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The Research Community Update informs campus administrators about research-related topics of interest and importance. Staff in the Office of Sponsored Programs are here to help you with navigating the changing and challenging world of research administration.

To unsubscribe, or to request that someone be added to this newsletter distribution list, please contact Ron Fleischmann, Associate Director of Pre-Award Administration (fleischm@uwm.edu).

This issue features:
- **What Compliance Tasks are Required... and When?**;
- **Cost-Share: Frequently Asked Questions Part III**;
- **Reminder: NIH Transitions to FORMS-D Application Packages Tomorrow!**; and
- **Professional Development Opportunity: Basics of Research Administration**.

### WHAT COMPLIANCE TASKS ARE REQUIRED... AND WHEN?

**What compliance tasks are required... and when?**

Specific compliance tasks, informed by federal regulations, state law, and UW System and UWM policy, are required at certain points during the proposal submission, award, continuation, and no-cost extension phases of a project. Additionally, the May 20th deadline has come and passed for researchers to complete their effort, training, and disclosure tasks in order to receive OSP services. To help researchers to comply with these requirements, the following process describes the tasks due at each OSP transaction:

#### At Proposal Submission:
- All senior/key persons in the proposal (PI, Co-PI, Co-Investigator, or other individual designated as senior/key person) must have completed their **Outside Activities Report (OAR)** during the last disclosure cycle (due annually by April 30).
- For submissions to the Public Health Service (PHS) and other non-federal agencies that subscribe to the PHS Financial Conflict of Interest [FCOI] regulations, a completed ** Significant Financial Interest Disclosure [SFID]** must be completed within the last 12 months.

#### At Award Stage:
- All **effort tasks** must be complete for all PIs, Co-PIs, Co-Investigators and other personnel included in the Notice of Grant Award (NoGA).
- All PIs, Co-PIs, Co-Investigators, and NoGA personnel must have completed **Effort Training**.
- An **OAR** must be on file for the last disclosure cycle (due annually by April 30) for the PI, Co-PI, Co-Investigators, other individuals designated as senior/key persons, and for any other personnel included in the Notice of Grant Award (NoGA).
- For awards from PHS agencies (and those that ascribe to their FCOI regulations), an **SFID** must be on file within the last 12 months for all PIs, Co-PIs, Co-Investigators, other individuals designed as senior/key persons, and NoGA personnel.
- For awards from PHS agencies (and those that ascribe to their FCOI regulations), all PIs, Co-PIs, Co-Investigators, other individuals designed as senior/key persons, and NoGA personnel must have completed **FCOI Training within the last four years**.

#### During Non-Competing Continuations and No-Cost Extensions:
- An **OAR** must be on file for the last disclosure cycle (due annually by April 30) for the PI, Co-PI, Co-Investigators, other individuals designated as senior/key persons, and for any other personnel included in the NoGA.
- For awards from PHS agencies (and those that ascribe to their FCOI regulations), an **SFID** must be on file within the last 12 months for all PIs, Co-PIs, Co-Investigators, other individuals designed as senior/key persons, and NoGA personnel.
• For awards from PHS agencies (and those that ascribe to their FCOI regulations), all PIs, Co-PIs, Co-Investigators, other individuals designed as senior/key persons, and NoGA personnel must have completed FCOI Training within the last four years.

It is important to note that the OSP transactional points listed above may be delayed if project personnel have not completed all compliance-related tasks.

How can delays be minimized? By contacting OSP early and often! Our staff have access to tools that can quickly verify if project personnel have completed all compliance-related tasks. If you are working with a researcher on a submission, notify your Pre-Award Specialist early about the planned proposal. We can verify that all project personnel have completed their compliance tasks so as to not delay proposal submission. The same holds true for new awards, non-competing continuations, and no-cost extensions: if you have planned actions on an award, contact our staff early and often to verify that all compliance-related tasks are complete.

