Agenda – Day Four

- Research Misconduct & Compliance
- Faculty Salary Planning
- Compensation: Personal Services & Effort Reporting
- Office of Research Development
- Office of Foundation Relations
- Corporate Engagement
- NUIT Administrative Systems
Research Misconduct & Compliance

Michelle Stalilonis
Senior Compliance Specialist
Office for Research Integrity
m-stalilonis@northwestern.edu
What is Research Misconduct?

• Fabrication
• Falsification
• Plagiarism

http://www.research.northwestern.edu/ori/misconduct/
Research Misconduct

Fabrication & Falsification
- Reporting experiments, measurements or other statistical analysis never performed
- Manipulating or altering data
- Selective reporting

Plagiarism
- Representing another's work as one's own
Do you have research administration or compliance concerns and don’t know who to call?

Contact the Office for Research Integrity (ORI) at nuy-ori@northwestern.edu or (312) 503-0054. ORI will assist you or direct you to the appropriate unit or individual who can assist you.

For Any Research-Related Concerns, including Research Misconduct

- Contact the Office for Research Integrity; or
- Contact your supervisor, department chair or dean; or
- Report concerns anonymously via Ethics Point. Northwestern University has contracted with Ethics Point, a third party vendor, that will allow you to report concerns anonymously online or by dialing (866) 294-3546.

Specific Research Compliance Areas

Consult the University’s Research Ethics and Compliance Page to identify contacts for other specific research concerns:

- Animal and Human Subjects
- Grant Management/Misappropriation of Cost
- Falsification of Research Effort

The Office for Research Integrity can also be contacted for any of the above listed issues.

Non-Retaliation

Northwestern policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or for seeking guidance on how to handle suspected breaches. The identity of confidential sources will be protected to the extent consistent with the needs of an inquiry or investigation. Those individuals who provide information in good faith about questionable conduct will be protected against reprisals.

Northwestern also has specific whistleblower protections to comply with American Recovery and Reinvestment Act of 2009 (ARRA) awards.
Research Data: Ownership, Retention and Access

• University Policy: http://www.research.northwestern.edu/policies/documents/research_data.pdf

• Defines “research data”
• Defines University and PI responsibilities
• Transfer to data when researcher leaves institution

• Data retained for minimum of 3 years after the financial report for the project has been submitted unless longer periods are required
Fiduciary Duty

• Fiscal Fiduciary Duty:
  – Northwestern University, faculty and staff have a duty to ensure research funding is spent as intended
  – Funding agencies have to rely on institutional and personal integrity
  – Rules and regulations provide us with parameters
  – Regulations will always be a part of research
Penalties for Non-compliance

Institutional:
• Fines and penalties
• Exceptional status
• Funding reduction

Personal:
• Criminal/civil sanctions
• Suspension and debarment
• Professional integrity compromised
## Recent Examples of the Impact of Non-compliance

<table>
<thead>
<tr>
<th>Institution</th>
<th>Settlement Time Frame</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Ohio State University</td>
<td>March 2011</td>
<td>• Auditors reviewed costs on 3 awards and questioned $1.7 of $22.5 million in costs. Auditors found compliance issues in subrecipient monitoring, cost sharing, effort reporting, and participant support costs.</td>
</tr>
<tr>
<td>Dartmouth College</td>
<td>October 2010</td>
<td>• $275,000 settlement and $604,000 in contract funds returned to the government for contract pricing and cost recovery issues, lack of compliance with Federal Acquisition Regulation (FAR), and Conflict of Interest issues.</td>
</tr>
<tr>
<td>Yale University</td>
<td>December 2008</td>
<td>• $7.6 million settlement for inadequate documentation of cost transfers and summer salary charges wrongly charged to federal grants.</td>
</tr>
<tr>
<td>Cornell University’s Weill Medical College</td>
<td>Fall 2007</td>
<td>• $2.6 million settlement for a PI failing to disclose on grant applications to the NIH the full extent of various active research projects.</td>
</tr>
<tr>
<td>University of Connecticut</td>
<td>January 2006</td>
<td>• $2.5 million penalty for overstating anticipated expenses, overcharging the government, and billing for items not covered by grants; Cost sharing issues.</td>
</tr>
<tr>
<td>Northwestern University</td>
<td>February 2003</td>
<td>• $5.5 million penalty for over stating effort reporting on federal sponsored projects.</td>
</tr>
</tbody>
</table>
A part of Northwestern University’s commitment to ethics and compliance is to provide community members with the information needed to act appropriately. The University’s Standards for Business Conduct (SBC) provides a framework for administering University resources and establishes guidelines for acceptable standards of behavior.

If you have questions or concerns, following are links to contact people, phone numbers, e-mail addresses or web sites that may assist you in understanding Northwestern’s policies and procedures, as well as provide a process for voicing your concerns.

In addition to these resources, Northwestern has selected EthicsPoint to provide you with a simple way to report activities that may involve misconduct or violations of University policy. You may file a report here or by dialing 866-294-3545. This service is not a substitute for, nor does it supersede, any existing reporting methods or protocols already in place at Northwestern for reporting suspected problems or complaints. Instead, the EthicsPoint system provides an additional means of reporting such issues. Any suspected problems or complaints reported via EthicsPoint will be reviewed in accordance with current University procedures, including those described in the Faculty, Staff, or Student Handbooks. Northwestern policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or for seeking guidance on how to handle suspected breaches.
EthicsPoint: A Compliance Hotline

- Report potential misconduct or violations of policy:
  - (866)294-3545
  - www.northwestern.edu/ethics

- Any suspected problems will be reviewed according to University procedures

- Policy prohibits retaliatory action against those reporting

- Anonymous
To ask a question, receive guidance, or report a violation, contact a representative from the list below. All are trained and ready to help.

