre-award to post-award is primarily a manual process that is redundant and labor intensive. ORS and OSPRA staff enter the award information in ULeRA during proposal submission. GCO staff review the ULeRA record when the notice of award is received, interface data through a process via ULeRA, and then manually enter additional information in Banner. Billing and cost share information are also added. Ideally, the implementation of an electronic system would help to streamline processes, automate the communication of award acceptance to internal stakeholders, and make the transition more efficient.

An integrated electronic system that connects pre- and post-award functions should reduce duplicate data entry. The system should automatically exchange account data with Banner.

Matching incoming awards to anticipation accounts also presents challenges. Anticipation account data are not consistently provided to ORS/OSPRA, and manually-entered account data in ULeRA is documented erratically. An electronic system should automatically pull anticipation account data from Banner.

**8. Subcontracts**

Collaboration with other investigators is an important aspect of a research project. There are times when an investigator may wish to collaborate with other institutions or entities to complete a portion of a sponsored project. A subaward is one of several forms of agreement issued by the university that delegates a portion of the prime award’s funding to a third-party organization to fund its completing a portion of the work on a sponsored project. A subcontract is the written agreement that outlines the details of the arrangement and facilitates the distribution of funds to the third party or subcontractor. The terms “subaward” and “subcontract” are often used interchangeably. For the purpose of this report, a subaward is an agreement in which the university is the pass-through entity using funds it received from a prime sponsor, and a subcontract is an agreement with a third party that is external to the university that performs a portion of the research associated with a grant award.

Subcontracts differ from contracts, which are used when the principal purpose is procurement (i.e., acquisition of goods or services). Contracts entail specific deliverables and have detailed terms and conditions.

The subcontractor is an independent entity responsible for the completion of work described in the subcontract. It is the responsibility of the lead Principal Investigator to determine when it is appropriate to subcontract a portion of the work on a sponsored project. The investigator is responsible for coordinating timing, payment, deliverables, and other performance requirements

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with the subcontractor to ensure compliance with the terms and conditions of the sponsor under the prime award.

ORS coordinates subcontract agreements on the Chicago campus; OSPRA is responsible for processing subcontracts on the Urbana campus. Additionally, ORS and OSPRA are responsible for subcontract agreements received by the university from other entities.

The ORS staff who are responsible for contract negotiation are also responsible for processing subcontracts. There are 11 FTE that process subcontracts at UIC: eight Contract Negotiators and three contract support staff. ORS staff process approximately 800 to 900 subcontracts each year.

UIC Office of Research Services (ORS)
Similarly, the OSPRA Negotiation team is responsible for processing subcontracts. There are 11 FTE who process subcontracts at UIUC: two Assistant Directors, two Senior Award Negotiators, and seven Award Negotiators.

The volume of subcontracts at UIUC has increased significantly over recent years. In FY2013, OSPRA processed 833 subawards, compared to 492 in FY2005. To compensate, OSPRA is returning to a model where staff are cross-trained on all types of agreements rather than specializing in certain agreement types. With high staff turnover, challenges arise when staff members are only trained in a limited area.
ORS and OSPRA staff work closely with GCO throughout the subcontract process. GCO staff spend a significant amount of time analyzing and administrating incoming subawards and outgoing subcontracts. GCO has one FTE dedicated to post-award risk analysis and monitoring. The university has approximately 600 active subawards.

**Staff Roles and Responsibilities**
ORS and OSPRA staff work with the investigator and/or unit to process subcontracts. To initiate the subcontract process, the unit business contact must first assemble the subawardee’s Statement of Work (SOW), detailed budget, budget justification, investigator information, and organizational contact information. ORS and OSPRA employees are responsible for confirming that the subawardee’s proposed statement of work reflects the performance of a portion of the research rather than a routine service or procurement of goods. The OBFS Purchasing Division handles transactions for the procurement of goods and services. Staff members also review the terms of the prime award and the corresponding proposal to confirm that there is sufficient funding and that the period of performance is available for issuing the subcontract agreement.

**Process Overview**

*Subcontract Sponsor Terms Review:* After the prime award is successfully executed, the award information is reviewed by ORS/OSPRA staff to determine if the university has sponsor approval to initiate a subcontract. If it is determined that sponsor approval is required, the unit is responsible for working with the investigator to prepare the request. ORS and OSPRA staff will coordinate with GCO to review and forward the request to the sponsor.

*Subcontract Negotiation and Risk Assessment:* Subcontract negotiation and risk assessment begin after the subrecipient qualifications have been confirmed. Negotiation with the subrecipient is usually the limiting factor to the timely execution of a standard subcontract. ORS uses a standard agreement for non-federal subcontracts. OSPRA uses several template agreements for subrecipient activity. There is a nationally recognized FDP template, for those federal awards issued under the standard Research Terms and Conditions, and there are two other templates that were created internally—one for the pass-through of federal dollars and the other for private or state monies.

GCO uses metrics such as award size and complexity, location, and cost-sharing requirements to conduct an in-depth risk assessment for each subcontract. The results of the assessment are not currently shared with other units, but it would be helpful for ORS/OSPRA staff to have access to this information.

*Federal Demonstration Partnership:* The University of Illinois is a member of the Federal Demonstration Partnership (FDP). Therefore, certain research awards from major federal agencies (e.g., Department of Energy, NIH, NSF) are subject to the FDP General Terms and Conditions and FDP Agency Specific Requirements. FDP subcontracts do not require negotiation and are processed quickly. Greater use of master agreements can help to streamline the subcontract process and improve turnaround time.

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25 The Federal Demonstration Partnership is a cooperative initiative among 10 federal agencies and 119 institutional recipients of federal funds. Additional information is available at [http://sites.nationalacademies.org/PGA/fdp/index.htm](http://sites.nationalacademies.org/PGA/fdp/index.htm).
ORS/OSPRA should execute master agreements with subcontractors when possible and should work with campus leadership to eliminate the dual review of contracts and budgets by separate staff members.

PHS Conflict of Interest Compliance Pre-requisite: If the prime award represents PHS funding, the subrecipient must confirm that his/her institution has a policy compliant with the current PHS regulations related to conflict of interest. If the subrecipient’s institution does not have a PHS-compliant policy, the subrecipient investigators will be subject to the University of Illinois Policy on Conflicts of Commitment and Interest, and required to provide disclosure forms and certifications to ORS/OSPRA. Subcontract negotiation continues while PHS compliance is confirmed. However, funds are not released to the subrecipient until these requirements are met.

Subcontract Approvals and Signatures: Signatory requirements are the same for all incoming awards. The authorized representatives of the university and the subrecipient approve the subcontract agreement. Only the university comptroller is authorized to accept/execute agreements on behalf of the university. Additional levels of approval may also be required for the subcontract agreement, including:

- Investigator (either via email, signature on subcontract agreement, or signature on the appropriate campus forms)
- Department Head and/or Dean
- Legal Counsel for subcontracts involving terms and conditions not previously approved
- OVCR for agreements when conflict of interest concerns are identified

UIUC GCO staff members do not sign off on subcontracts. GCO confirms that funding and time are still available on the award for the subcontract. This confirmation is done through an email from OSPRA staff to the GCO staff administering the award.

When both parties have signed the subcontract agreement, it is considered fully executed and legally binding. At UIUC, OSPRA signs on behalf of the Board and obtains an authorizing signature from the subrecipient. Once the fully executed agreement is processed by OSPRA, it is forwarded to GCO. At UIC, GCO signs on behalf of the Board. An electronic copy of the agreement is sent to the investigator and the unit’s business contact.

Subcontract Regulation and Compliance: When the university receives federal funding for a project, either directly or indirectly as pass-through funds, there are specific compliance requirements. The Office of Management and Budget (OMB), which is responsible for oversight of federal agency performance, publishes regulations governing the management of federally sponsored projects. OMB Circular A-110 requires both a pre-award (subpart B.13, B.14) and post-award assessment (subpart C) and necessitates post-approval monitoring. As a result,


contracts are reviewed by ORS, OSPRA, and GCO staff. ORS and OSPRA negotiate, while GCO reviews for payment, billing, budget, etc.

ORS and OSPRA should consider assigning all components of a subcontract to one negotiator who performs the review of contract aspects, including budget, in addition to conducting the negotiation with the sponsor or subrecipient. This will ensure clarity and increase efficiency.

The investigator, the departmental administrator, and GCO are responsible for monitoring subrecipients throughout the life of the award. If the subrecipient is not performing satisfactorily, or if issues of compliance with the terms and conditions of the award arise, GCO will work with the unit and investigator to devise a strategy to correct the problem, including possibly withholding payments to a subrecipient. If there are concerns about either the performance of or the amount of funds requested by the subrecipient, they should be shared as quickly as possible with GCO, so that the issue can be resolved. GCO also reviews those subcontracts considered to be moderate to high risk on an annual basis in an effort to discover issues before they cause a problem (e.g., conflict of interest issues or fraudulent expenses).

Collaboration Management: Rather than issuing multiple awards to support collaborations, federal sponsors have increasingly moved to issuing more single prime awards, which forces the university to administer multiple subcontracts to support collaboration. As a result, subrecipient monitoring has grown exponentially. Adequate research administrative support infrastructure is critical to ensure compliance with subrecipient monitoring requirements. OSPRA has shared with ORS the policies and tools utilized on the Urbana campus for subrecipient monitoring. Additionally, GCO has advised on the staffing levels and requirements for monitoring.

Campus and University Administration should continue to focus on enhancing subrecipient monitoring to address faculty perceptions of insufficient quality of support.

Auditing: Federal sponsors have the right to the timely and unrestricted access of any documents or other materials related to an award. GCO receives multiple program-specific audit requests each week. Pressure to justify grant expenditures has increased over the past 5 years, especially for subrecipient activities. As a result, there is increased pressure on the university to regularly examine expenditures for fraud, waste, or abuse. As of this report writing, there are approximately 20 open audits, which include 14 audits of federal or private sponsored programs and 6 subrecipient engagements.

The annual audit of federal expenditures, conducted in accordance with OMB Circular A-13328, is coordinated through GCO, which serves as the official liaison between the auditors and any university unit. GCO staff also work with the Federal Audit Resolution Working Group to address the findings resulting from a federal audit. Additionally, GCO coordinates the responses and materials for the Legislative Audit Commission Hearing for the campuses. It is imperative

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that units participate in addressing audit recommendations, as they can impact the university’s ability to obtain future state and federal funding. Resolution activities include providing documentation, process information, and educational information related to systems and procedures.

The OMB circulars also require that the university review audit reports of subrecipient institutions to determine if any of the audit findings directly impact the university’s subcontracts. The benefit is that GCO sees trends/issues at other institutions and is aware of what to address on the university’s campuses, but the time spent reviewing these materials detracts from daily operational tasks.

**Faculty Feedback**

Faculty members spend a significant amount of their time on administrative tasks. GCO expects faculty members to review and approve all subrecipient invoices. While it was noted that this does not always happen (e.g. faculty in the Department of Animal Sciences do not review invoices), faculty have suggested that a more efficient billing process is needed. GCO is responsible for preparing and submitting the financial reports for sponsored projects, so it is critical that they have access to all of the documentation that the sponsor requires. Invoices are often late or inaccurate. In addition, when an invoice is rejected, there appears to be a lack of follow-up from GCO staff concerning the reason for rejection.

GCO should develop processes and systems to facilitate departmental verification of invoices sent to subrecipients and reports submitted to the sponsor.

The subcontract process is often challenging; it can take up to 6 months before a subcontract is finalized. Contract negotiators do not consistently update faculty on the status of negotiations, and the turnaround time for outgoing subcontracts is not ideal. Common causes of delay include discrepancies in the terms and conditions of the agreement, staff delays, and delays on the part of the subrecipient. These delays negatively impact the investigators’ ability to conduct research.

Additional campus-level support is needed to continue subcontract administration after the subcontract is approved. Greater coordination at the time of award receipt will also prevent delays associated with initiating subcontracts.

**Staff Feedback**

There are numerous issues with the ease and accuracy of accessing data from the various university systems. ORS and OSPRA staff members do not have access to Banner, which maintains the university’s financial data. Providing staff with Banner access and the appropriate training will improve the way they execute key processes. Alternatively, clarifying that GCO is responsible for providing the necessary financial information would shift subcontract responsibility from pre- to post-award.

University leadership should determine who is ultimately responsible for the review and approval of subcontracts. Consolidating all aspects of the subcontract process under one
unit would improve service by providing faculty and departmental business staff with one contact point with whom they interact.

The primary challenge faced by ORS and OSPRA staff when a subcontract is initiated is incomplete information. The subcontract process would be more efficient if there was greater coordination of materials and if information captured at the award stage was easily accessible.

Establishing a more formal triage process that allows ORS and OSPRA staff to quickly escalate open issues would improve subcontract response times.

Challenges: Communications
ORS/OSPRA and GCO should work together to determine the best method for communicating subrecipient information to ensure that risk is accurately assessed. To facilitate the contracting process, contracts are categorized as either low-, medium-, or high-risk based on conditions specified by University Risk Management. While most subrecipients are low-risk, there are mechanisms for managing work with a high-risk subrecipient. For example, the agreement terms can be amended so that funds are transferred to the subrecipient based on specified milestones.

ORS/OSPRA and GCO should jointly develop and document a communications strategy for sharing information with researchers and departmental business staff.

Challenges: Training
Providing proper training to departmental staff involved in research administration is a significant challenge. There is a clear need to educate staff on the appropriate policies and procedures for contracting with external individuals and organizations. Staff need to understand the role of a subcontractor versus a consultant, how to set up subcontract agreements, and the unit’s responsibility in monitoring subrecipients.

Campus leadership should consider implementing formal training and certification programs for departmental business staff.

Challenges: Information Technology
Similar to other aspects of research administration, the subcontract process would benefit from the implementation of an electronic system.

An integrated electronic system should facilitate the routing of subcontracts for review and approval and streamline communications between ORS/OSPRA staff, GCO staff, and investigators.
Ideally, a future contracting system would have the following functionalities:

- **Electronic Routing and Approval**
- **Subrecipient Repository**: Access to previously captured data would prevent staff from having to request information from an external entity multiple times each time a subcontract is awarded. The ability to search for subcontracts by institution and to capture the subrecipient’s organizational profile in a central location would streamline subcontract initiation.
- **Notifications**: The ability to notify the investigator and/or unit administrator of the need to initiate a subcontract would prevent delays. Additionally, a mechanism to communicate audit needs would facilitate information gathering to fulfill data requests from sponsors.
B. Post-Award

Post-award activities are those processes that take place after the grant, contract, or cooperative agreement has been awarded to the university. Once a grant or contract award is made, its success is contingent not only on the ability of the investigator to complete the research, but also on the ability of the university to provide proper stewardship of the funds awarded. The Offices of Grants and Contracts (GCO) on each campus support the post-administration of grants and sponsored projects. Each GCO reports to an Assistant Vice President within OBFS.
GCO staff support faculty and their departments in the administration and expenditure of sponsored project awards by developing and disseminating policies and procedures, managing financial interactions with sponsors, and assuring compliance with university and sponsor policies. GCO does not serve a control function, but rather provides support for each campus’s research efforts.

Post-award activities evaluated for Task Force purposes include:

- Award Administration
- Billing and Financial Reporting
- Data and Enterprise Systems
- Effort Reporting
- Award Closeout
- Compliance

The GCO office on the Chicago campus was restructured a few years ago as a result of recommendations made by the Huron Consulting Group. University leadership engaged Huron to assess post-award grants management and identify areas in need of additional resources or process redesign. As a result of the assessment, a strategic plan was developed that emphasized enhancing the customer service focus of GCO. The unit was restructured and additional staff were hired to support post-award administration. Huron identified the need to clarify roles and responsibilities in order to avoid duplicating efforts and streamline processes. To better serve the research community, GCO staff who were in “specialist” roles broadened their responsibilities and became “generalists” who provided oversight of a grant in all aspects of the post-award process. The restructuring provided faculty and departmental business staff with a single point of contact to help guide them through various aspects of the post-award grants management and compliance processes. Additionally, Huron benchmarked staffing levels against 21 other institutions, including the Urbana campus, and reported that GCO was significantly understaffed. GCO continues to evaluate and improve policies and procedures for effective post-award administration. Staffing levels are now aligned with the volume of grants administered.

The GCO office on the Urbana campus continues to evaluate staffing and procedures for effective award administration and will restructure as needed. After a period of significant turnover, the office is now fully staffed in the award administration sections. GCO strives to be fully staffed to maintain a high level of customer service to campus units and research sponsoring agencies. The office has increased efforts in staff recruitment, retention and professional development. This year GCO recruited and hired an Assistant Director of Awards Administration Training to oversee internal training and develop GCO training opportunities for campus units. GCO is involved in a joint effort with OSPRA and Government Costing to develop a training certification program. GCO also continues to develop partnerships with campus units for effective award administration. The Compliance Section has been expanded and additional staff have been added to coordinate the increasing demands of compliance and internal and external audit activity.
1. Award Administration

Sponsored project funds awarded to and administered by the university must conform to sponsor guidelines as well as university policy. After an award is received, GCO disburses Banner-fund CFOP information. The management of sponsored project accounts involves a variety of administrative aspects, including:

- Banner Lookup Forms and Queries
- Sponsor Regulations
- Billings
- Payments
- Accounts Receivable
- Financial Reporting
- No-Cost Extensions
- Budget Revisions
- Cost Transfer Approvals
- F&A Assessments
- Tuition Remission Assessments
- Fringe Benefit Assessments
- Cost Sharing
- Subcontractor Risk Assessment
- Subrecipient/Consultant Encumbrances and Payments
- Resolution of Delinquent Accounts Receivable
- Project Closeout

Staff Roles and Responsibilities

GCO on the Chicago campus is composed of units with distinct functions, including Cash and Receivables Management, Information Systems, Compliance, and Costing. There are 31.5 FTE. The award portfolios of the Award Coordinators and Specialists are college-based.

The units within the GCO on the Urbana campus differ from those on the Chicago campus. GCO units in Urbana include Data and Enterprise Systems, Compliance, Personnel and Operations, and Policy and Data Management, all of which also provide services to the Chicago and Springfield campuses. There are 39 FTE in total. Award Coordinator portfolios are agency-based, with each coordinator(s) responsible for a sponsor type (i.e., federal: NIH, NSF; state; or private).
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Process Overview
Although there are differences in the award administration processes on each campus, GCO is ultimately responsible for the financial oversight of sponsored projects post-award administration.

UIC Award Administration: Once the award document is approved and accepted, ORS sends a congratulatory email to the investigator and other key research personnel, and to GCO, via gcosetup@uillinois.edu. GCO then sets up the award account in Banner within 10 business days and facilitates the post-award administration.

UIUC Award Administration: Once the award document is approved and accepted, OSPRA sends an email to the PI and departmental contact person noting its finalization and providing a copy of the award document. After all award documents have been fully executed, OSPRA forwards the award document packet to GCO, which initiates the transition from pre-award to post-award. GCO then sets up the award account in Banner and facilitates the post-award administration.

