Agenda

8:00 a.m. Networking and Refreshments
8:30 a.m. Agenda
1. Huron Report, OSP Updates, Uniform Guidance
2. Export Controls Update
3. Cost Transfers on Sponsored Projects and FDP
4. Foundation Relations and Proposals
5. Predatory Journal Practices
6. Questions/Discussion
1. Huron, OSP, UGG

- Huron Report is available!
  vprnet.research.colostate.edu/VPR/huron-report/

- Pilot OSP/College Partnerships

- Uniform Grant Guidance Committee
2. Export Controls Update
Export Compliance Basics

- CSU Export Control Policy: Link
- Agencies: State, Commerce, Treasury, FBI, DHS
- Definitions: Export, Deemed Export, Re-export, Technology Control Plan, Export License, Fundamental Research
- Areas Affected: Research, Visiting Scientists and Students, International Travel and Shipping
- Actions: Educate, Advise, Screen, Protect Technology, Prior Authorization
Law Enforcement Examples

• Prof. John Reece Roth, University of Tennessee, **Four Years Prison**, Co-PI Barred from Receiving Federal Grants

• Univ. Massachusetts-Lowell, **$100K Penalty**: EAR99 to Pakistan Research Agency on Commerce/BIS Entity List

• Iowa State Student Wentong Cai, Recruited by Cousin in China, **Exported ITAR Sensors in Speakers**
Red Flags

- Publication Limits
- Nationality Restrictions
- Work outside the U.S.
- Sanctions and Denied Parties
- International Travel
- Requirement for Authorization Before Sharing Technology
Questions

• Export Control Administrator, Scot Allen, (970) 491-1563, scot.allen@colostate.edu
Backup Slides
FBI Academic Alliance

- College and University Security Effort – All 56 FBI offices establish dialogue with area universities
- National Security Higher Education Advisory Board – University administrators, FBI, other government agencies
- Support FBI priorities of Counterterrorism, Counterintelligence, Cyber Crime and support needs of universities
- Proactive, not reactive
Export and Sponsored Research

International Traffic in Arms Regulations (ITAR) – Military: Defense related articles and information used for military purposes such as: explosives, chemicals delivery systems, and biological agents; sponsored research from federal agencies or private contractors; found on United States Munitions List (USML)

Export Administration Regulations (EAR) – “Dual Use”: Regulates items designed for commercial purposes but also have military applications (computers, pathogens, civilian aircraft, etc.); covers goods, test equipment, materials and the software and technology; found on Commerce Control List (CCL); Each item has an export controls classification number (ECCN)

Economic Sanctions and Blocked Individuals: Office of Foreign Asset Control (OFAC) restricts trade with certain individuals/elements in particular countries, per U.S. foreign policy. U.S. citizens may also be restricted from certain transactions.

• “Deemed exports” (access to controlled technology and source code by a foreign national in the U.S.)
• Fundamental Research exclusion
International Travel and Shipping Recommendations:

- Follow CSU policies and procedures
- Use “clean” devices and email address
- Keep electronic devices with you
- Accessing internet in hotels, foreign wifi, etc. can be problematic
- Avoid compromising situations (drugs/alcohol/sexual items placed in your bags or given to you)
- Retain business cards following interactions
- **Do not** use non-university computers to log into university’s network
- **Do not** connect foreign electronic storage media to your phone or computer
- **Do** report stolen laptops to US Embassy or Consulate
- Change all passwords, including voice mail after return
- Report anything unusual to CSU and the FBI
Proactive Measures

• Use Available CSU Resources
• Report suspicious activities
• Know countries may target your technology and research
• Understand military or dual uses
• Prevent unnecessary access
• Be cautious in responding to requests for information
3. FDP and Cost Transfers
FDP Update

• NSF
  • Testing “Just In Time” submissions all in Directorate for Mathematical & Physical Sciences (MPS)
    • Division of Mathematical Sciences (DMS)
    • Division of Physics (PHY)
  • New PAPPG due out this Month Effective 1/25/16
    • 5pm submission deadline for all submissions
    • Final project reports due date changed from 90 days to 120 days.
  • Bio Sketches and Current & Pending Support may no longer be submitted as a single PDF file. To allow for automated compliance checking.
FDP Update

