About This Report

The National Council of University Research Administrators (NCURA) is a national organization of over 7,000 members. NCURA serves its members and advances the field of research administration through education and professional development programs, the sharing of knowledge and experience, and by fostering a professional, collegial, and respected community.

This document focuses on sharing knowledge and experience as a result of the recently conducted review of the research administration area of sponsored programs. Our objectives are to provide the institution with feedback on the institution’s management in support of research and to share recommendations and national best practices that might be considered at the institution.

While the review utilizes the NCURA National Standards, the Reviewers recognize that policies and practices vary at institutions and that not all Standards are applicable to each institution.

The NCURA peer review process is based on interviews with various stakeholders involved in research and research administration areas of sponsored programs. However, the NCURA peer review process does not necessarily validate information or data provided by individuals or departments in preparing this report. Further, the NCURA peer review does not evaluate personnel, nor does it perform an audit function. The results of this review, therefore, should not be used to make human resource decisions. It should not be used to evaluate departments outside the scope of the NCURA review (and is thus limited to use in assessments of Research Administration/Office of Sponsored Programs). Nor can the use of the results help ensure fiscal, regulatory, or ethical compliance with federal, state, or local regulations. The recommendations offered in this review report should not be construed as an exhaustive list as these recommendations necessarily represent an analysis by a particular set of Reviewers and at a single point in time and based on interviews and procedures and processes of certain stakeholders and Research Administration/Office of Sponsored Programs procedures and processes that are contemporaneous to the issuance of this report.

Just as a decision to follow a recommendation cannot ensure regulatory or audit sufficiency, a decision by an institution “not” to adopt one or more recommendations does not necessarily mean that the institution is failing to meet legal requirements. Rather, the recommendations reflect an opinion of peer research administrators who are active in the field and familiar with structures and approaches at other institutions. There may, however, be elements of the local history, environment, or culture of which they may not have been fully cognizant. This document does not provide legal advice.
NCURA does not warrant that the information discussed in this report is legally sufficient.

The **Executive Summary** provides an overview of the report. The **Current Environment for Sponsored Programs** section discusses the many influences and pressures that have recently impacted research administration and created some of the current stresses. The remaining sections provide a detailed discussion of the National Standards as applied to this institution and includes notable practices and recommendations throughout, along with the rationale for each.

NCURA will treat the contents of this report as confidential and will not disclose nor distribute the report outside individuals affiliated with the peer review program. There are no such restrictions on how the institution chooses to utilize the report.

The Reviewers wish to express their gratitude to the staff of the Office of the Vice President for Research, Commercialization and Outreach (ORCO) and the Council of Principal Investigators and Research Administrators (CPIRA) who contributed to the compilation of materials that were provided to the Review Team, as well as to the assistance and hospitality provided during the site visit.
Executive Summary

The National Council of University Research Administrators (NCURA) would like to commend Texas A&M University-Corpus Christi (TAMU-CC) for undertaking an open and comprehensive review of the research administration infrastructure. The strong support for administrative efficiencies and accountability is evident with the decision of institutional leadership and the community to engage in a process that allows all members to participate and contribute.

The NCURA Peer Review Program is premised on the belief that it is a critical part of this review process to include experienced research administrators who have significant careers and are engaged nationally. This external validation allows TAMU-CC to incorporate best practices and models into their final action plans.

An evaluation of the research administration of sponsored programs at TAMU-CC was conducted at the request of Dr. Luis Cifuentes, Vice President for Research, Commercialization and Outreach, and Dr. Miguel Moreno, Chair of the Council of Principal Investigators and Research Administrators. The evaluation was performed in May 2016 (site visit on May 10-12, 2016; Appendix C for the Charge Letter and Appendix D for the site visit itinerary) by a Peer Review Team from NCURA (Appendix B for Bios).

The evaluation was framed by the National Standards (Appendix A) for the research administration of sponsored project activities. These Standards cover institutional expectations and commitments, policies, procedures and education, the central and unit-level operations supporting research and scholarship, and the relationship and
partnerships across all institutional functions. A number of significant areas are summarized in the Executive Summary. NCURA does not prioritize the recommendations, as this is a key part of the institutional process for assessing the recommendations contained in the report.

Texas A&M University-Corpus Christi (TAMU-CC) is a member of the Texas A&M University System (TAMUS). There are eleven universities within the System; it is one of the largest systems of higher education in the U.S. Through the statewide network of the universities, seven state agencies and a comprehensive health science center, the Texas A&M System educates more than 142,000 students. The mission of The Texas A&M University System is to provide education, conduct research, commercialize technology, offer training and deliver services for the people of Texas and beyond through its universities, state agencies and health science center. TAMU-CC joined the Texas A&M University System in 1989 and was established in 1947 as the University of Corpus Christi.

Texas A&M University-Corpus Christi (TAMU-CC) is a diverse Hispanic Serving Institution (HSI) of 11,661 students and more than 690 faculty and 830 staff. There are six Colleges (Business, Education and Human Development, Graduate Studies, Liberal Arts, Nursing and Health Sciences, and Science and Engineering) at TAMU-CC offering numerous bachelors’, masters’, and doctoral degrees, except for the College of Graduate Studies.

TAMU-CC has a number of established centers and institutes. The Conrad Blucher Institute for Surveying and Science is a research institute dedicated to geospatial science. The Harte Institute for Gulf of Mexico Studies is the only marine science research institute dedicated to advancing long term sustainable use and conservation in the Gulf of Mexico. The Lone Star UAS Center of Excellence & Innovation is one of six unmanned aircraft sites in the U.S. designated by the Federal Aviation Administration.

The President of TAMU-CC has clearly articulated and communicated the expectations concerning the importance of research and scholarship. He is very committed to growing the research enterprise and in May 2013 unveiled the Momentum 2015 strategic plan, which spring boarded into Momentum 2020. The heart of the Momentum 2020 plan was the vision statement, "Becoming an emerging research university with unparalleled commitment to every student’s success, closing gaps in achievement, and delivering a robust campus experience." The National Research University Fund (NRUF) was established “to provide a dedicated, independent, and equitable source of funding to enable emerging research universities in this state to achieve national prominence as major research universities.” In order to achieve the aims articulated in the Momentum plans, TAMU-CC is centering their efforts on the eligibility requirements
for the Texas Higher Education Coordinating Board’s “Emerging Research University” status.

The Vice President for Research, Commercialization and Outreach, in partnership with the Chair of the Council of Principal Investigators and Research Administrators, is committed to securing the research excellence of the institution, as well as maintaining operational compliance and viability. With this commitment, the leadership of TAMU-CC wishes to ensure that research operations can sustain a growing portfolio of research and other sponsored programs.

As with any institution where there is an increased attention to research to enhance the teaching mission, TAMU-CC has several infrastructure features that will need attention. Building a strong infrastructure to support a growing and vibrant research enterprise is essential to forward movement especially with the charge to reach Emerging Research University status.

While TAMU-CC continues on its quest to grow its research portfolio, there were some broad themes identified through the NCURA Peer Review that are highlighted here and discussed in greater detail in the report.

Roles and Responsibilities

TAMU-CC is growing rapidly; the working silo-like environment is manageable for small institutions but creates challenges as growth occurs. The University must strategically position itself for process improvement and efficiencies. It is no longer as easy to operate based on personal relationships or rely on few individuals who are jack-of-all-trades. As office functions have become more specialized and the complexity in research administration has grown, the various roles and responsibilities of stakeholders, across the spectrum, have become redundant, resulting in confusion, duplication, and misunderstandings. Process mapping and workflow assessment will be a critical part of sorting through how current practices occur and where there are inefficiencies or redundancies.

In many situations, the Reviewers observed that decision making, including approvals, is retained at the top levels of the organization. Continued growth and diversification of the TAMU-CC research enterprise will place increasing pressures on this model; thus, TAMU-CC should assign the authority for decisions where the organizational responsibilities lie.

The Council of Principal Investigators and Research Administrators (CPIRA) should evolve into a visioning body in an advisory capacity to the Vice President for Research, Commercialization and Outreach and become an engaged partner to prepare the
Institution for the strategic growth of research and commercialization as detailed in Momentum 2020.

Process Improvements and Systems Improvements

To increase efficiency and reduce duplication, process improvements and system improvements should support roles and responsibilities. Currently TAMU-CC has several systems that support research administration. Yet there is a lack of understanding regarding the purpose and functionality of different systems. As TAMU-CC grows its portfolio, the usage of electronic tools to provide efficiencies becomes more critical. TAMU-CC needs to have an institutional approach to assessing the various systems and who has the responsibility for various functions. Effective bridges between all the stakeholders need to be formed in order to permit the sharing of information and to reduce duplication. Timely access to easy-to-find and easy to understand information will facilitate sponsored projects administration for all stakeholders.

Transparency

Open communication must be fostered as it is an integral and critical element in a sponsored research organization. Keeping people informed is challenging for any university. Creating a free-flow of communication across all lines will promote stakeholder engagement. Open communication is more of an issue of trust, in leadership and in decision making, that information is consistent and flowing. There needs to be solutions-based focus on the priorities of managing the research. TAMU-CC will need to provide a consistent delivery method and to target its sponsored projects administration communication consistently.

Training and Local Support

TAMU-CC has to provide consistent opportunities for training and professional development. While some central units have access to external training opportunities, the training is not on a regular basis consistent with their functions.

The Reviewers heard a recurring message that the faculty felt that the lack of support at the college/departmental level was leading to disconnect from the research goals of TAMU-CC. How departments are staffed and funded needs to be considered. There has been progress in the areas of proposal support by TAMU-College Station that has been received favorably. Nevertheless, faculty need support and assistance over the life of a project.

However, the backbone of many successful research enterprises lies with the college/department business managers; these individuals must learn the profession of research administration, regardless of the current amount they work in grants.
management. Developing strong departmental research administrators (DRAs) will minimize the time faculty spend on grant administration and allow them to dedicate more time into research-related endeavors.

**Institutional Commitments and Collaboration**

It is clear that TAMU-CC’s senior leadership, including the Deans, is dedicated to growing the research enterprise. This is evidenced by the hiring of new faculty. However, the formula for the return of IDC is not transparent to the campus, and there is a strong sense on campus that there is inequality in the IDC return. Greater attention to informing the campus about the IDC return will be important. Reviewing the distribution of the IDC to incentivize research will need to be considered.

The notable practices and recommendations from the report are listed throughout the report. Each notable practice or recommendation includes a description and rationale.
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Current Environment for Sponsored Program Operations

Any institution that is focused on developing a more research-intensive program faces a number of challenges. On one front is the challenge to embrace the culture of the institution and those existing or emerging priorities as relate to sponsored program activities. On the other front is the challenge to build or sustain an infrastructure that can nurture, facilitate, and support the growing demands of a research enterprise and meet both faculty expectations and institutional accountability.

Any research enterprise brings a measure of risk, accountability, and oversight to the institution that has not been previously apparent. These measures are in response to a parallel growth in attention by the federal government that is evidenced by escalating policies, regulations, and oversight. This increased involvement of the federal government in sponsored programs oversight has resulted in the need for higher degrees of specialization and education on the part of institutional sponsored programs staff. Institutions now maintain a delicate balancing act between developing the infrastructure for facilitating and moving forward research activities of their faculty and providing sufficient oversight and internal controls to demonstrate accountability and to mitigate risk.

In the last five years, institutions have been especially impacted by the external environment. Reduced funding, increasingly large-scale and multi-disciplinary research, and collaborations with foreign scientists and business have all contributed to complex relationships and issues of ownership. The recent federal attention on institutional operations through audits, whistleblowers, and investigations has not only exposed our institutions to the public, but has brought increasing levels of Congressional attention. The resulting attention on how institutions manage their relationships and the use of the public’s funds often results in tighter institutional controls and more restrictive policies imposed on both the institution and faculty.

Many of our institutions are now recognizing that the growth of infrastructure and specialized expertise has not kept pace with the complexity of the current-day research relationships and the attention to government regulations and policies that are inextricably intertwined with the external funding.

Institutions that are transitioning into a greater focus on research will find that external funding is a double-edged sword. At even a relatively low level of funding, the federal awards carry all the rules, regulations, oversight, and accountability found at the top universities whose research enterprise is in excess of $1 billion dollars. It is critical that an institution have adequate staff, with appropriate training and resources, in place to
handle the administrative burden imposed by accepting external funding. Mistakes in this area can be damaging to both individual and institutional reputations. In addition, sponsored programs offices are responding to deadlines not of their own making. Decisions and administrative actions must often be undertaken with virtually no advanced notice.

The infrastructure supporting sponsored programs is always complex and it requires a periodic review to determine if it efficiently supports the efforts of investigators while also offering an adequate compliance posture with the regulations that underlie federal funding.

This general discussion of the current national environment within which all sponsored programs operations exist and the special challenges for transitioning institutions will serve as a foundation for the more specific discussion of this report.

I. Institutional Commitments

I.A. STANDARD for Institutional and Research Administration Planning.

The institutional priorities and strategic plans as relate to research are clearly articulated and tied to action plans and metrics, defined by research administration, that will support and advance the institutional priorities. The relationship of research strategic goal successes and infrastructure commitments in areas that support research (such as seed or bridge funding, shared cores, release time) is understood by the institutional leadership. An institutional commitment to research and sponsored projects is clearly evident at all levels of the organization as appropriate to the culture, mission, and strategic plans.

One of 11 universities in the Texas A&M System, Texas A&M University-Corpus Christi (TAMU-CC) is a doctoral-granting institution and is federally-designated as a Hispanic Serving Institution (HSI). Historically recognized as a regional teaching campus, TAMU-CC is strategically shifting its culture to that of a rapidly-growing research institution. Reference to this strategic metamorphosis occurs throughout this document, as this visionary shift in ethos provides the context for the following narrative and recommendations.

In addition to this growth, TAMU-CC has experienced changeover in senior leadership in recent years. Recent appointments include the Provost and Vice President for Academic Affairs, the Executive Vice President for Finance and Administration, the Associate Vice President for Information Technology & CIO, the Vice President for Student Affairs, the Dean of the College of Business, and the Dean of the College of Liberal Arts.
In May 2014, TAMU-CC released its strategic plan entitled "Momentum 20/20: A Clear Vision" which outlined an overarching goal to “[b]ecome an emerging research university with an unparalleled commitment to every student’s success, closing gaps in achievement and delivering a robust campus experience.” In order to achieve the aims articulated in Momentum 20/20, TAMU-CC is centering its efforts on the eligibility requirements for “Emerging Research University” status as defined by the Texas Higher Education Coordinating Board. In addition to visibility in Momentum 20/20, the increasing emphasis of research is routinely expressed by institutional leadership and is understood across all TAMU-CC staffing levels. While an expectation of research performance is an increasingly common component in hiring new faculty, such accomplishment is not yet consistent across all colleges and departments in promotion and tenure determinations.

- **Notable Practice:** The role of research at TAMU-CC has been clearly articulated to all stakeholders and is included in its strategic plan, as well as in academic unit statements. University leadership regularly and consistently articulate this priority and all stakeholders with whom the Reviewers met reiterated this position.

- **Recommendation:** The President, Provost, and Vice President for Research and Commercialization (VPRCO) should review promotion and retention expectations across colleges and departments and consistently include grantsmanship, as appropriate.

The research strategic plan supports the institutional imperatives prioritizing sponsored research. However, the existing research strategic plan was written to support the prior institutional strategic plan called Momentum 2015. While many goals and objectives are still relevant and demonstrate support of institutional priorities, the plan should be updated to correspond to Momentum 20/20.

- **Recommendation:** The VPRCO should update the research strategic plan to support the goals and objectives of Momentum 20/20. Additionally, many titles of offices and positions have changed since the existing research strategic plan was written and these should be updated.

Many institutions are directing increased attention to administrative operations. One goal of the Momentum 20/20 plan is “[e]fficiently & effectively achieve the mission of the university.” The President shared that accomplishing this strategy will involve regular program reviews and, given TAMU-CC’s overarching goal of becoming an emerging research institution by 2020, an external review of its research functions and operations is anticipated every five years. There are a number of techniques used by institutions to periodically review the effectiveness of administrative operations, to assess processes for areas of improvement and currency, and to review for compliance or risk. While the form for such review can be either internal or external, the process...
establishes an expectation for attention to operational effectiveness, reviews the success of that operation in a fluid environment, and provides a venue for faculty to comment on process. This NCURA Peer Review represents the first official review of effectiveness conducted by TAMU-CC.

In an effort to incentivize and support research endeavors, TAMU-CC offers a vibrant internal seed program through several different funding sources:

- The Research Enhancement fund supports projects that have a clear sustainability plan but require a jumpstart to get started.
- The Texas Comprehensive Research Fund supports several initiatives:
  - The Program Development Fund supports preliminary research or scholarship for a PI to move into a new field, particularly one that involves interdisciplinary and/or collaborative research.
  - The Proposal Resubmission Incentive supports faculty who have been unsuccessful in securing external funding by offering an opportunity to resubmit their proposal. The resources support any expense that increases the strength of a submission.
  - The Post-Doctoral Support Program provides partial support for post-doctoral researchers.
  - The Proposal Submission Incentive Program funds research-related expenditures and supports activities to encourage researchers who have not recently submitted proposal to do so.
- The International Travel Grant, new in 2016, provides support to researchers to engage in research beyond our borders.
- Higher Education Funds (HEF) support equipment purchases for new faculty start-ups.
- Graduate Assistantship monies support graduate research assistants who are working on mentored projects under new faculty.

While the number and variety of internal funding programs is notable, there does not appear to be a tracking mechanism to demonstrate the funds are meeting intended outcomes. For example, seed funding should lead to external proposal submission.

- **Recommendation:** The VPRCO should implement a system to review and track the success of internal funding programs to ensure the investment is achieving anticipated results.

In addition to seed funding incentives, TAMU-CC is able to provide bridge funding in some circumstances. In order to be eligible, the researcher must provide a plan that
demonstrates a reasonable chance of success, as well as inclusion of a future RFP for anticipated funds. Moreover, the VPRCO may provide funding to visit a program manager.

An additional incentive is the distribution of F&A recovery. The typical distribution at TAMU-CC is 5% to the Principal Investigator (PI), 45% to the dean, and 50% kept centrally. If the award was submitted through an institute, 40% is returned to the institute, 10% to the dean, and 50% is kept centrally.

- **Notable Practice:** TAMU-CC makes available incentives to encourage growth of sponsored research, including seed and bridge funding, and returns a portion of F&A recovery directly to the PI to further advance his/her research endeavors.

However, IDC return accounts “expire” at the end of each fiscal year. While a process exists where a request can be made to carry forward the amount that was swept up, a PI – or Dean, in the case of an institute – is not routinely able to retain funds when planning for equipment replacement or the like.

- **Recommendation:** TAMU-CC should consider allowing PIs/Deans the ability to retain their F&A recovery up to a certain threshold before these accounts are swept. For example, $6,000 for individual PIs ($12,000 for Deans) would provide the PI with adequate funds to purchase equipment and reflects the ratio of F&A recovery currently returned (5% and 10%) to the PI and Dean.