The notification sent to investigators specifies the following:

- Institution Number
- Type of Action: New, Continuation, Renewal
- Short Title
- Project Title
- Project Begin/End Date
- Budget Begin/End Date
- Principal Investigator
- Department Name
- Banner Grant Code (see below)
- Fund Code
- Organization Code
- Program Code
- Index Code
- Direct Cost
- Indirect (F&A) Cost
- Tuition Remission
- Assigned GCO Specialist
- GCO Setup Date

Award Tracking and Codes: The Banner sponsored project grant code and associated fund codes are unique codes assigned by GCO to each sponsored project. These are the primary means of tracking individual projects. Sponsored project awards often perform over several years, and all associated activities must be tracked for the lifetime of the award. The grant code and associated
fund codes are the mechanisms that allow sponsored project expenditures to be tracked across fiscal years.

The Banner sponsored project grant code and associated fund codes created for each sponsored project contains the budget approved by the sponsor. This budget may differ from the budget included in the original grant proposal for several reasons, including:

- The sponsor revised the proposed budget that was originally submitted with the proposal. In this case, the unit is asked to submit a revised budget to ORS/OSPRA.
- Rates (F&A, fringe benefits, etc.) may have changed since proposal submission.
- Accounting categories in Banner may be different from categories used by the sponsor, resulting in differences in the budget.

**Allocation Management:** Next, GCO staff set up billing and reporting events per the terms and conditions of the award. GCO is responsible for submitting financial status reports (i.e., grant expenditure reports or grant budget reports) to the sponsor.

The investigator is responsible for the day-to-day management of the project’s activities, including budget allocation decisions and expenditures charged to the sponsored award. GCO encourages investigators to regularly monitor sponsored projects and reconcile accounts on a monthly basis. Salaries, travel, equipment, supplies, services, and other direct costs are reported on the Banner monthly accounting statements (i.e., Detail/Summary Operating Ledger Statements and Operating Ledger Transaction Statements). Statements are usually available on the second week of the month. Investigators and/or departmental business staff should review the statements to verify that the charges are allowable and proper and initiate corrections as needed. The monthly reconciliation of sponsored project accounts ensures that errors are identified and resolved quickly.

Corrections to expenditures on sponsored awards should be made promptly: by no later than 90 days after the initial posting. Corrections after this period are considered non-current and require additional justification, explaining why the transfers were not made in a timely manner.

Only expenditures that directly benefit a sponsored project, which are called allowable expenditures, can be charged to the sponsored project fund. The mechanism for confirming that only allowable expenses were charged to a sponsored project fund is the semi-annual Sponsored Project Expenditure Confirmation. For the six-month periods ending in December and June of each year, each investigator certifies an after-the-fact confirmation that includes all direct charges and cost sharing effort for each sponsored project. GCO provides units with a list of projects, with associated expenditures and contributed effort commitments for each investigator. The investigator verifies the expenditures, coordinates with business staff to initiate any necessary corrections, then signs the confirmation and returns it to the unit business administrator, who returns it to GCO.

**Electronic Systems Support and Reporting:** GCO has developed a number of automated processes to assist investigators and unit business managers with the administrative responsibilities related to sponsored awards. A notable example is the automated semi-annual confirmation system used on the Urbana and Springfield campuses. This was previously handled
as a paper confirmation, which did not enable those reviewing the expenditures to drill down for additional information. On the Urbana and Springfield campuses, the semi-annual confirmation is completed via an online application. After the final month in the reporting period has closed, expenditure data are verified and reports are created and delivered to departments. Notification emails are sent to departments and investigators when the reports are available for review; these provide a link to the online application. Departmental business staff review account transactions, salaries and wages, and cost transfer status. Any cost-sharing information must also be reviewed and agreed to before the report is sent to the investigator for review and confirmation. Grant reports that are confirmed and have the final departmental review completed are submitted to GCO. Automated reporting has assisted in assuredly completing these important certifications.

These confirmations provide the basis for university reports to the federal government about the allowability, allocability, and reasonableness of charges placed against federal funds. The external auditors who are performing the A-133 federal compliance audit review the expenditure confirmations for federally sponsored projects to determine if the university’s internal controls are in compliance with federal regulations. Failure to have these confirmations on file at GCO for review and observation during the A-133 audit can result in all of the grant’s expenditures for the reporting period being disallowed.

In addition to managing semi-annual expenditure confirmations, GCO provides monthly electronic reports to assist investigators in grant administration and help assure that all of the university’s obligations for the project have been met. GCO staff members coordinate with the units and investigators to provide the necessary reports and documentation to the sponsor. The Urbana campus GCO is currently developing a PI portal in partnership with OSPRA as well as UI Reports, an OBFS ITPC project initiative.

GCO staff on the Chicago campus provide investigators with a Report of Expenditures (ROE), which is a reflection of the grant activity posted to Banner. The ROEs are prepared annually for projects requiring an annual financial status report. If a project does not require an annual financial status report, the ROE is prepared at the end of the project. An ROE enables investigators to review and approve grant expenditures prior to filing a financial report, issuing a final bill, or closing out a grant. GCO expects investigators to review the ROE against their financial records for the grant to ensure that reported activity is accurate and complete. The ROE should be returned to the GCO grant specialist who sent it within 10 days of receipt; it should include changes or approval. The “Memo” and “Summary” sections contain specific actions that the investigator must take. The investigator’s approval of the ROE signifies adherence to those expectations.

**Faculty Feedback**

The university maintains a variety of resources that provide sponsored project-related reports (e.g., Banner, View Direct, EDDIE, Business Objects). Faculty members find it difficult to locate information in Banner. Some Banner forms can be used to run queries that reflect all transactions processed to date, but it is difficult for faculty to comprehend the data from Banner and translate it into usable information such as expenditures incurred-to-date, encumbrances, and available funds remaining.
While OBFS offers training in how to use Banner, it is not an efficient use of faculty time and distracts from their research efforts. Faculty noted that a monthly email notification on the status of their grant accounts would be helpful.

Many faculty members have the perception that the data available in Banner is outdated, especially data related to encumbrances on accounts. GCO staff confirmed that the data is accurate and up-to-date. This misperception reinforces the need to strengthen communication efforts.

Faculty members need simple, clear guidance on how to access financial information for their grant accounts.

Current training materials are often buried on the OBFS website, and faculty do not have the time to search for this information. Resources should be easy to find and targeted towards individuals with limited knowledge of Banner and other university systems.

It would be helpful if administrative staff, either from within a faculty member’s unit or from GCO, met with faculty regularly to provide advice and clarify grant administrative policies and procedures. A grant administrator or financial manger serving in this role could review payroll distribution with the investigator to ensure that the salary charged to the grant matched the effort committed and confirm that all project personnel are paid from the correct funding source. Additionally, this individual could review grant terms and conditions, deliverables, and the financial status of the award, and prepare required budget revision requests.

Administrative tasks are burdensome to faculty. Regular meetings with a trained individual who provides one-on-one support could help alleviate this burden and allow more time to be spent on research. It would also help to ensure compliance with grant expenditure requirements and reporting deadlines.

The cost principles set by the federal government are applied to virtually all unit expenditures, and not just to federal funds, regardless of whether or not a unit has sponsored projects, since a portion of their expenditures are used to develop the indirect cost rate. Policies for the treatment of costs can vary by category of funding sources. Many costs are allowable under university policy, but must be accounted for in a way that allows them to be identified and excluded from indirect cost rate calculations. These restrictions create numerous challenges for faculty trying to charge expenditures to grant accounts. The rules are extremely rigid, and it is difficult to rebudget funds.

Sponsors can allow budget transfers among direct cost categories, the rebudgeting of direct costs to F&A costs and vice versa, and the transfer of funds allotted for training allowances to other categories. Budget revision, however, is a very manual process that is managed by multiple approaches across units. Rebudgeting is a primary cause of delay in the account setup process.
**Staff Feedback**

In accordance with federal cost principles, the university is required to confirm the effort (direct and cost shared) put forth on each sponsored project. As a result of past university audits, other direct charges are also confirmed on the Urbana and Springfield campuses. The review of expenditures is the aspect of award administration on which GCO staff spend considerable effort.

GCO staff pre-audit expenditures that represent a high risk for audit disallowances, which typically include the following transactions:

- Consultant and honorarium payments
- Non-employee travel expenses
- Subaward payments
- Cost transfers
- Cash deposits (refunds or reimbursements)
- Leases (equipment, space)
- Equipment requisitions

GCO periodically post-audits certain categories of expenditures on federal projects to confirm allowability under federal costing principles. On a quarterly basis, GCO reviews charges to federal projects that have been designated as potentially unallowable or restricted under OMB Circular A-21 cost principles, including projects funded with federal pass-through funds. Over 40 pages of the circular are dedicated to unallowable expenditures. Examples include meals, parking, and clerical expenses, all of which typically require specific approval from the sponsor. If these expenses are not approved in the budget justification, GCO works with departments and units to determine their allowability and remove charges as necessary.

GCO staff review 100 percent of transactions that are charged to a federal project for certain cost categories designated as unallowable or restricted. This typically requires the review of over 2,500 transactions. Unjustifiable transactions are transferred to appropriate departmental funds. If subsequently justified as allowable, they may be transferred back to the sponsored project fund. Staff spend a significant amount of time gathering documentation and reviewing expenditure justifications to ensure that costs are reasonable, allocable, allowable, and treated consistently. According to GCO staff, this review process is made more difficult when investigators do not include cost information in the budget justification of the grant proposal or the scope and needs of the sponsored project change. GCO staff attempt to pull as much of the cost information from Banner or the proposal materials as possible before requesting assistance from departmental business staff or the investigator.

Investigators should prepare a detailed budget narrative that explains how budgeted costs relate to the work proposed. Special requirements should be clarified and the investigator should thoroughly describe the basis of estimates or rates, specify equipment to be purchased, and justify restricted costs. This information will assist GCO in reviewing expenditures for approval and help prevent audit issues in the future.
A cost transfer is a reallocation or redistribution of a previously charged expenditure. Cost transfers may be made if the charges meet all of the following conditions:

- Allowed in accordance with the terms and conditions of the award document
- In compliance with University policies
- Supported by documentation justifying the transfer
- Certified as to the correctness of the charge

A Journal Voucher (JV) is used to transfer non-salary items. A GC81 Cost Transfer Justification Form signed by the investigator, copies of original documents, and a detailed justification for the cost transfer must accompany each non-current JV. All JVs enter an approval queue in Banner and must be approved by GCO. Review of the JV queue is the most challenging area of post-award administration for GCO staff and requires a significant amount of time. Thousands of JVs are processed by GCO through the year and the volume increases significantly at year-end.

**Challenges: Communication**

GCO strives to operate with consistency across all sponsored project awards, but does not have the staff to review all charges on each and every award. Investigators and grant administrators in units must partner to help ensure compliance. It is critically important that policies governing the allowability of expenditures are understood, not just by the grants administrative staff, but also by the investigators. For their own protection, investigators need to better understand the administrative concepts and requirements related to the awards they accept.

**GCO should develop and document a communication strategy for sharing information with researchers and departmental business staff.**

Although there has been some work done by the campus GCOs to develop and formalize internal and external communications plans, there has been little effort to evaluate opportunities across the campuses to define standard operating procedures or share best practices. Inconsistency is inefficient and often creates unnecessary complexity.

**UIC and UIUC GCO units should communicate regularly and work together to identify opportunities for the improved alignment of processes across campuses and ensure consistent research support. University leadership must hold units accountable for process efficiency.**

It is recommended that business processes follow a “TurboTax” model that has been designed to guide customers through step-by-step processes. For example, all campuses could use a similar process for confirming grant expenditures, where units and investigators are provided with transactional information to review and approve via a web-based system.

**Challenges: Training**

It appears that the quality of customer service provided by GCO staff is an issue when staff lack necessary knowledge or expertise. Campus faculty and staff are often frustrated when they
receive inconsistent answers and when GCO staff is unable to adequately explain policies or procedures. Although professional development and training opportunities exist, the investments made by GCO in its staff do not always produce an adequate return due to a high turnover rate. Furthermore, a lack of proficiency of individuals within GCO results in departmental administrators or business managers seeking contact with specific individuals rather than working within the functional structure of the office.

The GCO directors recognize that staff training and professional development are critically important. The Urbana campus GCO has hired an Assistant Director of Awards Administration Training and developed a comprehensive training program for new employees. The GCO on the Chicago campus has developed various training tools to promote a customer service orientation among staff. However, there have not been significant enterprise-wide training efforts due to a lack of resources. A significant amount of time is required to properly train staff. For example, managers felt it took a minimum of three years to train staff to be proficient in grants and contracts. Staff members are highly valued after they have completed training and often find opportunities in campus units that perceive as more appealing due to higher salaries and a work environment that is less stressful. Departing staff members create vacant positions that are difficult to fill, and once a position is filled, it takes years to get the new hire up to speed on policies and procedures. As such, there is rarely enough staff in a unit at any point in time with the necessary skills and expertise.

University leadership should provide additional resources for the development of an enterprise-wide sponsored projects training program, as well as support the creation of dedicated positions responsible for the oversight of training efforts.

GCO staff indicated that campus departmental and unit staff members responsible for grant administration do not always fully comprehend university policy or state and federal regulations, and often do not follow established procedures. This disconnect presents an opportunity for cross training and knowledge sharing that would enhance operations for all units.

GCO should consider implementing a staff “intern” program, a formal exchange between GCO and campus units as appropriate. This program would serve as a way to encourage high-level grants knowledge and skill development throughout the university system.

Challenges: Information Technology

The implementation of an electronic research administration system would help to integrate pre- and post-award functions and facilitate efficient award administration. An integrated system would increase the consistency of sponsored project budget data and reduce duplicative and manual data entry for both ORS/OSPRA and GCO staff. Currently, award information entered by ORS/OSPRA staff in ULeRA must be re-entered in Banner by GCO staff. An application was developed to automate this process, but it has such limited functionality that GCO staff members find it more efficient to enter the data manually.
An integrated electronic system that connects pre- and post-award functions would reduce duplicate data entry. The system should automatically exchange account data with Banner.

Additionally, the process to create sponsored project grant codes and associated fund codes is laborious and requires a significant amount of manual data entry. New grant and fund codes include the project budget and incorporate numerous account attributes to facilitate post-award administration. GCO staff spends a large amount of time collecting information before it is entered in Banner and grant and fund codes are established. An electronic system would enhance process efficiency.

Reporting data is difficult to extract. Faculty and departmental business staff would like to run web-based customized reports efficiently and quickly. At a minimum, faculty would like to be able to easily assess timely and accurate amounts of unobligated grant funds.

An integrated electronic reporting system should provide faculty and staff easy access to grant information.

2. Billing and Financial Reporting

The university requests that sponsors provide advance funding when possible, so that the university is not using its funds for sponsored projects. When sponsors provide funding on a cost reimbursement basis, the university obtains reimbursement soon after expenditures have been made.

Billing for sponsored projects requires an invoicing process that is significantly different from invoicing for goods and services. GCO is responsible for preparing and submitting the billing and financial reports for sponsored projects. Departmental assistance may be required in cases where the sponsor requires documentation that is extensive or unavailable to the GCO.

Staff Roles and Responsibilities

GCO staff is responsible for ensuring that funds are received from federal and private agencies sponsoring research at the university. On the Chicago campus, the award administration function in GCO is responsible for billing and financial reporting. This function is broken down by campus colleges and units, with each area having various combinations of sponsored award coordinators/specialists, grants and contracts coordinators/specialists, or a business administrative associate. For example, one Senior Assistant Director on staff oversees six FTE: two Sponsored Award Coordinators, two Sponsored Award Specialists, one Grants and Contracts Specialist, and one Business Administrative Associate. These individuals are responsible for the administration of sponsored projects for the College of Medicine. A second Assistant Director leads a team of four FTE and oversees award administration for the Schools of Public Health and Art and Design; the Division of Specialized Care for Children; the OVCR, the library; and various colleges, including Business Administration, Pharmacy, Urban Planning and Public Affairs, and DSCC. Finally, there is an Assistant Director who oversees four FTE who
are responsible for the Applied Health Sciences, Liberal Arts and Sciences, Engineering, Dentistry, Nursing, and Education colleges.

An additional two FTE are responsible for cash and accounts receivable management, including one Assistant Director and one Cash Management Specialist. These individuals apply sponsored payments to the appropriate accounts, resolve delinquent accounts receivable, and analyze the aging of receivables. The GCO grant specialists and grant coordinators (14 FTE) who are responsible for the oversight of projects are also responsible for their billing.

On the Urbana campus, 19 FTE for award administration in GCO are involved in billing and financial reporting. The staff member assigned to the award is responsible for overseeing the payment terms of the award, ensuring that the sponsor is billed accordingly and that the funds are received. The staff member is also responsible for preparing financial reports in accordance with the terms of the awards. There are an additional four FTE in the Data and Enterprise System section that handle system processes for invoicing all three campuses as part of their responsibilities. There are also four FTE who handle the cash receivables management and closeout of awards.
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UIUC Grants & Contracts Office (GCO)
Process Overview
Funds are obtained from sponsors by various means. Some awards from federal agencies operate under letter of credit (LOC) procedures. Others use advances as agreed upon in the awards, and cost reimbursement contracts are billed based on project expenditures. GCO is responsible for obtaining and processing payments from all sponsors, and for following up on delinquent payments.

Billing Processing: Expenditures are posted to Banner funds throughout the month. Billing statements are automatically generated by Banner, but are often supplemented by spreadsheets created by GCO staff. Approximately 75 percent of billings are processed through Banner, and 25 percent are processed manually. Automatic billing is not an option because all invoices must be certified before they are paid.

Pooled-Payment and Letters of Credit Billing: The university submits a pooled payment request or LOC for an identified group of federal awards when funds are needed to meet current expenses. Cash withdrawals are timed as closely as is feasible to actual cash disbursements. Payments received under this method are deposited directly to the applicable sponsored project revenue account.

LOC draws are based on the amount of expenditures posted to the project up to the award amount. Each week, GCO staff calculate the drawdowns based on actual expenditures for each line of credit for all projects sponsored by a given agency. Payment requests to sponsors with letter of credit awards are typically processed monthly. Funds are then sent to the campus bank account via electronic funds transfer. Cash is posted to the applicable LOC pool fund in Banner and applied directly to a specific grant’s billing by GCO staff. Quarterly, or at other agency-required intervals, GCO staff generate a report of allowable expenditures for all projects under each agency’s respective LOC and prepare a cash position report or Federal Cash Transaction Report to account for how the funds were utilized for the sponsored projects covered by each pooled LOC payment.

Cost-Reimbursement Billing: For cost-reimbursement projects, the university can bill the sponsor for actual costs incurred up to the amount of the award. An accounts receivable account is established for each project. Payments are deposited directly to the revenue account and credited against the receivable. Payments are made by the following mechanisms:

- Periodic billings are submitted to the sponsors for costs incurred, as soon after the costs are incurred as practical (usually monthly).
- A small amount is provided in advance to cover working capital needs, followed by periodic billings based on costs incurred. The advance is normally applied to the final billing.
- The entire amount is provided in advance and any unused funds are returned to the sponsor at the conclusion of the project.
- A fixed schedule of amounts to be paid on specific dates is established. The university is often obliged to initiate payments by submission of an invoice; in some instances, however, the sponsor automatically sends the payment.
• Amounts are paid upon the completion of established milestones, an option that requires investigators and departmental business staff to work with GCO to notify the sponsor of milestone accomplishments that trigger payments.