**Falsification of Research Effort**
**Controller’s Office**
Mike Daniels, Director
Call: 847-491-4710   Email: m-daniels2@northwestern.edu

**Grant Management**
**Office of Sponsored Research**
Kelly Morrison, Director, Evanston Campus
Call: (847) 467-3283   Email: kellym@northwestern.edu
Rex Chisholm, Associate Vice President for Research, Chicago Campus
Call: 312-503-1780   Email: OSR-Chicago@northwestern.edu
**Controller’s Office**
Mike Daniels, Director
Call: 847-491-4710   Email: m-daniels2@northwestern.edu

**Research Misconduct**
**Office for Research Integrity**
Lauran Qualkenbush, Director
Call: 312-503-0054   Email: nu-ori@northwestern.edu

**Research on Animals**
**Institutional Animal Care and Use Committee**
Mandy Kozlowski, Director of IACUC
Call: 312-503-0109   Email: m-kozlowski@northwestern.edu

**Research on Human Subjects**
**Institutional Review Board**
Eileen Yates, MS, CIP, Assistant Director
Call: (312) 503-6011   Email: eyates@northwestern.edu
How can *you* ensure compliance?

- We are all responsible
- Understand complex regulations
- Identify resources
- Know when and where to ask for help
- When in doubt, ask
Faculty Salary Planning

Deb Cundiff
Business Administrator
McCormick School of Engineering

Marsha McClellan
Director of Financial Management
Feinberg School of Medicine
What is Faculty Salary Planning?

- a.k.a. Direct charging
- Begins at the proposal stage
- Faculty must estimate how much time they will spend on the project (effort)
- Administrator uses effort to calculate the salary request from the sponsor
- PI provides the scientific leadership supporting the research
What is Salary Planning?

- Salary charging must adhere to the 4 basic cost principles per OMB Circular A-21:
  - Reasonableness
  - Allowability
  - Allocability
  - Consistency
Salary and wage amounts charged to grant-supported projects for personal services must be based on an adequate payroll distribution system that documents such distribution in accordance with applicable Federal Cost Principles and consistently applied institutional policy and practices.
Principles & Policies

• The NSF Proposal and Award Policies and Procedures Guide:

NSF limits salary compensation for senior project personnel to no more than two months of their regular salary in any one year. This limit includes salary compensation received from all NSF-funded grants. This effort must be documented in accordance with the applicable cost principles.
Key Principles

• Effort commitments should drive salary planning

• Cost sharing (including over the cap salary) must come from a non-sponsored source

• Identify cost sharing sources early

• Not all faculty activities come from extramural funding:
  – Instruction
  – Administration
  – Grant writing (usually…)

• PIs should generally not be 100% funded from sponsored projects, unless there is a sponsor exception
How is Salary Paid on the Evanston Campus?

- Tenure/tenure track faculty have 9 month academic year appointments
- May also have another appointment with a different contract period (i.e. 12 month)
- May receive up to 2.5 months of summer salary from sponsored projects
- Academic year: 9/16-6/15
- Summer period: 6/16-9/15
- Partial months of September & June will affect direct charge calculation
- Salary cap consideration
How is Salary Paid on the Evanston Campus?

- Salary is paid over 12 months regardless of appointment length

- On effort report, salary distribution must be restated to appropriately show earned amounts according to appointment

- Calculating the monthly earned rate is complicated
  - Northwestern has developed tools to help
Evanston: What is Academic Base Salary?

### 9-MONTH ACADEMIC & SUMMER SALARY CONSIDERATIONS FOR FACULTY WITH 9-MONTH APPOINTMENTS

<table>
<thead>
<tr>
<th>RCD</th>
<th>Annual Salary</th>
<th>Appt</th>
<th>Monthly Earned Rate</th>
<th>% Distribution</th>
<th>Summer Monthly Rate per Appointment</th>
<th>Note</th>
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<tbody>
<tr>
<td>0</td>
<td>100,000.00</td>
<td>9</td>
<td>11,111.11</td>
<td>92.31%</td>
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<tr>
<td>1</td>
<td>11,111.11</td>
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<td>525.36</td>
<td>7.68%</td>
<td>0.00</td>
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</tr>
<tr>
<td>2</td>
<td>0.00</td>
<td>12</td>
<td>0.00</td>
<td>0.00%</td>
<td>0.00</td>
<td>Not eligible for requesting summer salary</td>
</tr>
<tr>
<td>TL</td>
<td>111,111.11</td>
<td></td>
<td>12,037.04</td>
<td>100.00%</td>
<td>11,111.11</td>
<td></td>
</tr>
</tbody>
</table>

### Notes:

- For **NU administrative** appointments such as dean, chair, or division head, the salary **typically cannot** be charged to sponsored projects.
- This worksheet is for 9 and 12 months appointments only. 10 and 11 month appointments require additional considerations. Please contact Jennifer Wei if you need assistance for 10 or 11 months appointments.

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### Base Salary displayed on NU Effort Reports:

<table>
<thead>
<tr>
<th>Quarter</th>
<th># of Months</th>
<th>Base Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1 (09/16 - 11/30)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q2 (12/01 - 02/28)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q3 (03/01 - 05/15)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q4 (06/16 - 09/15)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Chicago Qtrs</td>
<td>3</td>
<td>36,111.11</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Quarter</th>
<th># of Months</th>
<th>Base Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1 (09/16 - 11/30)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q2 (12/01 - 02/28)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q3 (03/01 - 05/31)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
<tr>
<td>Q4 (06/01 - 08/31)</td>
<td>3</td>
<td>36,111.11</td>
</tr>
</tbody>
</table>

**Input Errors:**

**For NIH salary, appointments such as principal investigator or principal investigator, the salary may be charged to sponsored projects.**

**Summer salary charges must be in compliance with NU's Summer Research Quarter Salary and Effort Reporting policies. A pre-cert form is required if charging more than 2.5 months salary to sponsored projects.**

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**Salary Planning**
How is Salary Paid on the Chicago Campus?

• Clinical faculty (MDs) have 12 month appointments

• Most Ph.D./investigator track/tenure eligible faculty have 12 month appointments except for a few that elected to remain with 9 month appointments or have joint appointments with an Evanston school

• Institutional base salary (& effort) includes both NU & NMG
• 12 month academic year: 9/1-8/31

• 9 month Academic year: 9/1-5/31
  – Summer Quarter: 6/1-8/31
• Salary cap
Cost Sharing

• Cost sharing occurs when a cost specifically benefits a sponsored project but is not charged to that project.