Metrics reflecting data and trends are available on the Research website. While the data is not dynamically updated, the material is regularly referenced by institutional leadership for presentations, comparisons, planning, and evaluation activities. It is accessed via a top-level navigational heading “Faculty Resources” which links to the Research Dashboard. From the Research Dashboard, users can select from the following tabs:

- Proposal Production,
- Award Volume (by college and department, college, institute, Title VI, Community Outreach, and total),
- Funding Source (federal, federal pass-through, local, private, state) from FY 2007 forward,
- Unit Comparisons from FY 2008 forward,
- Expenditures by Activity (academic support, institutional support, instruction, public service, research, scholarships/fellowships, student services) from FY 2007 forward, and
- Restricted Research Expenditures from FY 2007 forward.
• Notable Practice: Through its President’s Research Dashboard, the office of Research, Commercialization, and Outreach (RCO) makes available data that can be used by stakeholders to view and understand institutional metrics.

I.B. STANDARD for Research Administration Organization.

As Texas A&M University-Corpus Christi (TAMU-CC) transitions from a regional teaching campus to an emerging research institution, the institutional priority of sponsored research must be evidenced by the title, oversight, and responsibilities assigned to the chief research officer (CRO). TAMU-CC’s CRO is the Vice President for Research, Commercialization, and Outreach (VPRCO) and this individual is a member of the President’s Cabinet, as well as other institutional advisory boards and leadership councils:

➢ Strategic Planning and Continuous Improvement Council
➢ Coastal Bend Business Innovation Center Advisory Board
➢ Texas A&M University System Federal Relations Task Force
➢ Research Enhancement Committee
➢ University Promotion and Tenure Committee
➢ Texas A&M University System Council of Chief Research Officers

• Notable Practice: The VPRCO represents institutional research concerns and perspectives at the highest level of the University.

While the Council of Deans meets every other week and the Provost allows the VPRCO to address the Council upon request, there is not a regular forum for the VPRCO to interact with academic Deans or department heads. As TAMU-CC’s research portfolio grows and diversifies, the continuous cycling of information among the areas of
research and academics will strengthen the institutional foundation supporting the research enterprise.

- **Recommendation**: The VPRCO should schedule a quarterly forum with the Deans and department heads. Vice presidents for research (VPRs) are in a unique position in that they rely on the research productivity of PIs/researchers who do not report to them. Most PIs report up through an academic department head or college Dean. Thus, a regularly scheduled meeting or open forum for the Deans and department heads – or an invitation for the VPRCO to join the Council of Deans – would provide the VPRCO an avenue to communicate research strategies and share updates to academic leadership, and personally hear and respond to questions and concerns. Such visibility, access, and transparency would support the Momentum 20/20 goal of becoming an emerging research institution.

It is common for vice presidents at Institutions of Higher Education (IHEs) to utilize an advisory committee in order to get input and recommendations on issues affecting their direct stakeholders. Such committees are able to serve as a communication conduit to the vice president. As stated above, this model is in place at TAMU-CC for academic affairs, as evidenced by the Council of Deans.

Research advisory committees are composed of PIs/researchers across the institutional representative disciplines and can be structured in a variety of ways. Because the VPR is the individual who possesses the responsibility and authority to affect change, some may chair the research advisory committee. However, it is also not uncommon for an IHE research advisory committee to be chaired by a PI with the VPR engaging in an ex officio capacity.

TAMU-CC’s Council of Principal Investigators and Research Administrators (CPIRA) operates independently of the VPRCO. Members are elected by their peers for three-year terms and represent their respective college/department or unit. Terms coincide with TAMU-CC’s fiscal year, starting September 1 and ending August 31. CPIRA’s website states that it “consists of individuals elected to represent Principal Investigators and Research Administrators from members of the Texas A&M University-Corpus Christi research community. The Council is committed to the continued improvement of the research environment for students, faculty, and staff. Specifically, CPIRA and the faculty and staff it represents, endeavor to work with administration to provide an effective and efficient university organization, to achieve the goal of being nationally recognized and competitive in research, other sponsored activities and teaching.”
• **Notable Practice:** Unit research administrators are included as members of TAMU-CC’s Council of Principal Investigators and Research Administrators (CPIRA).

CPIRA’s posted goals are to:

- Serve as a conduit between the administration and the research community.
- Identify and provide solutions to issues affecting the research enterprise.
- Meet regularly with administrators via an executive committee.
- Serve on committees, task forces and advisory groups addressing issues affecting the research community.

The Reviewers were advised that if CPIRA wishes to act on an issue affecting the research community, a memo requesting attention or corrective action is sent from the CPIRA chair to the individual responsible for that specific area with a courtesy copy to the VPRCO. Thus, recommendations are put forth by an entity without a formal connection to the VPRCO, the institutional oversight authority responsible for the research enterprise. From all indications, the model under which CPIRA is currently structured has provided a forum for input regarding research operations that has never before been available; however, adding the VPRCO to CPIRA in an ex officio capacity will serve to position CPIRA as a research advisory committee, streamline communication, and expedite resolution to issues that may arise.

• **Recommendation:** CPIRA should consider the value of adding the VPRCO as an ex officio member. Implementing this recommendation will require review of the VPRCO’s service or appointment on other institutional committees or councils. Should any potential conflicts of interest or commitment exist, action must be taken to eliminate or manage them as appropriate. For example, the VPRCO sits on the University Promotion and Tenure Committee. In order for members of CPIRA to speak freely, they must be confident that their opinions and suggestions regarding the research enterprise will not adversely impact their career at TAMU-CC.

The lifecycle of sponsored programs administration is generally considered to encompass proposal development and submission, award acceptance and negotiation, project management, closeout, and audit preparedness. The entities at TAMU-CC involved in this administration are part of the Office of Research, Commercialization and Outreach (ORCO) and include:

- **Research Development.** Under the Associate Vice President for the ORCO, currently a partial appointment held by a faculty member, Research Development consists of two Research Development Officers. Staff meet with researchers to learn their respective areas
of interest and strive to match those interests with potential sources of funding; Research Development also assists stakeholders in understanding eligibility requirements, funding announcements, proposal requirements, and sponsor specifications. As time permits, Research Development reads proposals and offers advice for improvement, and assists in the collection of letters of support and other aspects of proposal coordination.

- **Office of Sponsored Research Administration (OSRA).** The OSRA is involved in pre- and post-award administration. While the majority of pre-award activities are outsourced to Sponsored Research Services (SRS) at Texas A&M University-College Station, where two individuals work with TAMU-CC, the TAMU-CC ORCO Director of the OSRA serves as the liaison between the two entities to facilitate proposal preparation and submission. SRS submits proposals with the Director of the OSRA cited as the TAMU-CC Authorized Official. Thus, awards are received by the TAMU-CC OSRA and negotiated as needed by the Director of the OSRA. The OSRA works with the Accounting Office in the Office of Finance and Administration to set-up accounts. Post-award management is performed by five individuals in the OSRA.

- **Office of Research Compliance (ORC).** Two ORC staff oversee regulatory compliance activities, such as protection of human subjects in research, care and use of animals in research, use of biohazardous materials, export control, and financial conflict of interest. The internal audit and general counsel personnel are Texas A&M University System (TAMUS) employees. Stakeholders reported that it can be difficult to discern which office or individual is responsible for what activity, particularly for those new to TAMU-CC or grantsmanship in general. However, once learned, the TAMU-CC structure seems to work.

Delineation of roles and authority is vital to the success of any administrative operation. TAMUS provides Policy 15.01.01 with the stated purpose to “define sponsored activities and establish roles and responsibilities applicable to sponsored agreements performed by members of The Texas A&M University System.”

In support of System Policy 15.01.01, the ORCO staff are working to finalize a matrix that identifies roles and responsibilities. Activities are listed from the grant lifecycle perspective of proposal submission through closeout. Identified roles include individuals in the unit (PI, Business Manager, Department Head, and Dean), the ORCO, TAMU-CC, and System and level of responsibility is labelled as owner (O) or contributor (C). When complete, it will be posted to the website and stakeholders will be advised that it is available for reference.

- **Recommendation:** The ORCO staff should finalize the draft roles and responsibilities matrix and post to the ORCO website. Providing this information to stakeholders in an easy-to-find/understand format will assist in clarifying research responsibilities and authorities. Examples include:
One of the identified roles in the ORCO matrix is that of the Business Coordinator/Manager, a position at each college. While a roles and responsibilities matrix will help clarify the expectations of award management at the college level, not all current business managers understand or accept that assisting with grantsmanship is part of their duties. Many business managers work in colleges that have little or no sponsored research and, therefore, do not understand what is involved in assisting Principal Investigators (PIs) or researchers with proposal preparation and submission or post-award grant management efforts.

While stakeholders clearly hear and understand and that a goal of TAMU-CC is to achieve the status of an Emerging Research University, concern was expressed from all groups that the institution may not currently possess the infrastructure necessary for success. One specific area of concern is the limited personnel infrastructure at the departmental level. Stakeholders place critical importance on access to competent departmental research administrators (DRAs) at all departments/colleges. Recognizing that the institution is growing its research enterprise, the Reviewers clearly heard that TAMU-CC must invest in competent research administrators at the department levels. These positions will likely differ from the existing business managers as DRA responsibilities need to be rooted in the lifecycle of sponsored programs. Some similarly-sized institutions have implemented a service center model where a DRA position is shared between one, two, or even three departments and supported by pooled F&A recovery returned to these departments.

- **Recommendation:** The VPRCO, working with the Deans and department heads, should create a strategy to support competent departmental research administrator assistance to PIs/researchers in proposal and award management activities. The investment in developing and implementing a strategy to provide skilled DRA positions that focus on and understand grantsmanship may well be the most important investment for TAMU-CC to consider as it strives to grow as an emerging research institution. Researchers must be able to rely on these DRAs to assist with the mechanics of grantsmanship, from proposal preparation and submission to award management, expenditure review, and closeout. Liaising with the pre- and post-award offices, DRAs allow the PIs to focus on what they do best, research performance and productivity.
An additional component of role clarification is to ensure that authority appropriately corresponds with responsibility. TAMU-CC has a document entitled “President’s Delegation of Authority for Contract Administration” that specifies typical routing for department review of documents and institutional authorities. The VPRCO is the signature authority for sponsored agreements. The Review Team was told that the VPRCO has delegated signature authority to the Director of the Office of Sponsored Research Administration (OSRA) for up to $200,000.

- **Recommendation:** The VPRCO should work with appropriate TAMUS and TAMU-CC officials to delegate signature authority for all sponsored activity, regardless of the amount, to the Director of the OSRA so that the authority lies with the responsibility, and make this document available via the website. As the institution grows its sponsored research portfolio, efficiencies will be gained by clarifying responsibilities and authorities in research administration, such as streamlining the signature authority process. Making delegation documents available on the website provides a transparent process that will facilitate award acceptance and clarify other questions of institutional authority.

Grantsmanship is an institutional activity and it is crucial that effective operational relationships exist between the ORCO and other institutional business offices, such as human resources, accounting, procurement, information management, financial and non-financial compliance, and the like. At TAMU-CC, some offices that support research administration are located at the System level in College Station (TAMUS), such as legal counsel and internal audit. In addition to working with TAMU-CC on contracting and compliance issues, both of these TAMUS offices reported working closely together.

- **Notable Practice:** Existing operational relationships between the ORCO and TAMU-CC and TAMUS administrative offices are collegial and cooperative in nature.

Another vital operational relationship is that between research administration and the institution’s fundraising arm. The difference between gifts and grants can be confusing to stakeholders and a strong relationship between these two entities can eliminate confusion and institutional risk.

At TAMU-CC, the development/institutional advancement (Advancement) office is a department of the University that raises funds that flow to the University directly or through the Texas A&M-CC Foundation, an affiliated 501(c).3. Advancement interfaces on a regular basis with ORCO’s Research Development office. Thus, it is not uncommon for Advancement and Research Development to discuss potential submissions at the proposal stage and even meet together with a faculty member to...
assist with planning. If a potential gift is focused to support a research activity or deliverables are specified as part of a gift, it is administered through the OSRA to ensure regulatory compliance requirements are met.

- **Notable Practice:** The relationship between the ORCO and Advancement is open and working well.

However, as the TAMU-CC research portfolio grows, the distinction between research-related gifts and grants may become more difficult to discern for stakeholders. Advancement has prepared a one-page description entitled “Tips for Faculty Working with Foundations and Corporate Relations to Apply for Funding” that identifies when a project would likely go through the OSRA. Preparation of a joint definition will position TAMU-CC to formalize the distinction between research-related gifts and grants, as well as assist in delineating roles, responsibilities, and processes for proper oversight and management of such funds in the future.

- **Recommendation:** Advancement and Research Development should mutually develop a shared checklist or document that both offices reference when speaking with stakeholders about the difference between gifts and grants. As the ORCO web presence for Research Development becomes more robust, this document should be integrated as a resource. Examples:
  
  - Texas A&M-Commerce: [https://www.tamuc.edu/research/forms/ChecklistforDeterminingWhetherFundingisaGiftoraGrant.doc](https://www.tamuc.edu/research/forms/ChecklistforDeterminingWhetherFundingisaGiftoraGrant.doc)

## I.C. STANDARD for Research Administration Staffing.

The institution has invested in sufficient number of staff to support the core functions of the sponsored programs operation and to meet the obligations to sponsors. The institution has an appropriate research administration staffing plan that contains elements of recruitment, retention, and succession for key positions. Clear expectations exist for training appropriate to responsibilities for all level of staff and at central and unit levels.

As TAMU-CC transitions from a regional teaching campus to an emerging research institution, it is important to ensure that staffing is adequate to support and manage the
research enterprise, at both the department and central levels, and that titles and expertise are appropriate.

- **Notable Practice**: TAMU-CC has identified and incorporated key areas necessary to position the institution for growth – namely research, commercialization, and outreach – and these areas are reflected in the position and office titles of the Chief Research Officer. This naming configuration reflects the strategic vision of the institution to grow its research portfolio.

ORCO reported that TAMU-CC Research expenditures for FY 2015 were $23.2 million, as compared to $16.2 million in FY 2011. Administration of these funds falls to a staff of eight:

- two in pre-award via Sponsored Research Services (SRS) of Texas A&M University-College; and,
- six in the Office of Sponsored Research Administration (OSRA), five in post-award plus the Director of the OSRA.

Current staffing levels appear to be appropriate for the existing size of the research portfolio; however, there are efficiencies that can be gained and many will be recommended throughout this document.

While existing central staffing levels may be adequate for the time being, the VPRCO must anticipate future staffing levels, competencies, and compensation needs in order to proactively position TAMU-CC for success.

- **Recommendation**: Working with Human Resources, the VPRCO should perform an annual review of staffing and compensation levels and provide resources to strengthen these as needed, in order to ameliorate risk and meet the increased service requirements of stakeholders. Additionally, consideration must be given to cross-training and succession planning so that any given activity is not one-person deep. This foresight becomes even more important when considering that TAMU-CC is not in close proximity to other institutions; therefore, there is not a large pool of local talent from which to draw.

While existing OSRA staff are knowledgeable about research administration, as well as with the organizational structures and expectations of the sponsors with whom they interact, retention of competent central research administrators is a challenge. Efforts to enhance retention may benefit from the development and implementation of a career path specific to the OSRA. The Review Team recognizes that each employment system is different, however, and that there are more constraints with some than others.
Recommendation: The Director of the OSRA and VPRCO should explore developing a career path for central OSRA staff. One approach may be to tailor components of the training strategy recommended below to reflect achievement milestones that could be built into a career path for central OSRA staff.

As important as adequate staffing levels are to supporting an institution’s research enterprise, equally important is ensuring that central and departmental research administration staff are afforded opportunities for education and development in order to remain current in the profession.

While an established, comprehensive training plan specific to the OSRA staff does not exist, these individuals, as well as some college business managers, attend NCURA meetings, receive and view NCURA’s weekly informational YouTube videos, and participate in webinars specific to research administration.

The Research Development and regulatory compliance staff have also attended conferences specific to their areas of oversight. Moreover, recognizing that communication and interpersonal skills are equally important as transactional skills, the ORCO has contracted with Fred Pryor for such seminars and training.

- **Notable Practice:** The ORCO staff are afforded opportunities for professional and personal development and are able to remain up-to-date on pertinent policies and procedures.

- **Recommendation:** As the research enterprise grows, the Director of the OSRA should develop a training strategy for both central and college business managers, and strive to bridge the needs at the departmental level with the expectations and requirements at the central level. As the institution invests in building robust and competent departmental research administrator DRA staffing, such training will assist in consistent interpretation of TAMUS and institutional policies and procedures, thereby reducing institutional risk.

I.D. STANDARD for Research Administration Resources.

The institution has in place a process to identify changing resource needs for research administration as relates to changes in the institutional priorities and the external environment. Such resources encompass staffing, space, information technology, and financial resources to support the staff in carrying out their sponsor program functions.
Through weekly meetings with the ORCO’s directors, the VPRCO is able to keep a finger on the pulse of the ORCO’s operational and infrastructure requirements. Thus, the VPRCO is able to present specific requests for consideration during the annual institutional budget process.

Technology and equipment requirements for research administration are financed by the VPRCO and maintained and serviced by the central information technology office. While isolated instances of adverse interaction with information technology were reported, IT support, software, and hardware appear to be sufficient for all of the ORCO sectors at the present time. However, such resources must be regularly evaluated and improved as necessary.

- **Recommendation:** As TAMU-CC’s research portfolio grows, the VPRCO must regularly review the ORCO’s IT needs and commit to providing additional resources as necessary to ensure infrastructure requirements are considered and met.

As is common at Institutions of Higher Education (IHEs), space assignment is a challenge. At TAMU-CC, assignment of space is even more challenging because the island campus is, literally, “water-locked.” While the Office of Research Compliance (ORC) staff report that they have individual offices that provide adequate space, the OSRA staff stated that they recently moved from great office space to space that is dispersed and not optimally arranged.

- **Recommendation:** Given the expectation to grow and diversify the research portfolio, the VPRCO should develop a three-year plan to address research administration space needs. For example, the OSRA staff are not in close proximity to each other, which presents an operational disadvantage as it limits the ability to easily discuss common areas of concern and share best practices. Proximity to peers and the ability to easily communicate is particularly beneficial for newer staff.

**II. Institutional Communications**

**II. STANDARD for Institutional Communications.**

The institution recognizes the importance of establishing mechanisms for timely, regular communication regarding sponsored programs trends and activity levels, policies and procedures, expectations, roles and responsibilities, changes in policies, and risk areas. Appropriate lines of communication exist between the institution's senior research administrator and the institution’s
Overall senior leadership team. The institution has defined mechanisms that make available information about research activities and successes to the public. Research administration provides regular communication to faculty and staff as well as opportunities to provide feedback. Current policies and procedures are readily accessible via websites and other means. Strong communications exist between central offices and unit-level staff, where such exists. Research administration periodically assesses the effectiveness of their communication practices.

Most of the communications about research administration issues at Texas A&M University-Corpus Christi (TAMU-CC) is informal and takes place via email, telephone, and face-to-face meetings. While each of these mechanisms is important, there is a need for enhanced and consistent broad-based communications across campus. A common observation across all the groups outside the central offices was a need for more timely and accurate communications and a more customer service orientation for all support staff.

The Review Team recognizes that communication has been impacted by changeover in several key areas. This has affected TAMU-CC at all levels, including leadership, faculty, and staff. Especially given TAMU-CC’s goal of achieving Emerging Research University status, it is critical to engage with all levels and sectors of the research enterprise. Some institutions rely on email blasts, newsletters, and regular open forums/town hall formats. Some vice presidents for research have established Facebook pages and blog sites.