Billings are usually required on a monthly basis for cost reimbursement projects, unless the terms of the award provide otherwise. Estimated revenues post automatically based on expenditure activity. A billing event creates an actual sales invoice, which is sent to the sponsors. In some cases, bills are manually generated by staff to meet unique terms or because of overdrafts. Staff use Evisions, Banner’s billing application, to create bills. Invoices must exist or be created against grant funds in order to apply payment to a project.

**Fixed-schedule and Technical-progress Billing:** Other projects may require billings based on a fixed schedule or technical progress. To avoid a lapse in funding, it is important that the units provide the GCO with the milestone or progress information necessary to trigger billing or financial reporting.

**Financial Reporting:** Throughout the award period, reporting is performed by campus units and by GCO specialists and coordinators. Sponsors have various reporting requirements for the nature, frequency, and content of reports. GCO has established procedures to monitor compliance with financial reporting requirements. The staff use Banner event dates or Outlook tasks to trigger project specific reporting, billing, and other event dates. Typically, financial reports are required annually and/or at project termination, but some sponsors request quarterly or semiannual reports. Upon event trigger, GCO staff facilitate financial reporting. The basic sources of information used to prepare these reports are official university accounting records and cost sharing commitments. GCO requests departmental verification of reports prior to submission to the sponsor.

**Staff Feedback**

GCO staff continually assess and re-engineer billing and reporting processes to improve performance. There are still numerous challenges associated with billing for sponsored projects, including:

• Expenses not posted to the project account in a timely manner
• Unclear billing terms (i.e., frequency, format)
• Amendments not received until months after the budget period has expired
• Missing unit confirmation of expenditures prior to final billing

Investigators and their departments are responsible for ensuring that all award funds are expended appropriately and prior to the end of the award budget period. Spending the awarded funds by the budget date can be a challenge for investigators due to delays in the purchasing process and procurement restrictions. Delays in employing new staff because of hiring policy and procedure issues further complicate the matter. As a result, it is difficult for GCO staff to review and post all expenditures to the appropriate accounts by the grant end date. Only charges that originate or are formally obligated before the end date can be charged to an account after a grant has expired. Charges that originate after the end date may only be processed if the
sponsored agreement provisions allow it, or if the account is being used in anticipation of additional funding from the sponsor.

**Challenges: Information Technology**

GCO staff relies on various tools and systems for billing and reporting, including Banner, UlleRA, and Desktop Intelligence reports. On the Chicago campus, DDARTA (Due Date, Awards and Reports Tracking Application) is the primary tool used by GCO staff for billing activities and financial reporting as well as for other award administration tasks. The lack of an integrated system that allows for electronic invoice submission hinders the billing process. Information included with grant payments is often incomplete, which can delay the identification and posting of payments to grant accounts. Data and Enterprise Systems staff members on the Urbana campus have developed system reports to facilitate financial reporting to sponsors that benefit all campuses. The lack of an enterprise-wide system, however, delays review of expenditures and cost transfer approval.

An integrated electronic system is needed to streamline the award billing process, simplify the review of expenditures, and facilitate financial reporting.

3. **Data and Enterprise Systems (UIUC)**

Data is a critical enabler of efficient processes; data accessibility is critical for grant reporting. In the current climate of increased compliance monitoring from both federal and state agencies, it is imperative to have technological resources that can respond rapidly to support changing compliance requirements as well as identify ways to minimize the administrative burden on research faculty and staff.

**Staff Roles and Responsibilities**

GCO Data and Enterprise Systems staff members on the Urbana campus provide support and oversight of the Banner grants module and grants-related systems and processes across all campuses. As part of their responsibilities, for all three campuses, the group processes billings and calculates letter of credit draws for all sponsored projects, updates and maintains Banner grant tables, and produces daily datasets of sponsored project data. Data is also provided to the OVCR and multiple units across the Urbana campus. Data and Enterprise Systems staff also provide testing input on system upgrades, enhancements, and patches. Staff members also provide assistance with interim billing events, reconciliation or other billing issues, and cash applications.
GCO Data and Enterprise Systems comprises four FTE: one Associate Director, one Assistant Director, and two Senior Coordinators. 60 to 70 percent of staff members’ responsibilities directly impact grants and contracts activities on the campuses. These staff members collaborate with AITS, OBFS Business Information Services (BIS), UIC and UIS Grant Offices, and other units to improve business processes and efficiencies for the campus research community.

For most federal agencies, payment for research performed at the university is done through a letter of credit (LOC). Cash is drawn down using various agency systems from the Federal Reserve for deposit into a university account. The amount drawn is based on actual expenditures of federal research awards. The Data and Enterprise Systems group generates all sponsored project billings and calculates cash draw amounts for over 40 letters of credit on a monthly basis, and an additional 4 institutional letters of credit on a weekly basis.

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<td><strong>$931M</strong></td>
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The Banner grants module is complex and heavily modified. As a result, GCO Data and Enterprise Systems staff members devote a significant amount of time providing input and testing. Banner upgrades are scheduled at least yearly and testing can span from three months for a routine upgrade to six months or greater for an upgrade involving substantial changes. Staff members collaborate with AITS and BIS to ensure that billing and printing processes, indirect cost and revenue assessments, and other grant functions are working correctly.

GCO Data and Enterprise Systems staff members develop and deliver Banner billing training to new staff, including communicating and demonstrating new functionality and system changes for system upgrades and enhancements.

**Process Overview**

GCO Data and Enterprise Systems staff members produce daily datasets of sponsored project data that are used by all of the campuses to meet daily operational needs. The data are used extensively by the grants offices for grant reporting, audit inquiries, campus requests for information, internal *ad-hoc* queries and analysis, and quarterly federal reporting. Staff continually validate and troubleshoot data download processes to improve efficiency.

Staff design and produce monthly datasets and reports for grants staff to assist in billing, closeout, and data validation. For example, GCO utilizes the Aged Accounts Receivable report for billing purposes.
Staff Feedback
GCO staff members recognize that the efforts of the Data and Enterprise Systems team impact all post-award administration activities. The Data and Enterprise Systems team embraces opportunities to represent the interests of GCO, because its staff have a desire to positively impact the financial administration of sponsored projects as well as GCO operations.

GCO works with the external audit firm assigned by the Office of the Auditor General of the State of Illinois to complete the federal compliance audit (or A-133 audit) for the university. The Senior Director of GCO is responsible for the coordination of the federal audit for all three campuses and for ensuring that the audit is completed by the March 31 deadline each year. Data and Enterprise Systems staff members provide on-going support for the audit in terms of data requests for billing/cash draw testing and procedural information. Audit-related requests continue throughout the year and are often laborious with quick turnaround times. Resources are routinely diverted from other priorities. For each federal finding, GCO creates a corrective action plan and works with the appropriate agency to achieve final resolution. Data and Enterprise Systems staff also support audit resolution activities.

Other ad hoc requests for data from campus units often become a priority for the Data and Enterprise Systems group without prior notice. Similar to the requests from the auditors, creating customized datasets to fulfill campus requests is labor intensive and often requires other tasks to be put on hold.

Enterprise-wide IT initiatives that have a grants and contracts component rely on AITS, BIS, and other OBFS units. They typically take many months or even years to complete due to competition from other projects for resources. Feedback from GCO staff, as well as staff from other units, indicates that they are frustrated with these lengthy project timelines. Data and Enterprise Systems staff members are often assigned to the project team to provide grants expertise. Additionally, the Associate Director of Policy and Data Management in GCO on the Urbana campus participates in these team-based IT initiatives. While these initiatives are important to the university as a whole, they often divert much-needed resources from GCO.

4. Effort Reporting
As a recipient of sponsored funds, the university must assure federal agencies and other sponsors that the effort committed on an award has actually been expended. Effort reporting is mandated by the federal government and assures sponsors that the assignment of time and associated salary and fringe benefit costs to sponsored projects is reasonable in relationship to the work performed. Inadequate effort reporting or failure to comply with federal regulations can lead to financial penalties, expenditure disallowances, loss of funding, and harm to the University’s reputation.

Federal regulations, including OMB Circular A-21 and HHS/PHS Grants Policy Directives, provide a basic regulatory framework for effort reporting. Campus policies build upon this

regulatory framework. However, details of the policies and the procedures for certifying effort vary by campus.

**Staff Roles and Responsibilities**

Effort reporting is part of GCO’s compliance duties. The Compliance team within each GCO is responsible for developing and disseminating policies, procedures, and practices that enable the campus research community to be compliant with federal regulations as well as sponsor guidelines and expectations. The team serves as the liaison between external auditors and campus units, and partners with units in addressing various compliance concerns via training, communication, and issue resolution.

In 2009, the UIC GCO adopted an effort reporting process with assistance from the Office of Institutional Research (OIR), which is the central administrative unit responsible for the collection, analysis, and dissemination of institutional data. OIR creates analyses that allow policies to be made and helps campus units and departments make sense of information. GCO has since developed an electronic system to support the effort reporting process.

The UIC GCO does not have a dedicated staff member responsible for the oversight of the effort reporting process. All members of the compliance team, which includes one Assistant Director, one Coordinator, and one Specialist, are responsible for effort reporting. This is just one aspect of these individuals’ responsibilities. GCO staff assist with the completion of effort reports, provide training as necessary, monitor completion of effort reports, and notify departments if there are questions or concerns regarding the effort reported.

GCO provides a variety of training resources on effort reporting, including in-person open labs that enable faculty to receive hands-on assistance to complete their effort certifications. Sessions are well received by faculty and staff. Online training, webinars, video clips, and other helpful resources are available on the OBFS website. GCO engages in training activities with units across campus and within OBFS on training activities, including ORS and unit business managers. The OBFS Training, Performance Development, Communications and Policy team helps to manage the development and delivery of training for campus units. The assistant directors in GCO on the Urbana campus conduct a majority of the training sessions as no staff members are dedicated to training activities.

Faculty and staff with questions or concerns about effort reporting may contact the Effort Reporting Help Desk. Four FTE are devoted to the Help Desk and are available Monday through Friday from 10:00 A.M. to 4:00 P.M. GCO has received positive feedback on the Help Desk and will continue to dedicate resources to it.

UIUC does not have an effort reporting process. Instead, the campus requires confirmation of expenditures twice per year. This is an online process. Two FTE within GCO coordinate the electronic confirmation process: one Senior Coordinator of Compliance and one Associate Director of Policy and Data Management. Staff members are responsible for semiannual expenditure confirmations and the review of cost sharing commitments, which are both part of

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the reporting process. The UIUC Division of Management Information (DMI) is responsible for collecting and verifying the effort spent on teaching, research, public service, and other activities by all academic and graduate assistant employees located in Urbana.

**Process Overview**

Effort refers to the time spent on all university activities (e.g., instruction, research, public service, administration, patient services, and other institutional activities). Individuals are expected to devote 100 percent of their workload to fulfilling their commitment to the university, and in general, UIC considers a full workload (or 100 percent effort) to be no less than 40 hours, but no more than 80 hours per week.

Effort reporting is the process of monitoring and validating 100 percent of an individual’s total professional effort. It includes the time spent working on sponsored projects in which salary is directly charged or cost-shared. To receive funding, UIC must maintain an accurate system for certifying effort. The system must specifically track the percentage of effort dedicated to sponsored projects. Effort reporting serves as a way to reconcile that salaries and wages that have been charged or cost shared to sponsored projects are consistent with the effort committed and contributed to sponsored programs.

**Effort Certification:** Any salaried employee who commits effort to a sponsored project must certify effort. Investigators must certify effort for themselves and for their direct report staff. While investigator certification is not explicitly required under OMB Circular A-21, other universities’ experience has shown that, in practice, investigators have the best knowledge of their own effort and the effort of the staff that report directly to them.

Some grants have multiple investigators managing one or more funds that have been set up under the parent grant. For example, multiple funds might be set up for Program Project grants or a separate fund might be set up for the internal allocation of funding to a co-investigator’s department. In these cases, the “fund” investigator will certify effort for him- or herself and for the staff paid from his or her fund(s). Co-investigators, individuals who report to more than one investigator, and individuals who are paid from both sponsored and non-sponsored funds are responsible for certifying their own effort.

**Salary Review and Labor-Distribution Reporting:** Salaries charged to sponsored projects or cost-shared must have after-the-fact confirmation that they were properly incurred. GCO encourages investigators and departmental business staff to review and reconcile budget statements regularly to determine required salary distribution changes, detect errors, and make payroll adjustments to reflect appropriate effort commitments. At the end of each month, payroll labor distribution reports are made available to the units. Units are to provide each investigator with a copy of their sponsored project payroll labor distribution report or a unit form containing the same information. The information on the payroll labor distribution report is used to determine that the salaries charged to each sponsored project are reasonable in relation to the work performed. In signing the semi-annual confirmation of expenditures, investigators confirm that they have reviewed monthly payroll labor distribution reports and initiated any necessary corrections or labor redistributions.
**Labor Redistributions:** Departments must submit labor redistributions within 90 days from the date when the original transaction was posted to Banner, consistent with the university’s cost transfer policy for all expenditure categories. Labor redistributions must be supported by documentation that describes how and why the transfer is appropriate. All redistributions for the current effort reporting year (August 16–August 15) must be completed by October 1st to facilitate accurate and complete effort reporting. As a result, there will be instances where departments do not have the full 90 days to complete their required labor redistributions. Retroactive salary adjustments are highly discouraged for periods in which effort has already been certified, and must be processed in accordance with the campus policy on exceptions.

**Effort-report Tracking:** Faculty and staff who commit effort to sponsored projects must certify their effort annually, a process which is completed in October. Effort reports are certified after the effort has been expended and show the actual effort spent on a project. At UIC, effort reports are tracked in the Effort Reporting System (ERS). ERS data are used to support federal compliance activities and are collected only for academic staff with effort, paid or unpaid, on sponsored projects. Business managers and other departmental support staff are expected to assist with and facilitate the process of effort certification. Business managers enter effort commitments into worksheets in ERS, and then forward these to the appropriate investigators and staff. Business managers cannot certify effort for investigators or staff in the system. Investigators review and certify effort forms for their effort, as well as for staff paid 100 percent on the investigator’s sponsored funds.

**Cost-sharing and Reporting:** Cost sharing commitments must also be tracked and accounted for through ERS. GCO compares the cost sharing commitment of investigators with their appointments and their effort reports. If an investigator’s effort report does not show as much cost sharing as has been committed, the GCO, with assistance of the unit, either corrects the effort report or negotiates a reduction of the cost sharing effort with the sponsor(s).

At UIUC, for the six-month periods ending December and June, GCO generates an after-the-fact confirmation for each investigator to sign, similar to the reports generated at UIC. The form includes all direct charges (salary, wages and other) and cost sharing effort for each sponsored project. By signing the semi-annual confirmation, the investigators confirm, among other things, that the salaries and wages charged to the project reasonably reflect actual effort. Labor distribution data in the Activity Reporting System (ARS) is a piece of the campus effort reporting system. GCO grant specialists and coordinators record cost sharing commitments in the university’s web-based Cost Share application for new sponsored projects or amendments to existing sponsored projects with identified cost sharing commitments. GCO is in the process of implementing procedures for periodic post-audit of labor redistribution transactions.

Similar to the UIC process but using a different system, GCO compares the cost sharing commitment of investigators with their appointments and their effort reports via ARS. If an investigator’s effort report shows less cost sharing than has been committed, GCO, with the assistance of the unit, either corrects the effort report or negotiates a reduction of the cost sharing effort with the sponsor(s).
Effort-commitment Amendments and Sponsor Notification: Sponsors must be notified of changes to effort commitments at the time of the initial award and during the course of the project, consistent with the individual sponsor’s notification requirements. Many sponsors have a notification threshold. For example, NIH requires written notification of changes to effort commitment of 25 percent or more prior to the actual change in effort. NSF has a notification threshold of 10 percent. Departments must manage all changes to original effort commitments based on the regulations of the awarding agency, requirements listed on the Notice of Award issued by GCO, and other applicable policies. If there is a change in effort, the overall project must be re-evaluated, including scope of work, other effort commitments, budget allocations, and potential increases or decreases in cost sharing commitments.

Faculty Feedback
Calculating effort and effort reporting requirements are confusing for some faculty. It is not always clear what activities are included within their total university effort. For example, service on review panels and other advisory activities for federal sponsors is an important component of research, but effort for these activities is not included in a faculty member’s total effort for reporting purposes.

To facilitate accurate effort reporting, GCO should develop a post-award checklist that includes effort committed to a sponsored project. Researchers should sign the checklist (via the PI portal) in acknowledgement of effort reported at the time a grant is awarded and again before the award funds are distributed.

Faculty stressed that the ideal time to communicate with an investigator is immediately before the grant is awarded or when the Notice of Award is received.

Staff Feedback
GCO staff do not view compliance as their primary responsibility, but they do provide tools and resources to help campus units ensure compliance with the rules and regulations governing sponsored projects. Staff members strive to find a balance between customer service and compliance activities. This is most challenging for audit activities.

GCO has no control over audit schedules, which staff find frustrating as accommodating new audit requests often result in priorities changing. GCO staff are responsible for managing the annual A-133 federal compliance audit and overseeing various sponsor compliance audits through the year (e.g., City of Chicago, Department of Justice, etc.). The University of Illinois is labeled as a “high risk” institution due to previous audit findings. As a result, many sponsors choose to audit regularly. For example, the City of Chicago has conducted four separate audits at UIC in the past year.

GCO staff continue to evaluate the electronic forms, data, and systems used in effort reporting for opportunities to improve their effectiveness. Additionally, internal tools have been developed to track and manage compliance metrics reports.
Challenges: Communication

Communication between faculty, departmental business staff, and the GCO staff who oversee compliance is lacking. The policies and procedures guiding compliance activities are complex, and it is important that faculty and staff understand expectations so that they can be held accountable for effort reporting, as well as other compliance requirements. Effective communication is an important aspect of any compliance activity and should be used to clearly differentiate between the different reporting requirements and processes. Different effort reporting requirements and processes on sponsored projects include the Annual Report of Non-University Activities (RNUA) and the positive time reporting mandated by the State Officials and Employees Ethics Act.

There appear to be divisions across campus lines and even between the GCO units on each campus. It is difficult to understand why these divisions persist given that there are no differences in the governing rules and external forces that guide policies and procedures on each campus. For example, both UIC and UIUC fall under the purview of OMB Circular A-133 guidelines for the verification of direct costs on sponsored projects. Yet each of the campuses has its own system for effort reporting and relies on a different mechanism for the confirmation of expenditures.

There are continued opportunities for increasing efficiency through collaboration and the standardization of processes across GCO, but there has also been significant effort to streamline business processes and leverage knowledge. Furthermore, process improvement efforts to create standard policies and procedures are often resisted. Differences in processes appear to be based on history rather than need, and it is not clear how or why different procedures came into existence. This lack of consistency in processing and roles/responsibilities creates confusion.

