Coffee with ORPA 2022-2023
January 23, 2023

Transitions & Changes

Presented by:
Courtney Kohut, Training & Shared Services Manager ORPA
Paula Looney, Assistant Director, ORPA
Hope Caldwell, Associate Director, Research Integrity & Assurance
Karla Ewalt, Senior Associate Dean for Research, Office of the Dean for Research
Welcome our new Contracts Manager

Updates on Disclosure Integrity/Inappropriate Foreign Influence Mandatory Training
  Research Administrator Training
  Faculty Training
  Annual COI Disclosures for Faculty

DOE FCOI – CITI Training
  Review of Information in ERA Proposals Module

RCR/RECR Requirement
  Policy update – expanding to faculty, when goes into effect.

Effort for Faculty & Other Senior Personnel in Proposal Budgets

NSF & NIH Sponsor Updates

Change in F & A Rate

Open Discussion and Q & A
Liz Powell

- Contracts Manager
- liz.powell@princeton.edu
- (609) 258-1635
- Started January 3, 2023
- Your GCA will coordinate agreements to Liz. Continue to work with your GCA on routing contracts & agreements through the ERA Agreements module
Additional Changes in GCA Department Support

› Changes in department assignments

› Department Contacts on ORPA Website
Disclosure Integrity
Training Updates

Courtney Kohut
Training & Shared Services Manager
Office of Research & Project Administration
Previously Inappropriate Foreign Influence

December 2, 2022, announcement via ORPA News regarding the resumption of mandatory training for Research Administrators

Two virtual sessions took place – December 16 & December 21, 2022

Targets those who directly work with proposal submission documents, specifically Biographical Sketch and the Current & Pending (Other) Support and Facilities

What sponsors are looking for, how to work through the proposal documents, create conversations and assist in navigating requirements
Mandatory Research Administrator Training

Over 318 have attended training since 2020, with only 9 in the RA population still needing completion – will be contacted directly.

All attendees of the December 2022 sessions received a SurveyMonkey, asking for feedback. 43 attendees – only 5 responded! Your feedback is greatly appreciated!

Additional virtual sessions for February – for those who have not yet completed, and those who wish to receive the latest updates since the 2020-2021 sessions. Dates to be announced.
Disclosure Integrity

Mandatory Faculty/Researcher Training Updates

Training for Faculty will take place in-person on **January 25th** and virtual options **January 30** and **February 2**, prior to the annual Conflict of Interest Disclosures (additional virtual options to be scheduled).

Targets all divisions this round – previously only Divisions 3 & 4
- Humanities (1) & Social Sciences (2): those with **Federal Funding** (faculty/senior researchers)
- Natural Sciences (3) & Engineering (4): previously only Division 3 & 4 (all faculty/senior researchers)

Sessions delivered by outside expert in collaboration with ORPA; ORPA, RIA, DOF and OGC and outside counsel collaborated on the presentation materials.

Deeper dive into the regulations and requirements around disclosing outside affiliations and appointments, encouraging openness and transparency.
Disclosure Integrity

Importance of Identifying Senior/Key Personnel

- PI’s and Co-PI’s should be identified as Key Personnel in ERA
  - Are responsible for completing an annual COI disclosure, and their effort commitments must be managed.
  - Are you including a biosketch/current & pending (other) support doc? If yes, these are key individuals on a proposal/award (not required for NIH other significant contributors)
  - If someone identified as key leaves the university, sponsor approval is required as key is defined as integral to a projects scope.
  - If you see a post-doc, graduate student or visiting researchers as key – check with your PI if this accurate.
    - Post-docs are essentially short-term positions in which they are likely leaving during the projects period of performance.
    - Neither graduate students or post-docs have PI status if they are identified as Co-PIs
Annual Conflict of Interest Disclosures

- Next round of disclosures open on **January 31, 2023** and are due by March 15, 2023.
- Updates to disclosures can (and in some cases must) be made year-round.
- **Slides for Research Administrators** on **Disclosure Integrity** are available on the Inappropriate Foreign Influence web page to help with questions from PI’s on the disclosure process (what to disclose, etc.)
- Guidance on Conflict of Interest is available on the **RIA website**.
Princeton Research & Assurance

Department of Energy Conflict of Interest Policy
Princeton Implementation

Hope Caldwell
Associate Director of COI
The Department of Energy (DOE) issued an Interim COI Policy that is largely aligned with long-standing COI regulations established by the Public Health Service (42 CFR part 50, Subpart f).

