Coffee with ORPA:
What’s New and Brewing?!

March 19, 2019

Presenters:
Elizabeth Adams
Davina Brittingham
Chi Chung

Maria Hartstein
Paula Looney
Maureen Thompson-Siegel
What’s New and Brewing?!

- ORPA Director Announcements

- Sponsor Updates
  - NSF PAPP Guide and Significant Updates, C&P Disclosures
  - NIH Significant Changes, C&P Disclosures

- ORPA Updates, Refreshers, Quiz, and Upcoming Events
  - ORPA Business/Process Improvements, Carry Forward, Fabricated Equipment, Non Funded Agreements, Subawards, Quiz and Upcoming Events
ORPA Business Improvements...

Process Mapping

ORPA and PATCO Staff

Appx 10 meetings held between November 2018 and February, 2019

Using the 80/20 rule, mapped 21 ORPA Business Processes; for example...

- Proposal Set-up and Approval
- Award Set-up and Modification
- Subaward Set-up
- Pre-award Spending
- Export Controls
- IRB and IACUC Review
ORPA Business Improvements, initial and future changes...

**Initial changes in process**
- Delegate no cost extension award modifications to Specialists

**Ongoing**
- ORPA & SRA Quarterly Meetings
  - First meeting held December 13, 2018 – Simons
  - Next meeting: March 28, 2019
- ORPA Staff Professional Development
- University-Industry Partnerships (UDIP) Contracting Webinar Series

**Future changes**
- Delegate award funding and time increments to Specialists
- Revise PI Certification
- Revise Standard Research Agreement
Sponsor Updates
NSF Updates and Clarifications...

Revised PAPPG effective 2/25/2019

Most significant changes apply to:

- Policy on Sexual Harassment
- Synergistic Activities (Clarification)
- Current and Pending
NSF SEXUAL HARASSMENT POLICY

Why?

NSF is committed to promoting safe, productive research and education environments for current and future scientists and engineers.

February 2018 – NSF released harassment notice to Universities, Colleges and other NSG grantee organizations. “NSF does not tolerate sexual harassment, or any kind of harassment."

October 2018 – Term and condition released requiring awardee organizations to report findings of sexual harassment.

Policy applies to PIs and co-PIs named on NSF awards or funding increments on or after October 21, 2018.

Princeton must report when PIs are under investigation, on administrative leave or terminated due to sexual harassment concerns.

February 2019 – New language regarding NSF funded conferences
Conferences

new language now requires conference proposers to have a policy or code-of-conduct that addresses sexual harassment, other forms of harassment, or sexual assault, and that includes clear and accessible means of reporting violations of the policy or code-of-conduct. This policy or code-of-conduct must be disseminated to conference participants prior to attendance at the conference as well as made available at the conference itself.
NSF Sexual Harassment Policy - Resources

- NSF Sexual Harassment Portal: https://www.nsf.gov/od/odi/harassment.jsp
Five distinct examples are allowed to demonstrate the broader impact of the individual's professional and scholarly activities.

For example:
- Innovations in teaching and training (e.g., development of curricular materials and pedagogical methods);
- Contributions to the science of learning;
- Development and/or refinement of research tools;
- Computation methodologies and algorithms for problem-solving;
- Development of databases to support research and education;
- Broadening the participation of groups underrepresented in STEM;
- Service to the scientific and engineering community outside of the individual’s immediate organization.

March 2019 – NCURA conference Jean Feldman emphasized...
- “5 is 5 is 5!”
February 2019 – Dean for Research issued letter reminding Princeton’s research community of the need “to provide complete and accurate information on all sources of support”

NSF policy:

“All current project support from whatever source (e.g., Federal, State, local or foreign government agencies, public or private foundations, industrial or other commercial organizations, or internal funds allocated toward specific projects) must be listed. The proposed project and all other projects or activities requiring a portion of time of the PI and any other senior personnel must be included, even if they receive no salary support from the project(s).”

https://orpa.princeton.edu/news/disclosing-all-sources-support-grant-applications-information-princeton-research-community
NIH Updates...
NIH SEXUAL HARASSMENT POLICY

› September 2018 – NIH Director Statement regarding sexual harassment in science and reports from #MeTooStem Movement.

› November 2018 – Requirements for inclusion of institutional letter of commitment against discriminatory harassment and practices in NIH Training Grants, effective 1/25/19.