University leadership should clearly articulate expectations of research administration units and promote a culture of shared responsibility for compliance activities.

The university needs to promote a culture of shared responsibility built on common values. University leadership must clearly articulate expectations of research administration units and campus departments for sharing the responsibility of sponsored project administration and conducting business in an efficient manner, which ensures compliance without a dedicated effort to do so. Without a shared understanding of responsibility, GCO will continue to be perceived as overemphasizing compliance and campus units will continue to be frustrated with inefficient and cumbersome policies and procedures.

ORS/OSPRA and GCO on each campus should communicate regularly and work together to identify opportunities for the improved alignment of processes across campuses and to ensure consistent research support from proposal submission to award closeout. University leadership must hold units accountable for process efficiency.
Challenges: Training

While GCO routinely conducts campus-wide training, efforts targeted specifically at faculty are minimal. GCO has benchmarked existing training programs against other institutions, but does not currently have the resources to enhance current efforts.

University leadership should provide additional resources for the development of an enterprise-wide sponsored projects training program, as well as support the creation of dedicated positions responsible for the oversight of training efforts.

A strong training program for faculty is critical. Faculty should be educated on the importance of effort reporting, so that they understand why reporting is necessary and are more willing to go through the trouble of certifying their effort.

Challenges: Information Technology

Faculty would like increased access to key university data for sponsored projects, both for pre-award proposal submission and post-award administration. According to faculty, institutional salary information is not easily accessible. Faculty members were not aware that access to campus-wide salary data could be requested through AITS.

An integrated electronic research administration system should streamline effort reporting processes across the campuses and ensure consistency in the data collected.

The ideal system would interact with Banner to automatically obtain institutional base salary (IBS) information. Additionally, an integration of effort reporting with the semi-annual confirmation of expenditures would simplify the reporting process and reduce the amount of time faculty members spend on administrative tasks.

5. Award Closeout

Grants are considered closed when all the work has been performed to the sponsor’s satisfaction or upon the termination date specified in the award. Closeout is an important end point in grants accountability. It helps to assure that grantees have met all of the grant’s financial and reporting requirements. A well-defined process is necessary to ensure that sponsoring agencies receive the required final technical and financial reports within the parameters established in the terms and conditions of the awards.

Staff Roles and Responsibilities

On the Chicago campus, the GCO Cash Management team is responsible for overseeing the award closeout process. The team comprises three FTE: one Assistant Director, Cash and Receivables Management and two Cash Management Specialists. Staff is responsible for the receipt and deposit of sponsored project payments and the application of the funds to the appropriate sponsored projects in Banner. Additionally, staff is responsible for the management of accounts receivable and the resolution of delinquent transactions.
The restructuring of the UIC GCO office over the past six years has expanded its cash management resources. The responsibilities of staff specializing in a particular area have become more general, such that staff who were not involved in award closeout in the past have quickly learned closeout policies and procedures. GCO recognized that there were opportunities to improve closeout activities, so staff members have engaged campus units to review and revise processes.

On the Urbana campus, four FTE are responsible for award closeout: one Assistant Director, Closeout and Accounts Receivable; one Senior Coordinator, Federal Awards; one Coordinator, Federal Awards; and one Grants Specialist, Award Closeout.

Process Overview
The grant closeout is a critical part of the life cycle of a grant. Preparation for closeout should begin 3 months prior to the end date of the grant in order to accurately forecast expenses and make any adjustments that may be needed. It is also a point where many investigators realize they need to apply for no-cost extensions.

GCO works with the investigator and departmental business manager to coordinate the award closeout process. Different requirements and procedures are necessary for the different types of grants or contracts, the requirements of the award, and the sponsors that may be involved. The investigator provides technical reports and/or deliverables to the sponsor within the specified timeframe, or obtains the necessary extension. A copy of the report transmittal letter is sent to the GCO. The investigator must disclose inventions in accordance with university regulations and as required by the sponsor.

Status Notifications: A computer-generated Notice of Terminating Accounts is sent to units by GCO 90 days before the expiration of a sponsored project. The notice requests information relative to award closeout, including:

- Will the project be completed as of the termination date?
- Will the project continue with additional funds?
- Will the project continue under a new award number?
- Will the project be incomplete and need a no cost extension?

Units must inform GCO if they have information about the continuation or renewal of a project. If not, the closeout procedures begin with the expiration date of the project. Generally, projects are to be closed within 90 days of expiration.

Documentation: The unit responsible for the project is asked to provide the following information:

- Status of the final technical report
- A listing of invention disclosures or an indication that there were none
- Final subaward invoice voucher(s) signed by an appropriate departmental representative
- Final inventory of federally-titled equipment, if any
• For federal non-research projects only, an accounting of unused, expendable supplies, including expensed equipment with an aggregate value of $5,000 or more
• An indication that all charges to the project have been recorded or a listing of any pending and obligated costs
• Program income reports

**Equipment Resolution:** Equipment costing less than $5,000 is generally not reported to sponsors. However, some sponsors request a summary of all equipment transactions, which is typically provided annually and at the end of the award. Investigators and departmental business managers need to be aware of whether prior approval from the sponsor is required to purchase additional equipment that was not listed in the original grant proposal. Lack of prior approval creates reporting delays, because non-approved items need to be removed from the grant prior to submitting the report to the sponsor. Additionally, there are instances when the sponsor retains ownership of the equipment purchased with sponsored project funds, rather than the State of Illinois. University policy prohibits splitting equipment expenses between multiple accounts if the State does not have ownership of the equipment.

**Cost-overrun Resolution:** The unit is also responsible for clearing cost overruns within 90 days after the project has terminated. For federally sponsored projects, financial-accounting records must identify any write-offs of overruns to appropriate institutional funds that remain at project termination.

A cost overrun is an expenditure made in excess of funding for a given project after:

• All corrections are made
• All allowable costs are removed
• All costs (except final report costs) incurred after the project termination date are removed

**Final Requirements and Financial-status Review:** GCO is responsible for ensuring that all of the university’s obligations for the project have been met by coordinating with the investigator and departmental business manager to provide the necessary reports and any other documentation that fulfills this responsibility. GCO staff contact the department 30 days prior to the award end date to address the final posting of expenses and remove any overdrafts or commitments. At this time, due dates for all final materials are established, based on the final billing deadlines of the sponsor.

GCO grant coordinators and specialists review expenditures for appropriateness, verify indirect costs, and prepare final billings to the sponsor or, if required, prepare a final financial status report. Additionally, staff prepare a cost sharing report if applicable, and then reconcile all payments to Banner. In the case of projects with subawards, GCO ensures that the subrecipients have submitted a final billing and that it has been paid.

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32 All property at the University, regardless of funding source, to which the University acquires title is subject to the regulations of the Illinois Department of Central Management Services as “State-owned property.”
**Closeout Notifications and Reporting:** Finally, GCO staff send an email notification to the investigator and the department to verify that all applicable final reports have been completed. Closeout staff prepare any necessary releases and final government property reports. They assign refunds, rebates and credits to the appropriate accounts. On each campus, staff coordinate with the Office of Technology Management to prepare patent, invention, and copyright reports. For example, the Department of Health and Human Services utilizes an electronic process for patent reporting that is coordinated by section staff.

The following closeout documents are submitted to the sponsor, as required:

- Final billing and/or expenditure report
- Patent report
- Equipment report
- Release and assignment forms

**Grant-fund Closure:** When all grant funds have been expended, billed, and received and all expenditures, invoices and payments are reconciled, GCO then closes general and subsidiary ledger accounts, de-obligates any unused balances, and returns funds to the sponsor for all cost reimbursable awards. Staff enter end dates on the grant, fund and index codes in Banner to indicate closeout, and inactivate the fund.

**Transit Items:** Due to strict state deadlines, the state section often completes final billings using a transit recap sheet, which is a sheet that summarizes any transactions incurred or encumbered prior to the end of the award that have not posted in Banner. This can result in transit items billed before they are charged to the fund. Funds cannot be terminated until all transit items have been charged. After the award is fully billed, all invoices are paid, and the fund has a zero balance, GCO staff terminate the grant code.

**Fixed-price awards:** Fixed-price awards with residual cash balances are closed according to university policy. A fixed-price award is one where the sponsor provides the university with a fixed amount of funding to complete a mutually agreed upon scope of work. The amount of the award is based on an estimate of the costs of performing the work, using costing methodology that conforms to federal cost principles and university policy. Once the award is accepted, the investigator is obligated to perform the work, whether or not the funding provided is adequate. However, the investigator is not obligated to return any unused funds. Fixed-price award accounts with positive cash balances are frozen in March of the fiscal year following the end date of the project. When closing the account, GCO assesses F&A on the unexpended balance at the rate calculated by dividing inception-to-date F&A earned by total costs. The residual balance is transferred to a unit fixed-price allowance account established for this purpose.

**Closeout Delays:** Project closeout may be delayed for a variety of reasons, including reporting and the collection of funds. Closeout staff members generate a monthly report of awards that have gone past the Banner end date but are not yet closed out. Within the report, the responsible section staff member parses the data. To facilitate final closeout, grant specialists and coordinators are responsible for following through on open items for awards ending in the previous fiscal year and for pursuing the necessary actions to facilitate the closeout of older awards.
The university is subject to the Illinois State Collection Act of 1986\(^3^3\) and the Statewide Accounting Management System (SAMS) Subsection 26: Accounts Receivable Reporting\(^3^4\). These laws require the university to follow the State’s clearly defined collection process for delinquent accounts. Collection of past due balances for sponsored projects is primarily the responsibility of GCO. However, in some cases, GCO collaborates with unit business managers and/or investigators if past due balances relate to programmatic deliverables. The primary tool to manage receivables at UIC is the AR Database, which was developed internally within GCO. UIUC, on the other hand, utilizes reports and data extracted from Banner.

**Award Termination:** Throughout the award closeout process, GCO works with ORS/OSPRA to confirm that the award is ready to be closed out. Staff members confirm that all final deliverables have been received and that cost share has been fully accounted for. Finally, when the award has been terminated, an email confirmation is sent to the department.

All financial, technical, and other records pertinent to state and federal sponsored projects must be retained for 3 years following the submission of the final financial report, unless the terms of the award provide for a different period. Electronic or copied paper versions of documents may be used in place of the original records. Record retention for other sponsors is as specified in the award or in the sponsor’s policies. If litigation commences within 3 years of the end of the project or project period, records must be retained until the litigation reaches its final outcome.

**Faculty Feedback**
The award closeout process requires the investigator to complete a number of tasks, and it is not always clear who is responsible for which tasks.

> **GCO should provide investigators with an award closeout checklist that highlights their respective tasks and the timeline for completing them. Additionally, GCO should conduct an “exit interview” with the investigator and unit staff to review the checklist and ensure that all of the necessary information has been documented and that the award is ready for closeout.**

One-on-one meetings between investigators, unit staff, and GCO staff can help to improve the coordination of award administration and closeout activities. They provide GCO with the opportunity to inform investigators of closeout and reporting requirements. Entrance and exit interviews have the additional benefit of providing GCO with information that may help to identify issues sooner and reduce future problems.

**Staff Feedback**
Award closeout is an area with significant challenges for GCO staff. The closeout process is extremely time consuming, and GCO struggles with not having enough staff to effectively


manage the closeout of all sponsored projects. As a result, there is a risk that the service provided by GCO to the campuses is inadequate.

GCO staff on the Chicago campus highlighted several challenges in accounts receivable and award closeout processes:

- **Processing of checks**: Although a majority of federal sponsors submit payment through an electronic fund transfer, there are still a significant number of sponsors that submit a check for payment. The processing of checks is time-consuming and requires a number of manual tasks be completed.

- **Non-responsive sponsors**: GCO is typically successful with the collection of outstanding payments when unit staff members are actively engaged. There are sponsors, however, that do not respond to attempts to collect payment.

- **Large volume of documents**: There are a significant number of documents required for the award closeout process. The management of documents is cumbersome.

- **Faculty departures**: GCO is responsible for the closeout of awards for faculty that are no longer with the university. Often GCO is not notified of faculty departures. There have been instances where receipt of a current award is at risk due to the incomplete closeout out of prior awards.

GCO staff noted that the Chicago campus would benefit from the implementation of a standardized closeout process. GCO recently initiated a Daily Process Improvement (DPI) project for award closeout, but process improvements have not been fully implemented. If successful, DPI will enable GCO to achieve timely closeout for all sponsored projects (i.e., within 90 days of the project end date). Training is a significant component of the DPI. GCO will educate investigators and departmental business managers on award closeout procedures. Closeout activities must also begin earlier to enable GCO staff to process final transactions (e.g., final cash draw, billing, journal entries). Ideally, closeout activities would be completed at least 30 to 60 days after a project ends. Cooperation from investigators and departmental business managers is critical for timely award closeout.

**Challenges: Information Technology**

The systems used to manage accounts receivable on the Chicago and Urbana campuses differ. This is inefficient and complicates university-wide reporting.

| GCO should consider adopting a single, unified system that can accommodate minor variances in processes that reflect the unique requirements of each campus. The system should send investigators various reminders for award closeout task deadlines. |

Investigators currently receive an automated notification 90 days prior to the Banner award end date. GCO should consider providing additional reminders for award closeout task deadlines. Ideally, an electronic system should automatically send reminders to investigators.
6. Compliance

As a recipient of federal grant funds, the university must comply with all applicable federal statutes, regulations, and policies. Research administration units share the responsibility for compliance with the investigators and departments receiving sponsored awards. Compliance activities are found throughout both pre- and post-award processes, including:

- Expenditure monitoring
- A-133 and external audits
- Small business reporting
- Financial reporting
- Subrecipient monitoring
- Equipment monitoring
- Cost sharing
- Effort reporting

Staff Roles and Responsibilities

GCO on both the Chicago and Urbana campuses has dedicated staff for compliance activities, which underscores the importance of this function. Compliance staff members are involved in the effort reporting process as discussed previously, but also have a role in other monitoring and reporting activities.

On the Chicago campus, there are four FTE dedicated to compliance activities: one Assistant Director, one Senior Coordinator, one Coordinator, and one Specialist. Staff is responsible for the testing and monitoring of unallowable costs on sponsored projects, assist with the A-133 audit and other sponsor audits, coordinate effort reporting, and monitor subrecipients.

On the Urbana campus, there are six FTE dedicated to compliance activities: one Associate Director, two Assistant Directors, two Senior Coordinators, and one Coordinator (this position is currently vacant). The Urbana GCO is responsible for the university-wide management and coordination of the A-133 audit. Similar to their UIC counterparts, staffs liaise with campus units for the A-133 audit and other audit activities, regularly review sponsored project expenditures, and monitor subrecipients. The Audit and Compliance team within the UIUC GCO has developed over the past five years. Staff members take a collaborative approach, often working together to provide input and assistance in the remediation of issues. This approach is beneficial in that campus units have access to a team of resources, and this reduces disruption of service if one staff member leaves.
UIC Grants & Contracts Office (GCO)
UIUC Grants & Contracts Office (GCO)
Process Overview

According to Section C.4.d (1) of OMB Circular A-21, *Cost Principles for Educational Institutions*, the recipient of a federal project is responsible for ensuring that the costs charged to a sponsored agreement are allowable, allocable, and reasonable under the cost principles stated. This establishes the university’s responsibility for compliance with these and other cost regulations.

*Expenditure Monitoring:* The investigator and the department are responsible for complying with the applicable sponsor requirements for sponsored projects and the prudent management of all expenditures and actions affecting the award. Documentation for each expenditure or action affecting an award must reflect appropriate organizational reviews or approvals, which should be made in advance. Organizational reviews are intended to help assure that expenditures are allowable, necessary, and reasonable for conducting the project. Investigators and their departments are also responsible for ensuring that the costs assigned to federal projects are compliant with sponsor requirements. Restricted cost categories and other inappropriate charges can be readily detected in audits and any resulting disallowances must be reimbursed to the federal government. GCO assists investigators and their departments in the review of sponsored project expenditures when requested. GCO coordinates the semi-annual expenditures confirmation done by the department and the PI confirms the result. GCO also does periodic expenditure testing.

*A-133 and External Audits:* In all cases of financial audits or reviews of sponsored projects, GCO is the official liaison between auditors and any university unit. The number of audits conducted each year is increasing. The federal A-133 audit is the largest audit conducted at the university and it takes approximately 10 months out of every year to complete. The audit is coordinated through GCO, which notifies departmental business managers when a project in their unit is selected for the audit. GCO staff members facilitate cooperation between the A-133 audit firm, the GCO, and units to fulfill audit requests. Sponsors occasionally request a program-specific audit. GCO also coordinates these activities, including the participation of the unit and the investigator.

On average, GCO receives between two to ten audit-related requests per week. UIUC currently has twelve active audits in addition to the ongoing A-133 audit, including seven federal audits, two state audits, and three private audits. There are also numerous subrecipient audits in progress. In four of these, the University of Illinois is the subrecipient; in an additional ten, other institutions are the subrecipient.

*Small business Reporting:* GCO is also involved in university-wide compliance efforts, such as semi-annual small business reporting. Since the university has federal contracts over $500,000, GCO gathers data for the submission of a Small Business Report to federal agencies. Reports are submitted twice a year and identify expenditure categories for which a small business vendor can be utilized. The data for the report are gathered through a series of financial reports that detail expense transactions for that category of award by vendor.
Financial Reporting: GCO assists other OBFS units in fulfilling financial reporting requirements. Previously, OBFS Accounting and Financial Reporting was responsible for reporting on federal agricultural appropriations, but GCO is now handling this responsibility, which is increasing the current workload.

State regulations require the university to comply with generally accepted accounting principles (GAAP) as established by the Governmental Account Standards Board (GASB) for state and local government entities. These require the university to accrue accounts receivable at fiscal year-end and record an estimated allowance for uncollectable receivables. State of Illinois GAAP reporting is completed for federal funds that are passed through a state agency to the university. The reconciliation process for federal pass-through transactions is extremely tedious. Over 10,000 transactions must be recorded with the Illinois Comptroller’s State Offset System. GCO spends an estimated 300 person-hours per year compiling data for the university’s annual financial report to the State to ensure that federal expenditures properly reflect their correct funding source.

Subrecipient Monitoring: GCO grant specialists and coordinators initially receive subrecipient invoices and verify appropriate Banner C-FOAP coding. Staff then route invoices to the investigator and unit for review and approval. After departments return department-approved subrecipient invoices to OBFS Payables, GCO approves the invoices via Banner queries, prior to payment. Compliance staff members often assist the specialists and coordinators in this process. Additionally, compliance staff verifies that subrecipients have undergone required audits and confirm that current A-133 audit reports are on file. Staff members work to resolve any subrecipient audit issues. See the “Subcontracts” section for additional information about subrecipient monitoring.

