Agenda – Day Two

- Data Security
- Northwestern University Research Administration Professionals (NURAP)
- Research Safety
- Cost Principles for Sponsored Project Administration
- Facilities & Administrative Rate
- Cost Sharing
- Cost Transfers
- Program Income/Service Centers
- Core Facilities
Information & Systems Security/Compliance
Feinberg School of Medicine
Overview

• Information = Asset
• Threat Landscape
• Security Basics
• Policy Updates
Information = Asset

<table>
<thead>
<tr>
<th>Category</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Budgets</td>
<td>Invoices, receipts, payments, planning, forecasting</td>
</tr>
<tr>
<td>HR Data</td>
<td>Compensation, pension, benefits, performance</td>
</tr>
<tr>
<td>Contracts</td>
<td>Terms &amp; conditions, nondisclosure, service agreements</td>
</tr>
<tr>
<td>Research</td>
<td>IP, patents, consent agreements, patient records</td>
</tr>
<tr>
<td>Personal</td>
<td>SSNs, credit cards, DoB, medical/health records, certificates</td>
</tr>
<tr>
<td>Professional</td>
<td>Accomplishments, CV, degrees, awards, reputation</td>
</tr>
</tbody>
</table>

“If it’s worth collecting, it’s worth protecting”
## Higher Education Incident Experience (examples)

<table>
<thead>
<tr>
<th>Date</th>
<th>Institution Description</th>
<th>Source</th>
<th>Affected Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nov '16</td>
<td>Michigan State University</td>
<td>Unknown source</td>
<td>400K records</td>
</tr>
<tr>
<td>Jul '15</td>
<td>Harvard University (8 colleges)</td>
<td>Unknown source</td>
<td>Unknown affected</td>
</tr>
<tr>
<td>May '15</td>
<td>Pennsylvania State (Engineering)</td>
<td>China</td>
<td>18K affected</td>
</tr>
<tr>
<td>Jul '14</td>
<td>University of Illinois Chicago</td>
<td>Unknown source</td>
<td>Unknown affected</td>
</tr>
<tr>
<td>Mar '14</td>
<td>University of Wisconsin Parkside</td>
<td>Unknown source</td>
<td>15K affected</td>
</tr>
<tr>
<td>Mar '14</td>
<td>North Dakota University</td>
<td>Unknown source</td>
<td>290K affected</td>
</tr>
<tr>
<td>Feb '14</td>
<td>Indiana University</td>
<td>Unknown source</td>
<td>146K affected</td>
</tr>
<tr>
<td>Feb '14</td>
<td>University of Maryland</td>
<td>Unknown source</td>
<td>309K affected</td>
</tr>
</tbody>
</table>

[https://www.privacyrights.org/data-breach](https://www.privacyrights.org/data-breach)
<table>
<thead>
<tr>
<th>Threat</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laptops unencrypted and stolen</td>
</tr>
<tr>
<td>Personal devices with University data, unencrypted and stolen</td>
</tr>
<tr>
<td>Phishing and insiders giving up credentials and personal information</td>
</tr>
<tr>
<td>Servers, storage devices exposed directly to the Internet with research data</td>
</tr>
<tr>
<td>Sensitive data sent through email without being secured (encrypted) and/or sent to commercial (e.g., gmail) and other external email systems</td>
</tr>
<tr>
<td>Misconfigured, unmanaged and unpatched devices</td>
</tr>
<tr>
<td>Constant external attempts to gain access to internal information (e.g., intellectual property)</td>
</tr>
</tbody>
</table>
External Threat Landscape

- Highly automated
- Indiscriminate and targeted attacks
- 24 X 7 – never takes a vacation, never takes a holiday
- Medical records now more “valuable” than financial (e.g., credit cards)
- Hacktivist – Criminal – Insider – Espionage – Terrorism - Warfare

https://cybermap.kaspersky.com/
Security Basics -1

• Is your data **sensitive** or **important** to your institution?

• Do you **know where** your data is?
  
  ❖ Do you know **who** has access and does this align with the project/grant data-handing requirements?
  
  ❖ Is data **encrypted**?

• Are you **aware** of University and departmental policies and follow them?

• Do you **restrict** physical **access** to your area?
Security Basics - 2

• Is there professional **training and technical support** in your environment?
• Are devices and systems patched to current levels, managed and under formal change control?
• Do you have defined data retention periods, secure data archival, backup and disposal?
• Is security software installed and kept current?
• NEVER disable security software or security settings!
• Phishing is sophisticated and becoming difficult to detect (i.e., do not click on email links).
Policy Updates – Feinberg School of Medicine

- Information Security & Access policy (rewritten)
- Device Security Policy (new, no non-public data on personal devices)
- Email: Auto-forwarding, commercial email not permitted
- Email Encryption
- Data Security Plans

http://www.feinberg.northwestern.edu/it/policies/information-security/index.html
Information Security & Access Policy (rewritten, 4/15/16)
* New item, re-enforced emphasis, better clarity

- * HIPAA/HITECH is the minimum standard for data handling
- * De-identification must comply with the HIPAA Privacy rule
- * Encryption is required (portable media, laptops, desktops, everything)
- Equipment, media, paper losses must be reported immediately
- * Access to data must be maintained consistent with job role & approved IRB protocol
- Complex passwords are required
- Device security features are never to be disabled
- Research data on approved storage only (no Box.com, no Cloud)
- * Use of commercial email systems are not permitted
- Data security plans are required
- Commercial vendors used in research require Dean’s office approval
- * No non-public NU data on personal devices
Device Security Policy (new, 4/15/16)

- All devices: FSM IT managed & personal devices
- No non-public NU data on personal devices
- All devices must be encrypted and connection through only VPN
- Smartphones
  - Requires six-digit pin; and encryption enabled for Android devices
  - Limit of 30 days NU email
- Email synchronization to personal devices will be disabled on the NU email system for FSM
- Email synchronization via IMAP has been disabled
- Administrative rights will be phased-out
- Device management technology coming Fall 2016
Email Auto-forwarding (revised 12/1/15)