• Can be mandatory (salary or non-salary), over the cap cost sharing or voluntary committed cost sharing (salary and non-salary). Most common type of cost sharing on the Chicago campus is the NIH statutory cap and the salary limitation on NIH career (K) awards.
Cost Sharing Model Changes

• As of 9/1/13, cost sharing changed to a model that illustrates mandatory vs. voluntary committed cost sharing with addition of 193 fund. Allows departments to more effectively manage the cash commitments associated with voluntary committed cost. These funds function as follows:

• **191:** Used exclusively for mandatory cost sharing (salary and non-salary). A budget is established on an annual basis.

• **192:** Used exclusively for over-the-cap cost sharing. No budget established.

• **193:** Used exclusively for voluntary committed cost sharing (salary and non-salary). A budget is established on an annual basis.
## Cost Sharing Model Changes - Cont.

<table>
<thead>
<tr>
<th>Previous Model</th>
<th>New Model as of 9/1/13</th>
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<tbody>
<tr>
<td><strong>191</strong></td>
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</tr>
<tr>
<td>Mandatory (Salary &amp; Non-Salary)</td>
<td>Mandatory (Salary &amp; Non-Salary)</td>
</tr>
<tr>
<td>Voluntary Committed (Non-Salary)</td>
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</tr>
<tr>
<td><strong>192</strong></td>
<td></td>
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<tr>
<td>Voluntary Committed (Salary) Over-the-Cap</td>
<td>Over-the-Cap</td>
</tr>
<tr>
<td><strong>193</strong></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>Voluntary Committed (Salary &amp; Non-Salary)</td>
</tr>
</tbody>
</table>
NIH Salary Cap

• Some sponsors put a limit on the amount of salary that can be charged to federal awards
  – e.g. NIH salary cap as of 1/10/2016 is $185,100 or $15,425 per month for 12 month appointments

  – For 9 month appointments, the cap is $138,825
Research/Summer Quarter (Summer Salary)

- Research/Summer quarter payments are made using the Summer/Research Quarter Salary Request Form (not through deployment in FASIS)

www.northwestern.edu/hr/payroll/administratorpayments.html
Why is Direct Charging Important?

• Aligns salary expenses to effort commitments on sponsored projects
• Helps achieve compliance
• Utilizes available outside funding sources to cover salary expenses
• Supports all funds budgeting
• Reduces paperwork
• Increases accounting transparency
• Voluntary cost sharing occurs when committed salaries are not charged to awards; the effect is reducing the indirect cost rate
• Requires prospective planning of expense posting based on commitments
Why Faculty Might Not Direct Charge in Evanston Schools

- The base academic salary is guaranteed by the faculty members’ Dean’s Office
  - Faculty might prefer to utilize the awarded research dollars for other charges to grants
- Some sponsors have salary caps
- Some limit salary charges to a specific number of months
- Some discourage academic year salary/benefit charges to grant budgets entirely
- It is critical to have an understanding of what each sponsor permits
- In contrast, on the Chicago campus, all faculty direct charge their salaries
Why Faculty Might Direct Charge in Evanston

- Academic year salary portion is supported by an appropriated budget at the school/center level in most Evanston schools
When Do We Direct Charge?

- The administrator and faculty member must work together to develop an annual plan at the beginning of the FY.

- Make monthly adjustments as needed to reflect unanticipated activities.

- Reduce compliance risks and save yourself transactional work if you complete direct charging before the 90 day period expires.

- Retroactive salary adjustments more than 1 year after date of the initial charge will not be processed.
Evanston Salary Planning Worksheet

Note: Once on the above website, look under “References and Templates” and click “here” to log in with your NetID and password to access this worksheet.
Employee Name: Doe, Jane

Annual Base Salary (NU+NMFF): 275,000.00
Monthly Base Salary (NU + NMFF): 22,916.67

Worksheet Date: 1/12/2016
% APPT $ SALARY NU 82.00% 225,000.00

Workload:

<table>
<thead>
<tr>
<th>Chair Appointment</th>
<th>Monthly Total</th>
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<tbody>
<tr>
<td>Operating Fund</td>
<td>22,916.67</td>
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<tr>
<td></td>
<td>100.0%</td>
</tr>
</tbody>
</table>

BUDGET NOTE: Cost sharing charged to endowment acct

TOTAL CHARGE TO ENDOWMENT (after transfer to cost share): 5,717.72

**Salary Planning**
Chicago 12 Month Salary Template (cont.)

<table>
<thead>
<tr>
<th>Months</th>
<th>Award</th>
<th>Award Period</th>
<th>Award Period</th>
<th>Award Period</th>
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<tbody>
<tr>
<td>AUG</td>
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</tr>
<tr>
<td>Q4 EFFORT REPORT</td>
<td>TOTAL SALARY CHARGES</td>
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<td></td>
<td>Months</td>
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<td>salary</td>
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<td>% NU</td>
<td>% effort</td>
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<td>Months</td>
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<td>30.49%</td>
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<td></td>
<td>68,612.64</td>
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</tbody>
</table>
Faculty Salary Charging Quiz #1

• Prof. Darwin has an academic base salary of $90,000 and a 9-month appointment
• His monthly earned rate is $10,000/month
• He is paid over 12 months
• What is his monthly pay rate (amount paid out in each paycheck)?

Answer: $7,500. Since the salary is paid over 12 months, only 75% of the earned rate is actually paid out in each paycheck.
Faculty Salary Charging Quiz #2

- Prof. Darwin has an academic base salary of $90,000 and a 9-month appointment
- Prof. Darwin wants to charge 1 month of academic effort to his NSF grant.
- What is the total dollar amount of salary that will be charged to the grant?

Answer: $10,000. The effort is based on the earned rate (1/9) not the paid rate (1/12).
• Dr. Oz has an FSM and NMG faculty appointment with an annual base salary on FSM of $50K and an annual base salary on NMG of $235,991. His total annual base salary is $285,991. In order to calculate effort and salary distribution, would we just use the FSM annual base salary or use both FSM and NMG annual base salaries?

