



FOCUS ON RESEARCH

Fall 2010 Newsletter

Office of Research Administration

Our Mission

The Office of Research Administration provides support to University faculty and staff in identifying funding opportunities, assisting with proposal development and the financial administration of awards in support of the University's scholarly activity and research mission.

In This Issue

[Reminders: Acknowledge Sponsors, If You Delegate Purchasing, Confirming Cost Share Commitments](#)

[New Facilities & Administrative Cost Rate](#)

[Responsible Conduct of Research Training: New for NIH & NSF](#)

[Resources: Institutional Data Sets](#)

[UMass Dartmouth Awards Update: FY 2010](#)

[Institutional Compliance Update: Export Control](#)

Reminders

Sponsor Acknowledgment

Just about all sponsors require that they be acknowledged in publications resulting from the work they funded. Please remember to do so. If you have any questions regarding this requirement please contact ORA. This requirement is audited during the audit of federal awards each year.

Delegating Purchasing Approval

Many PIs have delegated purchasing responsibility to others in their departments or labs. This delegation must be in writing. If you have given blanket authority to someone else to purchase through procard or to place online orders and to approve online orders please put this approval in writing and send to ORA. The notice to ORA may be in the form of an email directly from the PI. If you wish to make any changes to the approval process of your online requisitions please contact the purchasing department. Such formal approval delegation is also part of the audit of federal awards. If someone that you have not given formal approval to place an order does on an occasional basis then you need to sign the paper copy of the requisition.

Proposals Requiring Cost Share

If your project requires cost share or match, complete the [Cost Share Approval Form](#) now available on the ORA website. This new form captures the information ORA needs to track your cost share including a speed type for the cost shared-expense and an approval signature from the person responsible for the speed type. The Cost Share Approval Form must be complete at the time of proposal submission.

ORA Website Updated! The [ORA website](#) has been updated with revised proposal and award management guidelines as well as [Forms](#) for internal paperwork, re-budgets and cost transfer. The [Institutional Information](#) page is particularly useful as you prepare proposals for submission.

Facilities & Administrative Costs and Base Changes as of July 1, 2010

Facilities & Administrative Letter 2010-2012

Facilities and Administrative (F&A) cost rates are applicable to all sponsored projects, i.e. grants, contracts, cooperative agreements, subgrants and subcontracts funded by Federal, state or private sponsors. F&A is not charged for internal competitions within the UMass System. Charging F&A to external grants allows the University to recover costs associated with externally funded activities that cannot be identified specifically with a particular project or activity. They include costs for facilities, utilities and libraries; Purchasing, Human Resources and other administrative departments; and Registrar, Advising and other student services departments.

Grant announcements may refer to indirect costs rather than F&A.

The University's rate is determined by the U.S. Health and Human Services Agency through a review of University costs every three years.

As of July 1, 2010 the F&A cost rate changed from a single, on-campus rate based on Salaries and Wages to a variable rate depending on activity, based on Total Modified Direct Cost.

New Base: Total Modified Direct Cost

Total Modified Direct Cost includes all direct costs including salaries and wages, fringe benefits, travel, materials and supplies, consulting services, the first \$25,000 of each subcontract (regardless of its duration), publication fees and other direct costs.

Excluded from Base:

Excluded from the base are:

- capital expenditures
- equipment
- charges for patient care
- tuition remission
- rental costs of off-site facilities
- scholarships and fellowships
- portion of each subcontract over \$25,000

Equipment is defined as tangible personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Curriculum Support Fees, considered tuition remission, are excluded from the indirect cost base. Off-site facility rental includes office, lab, and instructional space, but not core facility recharges or sea-time.

When Sponsor Limits F&A Charges

The first step to determine the appropriate rate is to read the sponsor's program guidelines. If there is a limit on F&A, the guidelines will give a rate to be used and whether the base is direct cost or total cost. For example the U.S. Department of Education limits training grants to an

indirect rate of 8% of direct costs, excluding training stipend. Many U.S. Department of Agriculture grants limit indirect to 22% of the total costs (28.2% of direct costs). If the guidelines do not mention F&A or give a restricted rate, then the full F&A cost rate should be used. UMass Dartmouth must be consistent in the way it applies costs to grants, so the federal rates are used for all grants, whether the sponsor is public or private, non-profit or commercial.

Rates Vary by Activity

The next step is to determine the applicable rate depending on the proposal activity. The University's rate for research is 56%, for instruction is 66%, and for other sponsored activity is 44%.

Instruction - 66%

Instruction means the teaching and training activities of the University, whether they are offered for credit toward a degree or certificate or on a non-credit basis and whether they are offered through regular academic departments or Professional and Continuing Education. Any proposal involving registered students who are not involved in research, most likely falls under this rate. Curriculum development projects, regardless of whether they include classroom implementation, are considered Instructional activities. Academic support programs, such as tutoring, College Now, Upward Bound, also fall under this rate.

Research - 56%

Research means inquiry, experimentation and investigation to increase scholarly understanding. It includes data collection, evaluation, analysis and reporting, including writing books to publish research results. It also includes training students in research techniques if this is offered outside of Instructional function.