- **Recommendation:** The Vice President for Research, Commercialization and Outreach (VPRCO) should convene a quarterly Town Hall meeting to share updates with the campus community and to hear and engage leadership, faculty, and staff about their research needs and ideas for meeting the goals of the strategic plan.

Deans work independently in visioning and planning research for their colleges, which has the effect of creating a siloed research agenda for the University. Communications with the administration are mostly casual and informal. Information is provided to the colleges and departments when their faculty receive awards and when there are funding opportunities that might be applicable to their college faculty. The Deans whose colleges have productive research were satisfied with what the campus was providing and communicating. Other college Deans were struggling with trying to balance the heavy teaching with the increased pressure of obtaining sponsored funding and expressed concern that “scholarship was being lost with the focus on research.”

- **Recommendation:** The Provost should add research-related issues to the Provost’s Council agenda in order for the Deans to be able to discuss research-related issues in that forum.
- **Recommendation**: The VPRCO should plan and schedule a retreat at which the VPRCO, Deans, and the Council of Principal Investigators and Research Administrators (CPIRA) can discuss the current research environment and envision the future at TAMU-CC. Such conversation will provide a forum for input and ownership for all stakeholders.

With the current goal and emphasis on expanding and diversifying a research portfolio, it becomes increasingly important to have a strong foundation of communication across all the stakeholders: faculty, staff, and administration. A carefully developed communication plan allows research administration to structure how and when communications should occur that will provide the stakeholders with information about processes, policies, sponsor changes, resources, and other essential information. A well-defined plan will provide a cohesive roadmap that represents all elements of research administration (regardless of reporting line) and provides a common framework for ensuring that information is shared in a timely and consistent fashion.

- **Recommendation**: The VPRCO, in consultation with CPIRA in an advisory capacity, should consider developing a research communications plan. Such a communications plan would define expectations for senior and director-level research administrators as to form and type of communications. This plan would define the framework for consistent messaging that can help faculty and staff understand changes before they occur. It would also include the venue and frequency for communications. This would ensure solution-based communication focused on the priorities of managing the research enterprise.

A culture of office communication is a core organizational component that helps all stay efficient, productive, and effective. Open communication is an integral element in a sponsored research organization. There is a need to create a culture of free-flow of communication across all lines, which promotes an engaged organization.

Central office staff spoke about their time constraints and their inability to spend more time in meetings, especially if the meetings do not address their current needs. Yet they uniformly wanted better communication and more training.

College businesses managers/departmental research administrators (DRAs) also report frustration over lack of clear and timely communication with the OSRA staff. They stated that they would welcome regular meetings to address their concerns and needs, and to receive training. The meetings should occur on a regular basis. Agendas should be developed in advance of the meeting to allow everyone to have a chance to have input. At these meetings, the discussion should be about the nuts and bolts of the everyday operations, in order for everyone to understand the total functions of both central and departmental research administration. The meetings should equally include sharing challenges and potential solutions from unit and central operations.
- **Recommendation:** The Director of the Office of Sponsored Research Administration (OSRA) and the research administrator representative of CPIRA should collaboratively plan and hold a quarterly open forum for college business managers to share best practices. Some college business managers have developed effective processes in award management and will welcome an opportunity to discuss and share with others. Such regular meetings could be used for ongoing training, dissemination of critical information, and to enhance staff professional development.

The following are examples of university research administrator working groups:

- The University of North Carolina at Chapel Hill: [http://research.unc.edu/offices/sponsored-research/resources/data_res_osr_rasg/](http://research.unc.edu/offices/sponsored-research/resources/data_res_osr_rasg/)
- Harvard University: [http://research.fas.harvard.edu/training](http://research.fas.harvard.edu/training)
- University of Texas at Austin: [https://research.utexas.edu/osp/resources/research-admin-network/](https://research.utexas.edu/osp/resources/research-admin-network/)
- Rutgers University: [http://postaward.rutgers.edu/grant-management/research-administrators-information-network](http://postaward.rutgers.edu/grant-management/research-administrators-information-network)

Faculty, Deans, and Center/Institute Directors rely on one-on-one communication with the Director of the OSRA and the OSRA staff. There is a considerable amount of information that is repeatedly communicated this way, including policy information and changes to policies, procedural information and changes to procedures, sponsor information, and timelines for receiving information required for review.

While one-on-one communication is important when building a research enterprise, it quickly can become an inefficient and ineffective strategy for disseminating information. The message usually does not reach all key constituents, and it may become distorted or may be given inconsistently. Sustaining this model of communication as research and policies grow can become unreasonable.

Research administration will always contain an element of individual communication and explanation, and should be used when questions arise, though most universities with a portfolio the size of TAMU-CC begin to rely on accurate web-based information and guides to provide basic explanation.

- **Recommendation:** The VPRCO, in conjunction with the Director of the OSRA and input from CPIRA, should create predictable procedures to disseminate information. Some consistent and transparent venues for disseminating information include websites monitored to ensure that information is correct and up to date, regular newsletters, and a listserv that includes all stakeholders.
The OSRA has a website that lists policies and procedures, and forms. It is the main vehicle for the office to post announcements such as changes in policies, procedures, and guidelines. There is a need to enhance the OSRA websites to make it a more useful tool for department administrators and faculty.

- **Recommendation:** The Director of the OSRA should review websites of other institutions for models for web-based communication with departmental research administrators and faculty. This would enhance what could be useful tools for both of these groups ensuring that information is distributed broadly and is transparent and easy to locate.

Example of websites can be found at:

- Arizona State University: [https://researchadmin.asu.edu/](https://researchadmin.asu.edu/)
- University of Alaska Fairbanks: [http://www.uaf.edu/ogca/](http://www.uaf.edu/ogca/)
- James Mason University: [https://www.jmu.edu/sponsoredprograms/about/index.shtml](https://www.jmu.edu/sponsoredprograms/about/index.shtml)
- Vanderbilt University: [http://www.vanderbilt.edu/ocga/](http://www.vanderbilt.edu/ocga/)
- California Institute of Technology: [https://researchadministration.caltech.edu/](https://researchadministration.caltech.edu/)
- Rutgers University: [http://postaward.rutgers.edu/](http://postaward.rutgers.edu/)

Faculty expressed frustration that there is no consistent institutional approach to discussing sponsored programs outside of CPIRA; there is no venue for key stakeholders to engage in dialogue regarding their concerns or needs for sponsored programs. It is essential to give key stakeholders a venue to engage in dialogue regarding their concerns or needs for sponsored programs. There is a perception that problems with sponsored research support are addressed individually, without an institutional or overarching strategy.

- **Recommendation:** Together the VPRCO and Chair of CPIRA should create events to engage in dialogue regarding faculty concerns or needs for sponsored programs. This may be achieved through town hall meetings and other regular meetings.

The OSRA currently does not hold meetings designed to reach out to faulty members, either individually or in groups, in order to obtain insights into faculty interests or to request feedback about the OSRA’s services.

- **Recommendation:** The Director of the OSRA should consider holding small focus groups with faculty to gather feedback about services. It may be
valuable to initially identify two to three primary groups of faculty by reaching out to schedule meetings to discuss the ORCO’s services, identify faculty scientific interests, and provide hands-on sign-up and training for funding opportunity resources. Included in this outreach should be the three to four administrators from the various colleges and departments.

The ORCO and the OSRA do not routinely use a satisfaction survey form. The complaints and dissatisfaction are left to informal conversations and, in cases of greater severity, discussions are elevated to the level of Director or Vice President. In some cases, the root of the complaints is tied directly to the lack of communication and transparency, and would be alleviated by a clarification of roles and responsibilities, more timely access to information, and an opportunity for meaningful engagement.

- **Recommendation:** The ORCO and the OSRA should collaborate on content and employ a rapid online survey tool (e.g., Doodle, Qualtrics, or Survey Monkey) to identify both faculty and staff needs and opinions about improving the communication of research-related information, such as policies, procedures, funding, and updates. Information and other feedback could then be used during focus group meetings for process improvements. For example: [https://www.surveymonkey.com/r/?sm=tHdXTO7pirXuWmUAjxaHLA%3D%3D](https://www.surveymonkey.com/r/?sm=tHdXTO7pirXuWmUAjxaHLA%3D%3D).

Some have posted results on their websites:

- Wayne State University: [http://www.spa.wayne.edu/surveyresults.php](http://www.spa.wayne.edu/surveyresults.php)
- University of California, San Francisco: [https://osr.ucsf.edu/content/2014-research-services-satisfaction-survey-results](https://osr.ucsf.edu/content/2014-research-services-satisfaction-survey-results)

It does not appear the VPRCO holds consistent staff meetings with all staff within the unit. The VPRCO holds meetings with individual departments contained with the department of the VPRCO.

- **Recommendation:** The VPRCO should hold monthly or quarterly meetings with all staff of the ORCO to impart the institutional vision to the both groups and to have discussion about issues in common. These meetings are excellent opportunities for staff to update the group on their key activities.

The OSRA does not have formal meetings. Staff in the OSRA talk to each other on an “as needed” basis when there is a problem. There is a general lack of understanding of the big picture, i.e., “putting it all together,” and there seems to be a knowledge gap between and among staff. The meetings tend to be problem based and are not used for strategic planning of research administration within the research enterprise.
• **Recommendation:** The Director of the OSRA should hold weekly or monthly OSRA staff meetings, and invite all OSRA staff to participate in the development of the agendas so that their concerns and issues are brought to light. Agendas should be developed in advance of the meeting to allow everyone to have a chance to have input into the meetings. Staff meetings might be used as training time for the new members of the office. At these meetings the discussion should be about the nuts and bolts of the everyday operations of the office, in order for everyone to under the total function of the office.

TAMU-CC Marketing and Communications Department (MARCOM) is responsible for coordinating the consistent brand identity of the University. It did not appear that there is linkage and communication between the VPRCO and MARCOM. In the current environment of projected growth, it is important to pursue all avenues to make the TAMU-CC research story successful. An established method to share research information on a regular basis could ensure effectiveness.

• **Recommendation:** VPRCO should provide Marketing & Communication Department (MARCOM) a monthly proposal and award list so that staff could directly engage faculty and highlight their efforts through a variety of vehicles.

### III. Research Administration Policy Development

#### III. STANDARD for Research Administration Policy Development.

| The institution demonstrates a process for policy development that is transparent; for those policies not proscribed externally (such as by specific federal regulation). Policy ownership and the associated approval process are clearly established. |
| Where sufficient research volume and activity warrant unit-level research administration support, the institution has established the relationship of central policy to college, department, or center policy and practice. |

Policies of Institutes of Higher Education (IHEs) are typically high-level documents that briefly define the policy purpose and reference the operational procedures that support it. While policies should be reviewed on a regular basis, they typically are written in a general manner that eliminates the need for routine updates or modifications.

The direction for implementation of policy is found in procedures or guidelines that are referenced or linked from the policy document. Procedures are living documents and
can be readily updated as needed to meet a changing environment. Procedures are usually significantly longer than policy documents as all steps required to meet policy compliance are detailed. Procedure documents typically reference the policy it supports.

While clear policies and procedures are vital to the amelioration of risk across academia, they are critical to the profession of research administration. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), found at 2 CFR 200, places increased emphasis on strong institutional internal controls. Most IHE websites have a link for policies/procedures, as well as links to research-related policies/procedures from their research landing pages. Some examples:

- **University of California-Irvine** > [http://www.policies.uci.edu/](http://www.policies.uci.edu/)

- **University of Indiana** > [http://policies.iu.edu/](http://policies.iu.edu/)
  - IU Office of Research Administration > [http://researchadmin.iu.edu/policies.html](http://researchadmin.iu.edu/policies.html)

- **Washington State University** > [http://www.policies.wsu.edu/](http://www.policies.wsu.edu/)
  - WSU Office of Research [https://research.wsu.edu/office-research/about/](https://research.wsu.edu/office-research/about/)

Locating Texas A&M University-Corpus Christi (TAMU-CC) policies is difficult. There is no obvious link to policies from the main website and using the search feature for “policies” was unsuccessful because the TAMU-CC policies are located on a website titled “University Handbook of Rules & Procedures,” a title which does not contain any form of the word “policies.” Once found, TAMU-CC policies reside on an Academic Affairs website which places institutional responsibility for policies under the purview of the Provost.

- **Recommendation:** The Provost should ensure that a link to the TAMU-CC University Handbook of Rules and Procedures is easily located on the TAMU-CC website. It is important that TAMU-CC make finding and following policies as easy as possible. Thus, the Vice President of Research, Commercialization and Outreach (VPRCO) and other units should establish links to it as well.

The TAMU-CC University Handbook of Rules & Procedures states that “University Rules, Procedures and Statements should be read in conjunction with related Texas A&M University System Policies and Regulations.” A link to those policies/regulations is provided.
• **Notable Practice:** The webpage for the TAMU-CC University Handbook of Rules & Procedures references and links to the overarching System policies.

The Review Team was told that institutional policies are vetted through stakeholder groups such as the Council of Deans and Faculty Senate prior to implementation and, once implemented, the Provost ensures institutional policies are reviewed every five years. Yet, several stakeholders reported that the institution is changing so quickly that the policy process does not always occur in a linear fashion. For example, there have been times where the vetting process appears to have been skipped as stakeholders reported that they learned about a policy after it was implemented. Additionally, it appears many TAMU-CC policies have not been reviewed within five years.

• **Recommendation:** The VPRCO, working with the Provost, should develop a posted procedure/policy that delineates the process for research-related policies and identifies responsibilities and timelines for the creation, vetting, approval, and review of research policies that includes advance stakeholder notification prior to implementation. TAMU-CC is growing rapidly. The policy process needs to become as transparent as possible. Ideally, each institutional policy should contain hyperlinks to corresponding procedures maintained at the unit level.

At TAMU-CC, institutional policies are operationalized by Standard Operating Procedures (SOPs) that are maintained at the corresponding unit level and posted to the unit webpage. These SOPs are designed to be living documents and easily modified to reflect changes in business processes. The Review Team was advised that SOPs are difficult to locate, hyperlinks are broken, and, if found, are often out-of-date.

• **Recommendation:** The VPRCO should task each ORCO unit with ensuring their SOPs are current, contain an exception process when appropriate, and are posted online under an institutionally-consistent navigational link from an appropriate landing page. Ideally, each SOP should link back to the institutional policy it supports. Some of the ORCO SOPs are in place and the Review Team was advised that others are being drafted, such as that for pre-award.

**IV. Program of Education about Sponsored Programs**

**IV. STANDARD for the Program of Education about Sponsored Programs.**
The institution has established programs of education for staff, teaching and research faculty, postdoctoral fellows, and graduate and undergraduate students, as appropriate, regarding institutional and sponsor expectations for the conduct of sponsored programs and research. The institution has on-going educational programs for unit-level (department, college, center, other) research administrators where such exist.

Research administration recognizes the importance of introducing new faculty, staff, senior administrators, and unit-level research administrators to appropriate research resources and information. Mechanisms are in place to identify such individuals.

The profession of research administration is complex and heavily regulated. Learning the process of grantsmanship is difficult, and researchers and departmental research administrators (DRAs) need to understand the lifecycle of sponsored projects, such as:

- availability of funding opportunities,
- eligibility criteria,
- proposal writing and development,
- institutional routing and approvals,
- proposal budget planning and preparation, including F&A,
- proposal submission,
- sponsor terms and conditions,
- award negotiation,
- institutional signature authorities,
- sponsor expectations regarding deliverables,
- cost accounting standards in regard to sponsored expenditures and,
- cost transfers and personnel effort commitments,
- sponsor payment to the institution,
- closeout expectations,
- record retention, and
- internal and external audit concerns.

All of these components are crucial to successfully securing and administering sponsored activities. Thus, a Principal Investigator (PI) must attend to teaching, advising, and service commitments AND his/her sponsored activity responsibilities,
whether research, instruction, or outreach, with a comparable level of knowledge and focus.

Some Institutions of Higher Education (IHEs) have sophisticated education programs for stakeholders to learn about sponsored projects. Some have formalized PI mentoring programs. Others have mandatory PI training. Many rely on their websites as a mechanism to educate stakeholders. Others offer a combination of such efforts. Regardless of the approach, success is achieved when an educational program is matched to an appropriate audience.

Meeting faculty new to Texas A&M University-Corpus Christi (TAMU-CC) is relatively easy at the present time. The Vice President for Research, Commercialization and Outreach (VPRCO) meets with faculty candidates during on-campus interviews. Upon arrival, new faculty participate in an orientation at which the VPRCO presents information. If a PI is relocating to TAMU-CC and transferring an existing award, the transfer process provides the Office of Research, Commercialization and Outreach (ORCO) the conduit for meeting the PI. Considering the current size of the campus community, it is not uncommon for the VPRCO to see new faculty at other campus venues. Additionally, TAMU-CC offers a year-long new faculty orientation through Academic Affair’s Center for Faculty Excellence. One component of this orientation is presented by Research Development. In FY 2015, the ORCO began a Faculty Research Development Program to provide training in all aspects of research development over the course of a year. The program is led by the Associate Vice President for the ORCO and Research Development staff and covers idea development, identification of funding opportunities, proposal development, and project management.

- **Notable Practice:** The ORCO Faculty Research Development Program offers sponsored project training to new and existing faculty and has been well-received by participants.

The Faculty Research Development Program is geared to early-career or high-potential faculty identified by the Deans of each of the five colleges and covers proposal development, grant writing, budget development, and proposal submission. Thus, the focus of this program is to assist researchers in getting grants developed and written. Certainly without a grant portfolio, there is no need to worry about award management; however, improper award management is an area of higher institutional risk. Oftentimes, PIs will purchase an unallowable item simply because they were not exposed to the concept of federal cost accounting standards.

- **Recommendation:** The Director of the Office of Sponsored Research Administration (OSRA) should develop an education component covering award management, closeout, and audit concerns geared to PIs and DRAs.
This informational module should introduce some red-flag concepts of post-award management and could be included in the Faculty Research Development Program, as well as offered as a stand-alone follow-on session for PIs and DRAs following award receipt.

While important that stakeholders can find and understand policies and procedures when needed, as noted under III. Standard for Research Administration Policy Development, equally important is including the role they play in the sponsored programs lifecycle when developing training opportunities.

- **Recommendation:** The Director of the OSRA should review the Faculty Research Development Program and integrate references to and education about relevant institutional policies and procedures. Including policies and procedures in educational modules about sponsored projects provide the “why” that support the “how.”

Additional training sessions are provided by the ORCO that are open to the campus community. Some are national webinars covering the award lifecycle and compliance-related topics or invited speakers. Others are local speakers covering campus-specific training on topics, such as using the mandatory Modular Application for the Electronic Submission and Tracking of Research Operations (Maestro) electronic platform for proposal and award management developed by Texas A&M. The Texas A&M System (TAMUS) offers tutorials via TrainTraq, an online platform that is managed by a Title IX administrator. In addition to tutorials on using the fiscal system, the time and effort module, and training required prior to submission of a conflict of interest disclosure, TrainTraq tracks travel and employee leave.

- **Notable Practice:** The ORCO makes available and supports a variety of educational opportunities specific to sponsored programs for the benefit of central and departmental research administrators and campus stakeholders.

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V. Assessment and Institutional Preparedness

V.A. **STANDARD for Risk Assessment.**

The institution periodically assesses risk tolerance of research activities and emerging risk areas. The institution periodically reviews sponsored program policies and performs appropriate audit and assessment activities. There is an expectation for a regular and thorough assessment of the
effectiveness of the sponsored programs operation. The institution has mechanisms to monitor the national landscape for emerging areas of risk.