- Email message and attachments can be forwarded and/or auto-forwarded only within approved Northwestern-affiliated email systems. Current list published in policy.
  - northwestern.edu
  - lfh.org
  - nmff.org
  - cadencehealth.org
  - livingwellcrc.org
  - nmh.org
  - cdh.org
  - luriechildrens.org
  - northwesternmedicine.org
  - childrensmemorial.org
  - nm.org
  - ric.org
- Forwarding or auto-forwarding email messages and attachments to public email systems such as gmail.com, yahoo.com, or hotmail.com is not allowed. * The use of public email systems are not approved for any research purpose at Northwestern University, Feinberg School of Medicine.
- Email systems fsm.northwestern.edu, u.northwestern.edu and md.northwestern.edu are Google public email systems and are not part of approved Northwestern-affiliated email systems for the exchange of research data and other sensitive information.
Email Encryption (revised 12/1/15)

- Email message and attachments are required to be sent encrypted when containing PHI or PII.

- **Automatic Encryption** - Messages containing sensitive data sent from your @northwestern.edu e-mail address to or from recipients within Northwestern-affiliated domains are automatically encrypted and do not require additional effort. Northwestern-affiliated domains enabling automatic encryption:
  - northwestern.edu
  - lfh.org
  - nmff.org
  - cadencehealth.org
  - livingwellcrc.org
  - nmh.org
  - cdh.org
  - luriechildrens.org
  - northwesternmedicine.org
  - childrensmemorial.org
  - nm.org
  - ric.org

- **Manual Encryption** - Messages containing PHI or PII data sent from your @northwestern.edu e-mail address to non-Northwestern-affiliated environments will require manual encryption. Manually encrypted messages will be automatically quarantined.

- **Forced Encryption** - Email messages will be automatically encrypted and quarantined if manual encryption is not used and PHI or PII is suspected.
Data Security Plans (effective 5/5/15)

• All NU IRB protocols for clinical research studies with principal investigator appointments at FSM require a documented data security plan.
  - Plans are required for all new clinical research studies
  - Plans are required for existing studies at continuing review/renewal
• Plan will be submitted through the RSS of the IRB/RSS system.
• 13 questions (e.g., data access, data flow, data storage)
• All plans submitted subject to review (1582 as of 6/6/16) and audit (388 as of 6/6/16).
• Increases awareness of security requirements.
Updates – Information & Systems Security/Compliance

• Service Provider Security Assessment (SPSA) – January 2016
  • Vendor prequalification
  • Select or Extended Survey
  • [http://www.it.northwestern.edu/about/departments/itms/cpo/assessment.html](http://www.it.northwestern.edu/about/departments/itms/cpo/assessment.html)

• Expansion of Multifactor Authentication (DUO) – July 11, 2016
  • Already used for FASIS Self-Service
  • NUFinancials, InfoED, CATracks, & Cognos Business Intel
  • [http://www.it.northwestern.edu/security/multi-factor-authentication/index.html](http://www.it.northwestern.edu/security/multi-factor-authentication/index.html)

• Email Encryption (IronPort) – July 12, 2016
  • Newly available to all Northwestern Collaboration email users
  • [http://www.it.northwestern.edu/transitions/2016/email-encryption.html](http://www.it.northwestern.edu/transitions/2016/email-encryption.html)
Security Contacts

NUIT - Information & Systems Security/Compliance
To report or make inquiries, contact the NUIT Help Desk at 847-491-4357 or 1-HELP (from on campus)
Email: security@northwestern.edu

FSM IT
To report or make inquiries, contact the NUIT Help Desk at 847-491-4357 or 1-HELP (from on campus)
Email (end user support): fsmhelp@northwestern.edu
Email (IT Security Policy): FSMIT-policy@northwestern.edu

Carl Cammarata, Senior Director
Chief Information Security Officer
Email: carl.cammarata@northwestern.edu
Office: 312-503-2822
Northwestern University Research Administration Professionals (NURAP)

An organization to support research administration professionals
Mission

NURAP strives for a diverse membership of research administration and support professionals in departments, divisions, centers, schools and central administration units.

With an emphasis on operations and organizational management, NURAP provides an educational forum to discuss current policies, exchange best practices/ideas and network.
Grassroots Leadership

Jody K. Hirsh, President, OR, Chemistry of Life Processes Institute, EV
Nathan Youngblood, Vice President, MEAS, Research Administration, EV
Juleen Morford Secretary, FSM, IPHAM, CH
Maura Cleffi, MEAS, Materials Science & Engineering, EV
Aaron DeLee, OR, OSR, EV
Susan Hall-Perdomo, OR, Center for Sleep & Circadian Biology, EV
Chris Moores, WCAS, Chemistry, EV
Brittany Patrick, FSM, Basic Sciences Administration, CH
Michelle Suran, OR, Chemistry of Life Processes Institute, EV
Brent Bell, FSM, RAS, CH
Marta Conlon, FSM, CNDADC, CH
Maria Galent, School of Communication, EV
Tamirah Gore, OR, EV
Elzbieta Klapczynska, FSM, RAS, CH
Amanda McCrany, FSM, Psych, CH
Education and Information

NURAP Newsletter
(Information)
Member recognition, advice column, organizational news

NURAP Listserv
(Information)
Job opportunities, event announcements, internal training

NURAP Website
(Information)
Organizational information, list of previous events, membership information, resources for research administrators
www.nurap.northwestern.edu

Certified Research Administrator Exam Study Sessions
(Continuing Education)

