Research Administration Update
April 2021

Grants & Contracts Administration
OSP Reminders
Refresher on Conflicts of Interest & Conflicts of Commitment

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Types Of Potential Conflicts

Conflicts of Interest

Conflicts of Commitment

Real/Actual vs. Potential/Perceived
Conflict of Interest

Exists when one’s Outside Activities or Financial or Personal Interests that could directly or significantly affect performance of your UMMS responsibilities, with the potential to:

1. Influence, or even appear to influence, your conduct or decisions in your job
2. Impair your independence of judgment in your job
3. Induce you to inappropriately disclose confidential or proprietary information that you have obtained in your job

Conflicts of interest typically involve financial or personal gain
Conflict of Commitment

Exists when one’s **Outside Activities** - individually or in the aggregate - potentially interfere with the priority and performance of Institutional Responsibilities (beyond the amount of time allowed by policy)

**Examples**

- A new start up company requires considerable faculty time & effort at expense of research/teaching
- Ext. travel/time off campus in support of teaching/research at another institution
- Multiple SAB and consulting engagements > allowable max (~1 day/week for full-time faculty, pro-rated for part-time)

**Conflicts of commitment are generally matters related to time, not $$**.
Research COI

- **Definition (aka FCOI):** Refers to situations in which financial considerations may compromise, or have the appearance of compromising, an Investigator’s professional judgment in conducting or reporting research
  
  - PHS: When a Significant Financial Interest could directly or significantly affect the design, conduct, or reporting of the research

- **Policy Framework**
  
  - Policy on Conflicts of Interest related to Intellectual Property and Commercial Ventures
    - Incl. Addendum re: Promoting Objectivity in Research (PHS)
  
  - Policy on Conflicts of Interest Human Subjects Research Guidelines & Procedures
  
  - Policy on Faculty Consulting and Outside Activities
  
  - Intellectual Property Policy
Conflict Disclosure Mechanisms

- **Online platform**
- **Annual campaign (typically April 1)**
- **Incorporates Open Payments/CMS data**
- **Update on rolling basis within 30 days**

- **E-Form required in connection w/proposals**
- **All “Investigators” as identified by PI**
- **Any significant financial interest related to the specific project**

- **Form in eIRB; for all research study staff**
- **SFI related to the clinical trial → COI Panel**
- **IRB has final say**

- **E-Form to request Chair/Supervisor approval**
- **Any Outside Activity involving comp or time away from usual duties**
eCOI Disclosure System

- Shared System – UMMS and UMMHC
  - ummhc.ospreycompliancesuite.com/coiriskmanager
- New in 2020; form updated 2021
- An after-the-fact description of FI and OAs, incl.:
  - Compensated outside activities
  - Service on outside boards
  - Certain FI in for-profit business entities
  - Activities/interests of family members that might create a conflict
  - Outside appointments
  - Sponsored Travel
  - Gifts received that might appear to create a conflict
- System flags positive disclosures for review by UMMS/UMMHC reviewers
**Required Disclosers**

**Faculty Members:** Salaried full- or part-time* faculty, but excluding unpaid or temporary Affiliate, Adjunct, Emeritus or Visiting Faculty.

**Investigators:** PI, Co- or Sub-Investigators, project director, or any other individual designated by PI

Can include post docs, residents, students, collaborators, consultants

**Senior Officials & Administrators:**
Senior/Exec Leaders, Deans, Chairs, and staff members involved in technology commercialization, research compliance, contract management and procurement
Conflicts Reviewers

**Office of Mgmt.**
- Oversee COI Disclosure System
- Draft policies & procedures
- Evaluate non-research COIs
- Office of record

**COI Director**
- Screens conflicts & routes to Panels
- Prepares cases for review by campus & system Committees

**UMMS COI Committee**
- Conflicts Committee
  - Evaluates all potential conflicts involving research
  - Develops and enforces mitigation plans
- Panel
  - Panels (Clinical and Basic Science) screen research-related SFIs to identify those that require review by the full Conflicts Committee

