Annual Update

2022

Agenda Topics

- NSPM-33 Disclosure Requirements
- Data Management and Sharing Plans
- Updated Guidance on Faculty Consulting
- Fixed Asset Policy Changes
- Re-Issued Summer Salary Guidelines
- Reminder about Passwords/IT Security
- WorkDay Payroll Implementation
- Student Health Insurance
- Subcontract Process

NSPM-33 Disclosure Requirements

- NSPM-33's purpose is to provide clarity regarding research security program requirements, how research organizations will be expected to satisfy the requirements, and how agencies will contribute to program content development.

- Security program content:
  - Cybersecurity
  - Foreign travel security
  - Research security training
  - Export control training, as appropriate

  Disclosure requirements for each researcher are described in the next several slides…

NSPM-33 Disclosure Requirements

- Standardization of disclosure requirements across agencies.

- PI and Senior/Key Personnel must disclose:
  - Organizational Affiliations/Employment
  - Positions/Appointments
  - Foreign Government sponsored talent recruitment programs
  - Current and Pending Support/Other Support

NSPM-33 Disclosure Requirements

- Exclusions from disclosure requirements:
  - Completed support
  - Consulting permitted by an individual's appointment and employer's policies
  - Honoraria (defined)
  - Gifts (defined)
  - Mentoring as part of appointment
  - Teaching commitments at employer
  - Academic/Calendar year salary earned at employer

NSPM-33 Disclosure Requirements

- NSF will not be requiring copies of foreign contracts, but NIH will require copies.
- NSF requires SciENcv for submission of biographical sketch and current and pending support.
- Do not inappropriately characterize research activities or involvement in foreign government sponsored talent recruitment programs as "consulting".

NSPM-33 Disclosure Requirements

- Researcher maintains information required for disclosure on an individual "profile" or "record" maintained by a Digital Persistent Identifiers (DPI) service (i.e., ORCID)

NIH Data Management and Sharing Plans

- All NIH funding applications submitted on or after January 25, 2023 must include a data management and sharing plan (DMSP).

- Plans should be two pages or less and should describe the data which will be preserved or shared, how it will be done (i.e., tools, software, data standards, repositories, ORCIDs) and who will be responsible for managing compliance with the plan.

- Data should be shared at the earlier of when findings are published or at the end of the award.

NIH Data Management and Sharing Plans

- Many other agencies and foundation have requirements for DMSPs. See the Miner Library [site](#) .

- NIH requirements are much more robust and compliance is mandated.

- Will other agencies follow NIH's lead?

NIH Data Management and Sharing Plans

- The NIH considers "scientific data" to be any data that validates or replicates research findings, whether or not they are used to support scholarly publication.
- An ORCID ID can help track reuse of the data.
- The plans will be reviewed by NIH program staff and peer reviewers will only consider a proposal if the data management budget is acceptable.

NIH Data Management and Sharing Plans

Allowable costs for DMS must be included in the budget. Allowable Costs include:

- Curating data and developing supporting documentation
- Formatting data or costs for transmission to, and storage at, selected repository
- De-identifying data
- Preparing metadata
- Local data management considerations
- Preserving and sharing data through established repositories, such as data deposit fees

NIH Data Management and Sharing Plans

- Allowable costs submitted in budget requests must be incurred during performance period, even for data preserved and shared beyond the award period.

- For instance, costs for a preserving data for 10-years in a repository must be paid before the end of the period of performance.

- Must include a brief justification of the proposed activities in the DMS plan that will incur costs

NIH Data Management and Sharing Plans

Budget requests must NOT include:

- Infrastructure costs included in institutional overhead

- Costs associated w/ routine conduct of research (e.g., collecting or accessing research data)

- Costs that are double-charged or inconsistently charged as both direct and indirect costs

NIH Data Management and Sharing Plans

- If you care to take a deeper dive --

  - **[January 10, 2023 from 3 to 4 pm](#)**

Updated Guidance on Faculty Consulting

- The document entitled "Guidance and Advice for Faculty who Engage in Outside Consulting" was updated and revised.