• NIH
  • Continued Transition towards Subaccounts October ‘15 – Sept ‘16
    • Competing Awards – All new funding into subaccounts
    • Type 3 Awards – Beginning Oct 1, 2015
    • Type 5 Awards – Beginning Oct 1, 2015
    • By September 30, 2016 – All awards transitioned to subaccounts.
  • NOT-OD-15-017 NIH Implementation of Dual Use Research of Concern (DURC)
  • NOT-OD-15-091 Publication Reporting Instructions for RPPRs and Renewal Applications
FDP Update

• Other Agencies / Info
  • Micro Purchase Threshold of $3,000 was delayed for another year.
  • Research Terms and Conditions - 9 Funding Agencies participating
    • NIH, NSF, Agriculture (NIFA), Commerce (NIST/NOAA), Energy, Homeland Security, Transportation (FAA), EPA, NASA.
  • RTC documents have gone through Interagency Working groups. Presented to the Committee on Science (9/21/15)
  • October 14, 2015 RTC hit the Federal Register
  • Can now begin working on revised RTC
Cost Transfers
Federal Cost Principles

• **Reasonable** – When a cost is necessary for the performance of the sponsored project.

• **Allowable** - When the cost is permitted according to the terms and condition of the specific award, CSU policies and federal regulations.
  - Previously covered under OMG Circulars A-21, A-110 and A-133
  - As of 12/26/2014 under Uniform Guidance

• **Allocable** - When the cost provides a sole benefit to the project; or benefits the project and other work in proportions that can be readily estimated.

• **Other items to be concerned with:**
  - Need appropriate back up detail on the item(s) of cost. (Auditability)
  - Cost needs to happen during the period of performance. (Timing)
  - Costs need to be treated consistently – (i.e. as a Direct Cost or as an Indirect Cost)
Cost Transfers on Federal Projects

• Federal auditors carefully examine and often strongly criticize after the fact transfer of costs made by universities.
• Mainly focused on Allocability OMB Uniform Guidance, 200.405(c) states:

  “Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons. However, this prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.”
Cost Transfers on Federal Projects

• It is important that each correcting entry be processed promptly after the discovery of the respective error.

• Transfers involving federally funded projects must be submitted within 90 days following the recording of the original charge.

• Excessive transfer of costs among projects is viewed as an indication that project management is less than adequate.

• Transfers made at project completion raise a flag to auditors that transfers are being made to (1) move over-expenditures to another account, or (2) to utilize excess funds remaining.
Cost Transfers on Federal Projects

Covered at CSU by the following:

• PI Manual Section IX, Cost Transfers

• Business and Finance Financial Procedure Instructions (FPI) 1-5 Journal Entry Corrections
4. Research Administration and Foundation Relations
Foundation Relations

• Program of Central University Advancement

• Staff:
  • Peter Hartman, Director
  • Sam Ernst, Assistant Director

• Goals:
  • Work with campus partners to build strong and productive long-term relationships with ALL private foundations
  • Build knowledge and capacity across CSU for private foundation fundraising
  • Maximize return for the university
  • Minimize wasted effort
Foundation Relations Roles

Active role varies depending on numerous factors:

• Size of opportunity, priority of funder, university priorities
• Managed sponsors vs. other foundations
• Family foundations vs. staffed foundations
• “Gifts” vs. Sponsored grants
• Pre- and Post-Award

In any scenario, we are here to help!
Current Initiatives

• One-stop portal for faculty seeking external funding.
• System improvements for work flow.
• Early career investigator portal.
• Overhead guidance.
• Process improvements for limited submission process.
• Joint strategy development and outreach.
• Professional development.
• Campus advisory committee for process improvements.
5. Research Publications
Predatory Publishers

- Open Access Journals – who can you trust?
- Black-listed journals/publishers (Beall)
- Based on COPE standards
  - Editor & Staff
  - Business management
  - Integrity
  - Re-publications
  - Poor journal standards
- Check with P&T committee members if in doubt about a venue
Reputation Protection

- iThenticate.com
  - When submitting team-authored papers
- RetractionWatch.com
- PubPeer.com
  - Uncertain about your publications
  - Entering into a collaboration
  - Hiring a postdoc
  - Going into a new lab/department
6. Questions