Agenda – Day Four

• Research Misconduct & Compliance
• Faculty Dairy Planning
• Compensation: Personal Services & Effort Reporting
• Office of Foundation Relations
• Corporate Engagement
• Conflict of Interest
• NUIT Administrative Systems

Introduction

Research Misconduct & Compliance
Michelle Stalilonis
Senior Compliance Specialist
Office for Research Integrity
m-stalilonis@northwestern.edu

What is Research Misconduct?

• Fabrication
• Falsification
• Plagiarism

Fabrication is making up data or results and recording or reporting them.

Falsification is manipulating research materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.

Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

To ask a question, receive guidance, or report a violation, contact a representative from the list below. All are trained and ready to help.

Falsification of Research Effort
Controller's Office
Mike Daniels, Director
Call: 847-491-4710 Email: m-daniels2@northwestern.edu

Grant Management
Office of Sponsored Research
Lynda Wolter, Executive Director
Call: 312-503-7955 Email: lynda.wolter@northwestern.edu

Office of Biomedical Research
Mike Daniels, Director
Call: 847-491-4710 Email: m-daniels2@northwestern.edu

Institutional Animal Care and Use Committee
Mandy Kozlowski, Director of IACUC
Call: 312-503-0109 Email: m-kozlowski@northwestern.edu

Institutional Review Board
Eileen Yates, MS, CIP, IRB Compliance Manager
Call: (312) 503-6011 Email: eyates@northwestern.edu

Research Misconduct
Office for Research Integrity
Lauran Qualkenbush, Director
Call: 312-503-0054 Email: nu-ori@northwestern.edu

Research on Human Subjects
Institutional Review Board
Eileen Yates, MS, CIP, IRB Compliance Manager
Call: (312) 503-6011 Email: eyates@northwestern.edu

Research on Animals
Institutional Animal Care and Use Committee
Mandy Kozlowski, Director of IACUC
Call: 312-503-0109 Email: m-kozlowski@northwestern.edu

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EthicsPoint: A Compliance Hotline

- Report potential misconduct or violations of policy:
  - (866) 294-3545
  - www.northwestern.edu/ethics
- Any suspected problems will be reviewed according to University procedures
- Policy prohibits retaliatory action against those reporting
- Anonymous

Compliance

Penalties for Non-compliance

Institutional:
- Fines and penalties
- Exceptional status
- Funding reduction

Personal:
- Termination
- Disciplinary action
- Criminal/civil sanctions
- Suspension and debarment
- Professional integrity compromised

Compliance

Institution Settlement

<table>
<thead>
<tr>
<th>Institution</th>
<th>Time Frame</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northwestern University</td>
<td>February 2003</td>
<td>$5.5 million penalty for overstating effort reporting on federal sponsored projects</td>
</tr>
<tr>
<td>University of Connecticut</td>
<td>January 2003</td>
<td>$2.5 million penalty for overstating anticipated expenses, overcharging the government, and billing for items not covered by grants, Cost sharing issues</td>
</tr>
<tr>
<td>Cornell University’s Weill Medical College</td>
<td>Fall 2007</td>
<td>$2.6 million settlement for a PI failing to disclose on grant applications to the NIH the full extent of various active research projects</td>
</tr>
<tr>
<td>Yale University</td>
<td>December 2008</td>
<td>$7.6 million settlement for inadequate documentation of cost transfers and summer salary charges wrongly charged to federal grants</td>
</tr>
<tr>
<td>Dartmouth College</td>
<td>October 2010</td>
<td>$275,000 settlement and $604,000 in contract funds returned to the government for contract pricing and cost recovery issues, lack of compliance with Federal Acquisition Regulation (FAR), and Conflict of Interest issues.</td>
</tr>
</tbody>
</table>

Recent Examples of the Impact of Noncompliance

Research Data: Ownership, Retention and Access

- University Policy:
  http://research.northwestern.edu/sites/research/files/policies/Research_Data.pdf
- Defines "research data"
- Defines University and PI responsibilities
- Transfer data when researcher leaves institution
- Data retained for a minimum of 3 years after the last financial report for the project has been submitted, unless longer periods are required

Compliance
How can you ensure compliance?

• We are all responsible
• Understand complex regulations
• Identify resources
• Know when and where to ask for help
• When in doubt, ask

Faculty Salary Planning
Deb Cundiff
Business Administrator
McCormick School of Engineering
Marsha McClellan
Director of Financial Management
Feinberg School of Medicine

What is Faculty Salary Planning?

a.k.a. Direct charging
Begins at the proposal stage
Faculty must estimate how much time they will spend on the project (effort)
Administrator uses effort to calculate the salary request from the sponsor
PI provides the scientific leadership supporting the research

What is Salary Planning?

• Salary charging must adhere to the 4 basic cost principles per OMB Circular A-21:
  - Reasonableness
  - Allowability
  - Allocability
  - Consistency

Principles & Policies

• The NIH Grants Policy Statement:
  Salary and wage amounts charged to grant-supported projects for personal services must be based on an adequate payroll distribution system that documents such distribution in accordance with applicable Federal Cost Principles and consistently applied institutional policy and practices.
Principles & Policies

- NSF limits salary compensation for senior project personnel to no more than two months of their regular salary in any one year. This limit includes salary compensation received from all NSF-funded grants. This effort must be documented in accordance with the applicable cost principles.

