

# Symposium for Research Administrators

Dynamics for Tomorrow's Research Administration



## 10 Most Common Submission Mistakes & How to Avoid Them

Panel: Adam Kuehn, Laurianne Torres,  
Gwendolyn Wright, Denise Wynn

### 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



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## 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

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## 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

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# 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

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# 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

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## 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



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## 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



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## 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.



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## 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.



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# 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.

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# Campus F&A Waiver Form

<b>Duke</b> OFFICE OF RESEARCH SUPPORT	Indirect Cost Limitation
<b>PART A - TO BE COMPLETED BY SPONSOR</b>	
SPONSOR NAME: _____	
ALLOWED F&A INDIRECT COST RATE: _____	
IS THERE A PRIME SPONSOR: YES <input type="checkbox"/> NO <input type="checkbox"/> IF YES, WHO IS THE PRIME SPONSOR: _____	
WHAT IS THE ALLOWED F&A INDIRECT COST RATE OF THE PRIME SPONSOR: _____	
DO YOU HAVE A WRITTEN POLICY LIMITING INDIRECT COSTS: YES <input type="checkbox"/> NO <input type="checkbox"/>	
IF YES, PLEASE EITHER ATTACH A COPY OF THE POLICY OR INDICATE THE URL WHERE THE POLICY MAY BE FOUND: _____	
IF NO, PLEASE JUSTIFY THE LIMITATION OF INDIRECT COSTS _____	
As an Authorized Official of the above named organization, I certify that all the information above is accurate and that our policy limiting indirect costs is applied to all activities sponsored by our organization. I further certify that I have the authority to sign contractual documents on behalf of the organization.	
Signature: _____	Date: _____
Name and Title of Authorized Official: _____	
<b>PART B - TO BE COMPLETED BY DUKE UNIVERSITY DEPT/SCHOOL/INSTITUTE/CENTER IF THE SPONSOR DOES NOT HAVE A WRITTEN POLICY</b>	
PRINCIPAL INVESTIGATOR: _____	
PROJECT TITLE: _____	
SPS NUMBER: _____	
JUSTIFICATION FOR ACCEPTING LIMITED F&A INDIRECT COSTS ON THIS PROJECT: _____	

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## 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

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## 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](#)

Last Name (C)	First Name	Duke Org	Key	OSC	Inv	VA	Project Role	PI/Co-PI Role
Nixon	Debera H.	Information Technology	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PI	PI
Huka Owen	Keith P.	Office of Research Support	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Investigator	Co-PI
TBD			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Laboratory Technician	
Barbee	Amy C.	Information Technology	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Consultant	
Drysdale	Marianne C.	Information Technology	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Co Investigator	

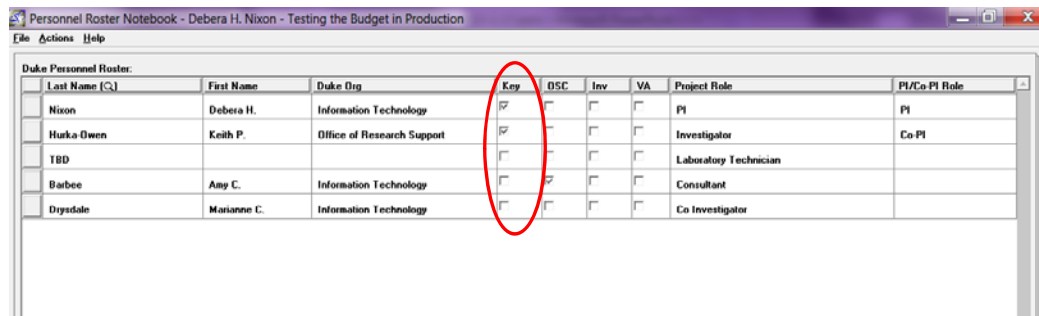
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# Definition of Key Personnel

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)



Last Name (L)	First Name	Duke Org	Key	OSC	Inv	VA	Project Role	PI/Co-PI Role
Nixon	Debera H.	Information Technology	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PI	PI
Hurka Owen	Keith P.	Office of Research Support	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Investigator	Co PI
TBD			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Laboratory Technician	
Barbee	Amy C.	Information Technology	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consultant	
Drysdale	Marianne C.	Information Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Co Investigator	

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# 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>
  - Duke IRB
    - <http://irb.duhs.duke.edu/>

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# 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

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# 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/SPOCList.pdf>
  - SOM/SON SPOC List
    - <http://research.som.duke.edu/sites/research.som.duke.edu/files/documents/Salary%20SPOCs%209.24.13.pdf>

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# RETURN FOR CHANGES FOR SCHOOL OF MEDICINE

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## 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

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## Return For Changes (RFC)

- **Five Categories for RFC:**

- DPAF
- Documents
- Budget
- Budget Justification
- Compliance



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## 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



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## 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

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## 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

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## 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???



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