Other Sponsored Activities - 44%

Other Sponsored Activities means projects that do not involve Research or Instruction such as community service programs that do not carry academic credit, health service projects, workshops, conferences and training that do not involve registered students, development of library collections, programs to enhance institutional resources including technology, travel and support for public events.

On or Off Campus? Off Campus Rate - 26%

The vast majority of sponsored project activity at UMass Dartmouth is considered on-campus. Off campus activities take place in facilities not owned by UMass Dartmouth and for which rent will be paid. UMass Dartmouth facilities in New Bedford, Fairhaven and the ATMC are on-campus locations. Field work alone, even if it represents a significant cost in the project budget, does not qualify a proposal for the off-campus rate. Grants and contracts are not subject to more than one rate. If more than 50% of the activity will take place at the off-campus location, then the off-campus rate applies to the entire proposal.

Rates for Continuing Awards

Rates for continuing awards will continue under the prior rate of 64% of salaries and wages.

Where Does F&A Cost Go?

F&A cost is returned to the University to cover expenses that cannot be specifically identified with projects. The University creates a distribution schedule for F&A costs. F&A for the majority of awards is distributed: 55% to the Provost for operations costs, 5% to the Libraries, 15% to the School or College Dean's Office, 10% to the Department and 15% to the Principal Investigator. PIs may use the funds in their F&A costs accounts for expenses allowed by the University.

Questions?

If you have any question about what rate to apply please contact Mary or Michelle in ORA before you begin building your budget.

Responsible Conduct of Research Training Requirements

Responsible Conduct of Research (RCR) ensures that research is conducted effectively, objectively and without the appearance of improper influence. It goes beyond clear misconduct of falsification, fabrication and plagiarism to include awareness and application of ethical principles and professional norms.

NIH RCR Requirement

NSF RCR Requirement

In 2010 both NIH and NSF adopted requirements for training students and post doctoral fellows in responsible conduct of research as part of conditions of grant funding. The agencies' requirements are different and are summarized below. If you are proposing any NSF grant or NIH training grant, please use the sidebar links to be sure you are familiar with the requirements.

To meet NSF RCR requirements, the University will be offering fundamental training for all students and post docs working on research projects through the Collaborative Institutional Training Initiative [CITI](#). CITI also has training modules for research with human and animal subjects. For more information please visit UMass Dartmouth's [Institutional Compliance website](#).

National Institutes of Health

NIH defines Responsible Conduct of Research as the practice of scientific investigation with integrity. NIH is specific about who should participate in RCR training, how often instruction should occur, and the form that instruction should take.

Institutional Research Training Grant Awards

However these requirements apply only to NIH programs associated with training, listed in the sidebar.

Individual Fellowship Awards

Proposals to these grant programs must include a plan for Responsible Conduct of Research Training. The plan will not be considered in rating the grant, but it will be graded acceptable or unacceptable (according to criteria in notice) and projects will not be funded without submission of an acceptable plan. Continuation proposals must include a report on RCR training to date.

Career Development Awards (Institutional and Individual)

Research Education Grants (with some exceptions)

NIH calls for instruction appropriate to the career stage of the individuals receiving training. Instruction should be taken at least once at each career stage and at least once every four years.

Dissertation Research Grant Awards

Faculty members are encouraged to participate in ways that allow them to serve as effective role models for their trainees, fellows, and scholars. Informal instruction may occur throughout the year in the course of laboratory interactions and other informal discussions. Formal instruction may be offered with faculty contributing as discussion leaders, speakers, lecturers, and/or course directors. Instruction must include face-to-face discussions by RCR course participants and faculty. Acceptable programs generally involve at least eight contact hours. On-line instruction may be a component of instruction in responsible conduct of research but is not sufficient to meet the NIH requirement, except in special or unusual circumstances.

Other awards with a training component that requires RCR instruction in the Funding Opportunity Announcement

NIH does not specify content requirements, but the following topics have been incorporated into most acceptable plans:

- conflict of interest – personal, professional, and financial
- policies regarding human subjects, live vertebrate animal subjects in research, and safe laboratory practices
- mentor/mentee responsibilities and relationships
- collaborative research including collaborations with industry
- peer review
- data acquisition and laboratory tools; management, sharing and ownership
- research misconduct and policies for handling misconduct
- responsible authorship and publication
- the scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research

National Science Foundation

NSF's Responsible Conduct of Research requirements apply to all grants, not only to training grants. Unlike NIH, NSF requires an institutional plan for RCR training, not an individual plan for each proposal. NSF leaves the choice of content and delivery method to the institution, but the University is required to designate one or more persons to oversee compliance with these requirements and verify that undergraduate and graduate students and post doctoral fellows have received the training.

The plan must be in place at time of proposal submission and is required for proposals submitted on or after January 4, 2010. The plan is not submitted with the application but is subject to review on request.