Key Principles

- Effort commitments should drive salary planning
- Cost sharing (including over the cap salary) must come from a non-sponsored source
- Identify cost sharing sources early
- Not all faculty activities come from extramural funding:
  - Instruction
  - Administration
  - Grant writing (usually)
- PIs should generally accept 100% funding from sponsored projects, unless there is a sponsor expectation

How is Salary Paid on the Evanston Campus?

- Tenure/tenure track faculty have 9 month academic year appointments
- May also have another appointment with a different contract period (e.g., 12 month)
- May receive up to 2.5 months of summer salary from sponsored projects
- Academic year: 9/16-6/15
- Summer period: 6/16-9/15
- Partial months of September & June will affect direct charge calculation
- Salary cap consideration

How is Salary Paid on the Chicago Campus?

- Clinical faculty (MDs) have 12 month appointments
- Most Ph.D./investigator/tenure eligible faculty have 12 month appointments except for a few that elected to remain with 9 month appointments or have joint appointments with an Evanston school
- Institutional base salary & effort includes both NU & NMG
- 12 month academic year: 9/1-8/31
- 9 month academic year: 9/1-5/31
- Summer Quarter: 6/1-8/31
- Salary cap
Cost Sharing

- Cost sharing occurs when a cost specifically benefits a sponsored project but is not charged to that project.

- Can be mandatory (salary or non-salary), over the cap cost sharing or voluntary committed cost sharing (salary and non-salary). Most common type of cost sharing on the Chicago campus & the NIH statutory cap and the salary limitation on NIH career (K) awards.

Cost Sharing Model Changes

- As of 9/1/13, cost sharing changed to a model that distinguishes mandatory vs. voluntary committed cost sharing with addition of 193 fund. Allows departments to more effectively manage the cash commitments associated with voluntary committed cost. These funds function as follows:

  191: Used exclusively for mandatory cost sharing (salary and non-salary). A budget is established on an annual basis.

  192: Used exclusively for over-the-cap cost sharing. No budget is established.

  193: Used exclusively for voluntary committed cost sharing (salary and non-salary). A budget is established on an annual basis.

NIH Salary Cap

- Some sponsors place limits on the amount of salary that can be charged to federal awards. For example:

  - NIH salary cap as of 1/8/17 is $187,000 or $15,583.33 per month for 12 month appointments
  - For 9 month appointments, the cap is $140,250

Research/Summer Quarter (Summer Salary)

- Research/Summer quarter payments are made using the Summer/Research Quarter Salary Request Form (not through deployment in FASIS).

Why is Direct Charging Important?

- Aligns salary expenses to effort commitments on sponsored projects
- Helps achieve compliance
- Utilizes available outside funding sources to cover salary expenses
- Supports all funds budgeting
- Reduces paperwork
- Increases accounting transparency
- Voluntary cost sharing occurs when committed salaries are not charged to awards; the effect is reducing the indirect cost rate
- Requires prospective planning of expense posting based on commitments

www.northwestern.edu/hr/payroll/administratorpayments.html
Why Faculty Might Not Direct Charge in Evanston Schools

- The base academic salary is guaranteed by the faculty member's Dean's Office
- Faculty might prefer to utilize the awarded research dollars for other charges to grants
- Some sponsors have salary caps
- Some limit salary charges to a specific number of months
- Some discourage academic year salary/benefit charges to grant budgets entirely
- It is critical to have an understanding of what each sponsor permits

In contrast, on the Chicago campus, all faculty direct charge their salaries

When Do We Direct Charge?

- The administrator and faculty member must work together to develop an annual plan at the beginning of the FY
- Make monthly adjustments as needed to reflect unanticipated activities
- Reduce compliance risks and save yourself transactional work if you complete direct charging before the 90 day period expires
- Retroactive salary adjustments more than 1 year after date of the initial charge will not be processed

Evanston Salary Planning Worksheet

- [www.northwestern.edu/coststudies/effort.html](http://www.northwestern.edu/coststudies/effort.html)

Note: Once on the above website, look under “References and Templates” and click “here” to log in with your NetID and password to access this worksheet

Chicago 12 Month Salary Template

- [www.northwestern.edu/coststudies/effort.html](http://www.northwestern.edu/coststudies/effort.html)

Note: Once on the above website, look under “References and Templates” and click “here” to log in with your NetID and password to access this worksheet
Faculty Salary Charging Quiz #1

• Prof. Marie Curie has an academic base salary of $90,000 and a 9-month appointment.
• Her earned rate is $10,000/month.
• She is paid over 12 months.
• What is her monthly pay rate (amount paid out in each paycheck)?

Answer: $7,500. Since the salary is paid over 12 months, only 75% of the earned rate is actually paid out in each paycheck.

Faculty Salary Charging Quiz #2

• Prof. Darwin has an academic base salary of $90,000 and a 9-month appointment.
• Prof. Darwin wants to charge 1 month of academic effort to his NSF grant.
• What is the total dollar amount of salary that will be charged to the grant?

Answer: $10,000. The effort is based on the earned rate (1/9) not the paid rate (1/12).

Faculty Salary Charging Quiz #3

• Dr. Oz has an FSM and NMG faculty appointment with an annual base salary on FSM of $50K and an annual base salary on NMG of $200,000. His total annual base salary is $250,000. In order to calculate effort and salary distribution, would we just use the FSM annual base salary or use both FSM and NMG annual base salaries?
• He has two NIH grants, with effort at 20% on one and 10% on another. Would we have to cost share on these grants or not?

Answer: 1.) We would use the IBS, both FSM and NMG
2.) Yes, his IBS is greater than the NIH's salary cap of $187,000.