• He has two NIH grants, with effort at 20% on one and 10% on another. Would we have to cost share on these grants or not?

Answer: 1.) We would use the IBS, both FSM and NMG
2.) Yes, his IBS is greater than the NIH’s salary cap of $185,100
What are your next steps?

• Once you have determined that you will be involved with direct charging faculty salary to sponsored projects, you will need to:
  – Take the FASIS training classes that give you access to the system
  – Download the salary planning worksheet and/or the SDA form
  – Consult with your deans office or the Office for Research in the medical school for any further guidance, training, or resources

ffra.northwestern.edu
Forms: Where Do You Get Them?

- Summer Salary Forms
  - [www.northwestern.edu/hr/payroll/administratorpayments.html](http://www.northwestern.edu/hr/payroll/administratorpayments.html)

- SDA Forms
  - [www.northwestern.edu/hr/payroll/administratorpayments.html](http://www.northwestern.edu/hr/payroll/administratorpayments.html)

- Salary planning wkst & Academic Base Salary wkst
  - [www.northwestern.edu/coststudies/effort.html](http://www.northwestern.edu/coststudies/effort.html)

*Note:* Once on the above website, look under “References and Templates” and click “here” to log in with your NetID and password to access this worksheet.
Questions?

Chicago:
Marsha McClellan
Director of Financial Management, Feinberg
m-mcclellan@northwestern.edu

Evanston:
Deb Cundiff
Business Administrator McCormick School of Engineering
deb@northwestern.edu
Compensation:
Personal Services
and Effort Reporting

Erin Farlow
Senior Effort Coordinator
Office of Cost Studies
e-farlow@northwestern.edu
Compensation for Personal Services
– Cost Studies Personnel

• Operational Support (Effort Reporting System) and Compliance Monitoring
  ▪ Jennifer Mitchell (Oversees Effort Reporting, 7-2473)
  ▪ Tina Mete (Evanston Effort Coordinator, 1-6755)
  ▪ Erin Farlow (Chicago Effort Coordinator, 3-0323)

http://www.northwestern.edu/coststudies/effort.html
Why Effort Reporting?
Why Effort Reporting?

Effort

- Effort Reporting is the approach NU utilizes to fulfill the regulations in 2 CFR Part 200 (Uniform Guidance), Section 430: Compensation – Personal Services
  - Labor represents ~ 75% of direct research costs
2 CFR PART 200 – Uniform Guidance

- Effective in December, 2014
- Significant updates on Effort Reporting
  - 3 Examples removed (less prescriptive)
  - Internal Controls (200.303) emphasized
  - Written policies/procedures emphasized
  - Institutional Base Salary (IBS) emphasized
- Download
  
  http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl
Standards for Documentation

(i)(1)(i) to (i)(1)(viii)

• Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed

• Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated

• Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities
§ 200.303 Internal Controls

- **Must** maintain effective internal control over the federal award that provides reasonable assurance...

- **Should** be in compliance with *COSO and Standards for Internal Control in the Federal Government* (the “Green Book”).

- **Must** comply, evaluate and monitor compliance with federal statutes, regulations and the terms and conditions of the federal awards

- **Must** take prompt action when non-compliance is identified

- **Must** take reasonable measures to safeguard personally identifiable information and other information designated as sensitive

Is our current Effort Reporting System sufficient for Internal Controls?
What does Effort Reporting Verify?

**Effort**

- Appropriate Base Salary Rate utilized according to appointment(s), which defines IBS
- Appropriate salary/wage charged to sponsored programs (paid effort)
- Cost Sharing performed as promised
  - Mandatory Cost Share (required by sponsor)
  - Voluntary Committed Cost Share (proposed on award budget)
- Salary over the cap cost funded by non-sponsored funds
  - *Appropriate NIH salary cap utilized*
- Research effort fulfilled for NIH career awards
Who Needs to Certify Effort?

Any person paid (or with a commitment) on a sponsored award must certify that the salary paid (or the commitment) is reasonable in relation to the effort (activity) devoted to the award.
### Risk of Non-Compliance…

<table>
<thead>
<tr>
<th>Institution</th>
<th>Settlement Date/ Agency</th>
<th>Alleged Misconduct Issues</th>
<th>Settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yale University</td>
<td>2007</td>
<td>Cost transfers; summer salary charges</td>
<td>$7.6 million</td>
</tr>
<tr>
<td>University of Massachusetts Medical School</td>
<td>NIH</td>
<td>Cost transfer; unsupported labor charges</td>
<td>$24K; triggered Yale &amp; Roger Williams Hospital audits</td>
</tr>
<tr>
<td>University of Pennsylvania</td>
<td>2006/ NSF</td>
<td>Timeliness; cost transfers</td>
<td>$3.3 million</td>
</tr>
<tr>
<td>University of Alabama at Birmingham</td>
<td>2005</td>
<td>Research work overstated; Medicare billed for research</td>
<td>$3.4 million</td>
</tr>
<tr>
<td>Harvard University</td>
<td>2004</td>
<td>Government billed for salaries &amp; expenses unrelated to federal grants</td>
<td>$2.4 million</td>
</tr>
<tr>
<td>Johns Hopkins University</td>
<td>2004/ NIH</td>
<td>Faculty time &amp; effort overstated</td>
<td>$2.6 million</td>
</tr>
<tr>
<td>Florida International U.</td>
<td>2004</td>
<td>Cost transfers and direct costs</td>
<td>$11.5 million</td>
</tr>
<tr>
<td>Northwestern University</td>
<td>2004</td>
<td>Institutional Base Salary (NMFF-NU); K award; Certifier Assignment</td>
<td>$5.5 million</td>
</tr>
</tbody>
</table>
Effort Reporting Phases

**Pre-Award**
- Appointing faculty & staff: Employment terms established: # months (contract period), % full time, base salary