NURAP at Noon
(Programming)
Informal informational sessions

External Groups

Central Admin

Depts. & Schools
NURAP@ NOON
PAST PROGRAMMING

Working Together to Obtain Foundation Funding

The NIH Public Access Policy: Compliance & FAQs

NU Financials: Tips and Tricks to Help You Reconcile

Paying stipend and tuition at Northwestern from Federal Grants

Subcontracts: Deciphering ESPR

Crosstown Classic: Working Interdepartmentally with Your Colleagues

Tension Reduction Techniques
NURAP@ NOON
UPCOMING PROGRAMS

• **January:** *Updates and Tools for Research Administrators in 2017*
  1/31/17

• **February:** *Purchasing – The use of stored value cards*

• **March:** *Review of Northwestern’s Travel and Expense Policy*

• **April:** *Best Practices for Departments at Award Closeout*
Website:

http://www.nurap.northwestern.edu/
Joining NURAP

How do you become a member of NURAP?
✓ Join the listserv by contacting steering committee member Susan Hall-Perdomo: s-hall4@northwestern.edu
✓ Membership in NURAP is free!
✓ Membership in NURAP is open to ALL members of the Northwestern University community involved in any aspect of research

Please Join us on Twitter, Facebook or LinkedIn
Questions?
Cindi Mason
Manager, Research Safety Training
safety-training@northwestern.edu
ORS Office and Contact Information

Evanston: Tech NG-71, 847-491-5581
Chicago: Ward B-106, 312-503-8300
E-mail: researchsafety@northwestern.edu
Why does Northwestern need ORS?

- Identify hazards
- Control risks
- Manage compliance
Regulatory Agencies

- OSHA
- CDC
- IEHA
- IATA
- NIH
- USNRC
- DOT
- FDA
- EPA
- City of Evanston
- City of Chicago
Consequences of Noncompliance

- Employee exposure to hazards
- Fines
- Loss of funding
ORS Programs

- Biological Safety
- Laboratory and Chemical Safety
- Radiation and Laser Safety
- Emergency Response
- Hazardous Waste Disposal
- Training
Biological Safety

Programs:
- Laboratory Safety Reviews - Chicago
- Recombinant DNA registration
- Human gene transfer
- Bloodborne pathogens
- Infectious agents
- Biohazard waste
- BSL3 laboratories
- Select agents
- Biosecurity
Laboratory and Chemical Safety

Programs:
• Laboratory Safety Reviews - Evanston
• Laboratory Safety and Chemical Hygiene Plan
• Lab design review
• General safe work practices
• Engineering controls
• Personal protective equipment
• Respiratory protection
• Safety equipment
• Hazardous processes
• Chemical Fume Hood Inspections
• Engineered nanoparticles
Radiation and Laser Safety

Program Areas:

Radiation Safety
- Training and Audits
- Radioactive material use authorization
- RAM inventory, accountability, receiving/shipping
- Xray
- Irradiator Security

Laser Safety
- Training and Audits
- Laser use authorization
- Laser Inventory
Emergency Response

• Hazmat response
• Spill kits
• Incident reporting
Hazardous Waste Disposal

Clean Harbors Environmental Services

- Chemical waste
- Biological waste
- Radioactive waste

http://www.research.northwestern.edu/ors/forms/purpleguide.pdf
Training

RESEARCH SAFETY TRAINING

University Faculty, Staff, and Students must have a University NetID and Employee (or Student) ID to complete Safety Training.

Not University Faculty, Staff, or Student? Click Here.

I work in a lab

GO

I don't work in a lab

View Training

LEARN @ Northwestern

Research Safety
Online system designed to inform PIs, Cores and Lab Workers about safety specific to their workplace:

- Regulations
- Engineering controls
- Safe work practices
- Personal protective equipment

https://www.nsis.northwestern.edu
NSIS: Principal Investigators

Principal Investigators: If you are new to the University and need to create an NSIS profile send an email to ors-operations@northwestern.edu. Include your name, NetID, department, anticipated date of arrival and a contact phone number and/or email address. You will receive email notification once your profile has been setup.

[Image of NSIS interface]

Welcome Cindi. You are logged in as a PI.

NSIS Home

Your "To Do" List

- Complete ORS Safety Training
- Complete Safety Forms
- Radioactive Materials Submission Menu
- Manage ORS Safety Training for Lab Workers
NSIS: Safety Evaluation

Safety Evaluation Summary

Here is the summary of your responses to the Safety Evaluation Wizard. To add or remove safety forms, modify the appropriate evaluation question response.

<table>
<thead>
<tr>
<th>Evaluation Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you use or store hazardous chemicals other than household cleaning chemicals?</td>
</tr>
<tr>
<td>Do you use or store compressed or liquefied gases?</td>
</tr>
<tr>
<td>Do you use or store controlled substances on DEA schedules?</td>
</tr>
<tr>
<td>Do you use animals for research?</td>
</tr>
<tr>
<td>Do you use human blood, blood products, body fluids or other potentially infectious</td>
</tr>
<tr>
<td>materials, including human-derived cell lines?</td>
</tr>
<tr>
<td>Do you use biological agents at Biosafety Levels 1, 2, or 3?</td>
</tr>
<tr>
<td>Do you ship hazardous materials or dangerous goods?</td>
</tr>
<tr>
<td>Do you use recombinant or synthetic nucleic acid molecules?</td>
</tr>
<tr>
<td>Does your work involve Human Gene Transfer?</td>
</tr>
<tr>
<td>Do you use select agents?</td>
</tr>
<tr>
<td>Does your work involve physical hazards?</td>
</tr>
<tr>
<td>Do you use equipment with alarms that would sound after hours?</td>
</tr>
<tr>
<td>Do you currently use radioactive materials or plan to in the future?</td>
</tr>
<tr>
<td>Do you use Class 3b and/or Class 4 lasers in your laboratory space?</td>
</tr>
<tr>
<td>Do you use x-ray equipment in your laboratory space?</td>
</tr>
</tbody>
</table>
NSIS: Lab Workers

Welcome Cindi. You logged in as a Lab Worker for Pi Mason.