What are your next steps?

• Once you have determined that you will be involved with direct charging faculty salary to sponsored projects, you will need to:
  - Take the FASIS training classes that give you access to the system
  - Download the salary planning worksheet and/or the SDA form
  - Consult with your deans office or the Office for Research in the medical school library/finance for further guidance, training, or resources

ffra.northwestern.edu

Forms: Where Do You Get Them?

• Summer Salary Forms
  - www.northwestern.edu/hr/payroll/administratorpayments.html
• SDA Forms
  - www.northwestern.edu/hr/payroll/administratorpayments.html
• Salary planning wkst & Academic Base Salary wkst
  - www.northwestern.edu/coststudies/effort.html

Note: Once on the above website, look under “References and Templates” and click “here” to log in with your NetID and password to access this worksheet.

Questions?

Chicago:
Mania McClellan
Director of Financial Management, Feinberg
m-mcclellan@northwestern.edu

Evanston:
Deb Cundiff
Business Administrator
McCormick School of Engineering
deb@northwestern.edu
Compensation: Personal Services and Effort Reporting

Why Effort Reporting?

2 CFR PART 200 – Uniform Guidance

Standards for Documentation

Compensation for Personal Services

- Cost Studies Personnel
  - Operational Support (Effort Reporting System) and Compliance Monitoring
    - Jennifer Mitchell (Oversees Effort Reporting, 7-2473)
    - Tina Mete (Evanston Effort Coordinator, 1-6755)
    - Erin Farlow (Chicago Effort Coordinator, 3-0323)

http://www.northwestern.edu/coststudies/effort.html

Why Effort Reporting?

- Effort Reporting is the approach NU utilizes to fulfill the regulations in 2 CFR Part 200 (Uniform Guidance), Section 430: Compensation – Personal Services – Labor represents ~ 75% of direct research costs

2 CFR PART 200

- Effective in December, 2014
- Significant updates on Effort Reporting
  - 3 Examples removed (less prescriptive)
  - Internal Costs (200.303) emphasized
  - Written policies/procedures emphasized
  - Institutional Base Salary (85) emphasized

Download
http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

Standards for Documentation

- Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed
- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated
- Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities
Internal Controls

§ 200.303 Internal Controls
- Must maintain effective internal controls over federal award that provides reasonable assurance...
- Should be in compliance with COSO and Standards for Internal Control in the Federal Government (the “Green Book”).
- Must comply, evaluate and monitor compliance with legal statutes, regulations and the terms and conditions of the federal awards
- Must take prompt action when non-compliance is identified
- Must take reasonable measures to safeguard personally identifiable information and other information designated as sensitive

Is our current Effort Reporting System sufficient for Internal Controls?

Effort Reporting Verify?

- Appropriate Salary Rate utilized according to appointment(s), which defines IBS
- Appropriate salary/wage charged to sponsored programs (paid effort)
- Cost Sharing performed as promised
  - Mandated Cost Share (required by sponsor)
  - Voluntary Committed Cost Share (proposed on award budget)
- Salary over the cap cost funded by non-sponsored funds
  - Appropriate NIH salary cap utilized
- Research effort limited for NIH career awards

Who Needs to Certify Effort?

Any person paid (or with a commitment) on a sponsored award must certify that the salary paid (or the commitment) is reasonable in relation to the effort (activity) devoted to the award.

Risks of Non-compliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Date</th>
<th>Issue</th>
<th>Settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northwestern</td>
<td>2004 NIH</td>
<td>Institutional base salary, K award, Certifier Assignment</td>
<td>$1.5 million</td>
</tr>
<tr>
<td>Johns Hopkins University</td>
<td>Feb 2004 NIH</td>
<td>Faculty time &amp; effort overstated</td>
<td>$2.6 million</td>
</tr>
<tr>
<td>Harvard University</td>
<td>July 2004 NIH</td>
<td>Government billed for salaries &amp; expenses unrelated to federal grants, self reported</td>
<td>$3.3 million</td>
</tr>
<tr>
<td>Florida International University</td>
<td>Feb 2005 Dept of Energy</td>
<td>Effort reporting, cost transfers, payroll dist.</td>
<td>$11.5 million</td>
</tr>
<tr>
<td>University of Alabama at Birmingham</td>
<td>Apr 2005 NIH</td>
<td>Research work overstated, Medicare billed for research</td>
<td>$3.9 million</td>
</tr>
<tr>
<td>The Mayo Clinic</td>
<td>May 2005 NIH, others</td>
<td>Cost allocation, cost transfers, inadequate accounting system</td>
<td>$6.5 million</td>
</tr>
<tr>
<td>St. Louis University</td>
<td>June 2005 NIH, CDC, HUD</td>
<td>Supplemental compensation, effort reporting</td>
<td>$1 million</td>
</tr>
<tr>
<td>Yale University</td>
<td>Dec 2006 Multiple agencies</td>
<td>Cost transfers, summer salary charges, effort reporting</td>
<td>$7.6 million</td>
</tr>
<tr>
<td>Duke University</td>
<td>Jan 2008 NIH</td>
<td>Direct charging of administrative and clinical costs</td>
<td>Final settlement recommended by the auditor</td>
</tr>
</tbody>
</table>

Life Cycle of Effort Reporting – an ongoing process...