Equipment Management: The purchase or fabrication of equipment that is used primarily on a federally sponsored project is allowable as a direct charge if specific conditions are met. GCO approves equipment acquisitions of $5,000 or more on all sponsored projects except those funded by PHS and NSF ($10,000 or more), State of Illinois sponsored projects ($1,000 or more), and fabrications ($500 or more). GCO approval is also required for all equipment leases or rentals for sponsored projects.

GCO is responsible for the oversight of all government-owned property that has been acquired under the terms of a sponsored agreement in accordance with OMB Circular A110, Federal Acquisition Regulations (FAR), and sponsored project terms and conditions. Staff use Banner to record both fixed and movable assets of the university. In collaboration with GCO, University

35 Federal requirements for procurement of equipment and supplies on a sponsored project are available at http://www.obfs.uillinois.edu/cms/one.aspx?portalId=909965&pageId=913917.


37 The Federal Acquisition Regulation (FAR) is the principal set of rules and regulations issued by federal agencies to govern the purchase of goods and services by the government. When a federal agency issues a contract or a proposal, it will specify a list of FAR provisions that apply to that agreement. Additional information is available at http://www.acquisition.gov/far.
Property Accounting maintains government property control records in the Property System and is responsible for:

- Requesting university property control numbers and distributing property control number tags to units
- Monitoring government titled inventories
- Responding to government inquiries
- Reporting lost, damaged, or destroyed property
- Requesting disposition instructions for property that is no longer usable or in excess to the needs of the university
- Requesting transfer of government titled property to the university

Units are required to take a physical inventory of all property, including government titled property, and complete inventory reconciliation every two years. Any government property that is unusable, surplus, or missing is reported to University Property Accounting and Reporting, which updates the system.

Periodically, GCO prepares government property management reports for each federal agency by sponsored agreement. Each has its own requested format and requirements. Reports are provided during the closeout process of the award. Additionally, GCO prepares special reports upon request.

Investigators leaving the University of Illinois sometimes continue their research at another university. Accordingly, they can request that the equipment purchased with their sponsored research funds be transferred to the other university. The transfer of sponsored project equipment is allowable with the approval of the unit head, college dean, and the receiving institution. On the Chicago campus, the Vice Chancellor for Research must also approve the transfer. To request a transfer of equipment, the investigator must complete the Request to Permanently Transfer Sponsored Project Equipment with Researcher form, which requires GCO approval. Equipment may also be loaned to another institution of higher education for a limited period if the equipment is essential to the continuation of the sponsored project. The duration of the loan agreement is limited to the period of performance of the sponsored agreement or the termination of employment of the University’s former researcher, whichever is earlier.

**Staff Feedback**

The procedures that make up the official property control reporting for government property are the responsibility of GCO. However, more collaboration between the units and GCO is needed, especially for equipment transfers. Often investigators leaving the University of Illinois to conduct research at another institution take sponsored project equipment with them and do not complete the necessary paperwork. It can take months for GCO to learn that the investigator has left the university, which creates a challenge for equipment reporting and compliance with federal property control regulations. Equipment is often identified as “missing” during the biennial inventory and, if possible, it is tracked down. If it is found that a departing researcher took the equipment to his or her new university, a request to transfer the equipment may still be completed if appropriate.
Although GCO staff recognize that the biennial equipment inventory is time-consuming for many units, it is an important aspect of government property control procedures and required by OMB Circular 110 Section C34f(3). It is important that unit staff members conducting the inventory are properly trained to avoid inaccurate equipment records. For example, unit staff must investigate all equipment in their unit’s facilities. There have been instances where a piece of equipment is verified when in fact the item cannot be located. Discrepancies in equipment records sometimes lead to audit issues, which could cost the university money. Equipment records are part of the university overhead that is used in calculating the Facilities and Administrative (F&A) rate that is charged to sponsored projects. If the calculation is wrong and the University is found to have claimed unsubstantiated costs, the rate could be reduced.

Staff identified additional outstanding challenges for equipment management that need to be resolved, asking:

- Who is responsible for completing and approving the transfer of equipment of investigators with dual appointments in a center or institute? Is it the investigator’s home department or the department that has been assigned the sponsored project?
- Is there a review mechanism or sign-off process for departing faculty? If so, can a discussion on equipment transfer be included?
- What special considerations are needed to transfer equipment that falls under export control regulations or where data security is a concern?

GCO is working with OBFS Property Accounting to develop educational materials for the policies and procedures governing equipment management in response to several audit findings indicating that the university did not consistently follow property management regulations.

The increased scope of the A-133 audit is a continual challenge for GCO staff. Responding to the requests of the auditors is a demanding, time-consuming process. Staff members often spend a significant amount of time clarifying federal regulations for auditors, as well as helping faculty and departmental business staff understand A-133 requirements. The lack of consistent business and financial processes between units and across the campuses further creates additional challenges.

GCO staff members are a key resource available to departments and units. Staff are available to troubleshoot problems, to help researchers understand compliance issues, and to provide recommendations on questionable actions. Additional training is available to departmental business staff members on both campuses who are new to research administration. Courses provide an introduction to the principles of the business and financial information needed to ensure the compliant management of sponsored awards, as well as to adhere to federal regulations, agency requirements, and university policies.
Appendix

A. Charge Letters

B. Meeting Schedule and Attendees

C. Revised Process Flow Charts: Pre-Award

D. Process Flow Charts: Post-Award

E. UIC Proposal Approval Form (PAF)

F. UIUC Proposal Transmittal Form (PTF)
Appendix A
Charge Letters
Office of the President
364 Henry Administration Building
506 South Wright Street
Urbana, IL 61801-3689

Robert A. Easter
President

December 10, 2012

Lawrence Schook
Vice President for Research
346 Henry Administration Building
506 South Wright Street
Urbana, IL 61801

Dear Larry:

One of the challenges confronting the University is the overall administration of our research portfolio. The University encourages its faculty and postdoctoral fellows to pursue external support for scholarly activities, which is generally provided through federal and private grants. It is our expectation that faculty who are successful in competing for external funding should be able to concentrate on their research and not be burdened by the administration of managing their research.

The administrative processes supporting our research portfolio have become more complicated and involved as the University grows in complexity as a multi-campus research institution. Regulatory requirements, financial pressures, and operating constraints continue to increase the administrative burden for researchers, and the supporting infrastructure has not adequately kept pace.

As Vice President for Research and Senior Research Officer, you are responsible for the University’s vast research enterprise. As such, I charge you with the task of reviewing the research administration activities at the University, with a primary focus on the pre- and post-award processes. The intent of the review is to find ways to streamline processes, increase standardization across campuses, and identify ways to reduce the administrative burden on researchers. 

Thank you for your leadership and support. I look forward to your report and recommendations.

Sincerely,

Bob

Robert A. Easter
Office of the Vice President for Research  
346 Henry Administration Building  
506 South Wright Street  
Urbana, Illinois 61801  

Lawrence B. Schook  
Vice President for Research  
Edward William and Jane Marr Gutgsell Professor  

January 16, 2013  

Ahlam Al-Kodmany, Director of Financial Operations, Institute for Health Research and Policy  
Michael R. Anderson, Senior Research/eRA Coordinator, Office of Research Services  
Brian K. Kay, Professor and Head, Department of Biological Sciences  
Amneh Kiswani, Assistant Director, Pre-Award, Office of Research Services  
Julie C. Kong, Associate Director of Research Services, School of Public Health Administration  
Kristy N. Kuzmuk, Director of Research Operations, OVPR  
Mee Mee Lee-Choi, Associate Director, OBFS-Grants and Contracts  
Richard J. Meisinger, Jr., Associate Vice President for Research, OVPR, (Chair)  
Robin J. Mermelstein, Professor of Psychology and Director, Institute for Health Research and Policy  
Kenneth B. Moore, Coordinator of Grants and Contracts, Office of Research Services  

Dear Colleagues,  

The administrative burden on researchers at the University of Illinois has grown over the past decade as compliance requirements have become more complex, and resource constraints have limited administrative support across the campuses. In a December 3, 2012 commentary in The Chronicle of Higher Education, Alan I. Lesher and Steven J. Fluharty noted that “a survey released in 2007 by the Federal Demonstration Partnership, an association of federal agencies, research universities, and research-policy groups, estimated that 42 percent of American researchers’ time is spent in administrative tasks, compared with 18 percent two decades earlier.”  

President Easter has charged me with the task of reviewing the research administration process and procedures at the University, with the objective of streamlining processes and minimizing the administrative burdens placed on the faculty and staff who are the foundation of the University’s considerable research enterprise. This review will begin with the Chicago and Urbana campuses. I invite you to participate in the review of the pre- and post-award processes on the Chicago campus.  

As President Easter outlined in the attached letter, the intent of the review is to find ways to streamline processes, increase standardization across campuses where appropriate, identify the nature of the administrative burdens on researchers, and suggest ways to reduce them. The anticipated outcomes of the review include:  

- Identification of regulatory constraints and recommendations to minimize administrative burden;  
- Evaluation of research administration support infrastructure on the campuses;  
- Identification of opportunities for standardization of processes across campuses where appropriate and beneficial to the campuses;
• Assessment of the adequacy of staff levels, classifications, and level of professionalism, and identify staff training opportunities where appropriate;
• Review of compliance protocols and identification of ways to simplify implementation;
• Implementation of process improvements to increase efficiency and effectiveness of grant submission and administration within the constraints of federal and state regulations;
• Assessment of propensity for risk in our regulatory environment
• Assessment of best practices from peer institutions and adoption where appropriate; and
• Assessment of the impact of a new electronic system on processes (to the extent that a new system or systems are in place)

This project will be guided by a committee of executive sponsors: Vice Chancellors for Research Mitra Dutta and Peter Schiffer, Senior Associate Vice President for Business and Finance Michael Bass, and Professor and Senate Chair Matthew Wheeler. The review panel will prepare a report that outlines its findings and provides recommendations for change and opportunities to streamline processes. Recommendations about operations that are agreed to by the relevant staff members and that do not require formal approval by higher authorities will be implemented immediately.

Thank you for participating in this very important review. I ask that you complete your work by June 30, 2013. I look forward to your report and recommendations.

Sincerely,

[Signature]

Lawrence B. Schook
Vice President for Research
Edward William and Jane Marr Gutgsell Professor

Attachment

cc: President Robert A. Easter
Chancellor Paula Allen-Meares
Chancellor Phyllis M. Wise
Vice Chancellor Mitra Dutta
Vice Chancellor Peter E. Schiffer
Senior Associate Vice President Michael B. Bass
Office of the President  
364 Henry Administration Building  
506 South Wright Street  
Urbana, IL 61801-3689

Robert A. Easter  
President

December 10, 2012

Lawrence Schook  
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346 Henry Administration Building  
506 South Wright Street  
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Lawrence B. Schook  
Vice President for Research  
Edward William and Jane Marr Gutgsell Professor

January 16, 2013

Penny D. Broga, Associate Director for Business Affairs, School of Integrative Biology  
Roy H. Campbell, Professor, Computer Science  
Lyndon J. Goody, Associate Vice Chancellor for Research/Director, Division of Animal Resources  
Linda Andrea Gregory, Associate Director of Personnel Operations, OBFS  
Patricia Marie Jones, Associate Director for Research, Beckman Institute  
Kristy N. Kuzmuk, Director of Research Operations, OVPR  
Linda Learned, Associate Director/Interim Director, Office of Sponsored Programs & Research Administration  
Richard J. Meisinger, Jr., Associate Vice President for Research, OVPR, (Chair)  
Matthew B. Wheeler, Professor, Animal Sciences, Bioengineering

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Urbana (217) 265-5440 · E-Mail: schook@uillinois.edu
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Sincerely,

Robert A. Easter
Appendix B
Meeting Schedule & Attendees
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<td>Amneh Kiswani, Julie Kong, Dick Meisinger, Robin Mermelstein, Ken Moore, Francell Layne, Teresa Johnston, Cynthia Tom-Kleba, Laura Litman, Courtney Grussing, Zainab Olaosebikan</td>
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<td>5/2/13</td>
<td>Proposal Submission Group</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Linda Gregory, Patty Jones, Kristy Kuzmuk, Linda Learned, Dick Meisinger, Kathy Dams, Kim Walsh, Kamil Tamimie, Courtney Grussing</td>
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<td>5/14/13</td>
<td>Institutional Biosafety Committee</td>
<td>UIIC</td>
<td>Ahlam Al-Kodmany, Michael Anderson, Kristy Kuzmuk, Mee Mee Lee-Choi, Dick Meisinger, Robin Mermelstein, Mary Bowman, Soudabeh Soura, Kary Gomez, Courtney Grussing, Zainab Olaosebikan</td>
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<td>5/21/13</td>
<td>Award Setup</td>
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<td>Ahlam Al-Kodmany, Michael Anderson, Amneh Kiswani, Kristy Kuzmuk, Mee Mee Lee-Choi, Dick Meisinger, Robin Mermelstein, Ken Moore</td>
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<td>5/28/13</td>
<td>Subcontracts</td>
<td>UIIC</td>
<td>Ahlam Al-Kodmany, Mike Anderson, Amneh Kiswani, Julie Kong, Kristy Kuzmuk, Dick Meisinger, Robin Mermelstein, Luis Vargus, Elizabeth Cruz, Karyn Nash, Adrienne Simms, Darlene Tovar, Courtney Grussing, Jennifer Rowan</td>
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<tr>
<td>5/30/13</td>
<td>Institutional Biosafety Committee</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Linda Gregory, Patty Jones, Linda Learned, Dick Meisinger, Matt Wheeler, Linda Arsenneau, Carol Maddox, Tina McGill, Monica Miller, Joanna Shisler, Courtney Grussing</td>
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<td>Institution</td>
<td>Attendees</td>
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<td>6/4/13</td>
<td>Conflict of Interest</td>
<td>UIC</td>
<td>Ahlam Al-Kodmany, Michael Anderson, Anneh Kiswani, Julie Kong, Kristy Kuzmuk, Mee Mee Lee-Choi, Dick Meisinger, Robin Mermelstein, Ken Moore, Jacquelyn Jancius, Scott Mac Ewen, Mark Grabiner, Courtney Grussing, Zainab Olaosebikan</td>
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<td>6/10/13</td>
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<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Linda Gregory, Patty Jones, Linda Learned, Dick Meisinger, Matt Wheeler, Robin Beach, Amy Brooks, Sarah Lorbiecki, Alison Morgan, Julie Robinson, Kamil Tamimie, Courtney Grussing</td>
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<td>6/19/13</td>
<td>Institutional Animal Care &amp; Use Committee</td>
<td>UIC</td>
<td>Anneh, Kiswani, Julie Kong, Dick Meisinger, Robin Mermelstein, Ken Moore, Mary Bowman, Soudabeh Soura, Kary Gomez, Courtney Grussing, Zainab Olaosebikan</td>
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<td>7/1/13</td>
<td>Data &amp; Enterprise Systems</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Linda Gregory, Kristy Kuzmuk, Linda Learned, Dick Meisinger, Matt Wheeler, Amy Roessler, Cale Doubet, Courtney Grussing</td>
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<td>7/16/13</td>
<td>Award Setup, Financial Reporting &amp; Billing</td>
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<td>Ahlam Al-Kodmany, Michael Anderson, Brian Kay, Anneh Kiswani, Julie Kong, Mee Mee Lee-Choi, Dick Meisinger, Robin Mermelstein, Ken Moore, Edward Seighman, Fuller Lyons, Courtney Grussing, Zainab Olaosebikan</td>
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<td>Effort Reporting</td>
<td>UIC</td>
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<td>Payments and Closeout</td>
<td>UIC</td>
<td>Ahlam Al-Kodmany, Mike Anderson, Brian Kay, Anneh Kiswani, Julie Kong, Kristy Kuzmuk, Mee Mee Lee-Choi, Dick Meisinger, Ken Moore, Vanessa Peoples, Fuller Lyons, LaShawnda Hall, Courtney Grussing, Zainab Olaosebikan</td>
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<td>8/13/13</td>
<td>Award Setup and Award Administration</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Linda Gregory, Patty Jones, Kristy Kuzmuk, Linda Learned, Dick Meisinger, Kevin Frerichs, Joy Fuller, Alison Morgan, Courtney Grussing</td>
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<tr>
<td>9/13/13</td>
<td>Faculty</td>
<td>UIC</td>
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<td>9/18/13</td>
<td>Compliance</td>
<td>UIUC</td>
<td>Penny Broga, Lyndon Goodly, Linda Gregory, Patty Jones, Linda Learned, Dick Meisinger, Charles Asbury, Ruth Boardman, Tasha Waller-Mumm</td>
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<tr>
<td>9/19/13</td>
<td>Faculty</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Patty Jones, Linda Learned, Dick Meisinger, Matt Wheeler, Jiawei Han, Sally Jackson, Steven Lumetta, Peter Sauer</td>
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<td>12/10/13</td>
<td>Pre &amp; Post Award Task Force Committee</td>
<td>UIC</td>
<td>Ahlam Al-Kodmany, Michael Anderson, Brian Kay, Anneh Kiswani, Julie Kong, Kristy Kuzmuk, Mee Mee Lee-Choi, Dick Meisinger, Robin Mermelstein, Vanessa Peoples, Fuller Lyons, Katina Shepherd, Courtney Grussing, Zainab Olaosebikan</td>
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<td>1/30/14</td>
<td>Pre &amp; Post Award Task Force Committee</td>
<td>UIUC</td>
<td>Penny Broga, Roy Campbell, Lyndon Goodly, Linda Gregory, Patty Jones, Kristy Kuzmuk, Linda Learned, Dick Meisinger, Matt Wheeler</td>
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</table>
Appendix C
Revised Process Flow Charts:
Pre-Award
ACC Member(s)

ACC

Draft/Edit Protocol

Request protocol pre-review from OACIB?

Protocol is submitted to OACIB

No

Consult with PI on protocol design

Yes

Initial data entry and protocol number assignment

Protocol assigned to full committee

Protocol is copied and routed to vet staff

No (this is the norm)

Vet staff review (usually more than one vet)

OACIB Initial Review

Comments from initial review?

Protocol is revised and resubmitted to OACIB

Yes

Additional data entry

Protocol assigned to a subcommittee agenda

Primary/secondary reviewers are assigned

Packet is assembled and copied

Packet is routed to subcommittee reviewers

Subcommittee meetings are held

Subcommittee report is routed back to OACIB

Full committee review packet is assembled

Full committee review agenda is compiled

Agenda and packet routed to each ACC member

Full committee review

Status updated in system/additional data entry

Approval?

CN/DMR?

No

Letter detailing clarifications is generated

Yes

Approval letter is generated

Approval after revisions

Deferral?

CN/DMR?