› February 2019 – NIH Update – Policy applies to PIs and Key Personnel named on NIH awards.

› Must report when PIs or Key Personnel are under investigation, on administrative leave or terminated due to sexual harassment concerns.
NIH – Sexual Harassment Policy

› Grants Affected: T15, T32, T34, T35, T36, T37, T90/R90, TL1, TL4

› Letter should be included with Letters of Support on PHS 398 Research Training Program Plan form.

› Failure to include letter can result in withdrawal of application.
NIH Sexual Harassment Policy - Resources

› Dean for Research and the Institutional Equity and Diversity Office of the Provost letter available on ORPA website under Forms -

› More information & updates:
NIH: Disclosure of Current & Pending
(A/K/A: Other Support, Active and Pending)

August 2018 – NIH Director issued letter expressing concerns of inappropriate foreign influence in U.S. research enterprise.

Key Points:
- Foreign entities have systematic programs to influence NIH researchers and peer reviewers.
- Diversion of IP to other entities and countries.
- Sharing of confidential information by peer reviewers with others.
- Failure by researchers at NIH-funded institutions in U.S. to disclose substantial resources from other organizations, including foreign governments and foreign institutions of higher learning.
- Distorting view of appropriate use of NIH funds.
NIH: Disclosure of Current & Pending

- Provide complete and accurate information on all sources of support in federal grants and contracts.
- Applies to Senior/Key Personnel
- What does “Other Support” include?
  - All financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards.
  - Does not include training awards, start-up funds, rebate accounts, prizes, and gifts.
NIH: Budgetary Levels FY2019

- New stipend levels for Kirschstein-NRSA awards. [NOT-OD-19-036](#)
- Overall increase of 2% from last FY.
- Updates on the Institutional Information section of ORPA website and Rate Sheet.
- Salary cap for FY 2019 did not change and remains set at Executive Level II ($189,600)
- BIG PICTURE: NIH received 5.6% increase over FY 2018 funding for total of $39.3 billion.
NIH: New Investigator R01 Applications

Who is a New Investigator?

- No previous substantial and independent NIH funding.
- PI who previously received a competing NIH R01 does not qualify.

*R01: Research Project grant award made to support a discrete project performed by PI in area of PI’s specific interest and competencies.
NIH: New Investigator R01 Applications

OLD rule: NIH allowed NI option to resubmit R01 A1 resubmission applications for consecutive review cycles ("next round submission").
  Reasoning: Allow NIs to resubmit applications rapidly and accelerate their funding.
  Use of option low among NIs.

NEW rule: Effective 1/25/19, A1 resubmission of NI R01 applications will be accepted on the resubmission date of any Program Announcement that accepts resubmissions.

NIH will continue to make special accommodations for NI R01 applications, by retaining clustered review and preferential release of summary statements (prioritized and released first).
NIH: Foreign Component

› Arises in Field 6 on R&R Other Project Information Form

› Check “Yes” if project includes a “foreign component”
› Include foreign justification as attachment in Field 12 of Form.
› Foreign travel exclusively for consultation is not considered a foreign component.
What may qualify as a foreign component?

- Performance of any significant element or segment of project outside U.S. either by recipient or researcher employed by foreign organization, whether or not grant funds are requested.
- Involvement of human subjects or animals at foreign site.
- Extensive foreign travel by recipient project staff to collect data, survey, collect samples, etc.
- Any activity of recipient that may impact U.S. foreign policy through involvement in affairs of a foreign country.
- Collaborations with investigators at foreign site anticipated to result in co-authorship.
- Use of facilities/instrumentation at foreign site.
- Receipt of financial support or resources from foreign entity.
Recent Changes

November 2018
- Send all requests to: subaward@Princeton.edu

February 2019
- In order to maximize efficiency and streamline processing turnaround time, subaward requests are identified by contract type upon receipt and redistributed between Maria and Teresa. Such redistribution allows us to conduct a more focused review of complex subawards, such as foreign, federal contracts and for profit requests which minimizes the processing time for all other requests.
Subaward Updates – Continued

Coffee with ORPA – April 18, 2019

- Per survey conducted recently, Grants Managers’ Group indicated an interest in reviewing full subaward lifecycle.
- Covering, forms, checklists, processing, invoicing, roles and responsibilities and much more! It’s not too late to send additional comments in survey monkey.
- Look for new subaward checklists at CWO in April!
What is Restricted Carry Forward?