**Preparing the proposal budget**
- Effort proposed; commitment made to the sponsor

**Charging salary**
- Salary charged/cost-shared, consistent with activity to grant budget or cost sharing account

**Certifying effort**
- Effort attested, after activity occurred

**Account close-out**
- Validation of certified effort against salary charges. ASRSP invoices final expenses & sends FSR

**Post-Award**
Life Cycle of Effort Reporting – an ongoing process...

1. Appointing faculty/staff
2. Preparing Proposal Budget
3. Charging Salary
   - awarded after x months
4. Certifying Effort
   - submitting more Proposals near end of project
5. Award Close-out

Effort
Key Principle of Effort Reporting

In a given quarter, the certified % of effort must be equal to or more than the % of salary charged and cost-shared to the grant.
Effort Confirmation
- Per Reporting Period
Payroll Exceeds Effort
- Per Reporting Period

- Payroll exceeds Effort after the Certifier attested his/her Effort expended on the project for the reported period
Effort Exceeds Payroll - Per Reporting Period

• Effort exceeds Payroll after the Certifier attested his/her Effort expended on the project for the reported period.
# Example of Effort Report

**Northwestern University**  
**Reporting Period:** 11/1/2009 - 11/30/2009

### Certified Effort Statement

<table>
<thead>
<tr>
<th>Accounts</th>
<th>Payroll %</th>
<th>Cost Sharing %</th>
<th>Total %</th>
<th>Certified Effort %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sponsored Accounts</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>610-62488888-8001.2345</td>
<td>CHEMO RESEARCH</td>
<td>29%</td>
<td>1%</td>
<td>30%</td>
</tr>
<tr>
<td>610-6991254-80099999</td>
<td>STEM CELL RESEARCH</td>
<td>29%</td>
<td>0%</td>
<td>29%</td>
</tr>
<tr>
<td>850-5248000-80018972</td>
<td>SLEEP DRUG STUDY</td>
<td>8%</td>
<td>0%</td>
<td>8%</td>
</tr>
<tr>
<td><strong>Total Sponsored Accounts:</strong></td>
<td><strong>66%</strong></td>
<td><strong>1%</strong></td>
<td><strong>67%</strong></td>
<td><strong>70%</strong></td>
</tr>
</tbody>
</table>

| Non-Sponsored Accounts |           |                |         |                    |
| 160-1234567 | DEPT ACCT | 11% | -1% | 10% | 7% |
| 710-1234678-98991234 | NU MED FACULTY | 23% | 0% | 23% | 23% |
| **Total Non-Sponsored Accounts:** | **34%** | **-1%** | **33%** | **30%** |

| Grand Total | 100% | 0% | 100% | 100% |

### University Summary

- Instruction: 0% 0%
- Departmental Research: 0% 7%
- Administration: 0% 0%
- Other Institutional Activity: 0% 0%
- University-funded NIMH/RHEMFF Activity: 0% 0%
- University Medical Faculty Foundation Activity: 0% 23%
- Industry-Sponsored Clinical Trials: 0% 0%

### Pre Reviewer / Certifier - N/A

I certify that allocation of activity for the individual shown above is a fair representation for the period noted.

**Form Certified By:** King, Emily  
**Form Certified On:** 01/15/2009

This Effort Form has been successfully Certified.
Effort Reporting: Key Concepts

• 100% Effort ≠ 40 ≠ 60 ≠ 80 hours per week

• Institutional Base Salary (IBS):

Annual compensation paid by an organization for an employee’s appointments, whether that individual’s time is spent on research, teaching, patient care, or other activities. Base salary excludes any income that an individual is permitted to earn outside of duties for the applicant/grantee organization

• Salary increase NOT based on receiving new sponsored funding
  – Changes of responsibilities, merit increase, etc.
Faculty members and senior researchers must commit some effort to the sponsored project within the fiscal year unless specifically exempted by the sponsor.
Effort Reporting: Key Concepts

Summer Effort (9 month faculty)

Agency Prior Approvals:
- 25% or more reduction in time devoted to the project per budget period
- Absence of 3+ months

Change in key personnel
Effort Reporting: Key Concepts

• **Consistency of reporting effort:**
  – Progress reports
  – Current pending & support pages
  – Effort reports
  – Financial status reports

• **NIH Salary cap and career award cap**
  – Difference is funded by a non-sponsored source
Effort Reporting at NU

When to Report Effort:

- Effort reported quarterly
- Effort reports should be certified within 4 weeks after they are available for certification

Escalation Timeline:

<table>
<thead>
<tr>
<th>Estimated Timeline</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day 0</td>
<td>Effort Reports generated by central administration (~2-4 weeks after end of quarter) – notification sent to Dept Administrators with the deadline communicated</td>
</tr>
<tr>
<td>Week 3</td>
<td>Deadline reminder sent to Dept Administrators</td>
</tr>
<tr>
<td>Week 4</td>
<td>Effort reports due (~30 days after generation)</td>
</tr>
<tr>
<td>Week 5</td>
<td>1st warning – completion results communicated to Department Administrators</td>
</tr>
<tr>
<td>Week 7</td>
<td>2nd warning – completion results sent to Department Chairs</td>
</tr>
<tr>
<td>Week 10</td>
<td>3rd warning – completion results and individual delinquency reports sent to Dean’s offices</td>
</tr>
<tr>
<td>Week 14</td>
<td>Delinquency reports sent to VP of Research and Provost Office to determine appropriate action</td>
</tr>
</tbody>
</table>
Effort Reporting System (ERS)

https://ers.northwestern.edu
Effort Reporting Training Sessions

1. Effort 101 Hands-on (Quarterly)
2. Effort & Payroll Open Lab (Monthly)
3. Faculty Effort Reporting (by Request)
4. Brown Bag Sessions
5. One-on-One Assistance
Related Courses Recommended in the Following Order

• Research Administration Training Seminar offered by the Office for Research Integrity (contact ORI to register)
• Effort 101 (contact your Effort Coordinator to register)
• Faculty and Staff Information System (FASIS)
  – HRS 101: FASIS Lookup Training
  – HRS 102: FASIS Deployed Funding
  – HRS 103: FASIS Temp Administration
• Finance Facilities and Research Administration (FFRA)
  – FMS505: Managing Sponsored Projects
• Sign up for FASIS & FFRA courses via FASIS Self Service:
  – FASIS Self Service → Workplace Learning → Request Training Enrollment → Search by Course Number