Yes

Letter detailing clarifications is generated

Deferral letter is generated

Deferral letter routed to PI/designee

Rejection letter is generated

Rejection letter routed to PI

End

Approved protocol and letter are routed to BRL

Copies are filed in a hard copy folder
<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>OSPRA Clerical Assistant initiates process</td>
</tr>
<tr>
<td>2</td>
<td>Anticipation Account Setup (if necessary)</td>
</tr>
<tr>
<td>3</td>
<td>Receipt of Award Documents</td>
</tr>
<tr>
<td>4</td>
<td>Initial Communication and Data Entry</td>
</tr>
<tr>
<td>5</td>
<td>Contract Review</td>
</tr>
<tr>
<td>6</td>
<td>Updating of System &amp; Follow-up Notification</td>
</tr>
<tr>
<td>7</td>
<td>Routing of Award to GCO (Post-Award)</td>
</tr>
<tr>
<td>8</td>
<td>Post Award Setup in Banner</td>
</tr>
<tr>
<td>9</td>
<td>Notification to Start Spending</td>
</tr>
<tr>
<td>10</td>
<td>Start</td>
</tr>
<tr>
<td>11</td>
<td>Provide supp data for proposal to sponsor</td>
</tr>
<tr>
<td>12</td>
<td>Initiate req for anticip (e-form GC-70 throgh workflow)</td>
</tr>
<tr>
<td>13</td>
<td>Receive unit approval to cover commitments</td>
</tr>
<tr>
<td>14</td>
<td>Receive proposal-related info from OSPRA</td>
</tr>
<tr>
<td>15</td>
<td>Banner Data Entry to establish anticipation account</td>
</tr>
<tr>
<td>16</td>
<td>Notify PI that anticipation account is set up</td>
</tr>
<tr>
<td>17</td>
<td>Award documents received by OSPRA</td>
</tr>
<tr>
<td>18</td>
<td>Is NSF/NIH grant?</td>
</tr>
<tr>
<td>19</td>
<td>Is dollar agreement?</td>
</tr>
<tr>
<td>20</td>
<td>No</td>
</tr>
<tr>
<td>21</td>
<td>Yes</td>
</tr>
<tr>
<td>22</td>
<td>Matches agreement w/ UIeRA</td>
</tr>
<tr>
<td>23</td>
<td>No</td>
</tr>
<tr>
<td>24</td>
<td>Yes</td>
</tr>
<tr>
<td>25</td>
<td>Data entry in UIeRA</td>
</tr>
<tr>
<td>26</td>
<td>Assign to award coordinator</td>
</tr>
<tr>
<td>27</td>
<td>PI action necessary?</td>
</tr>
<tr>
<td>28</td>
<td>Send for PI action and approval</td>
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<tr>
<td>29</td>
<td>Yes</td>
</tr>
<tr>
<td>30</td>
<td>No</td>
</tr>
<tr>
<td>31</td>
<td>No</td>
</tr>
<tr>
<td>32</td>
<td>Yes</td>
</tr>
<tr>
<td>33</td>
<td>Response from PI (copy to unit)</td>
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<td>34</td>
<td>Begin negotiation (see dedicated process map)</td>
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<tr>
<td>35</td>
<td>NSF/NIH Expedited Review Start</td>
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<td>36</td>
<td>Budget revision?</td>
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<tr>
<td>37</td>
<td>No</td>
</tr>
<tr>
<td>38</td>
<td>Yes</td>
</tr>
<tr>
<td>39</td>
<td>Special Terms?</td>
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<td>40</td>
<td>No</td>
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<td>41</td>
<td>Yes</td>
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<td>42</td>
<td>Compliance Review</td>
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<tr>
<td>43</td>
<td>No</td>
</tr>
<tr>
<td>44</td>
<td>Yes</td>
</tr>
<tr>
<td>45</td>
<td>Contact unit admin for revised budget End</td>
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<td>46</td>
<td>Yes</td>
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<tr>
<td>47</td>
<td>Negotiate with sponsor (if necessary) End</td>
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<tr>
<td>48</td>
<td>End</td>
</tr>
<tr>
<td>49</td>
<td>End NSF/NIH Grants Expedited Review End</td>
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<tr>
<td>50</td>
<td>Budget Revisions Start</td>
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<tr>
<td>51</td>
<td>Compare proposed to awarded budget</td>
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<tr>
<td>52</td>
<td>Scope red'n if &gt; 10%</td>
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<tr>
<td>53</td>
<td>Decrease</td>
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<td>54</td>
<td>Compose statement of budget impact</td>
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<td>55</td>
<td>OSPRA review of proposed budget, red'n criteria</td>
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<tr>
<td>56</td>
<td>Work with unit admin on final revised budget End</td>
</tr>
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<td>57</td>
<td>Check compliance recs for approvals</td>
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<td>58</td>
<td>Negotiate terms with sponsor</td>
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<td>59</td>
<td>Sign on behalf of UIUC</td>
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<td>60</td>
<td>Route agreement to specialist (end negotiation)</td>
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<td>61</td>
<td>Receive agreement</td>
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<tr>
<td>62</td>
<td>Need sponsor counter signature?</td>
</tr>
<tr>
<td>63</td>
<td>Yes</td>
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<tr>
<td>64</td>
<td>Obtain sponsor countersignature</td>
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<tr>
<td>65</td>
<td>No</td>
</tr>
<tr>
<td>66</td>
<td>UIeRA status update + doc scan/upload</td>
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<td>67</td>
<td>Notify PI/unit of award execution</td>
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<td>68</td>
<td>Physical file pick-up from OSPRA</td>
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<td>69</td>
<td>Log in Excel tracking tool</td>
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<td>70</td>
<td>Distro to PostAward section s(acc to sponsor)</td>
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<tr>
<td>71</td>
<td>Review of award documents</td>
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<td>72</td>
<td>Assign grant code in UIeRA</td>
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<td>73</td>
<td>GCO interface entry (opt) to initate pull from InfoEd</td>
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<td>74</td>
<td>Manual entry of info into Banner to create grant</td>
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<td>75</td>
<td>Fund create/populate attributes</td>
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<td>76</td>
<td>Create index code in Banner</td>
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<td>77</td>
<td>Set up billing event(s) in Banner</td>
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<td>Enter and review budget (paper to Banner)</td>
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<td>Cost Share Review Start</td>
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<td>80</td>
<td>Determine mandatory or voluntary commitment</td>
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<td>Is voluntary?</td>
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<td>Review budget against mandatory reqs</td>
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<td>No</td>
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<td>Yes</td>
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<td>Sponsor allows voluntary?</td>
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<td>86</td>
<td>Yes</td>
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<td>87</td>
<td>Determine type of resources committed</td>
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<td>88</td>
<td>Costshare disallowed, budget revised to exclude</td>
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<td>89</td>
<td>No</td>
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<tr>
<td>90</td>
<td>End</td>
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<td>91</td>
<td>Calculate cost-shared budget</td>
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<tr>
<td>92</td>
<td>Verify cost sharing narrative</td>
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<td>93</td>
<td>Campus resources pledged?</td>
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<td>94</td>
<td>Effort pledged?</td>
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<td>No</td>
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<td>Yes</td>
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<td>3rd party/cash/in-kind pledged?</td>
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<td>No</td>
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<td>99</td>
<td>Ensure clarity of cost share in records</td>
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<td>100</td>
<td>Ensure VCR approval letter in place</td>
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<td>101</td>
<td>Check participant list and effort availability</td>
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<tr>
<td>102</td>
<td>Determine source and obtain commitment letter</td>
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<tr>
<td>103</td>
<td>Generate/send GCO award notification to unit</td>
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<tr>
<td>104</td>
<td>Enter labor distribution</td>
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<tr>
<td>105</td>
<td>Notify faculty of CFOP End</td>
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</table>
Appendix D
Process Flow Charts:
Post-Award
Award Set Up Process

Step 4: Banner Set Up
Step 5: Notification

DRAFT
3/11/09

Executed Award from ORS

Validate/Determine type of Award

New grant and/or fund code needed? Y

Assign new grant and/or fund code

N

Assign to Assistant Director

Assign to Grant Specialist

Receive F&A code

Request F&A code

GS Reviews award documents

Special F&A split code needed? Y

Communicate with Unit/ORS/etc.

N

Missing info or other problem? Y

N

Enter Data into Banner (award info, budget, billing, reporting)

Update UIeRA

Create Notice of Banner Code Assignment

GS sends to AD for review

AD reviews & returns to GS

GS emails Notice to Unit, PI, ORS

END
UIC Effort Reporting Process Flow

Payroll

ERS

Cost Sharing Database

BUSINESS MANAGER
Enters effort commitments into worksheets. Forward to Faculty or Individuals.

FACULTY
Review and certify effort forms for self and staff paid 100% from faculty’s sponsored funds

SELF CERTIFIERS
Review and certification effort

Forms certified

Not Correct

Not Correct
P1 and P2 are two independent processes within GCO related to closeout. If the department does not take an action based on the notice in P1, the grants to be closed will be part of P2.

START P2

1. G&C GS use IDA/ITD to determine grants to be closed this month
2. Communicate with department about disposition of grant
3. G&C Specialist reviews ITD Accounting Statement. Inputs budget and expenditure data on ROE Worksheet
4. G&C Specialist reviews transactions occurring post end date and enters applicable/allowable cost on ROE
5. G&C Specialist uses previously reported ITD expenses. Enters credit on ROE
6. G&C Specialist verifies accuracy of Banner calculated and posted F&A and Tuition Remission
7. G&C Specialist email ROE to Departmental Grants Administrators for Review/Approval
8. Are Changes/Adjustments needed? For applicable updates, Departmental Grants Administrators forward ROE and support documentation to G&C
9. G&C Specialist Makes required updates and emails revised ROE to Departmental Grants Administrators for Approval
10. Communicate with Department to resolve disagreements
11. & 12. G&C Specialist prepares and submits Financial Status Report (FSR) to Sponsor (Funding Agency) in approved format and/or Final Invoice.
13. Go to step 9.5
15. Resolve outstanding issues
16. G&C Specialist sets term date
17. Term Date

END

START P1

1. Terminate letter to Org 90 days prior to end date.
2. Communicate with department about disposition of grant
3. Is grant "ready" to be closed?
4. Communicate with department about disposition of grant
5. Is ROE needed?
6. Are Changes/Adjustments needed?
7. G&C Specialist verifies accuracy of Banner calculated and posted F&A and Tuition Remission
8. G&C Specialist emails ROE to Departmental Grants Administrators for Review/Approval
9. G&C Specialist Makes required updates and emails revised ROE to Departmental Grants Administrators for Approval
10. Communicate with Department to resolve disagreements
11. & 12. G&C Specialist prepares and submits Financial Status Report (FSR) to Sponsor (Funding Agency) in approved format and/or Final Invoice.
12. Resolve outstanding issues
13. G&C Specialist sets term date
14. Term Date

END

Orange = some variability in process: GS use different methods to determine set of closeouts due; GS use discretion to determine when ROE needs to be created and/or updated; GS may or may not use actual checklist; AD may set term date and some time may have passed since Trial Balance Summary was zeroed out

Green = represents a range of issues (e.g. AR, legal, etc.) 6/5/2012

P1 and P2 are two independent processes within GCO related to closeout. If the department does not take an action based on the notice in P1, the grants to be closed will be part of P2.

START P2

1. G&C GS use IDA/ITD to determine grants to be closed this month
2. Communicate with department about disposition of grant
3. G&C Specialist reviews ITD Accounting Statement. Inputs budget and expenditure data on ROE Worksheet
4. G&C Specialist reviews transactions occurring post end date and enters applicable/allowable cost on ROE
5. G&C Specialist uses previously reported ITD expenses. Enters credit on ROE
6. G&C Specialist verifies accuracy of Banner calculated and posted F&A and Tuition Remission
7. G&C Specialist email ROE to Departmental Grants Administrators for Review/Approval
8. Are Changes/Adjustments needed? For applicable updates, Departmental Grants Administrators forward ROE and support documentation to G&C
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11. & 12. G&C Specialist prepares and submits Financial Status Report (FSR) to Sponsor (Funding Agency) in approved format and/or Final Invoice.
13. Go to step 9.5
15. Resolve outstanding issues
16. G&C Specialist sets term date
17. Term Date

END

START P1

1. Terminate letter to Org 90 days prior to end date.
2. Communicate with department about disposition of grant
3. Is grant "ready" to be closed?
4. Communicate with department about disposition of grant
5. Is ROE needed?
6. Are Changes/Adjustments needed?
7. G&C Specialist verifies accuracy of Banner calculated and posted F&A and Tuition Remission
8. G&C Specialist email ROE to Departmental Grants Administrators for Review/Approval
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11. & 12. G&C Specialist prepares and submits Financial Status Report (FSR) to Sponsor (Funding Agency) in approved format and/or Final Invoice.
12. Resolve outstanding issues
13. G&C Specialist sets term date
14. Term Date

END

Orange = some variability in process: GS use different methods to determine set of closeouts due; GS use discretion to determine when ROE needs to be created and/or updated; GS may or may not use actual checklist; AD may set term date and some time may have passed since Trial Balance Summary was zeroed out

Green = represents a range of issues (e.g. AR, legal, etc.) 6/5/2012
Closeout Process Flow (New Process Under Development) – Federal awards with FSR Due in 90 days  [Key: Purple = GS report; Blue = Communication to Unit]

-90 to -60 Days

START

90 Day Termination Notice to Unit (Auto)

Closeout report to GS (-90, -60, etc.)

-60 to -30 Days

Check & correct F&A and tuition remission and coding

Perform early closeout tasks (-60 to -30 days)

Send personalized email to Unit (-60 to -30 days)

End Date (0)

Awards Ending?

Yes

No

Make note in DDARTA

Closeout report to GS (-90, -60, etc.)

-30 to 0 Days

Termination Notice to Unit (Auto)

Will BO Report be sufficient for Program and other multi-fund grants?

Yes

No

Sign-off from Unit?

Yes

No

File sign-off in grant folder

Send Final Notice of Figures to be submitted

Review status of award

Send balance & after-term expenditure report & other outstanding issues to Unit

Send personalized email to Unit (-60 to -30 days)

0 to +30 Days

Note in DDARTA whether sign-off is received from Unit

Set Term Date

+30 to +45 Days

Submit FSR (or earlier if required)

+45 to +60 Days

+60 to +90 Days

Closeout report to GS (-90, -60, etc.)

Closeout report to GS (-90, -60, etc.)

Closeout report to GS (-90, -60, etc.)

Closeout report to GS (-90, -60, etc.)

Closeout report to GS (-90, -60, etc.)

Closeout report to GS (-90, -60, etc.)

END
UIC Grants – Payments/Receivable

**SPONSORS**

START ➔ SEND IN GRANT PAYMENT

**UIS LOCKBOX**

SEND IN GRANT PAYMENT ➔ CHECKS AND RELATED DOCUMENTS ARE SUBMITTED TO A LOCK BOX AT UIS

Note: Risk of lost documents and a manual workflow

Note: Paper is being stored, could become a storage issue and result in lost documents

**GRANTS**

CHECKS AND DOCUMENTS GET DELIVERED TO GRANTS DAILY VIA FEDEX ➔ STORES COPY OF CHECKS, RECEIPTS AND STATEMENTS IN DAILY BATCH FOLDER

**Banner**

G&C RECORD THE GRANT CODE AND POST PAYMENT IN BANNER ➔ END

Note: Manual entry
BILLING STATEMENTS ARE AUTOMATICALLY GENERATED

NOTE: Most statements are automatically generated by Banner, but some are manually created in Excel by GCO

BILLING STATEMENTS ARE MANUALLY GENERATED BY GRANTS

4 COPIES OF EACH BILLING STATEMENT GET PRINTED OUT

Note: A lot of paper is created 4 copies of at least 150 statements

4 COPIES OF EACH BILLING STATEMENT GET PRINTED OUT

Note: Very few sponsors are set up to receive e-bills

2 COPIES GO TO THE SPONSORS/AGENTICIES VIA US MAIL

2 COPIES ARE STORED IN A GRANTS FILE FOLDER

Note: a lot of paper and physical storage

2 COPIES ARE STORED IN A GRANTS FILE FOLDER

END
Grants quarterly reports are due to Sponsors.

Finance reports are generated from Banner and EDW.

Finance reports are then saved in PDF format.

All the reports get printed out.

50% of the reports are electronically submitted to sponsors.

50% of the reports are mailed to sponsors who do not accept electronic reports.

A paper copy of every report is saved in the grants physical folder.

A lot of paper is generated and potential storage issue.
Month End Closing

Retrieve Billing list
Receive Banner Bill

Check DDARTA/ Award Set-Ups for Award Amendment

Does Subaward have automatic carryover?

Yes

Cancel billing event
Review bill and Mail

No

Review status
Subawards recently amended

Yes

Check DDARTA Historical Billing Notes

No

Review list for special features: automatic carryover, etc.

Subawards ending in 30-90 days

Subawards ending in current period or prior

Amendment received

Yes

Continue Banner billing

No

Review list for special features: automatic carryover, etc.

Continue Banner billing

Cancel billing event

Review bill

Does Subaward have automatic carryover?

Yes

Cancel billing event

Review bill

Prepare ROE, Follow up with Department to confirm costs applicable to budget period

Prepare final manual bill for budget period

Send Department via DDARTA for restricted balance in case they want to request carryover approval Document in DDARTA

Yes

Stamp bill “Not Final” and Mail

Prepare ROE, Follow up with Department to confirm costs applicable to budget period

Prepare FMB before deadline

Restrict balance, per ROE, if applicable

Do not mail/prepare catch-up manual bill

No

Continue Banner billing

Record needed actions in DDARTA for setup/ Amend as needed

End point:
DDARTA-Internal Assignment Tracking System
ROE-Report of Expenditures
UIeRA-Proposal & Award Tracking System

Start point:
CUMB-Catch-up Manual Bill

Decision:
Predefined Established Process
Manual Process
Document
**UIC GRANTS - Manual Billing Process**

1. **Amendment Received**
   - Review DDARTA for recorded actions needed at setup if/when amendment received.

2. **Banner billing cycle broken?**
   - Yes, FMB was created:
     - Send request to reinstate Banner Billing Event to UIC/UIUC Liaison.
     - Use Banner Bill received from UIUC to Prepare CUMB.
     - Record Bill amount in DDARTA.
   - Yes, but no FMB was created:
     - Continue Banner billing.
   - No amendment received before billing event was canceled/FMB not required:
     - Continue Banner billing.

3. **Restart CR**
   - Continue Banner billing.
GRANT AND CONTRACT TRANSACTIONS
Urbana Campus
ACCOUNTING AND REPORTING

ACCOUNTING FOR EXPENDITURES

Banner Grant and Fund Establishment

Upon assurance by the department that a project will be funded, a Grant Fund may be established in anticipation of an award (Request to Establish an Anticipation Grant/Fund). Attributes are input for maximum at-risk amount acceptable to the department and expiration date not to exceed 90 days. If approved, departments spend on anticipation funds at their own risk. Anticipation funds may be renewed at the conclusion of the initial 90 day period based on due consideration.

Expenditure Processing

Grant and contract expenditures are processed through University channels the same as other expenditures.

Vouchers, payroll, etc., are charged to appropriate grant or contract funds. Departments are responsible for proper C-FOAPAL coding.

Special considerations / procedures:
- Some expenditures are specifically approved by GCO before being made or input (e.g., non-feeder JV's, subrecipient / consultant payments, equipment purchases under varying sponsor criteria)
- Banner and iBuy approval queues are used to facilitate GCO review of qualified non-labor charges prior to posting, including cost transfers
- Procedures are in development for performing post-transaction review of labor redistribution charges on sponsored project funds

After award execution, the appropriate Specialist or Coordinator receives the award. Award assignments are based on sponsor.

