




Princeton >
Research

Coffee with ORPA:

Tools in Your Toolbox for
Research Disclosures and Compliance



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Agenda

- Overview
- Conflict of Interest Process and System
- Current & Pending and Individual Portfolio Report (IPR)
- Additional Resources
- New Labor Accounting Alerts for RCR and e-Verify
- Quiz
- Q&A



Today's session will provide an overview of some of the tools at Princeton University to ensure compliance with federal guidance

Overview

Researcher Disclosures

- **Researchers disclose information externally in the below:**
 - Biosketch
 - Current & Pending / Other Support
 - Facilities & Other Resources
- **The disclosure landscape has changed drastically over the past couple of years:**
 - Noncompliance risk high when significant activities or resources are not disclosed or partially disclosed
 - New and continuously changing guidance and rules from federal sponsors
 - New expectations on timeliness and completeness of disclosures
 - Particular scrutiny by federal sponsors on researcher effort commitments, and researcher outside activities and resources
 - Federal sponsors not harmonized on external disclosure expectations/requirements, though this is apparently coming (implementation of NSPM-33)
- **Managing disclosures is a shared responsibility**

Primary Areas of Concern for Disclosures

- Completeness, accuracy, and timeliness
- Inclusive of all affiliations and commitments/concept of total professional effort
 - internal and external
 - domestic and foreign
 - paid and unpaid
- Reflecting all sources of research support
 - internal and external (true gifts remain a carve-out, in *most* situations)
 - domestic and foreign
 - funded or in-kind
- Identification of potentially duplicative funding (i.e. overlap)

Conflict of Interest Process and System

Current and Pending and Individual Portfolio Report (IPR)

Current and Pending Report

- IW Report located in the Sponsored Research folder
- This report shows all active awards in PeopleSoft and all pending proposals in Coeus or Princeton ERA that have been submitted to the sponsor but have not yet been awarded for a faculty member in which they are the PI or Co-PI
- For pending Princeton ERA Proposals, this report will also show the effort entered into the budget for the PI or Co-PI
- Unrestricted access on this report
- Working on a way to show Internal Grants on this report

Individual Portfolio Report

- IW Report located in the Financial Management and Sponsored Research folder
- This report shows all the active sponsored projects that the faculty member is the PI on and all non-sponsored sources of funding in which the PI's program has been used
- Access is limited to PI's Home Department and chartfields that user has access to
- Working on a way to better identify Internal Grants on report

Additional Resources

Additional Resources & More to Come

- Review the ORPA [Inappropriate Foreign Influence Website](#)
 - Use the [Quick Guide to Disclosures](#) as a reference
 - explains the difference between internal and external disclosures
 - guides the questions you ask from researchers
 - Additional checklists are in development

Additional Resources & More to Come

- Per messages this fall from Dean Pablo Debenedetti:
 - Highlight of two recent notices issued by the National Institutes of Health:
 - [NOT-OD-21-073](#) (issued 3/12/21)
 - [NOT-OD-21-110](#) (issued 4/28/21)
 - Changes are effective 1/25/22
 - Particularly relevant to researchers and research administrators who propose or manage NIH-funded projects
 - NIH-funded units may now request access for departmental grants administrators to information contained within the COI system

Additional Resources & More to Come

- Disclosure Workshops with your GCA
 - Similar to Effort Workshops, you bring the questions/case studies and ORPA will help guide you through the process
 - Contact Eszter Rudy at erudy@princeton.edu to schedule your workshop

Labor Accounting Alerts For RCR and E-Verify Compliance

What is RCR?

- RCR is the Responsible Conduct of Research. RCR promotes the aims of scientific inquiry, fosters a research environment that enables scientists to work together toward common goals, and promotes public confidence in scientific knowledge and progress for the public good.
- **This not FCOI or human subjects training.**
- RCR training is required on NIH, NSF and USDA NIFA awards
 - NIH requires in person training
 - NSF and USDA NIFA requires either CITI online or in person training.
 - During the Public Health Emergency and through 12/31/21, NIH will allow for CITI online training.
- RCR training must be completed by the time the support paid to the individual working on the award ends.
- Non-compliance may result in the removal of this individual's earnings and associated indirect costs from this project
- Areas of risk we have seen in our experience





What is E-Verify?

- E-Verify is a web-based system that checks information entered on the I-9 against records available to the Social Security Administration (SSA) and Department of Homeland Security (DHS).
- This is required for most federal contracts, effective Sept.8,2009
- This must be completed for personnel assigned to the contract and prior to when they start working on the federal contract.
- Employees hired prior to 11/6/1986 are exempt.
- Non-compliance may result in the removal of this individual's earnings and associated indirect costs from this project
- Areas of risk we have seen in our experience

Monitoring tools

- There are 2 ways to help departments monitor e-Verify and RCR compliance:
 - IW reports for e-Verify and RCR that can be run on demand by each unit. Summary reports indicating non-compliance are sent by ORPA monthly.
 - Alert messages in Labor Accounting when someone is committed to a Project that has either RCR or e-Verify requirements.
 - These messages are project specific, so please ignore it if the individual is compliant.
 - For RCR, the message only pertains to applicable individuals(graduate and undergraduate students, post docs, visiting student research collaborators (VSRCs), and short-term visiting researchers)

RCR and e-Verify LA Alert

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	041		97.000	.970	6,253.34	PRINU		A0023	<input type="checkbox"/>	5452					
	001		3	.03	.00	PRINU		A0002	<input type="checkbox"/>	5053					
	041		3.000	.030	193.40	PRINU		A0023	<input type="checkbox"/>	5452					
					6,446.74										
09/01/2019	001		100	1.0	.00	PRINU		A0002	<input type="checkbox"/>	5053					
	041		100.000	1.000	1,307.54	PRINU		A0023	<input type="checkbox"/>	5452					
					1,307.54										
09/08/2019	001		97	.97	39,734.44	PRINU		G0001	<input type="checkbox"/>	5053			GRANT		101
04/16/2020													GRANT		101
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FY Total					67,400.07										

- Individual must complete Responsible Conduct of Research (RCR) training to be paid from Project 10012007. Non-compliance may result in the removal of all support for this individual. Resources: RCR status report in the Information Warehouse, RCR requirements and training options on the ORPA website.
- Individual must be e-Verified to be paid from Project 10012007. Non-compliance may result in the removal of all support for this individual. Resources: e-Verify status report in the Information Warehouse, Annual e-Verify Notice on the ORPA website, and e-Verify information on the HR website.

[Close](#)

