ABC Research Meeting: University Conflicts of Interest Program

Mary Lee, Director, University COI Program
Dean of Research Office
November 14, 2015
Quick Hits

• COI Program Overview
  • School COI Program Managers
  • Research-related COI
• Gifts COI Criteria will change
• COI reviews for SeRA transactions
School COI Program Managers

Graduate School of Business
Olena Sushko / Claudia Morgan / Prof. Glen Carroll

School of Earth Sciences
Sue Crutcher / Amy Balsom / Prof. Stephan Graham

Graduate School of Education
Tanya Chamberlain / Priscilla Fiden / Stephen Olsen

School of Engineering
Christine Eichar / Prof. Jennifer Widom

School of Law
Amy Applebaum / Prof. Mark Kelman

School of Humanities & Sciences
Martha Langill / Ellie Maldonado
- Social Sciences – Prof. Ellen Markman
- Natural Sciences – Prof. Ralph Cohen
- Humanities & Arts – Prof. Deborah Satz

School of Medicine
Shannon Shankle / Barbara Flynn / Dr. Harry Greenberg

SLAC National Accelerator Laboratory
Amy Rutherford / Stephen Porter, Esq. / Prof. David MacFarlane
Loss of Credibility in University Research Results

Principal Investigator's Research Results are influenced by:

- Equipment/Materials
- $(Equity, Consulting)$
- "Prestige"

Question: Does the COI have the potential to affect the design, conduct or reporting of the research?

Loss of Credibility
- Loss of Reputation
- Loss of Funding
## New COI Review Criteria for Gifts!

<table>
<thead>
<tr>
<th><strong>Dollar Threshold for Review</strong></th>
<th><strong>CURRENT</strong></th>
<th><strong>NEW (Target Date 11/21/2015)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>$1,000 and above</td>
<td>$50,000 and above</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Purpose</strong></th>
<th><strong>CURRENT</strong></th>
<th><strong>NEW (Target Date 11/21/2015)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Gift is for Research, Teaching, or Scholarship</td>
<td>Gift is for Research (in whole or in part)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Recipient</strong></th>
<th><strong>CURRENT</strong></th>
<th><strong>NEW (Target Date 11/21/2015)</strong></th>
</tr>
</thead>
</table>
| * Individual Faculty Member’s COI will be reviewed.  
* Program, Department, School, University “head” must still complete the form. | Individual Faculty Member’s COI will be reviewed. |

<table>
<thead>
<tr>
<th><strong>Donor</strong></th>
<th><strong>CURRENT</strong></th>
<th><strong>NEW (Target Date 11/21/2015)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>For-Profit, Non-Profit, Individual, Estate</td>
<td>For-Profit only</td>
<td></td>
</tr>
</tbody>
</table>
## Gift Stats

<table>
<thead>
<tr>
<th>Year</th>
<th>Total gifts</th>
<th>&gt; $1k</th>
<th>&gt; $50k</th>
<th>For-Profit</th>
<th>Named Faculty</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>32,340</td>
<td>9,958</td>
<td>1,302</td>
<td>157</td>
<td>109</td>
</tr>
<tr>
<td>2014</td>
<td>34,388</td>
<td>13,093</td>
<td>1,816</td>
<td>150</td>
<td>104</td>
</tr>
<tr>
<td>2015*</td>
<td>8,535</td>
<td>3,935</td>
<td>784</td>
<td>81</td>
<td>66</td>
</tr>
</tbody>
</table>

* Indicates the volume of gifts received by Stanford as of July 2015.
SeRA & OPACS Process Flow Map – Proposal to New Award

New Award

SeRA System
- Proposal submitted to SeRA
- Submit Proposal to Federal Agency
- Notice of Award from Federal Agency
- Contract & Grant Officer checklist
- SU Notice of Award

COI Review
- COI Screening Question
- JIT COI Review through OPACS Transactional Module
If your transaction is paused for COI review, please ask your PI to complete the COI questionnaire at [http://opacsprd.stanford.edu/](http://opacsprd.stanford.edu/). Until that is completed, the School COI Manager cannot see the SeRA transaction in her OPACS dashboard!
Any Questions?