Specialist or Coordinator: (FZAGRTN, FZMFUND)
- Prepare a Grant Create Sheet for use in setting up the Banner Grant and Fund Codes
- Enter necessary Grant and Fund attributes and budgets into Banner
- Set up any necessary LOC information
- Assign Banner F&A codes to Funds according to rates cited in the award document (FZMRFND)
- File award for reference among other award files for which the Specialist or Coordinator has responsibility
- Set up cost sharing / effort commitment information in either Banner or the Cost Sharing Web Application

When a Grant Code is attached to a Fund Code, transactions will simultaneously post to operating, grant, encumbrance, and general ledgers, as applicable. The grant ledger records transactions on a grant year and ITD basis.

After Banner funds are established, GCO notifies the Unit / PI so charges may be processed. A notification form is sent to the unit with necessary information. In the past the form has varied among sections and is currently being standardized and automated.

GCO Information Management staff prepare daily reports, posted to the GCO network, which include exception information designed to detect errors in grant / fund setup. Specialists and Coordinators are responsible for accessing the exception reports and addressing any errors detected on awards assigned to them.

PLs and departments are responsible for the appropriateness and accuracy of charges to sponsored projects.

Standard statements of monthly financial activity on sponsored project funds are generated monthly by UAIFR. Campus departments are responsible for accessing these statements from ViewDirect or EDDIE or otherwise self-generating reports in order to monitor financial activity for sponsored projects. Standard reports detail expenditures and obligations, including payroll, processed against the project.

Banner also allows real-time review of transactions and grant/fund balances ITD. (FZIGITD, FZIGTRD)
GRANT AND CONTRACT TRANSACTIONS
Urbana Campus
ACCOUNTING AND REPORTING

Funds are obtained from sponsors by various means. Some awards from Federal Agencies operate under LOC procedures. Others use advances as agreed upon in the awards. Cost reimbursement contracts are billed based on project expenditures.

**BILLING**

- **Letter of Credit (LOC)**
  - Institutional (NIH, NSF)
  - Project by Project

Expenditures are posted to Banner funds throughout the month. Posting to OL, GL and grant ledger is simultaneous. LOC draws are based on amount of expenditures posted to the project (up to the award amount).

**Cost Reimbursement Awards**

- Estimated revenues posted automatically based on expenditure activity. Billing event creates an actual sales invoice which is sent to sponsors.

**Fixed Price / Scheduled Payments**

- Automatic Advances

- Based on payment schedule in award agreement; Sponsors automatically send agreed upon amount at predesignated dates.

- **Requested Advances (RARE)**

  - Look at cash position for a project and estimate the amount that will be expended during next billing period (month, quarter).
  - Bill is manually prepared in advance of spending.

---

**Weekly:**
- Calculate drawdowns for each line of credit for all projects sponsored by a given agency
- Drawdowns are based on actual spending, adjusted for A/P, overdrafts, and estimated 3 days’ cash needs
- Funds are sent to the campus bank account (EFT). Cash is posted to the applicable LOC pool fund in Banner until applied directly to a specific grant billing by GCO

**At least monthly:**
- Drawdown calculation according to award terms, based on actual expenditures (cost reimbursement basis)
- Requests to sponsors with multiple awards typically include how much is drawn for each project
- Funds are sent to the campus bank account (EFT), cash is posted directly to the project

**Quarterly (or at other agency-required intervals):**
- Generate a report of allowable expenditures for all projects under Agencies’ respective LOC
- Prepare quarterly cash position reports (FCTR) to Agencies
- GCO’s Information Management staff have developed system reports to facilitate this sponsor reporting
- Reports may be submitted electronically or on paper, based on sponsor preference

---

**Use Evisions (Banner’s billing application) to create bills. Banner OL, GL, and grant ledger posting is automatic with bill generation.**

On a quarterly basis, reconcile A/R subledger to the GL. This occurs as a part of UA FR’s quarterly A/R reporting to the State.

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To: Collections Procedures
GRANT AND CONTRACT TRANSACTIONS
Urbana Campus
ACCOUNTING AND REPORTING

From: Billing Procedures

COLLECTIONS

Collections for University projects can be received in a number of ways (in addition to LOC).

EFT directly to Bank (LOC and Non-LOC)

All federal agencies, most private sponsors pay by EFT.
GCO accesses a list of EFT deposits to the Campus' bank, _______.

- Specialist enters deposits into Banner and applies to appropriate invoice (FIFO).
- Different A/R detail codes are used for ACH and wire transfer to aid UAFR in bank statement reconciliation.
- UAFR sends GCO information on reconciliation variances that may necessitate GCO action (deposit application, invoice creation, etc.)
- Unidentified deposits are posted to a holding fund in Banner.
(FZAAREV)

Lockbox

When collections for grants or contracts are received, hold the check. Prepare a "tracer" form. Send tracer form, copy of check, and any supporting documents (often none received) to GCO.

Received at Grants & Contracts

For any checks received at the GCO Office, a GCO Specialist or Coordinator determines the projects which should be credited and fills out the Report of Money Received.
Report of Money Received and check are forwarded to USFS/CO for deposit and Banner A/R application.

Use the AllMoney application (an Access database) to download transaction data (amount, payor, transaction detail, etc.) from the bank's lockbox service (______).

GCO determines project to be credited.
Prepares a Report of Money Received.
Sends information to Cashiering to post and deposit.

Applicable to Cost Reimbursement

Applicable to Automatic Advances

Applicable to Scheduled Payments

When automatic advance funds are received, GCO Specialists or Coordinators create an invoice on the appropriate project for amount received.
Cash receipts are posted using detail codes appropriate for the transaction (manner of receipt, campus).
The GL and grant ledger are simultaneously updated.

COLLECTION EFFORTS ON PAST DUE BALANCES
CLOSEOUT

Differing requirements and procedures are necessary for the different types of grants or contracts, the requirements of the award, and the sponsors that may be involved.

Notice of Terminating Agreement(s) is electronically sent to units 90 days prior to Banner end date. The Notice requests information relative to award closeout.
- Information Requested:
  - Will project be completed as of termination date?
  - Will project continue with additional funds?
  - Will project continue under a new award number?
  - Will project be incomplete and need a NCE?

Specialists and Coordinators:
- Review expenditures for appropriateness
- Verify indirect costs (ensure rate and calculations are correct)
- Prepare final billings to the Sponsor or, if required, prepare final FSR
- Cost Sharing Report (if applicable)
- Reconcile payments to Banner

Closeout staff prepare (as needed):
- Releases
- Assignment of Refunds, Rebates, and Credits
- Final Government Property Report
- Reports of Patents/Inventions/Copyright - coordinate with OTM (HHS patent reporting is an electronic process coordinated by section staff)

When all grant funds have been expended, billed, and received (i.e., expenditures, invoices and payments all reconcile) and fund GL balances for accounts below 70000 are all zero, termination and end dates are entered on the grant, fund and index codes in Banner to indicate closeout and inactivate the fund. (FGTBSR)

Fixed price awards with residual cash balances are closed according to University Policy.

Record retention and subsequent purge occurs a minimum of three years (or more if project T&C dictate) following the final closeout date.

Closeout for fixed price awards with residual cash balances:
- Residual balance expended for research purposes until March of FY following end date, including NCE
- Balances >25% of total award must be justified
- Residual cash balances are frozen in March of FY following end date (reminders sent to PIs in the preceding January)
- Following the freeze and during close-out, GCO assesses F&A on the unexpended balance
- Residual balance is transferred to a unit fixed price allowance account established for this purpose in the institutional allowance account range.

Project closeout may be delayed for a variety of reasons including, but not limited to, reporting and collection of funds. Closeout staff generate a monthly report of awards past the Banner end date but not yet closed out. Within the report, data is parsed by section staff responsible.

Specialists and Coordinators are responsible for following through on open items for awards ending in the previous fiscal year to facilitate final closeout. Closeout staff pursue necessary actions to facilitate closeout on older awards.
**GRANT AND CONTRACT TRANSACTIONS**

**Urbana Campus**

**BANNER SUPPORT AND INFORMATION MANAGEMENT**

---

**INFORMATION MANAGEMENT AND REPORTING**

**Purpose:** support operational and reporting needs (e.g., error detection, quality control) as well as requests for information.

**Activities:**
- Generate regular error and information reports (daily, weekly, monthly, quarterly, annually)
- Write ad hoc reports to pull data to meet various needs by various users

**Uses include but are not limited to:**
- Error Detection
- Quality Control
- Verification of cash collected, posted
- LOC balancing
- University reporting
- A-133

**Users include but are not limited to:**
- GCO Management and Staff
- Campus Administration
- Campus Units
- University Administration
- Other parties external to the University

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**BANNER SUPPORT & INFORMATION MANAGEMENT**

**GCO has responsibility for:**
- Banner testing for the University.
- Other support activities include:
  - Banner system monitoring (University) and information management (GCO).

---

**BANNER TESTING**

**GCO has University-wide responsibility for:**
- Testing Banner upgrades and patches prior to installation
- Participant in the year-end processing team
- Participant in Sungard user groups
- Participant in internal University system-enhancement groups

---

**BILLING SUPPORT**

**Billing support is centrally provided within GCO for awards (LOC and non-LOC sponsors).**

**Sequence (Non-LOC):**
- 1st day of month: Banner Support staff generate an initial audit run for review by Specialists and Coordinators (see Billing process description). Staff will usually review non-LOC awards more intensively at the audit run stage. No Banner posting at this stage.
- 3rd day of month: Banner process is run to create bills.

**Ad Hoc:** Assistance provided by Banner Support staff
- Interim billing events
- Reconciliation, billing issues
- Cash applications

---

**SYSTEM OUT OF BALANCE**

**On a daily basis, GCO monitors for any system out-of-balance issues / errors within Banner (Grant Ledger). GCO alerts appropriate parties (UAFR, Sungard, etc) and assists in resolution.**
GRANT AND CONTRACT TRANSACTIONS
Urbana Campus
MONITORING AND REPORTING

MONITORING ACTIVITY AND REPORTING TO SPONSORS

Throughout the award period, award-specific monitoring and reporting is performed by campus units and by GCO Specialists and Coordinators.

GCO RESPONSIBILITIES

GCO specifically monitors some foreign travel and equipment purchases prior to submitting charges for reimbursement to sponsors. (Depends on sponsor requirements.) See Expenditure Processing in the Accounting for Expenditures diagram.

Changes, Approvals, Interaction with Sponsors:
Some events or expenditures require sponsor approval prior to incurrence (e.g., change in PI, change in SOW, or certain purchases of equipment or capital assets). All such requests are submitted through GCO to facilitate sponsor approval.

Some Federal Agencies have given institutions EA to reduce the Agencies' administrative duties in accordance with FDP. Varies by Agency. Some examples:
- Approve pre-award costs (< 90 days)
- Approve foreign travel
- Approve NCE
- Approve equipment purchases

Since sponsors typically allow latitude in rebudgeting GCO does not monitor spending according to original award budget categories.

Information Management staff routinely prepare exception reports for use in monitoring and based on a variety of criteria. Reports are generated daily / weekly / monthly and saved to a GCO shared drive. See Banner Support and Information Management for further Information Management information.

Specialists and Coordinators are responsible for accessing reports applicable to their award assignments and appropriately addressing any noted issues in a timely manner.

GCO sends additional reports to departments to help with project financial oversight (sent to GRDC for each fund). Reports are sent electronically and include:
- Accounts in overdraft status
- Notice of Terminating Accounts (See Closeout)

Certain project expenditures are reviewed quarterly for consistency with approved budgets and appropriateness to the project. (See Central Monitoring and Compliance diagram, including other related central activities.)

To: Central Monitoring and Compliance

CAMPUSS UNIT RESPONSIBILITIES

University policy specifically places responsibility for day-to-day project monitoring and compliance with campus departments.

See Accounting for Expenditures diagram for further description.

Semiannual Expenditure Confirmation process requires annual certification by PI's of the reasonableness of payroll charges to their projects, including cost sharing.

See Central Monitoring and Compliance diagram for monitoring procedures.

ARS provides information about cost sharing contributed to sponsored projects. After-the-fact confirmation of activities allocable as cost sharing for each sponsored agreement is the responsibility of PI's and campus units. ARS enables ongoing monitoring and facilitates annual after-the-fact confirmation.

Note: Combined, the Semiannual Expenditure Confirmation process and the ARS after-the-fact confirmation process comprise the campus Effort Reporting system.

Project Technical Reports are the responsibility of the PI. Campus units have responsibility for monitoring and assistance in fulfilling requirements.

GCO RESPONSIBILITIES

Procedures have been established to monitor compliance with (a) financial reporting requirements, (b) use of funds and other project T&Cs, and (c) timely billing according to award T&Cs.

REPORTING

Sponsors have various requirements for the nature, frequency, and content of reports (financial and project progress).

Banner fund and grant codes are set up consistent with project / budget periods of individual awards.

To varying degrees, Specialists and Coordinators use Banner Event Dates or Outlook tasks to trigger project-specific reporting, billing, and other event dates.

Financial reporting frequency is typically annual, sometimes quarterly or semiannually. Reporting requirements sometimes coincide with billing events. Billing frequency also varies but is typically monthly.

Specialist / Coordinator Process:
- Financial reporting requirements reviewed and noted with initial award establishment
- Budgets set up in Banner based on sponsor-approved project proposal
- Project and budget periods are entered in Banner as a Grant attribute
- Banner event dates or other manual systems are used to trigger billing dates
- Upon event trigger, financial reporting or billing requirement is facilitated by GCO

In preparation for closeout, Specialists and Coordinators compile information and prepare reports, including FSR's, to the various sponsors. See Closeout diagram.
GRANT AND CONTRACT TRANSACTIONS
Urbana Campus
CENTRAL MONITORING AND COMPLIANCE ACTIVITIES

CENTRAL MONITORING AND COMPLIANCE ACTIVITIES (NON-PROJECT-SPECIFIC)

SUBRECIPIENT MONITORING

Section staff:
GCO initially receives subrecipient invoices and verifies appropriate CFOP coding and then routes to the department for PI review and approval. After departments send to UPAY, GCO approves the invoices via Banner queues prior to payment. Compliance staff may assist in this.

Compliance staff:
Verify subrecipients have undergone required audits (current A-133 audits must be on file), and working to resolve any subrecipient audit issues.

A-133 & EXTERNAL AUDIT LIASON

In all cases of financial audits or reviews of sponsored projects, GCO is the official liaison between the auditors and any University unit. For technical reviews, GCO is aware but does not function as coordinator.

A-133 audit is coordinated through GCO who notify unit Business Managers when a project in their unit is selected for audit. GCO facilitates cooperation among the A-133 audit firm, GCO and units for fulfillment of audit requests.

Sponsors occasionally request a program specific audit. GCO also coordinates these activities, including the participation of the unit and PI.

PERIODIC EXPENDITURE TESTING

GCO periodically post-audits certain categories of expenditures on federal projects for allowability under A-21. Targeted for quarterly frequency, GCO reviews transactions charging any Banner account designated as potentially unallowable or restricted under A-21 to a federal project (including projects funded with “pass through” federal funds).

100% review is performed of transactions meeting unallowable or restricted criteria. Unjustifiable transactions are transferred to appropriate departmental funds.

GCO is in the process of implementing procedures for periodic post-audit of labor redistribution transactions.

EFFORT REPORTING

Semiannual Expenditure Confirmations:
For the 6-month periods ending December and June, GCO generates an after-the-fact confirmation for each PI to sign. The form includes all direct charges (salary, wages and other) and cost sharing effort for each sponsored project. By signing the semi-annual confirmation, the PI’s confirm, among other things, salaries and wages charged to the project reasonably reflect actual effort.

ARS: ARS labor distribution data is a piece of the campus effort reporting system. GCO activities with regard to ARS data are described in under Cost Sharing responsibilities.

COST SHARING

Specialists and Coordinators record cost sharing commitments in the University’s web-based Cost Share application for new sponsored projects or amendments to existing sponsored projects with identified cost-sharing commitments.

GCO compares cost sharing commitment of PIs with their appointment and effort reports via ARS. If a PI’s effort report shows less cost sharing than has been committed, GCO, with the assistance of the unit, either corrects the effort report or negotiates a reduction of the cost sharing effort with the sponsor(s).

UNIVERSITY-WIDE COMPLIANCE

Semiannual: Gather data for small business reporting.

Various state and federal agencies require general reports that GCO prepares or facilitates (e.g., GAAP, IDHS, etc.).
A/P  Accounts Payable
A/R  Accounts Receivable
ARS  Activity Reporting System
BFPP  Business and Financial Policies and Procedures
C-FOAPAL  Banner coding string: Chart-Fund-Organization-Account-Program-Activity-Location
DCAA  Defense Contract Audit Agency
DOE  United States Department of Energy
EA  Expanded Authority
EDDIE  Enterprise Data Delivery Information Environment
     (tool for retrieval and review of standard reports)
EFT  Electronic Funds Transfer (term inclusive of ACH and wire transfer receipts)
FDP  Federal Demonstration Partnership
FCTR  Federal Cash Transaction Report
FIFO  First-In-First-Out
FSR  Financial Status Report
FWS  Federal Work Study
GCO  Grants and Contracts Post Award
GL  General Ledger (Banner balance sheet accounts)
GRDC  Grant Report Distribution Contact
HHS  United States Department of Health and Human Services
I/C  Indirect Cost
ICR  Indirect Cost Rate
ITD  Inception-To-Date
LOC  Line of Credit
MTDC  Modified Total Direct Costs
NASA  National Aeronautics and Space Administration
NCE  No Cost Extension
NIH  National Institutes of Health
NSF  National Science Foundation
OBFS  Office of Business and Financial Services
OL  Operating Ledger (Banner income and expense accounts)
OMB  United States Office of Management and Budget
ONR  Office of Naval Research
OSPRA  Office of Sponsored Programs and Research Administration
OTM  Office of Technology Management
PI  Principal Investigator
PTF  Proposal Transmittal Form
SOW  Statement of Work (or Scope of Work)
T&C  Terms and Conditions
UAFR  University Accounting and Financial Reporting
UleRA  Electronic Research Administration tool
UPAY  University Payables
USFSCO  University Student Financial Services and Cashier Operations
VCR  Vice Chancellor for Research
Appendix E
Proposal Approval Form
To avoid delays in processing, please be sure to type and complete all applicable information

I. General Information

Sponsor Deadline (mm/dd/yy): Sponsor Time Deadline (CST): Date of: Postmark Receipt
Electronic Submission: Yes No If yes, Please Select, if other please specify:
Have/will you use UIC CCTS services on this proposal? Yes No
Do any investigators on this proposal have a joint appointment with the Jesse Brown VA Medical Center? Yes No
If yes, and submitting to NIH, complete and attach the Supplemental Joint UIC/VA Appointment Form.