To Do
- Viewed Safety Forms
- Lab Personnel

Your "To Do" List
- Complete Hepatitis B Vaccination Consent/Waiver Form
- Complete ORS Safety Training

View PI Safety Forms
- Start Emergency Information
- Start Laser Equipment
- Start X-Ray Equipment
Laboratory Safety Review

<table>
<thead>
<tr>
<th>Question Text</th>
<th>Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Chemicals of Interest, Compressed Gases, and Hazardous Chemical modules have been reviewed within the past year.</td>
<td>Y</td>
</tr>
<tr>
<td>2. The PI’s safety profile in NSIS is up-to-date for all laboratory areas (i.e., PI reviewed within the past 12 months) The list of laboratory hazards, lab locations and workers on the profile is current.</td>
<td>Y</td>
</tr>
<tr>
<td>3. Safety Data Sheets (SDS) for all hazardous chemicals are accessible to all personnel handling the chemicals.</td>
<td>Y</td>
</tr>
<tr>
<td>4. All lab exposures, incidents, and injuries within the last twelve months have been reported to ORS.</td>
<td>Y</td>
</tr>
</tbody>
</table>

- Initial visit for new labs then annual*
- Interview PI/Safety Designate and Lab Workers
- Visual inspection
- Deficiencies require follow-up
Safety Services from Other Depts.

Risk Management
• Fire safety, evacuation plans, workers compensation

University Services
• Purchasing, compressed gases, dry ice and liquid nitrogen

University Police
• Personal safety, security threats and breaches

http://www.research.northwestern.edu/ors/info/whodoeswhat.html
Visitors and Volunteers

- Safety regulations extend to visitors and volunteers
- Training required if the person will work unsupervised
- See Human Resources site

http://www.research.northwestern.edu/ors/training/visitor-volunteer.html
What Now?

• Review ORS website

• Review the Essential Guide

• Acquire Department Administrator access to NSIS

• Review your department info in NSIS

http://www.research.northwestern.edu/ors
Questions?
Networking/Break
Cost Principles for Sponsored Projects Administration

Jennifer Mitchell
Associate Executive Director for Research Financial Operations
Office of Financial Operations
Cost Studies

The Office of Cost Studies is dedicated to providing analytical, cost accounting, and effort reporting expertise to the management of Northwestern University's research enterprise and to the fulfillment of broader operational objectives. We establish and oversee conformance with University policy, procedure, and practice in matters relating to cost accounting and effort reporting for sponsored programs.

Responsibilities

- Cost Accounting Principles
- F&A Costs
- Compensation - Effort Reporting
- Recharge/Service Centers
- Financial Surveys
- Costing Analysis

http://www.northwestern.edu/coststudies
2 CFR 200
UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS (UNIFORM GUIDANCE)

• Effective Dec 26, 2014
• Supersedes 8 OMB circulars, including A-21, A-110, and A-133
  – A-21: Cost Principles for Institutions in Higher Education
  – A-110: Administrative Requirements
  – A-133: Audit Requirements
  – Applied to Audit: period starting Dec 26, 2014
• Download:
  http://www.ecfr.gov/cgi-bin/textidx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
## Organization of Uniform Guidance

<table>
<thead>
<tr>
<th>Subpart</th>
<th>Title and Emphasis</th>
<th>Section No.</th>
<th>Predominate Sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subpart A</td>
<td>Acronyms &amp; Definitions</td>
<td>200.0 to 200.99</td>
<td>New</td>
</tr>
<tr>
<td>Subpart B</td>
<td>General Provisions</td>
<td>200.1xx</td>
<td></td>
</tr>
<tr>
<td>Subpart C</td>
<td>Pre-Federal Award</td>
<td>200.2xx</td>
<td></td>
</tr>
<tr>
<td>Subpart D</td>
<td>Post-Federal Award - including Procurement, Standards for Financial and Program Management, and Subrecipients Monitoring</td>
<td>200.3xx</td>
<td>A-110, A-102</td>
</tr>
<tr>
<td>Subpart E</td>
<td>Cost Principles – including Direct &amp; Indirect (F&amp;A) Costs, and Compensation-Personal Services</td>
<td>200.4xx</td>
<td>A-21, A-87, A-122</td>
</tr>
<tr>
<td>Subpart F</td>
<td>Audit Requirements</td>
<td>200.5xx</td>
<td>A-133</td>
</tr>
<tr>
<td>Appendices</td>
<td>Combination of all 8 circulars; III – F&amp;A for Educational Institutions</td>
<td>I to XI</td>
<td></td>
</tr>
</tbody>
</table>
## Risks of Non-compliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Date Settled/Agency</th>
<th>Issues</th>
<th>Settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northwestern University</td>
<td>2004/ NIH</td>
<td>Institutional base salary, K award, Certifier Assignment</td>
<td>$5.5 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>July 2008/ NIH, CDC, HUD</td>
<td>Supplemental compensation, effort reporting</td>
<td>$1 million</td>
</tr>
<tr>
<td>Yale University</td>
<td>Dec 2008/ 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 2009/ NIH</td>
<td>Direct charging of administrative and clerical costs</td>
<td>Final settlement &lt; recommended $ by the auditor</td>
</tr>
</tbody>
</table>
Roles and Responsibilities

- Are you involved in managing these funds?
  *Fund 610 to 650 (Sponsored) & 191 to 193 (Cost Share)*
  
  - Research administration includes providing stewardship to appropriately manage grants and contracts *at All Levels*

- Internal Controls (Section 200.303)
  - **Must** maintain effective internal control over the federal award that provides reasonable assurance…
  - **Must** comply, evaluate and monitor compliance with federal statutes, regulations and the terms and conditions of the federal awards
  - **Must** take prompt action when non-compliance is identified
Sponsored Project Costs

Sponsored project costs are comprised of allowable direct costs plus the allocable portion of allowable indirect costs.
Direct vs. Indirect (F&A) Costs

- Direct Costs:
  - PI Salary
  - Equipment
  - Fringe Benefits

- F&A Costs:
  - Office Computer
  - Admin Salary
  - Building
Guiding Principles for Charging Costs

- Reasonable
- Allocable
- Allowable
Guiding Principles: Allowability (200.403)

- Be necessary and reasonable for the performance of the award and be allocable thereto under these principles.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities.
- Ensuring consistent treatment. A cost is either direct or indirect cost when for the same purpose in like circumstances.
- Not included as a cost or cost sharing on another award
- Be adequately documented
Unallowable Costs Examples

- Uniform Guidance:
  - 200.423 Alcoholic beverages
  - 200.424 Alumni/ae activities
  - 200.429 Commencement costs
  - 200.438 Entertainment costs
  - 200.441 Fines, penalties and settlements
  - 200.442 Fund raising
  - 200.445 Goods or services for personal use
  - 200.450 Lobbying
  - 200.469 Student Activity Costs (including athletics)

- Agency-specific policy (e.g., NIH salary limitation)
- University policy (e.g., Employee morale costs)
- Award-specific terms & conditions (e.g., Some grants prohibit foreign travel)
Guiding Principles: Reasonable Costs (200.404)

- is determined by the prudent person test. i.e., are the nature and charge amount not excessive and within the bounds of common sense?