**Purpose:** to establish standards that provide a reasonable expectation that the design, conduct and reporting of DOE-funded projects will be free from bias.

**Key differences from PHS:** Requires specific certification language to be signed by investigators for each COI disclosure and an organizational conflict of interest policy.

**Applicability:**
- Institutions applying for or receiving DOE funding by means of a financial assistance award, such as a grant, cooperative agreement or technology investment agreement
  - For consistency purposes, Princeton University will apply the policy to all DOE-funded investigators.
- Investigators planning to participate in or are participating in DOE-funded projects.
- DOE SBIR/STTR Phase II applicants/awards – it does NOT apply to Phase I.
Princeton’s Responsibility

- Maintain an up-to-date, written, enforced FCOI policy that complies with the DOE Interim COI Policy for financial and organizational COI. Make the policy available via a publicly accessible website.

- Inform Investigators of the Institution’s FCOI policy, Investigator’s responsibilities regarding disclosure of significant financial interests (SFIs) and DOE’s Interim COI policy.

- Train Investigators.

- Appoint a designated COI official at the institution.

- Identify and manage FCOIs held by investigators.

- Report FCOIs to the federal agency (DOE).

>(*Princeton had the above already established due to PHS requirements*)

- Disclose any potential or actual organizational COI to DOE – this requirement is new from PHS requirements.
Investigators' Responsibility

- Training – Complete FCOI training prior to engaging in DOE-funded research
  - Every 4 years
  - CITI PHS module on FCOI is acceptable

- Disclose significant financial interests (SFIs)
  - Annually via COI annual disclosure Form
  - Throughout the year, within 30 days of acquiring an SFI, via the COI Update Form

*(All Princeton DOF Appointees have been required to do the above forms, regardless of funding since at least 2019)*

- Disclose sponsored travel

- Certify to specific DOE language on disclosure forms (annual and update)

*Investigator* = principal investigator and any other person regardless of position who is responsible for the purpose, design, conduct or reporting of a project funded by the DOE or proposed funding
Princeton approach so far

- Notified and required all investigators on renewals or new awards to complete the FCOI training through CITI; and followed up regarding noncompliance
- Created a solution with OIT to include DOE investigators within the NIH group in order to monitor the training requirement via the existing COI system
- Added certification requirement to the 2022 Annual Disclosure form and the 2023 Disclosure Update form
- Communicating DOE information to all DOF appointees through the annual disclosure form launch, January 31, 2023
- Updates to PHS related policy on RIA website to include all DOE funded projects
- Presentations in other forums to educate research administrators and faculty about the new requirements
- RIA and ORPA continue to work together to streamline processes and engage OGC as needed
Organizational COI

The DOE Interim Policy states that organizational COI means:

A situation where because of relationships with a parent company, affiliate or subsidiary organization, the non-federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving the related organization.

If an institution has a parent, affiliate or subsidiary organization, it must (among other requirements) maintain written standards of conduct covering the organizational COI.

RIA and ORPA are evaluating with OGC any examples where this requirement would be applied.
How can you help?

- Please check to see if investigators have completed CITI Training prior to submitting to ORPA
- Please help RIA and ORPA with reminders regarding the training requirement
- Department managers may need look for DOE investigators under the “NIH” category if looking up information in the COI system
- Spread the word in DOE communities
DOE FCOI

> Begin checking for CITI training completion at proposal stage, just like PHS.

> The training is preparing the PI “who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE”.

> Cannot setup an award until the training is complete and current (expires every 4 years).

> When awarded, a new COI attribute will be added to Notice of Award documents, indicating this requirement.
ERA & Verifying CITI Training

CITI Training compliance is currently checked in ERA when you run the "Display Team COI Information" on every proposal (contracts, grants, cooperative agreements).

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<thead>
<tr>
<th>Principal investigator / Mentor:</th>
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<th>Senior / Key Personnel and Other Significant Contributors:</th>
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PI does not have a current CITI training date.

Co-PI has never taken training – contact your GCA.
Responsible Conduct of Research (RCR)

2023 Updates

Karla Ewalt
Senior Associate Dean for Research
Responsible conduct of research (RCR), also known as responsible and ethical conduct of research (RECR), is a required training initiative for post-graduate education and sponsored research.