FASIS Self Service: https://nupa.northwestern.edu
Questions?
APPENDICES

10 Effort Reporting Policies
Appendix I: 10 Effort Reporting Policies

Preparation of the Proposal Budget

1. Basis for estimating effort percentages and calculating salary requests
2. Expectations regarding faculty effort in proposals
3. Institutional stance on voluntary cost sharing
4. Expectations regarding extramural funding of faculty academic year salary
5. Reduction of effort commitments

Charging Salary

6. Prospective establishment of salary on sponsored project (or cost sharing) accounts
7. Summer effort and salary for faculty with 9- and 11-month appointments
8. Retroactive salary adjustments

Certifying Effort

1. Basis for estimating effort percentages and calculating salary requests in proposals
7. Summer effort and salary for faculty with 9- and 11-month appointments
9. Faculty (personal) certification of effort reports
Policy Area #1: The basis for estimating effort percentages and calculating salary requests

Basis for 100% effort

Activities related to NU appointment

Consulting and outside, professional activities, are excluded from the basis for 100% effort
Policy Area #2: Expectation for Faculty Effort in Proposals

Faculty are expected to commit some level of effort (>0%) on proposals on which they are listed as principal investigator (PI) or key personnel, with exceptions for certain types of proposals.
Policy Area #3: Voluntary Cost Sharing

Northwestern University does not typically cost share on a voluntary basis. Voluntary cost sharing commitments are to be made only where the competitive forces and perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant it.
Policy Area #4: Expectations for Extramural Funding of Faculty Academic Year Salary

If faculty expect to expend effort on sponsored projects during the academic year, a proportionate amount of academic year faculty salary should be requested from sponsors (to the extent that this is consistent with agency practice).
Policy Area #5: Reduction of effort when award reduced from proposal

When an awarded budget reflects a reduction from the proposed budget, an evaluation by the PI must occur to determine the effect on the effort commitments.
Salary distribution should begin on sponsored projects and/or cost sharing accounts as soon as the project is awarded, and concurrently with actual project effort.
Effort certification for the period beyond the appointment should only reflect the activity for which the faculty member is responsible and earning salary in that period. For most faculty, this represents effort and salary on sponsored projects only.
Policy Area #8: Retroactive Salary Adjustments

• Highly discouraged for periods for which effort has already been certified

• Charges to the sponsored accounts should not be higher than the certified Effort

• Journal applicable dates must correspond to the intended original transaction

• Retroactive adjustments >90 days past the date of the initial charge require a detailed explanation by the PI

• Retroactive salary adjustments seeking to place costs onto sponsored projects will not be processed if the requested adjustment is >1 year after the date of the initial charge
Policy Area #9: Faculty Certification of Effort Reports

Faculty are required to certify (sign) their own effort reports, and also are required to certify the effort reports of the research staff working on their sponsored projects (graduate students, post doctoral fellows, and other similar persons)
Policy Area #10: Training for faculty and administrators on effort reporting

All faculty and staff involved in effort reporting are expected to receive appropriate levels of effort reporting training.
Office of Research Development

Fruma Yehiely
Associate Vice President for Research
Director, Office of Research Development

yehiely@northwestern.edu
Mission

The Office of Research Development promotes, stimulates and advances the diverse research enterprise across Northwestern University through:

• Facilitating collaborations and interdisciplinary programs
• Supporting the pursuit of funding opportunities
• Promoting the submission of outstanding proposals
• Guiding early career investigators
Constituents and Stakeholders

- Deans, Faculty, Researchers, Research Administrators, Post-docs, Graduate and Undergraduate Students
- Federal Funding Agencies
- Office of Foundation Relations
- Office of Government Relations
- Office of Corporate Engagement
- Office for Sponsored Research
- Partners: Affiliates, Industry, Academic and Non-Academic Institutions
Facilitating Collaborations and Interdisciplinary Programs

- Anticipate and respond to new federally funded initiatives
- Investigator initiated programs
- Guide, connect and facilitate Team Science
- Coordinate preliminary meetings/workshops to form teams/collaborations and develop “white papers”
- Support throughout the evolution of University Research Centers
  - Support and advise new URCs from the inception of ideas
  - Facilitate proposals for external funding (new and existing URCs)
Developing Large Interdisciplinary Proposals Programmatic Support

- Develop “Writer Outline”
- Guide the conceptual development and writing of: vision, administrative core, management plan, broader impact, education, outreach, postdoc mentoring plan, data management plan, data sharing plan, etc
- Advise on budget development
- Letters of support
- Sponsor’s summary statements
- Resubmission
Developing Large Interdisciplinary Proposals Project Management Support

- Generate time-line/roles and responsibilities framework
- Coordinate video/audio conference meetings (PIs, administrators)
- Prepare meeting agenda
- Provide meeting minutes
- Liaise with local RA, OSR, external partners, internal resources, local and external grant writers,
- Manage internal and/or external review
- Coordinate site visits
Facilitating Interdisciplinary Programs

NU-Interdisciplinary Program 1-2-3

- A new seed-funding platform to cultivate investigator-initiated visionary “Big Ideas”
- 3-tiers, non-sequential that address different needs in the continuum of developing visionary science at Northwestern, from the inception of an idea to securing external funding
- NU-Interdisciplinary Program 1-2-3 supports
  - Ideas (I1)
  - Innovative Initiatives (I2)
  - Innovative Initiatives Incubator (I3)
NU-Interdisciplinary Program 1-2-3

• Focus on:
  o Interdisciplinary team (at least 2 schools and 3 departments)
  o Innovation
  o Societal impact

• In addition to funds, the program provides project management, assistance in identifying funding opportunities, proposal development and Team-Science guidance
NU-Interdisciplinary Program 1-2-3

- **I1**: $1,000 for a workshop; rolling submission
- **I2**: $15,000 for expenses pertinent to the submission of a large proposal; rolling submission
- **I3**: $60,000/year for up to 2 years for promoting effective team assembly, developing track record of collaboration, generating preliminary data and submitting a large/center proposal to an external sponsor (August 17, 2015)
- [http://www.research.northwestern.edu/interdisciplinary123/](http://www.research.northwestern.edu/interdisciplinary123/)