- Generally recognized as ordinary and necessary.
Can the charge pass the “Test of Reasonableness”?

- Common sense – will another prudent person make the same decision?
- How would it look if published in the Chicago Tribune?
- Is it consistent with ethical business practices and applicable laws?
Guiding Principles: Allocable Costs (200.405)

A cost is allocable to a sponsored agreement if:
- It is incurred solely to advance the work under the sponsored agreement;
- The cost is charged in accordance with relative benefits received or other equitable relationship.
Allocability

An appropriate method should be used to allocate the costs of bulk purchases to individual project (see below)

Allocate based on a reasonable estimate of actual consumption

Allocate based on the number of grants in the department
Can I Charge this Cost to an Award?

Reasonable? Allowable? Allocable?

Yes

Direct or F&A? (consistency)

Direct

Charge the cost to the award using the appropriate expense object Account Code

No

F&A

Charge to a non-sponsored account

STOP

Charge to a non-sponsored account
Check Your Knowledge
Facilities & Administrative Rate

Jennifer Mitchell
Associate Executive Director for Research Financial Operations
Office of Financial Operations
Higher Education: 4 Major Functions

- Instruction
- Organized Research
- Other Sponsored Activities
- Other Institutional Activities
F&A Rates

• All research and development activities of an institution Facilities and Administrative Cost - also known as Indirect Cost, Overhead Cost

• F&A Rates are Calculated per Major Function once every 3 or 4 years by the Office of Cost Studies

• F&A Rates of Instruction, Organized Research, and Other Sponsored Activities are then Negotiated with the Federal government

• Organized Research accounts for the largest reimbursement of the F&A Cost and is today’s focus
All research and development activities of an institution are separately budgeted and accounted for including:

1. **Sponsored Research**: All research and development activities that are sponsored by Federal and non-Federal agencies and organizations

2. **University Research**: All research and development activities that are separately budgeted and accounted for by the institution under an internal application of institutional funds
F&A Rate Calculation

- The rate is based on a periodic calculation and submission of a rate proposal, which is then negotiated with Northwestern’s cognizant agency (DHHS)

\[
\text{Indirect Costs} \quad \text{Supporting Organized Research} = 54.5\%
\]

\[
\text{Direct Costs} \quad \text{of Organized Research}
\]
F&A Rate Development Methodology

Indirect Cost Assignment & Allocation

Direct Cost Buckets

- Instruction
- Organized Research
- Other Sponsored Activities
- Other Institutional Activities
The F&A Ratio

The “Pools”
- Facilities costs
- Administrative costs
- Based on allocations of actual costs

Indirect Cost “Pools” = 54.5%

Direct Cost “Base”

The Base
- Based on actual costs charged to research projects
- Typically expressed as MTDC but can be TDC or salary & wages
Facilities & Administrative Costs

Facilities Related Costs
- Building Depreciation/ Use Allowance
- Equipment Depreciation/ Use Allowance
- Interest
- Operations & Maintenance
- Library

Administrative Related Costs
- General Administration (GA)*
- Department Administration (DA)*
- Sponsored Projects Administration (SPA)*
- Student Services
F&A Rate Calculation

1. Assign expenditures to pools and bases by function code
2. Remove unallowable costs from pools*
3. Allocate allowable pool costs to major functions
4. Divide: F&A Costs allocated to OR/MTDC* of OR
### Step 3: Allocate Allowable Pool Costs to Major Functions

#### Indirect Cost Pool Allocation Detail

<table>
<thead>
<tr>
<th>Indirect Cost Pool</th>
<th>Allocation Basis</th>
<th>Allocation Basis Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilities</td>
<td>Square Feet</td>
<td>• Allocation Statistic is equal to Sq. Ft used for each Major Function divided by Total Assignable Sq. Ft</td>
</tr>
<tr>
<td>Admin</td>
<td>Modified Total Cost of each major function</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Major Function</th>
<th>Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Administration</td>
<td>University-wide MTC</td>
</tr>
<tr>
<td>Department Administration</td>
<td>School/ Department MTC</td>
</tr>
<tr>
<td>Sponsored Projects Administration</td>
<td>Sponsored project MTC</td>
</tr>
<tr>
<td>Student Services</td>
<td>Allocated 100% to Instruction</td>
</tr>
</tbody>
</table>
How F&A Costs are Distributed

F&A Costs Distribution:

- **Allowable Facilities Related Indirect Costs**: $150M
  - To **Space Allocations**: $32M, $22.5M
  - To **MTC & Other Allocations**: $52.5M, $20.0M

- **Allowable Administrative Indirect Costs**: $50M
  - To **Space Allocations**: $22.5M
  - To **MTC & Other Allocations**: $1.25M, $45M

**Total Allocation**:
- **Space Allocations**: $54.5M
- **MTC & Other Allocations**: $72.5M
- **Other Sponsored Activities**: $23.75M
- **Other Institutional Activities**: $51.25M

Organized Research $100M MTDC
Instruction $200M MTDC
Other Sponsored Activities $10M MTDC
Other Institutional Activities $90M MTDC
Organized Research – F&A Rate

Allowable Facilities Related Indirect Costs $150M

Allowable Administrative Indirect Costs $50M

Space Allocations 25% to Research

MTC & Other Allocations 45% to Research

$32M $22.5M

$54.5M F&A

Organized Research $100M MTDC

= 54.5% Research F&A Cost Rate
Space Survey

Why is it Important?