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
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<tr>
<td>2010</td>
<td>Princeton RCR program</td>
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<tr>
<td>2016</td>
<td>OIG program review</td>
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<tr>
<td>2023</td>
<td>Major RCR program update</td>
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- **pre-2010**
  - Individual grant compliance
  - Longstanding NIH requirements for RCR training were the responsibility of PIs and departments

- **2010**
  - Princeton RCR program
  - America COMPETES Act, broad NSF requirements implemented

- **2016**
  - NSF implementation reviewed at 30+ institutions

- **2023**
  - CHIPS and Science Act, broadens NSF training requirements substantially
RCR Program Update - forecast

All grad students and postdocs in social sciences, natural sciences and engineering receive training as professional development. This training must also meet the federal agency requirements of grant awards supporting the researcher. *no change to training requirement; updates to training*

All others (faculty, senior personnel, undergraduates, VSRC) receive training as required by grant awards. *add faculty and senior personnel; add expectations for timing*

Training for faculty and other senior personnel is distinct from the training given to students and postdocs. *expect new training to be developed*

Training on certain topics may satisfy multiple requirements, e.g., research security, inappropriate foreign influence, and may roll out over time. *look for alignment*
# RCR Program Update - Timeline

Implementation of new NSF requirements, as training resources are developed nationally and locally. Natural opportunity to refresh program.

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<th>Winter 22-23</th>
<th>Spring 2023</th>
<th>Summer 2023</th>
<th>AY 2024</th>
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<td><strong>Assessment</strong></td>
<td><strong>Policy Update</strong></td>
<td><strong>Effective Date</strong></td>
<td><strong>Updated and</strong></td>
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<td>Learning resources</td>
<td>Key principles</td>
<td>NSF awards July 31</td>
<td><strong>New Training</strong></td>
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<td>Leadership</td>
<td>NSF-sponsored</td>
<td>Update courses</td>
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<td>Review existing</td>
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Office of Research and Project Administration
RCR Policy Working Group

Karla Ewalt, Office of the Dean for Research
Elizabeth Adams, Office of Project and Research Administration
Oliver Avens, Office of the Dean of the Faculty
Geoffrey Hill, The Graduate School
John Jenkins, Office of Project and Research Administration
Courtney Kohut, Office of Project and Research Administration

Christine Murphy, The Graduate School
Alice Seneres, Office of the Dean of the Faculty
Francine Taylor, Office of Project and Research Administration
RCR Training Pedagogy Working Group

Karla Ewalt, Office of the Dean for Research
Elizabeth Adams, Office of Project and Research Administration
Wind Cowles, Princeton University Library
Kelly Godfrey, The McGraw Center
Christine Murphy, The Graduate School
Laura Murray, The McGraw Center
Anu Vedantham, Princeton University Library

Goals
- Ensure compliance of the RCR courses with evolving federal requirements to incorporate new topics
- Improve the RCR courses for graduate students and postdocs by connecting the community of instructors with their peers, RCR information, and educational materials and resources
- Support the professional development of the next generation of scientists (social, life and physical scientists) and engineers as ethical and responsible researchers
RCR Background Information

▷ Princeton’s current RCR Policy (last updated 2015)

▷ CITI Program training resources (available to all affiliates with Princeton U)

▷ NSF 2022 Research Security Training for the United States Research Community awardees announced (Dec 9, 2022)
Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (42 U.S.C. 1862o–1) is amended by—(1) striking “and postdoctoral researchers” and inserting “postdoctoral researchers, faculty, and other senior personnel”; and (2) by striking the period and inserting the following: “, including—“(1) mentor training and mentorship;“(2) training to raise awareness of potential research security threats; and“(3) Federal export control, disclosure, and reporting requirements.”.
“Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 USC 1862o–1), as amended, to have a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to faculty and other senior personnel who will be supported by NSF to conduct research will go into effect for new proposals submitted or due on or after July 31, 2023. NSF,...”