A Carry Forward request is the process by which funds remaining at the end of a budget period may be moved to the next budget period to cover allowable costs in the next budget period.

Some grants have automatic Carry Forward authority, and grantees do not have to request approval from the sponsor in order to Carry Forward funds from one budget period to the next.

Grantees that do not have automatic Carry Forward authority are required to submit a written request to the sponsor.
Two Types of Carry Forward

▷ Carry Forward *without* Activities
  ▷ No Activities are created if the sponsor terms state that permission needs to be requested and granted to Carry Forward *unspent* balances.

▷ Carry Forward *with* Activities
  ▷ New Activities are created if the sponsor states that spending has to occur in a particular budget period.
How do I know if an Award has Restricted Carry Forward?

The Notice of Award (NOA) will have the appropriate Carry Forward Attribute listed under **Additional Award Details**.

- **RestrCarryFwd w/o Activities**
- **RestrCarryFwd w/ Activities**
### Additional Award Details

**Attribute Type:**
- FFATA
- PHS FCOI
- Restr/Carry Fwd w/o Activities
- Uniform Guidance - 12/20/2014

### Project Information

#### Obligated Funding

<table>
<thead>
<tr>
<th>Project</th>
<th>Project Title</th>
<th>Department</th>
<th>Fund</th>
<th>Project Dates</th>
<th>Activity</th>
<th>Activity Dates</th>
<th>F&amp;A Rate/Base</th>
<th>Obligated Amount</th>
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</thead>
<tbody>
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<td>Computational Methods for Iden</td>
<td>25506 - COS Research</td>
<td>G0001</td>
<td>07/01/2018 - 06/30/2019</td>
<td>101</td>
<td>07/01/2018 - 06/30/2019</td>
<td>ON 62% / MTDC</td>
<td>33,172.00</td>
</tr>
</tbody>
</table>

**Total**

33,172.00

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**Attribute Type:**
- FFATA
- PHS FCOI
- Restr/Carry Fwd w/ Activities
- Uniform Guidance - 12/20/2014

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<th>Activity Dates</th>
<th>F&amp;A Rate/Base</th>
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<td>24400 - PNI-Princeton</td>
<td>G0001</td>
<td>09/06/2014 - 07/31/2015</td>
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<td>24400 - PNI-Princeton</td>
<td>G0001</td>
<td>09/06/2014 - 07/31/2015</td>
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<td>09/01/2016 - 07/31/2016</td>
<td>ON 62% / MTDC</td>
<td>1,312,588.00</td>
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</table>
Common Restricted Carry Forward Awards

› NIH T, P and U Awards (when Princeton is the PRIME RECIPIENT)

› Simons Foundation Awards
  › The Simons Foundation is also not responsible for unallowable expenditures as noted in the Request for Application (RFA), expenditures that are inconsistent with the approved grant proposal or research plan, or expenditures that exceed the total funded amount of the grant annually.

› Awards where we are a subaward and the sponsor institution added restricted Carry Forward (even though the Prime Awarding agency did not have the term)
Restricted Carry Forward Awards

› 80 awards with a Restricted Carry Forward Attribute
  › 37 Federal Funds thru an Institution of Higher Education
  › 13 NIH Awards (T’s, U’s, P’s, S10, R13)
  › 12 Simons Awards
  › 5 Foundation
  › 4 Foreign
  › 3 Hospitals
  › 6 Other
Restricted Carry Forward Roles

**ORPA** sets up Activities in PeopleSoft under the Award # and issues the NOA with the appropriate Carry Forward Attribute. Only one or two Activities will be open at any given time, dependent on sponsor.

**SRA** submits financial reports to sponsor in line with sponsor requirements and confirms the valid Carry Forward amount.

**DEPARTMENT** works with **ORPA** to submit a formal Carry Forward request, if necessary.

**ORPA** restricts funds requested to be carried forward from current activity.

**SPONSOR** notifies **ORPA** if/when the Carry Forward is approved and **OPRA** confirms this amount with **SRA** before updating the approved funds to the budget in the next activity.

**ORPA** issues an NOA that the Carry Forward was approved.
Fabricated Equipment

What is Fabricated Equipment?