Currently, the responsibility for compliance and risk assessment is distributed across several different offices:

- **Vice President for Research, Commercialization and Outreach (VPRCO)** – reports to the President of Texas A&M University-Corpus Christi (TAMU-CC) and oversees pre-award activities (via Texas A&M-College Station Sponsored Research Services), research compliance, research development and commercialization, and post award activities.
  - **Office of Sponsored Research Administration (OSRA)** – reports to the VPRCO and is responsible for limited pre-award activities, as well as financial and non-financial activities resulting from sponsored award terms and conditions.
  - **Office of Research Compliance (ORC)** – reports to the VPRCO and is responsible for providing administrative and operational support to the following areas:
    - Institutional Review Board (IRB)
    - Institutional Animal Care and Use Committee (IACUC)
    - Conflict of Interest (COI)
    - Institutional Biosafety Committee (IBC)
    - Export Control Committee

- **Executive Vice President for Finance and Administration (EVPFA)** – reports to the President of TAMU-CC and oversees all financial business transactions for the University, other than those managed by the VPRCO.
  - **Office of Environmental, Health and Safety** – reports to the Executive Vice President for Finance and Administration and is responsible for the development, implementation, and management of TAMU-CC’s environmental, health and safety programs.

- **Texas A&M System (TAMUS) Office of Internal Audit** – reports to the Board of Regents and is responsible for the internal audit activities for TAMUS.

- **TAMUS Office of General Counsel** – reports to the Chancellor of TAMUS. The office oversees risk management for the entire System and advises in areas of research compliance.

- **Colleges** – report to the TAMU-CC Provost and Vice President for Academic Affairs. Each college possesses some sponsored research in one or more of its constituent departments and is responsible for the financial compliance of day-to-day transactions.
Based on the review of institutional policies, the University’s website, and interviews with members of the offices identified above, clearly TAMU-CC does possess some policies and procedures. However, there are areas where the policies have not been updated or where policies have been written without full consideration of their impact on the research enterprise. These policies, while addressing the risks of a specific issue, can cause frustration and unintended consequences in other operational areas.

There was not a central person, office, or committee for risk assessment or a predictable procedure for how to identify and manage information regarding risk. There are several stakeholders as listed above that need to be included but are not always aware of the activity of the other offices. A few examples of risk areas:

- **Coordination of audit information is critical to ensure a well informed and accurate response to any audit.** There were instances in which General Counsel and Internal Audit had no knowledge of audits that came into the OSRA. At a minimum, when the OSRA receives notice of any upcoming audit related to research or sponsored programs, notification should consistently and immediately be sent to VPRCO, EVPFA, Internal Audit, and General Counsel. The same constituents should receive the outcomes of the audit.

- **There is no formal process for distributing critical information regarding compliance and other potentially risky issues such as new sponsor requirements, external trends in audits and compliance, and risk areas at the national level.** Senior administrators reported that they try to stay abreast of issues, but the distribution of information is not done in a consistent manner.

- **TAMU-CC would benefit from the establishment of an ongoing campus-wide committee to serve in an oversight capacity regarding all aspects of research-related compliance issues.** Issues ranging from pre-award, financial, legal, compliance with federal regulation, and other areas of risk in the research arena should be the responsibility of the committee. The committee could be charged initially with developing a compliance matrix tool, which is used by many institutions. Such committees provide an important risk management resource for the institution and can explore impacts of activities in particular areas with a broad University wide perspective.

- **Recommendation:** The VPRCO, EVPFA, Provost, and Council of Principal Investigators and Research Administrators (CPIRA) should appoint a campus-wide risk management committee to serve as oversight regarding all aspects of research-related compliance issues. The committee should be comprised of individuals who are responsible for the management of risk assessment in their areas and at a minimum would include the OSRA, Internal Audit, regulatory compliance, Environmental, Health & Safety. The committee should be charged with compiling a compliance matrix tool.

Examples of risk committees can be found at:
A compliance matrix identifies the compliance areas throughout the University and the office that is responsible for ensuring compliance. A compliance matrix could be as simple as chart that includes some of the following elements:

- areas involved (e.g. use of humans, monitoring of expenditures, proposals reviewed for University Commitments, federal or state policies referenced in proposal/award terms and conditions that, such as, are committed to being in place by the institution – e.g. Drug Free Workplace)
- responsible University office and individual
- monitoring processes (e.g. committee, individual, or other)
- location of University policies and procedures
- guiding principles (e.g. applicable federal or State regulation, 2 CFR 200 (Uniform Guidance), ethical codes)
- reporting requirements (e.g. filing of assurance/certification/non-compliance/other); frequency of reporting; recipients of reports
- fines, findings, audit results
- training requirements (who, frequency, oversight)

Such a matrix will assist the various units supporting the research enterprise to come together to discuss and understand the compliance areas and their role and responsibilities in mitigating risk. Information from a compliance matrix may additionally be useful to ensure compliance risks are addressed during proposal development, award set-up, and fiscal management. There are numerous varieties and approaches that can be used for a matrix, with some focused on identifying responsible units for an area and others focused on providing a “risk assessment” of the area. Development of a matrix specifically related to the research and scholarly functions would be desirable.

Some examples of compliance matrices are as follows:

- University of California, Berkeley: https://compliance.berkeley.edu/CERC
- The Ohio State University: http://compliance.osu.edu/about-us/our-work/university-risk-management-committee.html
- Princeton University: http://www.princeton.edu/evp/ermc/

Virginia Commonwealth University: http://www.research.vcu.edu/vpr/research_compliance.htm
Stanford University: https://acp.stanford.edu/compliance/compliance-matrix
Boston University: http://www.bu.edu/compliance/compliance-matrix-public/
Princeton University: http://oac.princeton.edu/compliance/matrix

The following publications could serve as additional references and best practices:

- Managing Externally Funded Research Programs: A Guide to Effective Management Practices” It is available on the Governmental Research website at: http://www.cogr.edu/Pubs_EffectiveManagement.cfm
- “Regulation and Compliance 2014. The resource can be found on the NCURA publications website at: http://www.ncura.edu/cvweb/cgi-bin/msascartdll.dll/ProductInfo?PRODUCTCD=40675-037

Although there is no established process to periodically review the overall effectiveness of sponsored research operations, there was a review conducted by an independent outside group in 2009. However, many noted that the report was unavailable to the TAMU-CC University community.

Just as there are regular review cycles for academic programs, there should be a similar review of the ORCO and the units that support the research enterprise. A regular review cycle of these areas would allow TAMU-CC to assess and re-evaluate the effectiveness of the operation and the efficacy of its support for faculty. Reviews should be conducted regularly, following at a minimum an academic program review cycle and possibly more frequently to assist in risk management.

- **Recommendation:** The VPRCO, with input from CPIRA in an advisory capacity, should establish a regular review cycle for research administration functions and oversight areas. There are a number of techniques used by institutions to review the operation of research administration that include external review, faculty surveys, internal audits, and administrative and faculty review committees. Such reviews of sponsored programs will help TAMU-CC assess its progress toward meeting its strategic goals as well as help the University ensure compliance with the ever-changing regulatory environment.

The TAMUS Office of Internal Audit performs an annual, System-wide risk evaluation to assess the risk tolerance of research activities. Each year the System-wide office develops an audit plan for review and approval by the Board of Regents. The audit plan process is based upon management concerns, compliance criteria and the environment.
The TAMUS Office of Internal Audit issued a review of research administration for the TAMU-CC campus in January 2012 and fieldwork was conducted in August and September of 2013. The report noted a number of concerns, including time and effort reporting, approval of reduced F&A rates, adherence to cost sharing procedures, project closeout and reviews of human subjects protocols. In November 2013, TAMUS Office of Internal Audit noted that improvements had been made.

V.B. STANDARD for Institutional Preparedness for Research Disasters or Media Exposure.

The institution has a disaster recovery and emergency preparedness plan. Research activities are included in the plan. The institution periodically assesses its preparedness for disasters and ensures that appropriate areas are informed. As appropriate to the breadth of activity, the institution has a written and communicated media-response plan.

Texas A&M University-Corpus Christi (TAMU-CC) has an Emergency Management Plan (EMP) on the Environmental, Health and Safety website. The EMP was revised in June 2015. The plan is designed to provide the flexible framework for emergency management rather than step-by-step directions for handling every conceivable emergency. According to the plan, University departments involved in emergency management on the campus are responsible for developing internal procedures and training personnel as necessary to support the plan.

The TAMU-CC Emergency Management Plan has defined disaster recovery and emergency procedures for dealing with catastrophic events. These plans include events caused by research, such as biological agent threat incidents, chemical releases, and radioactive materials releases. Also included are plans for communicating procedures to faculty and staff for dealing with catastrophic events. In its emergency management plan, the University has established clear roles and responsibilities.

The plan did not include recovery of research activities following a disaster.

- **Recommendation**: The Emergency Management Plan should be updated to include recovery of research activities.

In addition, TAMC-CC has a Hurricane/Tropical Storm Defense Plan to safeguard students, faculty, and staff and to protect campus facilities in the event of a hurricane/tropical storm.

- **Notable Practice**: TAMU-CC has an easy-to-navigate website that pertains to emergency preparedness, laboratory safety, and training manuals.
Missing from the site are emergency plans when working with animal subjects. The plan should be incorporated into the overall campus emergency plan as well as posted on the ORCO and compliance website.

- **Recommendation:** The Emergency Management Plan should be updated to include working with animal subjects and the management plans for this area should be included on the ORCO and compliance offices website. Inclusion on the website is important, as it ensures the procedures are available to all animal researchers and individuals who might wish to work with animals, either in teaching or research.

The issue of the protection of research and scholarly data is not currently addressed at TAMU-CC. The loss of research/scholarly data can destroy a project; thus, TAMU-CC should consider plans to back-up data and protect the research endeavor. An emergency plan for back-up data should be prepared for the IRB, IACUC, IBC, COI, and other research areas. This should be vetted by the VPRCO. Also emergency plans for research-related areas should periodically be sent to the VPRCO to review areas that should be addressed.

- **Recommendation:** The VPRCO, working with the Chief Information Officer (CIO), should address and write plans for backing-up research data in a campus emergency. It is a considerable risk to a research project if research/scholarly data are lost. A data protection plan should be developed for the institution and identify off-site locations for data.

TAMU-CC does not have an established plan for responding to unexpected research-related media exposure. Some reported that they would report to the VPRCO and then to the Dean or Department Chair.

- **Recommendation:** VPRCO should consider creating, and disseminating to all colleges, a media response plan for research disasters to avoid unexpected research-related media exposure.

### VI. Information Management

#### VI.A. STANDARD for Information Systems Supporting Research Administration.

| The institution has in place appropriate information systems for research administration and sponsored programs and has processes that integrate proposals, awards, financial management, and compliance reviews. Appropriate to the volume of activity, the institution has implemented electronic |
Information systems to help manage the business operations of research administration and sponsored programs should be the foundation of an integrated structure. An information management system to support research administration ideally should provide process improvement assistance for research administration and related areas, capture process and information requirements from end-users and stakeholders, and should maintain quality assurance and integrity data. An information system should, at a minimum, simplify the administrative processes involved from proposal creation to award closeout.

Texas A&M University-Corpus Christi (TAMU-CC) possesses two primary systems that support the research function on the campus: Maestro and FAMIS. The Maestro system was designed to support researchers and research administration across the Texas A&M University System (TAMUS). The information in Maestro is based upon data feeds from the Financial Accounting Management Information System (FAMIS) database. FAMIS is an accounting system that supports the TAMUS system. More specifically, the Maestro system currently manages the following functions:

- Search for funding opportunities
- Create, edit and view proposals
- Obtain internal approvals for application submissions
- View active project information and project negotiation status
- View grant account balances and detailed transactions on funded projects
- Add research interests to database for collaborations
- Search for all awards to TAMUS
- Complete Conflict of Interest disclosures

Most accounting functions are performed using FAMIS or Canopy, the web-based portal of FAMIS. The modules supporting FAMIS are:

- Financial Records Systems (FRS)
- Fixed Assets (FFX)
- Sponsored Research (SPR)
- Annual Financial Reporting (AFR)
The ORCO utilizes Laserfiche for document management. Laserfiche is used as repository for source documents, included are: proposals, award documents, amendments, purchasing documents, budget adjustments, cost transfers, and other grant and contract related documents.

The majority of financial reporting and data queries are done using the TAMUS Data Warehouse/Business Objects software tool. The ORCO manages a local shadow system to assist with the reporting on extramural data information because none of the existing system-wide applications can extrapolate information easily.

Although both systems – FAMIS and Business Objects – are satisfactory as stand-alone systems, they are not fully integrated and require some manual data entry. Difficulties with these systems and data inaccuracies were reported by staff and faculty. At the current volume of research activity at TAMU-CC and the proposed growth, the institution needs to address the integrating of the systems to support research administration and sponsored programs.

- **Recommendation**: The VPRCO, EVPFA, and the Associate Vice President for Information Technology should establish an IT Research working group to review the utilization of the systems supporting the research enterprise. The group should review and address problems with the current system, and review new IT initiatives related to research enterprise. The group will need to meet regularly. In addition, the group should evaluate and determine whether sufficient resources exist to support future research initiatives.

### VI.B. STANDARD for Institutional Management of Research Administration Data.

Accurate and accessible data on sponsored programs activity and management is maintained and protected and the data covers areas of sponsored projects activity that relate to efficiency and research management metrics. Trends in activity over time is tracked and appropriately reported. Policies and processes are in place for data security and data related to classified research. As appropriate to the institution, research administrative data also includes clinical trials, clinical research, and other externally sponsored activities.

There is a constant need to measure and qualify activities and performance of sponsored projects. Institutions need to comply with government mandates and compete for research dollars. Having metrics available to make strategic decisions about whether to build on existing research strengths or to develop new research areas becomes increasing important to academic leadership. Equally important is using metrics to assess quality of services provided to faculty and timeliness of managing information.
Many institutions are pursuing development of data points, or metrics, in the pre-award area to gauge process and performance, as well as to inform senior administrators on the status of the sponsored projects base. As such, these data points are very specific to an institution, but may include a collection of historical data on submissions and awards in order to determine trends in:

- Submission cycles – are there times throughout the year when there are more proposals submitted than others?
- Identification of success, or “hit” rates overall – are specific faculty more successful, or do specific agencies fund more projects at TAMU-CC?
- Award cycles – are there times throughout the year when more awards are received than others, accounting for both state and federal cycles?

Once data is available, decisions can be made about the level of service, identification of new services needed, and scheduling of proposal development workshops so they can be scheduled just before critical cycles. For example, the length of time for processing account set-up is not currently available due to the fact the process is partially completed manually.

- **Recommendation:** The Director of the OSRA, in consultation with the VPRCO, should explore the value of developing metrics that will provide both historical information and future projection of proposal submission and award data. It will be important for the Director to develop reporting metrics that allow monitoring of growth in volume, the ability to predict that growth into the future, and to determine trends in proposal and award development.

At present, the technology used by the OSRA and the VPRCO is at capacity for metric collection. Thus senior leadership is not provided with important tools for assessing the research environment. Currently, the only data collected in Maestro and FAMIS/Canopy are the following:

- Proposals submitted
- Awards received
- Federal Funding Accountability and Transparency Act (FFATA)
- Principal Investigator Information
- Sponsors
- Success rates by PI and Sponsor
- Compliance review requirements and approvals
Technical Reporting and PI Closeout requirements

The following metrics are not being collected nor were evidenced clearly:

- F&A return
- Turnaround times for receipt of proposals from submission
- Turnaround times for receipt of award to set-up, including negotiation
- Volume of activity by staff
- Regulatory training requirements

The following are examples of institutional management of research administration data:

- Indiana University: [http://researchcompliance.iu.edu/ar.html](http://researchcompliance.iu.edu/ar.html)
- University of Washington: [http://www.washington.edu/research/rad/](http://www.washington.edu/research/rad/)

Collecting office performance or sponsor data is also necessary to gauge relevant benchmarks for the institution. The data collected helps measure indicators that will allow for meaningful information as TAMU-CC moves forward on its quest to increase the research volume.

- **Recommendation:** The Director of the OSRA should conduct an analysis of what metrics would be useful to assess the office workload and performance and should put a data collection system in place. This would be helpful for OSRA operations.

The OSRA did not have a documented process to manage confidential data coming into TAMU-CC. The Review Team understood and noted that there are no sponsored projects at the present time that involved data security and/or data related to classified research. Should a situation arise that involves data security issues, the Director of the OSRA should work with TAMUS General Counsel to establish the appropriate processes for handling such information.

- **Recommendation:** The Director of the OSRA, working with the VPRCO and General Counsel, should consider establishing appropriate processes for handling confidential information in the event a situation arises that involves data security issues.
VI.C. STANDARD for Research Administration Data Accessible to Constituents.

Institutional data can be manipulated to respond to internal and external constituent needs. Data and reports are presented in a manner that is easily understood by faculty. Appropriate to the size and volume, institutions make accessible real-time financial data.

An important consideration of any university research enterprise is the availability of data to academic leadership. To be useful, the data must be timely, accurate, and easily obtained. TAMU-CC possesses two separate systems for maintaining and reporting on data essential for efficient research administration and compliance, as noted earlier in VI.A. Standard for Information Systems Supporting Research Administration. Each system provides canned and ad-hoc reporting capabilities.

For the most part, campus administrators remarked they were able to get limited information out of the Maestro and FAMIS/Canopy systems for proposal and award activity. However, the Review Team heard that Principal Investigators (PIs) were unable to get the necessary information about the financial status of their awards from the FAMIS/Canopy system, particularly if they did not have administrative support. Common issues reported to the Review Team included:

- Reports were not updated;
- PIs could not get summarized information;
- PIs could not get detailed information;
- Billing of sponsors was late, but PIs and college and department staff had no way to view the billing status of any particular award unless they contacted the OSRA for the information.

On the other hand, representatives from the Accounting Office and the OSRA were consistent in their comments that FAMIS/Canopy and Business Objects provided reporting with both canned and ad-hoc capabilities.

There is disagreement between the central offices and the college business managers as to what is accurate financial data. Perhaps this is a matter of perception. For example, the FAMIS financial reports intended for PIs were likely designed as the institution’s official statement of record – a look back at what financial activity has already occurred. This would account for the reports being produced in PDF format. These reports are automatically generated and emailed monthly. They can be lengthy and receiving them in PDF instead of excel limits the recipient’s ability to easily sort or manipulate the data. Moreover, because there can be a delay before expenses post to FAMIS, nearly all units maintain some sort of shadow system, often an excel
spreadsheet to which encumbered expenditures are added and tracked until they post to FAMIS.

- **Recommendation:** The VPRCO, working with the Executive Vice President for Finance and Administration, should explore exporting the FAMIS monthly expenditure reports to excel rather than PDF to increase stakeholder usability. Such reports could be pushed via email or kept in a secure central report repository.

However, most PIs and their support staff often need data that is timelier—such as expenses that have been incurred but not yet posted. In addition, PIs and support staff need the ability to make forecasts or projections to assess the future state of their award finances. Furthermore, PIs must develop their budgets and monitor expenditures in relation to those budgets along a specific time line, different reporting formats, and often with specific reporting requirements that incorporate both technical and financial progress. Faculty were consistent in their desire for training in financial management of their awards, in accessing and interpreting financial reports, and in getting staff to support and assist them with the above.