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Director, University Conflicts of Interest Office
(650)736-6518
marylee@Stanford.edu

OR

School Program Manager
Go to the DoResearch web site
Search “COI School Contacts”
Cardinal Curriculum new look, new registration
new content, new workshop

Let’s take a peek!
browse for a course, a certification program or an audience
View and filter all courses

<table>
<thead>
<tr>
<th>Name</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIH K Award Grants.gov</td>
<td></td>
</tr>
<tr>
<td>Animal Care and Use Training Program</td>
<td>VSC-PROG-0001</td>
</tr>
<tr>
<td>Protection of Human Research Subjects</td>
<td>CITI</td>
</tr>
<tr>
<td>Conflicts of Interest Certification</td>
<td>COI-PROG-0001</td>
</tr>
<tr>
<td>PI Training: Stewardship and Compliance for Principal Investigators</td>
<td>DOR-0680</td>
</tr>
<tr>
<td>Understanding Cost Policy</td>
<td>DOR-1101</td>
</tr>
<tr>
<td>Overview of Research and the Regulatory Environment</td>
<td>DOR-1102</td>
</tr>
<tr>
<td>Proposal and Budget Preparation</td>
<td>DOR-1120</td>
</tr>
<tr>
<td>Award Process</td>
<td>DOR-1121</td>
</tr>
<tr>
<td>Subawards</td>
<td>DOR-1122</td>
</tr>
<tr>
<td>NIH A Guided Tour</td>
<td>DOR-1123</td>
</tr>
<tr>
<td>Overview of Stanford University Service Center Policies &amp; Practices</td>
<td>DOR-1125</td>
</tr>
<tr>
<td>Managing Sponsored Projects</td>
<td>DOR-1126</td>
</tr>
</tbody>
</table>

search for a course, a certification program or an audience
DoResearch UX

- When user first visits course page, only first step is available
- Clicking “launch training” button provides one-click access to training materials for logged-in user
- If user is not logged-in, they will be redirected to log in screen before being granted access to training material

Certification steps

1. Complete the online training
   Complete the online training to prepare for penatibus et magnis dis parturient montes, nascetur ridiculus mus. Nullam sit amet urna felis. Maecenas dapibus, magna fermentum suscipit bibendum, ipsum quam aliquet felis.
   LAUNCH TRAINING

2. Take the online test

3. Record completion in STARS
DoResearch UX

- User records completion and diagram updates accordingly
- Training action remains available for future reference, but test and completion action buttons won’t appear
- Data for PI Training is sent to SeRA and shows up in the PDRF
Cardinal Curriculum

• All online classes have been updated
• All online classes will have a monthly companion workshop
Business Expenditure Processing Review
Administrators Building Competencies in Research (ABC Meeting)

Sandip Darji, Senior Director of Business Process and Metrics Analysis
October 14, 2015
Agenda

1. Project overview and recommendations
2. Changes for campus on November 2, 2015
3. Guidance from the University Cabinet
4. Next steps
Overview: Internal Review Findings

**Problem:** Analysis shows we are not as diligent as we should be in adhering to policy and documenting and reviewing expense transactions

- Unallowable, unallocable, or unreasonable expenditures passing review:
  - Reimbursement for personal expenses
  - First/Business class air travel
  - Excessive food costs
  - Alcohol
  - Allocation of equipment expense

- Inadequate supporting documentation

- Inaccurate per diem calculations

**Goal:** Develop and implement solutions that better ensure compliance with university and regulatory requirements while providing distributed units with an efficient way to manage transactions.
Overview: project recommendations

Recommendations for these roles around process, people, policy, training, systems/reporting.

- Agreed upon criteria for review
- Doubled staff (added 4 FTE)
- Post quality audits, feedback, and coaching
- 100% review of sponsored transactions at closeout for selected agencies
- Feedback and coaching
Travel packet and expense report checklist

- **Purpose**
  - Facilitate handoff of materials between payee and preparer
  - Create compliant transactions

- Over 13,000 travel packets have been distributed since May 2015

- **How to get them?**
  - Travel Packet:  
    Contact Financial Support Center
  - Preparer Checklist:  
    PDF available on Fingate
Changes coming
November 2, 2015
Three drivers for Business Expenditures/Expense Requests changes