Pre-Award
- Appointing faculty & staff
  - Employment terms established: # months (contract period), % full-time, base salary

Preparing Proposal Budget
- Effort proposed, commitment made to the sponsor
- Payroll charged, consistent with activity to grant budget or cost-sharing account

Charging Salary
- Salary charged, consistent with activity to grant budget or cost-sharing account

Certifying Effort
- Effort attested, after activity occurred

Account Close-out
- Validation of certified effort against salary charges
- ADRP invoices and charges to expenses & sends FSR
- Award Close-out
  - Award awarded after x months
  - Preparing proposal budget
  - Submitting more Proposals
  - Award offered
  - Near end of project
  - Certifying effort
  - Final settlement recommended by the auditor

Effort Reporting Phases

Pre-Award
- Preparing the Proposal Budget
- Charging salary
- Certifying effort

Post-Award
- Account close-out
- Preparing the Proposal Budget
- Charging salary
- Certifying effort
- Account close-out
Key Principles of Effort Reporting

- Effort must be certified based on the actual work performed
- If the certified effort is less than the salary charged and cost shared to the grant for that quarter, the overcharged portion must be removed.

Effort Confirmation - Per Reporting Period

<table>
<thead>
<tr>
<th>Payroll %</th>
<th>Effort %</th>
</tr>
</thead>
</table>

Payroll Exceeds Effort - Per Reporting Period

- Payroll exceeds Effort after the Certifier attested his/her Effort expended on the project for the reported period

Effort Exceeds Payroll - Per Reporting Period

- Effort exceeds Payroll after the Certifier attested his/her Effort expended on the project for the reported period

Example of Effort Report

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Effort</th>
<th>Payroll</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Doe</td>
<td>Professor</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>

Effort Reporting: Key Concepts

- 100% Effort ≠ 40 ≠ 50 ≠ 60 hours per week
- Institutional Base Salary (IBS):
  - Annual compensation paid by an organization for an employee's appointments, whether that individual's time is spent on research, teaching, patient care, or other activities. Base salary excludes any income that an individual is permitted to earn outside of duties for the applicant/grantee organization

  - Salary increase NOT based on receiving new sponsored funding
  - Changes of responsibilities, merit increase, etc.
Effort Reporting: Key Concepts

Cost Transfers
Commitment

Faculty members and senior researchers must commit some effort to the sponsored project within the fiscal period, unless specifically exempted by the sponsor.

Effort Reporting: Key Concepts

- Consistency of reporting effort:
  - Progress reports
  - Current pending & support pages
  - Effort reports
  - Financial status reports
- NIH Salary cap and career award cap
  - Difference is funded by a non-sponsored source

Effort Reporting at NU

When to Report Effort:
- Effort reported quarterly
- Effort reports should be certified within 4 weeks after they are available for certification

Escalation Timeline:

<table>
<thead>
<tr>
<th>Estimated Timeline</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Week 0</td>
<td>Effort reports generated by internal administration (2 weeks after end of quarter) - notification sent to PI before submission with the deadline completion.</td>
</tr>
<tr>
<td>Week 1</td>
<td>Effort reports due to PI (10 days after generation)</td>
</tr>
<tr>
<td>Week 2</td>
<td>3rd party completion and submission to Department Chair</td>
</tr>
<tr>
<td>Week 3</td>
<td>2nd review - completion milestone to Department Chair</td>
</tr>
<tr>
<td>Week 4</td>
<td>1st review - completion milestone to Department Chair</td>
</tr>
<tr>
<td>Week 5</td>
<td>2nd peer review and evaluation - completion milestone to Department Chair</td>
</tr>
<tr>
<td>Week 6</td>
<td>Effort reports sent to administration</td>
</tr>
</tbody>
</table>

Effort Reporting System (ERS)

https://ers.northwestern.edu

Effort Reporting Training Sessions

- Effort 101 Hands-on (Quarterly)
- Effort & Payroll Open Lab (Monthly)
- Faculty Effort Reporting (by Request)
- Brown Bag Sessions
- One-on-One Assistance
Related Courses Recommended in the Following Order

- Research Administration Training Seminar offered by the Office for Research Integrity (contact ORI to register)
- Effort 101 (contact your Effort Coordinator to register)
- myHR
  - HRD 101: myHR Data Lookup
  - HRD 102: Deployed Funding
  - HRD 103: Time Administration
- Finance Facilities and Research Administration (FFRA)
  - FMS 505: Managing Sponsored Projects
- Sign up for myHR & FFRA courses via myHR Self Service
  - myHR Self Service
  - Learning
  - Request Training Enrollment
  - Search by Course Number

myHR: http://www.northwestern.edu/myhr/index.html

APPENDICES

10 Effort Reporting Policies

Policy Area #1: The basis for estimating effort percentages and calculating salary requests

Basis for 100% effort = Activities related to NU appointment

Consulting and outside, professional activities, are excluded from the basis for 100% effort

Policy Area #2: Expectation for Faculty Effort in Proposals

Faculty are expected to commit some level of effort (>0%) on proposals on which they are listed as principal investigator (PI) or key personnel, with exceptions for certain types of proposals.
Policy Area #3: Voluntary Cost Sharing

Northwestern University does not typically cost share on a voluntary basis. Voluntary cost sharing commitments are to be made only where the competitive forces and perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant it.

Policy Area #4: Expectations for Extramural Funding of Faculty Academic Year Salary

If faculty expect to expend effort on sponsored projects during the academic year, a proportionate amount of academic year faculty salary should be requested from sponsors (to the extent that this is consistent with agency practice).

Policy Area #5: Reduction of effort when award reduced from proposal

When an awarded budget reflects a reduction from the proposed budget, an evaluation by the PI must occur to determine the effect on the effort commitments.