- **Recommendation:** In consultation with the OSRA and CPIRA, EVPFA should develop project financial reports targeted to PIs. Both the institution and sponsors consider the PI primarily responsible for both the technical and financial conduct of an award. It is essential that PIs have access to timely and accurate data in a form they can use in order to assist them in this role.

Given the growing number of PIs at TAMU-CC, it should be a priority to provide PIs with the needed information. Since PIs already use the Maestro and the FAMIS/Canopy systems to obtain their other sponsored project data, and since the OSRA is familiar with sponsor requirements and is accustomed to working with PIs and their support staff, the OSRA could be charged with this task.

- **Recommendation:** The Director of the OSRA and the Executive VP for Finance and Administration office should develop PI-specific training that addresses the essentials of project financial management, including what tools and information are available to them, how to access those tools, and how to interpret financial reports. This training may also include participation by the college and department research administrators (DRAs) who can provide their expertise on the various shadow systems used to provide information for forecasting, projections, and transactions in process.

The OSRA and the ORCO have identified institutional data via the President’s Research Dashboard on the ORCO website. This portal is cited as a Notable Practice under I.A. Standard for Institutional and Research Administration Planning; however,
there is no evidence of reports being regularly distributed to the colleges. Instead, reports are distributed upon request and on an ad hoc basis.

- **Recommendation:** The OSRA should prioritize a set of reports that would be useful information about sponsored programs activity. While some of these reports would only be used within the OSRA, other reports can be shared with the campus leadership. The OSRA should consult with CPIRA on what types and frequency of reports will be useful for the research community.

Some example of institutional data and information being accessed and shared with constituents:

- Emory University: [http://www.ogca.emory.edu/reporting/ora-web-reports/index.html](http://www.ogca.emory.edu/reporting/ora-web-reports/index.html)
- California State University, Northridge/ The University Corporation: [http://www.csun.edu/sponsoredprograms/facts-figures](http://www.csun.edu/sponsoredprograms/facts-figures)

## VII. Institutional Affiliations and Relationships

### VII.A. STANDARD for Research Affiliations with Other Organizations.

The institution has clearly defined all relationships with hospitals or other organizations that are participating or collaborating in research activities. These relationships apply to research activities flowing in through the affiliate as well as flowing out to the affiliate. Defined relationships additionally includes research-related institutional services (such as oversight for regulatory compliance areas such as human or animal research) provided to other organizations.

Principal Investigators (PIs) at research universities have numerous collaborations with individuals and entities at other institutions and organizations. While Texas A&M University-Corpus Christi (TAMU-CC) currently does not have any affiliation agreements in place, as the University realizes its goal of becoming an emerging research institution, it may be helpful to anticipate what will be required and, when appropriate, seek input from the Texas A&M System (TAMUS) General Counsel.

Such agreements must be drafted to adequately protect the institution. Therefore, common considerations include frequency and scope of interaction among the entities, regulatory compliance oversight, facility use, and, if sponsored funding is involved, delineation of responsibilities for billing, accounts receivable, and application or distribution of F&A recovery.
VII.B. STANDARD for Research Affiliations with Non-Employed Individuals.

The institution has clearly defined relationships with individuals who are engaged in conducting research, but who are not employees. Such individuals include visiting scholars, courtesy faculty, or other zero percent appointment individuals who are afforded space and responsibilities associated with research activities.

As TAMU-CC grows its research portfolio, opportunities will emerge to affiliate non-TAMU-CC employees with the University in support of specific research strategies. The Review Team was advised that there is an existing research scientist/fellows track that provides such an affiliation relationship for individuals who are physically on campus; however, a similar process does not exist for affiliations with individuals located elsewhere.

Because there is no institutional policy regarding such affiliation appointments, the Review Team was told that the College of Science and Engineering created a College process to appoint "Research Associates." The appointment grants network access and the capability to submit proposals on behalf of the institution. These individuals are not employees of the University. There is neither monetary compensation associated with the affiliation appointment, nor health insurance or other benefits. Such appointments are approved by the Dean, Department Chair, Provost, and VPRCO.

- **Recommendation:** The VPRCO should work with appropriate institutional authorities, such as TAMUS General Counsel and TAMU-CC Human Resources, to create an institutional definition and a clear process for requesting and approving research affiliations of non-employees with TAMU-CC. Such affiliations must be consistently described in outgoing proposals and a process established to manage/report post-award requirements.

VIII. Sponsored Program Operations: Funding and Proposal Services

VIII.A. STANDARD for Funding Resources.

The institution provides faculty, staff, and students access to information on prospective sponsors (such as federal, state, local, private foundations). These constituents are provided tools and
assistance as appropriate to the culture of the institution, the level of activity, and the relative importance of research in strategic goals.

Identification and dissemination of funding information is an important element for building awareness of the breadth of potential sponsors beyond the most obvious or the most likely ones. This becomes a key service when institutions are building research awareness across the faculty. Active researchers are often constantly looking for alternate or supplemental sponsors to approach; however, faculty new to external funding may be unaware of which sponsors are appropriate for their research interests.

At Texas A&M University-Corpus Christi (TAMU-CC), the Office of Research, Commercialization and Outreach (ORCO) Research Development subscribes to and receives funding opportunity notices on a regular basis from sponsors (federal, state, and private) and other free platforms, such as grants.gov and the Federal Register. Additionally, some funding opportunity information is available in Maestro. The difficulty with manual distribution of funding information by Research Development staff is that it requires an excellent grasp of individual faculty interests, both those faculty who are active in pursuing external funding, and those who are not currently active. Learning and retaining faculty interests in order to individually dissemination information will become unmanageable as the TAMU-CC research enterprise grows and diversifies.

A regular feed of funding possibilities is essential to researchers and allows them to directly assess viable sponsors. There are a number of funding opportunity databases that should be explored to assess the cost-value ratio. These databases span the disciplines from arts and humanities through the sciences. The data services allow an individual to create a profile of interests, defining specific research, scholarship, or creative areas. The service then will electronically feed (daily/weekly) abstracts of funding opportunities that meet that profile. Clearly, the advantage to such a service is that it eliminates the bulk of manual staff effort and allows that effort to be directed to other research development activities. The disadvantage to these services is that, as with literature searches, not every “hit” is a perfect match. Thus, there is some education that needs to supplement use of the system so that users learn how to read, understand, and triage the funding matches sent to them.

Several of these databases are listed below. A number will offer a free trial period suitable for testing the content of information:

- Pivot/Community of Science: http://pivot.cos.com/
- Cazoodle GrantForward: https://www.grantforward.com/index
- GrantSelect: http://grantselect.com/

- **Recommendation:** The Associate VPRCO and Research Development should explore some of the funding opportunity databases for appropriateness and value to the TAMU-CC researchers and consider investing in one in the near future in order to assist in growing research development resources. At a minimum, a trial period should be tried with one or two and thoroughly tested by a group of faculty from different disciplines who load profiles into the systems and provide feedback on their experience. Not only do such platforms provide searchable funding opportunities, many can be customized by users to automatically send email notifications containing funding sources within specific areas of interest. As a result, such systems can free up some Research Development staff time to assist with other areas of research development, such as writing or editing.

Currently, funding opportunities, as well as notices about limited submissions and training/outreach opportunities, are vetted by Research Development for appropriateness before being emailed to the Office of the Provost, where staff then disseminate information via an all-faculty institutional distribution group. If something appears to be college-specific, Research Development will email the item to the college business manager who then distributes within the college.

- **Recommendation:** Research Development should possess the ability to send information via the all-faculty institutional distribution group, and be added to the existing college distribution groups in order to be able to directly forward discipline-specific information to stakeholders. Having direct access to stakeholder groups gains efficiencies and visibility for research development efforts. Such communications should include the ORCO contact information and website links to assist stakeholders in access information and reaching other members of the ORCO staff if required.

Research Development is a relatively new addition to the ORCO, added in 2011 to cultivate new sponsored research by faculty and research scientists, and the Reviewers heard accolades for its services. As Research Development becomes more robust, assessing services and outreach efforts will become vitally important. Additionally, longitudinal metrics will assist the VPRCO in resource allocation.

- **Recommendation:** Research Development staff should consider mechanisms to assess services provided. Assessment metrics will assist in ensuring stakeholder needs are met. While more sophisticated data elements exist, examples of basic data elements include tracking the number of funding opportunities sent to individuals, the number sent to distribution groups, how many one-on-one meetings held, and the number of funding opportunities that
resulted in a proposal. Additionally, as discussed under II. Standard for Institutional Communications, many offices of research administration have developed brief satisfaction surveys that link from each staff member’s email signature in order to capture a “quick pulse” assessment of services.

VIII.B STANDARD for Proposal Assistance.

Appropriate to the size and needs of the institution, assistance is extended to assist faculty and research personnel in responding to funding opportunities and preparing proposals.

In addition to identifying potential sources of funding, Research Development staff routinely meet with stakeholders to assist them in understanding eligibility requirements, funding announcements, and proposal/sponsor requirements. Additionally, staff assist in the collection of letters of support and other aspects of proposal coordination. While Research Development staff would like to read proposals and offer advice for improvement, these activities are done as time permits and staff indicate that there is seldom time to offer much, if any, input.

As TAMU-CC transitions from a regional teaching campus to an emerging research institution, faculty are struggling with grant writing and learning the complexities of grantsmanship. The Review Team learned that external grant writers have assisted on some projects in the past, supported wholly or partially by the VPRCO, but stakeholders were unclear as to the process to request such assistance or how decisions to support it might be made.

- **Notable Practice**: External grant writing assistance has been provided in the past by the ORCO.
- **Recommendation**: The VPRCO should invest in a modest program to provide grant writing assistance, and develop an application process for stakeholders that includes clear institutional expectations as a result of such support. Support for writing, editing, and proposal preparation could be targeted to the development of complex, multi-disciplinary efforts, or individual proposals in some circumstances, and may serve as a companion effort to the relatively new Faculty Research Development Program, about which stakeholders are very enthusiastic.

A key component of proposal assistance is budget development and construction. This assistance typically falls under pre-award activity. At TAMU-CC, pre-award assistance is outsourced to Sponsored Research Services (SRS) of Texas A&M University-College Station. The TAMU-CC Director of the OSRA serves as an on-campus liaison to TAMU-College Station SRS for pre-award activity.
SRS assists PIs with budget development and construction, and inserts appropriate salary and fringe benefits information, and insurance rates. If cost sharing is included, SRS assists with preparation of the cost sharing budget.

Once the overall budget is prepared, SRS emails it to the PI for review and modification if necessary.

- **Notable Practice:** TAMU-College Station SRS provides proposal budget development and construction assistance and stakeholders report being very satisfied with the support provided.
- **Recommendation:** None.

**IX. Sponsored Program Operations:**

**Proposal Review and Submission**

**IX.A. STANDARD for Proposal Review.**

The institution has a consistent approach for reviewing and processing proposals that is in compliance with institutional and sponsor guidelines and requirements. The roles and responsibilities associated with the proposal review and submission activities are clear. Appropriate management systems are in place and the proposal review process interfaces smoothly with regulatory process/systems and the systems/processes for accepting and managing any subsequent awards.

The Director of the Office of Sponsored Research Administration (OSRA) is the Texas A&M University-Corpus Christi (TAMU-CC) pre-award liaison with Sponsored Research Services (SRS) at TAMU-College Station. During proposal preparation and review, communication flows among all institutional parties involved, the Principal Investigator (PI), SRS, and the Director of the OSRA who is cited on proposals as the TAMU-CC Authorized Official.

Part of proposal preparation and review involves recognizing the difference between gifts and grants prior to proposal submission. As noted under I.B. Standard for Research Administration Organization, the relationship between the Office of Research, Commercialization and Outreach (ORCO) and Advancement is working well. Clearly defining the responsibilities and authorities of the ORCO and Advancement, as recommended under I.B. Standard for Research Administration Organization, will assist both entities in recognizing the difference between gift and grant opportunities and, when awarded, appropriately classify and administer funding. As the TAMU-CC research portfolio grows and diversifies, additional processes may need to be
developed to ensure that gifts with a philanthropic intent and grants that require deliverables and detailed fiscal reporting are continuing to be treated appropriately.

- **Recommendation**: The Director of the OSRA should create a five year plan to review TAMU-CC's institutional gift/grant definition and processes to ensure viability and appropriateness. In order to ameliorate institutional risk, activities must be appropriately identified at proposal stage so that they are reviewed and approved via existing internal controls designed to ensure compliance with regulatory research oversight and the like.

Currently, if SRS becomes informed of an award that appears to be a gift but deliverables are cited, staff consult the Director of the OSRA who works with Advancement for determination and institutional acceptance. If something is not discussed prior to submission and a check is received by the OSRA for a philanthropic, research-related proposal submitted by Advancement on behalf of the institution, the OSRA deposits it into a clearing account until necessary information is secured from Advancement so that the OSRA is able to set-up the project in the appropriate systems and create a grant spending account.

- **Notable Practice**: Staff in Advancement, the OSRA, and SRS work together to appropriately classify and administer funding when receiving research-related gifts.

TAMU-CC routing and approvals for sponsored activity are built into the Maestro system. Typical routing includes the PI, Director of the OSRA, department head/center director, Dean, and VPRCO. If institutional cost share is cited, the Accounting Office is also part of the routing and approval process. If the proposal includes issuance of a subaward, documents specific to that subaward are included, such as scope of work (SOW), budget and budget justification, a link to the subrecipient’s F&A rate, and a Subrecipient Commitment Form signed by the subrecipient’s Authorized Official.

- **Notable Practice**: TAMU-College Station SRS has a process in place to review proposed subawards and subrecipient documents prior to prime proposal submission.

As part of data collection within Maestro, the PI accepts responsibility for proposal content and indicates compliance with sponsor and institutional requirements. The PI indicates if the proposed SOW involves any regulatory compliance concerns, such as use of animals, humans, or biohazardous materials. Maestro flags such items for review and alerts both TAMU-College Station SRS and the appropriate institutional authority overseeing the respective area of research compliance.
- **Notable Practice:** The ORCO has a process in place to notify appropriate oversight authorities about regulatory compliance concerns prior to proposal submission.

TAMU-College Station SRS typically works closely with the PI throughout the proposal preparation process. Thus, after the PI releases the proposal for institutional review and approval via Maestro, SRS is poised to perform a final review of the complete proposal to ensure all components of the budget (fringe benefits, insurance, salary information, F&A rate) are included and accurate, and that the proposal complies with sponsor guidelines.

- **Notable Practice:** TAMU-College Station SRS ensures proposals meet sponsor requirements prior to submission.

The Director of the OSRA is notified via Maestro when proposals are released to TAMU-College Station SRS for review. Because the Director serves as the liaison between TAMU-CC PIs and SRS, efficiencies could be gained if the Director was copied on all essential email communication between SRS and PIs. Knowing what is being worked on and in the pipeline for consideration will aid the Director in providing on-campus facilitation as needed.

- **Recommendation:** TAMU-College Station SRS staff should copy the Director of the OSRA on all essential email communication with TAMU-CC PIs when assisting with proposal preparation and submission. Examples include, but are not limited to, communication regarding proposal status updates, issues related to F&A or compliance, and guideline/policy interpretation discrepancies.

Voluntary waivers of F&A recovery are not allowed. A process to request a waiver does exist, however, via an Indirect Cost Waiver Request. The request must cite the unique circumstances and be submitted to and approved by the VPRCO, following approval by the PI, department head/center director, and dean.

- **Notable Practice:** The ORCO does not waive recovery of F&A; however, if warranted, a process exists for consideration of such requests.

TAMU-College Station SRS has established proposal submission lead times to facilitate the submission of proposals. The PI must notify SRS of his/her intent to submit a proposal at least four business days prior to the sponsor submission deadline. Receipt of the proposal, in its complete and finalized form ready for electronic submission, is due to SRS by 3:00 p.m. two business days prior to the sponsor submission deadline. If the proposal is to be mailed, additional days prior to the sponsor submission deadline are required. If a proposal is received after the internal deadline, its review drops in priority. While it may be submitted if time allows, internal
documentation will cite that the proposal was received outside of established deadlines. If awarded, TAMU-CC may elect to decline acceptance of the award if anything in its contents is problematic.

- **Notable Practice**: TAMU-College Station SRS has an internal deadline for submission that is communicated to stakeholders.

After becoming aware of a program solicitation announcement that limits the number of submissions per institution, the ORCO notifies faculty via the website and email, and requests interested individual reply if interested in applying. When the number of submissions from campus exceeds the number of submissions allowed, the ORCO implements a limited submission competition. The process for this competition is shared with stakeholders via the faculty and college email distribution lists. Additionally, the ORCO communicates the limited submission to TAMU-College Station SRS staff and requests notification if anyone submits.

- **Notable Practice**: The ORCO has a transparent process in place to coordinate internal review of proposals for programs limiting the number of submissions per institution.

While TAMU-College Station SRS staff recognize that RFPs, RFBs, RFQs, and BAAs are different types of sponsor solicitations, all proposals are routed and approved via the same institutional mechanisms. Additionally, as noted under VI.B. Standard for Institutional Management of Research Administration Data, TAMU-CC currently does not have any classified research. Thus, mechanisms to identify classified research are currently not in place, nor are policies to manage it. The Director of the OSRA is aware that, if classified research is proposed, procedures will need to be established in order to manage it appropriately.

Proposals cite the Director of the OSRA as the Authorized Official when prepared and submitted by SRS. Thus, the Notice of Grant Award (NOGA) is sent to and received by the OSRA.

- **Notable Practice**: The ORCO has an established process for pre-award to award review transition.

As stated earlier, the Director of the OSRA is the on-campus liaison for pre-award activities and is part of the Maestro proposal approval process. The Director of the OSRA notifies SRS that a proposal was awarded, reviews the NOGA terms and conditions, and negotiates as appropriate, involving TAMUS Offices of General Counsel and Technology Commercialization as appropriate. The Director of the OSRA communicates with the PI to confirm the award is acceptable prior to it being accepted/signed by the Authorized Official.
Signature authority, as noted earlier under I.B. Standard for Research Administration Organization, resides with the VPRCO who has delegated authority to the Director of the OSRA for awards up to $200,000. For award notifications over that amount, the VPRCO is the Authorized Official with signature authority.

- **Recommendation:** None.

**IX.B. STANDARD for Proposal Submission.**

The institution has adequate understanding of submission requirements for electronic and non-electronic proposal submissions. Proposal review and submission activities are outsourced to Sponsored Research Services (SRS) at TAMU-College Station with the TAMU-CC Director of the OSRA serving as the liaison between the two entities. This process has been in place for a number of years and TAMU-CC pays a per proposal processing fee. Proposals are submitted with the Director of the OSRA cited as the TAMU-CC Authorized Official and resulting Notices of Grant Award (NOGA) are received, negotiated, and administered by the OSRA.

SRS staff are well-versed in proposal review and submission. They remain current with electronic research initiatives and successfully prepare and submit proposals to a variety of sponsors using a multitude of sponsor-specific electronic platforms. Institutional registrations/profiles for such platforms are maintained by the Director of the OSRA who grants SRS access.

- **Recommendation:** None.