- FSM Seed Funding to initiate new Multi-Investigator Program: [http://www.feinberg.northwestern.edu/research/services/for-researchers/seed-grants.html](http://www.feinberg.northwestern.edu/research/services/for-researchers/seed-grants.html)
Pursuit of Funding Opportunities

• Anticipate, monitor, identify and disseminate funding opportunities and related information to targeted investigators
  o Large biomedical and physical sciences federal grants
  o Social Sciences and Humanities grants
  o “Limited Submission” funding opportunities
  o Disseminate Foundation and Corporate funding opportunities
  o Cleared Concepts - NIH
  o Notice of Intent to Publish a FOA – NIH
  o Dear Colleague Letters – NSF
  o Information of new federal funding initiatives in collaboration with OGR
Pursuit of Funding Opportunities (Cont’d)

• Provides free access and guidance on using funding opportunities data bases:
  o SciVal Funding
    o www.funding.scival.com
  o COS Pivot
    o pivot.cos.com/funding_main

• Federal agencies websites search and set up alerts:
  o www.grants.gov
  o grants.nih.gov/grants/guide/index.html
  o nsf.gov/funding
  o DoE, DoD, USDA, NASA, NOAA, NEH…
Promote the Submission of Outstanding Proposals

• Personalized service to faculty from all disciplines (smaller scale proposals, single investigator, etc)
  o Clarify and confirm sponsor’s expectations and guidelines
  o Enhance faculty communications with program officers
  o Advise on strategic approaches to developing a proposal

• Outreach
  o “ORD Presents” workshops (NSF MRI, Limited Submissions, NIH P30..)
  o Organize federal agencies grant writing workshops
  o Bring program officers to Northwestern
  o Provide institutional subscription to research development and grant writing resources
  o “Science of Team Science”

• Manage the Institutional Limited Submissions Process
Limited Submission

- Funding opportunities that the number of applications submitted from any given institution is limited by the sponsor
- ORD manages the institutional process for selecting NU nominees for Federal, Foundations and Corporations funding opportunities
- NU has established a transparent, efficient and effective process for selecting successful nominees

http://www.research.northwestern.edu/ord/funding/limited-submissions/
Northwestern’s Limited Submission (LS) Process

- Identification of LS funding opportunities
- Dissemination of LS announcements
- LOIs
- Internal proposals
- Review
- Notification
- Nomination
Limited Submission: Dissemination of Announcements

• Targeted and inclusive dissemination
• Subject: LIMITED FUNDING OPPORTUNITY: …..
• Summary of opportunity and eligibility criteria
• Link to the sponsor’s website
• Key dates: LOI, internal proposal submission, notification, sponsor deadline
• Instructions: LOI form, internal proposal components, upload information
• All announcements and their status are posted on ORD’s website
• You can opt-in to receive all announcements
Limited Submission: LOIs

• Submission of the LOI by the deadline is **required**, but no binding
• Based on institutional interest:
  o First come, first served
  o Applicants are authorized by ORD to submit a proposal to sponsor
  o A competition is required, all applicants are invited to submit internal proposals
Limited Submission: Review Process

- The Limited Submission Advisory Committee is charged with selecting the most nationally competitive applicants.
- Senior faculty from FSM, WCAS, McC, SESP and SoC.
- Humanities ad hoc panel is invited as necessary.
- Ex officio and ad hoc reviewers are invited as appropriate.
- Panel review (video-conference between campuses).
- Selection is requires approval by the VPR.
Limited Submission: Notification

• All candidates are notified by email by the stated deadline

• Feedback is provided to all applicants

• Nominees are invited to work with the Office of Foundation Relations on Foundation proposals

• OSR GO is notified
Limited Submission: Outcomes

• Packard Science and Engineering Fellows
  National awardee each year 2007-11, 2013
  (of an annual total of 16 fellows from 50 Universities)

• Pew Biomedical Scholars
  (of an annual total of 21 scholars nationally)
Guiding Early Career Investigators

- Reach out to new faculty, present at new faculty orientations
- Consult and perform customized funding opportunities search, recommend collaborators
- Develop a strategy of applying to prestigious fellowships
- Grant Writer’s Groups for NIH “R” and “K” awards
  - Rick McGee, Associate Dean for Faculty Recruitment and Professional Development, FSM
    - R01 and K awards peer review in FSM
      - [http://www.feinberg.northwestern.edu/fao/faculty/development-resources/grant-proposal-review.html](http://www.feinberg.northwestern.edu/fao/faculty/development-resources/grant-proposal-review.html)
    - NSF CAREER workshop
    - Coming up: resources for early career investigators on ORD’s website
ORD Website

www.research.northwestern.edu/ord/

Under construction
ORD Locations

633 Clark Street
North Tower, Room 2-543, Evanston
(847) 491-1074

750 N. Lake Shore Drive
Rubloff, Room 711, Chicago
(312) 503-4134
ORD Team

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Assistant Director

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Administrative Assistant  
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Questions?
Office of Foundation Relations

Michael Kelley
Senior Associate Director
Foundation Relations
mhkelley@northwestern.edu
The Office of Foundation Relations (OFR) is Northwestern University’s central office supporting faculty and staff who seek funding from private professional foundations. OFR manages relationships with foundations to advance University goals and priorities.
Private Foundations & Why They Give

• Private foundations are mission-driven grant-making organizations that support exceptional projects and new initiatives that address specific societal problems and benefit the larger community

• These national, professionally staffed foundations typically do not provide funding for core University needs

• At NU, foundation grants average $200,000
  
  – “An institution is the lengthened shadow of one man.” – R.W. Emerson
  – “You’ve seen one foundation, you’ve seen one foundation.”
FY2015 Private Foundation Funding