- Cost allocation for building and equipment depreciation/interest
- Operations and maintenance
- Rate is uncapped

How Can You Help?

- Key for F&A rate calculation*
- Offices will be calculated based on salary distribution by the Office of Cost Studies*
- For labs, account for who worked in the lab
  - Understand the funding per lab
  - Training grants vs. research grants
  - Recharge
Maximizing F&A Recovery

• F&A recovery is a critical part of the University's budget and necessary to support a sustained investment in the research enterprise

• Negotiated rate is almost always less than the actual calculated rate*

• Accessing the F&A rate represents recovery of costs already incurred by the University, which benefited the sponsors
F&A Rate Calculation: How Can You Help?

Conduct the following activities *Timely and Appropriately*:

- Effort reporting (working with Cost Studies)
- Space survey (working with Facility Management and Cost Studies)
- Equipment inventory (working with Account Services and Cost Studies)
Questions?
Cost Sharing

Office for Sponsored Research
What is Cost Sharing?

• The portion of total project or program costs (direct and indirect) not borne by the sponsor.
  – The University or a third party (such as a subcontractor or an unfunded collaborator) bears the cost
  – Normally in the form of a direct costs, e.g. salary, and unrecovered F&A associated with these direct costs
  – With sponsor approval, may take the form of F&A costs where reimbursement is waived or reduced
Cost Matching

• “Cost Sharing = “Cost Matching”
  – Terms can be (and often are) used interchangeably
  – However, the terms “cost matching” often refers to cost sharing agreements in which the amount of sponsor funding is based on an equal or proportionate commitment (e.g., 1:1) from the University.
Cost Sharing

• Appropriate Sources for Cash Funds
  – Gifts
  – Endowments
  – Unrestricted discretionary funds

• Common Types of In-Kind Cost Share
  – Faculty Effort
  – Unrecovered F&A
  – Graduate Student Fellowships
Positive Impacts of Cost Sharing

• Positive
  – Helps Northwestern be eligible for certain programs
  – Makes Northwestern more competitive for certain programs
  – Helps Northwestern allocate resources to areas of strategic national importance
Negative Impacts of Cost Sharing

• Negative
  – Financial
  – Administrative
  – Compliance
  – Investigator
  – F&A Rate Decrease
Institutional Position on Cost Share

- Northwestern only engages in cost sharing when it is in the best overall interest of the University
  - Mandated by sponsor solicitation or policy
  - Deemed appropriate in light of specific circumstances
Requesting Institutional (OR) Support

- Large-Scale, Interdisciplinary Proposals
  - DoD, DoE, NSF
  - NIH Program Project Grants or Center Grants (P Series)
- Instrumentation Proposals
  - NSF Major Research Instrumentation (MRI)
  - NIH Shared & High-End Instrumentation (S10/HEI)
- OR does not consider requests for “cap gap” cost sharing
Types of Cost Sharing

- Mandatory Cost Share (MCS)
- Voluntary Committed Cost Share (VCCS)
- Voluntary Uncommitted Cost Share (VUCS)
## Required Cost Share Fund Codes

<table>
<thead>
<tr>
<th>Type</th>
<th>Fund</th>
<th>Cost Share Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory Cost Share</td>
<td>191</td>
<td>Required by sponsors as a matter of statute, regulation or policy, or is indicated in individual solicitations</td>
</tr>
<tr>
<td>Over the Cap Commitment</td>
<td>192</td>
<td>Difference between actual salary and sponsor imposed salary cap (e.g. NIH)</td>
</tr>
<tr>
<td>Voluntary Committed Cost Share</td>
<td>193</td>
<td>Not required by the sponsor as a condition of award but provided at the proposal stage at the discretion of the institution.</td>
</tr>
</tbody>
</table>
Cost Sharing Requirements

• Verifiable from the recipient’s records

• Not included as contributions for any other Federally-assisted project or program*

• Necessary and reasonable*

• Allowable*

• Not paid by the Federal Government under another award*

• Provided for in the approved budget when required by the Federal awarding agency
Unacceptable Forms of Cost Sharing

• Costs funded by other sponsored projects

• Costs pledged as cost sharing for another funded project

• Unfunded salary for effort beyond the contractual appointment period*

• Costs reimbursed through the F&A rate*

• Salary dollars above the regulatory cap*

• Costs not deemed to be necessary and reasonable*
Cost Sharing Best Practices

• MCS, VCCS and Salary-over-the-cap cost must be tracked and reported in F&A proposals and Effort Certification

• Work with OSR to ensure the appropriate cost share chart strings are open upon award notification

• Fund the CS chartstring by a non-sponsored source
Accounting for Cost Sharing

• Ensures Northwestern can provide verification that MCS and VCCS obligations have been met

• Ensures proper classification of costs in F&A rate calculation*

• Provides valuable management information in the form of accurate financial accounting*
Questions?
Networking/Break
Cost Transfers

Jennifer Mitchell
Associate Executive Director for Research Financial Operations
Office of Financial Operations
What is a Cost Transfer (Journal)?

The act of moving a charge from one project/account to another

- Cost transfers can occur:
  - Between two sponsored accounts
  - From a non-sponsored account to a sponsored account
  - From a sponsored account to a non-sponsored account, or
  - Between two non-sponsored accounts
Why are Cost Transfers Problematic?