Policy Area #6: Prospective Establishment of Salary on Sponsored Project/ Cost Sharing Accounts

Salary distribution should begin on sponsored projects and/or cost sharing accounts as soon as the project is awarded, and concurrently with actual project effort.

Policy Area #7: Summer Effort and Salary

Effort certification for the period beyond the appointment should only reflect the activity for which the faculty member is responsible and earning salary in that period. For most faculty, this represents effort and salary on sponsored projects only.

Policy Area #8: Retroactive Salary Adjustments

- Highly discouraged for periods for which effort has already been certified
- Charges to the sponsored accounts should not be higher than the certified effort
- Journal applicable dates must correspond to the intended original transaction
- Retroactive adjustments >90 days past the date of the initial charge require a detailed explanation by the PI
- Retroactive salary adjustments seeking to place costs on sponsored projects will not be processed if the requested adjustment > 1 year after the date of the initial charge
Policy Area #9: Faculty Certification of Effort Reports

Faculty are required to certify (sign) their own effort reports, and also are required to certify the effort reports of the research staff working on their sponsored projects (graduate students, post doctoral fellows, and other similar persons).

Policy Area #10: Training for faculty and administrators on effort reporting

All faculty and staff involved in effort reporting are expected to receive appropriate levels of effort reporting training.

Office of Foundation Relations

Susan Fisher Miller
Senior Associate Director
susanfmiller@northwestern.edu

Sarah Fodor
Executive Director, Foundation Relations & Corporate Engagement

Office of Foundation Relations

Heidi Jurgens
Senior Associate Director

Susan Dauber
Senior Associate Director

Maureen Scherrer
Assistant Director

The Office of Foundation Relations (OFR) is Northwestern University’s central office supporting faculty and staff who seek funding from private professional foundations. OFR manages relationships with foundations to advance University goals and priorities.

Private Foundations & Why They Give

- Private foundations are mission-driven grant-making organizations that support exceptional projects and initiatives that address specific societal problems and benefit the larger community.
- These national, professionally staffed foundations typically do not provide funding for core University needs.
- At Northwestern, foundation grants average $200,000.
  - “An institution is the lengthened shadow of one man.” – R.W. Emerson
  - “You’ve seen one foundation, you’ve seen one foundation.”
FY2017 Private Foundation Funding

- $59.6M in foundation commitments to Northwestern
- 311 proposals requesting a total of $193.9M
- 148 proposals awarded
- Top grant: $5M
- Assistance to every Northwestern School

OFR Services

- Coordinate strategic approaches to foundations
- Research foundations to identify potential funding
- Review proposals to craft persuasive arguments
- Provide materials for submissions (IRS documents, financial statements, etc.)
- Partner with campus leaders and research administrators
- Track proposals and submissions in development database
- Facilitate grant reporting
- OFR workshops on foundation grantseeking

Finding Private Foundation Funding

- RFP Listing on OFR Website:
  [http://www.northwestern.edu/foundationrelations/finding-funders/request-for-proposals.html](http://www.northwestern.edu/foundationrelations/finding-funders/request-for-proposals.html)
- Databases:
  - Foundation Directory Online
  - Pivot (Community of Science)
  - Scimago
  [http://www.northwestern.edu/foundationrelations/finding-funders/index.html](http://www.northwestern.edu/foundationrelations/finding-funders/index.html)
- Before contacting organizations listed in these databases, please contact OFR for advice and clearance
  - Restricted Foundations
  [http://www.northwestern.edu/foundationrelations/finding-funders/restricted-foundations.html](http://www.northwestern.edu/foundationrelations/finding-funders/restricted-foundations.html)

Contact OFR

Please contact our office with any questions you may have about private foundations or whenever a faculty member you are working with is interested in seeking foundation funding.

- Michelle Melin-Rogovin, Senior Associate Director
- Foundation Relations
- Feinberg School of Medicine
- 312-503-7072
- foundationrelations@northwestern.edu

OFR

Feinberg School of Medicine
Foundation Relations

Michelle Melin-Rogovin, Senior Associate Director
Foundation Relations
Feinberg School of Medicine
312-503-7072
foundationrelations@northwestern.edu
FSM Foundation Relations Office

**Funding Opportunity Analysis**
- Analyze RFP, grants & ID candidates
- Meet with investigator to identify key funding opportunities
- Draft workplan for campus & funder outreach

**Research & Guidance**
- Research foundation's to provide best input on fit for funding ideas
- Liaise with RA, division offices to ensure smooth coordination
- Can assist PI with communication strategy, letter to answer questions during application process

**Communication & Outreach**
- Analyze RFP requirements & deadlines with RA & PI
- Will need to provide detailed outline & comments for PI
- Participate in site visits
- Proactively interacts with various associations

**Editing & Proofreading**
- Assist with writing and review of progress report
- Participate in site visits
- Proactively interacts with various associations

**Progress Reports & Visits**
- Assist with writing and review of progress report
- Participate in site visits
- Proactively interacts with various associations

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Corporate Engagement

Emma Walsh – Program Assistant II

Northwestern

Corporate Engagement | What We Do

- **Find & Meet Industry Contacts**
  - Help faculty and staff find and meet industry contacts in R&D, tech scouting, corporate foundations, university relations and more

- **Background Information**
  - Provide background information on current relationships between companies and the entire university

- **Proposals**
  - Review proposals and supporting correspondence to formal and informal corporate grant-makers