Resources for RCR Training

Even before the new requirements were issued there was interest in RCR training which has spawned a plethora of resources. A few are given here:

- NSF-funded [Ethics Library](#) clearinghouse managed by UMass Amherst that offers resources on every topic across disciplinary fields, including the social sciences and arts.
- UC Davis, with funding from US Office of Research Integrity, has produced a series of [RCR videos](#) with dramatized situations as starting points for discussion.
- Other videos are available at [University Nebraska at Lincoln](#) produced with funding from NSF and the Council on Graduate Studies.
- Online Ethics Center for Engineering and Research from the National Academy of Engineering offers [case studies and role plays](#).

Resources: UMD Institutional Data Set

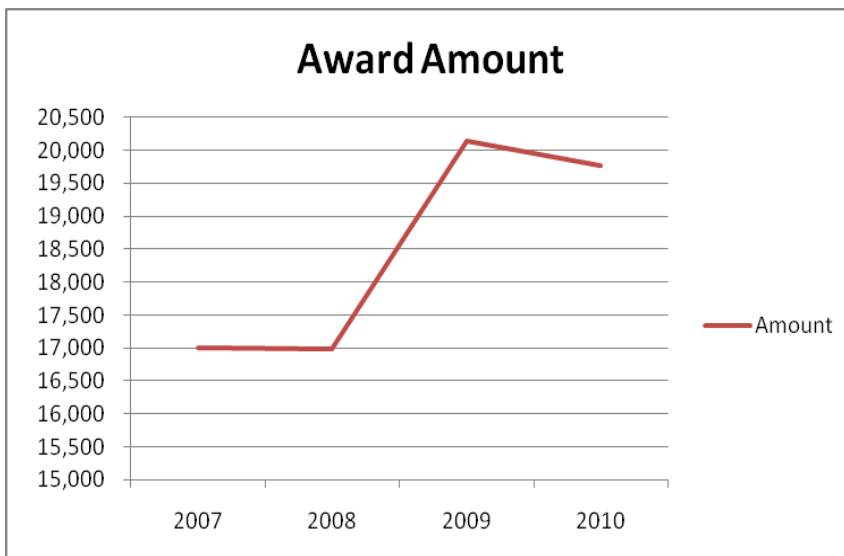
Do you need to know how many graduate students enroll part time, the freshmen retention rate, or the percent of women applicants admitted in a given year? The [Institutional Data Set](#), available on the Institutional Research website is an invaluable resource when you are describing the UMass Dartmouth student population.

UMass Dartmouth Awards Update: FY 2010

These award figures include all awards received through sponsored projects including public service and training as well as research. The value of awards received during a given period is determined by the amount of funding released by the sponsoring agency. This amount may be different than the actual total award amount if funding is released incrementally.

FY 10 Awards Received

After a 19% jump from FY 2008 to FY 2009, external funding in the form of new or continuing grants and contracts received by the University of Massachusetts Dartmouth decreased slightly by 2.6% from \$20.1 Million in FY09 to \$19.6 Million in FY10. These awards include Research, Training/Instruction and Other Sponsored Activities.



Institutional Compliance:

Export Controls

Useful Links:

[Fundamental Research Exclusions under the Export Administration Regulations - EAR](#)

[International Traffic in Arms Regulations - ITAR](#)

UMass Dartmouth policy is to comply fully with export control and trade sanctions laws and regulations. The Office of Institutional Compliance oversees export controls and trade sanctions compliance.

It is also the mission and policy of UMass Dartmouth to conduct instruction and research openly and without prohibitions on the dissemination of learning or research results. As a result, in most instances the requirements of U.S. export control laws can be appropriately satisfied through reliance on available exclusions, such as exclusions for educational information, and information that is publicly available or in the public domain.

Chief among these are the fundamental research exclusions (FRE) under the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR). Fundamental research is basic or applied research in science and engineering, the results of which are ordinarily published and shared broadly within the scientific community. Restrictions on the publication of research results and personnel access

restrictions can invalidate the fundamental research exclusion. Furthermore, the FRE does not provide an exclusion for the physical export of goods or materials (even where FRE applies to the research).

Export controls may also apply to the disclosure of certain kinds of information and the provision of certain kinds of services to foreign nationals inside the United States (“deemed exports”). An export license may be required before initiating these activities.

Furthermore, UMass Dartmouth demands strict compliance with the Office of Foreign Assets Control (OFAC) regulations governing transactions with embargoed countries and prohibited entities and individuals. A license from OFAC may be required for certain transactions. For the most current information on export control and trade sanctions regulations, see [EAR](#), [ITAR](#) and [OFAC](#).

You are responsible for securing the research and technology, chemicals and biological materials that you handle, as well as protecting proprietary and Government articles entrusted to you against unauthorized use or theft. You are responsible for screening any potential foreign research collaborator and foreign visitor against “Lists to Check” to ensure that person is not embargoed or sanctioned and to ensure the proposed end use is appropriate.

Faculty, administrators, and staff should contact Andrew Karberg, Director of Institutional Compliance when they have any questions about the application of U.S. export controls or trade sanctions to their research or other activities. Faculty, administrators, and staff should report any potential violations to the Office of Institutional Compliance

Willful and knowing violation of ITAR, EAR, or OFAC is a criminal offense. Significant civil penalties can apply even to accidental or innocent violations.

Credits

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