- A cost that is originally placed on an account is certified for allowability, allocability tests and direct benefit to a project

- A cost transfer invalidates that original certification
## Risks of Non-compliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Date Settled/Agency</th>
<th>Issues</th>
<th>Settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northwestern University</td>
<td>2004/ NIH</td>
<td>Institutional base salary, K award, Certifier Assignment</td>
<td>$5.5 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>July 2008/ NIH, CDC, HUD</td>
<td>Supplemental compensation, effort reporting</td>
<td>$1 million</td>
</tr>
<tr>
<td>Yale University</td>
<td>Dec 2008/ 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 2009/ NIH</td>
<td>Direct charging of administrative and clerical costs</td>
<td>Final settlement &lt; recommended $ by the auditor</td>
</tr>
</tbody>
</table>
Cost Transfer Guiding Principles

• Are for **correcting errors**
• Must **not** be used as a means of managing available cash balances
• Project funds are not interchangeable; the integrity of each grant account must be maintained
• Reasonableness, allowability, allocability, and consistency **must be established**; the need for a cost transfer must reflect adherence to federal cost principles and must be **well-documented**
• Costs applicable to several projects **cannot** be charged solely to a single project
• Costs not allocable to a project **cannot** be charged to that project (even temporarily)
NIH and Northwestern Standards

Cost Transfer Standards

Northwestern
- Must be made within 90 days of the original charge
- Transfers of salary charges should take place before certifying effort
- 90 day exception letter needed for transfers made after 90 days*
- Cost transfers greater than 12 months after the date of occurrence*

NIH
- Must be made 90 days after error is discovered
Cost Transfer Documentation

Salaries/wages cost transfers (journals) must be supported by certified effort report if the reporting period has been open in the Effort Reporting System (ERS)

- Links to 90-day cost transfer memo and related references: http://www.northwestern.edu/coststudies/salary-cost-transfers.html
Cost Transfer Red Flags

- Transfers made in excess of 90 days after the original charge
- Transfers without a full explanation or “cookie cutter” explanations (e.g., “to correct error”)
- High volume of transfers (especially during the last month of the award)
- Patterns in timing (i.e., near end of project period) and “route” (mostly onto, and rarely off of sponsored projects) of transfers
- Transfers among “closely related” projects
- Grant to Grant transfer
How to Prevent *Unnecessary* Cost Transfers

- Establishing pre-award chartstrings, when appropriate, can prevent future cost transfers
  - Pre-award spending allows the PI to begin work and record charges against the proper chartstring related to a project before the start of the award
  - Keep in mind that costs are incurred at the institution’s or department’s risk
  - To establish a pre-award chartstring, submit the request via ESPR explaining the need and supplying budget details
- Establishing a financial plan that enables you to proactively charge expenses to the correct chartstrings from the onset
- Communicating with Payroll, recharges centers and other staff that process expenses to the grant
Timeliness and Closeouts

• Submitting cost transfer in time for reporting is a major consideration as the government tightens its closeout processes (e.g., Payment Management System).

• Deadlines for reporting expenses have changed significantly.

• What do these new rules mean…
  – Grant expense need to be reconciled by the end date of the grant, not after the grant end date.
  – Cost transfers submitted after the grant end date may not make the report and could be denied.
    • Department may lose funding if they have not charged expenses timely.
Recharge Centers (Service Centers) and Program Income

Jennifer Mitchell
Associate Executive Director for Research Financial Operations
Office of Financial Operations
What is a Service (Recharge) Center?

A Service Center is an Operating Unit that has the expertise to provide specialized services/goods to internal (NU) customers on a recurring basis and needs to recover the costs of providing the goods/services.

- Costs of providing the good/service are recovered through fees to users, primarily Northwestern faculty, staff, and students.
- Service Centers aka. Recharge Centers.
Why Do We Need Service (Recharge) Centers?

Good and/or service may not be otherwise available

Increase procurement efficiency or convenience

Examples:
Use of a MRI machine, Cleanroom, Machine shop, etc.
Categories of Service Centers

- **Specialized Service Facility**
  - (Direct + Indirect = Fully loaded costs)
  - e.g., CCM (Animal Facility), Telecommunication

- **Core Facilities**
  - (Shared resources with a research aim)
  - e.g., Genomics, IMSERC

- **University-wide Service/Recharge Center**
  - (Managed by Central – e.g., Facility Management)

- **Department Recharge Center**
  - (Operated by a department)
  - e.g., Machine shop
When is a Recharge Center Needed?

• Examples
  – **Recurring Use** of an instrument by other researchers and need to recover the labor, maintenance, and/or applicable equipment depreciation cost
  – **Recurring Services** to provide goods or expertise to users and need to recover the operating costs

Contact us! A cost study of the recharge rates should be performed to ensure the charges are based on actual costs and *No profit is built into the rates for internal usage*. 
SETTING THE RECHARGE RATES - COST BASED APPROACH

The Basic Equation:

\[ \text{Direct Operating Costs: Labor (Salary + Fringe)} + \text{Direct Operating Costs: Non-Labor Costs (supplies, maintenance contracts, etc.)} + \text{Annual Equipment Depreciation (if utilized*)} - \text{Subsidies} -/+ \text{Prior -year balance} \]

\[ + \text{Projected # of Goods or Services Sold} \]

= "Calculated" Rate per Unit

(may not be the same as the Actual Recharge Rate)

*Special attention to utilizing equipment depreciation (see later slides)
Examples of Measurable Units for Goods or Services

- Labor hour
- Machine hour
- CPU unit
- Per Rack Unit
- Daily rate
- Test
- Slide
- Page
- Cup
Recharge Rates & Subsidy Consideration

• Most recharge centers are supported (subsidized) by the university, school or department
• Charges to users must be equitable so no Federally sponsored user subsidizes another user
  – If a lower rate is provided to certain users only, subsidy/support from another allowable source should be provided to account for the difference
• Recharge rates are cost-based; the revenue from the recharge center cannot be treated as profit and used to purchase capital equipment or fund department deficits
• Recharge rates should be reviewed and approved by Cost Studies on an annual basis
  – Use the annually approved rates to charge users
What is the treatment of revenue when a recharge center supported by federal grant(s) generates a net surplus during the award period?
Program Income

• Program income is gross income—earned by a grantee, a consortium participant, or a contractor under a grant—that was directly generated by the grant-supported activity or earned as a result of the award.