**X. Sponsored Program Operations: Award Acceptance and Initiation**

**X.A. STANDARD for Award Review and Negotiation.**

The institution has a consistent process to review terms and conditions of grant, contract, and agreement awards. Incoming subawards are reviewed for the terms of the subaward and the flow-through terms of the prime award.
The institution evaluates all awards for sponsor restrictions on such items as the use of funds, appropriate project personnel, publication rights, or intellectual property to ensure compliance with institutional policies that govern the research activities of the campus.

The Office of Sponsored Research Administration (OSRA) reviews around 150 awards per year, primarily from federal agencies, federal pass-through, and other sources of funding.

The award review and negotiation processes are designed to help facilitate the grants and contract process for the Principal Investigators (PIs) while, at the same time, balancing the need to be in compliance with both institutional and sponsor regulations. Award documents take many forms depending upon the type of sponsor and project. Awards up to $200K are reviewed and signed by the Director of the OSRA. Texas A&M University-Corpus Christi (TAMU-CC) has several official institutional representatives authorized to sign on behalf of the University depending on the dollar threshold and the type of document.

Award processing and review includes negotiation (if needed), acceptance of the terms, and obtaining the necessary signatures. If a sponsor needs additional information, the Director of the OSRA acts as the point of contact, coordinating the communication between the sponsor and the PI.

It was noted that the PI is not always involved with the award acceptance procedures, even on some occasions when there have been changes in the scope of work, increases and decreases to the budget, and/or complex terms and conditions which needs the PI’s knowledge and attention.

- **Recommendation**: If an award is issued to TAMU-CC with any deviation from what was proposed, OSRA should work with the PI prior to acceptance to ensure the activity can be successfully completed as proposed.

Each sponsored project award comes with a unique set of terms and conditions, which may range from entirely flexible to quite restrictive. The goals in negotiation are to protect the investigator’s publication and intellectual property rights, to protect the institution against harm from unmanageable stipulations, and to ensure an agreement is in keeping with state and federal regulations as well as TAMU-CC requirements.

If there are complex terms and conditions that need legal advice, RCO leadership has access to the Texas A&M System (TAMUS) General Counsel. If there are any potential issues with the proposed award, the OSRA sometimes contacts the PI and discusses the issue. It was noted by the Review Team that, while TAMUS General Counsel reviews the entire agreement, it would be helpful to have a checklist to help expedite the review process.
- **Recommendation**: The Director of the OSRA should develop an agreement negotiation checklist in collaboration with TAMUS General Counsel. This would expedite the review process and ensure consistency in the review.

- **Recommendation**: TAMUS General Counsel should provide a contract terms and conditions training once a year to the staff of the ORCO to ensure staff are up to date with current language requirements.

While TAMU-CC is the legal recipient of sponsored agreements, and ultimately responsible for the performance of the activities and the proper use of sponsor funds, TAMU-CC cannot meet its responsibilities to the sponsor unless the PI meets his/her obligations. Therefore, it is essential that the PI be kept informed during the award review and negotiations process; this must be a collaborative effort.

The faculty stated they were not always notified of the receipt of an award in the OSRA, unless there was an issue with the award that needed their attention. It is important that faculty and college/department administrators be notified of all incoming awards regardless of issue. This ensures better communication between PIs, colleges/departments, and the OSRA.

- **Recommendation**: The OSRA should establish a system to regularly notify a Principal Investigator of the immediate receipt of an award. This would ensure college administrators are keep abreast of the incoming awards.

Currently, only the Director of the OSRA negotiates awards. It was unclear if other staff in the OSRA had the knowledge base or the experience to negotiate the award; however, with the new staff it is expected that there would be some training in basic contract negotiations and award acceptance procedures. It would greatly benefit the entire office if a checklist of award review procedures was developed.

- **Recommendation**: The OSRA should develop a checklist of all the items that are needed to assess whether an award meets with TAMU-CC’s policies and procedures and sponsor guidelines. A review checklist for awards would be useful to new staff and serve to document staff review and to document high risk terms and conditions.

The Review Team observed that roles and responsibilities and lines of authority were not delignated appropriately. For example, the Director of the OSRA has the responsibility for negotiation but does not have the authority to sign any agreements over $200K. The Director of the OSRA appeared to be familiar with and understand the institutional policies and federal regulations necessary for carrying out her responsibility, including identification of intellectual property, publication, export compliance, and protection of research subjects terms. For any awards over the dollar threshold, they are forwarded to the VPRCO for signature. To have the Director of the
OSRA negotiate and have limited signature authority seems overly burdensome. If the Director of the OSRA has the sponsored programs oversight, the authority must follow such as increasing signing delegation and authority involving all sponsored programs award acceptance as recommended under I.B. Standard for Research Administration Organization.

From a process point of view, not all awards are created equal in terms of risk; for example, an NSF grant is generally a more straightforward federal award than a NASA contract. Communicating award policies and procedures would assist in developing a transparent process and provide PIs the information necessary to better understand the institutional responsibilities involved in award receipt.

- **Recommendation:** The OSRA should update their website to have materials available regarding various aspects of award policies and procedures.

The following are examples of award review checklists:

- University of California, San Francisco: [http://osr.ucsf.edu/review-award](http://osr.ucsf.edu/review-award)
- University of Oregon: [https://OSRA.uoregon.edu/index.cfm?topLevCat=awards&page=AW_02_New_Award_Checklist](https://OSRA.uoregon.edu/index.cfm?topLevCat=awards&page=AW_02_New_Award_Checklist)

Regarding ancillary agreements (e.g. non-disclosure agreements and material transfer agreements); there do not appear to be specific policies and procedures addressing them.

- **Recommendation:** The Office of Research, Commercialization and Outreach (ORCO) should publish instructions on their website explaining the recommended use and processing of non-disclosure agreements and material transfer agreements. Instructions should identify the purpose of the agreements and when they are appropriate. While TAMU-CC may not currently have much activity requiring the use of nondisclosure and material transfer agreements, TAMU-CC’s goal of increasing its research portfolio, including industrial sponsorship, will likely generate much more activity with these types of agreements. Having clear and defined processes will facilitate use and implementation of these agreements.

X.B. STANDARD for Subawards.
Outgoing subawards are reviewed and negotiated to reflect sponsor flow through requirements and institutional policy.

The Office of Sponsored Research Administration (OSRA) issues subcontracts and subawards. Specifically, the Director of the OSRA is tasked to work on this activity. Currently, the Director of the OSRA is authorized to prepare and negotiate subawards, and be responsible for the prime award to determine the appropriate flow-down terms to include in the subaward. The responsibility for preparing the subaward should be delegated to the OSRA staff member responsible for monitoring the subaward. The redistribution of the subaward workload will create consistency in the preparation and the monitoring of the subawards.

- **Recommendation:** The Director of the OSRA should delegate the responsibility of subaward preparation and monitoring to a senior staff member within the OSRA. This would ensure cross-training and would enable the Director to take on other duties related to her responsibilities.

The OSRA does have documented procedures on subawards and monitoring included in the OSRA Standard Operating Procedures (SOP) document. The procedures include sections on the management of subawards, including review, approval, and processing of subrecipient invoices. There is also guidance provided on subrecipient monitoring and risk assessment including the review of the A-133 audit reports. There are procedures in place for reviewing the A-133 audit findings. Within the OSRA SOP documents, there is documentation of conducting risk assessments on subrecipients. The risk assessment is one component to ensure proper stewardship of funds and to ensure performance goals (scope of work or specific aims) are achieved. The terms of the subrecipient relationship should be documented in the subaward. Compliance with the terms and conditions of the agreements should be monitored during the life of the agreement.

The following are examples of subrecipient risk assessments:

- The Federal Demonstration Partnership: [http://sites.nationalacademies.org/PGA/tdp/PGA_063626](http://sites.nationalacademies.org/PGA/tdp/PGA_063626)

- **Recommendation:** The OSRA should update the Subawards/Subcontracts section of the Standard Operating Procedures document to reflect 2 CFR 200 (Uniform Guidance) and to incorporate procedures for conducting risk assessments.
Incoming subawards are reviewed and managed by the OSRA in the same manner as other incoming awards. As the subrecipient of federal funds, the OSRA might be required to provide additional information to a sponsor regarding the institution and any previous audit findings related to a particular award.

The ultimate oversight responsibility for subrecipients remains with the Principal Investigator (PI). The OSRA assists the PI in conducting an effective monitoring process during the proposal submission to the closeout including reporting.

- **Recommendation:** The OSRA should update its website to include documented procedures on subawards and monitoring.

The OSRA utilizes the Federal Demonstration Partnership (FDP) subaward templates for federal funds going to other universities. The FDP created and tested subaward agreement forms are considered the national standard for creating consistency in the administration of federal research awards.

- **Notable Practice:** The OSRA utilizes the FDP subaward template and use FDP guidance for subawards.

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**X.C. STANDARD for Award Acceptance.**

The institution has a process in place that allows the formal acceptance of a sponsored award by designated individuals or offices. The award acceptance process interfaces smoothly with processes for proposal submission and award management.

The award represents a formal obligation by the University. Proposals for Texas A&M University-Corpus Christi (TAMU-CC) are submitted through TAMU-College Station Sponsored Research Services (SRS). The OSRA accepts the awards from sponsors. The OSRA is TAMU-CC’s official office for the receipt of notifications of sponsor or rejection of awards. The OSRA holds responsibility to administer the acceptance of awards according to all applicable policies and procedures.

After the review and negotiation process and the acceptance of the award, the OSRA initiates a New Account Request (NAR) and submits it to the Accounting Office via email for account set-up in FAMIS. The OSRA staff enter additional information in Maestro, linking the award to a proposal.

The OSRA Standard Operating Procedures (SOP) document provides detailed instructions on award activation and notification, including entering award information into the FAMIS system.
**Recommendation:** The OSRA Standard Operating Procedures (SOP) document should be updated to include information on how PI’s are notified once accounts have been set-up in the system.

Compliance with regulatory requirements is a pivotal part of conducting research. The OSRA acts as the fiscal agent and provides services to TAMU-CC faculty with a high level of support and assistance in managing all sponsored projects. The OSRA provides post-award administration and support for externally funded grants, contracts, and cooperative agreements in areas of research, training, and other scholarly activities awarded to TAMU-CC. The OSRA staff indicated no expenses were allowed against a sponsored project account until the award was formally accepted and all compliance requirements were satisfied. Although it was stated as practice that funds were not spent until there is a notification from the Office of Research Compliance (ORC) that all compliance issues were met, there is no formal verification process in place with the OSRA. The current practice is done informally via email.

**Recommendation:** The OSRA and the Office of Research Compliance (ORC) need to work together to develop a consistent system in which accounts are not established nor funds released until regulatory reviews are verified and completed. Another aspect to consider is that compliance approval is not just at award; rather, it occurs for subsequent years of a project. Confirmation that compliance approvals are still in place needs to take place. A checklist should be developed to include compliance review verification such as IRB, IACUC, COI, and RCR.

**X.D. STANDARD for Award Activation and Notification.**

The institution has a defined process to place a sponsored award in the accounting system and to make funds available to the principal investigator for expenditures. The institutional notification process for award activation is timely and clearly conveyed to appropriate positions, such as investigator and unit-level staff.

Once an award has been accepted and executed by the Office of Sponsored Research Administration (OSRA), the award information is entered into the FAMIS and Maestro systems which track all aspects of award terms and conditions, compliance requirements, and account set-up data.

The OSRA Standard Operating Procedures (SOP) document provides detailed instructions on award activation, including entering award information into both TAMU-CC systems, and establishing pre-award spending accounts.
One of the most common complaints from the groups of faculty and center/departamental administrators with whom the Review Team met was the amount of time it took from the point at which the OSRA accepts an award to when it is created in the FAMIS system to when they are notified that an account has been set-up. Establishing metrics as recommended in VI.B. Standard for Institutional Management of Research Administration Data will assist the OSRA in gauging process and performance.

- **Recommendation:** The OSRA Standard Operating Procedures (SOP) should be updated to include information on how and when PI’s are notified once accounts have been set-up in FAMIS.

More specifically, with regard to sponsored account set-up, all information required for FAMIS account creation is available within the system. The OSRA inputs this information since most of the details come from the award document and from their knowledge of sponsor requirements. The Accounting Office acts as a second review of the award terms to ensure that the information provided by the OSRA is correct prior to FAMIS account creation.

- **Recommendation:** The OSRA and the Accounting Office should consider coordinating efforts on the completed award notification documents, perhaps setting up a shared drive. A shared drive will ensure the documents can be accessed by both departments and result in less duplicate documents going back and forth.

- **Recommendation:** The OSRA should consider documenting the procedures for award establishment and notification on their website. This would ensure transparency in the process for PIs and college/department administrators.

**XI. Sponsored Program Operations: Award Management**

**XI.A. STANDARD for Fiscal Management.**

The institution’s control environment provides reasonable assurance regarding the effectiveness and efficiency of operations; reliability of financial reporting, and compliance with applicable laws and regulations. The institution maintains internal controls through processes, systems, and tools to ensure compliance with institutional and sponsor guidelines and requirements. Fiscal data is readily available through published reports, queries, or integrated systems for transaction processing, review and tracking of activities and reporting.
Extramural policies are often broad and written in a manner that leaves room for interpretation. Sponsors expect their funds to be treated in a manner that recognizes specific terms and conditions; however, sponsors also recognize that institutions are able to accomplish their research in a variety of methods under a range of administrative structures. In many areas, both federal and non-federal sponsors rely on the recipient’s own policies and procedures. Within this framework, an institution has the ability to establish its operations, including policies and procedures, to optimize its research enterprise and appropriately allocate resources.

Texas A&M University-Corpus Christi (TAMU-CC) is increasingly evolving from an institution primarily funded by research awards from the Department of Education, the National Science Foundation (NSF) and the National Oceanic and Atmospheric Administration (NOAA). As the number of sponsors and the number of grants, contracts, and cooperative agreements grows, the institution needs to prepare to deal with the different fiscal and programmatic requirements.

Fiscal and administrative duties related to sponsored projects include a variety of accounting and management responsibilities. These include financial transaction audit, financial reporting, invoicing, re-budgeting, and closeout. Equally important to these responsibilities are those duties involving the facilitation of activities of faculty, researchers, and other university administrative units. These facilitations are accomplished by clear and timely communications between the OSRA, the Accounting Office, and its stakeholders.

As TAMU-CC continues its progress towards its strategic goal of increasing and diversifying its research portfolio, it will be important to set clear expectations on roles and responsibilities on an institution-wide basis. Sponsored programs management requires actions by PIs, college and department administration, and the Office of Research, Commercialization and Outreach (ORCO). Duplication of effort or tasks not being performed can strain limited institutional resources.

- **Recommendation:** The Office of Sponsored Research Administration (OSRA) and the Accounting Office should prepare a complete inventory of post-award and financial tasks for all levels of the institution. Both the OSRA and the Accounting Office should compile a list of their respective tasks. In addition, the Vice President for Research, Commercialization and Outreach (VPRCO) and the Executive Vice President for Finance and Administration (EVPFA) should work with the faculty, researchers, centers, and colleges to define expectations for campus responsibilities for these tasks. The definition of tasks and the assignment of responsibilities are the first steps in setting expectations for which constituency or office will be the primary decision-maker and contact point. A sample matrix of roles and responsibilities is attached in Appendix F: Additional Resources.
As the demands for sponsored projects administration grow, it will be important to continue to assess whether the responsibilities are in the hands of the right people. It is also important that resources be provided to maintain appropriate levels of staffing with appropriate amounts of training and expertise.

All institutions are faced with defining the delineation of “pre-award,” “post-award,” and “financial” duties in the assignment of roles and responsibilities. The decision on the dividing lines between these units rests with each University, which must consider its own unique history, culture, and availability of resources. Clearly articulating the delineations between OSRA and the Accounting Office financial management activities will provide greater transparency to stakeholders and improved accountability. It will also provide additional clarity for making decisions regarding staffing and resources.

- **Recommendation:** The VPRCO and the EVPFA should review financial management responsibilities and develop a plan to streamline transaction review and approval between the OSRA and the Accounting Office. The plan should include an assessment of staffing needs. While this division of responsibilities allows the OSRA to focus on invoicing and revenue collection, it has also transferred a critical financial monitoring activity that is typically handled by accounting and finance staff. This leads to delays due to differing interpretations or missed communications between the OSRA and Accounting Office staff. A clear delineation of responsibility needs to be made and communicated to all parties. To initiate this transition, the Director of the OSRA and the Director of Accounting should develop an estimate of the time and resources currently allocated to the transaction reviews. This information is critical in determining the timeline of the transfer of duties.

Many sponsored project activities do not fall into a world of “black and white” decision-making. Policies and procedures need to have an exception process in place. TAMU-CC leadership and management acknowledged several times the need for flexibility. Yet, there is concern by the stakeholders that the balance between enforcing compliance versus providing flexibility has tilted to enforcement. TAMU-CC, in collaboration with Texas A&M System (TAMUS), does have a cost policy regarding charges to grants and contracts that incorporates the appropriate federal requirements. It is not clear that there is a form or specific instructions for dealing with exceptions. Faculty and college/department business managers indicated that the process in place for handling exceptional expenditures ultimately ends up with direct contact with the Director of the OSRA or with the VPRCO for a decision. While such a review process may be manageable at current research levels, it becomes more difficult as research activities expand and diversify. Exception processing should be well documented and clearly communicated to campus units. It also needs to be well understood by the OSRA staff. Because they are charged with the responsibility of enforcing extramural terms and conditions, it can be a challenge for the OSRA staff to have a complete set
of information to make informed decisions and to exercise flexibility based on the specific set of circumstances.

- **Recommendation:** The Director of the OSRA should clearly document and communicate to PIs, centers, and departments the expenditure exception process and provide a consistent written form for approval. Additionally, the process should identify the office and individuals designated as approvers.

Providing customer service related to fiscal management can be difficult. The need for proper stewardship is essential for sponsored funding. Oftentimes, the accounting and fiscal rules are difficult to understand in a research setting. This presents challenges to the OSRA staff who must find the appropriate balance between fiscal compliance and accommodating the research activities. TAMU-CC did not appear to have mechanisms in place to properly segregate research awards and provide the required accounting, invoicing, and reporting. There are policies in place although many of them are not always easily accessible.

- **Recommendation:** The Director of the OSRA should explore options to provide more timely responses to customer inquiries. The responsibilities of award set-up and maintenance, invoicing, financial reporting, pre-audit, closeout, and providing assistance to faculty and college/department administrators result in many deadlines and time constraints. Focusing too much attention in one area can lead to missed deadlines in another. This is particularly true for accounting work, which is tied to strict schedules (such as month-end, end-of-quarter, and year-end). Oftentimes, it is not possible to respond to all of the requests that demand attention. Indeed, lack of timely responses to inquiries was a common critique during the interviews.

- **Recommendation:** The OSRA and the Accounting Office should consider developing electronic reporting tools as a mechanism for providing additional information to faculty, researchers, and campus administrators. The most common information request during the site visit was the availability of copies of invoices sent to sponsors. While invoicing and revenue collection are the responsibilities of the OSRA, being paid by the sponsor is important to all parties at an institution. The ability to view a completed invoice or be informed of its submission provides valuable reassurance to the campus. Since invoicing information exists within the FAMIS system, the OSRA should work with the Accounting Office staff to identify a mechanism that easily makes this possible.