- Policy can be found in the policy library for the Office of Finance and Treasury
  - Fabricated equipment represents the costs incurred to fabricate non-expendable, tangible property by building or assembling various components and or materials into one identifiable unit.
  - [https://finance.princeton.edu/policy-library/sponsored-research/fabricated-equipment-poli/](https://finance.princeton.edu/policy-library/sponsored-research/fabricated-equipment-poli/)

- Fabricated Equipment is a unique, identifiable, and discrete item that has a useful life of more than one year, and is made of material and components which cumulatively cost $5,000 or more.
Fabricated Equipment

Prior to requesting approval of Fabricated Equipment

- Consider if you need sponsor approval for equipment purchases
- Check the NOA/Award Documentation
- Was this piece of equipment proposed in the approved budget?
- Is there a change in scope?
- If prior approval is needed, request approval via an OPAR

Requesting Approval to Fabricate Equipment

- Submit Completed Fabricated Equipment Request, Modification, and Completion Form to ORPA for review and approval
- Request approval PRIOR to the assembly and capitalization of the item, regardless of whether the fabricated equipment item was included in the original proposal budget
# Fabricated Equipment Request, Modification, and Completion Form

**Instructions**

Please complete and sign this form for the Fabricated Equipment Items on sponsored projects (G0001 and G0002) and send to your ORPA Administrator.

**Section I: Fabricated Equipment Item Selection**

- [ ] ITEM INITIATION REQUEST
- [ ] ITEM MODIFICATION REQUEST (COMPLETE FIELDS BELOW THAT ARE BEING MODIFIED. NOT NECESSARY FOR A DATE EXTENSION ONLY)
- [ ] ITEM COMPLETION

**Section II: General Information**

<table>
<thead>
<tr>
<th>PS AWARD #</th>
<th>PROJECT #</th>
<th>CPEF ISP #</th>
<th>PRINCIPAL INVESTIGATOR NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>FABRICATION START DATE (MUST BE ON OR AFTER EFFECTIVE DATE OF AWARD)</th>
<th>ESTIMATED COMPLETION DATE (MUST BE ON OR BEFORE AWARD END DATE)</th>
</tr>
</thead>
<tbody>
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</table>

<table>
<thead>
<tr>
<th>FABRICATED EQUIPMENT ITEM NAME (USED AS PRIMARY ITEM NAME IN ASSET RECORD WHEN COMPLETE)</th>
</tr>
</thead>
<tbody>
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</table>

<table>
<thead>
<tr>
<th>FABRICATED EQUIPMENT ITEM DESCRIPTION</th>
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</table>

<table>
<thead>
<tr>
<th>ESTIMATED USEFUL LIFE AFTER COMPLETION</th>
<th>LOCATION OF FABRICATION CONSTRUCTION (BUILDING/ROOM/OTHER)</th>
<th>ON CAMPUS</th>
<th>OFF CAMPUS</th>
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</table>

**IS THE COST OF THIS ITEM BEING SUPPORTED BY OTHER FEDERAL AWARDS WITH FE PROJECTS?**  
- [ ] YES  
- [ ] NO  

If YES, please provide each project number and its allowable share of the cost below. Attach additional document if more than four projects are sharing the cost.

<table>
<thead>
<tr>
<th>OTHER PROJECT #1</th>
<th>AMOUNT #1</th>
<th>OTHER PROJECT #2</th>
<th>AMOUNT #2</th>
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<table>
<thead>
<tr>
<th>OTHER PROJECT #3</th>
<th>AMOUNT #3</th>
<th>OTHER PROJECT #4</th>
<th>AMOUNT #4</th>
</tr>
</thead>
<tbody>
<tr>
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</table>
### Section III: Fabrication Budget (Attach additional lines as needed)

Include only Material and Non-Salary Services; for Modification requests, enter revised budget.

<table>
<thead>
<tr>
<th>Budget Category</th>
<th>For New Requests, Enter Cost Below</th>
<th>For Modification Requests, Enter +/- Cost Adjustments Below</th>
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<tbody>
<tr>
<td></td>
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</table>

**Budget for New Requests $**

**Total Budget Change for Modification Requests $**

### Section IV: To be completed by ORPA for Item Initiation Requests

Check box to confirm action completed

- [ ] Fabricated Equipment Attribute - Added to PS Project

### Section V: Item Completion

<table>
<thead>
<tr>
<th>Actual Completion Date</th>
<th>Final Fabrication Cost</th>
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</table>

**Location of Fabricated Equipment Item**

<table>
<thead>
<tr>
<th>Building</th>
<th>Room</th>
<th>Responsible Department</th>
<th>Point of Contact (If Other Than PI)</th>
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**Princeton University**

Office of Research and Treasury

701 Carnegie Center
Princeton, NJ 08540

Phone (609) 258-3080
Fax (609) 258-1982

finance@princeton.edu

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Office of Research and Project Administration
WILL ITEM BE DELIVERED TO SPONSOR UPON COMPLETION?  ☐ YES  ☐ NO  IF YES, ENTER SPONSOR ADDRESS BELOW.