• Any costs associated with the generation of the gross amount of program income that are not charged to the grant should be deducted from the gross program income earned, and the net program income should be the amount reported.

• Must be reported to the agency.
Examples of Program Income

- **Fees for services performed**
- Money from the use, sale, or rental of equipment purchased with project funds
- Sale of supplies or equipment purchased or fabricated with project funds
- Sale of software, tapes or publications
- Sale of research materials, such as animal models, vectors, or reagents
- Fees from participants at conferences or symposia
## Use of Program Income

<table>
<thead>
<tr>
<th>Program Income Alternative</th>
<th>Use of Program Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>Additive</td>
<td>Added to funds committed to the project or program and used to further eligible project or program objectives.</td>
</tr>
<tr>
<td>Deductive</td>
<td>Deducted from total allowable costs of the project or program to determine the net allowable costs on which the Federal share of costs will be based.</td>
</tr>
<tr>
<td>Combination</td>
<td>Uses all program income up to (and including) $25,000 as specified under the additive alternative and any amount of program income exceeding $25,000 under the deductive alternative.</td>
</tr>
<tr>
<td>Matching</td>
<td>Used to satisfy all or part of the non-Federal share of a project or program.</td>
</tr>
</tbody>
</table>
Roles and Responsibilities

Service Center Director/Mgr

• Manages routine operations
• Prepares rates
• Adhere to the approved rates when charging customers
• Tracks financial performance
• Administers billing and collection activities

Office of Cost Studies

• Assists in development
• Reconciles capital equipment information
• Reviews and approves rate calculation
• Helps correct non-compliant practices
• Establishes/monitors adherence to policy

http://www.northwestern.edu/coststudies/recharge.html
Questions?
Core Facilities Administration

Aaron Rosen
Financial Administrator
Office for Research
aaron-rosen@northwestern.edu
What are Core Facilities?

• **Core Facilities** are “Recharge Centers” operating under a fee-for-service model, with the mission of enabling research at Northwestern
  – **Department Core Facilities** serve researchers in a single department, earning revenue less than $30K/year
  – **University Core Facilities** serve researchers in multiple departments, earning revenue greater than $30K/year
  – **Clinical Core Facilities** serve the research needs of researchers/clinicians engaged in clinical research studies
What do Core Facilities do?

• **Cores are centralized research laboratories with state-of-the-art (expensive) equipment:**
  – Electron and confocal microscopes (hard/soft mat.)
  – Mass spectroscopy/NMR facilities (chem, drug discovery)
  – Functional MRI facilities (human, animal)
  – Cleanrooms for micro/nano-fabrication

• **Cores provide centralized services to researchers:**
  – Genomics/Proteomics/Animal Model services
  – Synthesis and characterization of biomolecules (small molecules, peptides, proteins)

Note: Office for Research maintains a website listing University cores: [http://www.facilities.research.northwestern.edu/](http://www.facilities.research.northwestern.edu/)
How are Core Facilities Supported?

• **Central Oversight of University Core Facilities**
  • Administrative and Financial Services (NUcore)
  • Rigorous Evaluation of Annual Reports (Awards)
  • Policies and Regulations (federal, university)
  • Marketing and UI Partnerships
  • Professional Development Opportunities

• **Annual Financial Support**
  • OR (approx. $2M/yr)
  • Centers, Schools, Departments (approx. $2M/yr)

• **Construction and Improvements of Space for Core Facilities**
How are Core Facilities Supported (cont’d)?

- **Office for Research Equipment Grants**: two competitive rounds per year, support equipment purchases up to $100K, ReLODE loan program
- **Office for Research Operating Support**: requested via the Annual Report, supports expenses not allowable on recharge, facility growth, unexpected expenses
- **FSM Dean’s Office Support**: competitive, single round per year, provides subsidies for cores serving FSM researchers
- **Voucher Program**: when a PI donates new equipment to a core facility, they are eligible for a voucher to use the equipment
Financial Services Support by OR

- NUcore Software
- NU Financials Tracking
- Cost Studies/Pricing
- UBI Reporting

- Research Administrators can be added as “Business Administrators” on their portfolio of chart strings in NUCore
- “Business Administrators” can review transactions, dispute charges, and manage access to their portfolio of chart strings across all core facilities
- Advantages of active management: avoid overspending and unauthorized spending with active review, ensuring that researchers are selecting the correct chart string for purchases, have appropriate access, and are not overspending increasingly tight grant and non-grant budgets!
Additional Support of Core Facilities

• Schools and Depts provide operating subsidies and/or annual deficit coverage to core facilities
• Core-specific grants reduce the operating costs (NIH RHLCCC grant and other P30’s, NSF MRSEC grant)
• External users charged a higher rates - especially commercial users that can help a core facility balance its budget (some transactions may be taxable!)
How can I learn more about Core Facilities?

• Internal Opportunities
  – Core Facility Listserv (email Sasha for access)
  – Quarterly Brown Bags (notes available on website)
  – Kellogg Course: Leadership and Management in Core Facilities (annual 4-day mini-MBA focusing on core facilities)
  – Quarterly NUCore Tech Talks (session recordings on website)

• External Opportunities
  – National: ABRF (Association Biomolecular Resource Facilities)
  – Regional: MWACD (Midwest chapter of ABRF)
Who can I contact with questions?

- Phil Hockberger
  - Assistant VP for Research
- Aaron Rosen
  - Financial Administrator (OR)
- Aleksandra (Sasha) Mechetner
  - Administrative Assistant (OR)
- Jeff Weiss
  - Director for Research Core Planning (FSM)
- Todd Shamaly
  - Senior Application Support Specialist (FSM/OR)
Day 2 is Complete!

Thank you for attending day 2 of the Research Administration Training Seminar!

I will be emailing a brief survey regarding day 2 of this training. Please take a few minutes to fill it out as we are always looking for suggestions for improvement!

The next session is on **Monday, 01/30 at 1:00pm in FSM – McGaw, Daniel Hale Williams Auditorium**. If you have any questions or concerns, please do not hesitate to contact me.