II. UIC Project Contact (business manager, program coordinator)

Name: Email: Phone: Mail Code:

III. Administering Unit (Complete ONLY if different from the PI's home unit)

Administering Unit Name: Org. Code:
Contact Name: Email: Phone:

IV. Principal Investigator

1. Name: UIN Number: Home Unit Name and Organization Code:
Email: Phone: Fax:
Investigators (For multiple Principal Investigators, please check PI box. For additional Investigators, click here)

<table>
<thead>
<tr>
<th>Name</th>
<th>UIN Number</th>
<th>Home Unit Name and Organizational Code</th>
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V. Project Title (If this project is a Task Order/Protocol related to a Master Agreement, provide PAF#)

VI. Sponsor Information – Indicate the name of the organization which will directly provide funding to UIC (No acronyms or abbreviations)

Full Name of Sponsoring Organization:
Street Mailing Address Suite/Room (No PO Box):
City: State: Zip: Sponsor Contact Name:
Country: Email:
Phone: Fax:
Is Sponsor a federal agency? Yes No
If Yes, please provide CFDA Program Name and Number:
If No, is "Sponsor's" originating source of funds from a federal agency (federal flow-through)? No Yes
If yes, specify federal agency name: and CFDA Program Number:
VII. Project Information – Select ONLY one item in EACH section

- **Type of Proposal:**
  - Please Select
  - *Previous PAF/Institutional number: _______
  - **Limited Submission:** ☐ Yes ☐ No
  - If Yes, attach a copy of authorization received from RDS

- **Type of Award:**
  - Please Select

- **Type of Activity:**
  - Research*
  - Instruction
  - Public Service
  - Select only one

* Any inventions resulting from the research covered by this project must be disclosed to the Office of Technology Management (OTM)

VIII. Budget

- **Year one or current year (mm/dd/yy format):**
  - From: _______ To: _______
  - **Total Project Period (mm/dd/yy format):**
  - From: _______ To: _______

- **Budget**
  - Year 1 or Current Year
  - Total for Entire Project
  - Direct Cost $ _______ $
  - Facilities & Admin. (ICR) $ _______ % $ _______ %
  - Total Request $ _______ $

  *Is the F&A rate used other than UIC Federally Negotiated Rates? ☐ Yes ☐ No
  - If Yes, complete a F&A Waiver Form and provide sponsor documentation supporting reduced rate

IX. Cost Sharing – All cost sharing committed in the proposal must be documented. Committed cost-sharing is tracked in the accordance with OMB Circular A-21. Please answer ALL questions 1-4 below.

1. Is Cost Sharing included in this application? ☐ Yes ☐ No
   - a. If yes, required by sponsor? ☐ Yes (Mandatory Committed) ☐ No (Voluntarily Committed)
2. Are there any individuals named in this application contributing effort which is not reimbursed by sponsor? ☐ Yes ☐ No
3. Have you proposed Cost Sharing other than Academic Contributed Effort? ☐ Yes ☐ No
4. Is there a agency salary cap? ☐ Yes ☐ No
   - a. If yes, is there an individual on the budget whose salary is above the salary cap? ☐ Yes ☐ No

X. Distribution of College and Department F&A Allocation (College/Unit Name required. Code # optional)

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<th>College/Unit Name</th>
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100% (Total must equal 100%)

XI. Compliance

This project uses or involves:

- **Human subjects or tissues** ☐ Yes ☐ No
  - Pending (For all New and Competitive Renewal Applications)
  - IRB #:
- **Animals** ☐ Yes ☐ No
  - Pending (For all New and Competitive Renewal Applications)
  - ACC #: ______
- **Recombinant DNA or Infectious Agents/Toxins** ☐ Yes ☐ No
  - Institutional Biosafety Committee Protocol No. ______
- **Human Embryonic Stem Cells** ☐ Yes ☐ No
  - Institutional Biosafety Committee Protocol No. ______
- **UIC hospital, clinics or MRI center** ☐ Yes ☐ No
  - Hospital/Clinic/MRI Center Approval:
    - Signature ____________________ Date ________________

Clearance required:

- □ Pending (For all New and Competitive Renewal Applications)
- □ IRB #:
- □ ACC #: ______
- Institutional Biosafety Committee Protocol No. ______
- Hospital/Clinic/MRI Center Approval:
  - Signature ____________________ Date ________________
# XII. Conflict of Interest Certification

All Investigators regardless of the funding source and senior/key research personnel on HHS/PHS/NIH sponsored research must complete this section. In accordance with the University Policy on Conflict of Commitment and Interest, significant financial interests (SFIs) must be disclosed to the COI Office at the proposal stage and within 30 days of any newly acquired or discovered SFIs or changes in the reported SFIs on awarded grants. If an Investigator or key research personnel responds “Yes” to the question below, then you must contact the Conflict of Interest Office at COI@uic.edu or (312/996-4070) to complete additional forms for disclosure and management. For additional resources, see FAQs and Guidelines on the disclosure and management of Significant Financial Interests.

1. At present or in the 12 months prior to this disclosure, do you or your family members have a significant financial interest (SFI) with the research sponsor or any subcontract recipient? Or have any other relationships or sponsored or reimbursed travel that may present a potential Financial Conflict of Interest with this research?

For completion by all Investigators

<table>
<thead>
<tr>
<th>Name</th>
<th>Yes</th>
<th>No</th>
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For completion by all HHS/PHS/NIH Senior/Key Research Personnel:

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<td>Key Personnel Name</td>
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# XIII. Proposal Approval

## A. Investigator(s)

The Investigator(s) certifies the following: (1) that the information submitted within the application is true, complete and accurate to the best of their knowledge; (2) that any false, fictitious, or fraudulent statements or claims may subject the Investigator(s) to criminal, civil, or administrative penalties; (3) agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application; (4) that you are not currently debarred, suspended or ineligible to receive federal or non-federal funds; (5) that, as required by the University, you are current in your financial conflict of interest training, disclosures of sponsored or reimbursed travel and disclosures of known significant financial interests (and those of spouse or domestic partner, parents, siblings and children) that might reasonably be related to your University responsibilities; and (6) when required under sponsor regulation. The PI further certifies that all Senior/Key Personnel including subrecipient(s) proposed under this submission are current in such disclosures of known significant financial interests.

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<th>PI/Co-Inv. Name</th>
<th>Signature</th>
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## B. Department/Unit Head(s)

The Department Chair/Unit Head has reviewed and approved the project and any resource commitments, and certifies that the research can be conducted safely and in compliance with federal and state laws. If the Principal Investigator is the department or unit head, the individual the PI reports to must sign.

Name: Signature: Date:

Name: Signature: Date:

Name: Signature: Date:

## C. Schools or College Dean(s), except for College of Medicine, College of Engineering, and School of Public Health

Name: Signature: Date:

Name: Signature: Date:

Name: Signature: Date:
Appendix F
Proposal Transmittal Form
ILLINOIS
UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN

Published or Mandated Sponsor Deadline
postmarked by ________
receipt by ________
electronic submission due Specify Time Zone
Verification of published deadline should be made available with guidelines

Has preliminary review occurred?  Yes □ No □
(Preliminary review service is only available prior to stated internal deadlines.)
If yes, indicate OSPRA Coordinator Name ________
UleeRA Number Assigned ________
NetFiles name ________

IDENTIFICATIONS:

Principal Investigator Name: ________
(ATTACH LIST IF MORE SPACE IS NEEDED)
Last First Initial UIN Initiating Dept/Division Name E-mail Address Phone Number
Co-principal Investigator(s):

Proposal Title: ________
Sponsor/Agency Name: ________
(If an incoming subaward, specify the name of originating sponsor in parentheses after the Prime Recipient's name, e.g. University X (NSF))
Sponsor/Agency Mailing Address: ________
(Include street address if express mail is to be used)
Agency RFP#, BAA#, RFQ#, Program Announcement # ________ [Complete Guidelines MUST be attached or URL provided.]
Begin date: ________ End date: ________

Supports a program of: (check one) □ Basic Research □ Instruction □ Public Service □ Applied Research □ Product Development □ Technical Testing □ Other (specify) ________
Proposal Type: (check one) □ New □ Renewal □ Continuation □ Revised Proposal or Budget □ Supplement

Send Agreement with Proposal: □ Yes □ No
If Yes: □ Draft □ Sponsor Specific For renewal or continuation, provide previous UleiRA # __________, sponsor grant/contract # __________, and current Grant Code __________

PRINCIPAL INVESTIGATOR RESPONSIBILITY: It is understood that if an award results from this application, the principal investigator will perform the administrative duties normally associated with the project. The principal investigator assures that he/she makes this submission with the understanding that any resulting award will contain no provision restricting the University’s right to publish research results, and that if any question of such restriction arises in subsequent negotiation he/she will assist in arranging the further review that will be required.

NOTE TO PRINCIPAl/co-principal INVESTIGATOR(S): By signing this transmittal form, you are certifying that 1) the information submitted herein is true, complete and accurate to the best of your knowledge, 2) any false, fictitious, or fraudulent statements or claims may subject you to criminal, civil or administrative penalties, 3) you agree to accept responsibility for the scientific conduct of the project and to provide progress reports, 4) you are current in your disclosures of known significant financial interests (and those of spouse or domestic partner, parents, siblings and dependent children) that might reasonably appear to be affected by the research being proposed, and 5) when required under sponsor regulation, you further ensure that all personnel proposed under this submission are current in such disclosures of known significant financial interests.

(Attach additional pages for multiple signatures (i.e., PI/Co-PI and affected Colleges and Departments), if necessary)

Approved By:

Date Principal/Co-principal Investigator(s) or Initiator(s) Date Executive Officer(s) of Department(s)
of Proposal (Signature may not be delegated)

Date Dean or Director Date Other Signatures if Required

Office of Sponsored Programs and Research Administration Research Board Authorization
For information on this proposal call Name: ___________________ Phone: ___________________ E-mail: ___________________

SPECIAL MAILING INSTRUCTIONS: (Attach special instructions if needed)

Banner FOAP (Grants codes may not be used for shipping purposes) to charge for shipment: ________

Page 1 of 2
BUDGET INFORMATION:

<table>
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<tr>
<th>First Year Request</th>
<th>Total Request</th>
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<tr>
<td>Direct Costs</td>
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<tr>
<td>Facilities/Admin Costs</td>
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<tr>
<td>Total</td>
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</table>

* If proposal application is to a Non-Federal Sponsor, are federal funds involved? Yes [ ] No [ ]

COST SHARING:

If no cost-sharing is indicated leave this section blank and proceed to “Proposal Characteristics…”

Required by Sponsor?:
- [ ] Yes
- [ ] No
  - [ ] Informal Request of Sponsor
  - [ ] Voluntarily Committed

IN THE FORM OF CONTRIBUTED EFFORT* OF ACADEMIC EMPLOYEES:

Cost sharing is normally shown as a percentage of PI and/or Co-PI(s) time paid by non-sponsor funds. Attach additional page if necessary:

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<th>% of Time</th>
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</table>

*Cost sharing of any effort must be reported in the Activity Effort Plan and will be confirmed in the Semi-Annual Confirmation of Expenditures on Sponsored Projects.

COST SHARING OTHER THAN ACADEMIC CONTRIBUTED EFFORT:

| $____ from Campus/Central Administration | $____ from College |
| $____ from Department                     | $____ from other campus sources, including Research Board (specify) |
| $____ from off-campus sources (specify)  |

FOR INTERNAL PURPOSES AT TIME OF PROPOSAL SUBMISSION: In an attachment, identify the party providing cost-sharing and provide a detailed description of the items of cost (breakdown of equipment, travel, material and supplies) to allow for determination of allowability. This information is required upon award.

PROPOSAL CHARACTERISTICS, COMPLIANCE, AND OTHER APPROvals: (check all that apply). Work performed under this proposal involves* the following:

- [ ] Use of human subjects or HHS Exemption # [ ]
- [ ] Corrosive gases
- [ ] Subaward: If yes, should include Scope of Work, Budget and Authorized Administrative Approval, and a Letter of Support w/ appropriate authorizing signature
- [ ] Use of live vertebrate animals[ ]
- [ ] Pyrophoric gases
- [ ] Consultant payment
- [ ] Human [ ] and/or Non-Human Primate materials [ ]
- [ ] Extremely toxic gases (Zone A or B)
- [ ] Use of Background Intellectual Property
- [ ] Stem Cells
  - [ ] Human
  - [ ] Animal
- [ ] Explosives
- [ ] Patent considerations
- [ ] Recombinant DNA:
  - Proposal page # [ ]
- [ ] Discharge of unusual pollutants in waste water
- [ ] Copyright issues
- [ ] Transgenic Animals [ ], Seeds [ ], Plants [ ]
- [ ] Requirement for Environmental Statement
- [ ] Use of proprietary or confidential information
- [ ] Biotoxins
- [ ] Other safety or health hazard
- [ ] International program*
- [ ] Dichlorobenzene
- [ ] Other
- [ ] Chicago Imprint
- [ ] Pathogens: Human [ ], Animal [ ]
- [ ] Small Business Subcontracting Plan
- [ ] EXPORT CONTROL: ITAR/EAR
- [ ] Chemical hazard
- [ ] Construction of Building
- [ ] Use of Foreign Nationals
- [ ] Biological hazard
- [ ] Limited Submission
- [ ] Covered Technology
- [ ] X-Ray or Laser Registration
- [ ] Multiple Principal Investigators (NIH only)
- [ ] BOTH OF THE ABOVE
- [ ] NONE OF THE ABOVE

(1), (2), (3), (4) and (5) See definitions and approval requirements on attached sheet.

(6) Submit lab animals care protocol form IACUC-1 to the Institutional Animal Care and Use Committee.
Definitions and Approval Requirements
for UIUC Transmittal Form

(Please separate this page from TRANSMITTAL FORM. Do not forward this page to OSPRA.)

(1) Title: There are enough spaces for 130 characters in the title. If you have extra space you may add any key words not already included in the title. Do not change the title of a project once the proposal has been submitted and an award has been received.

(2) Definitions:

Basic Research: Funds to support any original investigation for the advancement of scientific knowledge not having a specific commercial objective.

Applied Research: Funds to support investigations designed for practical or commercial objectives.

Product Development: Funds to support investigations to advance specific technological inventions or innovations.

Instruction: Funds for Instruction and Training activities separately budgeted and accounted for by the University in Grant Funds for enrolled Urbana-Champaign Campus students. Examples include summer institutes, special training programs for selected participants, the development and introduction of new or expanded courses (curriculum development), and similar instructionally-oriented undertakings.

(3) Proposal Types:

Continuation: Annual application (progress report) within a multiple year award, e.g. Year 2, 3, 4, or 5 of a NIH 5-year project.

Renewal: Beginning of a new award, which follows a previously awarded project under a different contract number.

Supplement: New funding for new work under an existing project. Period of performance is continuous or starts prior to the expiration of the existing project.

(4) Approval Requirements:

• All international programs and studies are to be approved by the Director of International Programs and Studies.

• Proposals for fellowships, training grants, or budgets that include a cost of education allowance are to be approved by the Graduate College.

• Proposals which will require facilities or staff of several colleges are to be approved by the dean of each college concerned.

• The signature of Provost is required for: commitment of campus or university funds, summer or academic year institutes, construction of a new building, development of a new research or public service program which would require IBHE approval, and staff or facilities of more than one campus.

• The signature of Vice President for Academic Affairs is required for: commitment of university funds, construction of a new building, development of a new research or public service program which would require IBHE approval, and staff or facilities of more than one campus.

(5) Compliance (Please mark all affected areas of compliance):

The department/unit is responsible for compliance issues such as (but not limited to): use of human subjects or lab animals, chemical hazards, biological hazards, patent considerations, consultant payments, potential conflicts of interest, copyright issues, export control, etc.

(6) Send Agreement with Proposal:

Indicate whether an agreement should be sent at the time of proposal submission. If so, indicate the type of agreement:

1. Draft – A template of a standard University agreement that has not been filled in but is provided solely for the purpose of sponsor review in making a decision to fund.

2. Sponsor Specific – An agreement that has been completed and ready for review and signatures. Please be advised that additional time is required when a completed sponsor-specific agreement is to be included with the proposal submission. Typically a funding decision has already been made.

(7) Space: If renovation or additional space is needed, arrangements to meet this need have been made with the Office of Facility Management and Scheduling and are described on an attachment for internal use.
HHS FCOI Requirements

To: All Investigators submitting Proposals to PHS funding sources (NIH, CDC, FDA, other agencies) as well as sponsors who have adopted the HHS regulations

Effective August 24, 2012, HHS mandates prompt and detailed financial disclosure for Public Health Service (PHS)-funded investigators. An “Investigator” is defined as the project director or principal investigator and any other person, regardless of title or position who is responsible for the design, conduct, or reporting of research funded by the NIH, or proposed for such funding. This includes PIs, co-PIs, postdocs, research scientists, research assistants, and potentially others who play a key role, such as emeritus faculty members or research fellows paid on other sources of funds.

Your action is needed regarding

• updated financial disclosures of significant financial interests (SFI) for all Investigators under your proposal, and
• training for your research group on both the new regulation and our University policy

See below.

Disclosure Update: When submitting a new proposal or renewing an existing PHS grant, you will be asked to certify that you (and all Investigators on the proposal) are up-to-date on all disclosures of significant financial interests (SFI) related to your University responsibilities. Investigators may update in advance using the form at http://www.research.illinois.edu/coi/PIFID_2012.pdf. Once the form is complete, please print, sign, scan, and return by email to phsdisclosure@illinois.edu or forward hard copy to Melanie Loots in the Office of the Vice Chancellor for Research, 419 Swanlund, MC-304, for review. SFI include

• Greater than $5000 remuneration by or equity interest in an external entity (e.g., consulting or other payments, stock, stock options)
• Any payment from or equity interest in a non-publicly traded company
• Any externally reimbursed or sponsored travel (academic and government sponsors are exempted, but not non-profit organizations).

For more information, see definitions and FAQ at http://www.research.illinois.edu/coi/PHS_Disclosure_Regulations.asp.

Training

Anyone in your research group with responsibility for the design, conduct and analysis of PHS-funded research must undergo training every four years regarding the HHS regulations. Such training must also occur prior to initiating any activity under this proposal should it be awarded.

Training options are described at http://www.research.illinois.edu/coi/PHS_Training.asp. To arrange for a training session for your department or research group, please contact Melanie Loots by email at mloots@illinois.edu or at 333-0034.

If you have attended informational sessions or in-person training on the new HHS regulation, and completed a registration form, the OVCR has documentation on record. The University must document training for all current PHS investigators when new proposals are submitted and new awards, renewals and continuations are executed.

Subrecipients

If the proposal contemplates a subrecipient relationship with a third party, we will require a letter of support from that proposed subrecipient, signed by an authorizing agent for the entity, at the proposal submission stage. The letter shall include a certification that the subrecipient shall, at the time of award (1) have in place a conflict of interest policy that is compliant with the HHS regulations, or (2) agree to adopt and abide by the UIUC conflict of interest policy. We will not submit proposals for consideration to PHS programs unless we have such a letter on file.

Please contact Melanie Loots at mloots@illinois.edu or 217-333-0034 if you have questions.