- **Campus Visits**
  - Administer scheduling, space and provisions for campus visits by corporations

Corporate Engagement | Who We Are

- **Executive Education**
  - Medill, Pritzker, SOC, SESP, Athletics

- **Economic Development**
  - Tim Angell - Sr. Assc. Dtr.
  - Jim Bray - Director
  - Sheila Kessler - Assc. Dtr.
  - Farley, FSM, SQI, CLP, Library, Student Groups

- **Career Services**
  - Kara Moore - Assc. Dtr.
  - The Garage, Segal, DFA, ISEN, Kellogg, WCAS, NUTC

- **Sponsored Programs**
  - Emma Walsh - Program Assistant II
  - The Garage, Segal, DFA, ISEN, Kellogg, WCAS, NUTC

- **INVO**
  - Kate Rice - Sr. Assc. Dtr.
Corporate Engagement | Who We Are

- Independent from:
  - McCormick Corporate Relations
  - Feinberg Corporate Relations
  - Kellogg Corporate Partnerships
  - Pritzker External Partnerships

Corporate Engagement | Pre-Award

- Identify Industry Funding Opportunities
- If Research Funding – we work with ORD
- If Program Funding – we send to all relevant parties

Corporate Engagement | Post-Award

- Appropriate accounting for grants, awards, gifts
  - Checks, Wire Transfers, In-kind
  - Gifts Grant
  - Coordination with OSR, OGC, ASRSP

- Relationship Management
  - Share appropriate information
  - Find new corporate connections for PI and Admin

Corporate Engagement | Dashboards

Dashboard Highlights:
- Metrics
- Philanthropy
- R&D Snapshot
- Key Leaders & Alumni
- Recruiting
- Recent Involvement
- Company Profile

Corporate Engagement | Relationship Management & Cultivation

Alignment: Let’s Go Places Together

Northwestern Strengths
- Multidimensional & Adaptive
- Powerful Collaborations
- Pioneering Innovation
- Meaningful Impact

Toyota Smart Mobility
- Interactive Intelligence
- Vehicle Enhancement
- Vehicle Connected
- In Bridge Lane

What We Do: Examples of Highlighting NU Strengths & Faculty Research

Examples of Highlighting NU Strengths & Faculty Research
Northwestern | Multidimensional and Adaptive

**ISEN** INSTITUTE FOR SUSTAINABILITY AND ENERGY OF NORTHWESTERN

- Advancing global sustainability and energy solutions through transformative research, interdisciplinary education and public engagement
- Dozens of affiliated faculty from 5 different schools across the University
- Partnerships with several companies, active participation on executive council

Research areas:
- Creating sustainable cities and managing the risks of climate change
- Solar energy and fuels
- Catalysis and sustainable materials
- Nanotechnology for environmental remediation

Partnering with You

Corporate Engagement | Next Steps

- Reach out to brainstorm companies or gather tablo corporate campus information
- Update NU Scholars with PI information
- Sign up for the Foundation Relations & Corporate Engagement RFP newsletter

Corporate Funding Opportunities

Thank You & Questions

Networking/Break

Conflict of Interest/Commitment

Conflict of Interest Office (NUCOI)
Kate Booth
Senior Compliance Specialist
Defining a Conflict of Interest

A situation where an individual's external financial interests may bias or compromise — or appear to bias or compromise — an individual's judgment, objectivity, or decision-making in research.

How Do We Handle COIs?

- Disclosure of external interests and relationships
- Review of interests and research to identify COIs
- Elimination, reduction, or management of COIs
- Monitoring compliance with management strategies

Applicable Policies

Northwestern has three policies:
- Policy on Conflict of Interest and Conflict of Commitment
- Conflict of Interest in Research
- Institutional Conflict of Interest in Research

COI & COC at Northwestern

3 Disclosure Types:
- Annual Faculty Disclosure – completed once/year in February by faculty in eDisclosure
- Annual Staff Disclosure – completed once/year in February by staff in eDisclosure
- Research Disclosure – completed prior to engaging in research subject to Northwestern’s policy and on an ongoing basis

Researchers can meet research-related requirements simultaneously with annual disclosure requirements during the annual disclosure process each February. If no new interests/relationships arise during the year, annual disclosure alone is sufficient. If new interests/relationships arise outside of the annual disclosure process, researchers must update their disclosure within 30 days.

What Does a COI Look Like?

Not every disclosed interest/relationship is a COI

Examples of apparent or actual COIs related to research:
- Extensive consulting or other relationship with, or equity interest in, an entity sponsoring research
- Intellectual property rights for product being tested in research
- Use of students/support staff/university resources on external activities
- University dealings with entities with which a personal relationship exists

Why Are We Concerned About COI?

1. To protect the objectivity, credibility, and trustworthiness of research, our research community (i.e., YOU), and our institution
2. To meet regulations that require the University to have policies and procedures for soliciting disclosure, review, and management of COIs
COI Regulatory Environment

Applicability of Northwestern’s COI in Research Policy:

- All federally-sponsored research
  - PHS, NSF, DOD, DOE, DOJ, etc.
- All industry-sponsored research
- All human subjects research, regardless of funding source
- Agencies that have adopted PHS COI regulations:
  - AHA, PCORI, Susan G. Komen, etc.
- Other sponsors with specific COI requirements

http://www.northwestern.edu/coi/policy/coi_by_sponsor.pdf

Important Terms

Investigator

Any individual acting as project director or principal investigator

AND

Any other person, regardless of position or title, who is independently responsible for the design, conduct, or reporting of research

Role on Project/Proposal Record

<table>
<thead>
<tr>
<th>Role on Project/Proposal Record</th>
<th>Investigator?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Key Personnel</td>
<td>YES - ALWAYS</td>
</tr>
<tr>
<td>Consultant</td>
<td></td>
</tr>
<tr>
<td>Other Significant Contributor</td>
<td></td>
</tr>
<tr>
<td>Research Coordinator</td>
<td></td>
</tr>
<tr>
<td>Graduate Student / Postdoc</td>
<td></td>
</tr>
</tbody>
</table>

Whether someone is an investigator is not related to their effort!