IMPORTANT NOTE: THIS ITEM CANNOT BE SHIPPED OUTSIDE OF THE U.S. UNTIL THIS FORM HAS BEEN SUBMITTED AND APPROVED BY YOUR ORPA ADMINISTRATOR

<table>
<thead>
<tr>
<th>SPONSOR NAME</th>
<th>CONTACT PERSON (IF APPLICABLE)</th>
</tr>
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<tbody>
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<tr>
<th>STREET</th>
<th>CITY/TOWN</th>
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<table>
<thead>
<tr>
<th>STATE/PROVINCE</th>
<th>ZIP/POSTAL CODE</th>
<th>COUNTRY</th>
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</table>

Section VI: To be completed by the Controller’s Office after item is completed

<table>
<thead>
<tr>
<th>ASSET TAG NUMBER</th>
<th>MASTER SERIAL NUMBER</th>
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</thead>
<tbody>
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</table>

Section VII: Signature required for item initiation and modification requests

To the best of my knowledge, this fabricated equipment item and/or modification thereof will result in a unique and discrete item which cannot be acquired off-the-shelf, has a useful life of more than one year, and is made of material and components which cumulatively cost $5,000 or more.

<table>
<thead>
<tr>
<th>PRINCIPAL INVESTIGATOR NAME</th>
<th>DATE</th>
<th>SIGNATURE</th>
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<tbody>
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</table>

<table>
<thead>
<tr>
<th>ORPA NAME</th>
<th>DATE</th>
<th>SIGNATURE</th>
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</tbody>
</table>

DISTRIBUTION:
Project File/PeopleSoft/OnBase, Chiz Walter, Requesting Department Administrator, Exports@princeton.edu, Controller’s Office
Once approved, ORPA will set up a new project to track expenses for the fabricated piece of equipment and issue a Notice of Award (NOA).

The Department submits Modification Requests via the Fabricated Equipment Request, Modification, and Completion Form to OPRA if/as necessary.

The Department submits the Completion Request via the Fabricated Equipment Request, Modification, and Completion Form to SRA.

SRA sends Fabricated Equipment Request, Modification, and Completion Form to the Controller’s Office for Asset Tag Number.

Controller’s Office sends the Asset Tag information to the Department.

Final Fabricated Equipment Request, Modification, and Completion Form is uploaded in the Prime Asset Management Module by the Office of the Controller.
Non-Funded Agreements...
Non-Funded Agreements...

What constitutes a non-funded agreement at Princeton?

- Non-disclosure/proprietary/confidentiality agreements
- Data Access/License agreements
- Memorandum of Understanding
- Facility access/use agreements
Non-Disclosure Agreements (NDA)

- A legally enforceable contract that creates a confidential relationship between the person with the “protected” information and the person with whom it will be shared.

- It is meant to protect sensitive information.

- It serves as a “road map” for information sharing.
Data Access/License Agreements

Data agreements are utilized when a person hosts a set of data that another person wishes to utilize.

They include terms:
- to define the data
- to describe the purpose of use (intended and allowable use)
- confidentiality requirements
- protection requirements
- access and governance
- reuse and termination
Memorandum of Understanding (MOU)

According to Quora.com, an MOU is defined as:

- A written legal document which completely describes the principles of an arrangement between the two or more parties forming a bilateral or multilateral agreement duly signed by the parties. It should clearly mention the terms of the agreement and is meant to define the intentions toward a common goal.
Facility Access/Use Agreement

- These agreements are utilized between an institution and an entity granting access to an institution’s facilities.

  - Wildlife parks
  - Laboratories
  - Clean rooms not on Princeton campus
How Are These Agreements Managed?

➤ All non-funded agreements need to be entered into Coeus.
  ➤ The should include a $0 budget (hence “non-funded”)
  ➤ Statement of work
  ➤ PI and co-PI certifications
  ➤ Agreement to be negotiated

➤ Standard PI eligibility rules apply

➤ ORPA will negotiate and execute these agreements
Questions?