Some examples of documenting fiscal management procedures on a website are listed below:

- Southern Illinois University, Edwardsville: [http://www.siue.edu/orp/externalgrants/fiscal.shtml](http://www.siue.edu/orp/externalgrants/fiscal.shtml)
University of Alaska Fairbanks: [https://www.uaf.edu/ogca/lifecycle/6-management/](https://www.uaf.edu/ogca/lifecycle/6-management/)

Purdue University: [http://www.purdue.edu/business/sps/postaward/](http://www.purdue.edu/business/sps/postaward/)

University of Florida: [http://research.ufl.edu/faculty-and-staff/award-management/fiscal-management.html](http://research.ufl.edu/faculty-and-staff/award-management/fiscal-management.html)

The OSRA has documented procedures on closing out sponsored projects to ensure sponsor compliance within their Standard Operating Procedures (SOP) document but not on their website. These procedures were primarily financially focused; there was little mention of no-cost extensions or carrying over funds to another year of the project requests.

- **Recommendation:** The OSRA should update their website to reflect all the necessary fiscal policies and procedures necessary for management of sponsored projects. Information such as cost sharing, effort reporting, signature authority, closeout to name a few should include assist with the management of sponsored activities for faculty and college/department administrators.

Some examples of documenting closeout procedures on a website are listed below:

- University of Colorado Boulder: [http://www.colorado.edu/ocg/award-closeout](http://www.colorado.edu/ocg/award-closeout)
- University of Alaska Fairbanks: [https://www.uaf.edu/ogca/lifecycle/7-closeout/](https://www.uaf.edu/ogca/lifecycle/7-closeout/)

The OSRA staff were familiar with federal-wide and agency-specific processes for award management and reporting.

- **Notable Practice:** The OSRA staff appeared to have had a sufficient level of understanding and a level of proficiency to ensure effective operations.

TAMUS provides the Single Sign On (SSO) system and basis for certifying salaries charged to accounts in accordance with the relative activity applied to various programs and projects.

TAMU-CC Time and Effort certification is completed bi-annually (Spring and Fall) by the Principal Investigators (PIs) and their designated signature authority. The report reflects activity applicable to each sponsored agreement and to each account/fund in instruction, general operations, and other indirect activities including department administration.
The OSRA staff were familiar with the effort reporting requirements and it was demonstrated they were able to detect instances where certifications were missing or incomplete. The process was not documented on the OSRA website.

- **Recommendation:** The OSRA should include the policy and procedures for effort reporting on their website with links to the TAMUS site.

### XI.B. STANDARD for Administrative Management.

The institution has established management systems for the non-financial administration of awards. The institution has established processes to monitor and report program performance.

In accepting awards, TAMU-CC has the responsibility for meeting all of the technical and financial reporting requirements of the sponsor. Specific interim and final report requirements are usually included in the sponsor’s terms and conditions, other award documents, or in a policy guide or manual. These requirements vary from sponsor to sponsor. Timeliness of final reporting is crucial to sound post award management of a sponsored award to ensure compliance with sponsor requirements and reimbursement for costs incurred. Inability or failure to submit reports within the stipulated time frame can result in the suspension of funding, non-payment of incurred costs, a loss of the ability to submit future proposals, and/or a delay in the release of future funding for the investigator and/or the University.

As previously discussed, the OSRA is also responsible for the non-financial post award management functions at TAMU-CC. Post award management incorporates many tasks beyond financial oversight and accounting. The OSRA provides the oversight to ensure that progress reports are submitted. The OSRA is also responsible for the closeout of awards. The OSRA ensures all financial activity and reports have been completed and correspond with the programmatic/technical reports. The Review Team did not find a process for documenting closeouts on the OSRA website.

- **Recommendation:** The Director of the OSRA should implement regular trainings to ensure staff continue effective use of sponsors’ systems, including for invoicing and reporting.

The OSRA also serves as the intermediary between the Principal Investigators (PIs) and the sponsors in all communications pertaining to administrative changes, including, but not limited to, budget revisions, renewal awards, no-cost extensions, and changes in key personnel.

Record retention policies were noted and documented on the TAMUS website. The OSRA maintains award records in compliance with applicable federal and state laws.
beyond the expiration of the project unless otherwise required by the funding agency. The retention schedule for grant and contract records are maintained by TAMUS.

- **Recommendation:** The VPRCO should ensure record retention and disposition policies and procedures are compatible with research and sponsored programs requirements and, if necessary, revised accordingly. Access of those polices should be linked on the websites of the ORCO.

Examples of other universities record retention policies related to research and sponsored programs are:

- **University of Oregon:** [https://library.uoregon.edu/records/schedule/166-475-0060.html](https://library.uoregon.edu/records/schedule/166-475-0060.html)
- **University of California, Office of the President:** [http://www.ucop.edu/research-graduate-studies/_files/research/policies/documents/retention_disposition_reqs.pdf](http://www.ucop.edu/research-graduate-studies/_files/research/policies/documents/retention_disposition_reqs.pdf)
- **Emory University:** [http://www.osp.emory.edu/handbook/-fin-award-admin/record-retention.html](http://www.osp.emory.edu/handbook/-fin-award-admin/record-retention.html)

There was no evidence of the OSRA having a mechanism in place for verifying compliance with salary obligations. Salary cap information should be noted on the website of the OSRA. There was no evidence the staff knew of sponsor salary cap obligations or of federal agencies that imposed salary caps, however the Review Team acknowledges that there may not yet be salaries that have exceeded this limit.

- **Recommendation:** The OSRA should review the information on salary cap from those sponsors that impose a salary cap restriction. Staff training should center on understanding and reviewing these policies and a process established for applicable sponsors in order to confirm TAMU-CC salaries charged to awards are in compliance.

There was no evidence of the OSRA having a means of validating and following up on all compliance requirements and approvals for annual updates such as IRB and IACUC protocols. The information is tracked in Maestro.

- **Recommendation:** The OSRA and the Office of Research Compliance (ORC) should develop a system where the required approvals related to the regulatory committees will be distributed to the OSRA staff to allow spending authority at the appropriate time of the funding cycle.

The OSRA has documented procedures on closing out sponsored projects contained within their Standard Operating Procedures (SOP) document but not on their website to ensure sponsor compliance is met. These were primarily financially focused. Currently, the Maestro system notifies the PIs via email when their reports are due.
• **Recommendation:** The OSRA should review all shared institutional procedures and policies on award management and document the procedures and procedures. Those procedures should be documented on the website.

The OSRA staff’s familiarity with salary verification and effort reporting requirements was discussed above under XI.A. Standard for Fiscal Management.

The procedures for subrecipient monitoring were limited and did not include monitoring for high risk subrecipients. This was covered in X.B. Standard for Subawards.

### XII. Institutional Integration of Obligations Made with Sponsored Programs Activities

#### XII. STANDARD for Institutional Integration of Obligations Made with Sponsored Programs Activities.

The institution has developed mechanisms to interface separate oversight research areas within the institution that may be related to sponsored program activities. The institution provides appropriate linkages to and tracks commitments made with the acceptance of sponsor funding.

Communication and coordination of data between sponsored programs offices and compliance offices and committees is vital to a successful compliance program. Coordination of the information exchange between the Office of Sponsored Research Administration (OSRA) and the various research compliance functions rests primarily with the OSRA.

In fact, much of the information as to what research compliance issues may apply to a particular project is collected at the proposal stage using the electronic routing in Maestro. Specifically, Maestro routing is started by the Principal Investigator (PI) and is passed electronically through the Chair and Dean, or the Center Director. The PI identifies use of animal subjects, human subjects, ionizing radiation, biohazards, and select agents, as well as potential export compliance and conflict of interest issues.

The proposal process for Texas A&M University-Corpus Christi (TAMU-CC) is coordinated by TAMU-College Station Sponsored Research Services (SRS). During the proposal review process, training status is verified as to whether PIs have completed the training required of all personnel charging to federally sponsored accounts: responsible conduct of research and export compliance, and conflict of interest training (only required for NSF and NIH projects).
The state of the various compliance issues are tracked for each proposal in the Maestro system. The funding status of proposals is communicated to the various compliance committees and/or oversight office as necessary.

Separately, for subawards that are issued by the OSRA, the Subrecipient Commitment Form collects information on conflicts of interests, as well as the protection of humans and the use of animals.

- **Recommendation:** The OSRA and Office of Research Compliance (ORC) should meet monthly to share information to ensure effectiveness of operations between the two offices.

### XIII. Export Controls

#### XIII. STANDARD for Export Controls.

The institution understands the scope of export controls, embargoes and trade sanctions in the context of their institutional activities and in particular to their sponsored programs. Policies and a compliance program for export controls have been developed and are appropriate to the scope of research activities within the institution.

Texas A&M University-Corpus Christi (TAMU-CC) Office of Research, Commercialization and Outreach (ORCO) has clear guidance on export control issues posted on the Research Compliance website; however, there is no link on the Office of Sponsored Research Administration (OSRA) page. In most cases, the information regarding export controls is needed at the proposal or award.

- **Recommendation:** The OSRA website should have a link to the Export Controls website. The information will assist the research community when inquiring about export controls.

Export controls requirements placed on universities are very challenging and difficult to understand. Understanding these laws and applying them correctly require a knowledge about national security and commercial regulations that can directly conflict with academic freedom, as well as the publication and dissemination of research findings and results even via a website.

Knowledge regarding export controls and deemed exports is critical in avoiding situations that trigger these regulations and in complying with those that are absolutely necessary. The federal government imposes severe criminal and civil fines for noncompliance.
Terms and conditions on research awards, procurement agreements, and licensing agreements can all create an export control issue. It is essential that all parties involved in any of these activities be aware of, and are trained in, this area. The Collaborative Institutional Training Initiative (CITI) has a training module on Export Controls that could be useful.

- **Recommendation:** The Vice President for Research, Commercialization and Outreach (VPRCO), along with the Research Compliance and Export Control Officer, should consider using the CITI Export Control Module as another source for training.

- **Recommendation:** The OSRA staff should consider taking Export Control training. The training will enable the staff to recognize when export control could be an issue on research awards and other related agreements.

## XIV. Research Integrity

### XIV.A. STANDARD for Research Misconduct.

The institution has policies and procedures that govern research misconduct. The research misconduct policy and procedures follow established federal standards, providing notification to sponsors, communication to the parties involved, and protection for whistleblowers.

The Texas A&M University System (TAMUS) and Texas A&M University-Corpus Christi (TAMU-CC) have in place policies and procedures regarding the reviewing and reporting of allegations of research misconduct that align with federal standards and integrate with the Office of Research, Commercialization and Outreach (ORCO). TAMU-CC Policy 15.99.03.C1 *Ethics in research and Scholarship* identify that allegations of misconduct should be reported in writing to the Vice President for Research, Commercialization and Outreach (VPRCO) who is the Designated Officer for carrying out requirements of both TAMU-CC policy and TAMUS Policy 15.99.03 *Ethics in Research, Scholarship and Creative Work*.


TAMUS Policy 15.99.03 directs that, in cases involving external funding for research, scholarship, or creative work, the VPRCO shall notify sponsors about the status of
investigations in accordance with the applicable rules and regulations of the funding entities. The Policy additionally specifies that, in cases involving sponsored funds from any entity of the Public Health Service, the VPRCO shall notify the Office of Research Integrity (ORI) per 42 CFR 50. Similarly, should funds from the National Science Foundation be involved, the VPRCO shall notify the NSF Office of the Inspector General per 45 CFR 689. The ORCO has in place Research Misconduct Standard Operating Procedures (SOP) that, in addition to identifying the VPRCO as the Designated Officer, identifies the TAMU-CC Deciding Official as the Provost and Vice President for Academic Affairs. The SOP includes responsibilities for preliminary assessment, inquiry, and investigation.

With the size of TAMU-CC’s current research portfolio, and the fact that the Designated Officer is the VPRCO, it is anticipated that communication with the Director of the OSRA would occur organically so that the Director would thereby be informed about individuals under investigation. However, as the research enterprise grows and diversifies, clarifying this communication in the SOP in respect to potential submission ramifications would be helpful.

- **Recommendation:** The VPRCO should modify the Research Misconduct Standard Operating Procedures (SOP) to include language that specifies when the Office of Sponsored Research Administration (OSRA) is notified of a misconduct investigation and thereby able to increase oversight as appropriate.

**XIV.B. STANDARD for Financial Conflict of Interest.**

The institution has policies and procedures that govern individual financial conflict of interests. Conflict of interest policies require the disclosure and review of financial interests as defined, at a minimum, by federal regulations and policy. The institution shares information on financial disclosures and review outcomes across administrative and academic offices as appropriate.

Texas A&M University System (TAMUS) has a policy in place for faculty and staff to determine whether their financial relationships and interests conflict with their primary research responsibilities. The policy is currently only applicable to researchers on NIH or NSF funding, although the expectation is that it will be expanded to cover all funding sources. The Conflict of Interest (COI) Official for TAMU-CC is the VPRCO.

If there is any potential Financial Conflict of Interest (FCOI), the FCOI is reviewed by the Office of Research Compliance (ORC) including the COI Official. If an FCOI exists, ORC works with the Principal Investigator (PI) to develop a management plan specifying the steps to be taken to manage, reduce, or eliminate the FCOI. At this time,
the COI for TAMU-CC is minimal and the institutional does not warrant a standing committee.

In addition, Texas A&M University-Corpus Christi (TAMU-CC) utilizes the TrainTraq module for FCOI training. All investigators, co-principal investigators, and project directors must complete the training prior to engaging in sponsored research.

The Conflict of Interest policy and procedures are well documented on the ORCO website. The ORC notifies the OSRA if there is FCOI management plan in place impacting a faculty member and his sponsored project.

- **Recommendation:** None.

**XV. PROTECTION AND OVERSIGHT RELATED TO RESEARCH ACTIVITIES**

**XV.A. STANDARD for Use of Humans in Research.**

| The institution has effective systems in place that comply with federal and state regulations for the ethical protection of human subjects. |

Texas A&M University-Corpus Christi (TAMU-CC) has a U.S. Department of Health and Human Services (DHHS) Federal-Wide Assurance for human research and has in place an Institutional Review Board (IRB) for the Protection of Human Subjects that complies with federal guidelines. The Vice President for Research, Commercialization and Outreach (VPRCO) is the Institutional Official for the IRB and has the authority to ensure that all obligations of the human research protections program (HRPP) are carried out effectively and efficiently. Oversight of the IRB and other TAMU-CC regulatory compliance committees is performed by the Office of Research, Commercialization and Outreach (ORCO) Research Compliance and Export Control Officer. Open communication exists among the VPRCO, the Research Compliance and Export Control Officer, and the Chair of the IRB.

IRB protocols that are most often reviewed involve unfunded studies to evaluate teaching methods and perceptions of student teaching. Should an activity scope overlap into an additional regulatory compliance committee, such as a protocol involving both humans and animals, the Research Compliance and Export Control Officer would coordinate as necessary. The IRB meets monthly, except for January. Members are educated about their responsibilities via CITI (Collaborative Institutional Training Initiative).
Financial interests of institutional research personnel are captured during the annual disclosure process via TrainTraq. While TAMU-CC has not yet had a protocol where such financial interests have had to be disclosed in the IRB informed consent process, the Office of Research Compliance (ORC) staff do not have a mechanism to monitor potential financial conflict of interest.

- **Recommendation:** Working with ORC, the VPRCO should support a system, such as a third-party platform like Kuali Coeus or a reporting enhancement to TrainTraq, to monitor and track regulatory compliance. A reporting tool would ameliorate institutional risk as ORC would be able to query the status of FCOI disclosures, and other regulatory compliance training requirements, in order to respond proactively instead of reactively.

### XV.B. STANDARD for Use of Animals in Research.

The institution has effective systems in place that comply with federal and state regulations for the ethical protection for the humane care and use of animals.

While no animals are kept onsite, TAMU-CC has activities that involve animal use, such as teaching and laboratory research protocols with fish, and wildlife research with fish or marine mammals. While a U.S. Department of Agriculture (USDA) registration is not needed because of the types of animals used at TAMU-CC at this time, the institution has a written assurance with the U.S. Department of Health and Human Services (DHHS) and an Institutional Animal Care and Use Committee (IACUC) that meets federal guidelines.

Oversight of the IACUC and other TAMU-CC regulatory compliance committees is performed by the ORCO Research Compliance and Export Control Officer. The VPRCO is the Institutional Official for the IACUC and has the authority to ensure that all obligations are carried out effectively and efficiently. Open communication exists among the VPRCO, the Research Compliance and Export Control Officer, and the Chair of the IACUC.

The attending veterinarian sits on the IACUC and is not a TAMU-CC employee. Members are educated about their responsibilities via CITI (Collaborative Institutional Training Initiative).

The IACUC meets at least once every six months for the Semiannual Program Review and Facility Inspections. The IACUC also meets as needed to review protocols for full board review.
Should an activity scope overlap into an additional regulatory compliance committee, such as a protocol involving both animals and humans, the Research Compliance and Export Control Officer would coordinate as necessary. TAMU-CC is revising its occupational health program to meet regulatory compliance requirements and better meet the needs of animal users. Mechanisms will be put in place to better track, report, and maintain compliance.

- **Recommendation:** None.

**XV.C. STANDARD for Biohazards and Select Agents.**

The institution has policies and procedures in place governing the safe handling and use of biohazards, including rDNA, infectious agents and blood-borne pathogens, and select agents in research, clinical and teaching activities. The accepted biosafety level at the institution is explicitly addressed in policy and guidance. The Institutional Biosafety Committee is clearly defined in policy and operates effectively with other administrative offices.

Texas A&M University- Corpus Christi (TAMU-CC) has level BSL-1 and BSL-2 laboratories. The number of research proposals utilizing these laboratories is minimal at this time with one or two per year. The Institutional Biosafety Committee (IBC) reviews and oversees all recombinant DNA, infectious diseases, and toxin research for TAMU-CC. The Institutional Official is the Vice President of Research, Commercialization and Outreach (VPRCO).

The IBC has a policies and procedure manual that documents the responsibilities, protocol/ modification submission and review, meeting process, reporting requirements, non-compliance, training and record retention.

Members of the IBC receive their training through the Collaborative Institutional Training Initiative (CITI).

IBC policies and procedures are well documented on the ORCO website.

- **Recommendation:** The Biosafety website will need to be updated to reflect the VPRCO as the Institutional Official. Currently, the Provost/Vice President for Academic Affairs is listed on the main web page.

**XV.D. STANDARD for Radiation and Laser Safety.**
The institution has policies and procedures in place governing the safe use of radiation and lasers in research and sponsored activities in compliance with federal and state regulations. Adequate staff and other resources are dedicated to training, oversight, and preparedness for laser or radiation-related emergencies.

Texas A&M University-Corpus Christi (TAMU-CC) currently does not have any research involving radiation or lasers. However, should such research be proposed in the future, policies, procedures and processes will need to be established to ensure it is managed appropriately.

- **Recommendation:** None.

### XV.E. STANDARD for Specialized Research Activities.

The institution has appropriate safeguards in place for research activities that are a part of research and other sponsored activities and require specialized oversight such as diving, boating, flight safety, or mining.

Texas A&M University-Corpus Christi (TAMU-CC) Lone Star Unmanned Aircraft System (UAS) Center of Excellence & Innovation (LSUASC) was one of six sites nationally established by the 2012 FAA Modernization and Reform Act to work with the Federal Aviation Administration (FAA).

