10 Most Common Submission Mistakes & How to Avoid Them

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Objectives

- To discuss the common mistakes during submissions both from the perspective of the department and the central pre-award offices.
- To discuss ways to avoid these common mistakes.
- To discuss the categories of Return for Changes.
- Tips for participants on how to handle the last minute changes for submissions
Read the Instructions

– Department not reading instructions thoroughly
– Department misinterpreting the instructions
– Department assuming the previous submission is the same as the current submission

– Ways to Avoid the Mistake:
  • Start early with your submissions
  • Ask Questions
  • Contact ORA/ORS with questions

Waiting for Someone Else

– Department gets behind and submits late waiting on other departments
– Not Knowing Due Dates of other Internal Duke Departments

– Ways to Avoid the Mistake:
  • Start early with your submissions
  • Ask Questions
  • Pay attention to other department deadlines
  • Use effective communication and notify departments of expectations and deadlines
Last-Minute Submissions

– PI Rushing
– Missing Information
– Contacted by another PI/Dept. too late causing the late submission

– Ways to Avoid the Mistake:
  • Prepare as early as possible
  • Stay Positive
  • Utilize Checklists to ensure all information is captured and correct

Budget & Budget Justification Don’t Match

– Changing the budget and not updating the justification, and vice versa
– Business Mgr./Dept. Approver not reviewing the application before approving

– Ways to Avoid the Mistake:
  • Print the application prior to approving
  • Business Mgr./Dept. Approver reviewing record prior to approving the SPS record
  • Don’t update one without updating the other
Cost-Share Forms/Rules

– SOM/SON do not require use of the Cost-Sharing Form
– SOM/SON does not have a clear process for the Cost-Sharing
– Form is required for Campus before SPS Record can be approved

– Ways to Avoid the Mistake:
  • Follow your department’s procedures
  • Effective training
  • Ask Questions

F&A Waivers and Rates

– Department not familiar with when a waiver should be requested
– Department using the wrong rates

– Ways to Avoid the Mistake:
  • Understand the F&A Waiver Policy
  • Understand which F&A Rate To Use
  • Contact ORA/ORS when you are unsure
SOM/SON Waivers & Rates Con’t.

Q. When is a F&A/IDC rate waiver approval required from Billy Newton?
A. When there is no stated F&A/IDC rate identified in the funding announcement/application instructions or application website.

Q. What information should I submit to Billy Newton when requesting a F&A/IDC Waiver?
A. The reason for the request, the budget amount (annually and total project), and any documentation you have from the sponsor concerning their policy on F&A/IDC.

SOM/SON Waivers & Rates Con’t.

Q. Billy Newton approved a waiver for this project in 1996, why are you asking us to get a waiver again this year?
A. Waivers granted are only for the current "project period” of the grant, NOT for the entire life of the project and must be approved at the beginning of each new project period.

Q. If we get a waiver from Billy Newton, is that good for all applications from that particular sponsor?
A. No, the waiver is granted on a project by project basis not sponsor by sponsor.
Campus F&A Waiver & Rates

• It is the University's policy to require the inclusion of full F&A cost recovery on all proposals for external funding, except gifts. Unless a sponsor has a published policy requiring a lower F&A rate or disallowing F&A, deviation from this policy is not permitted without special approval from the Vice Provost for Research.

• If a sponsor does not have a published rate, certification of their limitation may be made using the F&A Rate Limit and Waiver form.
FCOI & Investigator Checkbox in SPS

– Department not asking the PI
– PI not knowing the definition of “investigator”
– Department not aware of FCOI process
– Ways to Avoid the Mistake:
  • Understand the definition of Investigator
    – (FCOI) Presentation - NIH - National Institutes of Health
  • Explain to the PI importance
  • Mark in SPS under “Inv” column if subrecipient or consultant fall under the definition of investigator

Definition of Investigator

Investigator is defined as the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research.

Source: NIH Financial Conflict of Interest (FCOI) presentation
Definition of Key Personnel

The program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation.

Source: [http://grants.nih.gov/grants/policy/senior_key_personnel_faqs.htm#1658](http://grants.nih.gov/grants/policy/senior_key_personnel_faqs.htm#1658)

IRB/IACUC

– Department unaware of IRB/IACUC meanings
– Department unaware of concordance/approvals
– Ways to Avoid the Mistake:
  • Ask Questions and communicate with the PI
  • Duke IACUC
    – [http://vetmed.duhs.duke.edu/IACUC.html](http://vetmed.duhs.duke.edu/IACUC.html)
  • Duke IRB
DPAF

- DPAF (Duke Proposal Approval Form)
  - DPAF not signed by PI
  - DPAF not dated by PI
  - DPAF not marked “Yes” or “No”
  - DPAF not attached in SPS Record
- Ways to Avoid the Mistake:
  - Create a checklist to remind you to complete and attach the form

Salary Forms

- Department not using Salary Form
- Department not returning the Salary Form in a timely manner
- Ways to Avoid the Mistake:
  - Complete the form for EVERY person
  - Submit to Department early enough
  - Follow-up with department if you have not gotten a response in a timely manner.
  - Campus SPOC List
    - https://ors.duke.edu/sites/default/files/SPOCLlist.pdf
  - SOM/SON SPOC List
Return for Changes (RFC)

- **Objective/Purpose:**
  - To substantiate the quality of data received by the Office of Research Administration (ORA) pertaining to the preparation and the submission of applications and/or proposals ensuring with reasonable efforts that Duke University is presenting a high quality submission package encompassing, both the scientific and the administrative aspects when seeking extramural funding on behalf of Duke University.
Return For Changes (RFC)

- **Five Categories for RFC:**
  - DPAF
  - Documents
  - Budget
  - Budget Justification
  - Compliance

DPAF (Duke Proposal Approval Form)

- **Duke Proposal Approval Form (DPAF)**
  - not signed OR
  - not dated OR
  - COI not addressed -(Marked “Yes” or “No”) OR
  - form is not attached to SPS Internal documentation
Documents

- Guidance regarding documents are derived from Sponsor’s guidelines and/or as indicated via Duke policies and if appropriate attached in SPS Internal Documentation:
  - Subawards/Consortiums
    - PHS 398 Signed Face Page
    - Checklist
    - Budget
    - Budget Justification
    - FCOI
  - Electronic Packets
    - Agency/Sponsor Applications including the signature page or face page, and budget information

Budget

- Amounts over/under allowable
  - Amounts should be in accordance with the guidelines or Notice of Grant Award for non-competing renewals
- Mis-categorized costs
  - Items that are not allowable per the sponsor guidelines/instructions
  - Items correct in SPS, but not transferred correctly to budget page(s)
- Examples of Budget RFCs (not all inclusive) are:
  - NIH Salary Cap and appropriate cost-sharing incorrect
  - Tuition Remission not included or calculated incorrectly
  - Consultants listed incorrectly
  - Stipend amounts listed incorrectly
  - Incorrect F&A rate used or waiver documentation not included or provided
Budget Justification

• **Mis-matched with budget (Not Inclusive)**
  – Calendar months don’t match budget, or are not listed
  – Project roles different than budget
  – Personnel not listed correctly
  – Categorical amounts match (e.g., supplies, other expenses)

• **Missing information (Not Inclusive)**
  – NIH Salary cap statement
  – MOU statement missing
  – PDC statement missing
  – Person listed in budget, but not in budget justification

Compliance

• **Incorrect or missing items related to**
  – IRB - if or when applicable
  – IACUC - if or when applicable
  – IBC - if or when applicable
  – Human Subjects Training - if or when applicable
  – Other Support - if or when applicable
Questions???