**Dept. Chairs**
- Reviews Outside Activity requests
- Addresses faculty COC matters

**System COI Committee**
- Reviews campus ICOIs
- Reviews campus cases involving a “substantial interest”
Conflicts Review Process*

- **Potential COI**
  - Non-Research COI
    - Office of Mgmt.
  - Research COI
    - Basic Sci Panel
    - Clinical Panel
  - Institutional COI
    - Ad hoc ICOI Panel
      - Dept. Chair
        - System COI Comm
  - Full COI Committee Review
    - Panel Decision
      - Yes
        - Is there an R-COI?
          - No
            - Can R-COI be managed?
              - Yes
          - No
              - Can R-COI be managed?
                - No
Questions/Guidance

Email: COI@umassmed.edu

Phone: 508.856.6960

Website:
www.umassmed.edu/officeofmanagement/conflicts-of-interest/

COI Disclosure:
ummhc.ospreycompliancesuite.com/coiriskmanager
Grant Accounting Reminders
Cost Transfers

- Cost Transfer Policy Review

  - Link to relevant policies on my last slide for reference.
    1. Deficit Balance Policy
    2. Unallowable Cost Policy
Objectives

• Key Policy Take-Aways
1. Deadlines/Cut-Off Dates
2. Special Categories of Cost Transfers/Documentation
   o Under 90 days
   o Over 90 days
3. Identifying Acceptable/Unacceptable Exceptional Circumstances as they relate to delay of transfer.
Policy Links

- [https://edit-inside.umassmed.edu/Policies/Policies-listing-page/Financial-Services/Post-Award-Administration-and-Compliance/Cost-Transfer/](https://edit-inside.umassmed.edu/Policies/Policies-listing-page/Financial-Services/Post-Award-Administration-and-Compliance/Cost-Transfer/)


- [https://edit-inside.umassmed.edu/Policies/Policies-listing-page/Financial-Services/Post-Award-Administration-and-Compliance/unallowablecosts/](https://edit-inside.umassmed.edu/Policies/Policies-listing-page/Financial-Services/Post-Award-Administration-and-Compliance/unallowablecosts/)
Closeout

- NOT-OD-14-084 – NIH Updating Grant Closeout Policies and Procedures to Align with the New HHS Requirements
- NOT-OD-15-111 – Deadline for Final Reports Required for Grant Closeout
- NOT-OD-15-135 – Grant Closeout: Deadlines for Financial Drawdowns and Reporting in PMS
- NOT-OD-16-028 – Transition to Payment Management System Subaccounts: FY2016 Supplements

Focus of the NIH, DHHS and other Federal agencies for a number of years.
NOT-OD-21-102 – Reminders of NIH Policies Related to Closeout

• Deadlines for drawing funds from Payment Management System (PMS)
  • Later of FFR due date or 120 days past performance period end date

• Federal Financial Report (FFR) submission
  • Certification that information is correct, complete, and is for the grant purpose

• Reconciling Errors
  • “...rare cases”
  • Beyond the 120 day period, we must notify the GMS for guidance

• Why necessary
• Action being taken to preclude similar situation in future

All financial information in one system (PMS) – compliance and enforcement simplified.
Timeliness Issues

- Accounts not being reviewed monthly
- ePAFs/DEFAs not being processed to remove personnel charges
- Grant Closeout Checklist not being followed/completed
- Closeout not treated as a deadline
  - “I can’t take care of that - other deadlines”
- FFR error reconciliation – not “rare”

UMMS Policy No. 05.02.05
- 120 Day Notice of Expiring Accounts with Grant Closeout Checklist
- 30 Day Reminder

Deficit Balance Report
Procedures

• ePAF/DEFAs - required to be processed by budget period end date (Grant Closeout Checklist)
  • PA will be processed to remove salary 15 days after the end of the period of performance

• Grant Closeout Checklist
  • Included as Milestone in PS
  • Use will be enforced

• “Revised” FFR to correct errors (“RARE”)
  • no later than 1 year from the due date of the original report for annual FFRs
  • no later than 60 calendar days from the due date of the original report for final FFRs
QUESTIONS?