• $70.2M in foundation commitments to Northwestern

• 337 proposals requesting a total of $162.3M

• NU foundation proposal success rate is approx. 50%

• Top grant: $8.9M

• Assistance to every Northwestern School
OFR Services

http://www.northwestern.edu/foundationrelations/

- Coordinate strategic approaches to foundations
- Research foundations to identify potential funders
- Review proposals to craft persuasive arguments
- Provide materials for submission (IRS documents, financial statements, etc.)
- Partner with campus leaders and research administrators
- Track proposal submissions in development database
- Facilitate grant reporting
- Offer workshops on foundation grantseeking
Finding Private Foundation Funding

http://www.northwestern.edu/foundationrelations/

- Requests for Proposals (ORD and OFR websites)
- Databases:
  - Foundation Directory Online
  - COS Pivot
- Before contacting organizations listed in these databases, please contact OFR for advice and clearance
  - Restricted Foundations
    http://www.northwestern.edu/foundationrelationsfinding-funders/restricted-foundations.html

OFR
Contact OFR

Please contact our office with any questions you may have about private foundations or whenever a faculty member you are working with is interested in seeking foundation funding.

foundationrelations@northwestern.edu
(847) 491-4590
Corporate Engagement at Northwestern University

Kara Moore
Associate Director
Kara-Moore@northwestern.edu
Corporate Engagement

• **Jim Bray**, Interim Director
  j-bray@northwestern.edu, 1-3371

• **Tim Angell**, Senior Associate Director
  timothy.angell@northwestern.edu, 1-8652

• **Kara Moore**, Associate Director
  kara-moore@northwestern.edu, 1-7383

• **Allison Savage**, Program Assistant II
  allison.savage@northwestern.edu, 1-8802
Corporate Engagement | What we do

• Help faculty and staff **find and meet industry contacts** in R&D, tech scouting, corporate foundations, university relations and more

• Provide **background information** on current relationships between companies and the entire university

• Review **proposals** and supporting correspondence to formal and informal corporate grant-makers

• Administer scheduling, space and provisions for **campus visits** by corporations
Corporate Engagement | Facilitates Campus Coordination
Corporate Engagement | Managing the Relationship

- Google
  - Research Grants
  - Recruiting
  - Guest Speakers

- Wells Fargo
  - 2014 Clean Energy Student Challenge
  - Pitch Competition Grant
Corporate Engagement & Pre-Award

- Identify Industry Funding Opportunities
  - If Research Funding – we work with ORD
  - If Program Funding – we send to all relevant parties
  - Ensure limited submissions coordination

- Help with Proposal Development
  - Help with common (and uncommon) deliverables
  - Indirect costs
  - Collaborate with OSR and ORD
Corporate Engagement | & Post-Award

- Appropriate accounting for grants, awards, gifts
  - Checks, WTs, In-kind
  - Gift vs Grant
  - Coordination with OSR, OGC, ASRSP

- Relationship Management
  - Share appropriate information
  - Find new corporate connections for PIs and Administrators
Questions?

@NUCorpRel

corporate.northwestern.edu
Develop Proposals and Manage Sponsored Projects with InfoEd, NUFinancials and Cognos

Virginia Robbins
Senior Training Specialist-Team Lead
Northwestern IT
v-robbins@northwestern.edu
it.northwestern.edu
What are IT Administrative Systems?

• NUFinancials, InfoEd, Cognos, FASIS, iBuyNU, NUPlans, and FAMIS
  – Customized to interface with each other.
  – Customized to Northwestern’s business processes.
  – Supported by IT teams.
InfoEd

- InfoEd Proposal Tracking and Proposal Development
  - View Pre and Post Award information
  - Personnel, Budget, and Effort
InfoEd Proposal Development!

What *is* InfoEd PD?

- A shared-access system for preparing, approving and submitting all proposals.

- System-to-system: data entered in the local system is submitted directly to another system, for Grants.gov proposals.

- Became mandatory on April 1, 2012.
NUFinancials

- View Post Award information
- Enter transactions & view real-time budget info
- Real time data
Cognos

- Reports on InfoEd and NUFinancials data
Sponsored Research Stages!

- **Proposal Submission**: Create and submit the proposal
- **Pre-Award**: Update proposal as requested from sponsor
- **Award Start-up**: Manage the set-up of the actual budget
- **Post Award Management**: Spend/monitor expenses on award budget
- **Award Closeout**: Finalize, correct, submit
What classes should I take?
Grant-related

- FMS502 InfoEd Proposal Development
- FMS503 InfoEd Approvals (online)
- FMS504 Reports in Sponsored Research (New, online)
- FMS505 Managing Sponsored Projects
- FMS507 Clinical Trials Proposals in InfoEd

http://ffra.northwestern.edu/secure/training/fms505-grants-training-plan.html

Recommended Grants Training Plan!

You can register for classes in FASIS Self Service!
What other classes should I take?

Introductory
• FMS807 Expense Reports
• FMS832 Online Voucher & Payments
• FMS112 Running and Scheduling Reports
• FMS803 Requesters Basic Topics
• FMS801 Shopping in iBuyNU

Intermediate
• FMS711 Correction, Transfer and Internal Sales journals
• FMS722 NUFinancials Budget Searches

Advanced
• FMS723 Reconciling your Budgets
• FMS815 Requesters Advanced Topics
Anymore? I love classes!

Online:
- FMS804 Approvals and Workflow
- FMS720 NUFinancials Budget Adjustments
- FMS816 Receipts
- FMS900 FAMIS Service Requests

NUPlans
- Budgeting and Forecasting classes

FASIS
- HRS101 FASIS Lookup
- HRS102 FASIS Deployment Funding
- HRS401 Position Data/Appointment Forms

Effort Reporting
Your Education Action Plan!
(learning comes in many forms)

1. Take some classes!
2. Join NURAP!
3. Join listservs for OSR, ASRSP, NURAP, Financial Operations!
4. Network!

http://ffra.northwestern.edu/training/gettingstarted.html
http://ffra.northwestern.edu/training/sequence.html

Come see us in classes soon!
Check Your Knowledge
The Seminar is Complete!

Thank you for completing the Research Administration Training Seminar!

I will be emailing a brief survey regarding day 4 of this training. Please take a few minutes to fill it out as we are always looking for suggestions for improvement!

If you have any questions or concerns, please do not hesitate to contact me.