User feedback
Audits
Analytics
# Expense Requests and Admin Guide changes

<table>
<thead>
<tr>
<th>Driver</th>
<th>Description</th>
<th>Feature / Function</th>
</tr>
</thead>
</table>
|        | Administrative Guide (sections 3.2.1, 5.4.1, 5.4.2, 5.4.3, 5.4.4) | Emphasized intent and good judgment  
Organized sections and reworded language  
Separated procedure from policy and move to Fingate (reduces length by 40%) |
|        | Full View enhancements | Line numbering sequencing  
Show details button  
Per Diem/mileage calculations  
Attachment icon by the line number  
Link to attachment window where transaction level attachments can be accessed |
|        | Consistent line numbering and order | Review page, Confirmation page and Full View group and number lines consistently  
Lines grouped by Expense Source, i.e. TCard, Cash, Per Diem, Personal, etc. |
|        | Line Level Attachments | Requirement to attach Airfare, Lodging, Conference Agenda back-up at line level |
|        | System Controls and Spend Management | Requirement to enter in new fields:  
• number of attendees for business meals  
• number of days for lodging and rental car  
• Air travel – booking method and airline name  
• lodging – location and hotel name  
• explanation of high cost (when prompted by warning messages) |
|        | Reject Codes | Approvers select and make note of reject reasons  
Preparers see notes |
## Change management activities for 11/2 go live

- Getting the following audiences ready:

<table>
<thead>
<tr>
<th>Campus Users</th>
<th>Senior Management</th>
<th>Central Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>September UAT (27 approvers and preparers representing seven budget units)</td>
<td>Project Steering Committee reviews of admin guide (See appendix for list of Steering Committee members)</td>
<td>Joint training for Financial Support Center specialists and T&amp;R auditors</td>
</tr>
<tr>
<td>ABC meeting on 10/14</td>
<td>Executive communication of changes from CFO Randy Livingston</td>
<td>T&amp;R auditors prepped to handle, as exceptions, in progress transactions during cutover</td>
</tr>
<tr>
<td>Financial Management Forum on 10/21</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Targeted user emails</td>
<td></td>
<td></td>
</tr>
<tr>
<td>News bulletins and updated content on Fingate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Updated user training (FIN-400 and FIN-103)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Post Go live campus roadshows (if needed)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Cabinet guidance
Summary of guidance

Policy will remain “lowest available” economy fare, while allowing for ancillary add-ons (e.g., convenient seating, direct route, wifi)

• Changes included in admin guide revisions for 11/2

New university policy on reviews and escalations

• All transactions outside of stated guidelines will be escalated to respective Dean’s Office for appropriateness review/approval

• Met with 12 budget units to date: reviewed proposed process, meals data, and identified escalation point of contact

• Targeting December rollout

(Absent from May meeting)
Next steps

1. Implement Administrative Guide and system changes on November 2, 2015
2. Implement escalation process (target December)
3. Implement remaining recommendations in progress
   - Require FIN-103 Approving Financial Transactions training for all financial approvers (January/February 2016)
     - FIN-400 Traveling for Stanford training course will be a prerequisite
   - Traveling for Stanford alternative training for payees (target TBD)
Appendix
# Project sponsorship and steering committee

<table>
<thead>
<tr>
<th>Sponsor</th>
<th>Budget Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Russell Brewer</td>
<td>Office of Sponsored Research</td>
</tr>
<tr>
<td>Susan Calandra</td>
<td>Financial Management Services</td>
</tr>
<tr>
<td>Rick Moyer</td>
<td>Office of Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Ken Schulz</td>
<td>Research Financial Compliance and Services</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Member</th>
<th>Budget Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeanne Berent</td>
<td>Office of Development</td>
</tr>
<tr>
<td>Sara Bible</td>
<td>Dean of Research</td>
</tr>
<tr>
<td>Scott Calvert</td>
<td>School of Engineering</td>
</tr>
<tr>
<td>Adam Daniel</td>
<td>School of Humanities and Sciences</td>
</tr>
<tr>
<td>Peter Hoenig</td>
<td>Residential and Dining Enterprises</td>
</tr>
<tr>
<td>Rhonda Marsh</td>
<td>Office of the President and Provost</td>
</tr>
<tr>
<td>Sam Zelch</td>
<td>School of Medicine</td>
</tr>
</tbody>
</table>
Escalation sequence of events

Current Process (communication to originator/preparer only)

Payee  Preparer  Approver  T&R Auditor

Is it compliant? Is it appropriate?

Proposed Escalation Process

Is it compliant*?

Is it appropriate?