COST-SHARE: FREQUENTLY ASKED QUESTIONS PART III

By Ron Fleischmann, Michelle Schoenecker, Ann Shiras, and Kari Whittenberger-Keith

The last edition of the Research Community Update highlighted the Office of Sponsored Program’s new Cost-Share Frequently Asked Questions webpage. This edition features additional questions that our Office receives on proposals involving cost-share.

Q: My grant award is less than my original budget request. Is the difference between the award and original proposal budget now considered cost-share?
A: No. If a sponsor awards less than requested in the budget, OSP will work with the PI and the sponsor to negotiate an appropriate reduction in the scope of work and/or develop a revised budget. If the original proposal included cost-sharing, the cost-share amount also should be reduced proportionally to align with the smaller award total and revised scope of work.

Q: Can I use award funds from one sponsored project to cost-share on another sponsored project?
A: No. Most federal and non-federal sponsors do not allow PIs to use their awards as cost-sharing towards another sponsored project. However, there are a few exceptions to this rule – please contact your Pre-Award Specialist.

Q: If a cost is an unallowable expense for budgeting purposes, could it then be used for cost-share purposes?
A: No. If a cost is unallowable for sponsor budgeting purposes, it cannot be counted towards cost-share commitments either. For example, alcoholic beverages are not allowed on federal grants. Since alcoholic beverages are not permitted on federal funds, a PI could not use cost-share funds to cover these costs and meet cost-share requirements.

Q: I am submitting a proposal to an agency that requires cost-share and allows indirect costs at the fully negotiated indirect cost rate. Do I calculate the indirect costs on both my project budget and the cost-share funds?
A: Yes. Indirect costs are real costs that UWM incurs in the administration of grants and contracts such as OSP services, library services, utilities, building depreciation, and other administrative functions. Thus, indirect costs must be calculated on cost-shared funds at the fully negotiated indirect cost rate.

Q: I am submitting a proposal to an agency that requires cost-share but does NOT allow indirect costs at the fully negotiated indirect cost rate (or does not allow indirect costs on the budget altogether). How should I include indirect costs in the project budget?
A: OSP typically recommends first calculating the “forgone indirect costs” as a method to meet the cost-share requirements – these are indirect costs that UWM is entitled to receive through its federally negotiated indirect cost rate agreement, but cannot as a result of the sponsor’s limitation on (or prohibition of) indirect costs. Since sponsor and program requirements vary, PIs should contact their Pre-Award Specialist to discuss whether forgone indirect costs may be included in the cost-share budget.

After determining the amount of forgone indirect costs on the cost-sharing, PIs and their department/division should determine how that amount can be used to meet the cost-share requirements and if additional cost-sharing is necessary.

Do you have a question about cost-share that is not included above or on the new Cost-Share FAQ website? Send it to Ron Fleischmann, Associate Director (fleischm@uwm.edu), and have it answered in an upcoming edition!
REMINDER: NIH TRANSITIONS TO FORMS-D APPLICATION PACKAGES TOMORROW!

As a reminder, the National Institutes of Health (NIH) will transition to FORMS-D application packages for proposals starting tomorrow, Wednesday, May 25, 2016. There are a number of changes to the FORMS-D application package over the FORMS-C packages, so please be certain to remind principal investigators to carefully review the new NIH Application Guides.

To assist the research community with NIH applications, OSP has three checklists available to support the development of New, Renewal, and Resubmission proposals that will use FORMS-D applications. All of these checklists (and a number of other resources) are available on our Forms and Downloads website.

PROFESSIONAL DEVELOPMENT OPPORTUNITY: BASICS OF RESEARCH ADMINISTRATION

New to the field of research administration? The Society of Research Administrators (SRA) International has a Basics of Research Administration professional development opportunity July 11-13, 2016 in Salt Lake City, Utah. The training program will cover identifying funding sources, pre-award administration, award acceptance, compliance, and post-award administration. Room reservations at the conference site will be available until June 17, 2016.