For example:

The mentor of a graduate student or postdoc on a fellowship may have 0% effort because they are advisory, and may only meet with the trainee quarterly.

Do they significantly contribute to the design, conduct, or reporting of research? **YES**.
Important Terms

**Institutional Responsibilities**

- Any activity that is relevant to what you do at Northwestern. Common related activities include:
  - Editing, Scientific Advisory Board, Consulting, Teaching
- Things that are likely not related to an Investigator's institutional responsibilities:
  - Retirement funds, Community Involvement (church groups, PTA service), etc.

**Institutional Responsibilities**

- Example: Your family owns a pizzeria. Disclose or not? Does it relate to your teaching, research, or clinical responsibilities?
  - "Getting a bigger piece of the pie: Capturing a larger slice of a crowded market"
  - Taste research on a secret formula that could be commercialized by your family's restaurant
  - Research on the health benefits of a gluten-free crust that your restaurant uses

**Significant Financial Interest (SFI)**

An external financial interest for an Investigator and their Immediate Family Member, when aggregated for the 12 months preceding the disclosure date, from a single entity, consisting of one or more of the specific interests in the definition

SFIs include (see Appendix slides for full definition):

- Any equity in a non-publicly traded company
- Payment, reimbursed travel, equity in a publicly traded company†, or IP licensed outside of Northwestern valued at / exceeding $5,000

*Excluding federal, state, or local government agencies, US institutions of higher education, academic teaching hospitals, medical centers affiliated with an institution of higher education
†Excluding retirement accounts and mutual funds

**Financial Conflict of Interest (FCOI)**

An SFI that could directly or significantly affect the design, conduct, or reporting of research

**Where To Disclose**

Log-in link:

https://coi.northwestern.edu
Northwestern's Process

Investigator names are entered into InfoEd in Personnel Section.
Investigator names are fed into eDisclosure every 20 minutes.

Compliance Checkpoint: Before submitting the grant, ALL investigators must have disclosed within the last year (365 days) and completed training within the last four years.

Compliance Checkpoint: Before opening the chartstring, ALL Investigators must have a status of “Review Complete”.

Key Compliance Points (Initial)

- Disclose SFIs
- Complete COI training

NUCOI & School Deans
- FCOI determination made
- FCOI managed, as applicable
- FCOI reported, as applicable

OSR, ARS, & Departments
- Funding Released

Tools for Meeting Compliance Points

- COI Compliance Page in eDisclosure

- FDP Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_070596

A Note on Prespending

- Prior to drawing funds from the sponsor, a final COI determination must be on record for each investigator named on the project. Prespending accounts can be opened prior to a final COI determination being made (i.e., when the COI review process is still underway).

- Although prespending accounts can be opened before a final COI determination is reflected in eDisclosure, please note that each investigator must have compliant training and disclosure dates on file prior to prespending accounts being opened.

Key Compliance Points (Ongoing)

- Disclose new SFIs within 30 days
- Disclose SFIs annually
- All Staff & Faculty Investigators can do this during the Annual Disclosure process
- Complete COI training before engaging in research and every 4 years (or more frequently if required)
Roles & Responsibilities

Investigators
- Disclose financial interests related to their institutional responsibilities
- (PI) Identify all individuals who are Investigators on projects

RAs / OSR
- Verify compliance of disclosure & training dates prior to proposal submission / project initiation
- Assist in identifying all Investigators on a project

NUCOI
- Review disclosed interests relative to research projects
- Work to manage, reduce or eliminate conflicts
- Report to sponsors, as needed
- Assist all other parties

School Deans / Committees
- Review cases referred by NUCOI
- Assist in managing, reducing or eliminating conflicts for faculty and the institution

COI Resources
- Policy on Conflict of Interest and Conflict of Commitment:
- Policy on Conflict of Interest in Research:
- Northwestern's Conflict of Interest Office:
  - http://www.northwestern.edu/coi/index.html
- FDP Clearinghouse:
  - http://sites.nationalacademies.org/PGA/fdp/PGA_070596

Questions?
Northwestern Conflict of Interest Office (NUCOI)
nucoi@northwestern.edu / 847.467.4515
Kate Cosgrove Booth – Sr. Compliance Specialist
k-cosgrove@northwestern.edu / 847.491.4163
Garth Huskey – Compliance Analyst
garth.huskey@northwestern.edu / 847.467.6050
Paula Foster – Program Assistant
p-foster@northwestern.edu / 847.467.4515

Significant Financial Interest
- Compensation and/or payments (e.g., salary, consulting, advisory, and/or teaching fees, patents/royalties, gifts, and honoraria) exceeding $5,000*
- Equity interests (e.g., stock, stock options, or other ownership interests) in a publicly-traded entity for which the value exceeds $5,000
- Any equity interests (e.g., stock, stock options, or other ownership interests) in a non-publicly-traded entity
- Intellectual property rights and interests exceeding $5,000 (e.g., patents, copyrights), upon receipt of income related to such rights and interests
- Reimbursed or sponsored travel exceeding $5,000*

*FSM has a $0 value disclosure threshold.