*Compliant = checking for documentation, appropriate accounting, presence of business purpose, etc.
# Budget unit points of contact

<table>
<thead>
<tr>
<th>School/Budget Unit</th>
<th>Escalation Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dean of Research</td>
<td>Sr. Associate Dean</td>
</tr>
<tr>
<td>Department of Athletics</td>
<td>TBD - Pending data review</td>
</tr>
<tr>
<td>Graduate School of Business</td>
<td>Designee</td>
</tr>
<tr>
<td>Graduate School of Education</td>
<td>Sr. Associate Dean (for now)</td>
</tr>
<tr>
<td>Land Buildings and Real Estate</td>
<td>TBD - Pending data review</td>
</tr>
<tr>
<td>Law School</td>
<td>Sr. Associate Dean</td>
</tr>
<tr>
<td>Office of the President and Provost</td>
<td>Designee</td>
</tr>
<tr>
<td>School of Earth, Energy and Environmental Sciences</td>
<td>Sr. Associate Dean</td>
</tr>
<tr>
<td>School of Engineering</td>
<td>Sr. Associate Dean or Designee</td>
</tr>
<tr>
<td>School of Humanities and Sciences</td>
<td>Sr. Associate Dean</td>
</tr>
<tr>
<td>School of Medicine</td>
<td>DFAs and Controller</td>
</tr>
<tr>
<td>Student Affairs</td>
<td>TBD - Pending data review</td>
</tr>
<tr>
<td>Vice Provost of Graduate Education</td>
<td>Director of Finance</td>
</tr>
<tr>
<td>Vice Provost for Undergraduate Education</td>
<td>TBD - Meeting on 10/12</td>
</tr>
</tbody>
</table>
OSR Initiatives
ABC Meeting
October 14, 2015
What we are up to.....

- Town hall meetings with schools and departments
  - We heard you!

- A hard look at the current PTA set up process

- Continuous review of cycle times for award negotiation and account set up

- How to leverage SeRA-its not just for transactions
  - Example: My Accounts dashboard for faculty

- Offering the OSR Seminar series on topical items
Joint Initiatives…..

- OSR and RMG
  - PDRF Redesign
  - How we use the SeRA system

- OSR, RMG, and DoR
  - Develop a boot camp training program for department administrators to supplement Cardinal Curriculum.

- Regular meetings with RMG and ERA to better define roles and responsibilities
But we want to do more....

- What if we step back and look at the entire process?

- Strategic thinking about specific aspects of research administration through
  - Focus groups
  - Brown bags

- With our partner groups, map the entire sponsored project lifecycle to find areas of focus.
Chart of Accounts Changes
Starting Sept. 1, 2015

OFFICE OF THE VICE PROVOST AND DEAN OF RESEARCH

&

OFFICE OF RESEARCH
FINANCIAL COMPLIANCE AND SERVICES

PRESENTED BY JESSE CHARLTON, DIRECTOR, RAPC AND CAROL COOK, SENIOR ANALYST, CMA
What is changing in the Chart of Accounts?

- Eleven general/special purpose and data storage/non-data storage expenditure types are being discontinued and are;

- Replaced by four new and two existing expenditure types
Why change the Chart of Accounts?

• To simplify the Chart of Accounts

• To achieve consistency with federal rules
Federal Uniform Guidance and OMB Circular A-21

• General and special purpose identifications pertain to capital equipment

• Non-capital equipment are supplies

• Computing devices below $5K are considered supplies chargeable to federal awards if essential and allocable, but not solely dedicated to the performance of the award
COA Expenditure Type Change Highlights
(no changes were made to capital equipment ETs)

- Data storage and computer supplies ETs are consolidated into one new “computing devices” ET
- New ET created for lab/scientific non-capital equipment
- General purpose and non-data storage ETs are replaced by generic supplies, rent, and repair ETs
Transitioning to Replacement ETs

- **9/1/15** - Use replacement ETs for all new business. Discontinued ETs used in existing business already in process will not be affected.
- **11/1/15** - Discontinued ETs will be blocked from all new business in purchasing systems.
- **3/1/16** – Procurement initiates outreach program to address existing business in discontinued ETs.
- **9/1/16** - All business must be conducted in the replacement ETs. Discontinued ETs will be end-dated as of 8/31/16.
Detail

• Bulletin: Consolidating Select Expenditure Types
• Replacement & Discontinued ETs with Definitions

Resources

• Oracle Expenditure Type Query Tool
• Bulletin: Expenditure Type & Object Code Updates
• DoResearch for discussions of Uniform Guidance Topics