“Accordingly, it is the responsibility of each institution to determine the content, focus and the delivery method for the RECR training.[69] Such content, however, must include mentor training and mentorship as noted in Section B.1 above.”
Senior Personnel Effort on Proposals

Paula Looney
Assistant Director
Office of Research & Project Administration
Minimal Committed Effort (as appropriate)

- Based on appointment type: 9 months, 12 months
- 1% which is represented at 0.01, but this does not equal 0.01 person months!
- 9 month appointment x 0.01 = 0.09 of a month for C & P
- Effort reporting system calculates effort by percentage of a month, or 9% of one month over the course of a year.
  - 9 month appointment, 1% is about 2.7 days over the course of a year. 30 days x .09 = approximately 2.7 days.
  - 12 month appointment, 1% is about 3.6 days, 12 x .01 = .12 of a month. 30 x .12 = approximately 3.6 days
NSF & NIH
Sponsor Updates
NSF Updates

- Full transition from FastLane to Research.gov, effective with the new PAPPG guide effective as of January 30, 2023. (PAPPG 23-1)
  - Last day for proposal submissions via FastLane is January 27, 2023
  - Last day to submit a proposal file update is September 29, 2023
  - Last day to download FastLane submitted proposals is September 29, 2023
- Carefully review the Summary of Changes to the PAPPG (NSF-23-1)
  - Includes details around the RECR training requirement now for faculty and other senior personnel (which also covers mentor training and mentorship), is applicable to proposals submission on or after July 31, 2023.
- SciENcv implementation has been delayed until October 2023
  - SciENcv and the NSF fillable format will be continue to be available as an option until then.
  - Continue to work with your Pis on getting setup – other sponsors (DOE included) will switch to SciENcv
- Changes to disclosures must be submitted to NSF within 30 days
NSF Updates

New Biographical Sketch and Current & Pending (Other) Support documents

- Revised versions posted as of 1/19/2023 – check dates
- For use on or after January 30, 2023
- Regularly check the NSF Policy Office website for new information!
- Now require a ‘signature’, attesting to the certification language, that indicates that the information provided in these documents is accurate, current, and complete. (will also be required in the SciENcv format)
  - No requirement for signature software like DocuSign for the signature by the senior personnel.
- Webinar from Thursday, January 19th available on the NSF website (slides & recording) – filter to 2022 & presentation type
- New versions being uploaded today, January 19th as per Jean Feldman
NSF Updates

NSF program officers will request **updated** Current and Pending (Other) Support prior to making a funding recommendation, and at any subsequent time the agency determines appropriate during the term of the award in accordance with **NSPM-33**.

- If there are no changes from the originally submitted C & P support, the individual would resubmit with a new timestamp.
- Funding recommendations cannot be completed under C & P support has been updated for **all** senior personnel.
- Carefully read the NSF Disclosure Requirements section in the new PAPPG.
NIH Updates

Nick Policy for Data Management and Sharing effective **January 25, 2023**

- Data Management & Sharing Policy
- Budgeting for Data Management & Sharing
- Samples Data Management Plans
- If uploading a DMP, this must be included in ERA ‘other direct costs’ on its own line, and in the NIH budget (Assist) with $0, you must also include a separate line item either with $0 (if none and you uploaded a Data Management and Sharing Plan), or with a dollar amount as applicable (discuss with GCA if not $0).
- Before budgeting DMS costs as direct costs in your proposal, consider whether resources at the Library must be sufficient to support your project in this regard.
  - [https://researchdata.princeton.edu](https://researchdata.princeton.edu)
NIH Updates

- **Forms-H** required on or after **January 25, 2023**
- Kyle sent out information regarding the use of these forms for s2s submissions on January 9th.

Forms-H are available in ERA as of January 19, 2023, so if you prepared your application and linked it prior to this date, the wrong forms may be applied.

- **Salary Cap updated to $212,100** (reflected on the rate sheet)
Working with our new Indirect Cost Rate – 64%

Paula Looney
Assistant Director
Office of Research & Project Administration
Budgeting with new IDC

- 64% is effective as of 7/01/2024 (FY2025)
- Utilize the Blended IDC Tool on the ERA website under Tools.
- ERA will automatically calculate the correct rate – see the ERA Budget Guide for full instructions – see page 82 for details.

Some sponsors are requesting revised budgets prior to making a new award – so you may need to make edits at a sponsors request utilizing the new 64% rate.
NIH Budgeting with new IDC – s2s

- If doing s2s – cumulative budget total in the application will not match your budget in ERA and on the proposal cover page (SF424).
  - Kyle created a guide on this glitch!
  - Huron creates two row for each IDC rate – and the calculations are off by around $25
  - No warnings or errors when submitted – so is OK.
  - System is using more than two decimal places, so the calculated amount is slightly different for cumulative total.

- Suggested accommodation: For totals to match, you can just change the cover page amount to match your cumulative budget page amount – but then this will not match your ERA budget total.

- If you encounter this, work with your GCA!