Exclusions to SFI
- Compensation less than $5,000 (less FSM)
- Any compensation received for lectures, seminars, back-up engagements, honorariums, or service on advisory committees or review panels
- Employment or affiliation with a for-profit entity, a research institute that is affiliated with an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education, and compensation received from Northwestern funds
Exclusions to SFI

- Sponsored/reimbursed travel less than $5,000 (unless FSM)
- Travel reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education
- Intellectual property interests valued at less than $5,000 (unless FSM)
- Royalties received from Northwestern funds
- Unlicensed intellectual property that does not generate income
- Interests in publicly-traded entities valued at less than $5,000, as well as equity interests in any entity through personal retirement accounts and mutual funds

What are IT Administrative Systems?

- NUFinancials, InfoEd, Cognos, MyHR, iBuyNU, NUplans, and FAMIS
  - Customized to interface with each other.
  - Customized to Northwestern’s business processes.
  - Supported by IT teams.

InfoEd Proposal Development!

What is InfoEd PD?

- A shared-access system for preparing, approving and submitting all proposals.
- System-to-system data exchange between the local system and other systems, such as Grants.gov proposals.
- Became mandatory as of April 1, 2012.

Develop Proposals and Manage Sponsored Projects with InfoEd, NUFinancials and Cognos

Virginia Robbins
Senior Training Specialist-Team Lead
Northwestern IT
v-robbins@northwestern.edu
http://www.northwestern.edu/admin-systems/
Cognos
- Reports on InfoEd and NUFinancials data

Sponsored Research Stages!
- Proposal Submission
- Preaward
- Award Setup
- Spend/monitor expenses on award budget
- Finalize, correct, submit

What classes should I take?
Grant-related
- FMS502 InfoEd Proposal Development
- FMS503 InfoEd Approvals (online)
- FMS504 Reports in Sponsored Research (online)
- FMS505 Managing Sponsored Projects
- FMS507 Clinical Trials Proposals in InfoEd

Recommended Grants Training Plan!
You can register for classes in myHR Learn!

What other classes should I take?
Introductory
- FMS801 Expense Reports
- FMS802 Payment Requests
- FMS812 Run and Schedule Reports
- FMS803 Requests Basic Topics
- FMS801 Sourcing in BuyNU

Intermediate
- FMS711 Actual Journals
- FMS722 NUFinancials Budget Searches

Advanced
- FMS815 Requesters Advanced Topics

Anymore? I love classes!
Online:
- FMS804 Approvals and Workflow
- FMS720 NUFinancials Budget Adjustments
- FMS816 Receipts
- FMS900 FAMIS Service Requests
- NUtax
- Budgeting and Forecasting classes
- myHR
- HRS101 myHR Lookup
- HRS102 myHR Depayment Funding
- HRS1401 Postbox Data/Appointment Forms
- Effort Reporting

Your Education Action Plan!
(learning comes in many forms)
1. Take some classes!
2. Join NURAP!
3. Join listservs for OSR, ASRSP, NURAP, Financial Operations!
4. Network!

http://www.it.northwestern.edu/admin-systems/training/financial/getting-started.html
http://www.it.northwestern.edu/admin-systems/training/financial/sequence.html

Come see us soon!
Networking

CHECK YOUR KNOWLEDGE

Who does the review, approval, submission and processing of your funding proposals?

a. ASRSP  
b. Research Safety  
c. OSR  
d. Vice President for Research  
e. All of the above

OSR

What system do you use to develop your proposals?

a. Cognos  
b. InfoEd/Proposal Development  
c. eNotis  
d. Kronos

InfoEd/Proposal Development

True or False: A research administrator/coordinator must certify effort for their PI every quarter.

False

Certifiers (PI's, Faculty, etc.) must certify to reflect:

a. Budget  
b. Payroll  
c. Actual work performed  
d. Anticipated time worked

Actual work performed
Which office is responsible for the housing, welfare and veterinary care of laboratory animals?

a. Institutional Review Board office
b. Institutional Animal Care and Use Committee Office
c. Center for Comparative Medicine
d. Research Safety Center

Center for Comparative Medicine

A PI's effort that is not required by sponsors but is offered by the PI in a proposal is:

a. Voluntary Uncommitted Cost Sharing
b. Mandatory Cost Sharing
c. Optional Cost Sharing
d. Voluntary Committed Cost Sharing

Voluntary Committed Cost Sharing

When time devoted to external activities potentially has an adverse effect on capacity to meet University responsibilities this is an example of:

a. Misconduct
b. Conflict of Commitment
c. A lack of integrity
d. Conflict of Interest

Conflict of Commitment

What does not need to be done by the PI during the award close-out process?

a. File technical report
b. File effort report
c. Obtain a chart string
d. Review and certify final project budget statement

Obtain a chart string

Essential project equipment is considered which of the following?

a. Indirect cost
b. F&A
c. Direct cost
d. A nice bonus

Direct Cost

What are the four guiding principles that help determine whether direct and indirect costs can be charged to a sponsored agreement?

Reasonable
Allowable
Allocable
Consistent
The Seminar is Complete!

Thank you for completing the Research Administration Training Seminar! I will be emailing a brief survey regarding day 4 of this training. Please take a few minutes to fill it out as we are always looking for suggestions for improvement.

If you have any questions or concerns, please do not hesitate to contact me.