- It provides references to related guidance and policies; issues to consider when undertaking outside consulting; and explanation of agreement terms of potential concerns

- Reminder: Consulting relationships are generally not permitted for the conduct of research. Consult with applicable Dean's office or ORPA prior to entering into outside research obligations.

- Reminder: Arrangements to provide clinical care by clinical faculty are to be through University contracts with outside entities, rather than through individual consulting arrangements.

Fixed Asset Policy Changes

- Effective 7/1/23, the capitalization threshold for purchases for the UR will increase to $5,000 per unit.

- Equipment purchased prior to 7/1/23 for less than $5,000 will still need to be tracked in URSpace if the equipment is being utilized for the intended purpose.

- Indirect costs will be applied to expenditures for items with a purchase price of less than $5,000 billed on or after 7/1/23.

- For all future proposal submissions, proposal budgets should be prepared such that they reflect the new $5,000 capitalization threshold.

Re-Issued Summer Salary Guidelines

Applies to 9 Month appointments whereby research is being conducted in the summer months (June, July, August)

- Faculty many not charge more than 5/6 of any summer month to government sponsored research projects, except in unusual circumstances.

- If faculty charge 100% of a summer month to a project, 100% of their time must actually be devoted to the project (no vacation, academic or administrative efforts).

Re-Issued Summer Salary Guidelines

- 1/6 of a summer month (at a minimum) should be allocated to an unrestricted account to recognize non-sponsored activities.

- Under most research awards, the University has Expanded Authorities and can rebudget salary from summer months to the academic year without explicit agency approval (and assuming the effort is expended on the project during the academic year).

Re-Issued Summer Salary Guidelines

- Dean's Office approval is needed when a faculty member requests:

    - At least one full month of compensation to be fully allocated to sponsored project accounts in a single month
    - Greater than 2.5 months of compensation to be paid in the summer, even if not fully allocated to sponsored project accounts

Reminder about Passwords/IT Security

- Passwords must not be shared.
- Avoid sharing or storing confidential information by nonsecure means.
- Anyone who knows or suspects that a University password has been compromised must promptly report that to a supervisor, IT staff, Public Safety, Privacy Office, or other appropriate University department.

- ***Relevant to the integrity of digital signatures***

WorkDay Payroll Implementation

- Replacement of HRMS/PeopleSoft with WorkDay Payroll (URHCM) Go-Live – Jan '24

- PAF's will no longer be the means of certifying effort.
- Effort reporting will be done in URHCM.

- Certification will be performed during effort change process (consistent).

- Every six months - 100% certification.

- Communication of Change - TBD(elivered)

WorkDay Payroll Implementation

- Ability to retroactively change salary allocations will be extremely limited in the WorkDay Payroll (URHCM) system

- Initiative forthcoming from October 2023 – December 2023 to ensure allocations are up-to-date in HRMS prior to transition to WorkDay Payroll (URHCM). Stay tuned!

Student Health Insurance

- The University now provides funding for single-payer health insurance coverage from University Health Services to all eligible full-time PhD students (Aug 22).

- Sponsored program proposals **must** now include budgeted costs for such insurance for projects whereby PhD student stipends are budgeted direct project costs.

- In instances where stipends are allocated among more than one funding source, the health insurance costs must also be similarly allocated.

Student Health Insurance

- For external sponsors that do not allow for health insurance costs, documentation should be provided to the applicable Dean's Office at the time of proposal submission.

- Such costs will be treated uniformly, whether paid by sponsored programs or other funding sources.

Subcontract Process
New Process

- **Dept notices Subcontract error**
  - Obtain email received from ORPA/IORA notifying Dept of New or Amended Subcontract
  - Forward email to Jeff Sullivan requesting edit be enacted in URF
  - Wait 1 day for update to be made, confirm accuracy of edit

Subcontract Process
Process related to "Remit to" addresses when paying a sub

- In the event you attempt to process a SIR and an error occurs – reach out to your Staff Acct/Senior to resolve. John Loux is always ready to assist as well (ultimately Jeff resolves)

- When we obtain the executed agreement the "remit to" address is not always what arrives on invoices, so we choose one hoping to get it right (90%) and we fix the others (10%).

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Questions?