As a designated site, LSUASC is mandated by Congress to assist the FAA in developing policies, procedures, and technical solutions that will enable safe integration of remotely-piloted aircrafts into the national airspace system. The test sites are designed to collect operational data for the FAA and to assist UAS manufacturers and technology developers with research, development and commercialization of their products.

The research goals of the FAA, along with the test sites, are to develop research findings and operational experiences to help ensure the safe integration of the UAS into the nation’s airspace. As a result of the unique nature of research, this opens up prospects to collaborate with industry partners in developing commercialization opportunities.

- **Recommendation:** None.

### XV.F. STANDARD for Maintaining Currency in Field.

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Institutional expectations are clear that the staff involved with protection and oversight related to research activities maintain currency in their understanding of governing regulations and policy.

The VPRCO supports opportunities for professional development for the Office of Research Compliance (ORC) staff and approves requests to attend conferences and other forums. Such opportunities allow staff to remain current on changes to federal and state regulations and sponsor policy.

ORC staff are knowledgeable about areas of institutional regulatory compliance, are able to contact appropriate oversight entities with questions as appropriate, and effectively interact with TAMU-CC researchers regarding routine issues or to provide notification about new policies or procedures.

- **Recommendation:** None.
Appendix A: National Standards for Effective Sponsored Program Operations

The National Council of University Research Administrators (NCURA) developed these National Standards to represent the institutional baselines that provide a supportive environment for the conduct of research and other sponsored activities as well as the broad operational and core functional areas of sponsored programs management.

Unlike an audit, this peer review performs an assessment of your research administration “program” that goes beyond merely highlighting deficiencies in process. The assessment contains three interrelated features: senior and experienced research administrator Reviewers, the National Standards, and a philosophical approach that provides consistency in the review process with an understanding of institutional culture. These key features result in an assessment of effectiveness of sponsored research environments at the institutions undergoing peer review.

The NCURA National Standards are used by experienced and senior research administrators to assess the effectiveness of the research administration program. While recognizing that institutions differ in organizational structure and institutional priorities, these Standards reflect how the institution integrates the research enterprise with its institutional goals and expectations and operationalizes effective sponsored programs administration. The Standards allow Reviewers to assess how closely that integration relates to institutional and stakeholder goals and expectations. The Standards contain a list of over 165 features that are utilized by the Reviewers during their assessment and that are used as the basis for the written report.
Appendix B: NCURA Peer Review Team Bios

The National Council of University Research Administrators offers a formal system of assessment for offices of sponsored programs. As an international organization that supports the field of research administration, this formal assessment program provides information on effective practices, techniques for success, and models of excellence. Setting standards and identifying quality of organizational performance are expected functions of all organizations.

Rosemary Madnick, TEAM LEAD
Number of Years in Research Administration: 24
Institutions: University of Alaska Fairbanks, Los Angeles Biomedical Research Institute, Charles Drew University of Medicine and Science, University of California, San Diego, Los Angeles County, Department of Health Services

Rosemary Madnick is Executive Director for the Office of Grants and Contracts Administration at the University of Alaska Fairbanks. In her current position, she is responsible for both pre- and post-award administration of approximately $1.77 million in annual sponsored project awards. Her experience with grants and contracts management at various institutions has provided her with more than 24 years of knowledge in research administration.

Her experience has given her distinct skills in research, development and evaluation of policies and programs as well as the know-how in investigating and analyzing problems with broad impact using data to develop sound decisions.

As a senior research administrator, she provided consultation and guidance on all aspects of sponsored program administration including development of research policies and procedures, resolution of grant and contract issues internally and externally. She has represented her institutions on site visits and with funding agencies. In addition, she is also been involved in strategic implementation of new organizational structures to support grants and contracts operations and implementation of activities requiring facilitation and change management activities. She is a member of the Federal Demonstration Partnership (FDP).

Past positions included Assistant Vice President, Office of Research Administration at Los Angeles Biomedical Research Institute where she managed the pre and post awards sponsored projects including clinical trials; Director of Grants, Contracts and Compliance at Charles Drew University of Medicine and Science; and Department Administrator for University of California, San Diego.

She has been a member of NCURA since 1998. She served and held a number of positions at the regional level such as Region VI LEAD Me Program Team of Mentors and past chair of Region VI in 2012. She has also held positions on national committees including National Leadership Development Committee and (NLDC), Professional Development Committee and a number of program committees. She has presented workshops and sessions and evaluated workshops at both regional and national meetings. She is a graduate of NCURA’s Executive Leadership Program.

In addition to serving as a NCURA peer reviewer, Rosemary is part of the NCURA faculty who teach on the fundamentals of research administration. She is also a contributor for the NCURA’s Magazine.
Judy Fredenberg

Number of Years in Research Administration: 24
Institutions: University of Montana

Judy Fredenberg, MPA, is the director of the Office of Research and Sponsored Programs (ORSP) at the University of Montana. ORSP is a combined pre- and post-award operation that encompasses proposal development through grant close-out.

Overseeing all aspects of sponsored programs, Judy was involved in the development and implementation of a web-based electronic routing and approval platform. Other areas of focus have included process improvement and efficiency, policy review, and communication strategies. She is a past chair of the Institutional Review Board for the Protection of Human Subjects and routinely advises on other institutional compliance issues.

Judy has 35 years of experience in higher education with 24 in university research administration. She has served on numerous university committees and worked extensively with faculty, staff, and administrators. She has experience in federal relations and was active in APLU’s Council on Governmental Affairs (CGA) and the Council on Governmental Affairs (COGR). Her diverse academic experience affords a unique institutional perspective with emphasis in policy and program development, communication, and facilitation.

A past president of the National Council of University Research Administrators, Judy is currently a workshop faculty member for NCURA Fundamentals of Research Administration, a member of the Select Committee on Global Affairs, and guest author for the NCURA Magazine. In addition to chairing NCURA’s Board of Directors, the Nominating and Leadership Development Committee, and a national annual meeting, Judy has served on many NCURA national and regional committees as an NCURA regional officer and chair, and given a multitude of presentations to local, regional, and national audiences. Judy received the NCURA Julia Jacobsen Distinguished Service Award in 2013.
Assisting the Review Team and Reader for Review Report

Peggy S. Lowry, Director, NCURA Peer Programs

Number of Years in Research Administration: 30

Institutions: University of Illinois at Urbana-Champaign, Oregon State University, Ball State University, Murray State University

Peggy has been a team member or team lead on over 30 peer reviews of research administration offices, received evaluations of her offices, and has taught national workshops on sponsored program assessment. Peggy has led office self-studies and participated in institutional accreditation self-studies. She authored the chapter: “Assessing the Sponsored Research Office” (NCURA/AIS Sponsored Research Administration—A Guide to Effective Strategies and Recommended Practices) and published peer review articles: “But the Emperor Has No Clothes On! Or Assessing Your Operation with Fresh Eyes” and “Learning Your ABC’s: Adaptability, Balance, and Culture” (NCURA Magazine). Peggy currently serves as the Director for the NCURA Peer Programs (Peer Advisory Services and Peer Review Program) as well as serving as a Peer Advisor and Peer Reviewer.

Peggy served until her retirement in 2007 as Director of Sponsored Programs and Research Compliance at Oregon State University where she oversaw sponsored programs ($250+ million in awards), non-financial research compliance areas, and served as Conflict of Interest Officer. She returned from retirement to assist by leading the University’s new Office of Research Integrity, until 2011 when she retired again. She currently serves as Director for the NCURA Peer Programs. Her career includes 11 years at Oregon State, 22 years at the University of Illinois—Urbana-Champaign as Assistant Vice Chancellor for Research/Director, with 10 years as a College-level administrator; and seven years in predominantly undergraduate universities: Ball State University and Murray State University in Director and Associate Director positions. At all of her universities she has worked extensively with faculty, Deans, and senior leadership, as well as departmental administrators and administrative offices. She served on numerous university/faculty committees, created/implemented university-wide policies, and engaged in department-central research administrator networking groups. At Ball State and Murray State she additionally focused on faculty development, institutional incentives for research, and integrating research with undergraduate education. While at Murray State University, she created a faculty Research Policy Committee to help promote the role of research at a predominantly undergraduate university; increased emphasis on research led to doubling the sponsored programs award level.

Peggy has given over 300 national, regional and local presentations and workshops. She has served on numerous national NCURA committees and twice served on their Board of Directors. During her career she served as a NCURA national workshop faculty for Fundamentals of Research Administration and Sponsored Projects Administration Level II, Chair of the Nominating and Leadership Committee, a member of the Editorial Review Board for A Guide to Managing Federal Grants for Colleges and Universities, and co-Chair of the NCURA newsletter. Peggy received NCURA’s national Award for Distinguished Service in Research Administration in 2006 and the Award for Outstanding Achievement in Research Administration in 2011. She additionally served several terms on the Board of Directors of the International Society of Research Administrators and received several national awards from that organization. She has been a member of the Council on Governmental Relations.
Appendix C: Charge Letter

Charge and Site Visit Itinerary

April 11, 2016
National Council of University Research Administrators
Peer Review Program
1015 18th Street NW, Suite 901
Washington, DC 20036
peerreview@ncuра.edu

Dear Colleagues:

Texas A&M University – Corpus Christi (TAMU-CC) requests an NCURA Peer Review for the purpose of growing an effective and responsible administrative organization with the capacity to support the current and future demands of our research community. TAMU-CC intends to review periodically the various administrative units within the purview of the Division of Research, Commercialization and Outreach (RCO) as well as other central administrative offices and college and departmental units on our campus. RCO has been under the aegis of the Vice President for Research, Commercialization and Outreach since 2011. During that time the University has grown substantially – increasing both in student population and expanding research capacity. In the recent past, RCO has undertaken a variety of services in support of the efforts of our faculty to garner external research support and to provide support to the campus research community in general. Given the University’s overarching goal of becoming an emerging research institution by 2020, a review of its research functions and operations is imperative. We anticipate such an external review will occur every 5 years.
TAMU-CC is an expanding, doctoral-granting institution committed to preparing graduates for lifelong learning and responsible citizenship in the global community. We are dedicated to excellence in teaching, research, creative activity and service. Our supportive, multicultural learning community provides undergraduate and graduate students with a challenging educational experience through residential, distance learning and international programs. The University's federal designation as a Hispanic Serving Institution (HSI) provides a foundation for closing educational gaps, while its strategic location on the Gulf of Mexico and on the cultural border with Latin America provides a basis for gaining national and international prominence. In May 2014, TAMU-CC released the strategic plan entitled “Momentum 20/20: A clear vision”, which outlines the goal of becoming an emerging research university with unparalleled commitment to every student’s success, closing gaps in achievement and delivering a robust campus experience. The Momentum 20/20 strategic plan has generated challenges for TAMU-CC, including the mismatch between the previous identity of a regional teaching campus and the current culture associated with a rapidly-growing research environment.

We understand that the review will utilize the NCURA National Standards. We kindly request that the review team focus on these areas of particular interest:

- Institutional Commitments
- Sponsored Program Operations: Award Acceptance and Initiation
- Sponsored Program Operations: Award Management
- Institutional Integration of Obligation made with Sponsored Program activities.

Sincerely,

Dr. Luis Cifuentes
Vice President, Division of Research, Commercialization and Outreach

Date: 4/12/2016

Dr. Miguel Moreno
2015-2016 Chair, Council of Principal Investigators and Research Administrators (CPIRA)

Date: 4/11/2016
Appendix D: Site Visit Itinerary

May 9, 2016  
Arrival at Omni Corpus Christi Hotel  
500 North Shoreline Blvd  
Corpus Christi, TX 78401  
(361) 877-1690  
Dr. Miguel Moreno (361-673-4887) will pick up the review team members and transport them to the hotel.

NCURA Team - Executive Session

**ITINERARY:** All meetings will be held in *Faculty Center Room 177*

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
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<tbody>
<tr>
<td>7:15 am</td>
<td>Bell Stand: Dr. Elizabeth Sefcik, Professor, College of Nursing and Health Sciences</td>
</tr>
</tbody>
</table>
| 8:00 – 8:45| Entrance Meeting:  
Dr. Luis Cifuentes, Vice President for Research, Commercialization and Outreach  
Dr. Miguel Moreno, Chair, Council of Principal Investigators and Research Administrators |
| 8:45 – 9:30| Dr. Flavius Killebrew, President  
Dr. Kelly Quintanilla, Provost and Vice Present for Academic Affairs |
| 9:30 – 9:45| Executive Session |
| 9:45 – 10:45| Council of Principal Investigators and Research Administrators |

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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<tbody>
<tr>
<td>Dr. Miguel Moreno - Chair</td>
<td>Associate Professor, Department of Psychology and Sociology</td>
</tr>
</tbody>
</table>
| Dr. Dorina Murgalet - Vice Chair | Director, Center for Water Supply Studies and  
Assistant Professor of Geology, Department of Physical and Environmental Science |
| Ms. Gina Concannon - Council Coordinator | Assistant Director for Administration, Conrad Blucher Institute for Surveying and Science |
| *Dr. Faye Bruun*        | Associate Professor, Department of Educational Leadership, Curriculum and Instruction |
| *Ms. Lisa Garza*        | Business Manager, College of Science and Engineering                      |
| Dr. Dalal Kar           | Associate Professor, Department of Computing Sciences                     |
| Dr. Jim Lee             | Director of Research, South Texas Business Development Center and Regents Professor, Department of Decision Sciences and Economics |
| Dr. Pamela Meyer        | Regents Professor, Department of Psychology and                           |
Sociology

*Dr. Paul Montagnier
Endowed Chair, Ecosystem Studies and Modeling, Harte Research Institute for Gulf of Mexico Studies and Regents Professor, Department of Physical and Environmental Sciences
Director of Workforce Development, Community Outreach

Ms. Carole Moody

Dr. Riccardo Mazzochiodi
Associate Professor, Department of Life Sciences

Mr. Brian Nicolau
Assistant Director and Research Associate, Center for Coastal Studies

Dr. Phyllis Robertson
Assistant Professor, Department of Teacher Education

*Dr. Alecsey Sadovski
Professor, Department of Mathematics and Statistics

Dr. Elizabeth Setfick
Professor, College of Nursing and Health Sciences
Executive Director, Programs for Academic Student Support

Ms. Patricia Spaniol-Mathews

*Dr. Michael Starek - Ex Officio Rep Faculty Senate
Assistant Professor, Departing of Computing Sciences: Geospatial Engineering and GIS

*Ms. Gail Sutton
Chief Operating Officer, Harte Research Institute for Gulf of Mexico Studies

*Dr. Magen Thiyagarajan
Director, Plasma Engineering Research Lab and Associate Professor, Engineering and Engineering Technology

Dr. Philippe Tissot
Associate Director and Associate Research Professor, Conrad Blucher Institute for Surveying and Science

*Dr. Michael Wetl
Associate Professor, Department of Life Sciences

*Unable to attend

10:45 – 11:45  Pre-Award Administration
Dr. Mayra Hough, Director, Office of Sponsored Research Administration

11:45 – 12:45  NCURA Team Executive Session – Working Lunch

12:45 – 1:45  Staff, Sponsored Programs, Pre-Award
Ms. Sue Hibbs, Assistant Director, TAMU Sponsored Research Services
Mr. Greg Ganske, Proposal Administrator, TAMU Sponsored Research Services

1:45 – 2:00  Executive Session

2:00 – 2:45  Deans
Dr. Lea Der (LD) Chen, Director, School of Engineering and Computing Sciences for Frank Pezold, Dean, College of Science and Engineering
Dr. Mark Hartlueb, Interim Dean, College of Liberal Arts
Dr. Arthur Hernandez, Dean, College of Education
Dr. Mary Jane Hamilton, Dean, College of Nursing and Health Sciences
Dr. John Gamble, Dean, College of Business

2:45  3:30  Directors
Dr. David Yossowitz, Harte Research Institute Endowed Chair and Professor of
Socio-Economics, College of Business for Dr. Larry McKinney, Executive Director, Harte Research Institute for Gulf of Mexico Studies
Dr. Gary Jeffers, Director, Conrad Blucher Institute for Surveying and Science
Dr. Paul Zimba, Director, Center for Coastal Studies
Dr. Donna Murgulet, Director, Center for Water Supply Studies
Dr. Jim Lee, Director of Research, South Texas Economic Development Center
Dr. Melanie Neely-Williams, Assistant Director, Lone Star Unmanned Aerial System Center of Excellence and Innovation

3:50 – 3:45 Executive Session

3:45 – 5:00 Faculty/Research Group
Dr. Deniz Gevrek, Assistant Professor of Economics, College of Business
Dr. Jim Gibian, Harte Research Institute Endowed Chair and Endowed Associate Research Professor, Department of Physical and Environmental Sciences
Dr. Randall Harris, Associate Professor of Management, College of Business
Dr. Anne-Marie Lelkes, Assistant Professor of Accounting, College of Business
Mr. Larry Lloyd, Research Specialist II, Conrad Blucher Institute for Surveying and Science
Dr. Richard McLaughlin, Harte Research Institute Endowed Chair and Professor of Marine and Coastal Policy & Law, Department of Physical and Environmental Sciences
Mr. James Rizzo, Assistant Director for Operations, Conrad Blucher Institute for Surveying and Science
Dr. John Scarpa, Associate Professor of Aquaculture, Department of Life Sciences
Dr. Richard Smith, Assistant Professor of Geospatial Engineering, Department of Computing Sciences
Dr. Philippe Tissot, Associate Director and Associate Research Professor, Conrad Blucher Institute for Surveying and Science
Dr. Michael Wetzel, Associate Professor of Marine Biology, Department of Life Sciences

Transportation pickup details:
5:15 pm Drop-Off Zone on Seagull Lane: Dr. Philippe Tissot, Associate Director, Conrad Blucher Institute for Surveying and Science

Wednesday – May 11, 2016

Transportation pickup details:
7:15 am Bell Stand: Dr. Elizabeth Seefjik, Professor, College of Nursing and Health Sciences
8:00 – 9:15 Research Compliance and Environmental Health and Safety
Mr. Roy Coons, Director, Environmental Health and Safety
Dr. Randall Bowden, Chair, Institutional Review Board
Dr. Jean Sparks, Chair, Institutional Animal Care and Use Committee
Dr. Gregory Buck, Institutional Biosafety Committee

9:15 – 9:30 Executive Session

9:30 – 10:00 Contract Negotiation
Mr. Warren DeLuca, Attorney, TAMU Office of General Counsel

10:00 - 10:15  Executive Session

10:15 - 11:45  Post-Award Administration
Ms. Maggie Salinas, Senior Grants and Contracts Officer, Sponsored Programs Administration
Ms. Jenny Quick, Grants and Contracts Specialist, Sponsored Programs Administration
Ms. Kimberly Hawkinson, Grants and Contracts Specialist, Sponsored Programs Administration
Mr. Tuan Phung, Business Coordinator, Division of Research, Commercialization and Outreach

11:45 - 12:45  NCURA Team Executive Session – Working Lunch

12:45  1:15  Mr. Terry Tatum, Executive Vice President, Finance and Administration

1:15 - 2:45  Unit/Departmental Research Administrators
Ms. Heather Barr, Grants Coordinator, College of Science and Engineering
Ms. Gina Concannon, Assistant Director for Administration, Conrad Blucher Institute for Surveying and Science
Ms. Karen Costanzo, Project Coordinator, College of Liberal Arts
Ms. Mariah Dar, Business Coordinator, College of Business
Ms. Lisa Garza, Business Manager, College of Science and Engineering
Ms. Carina Gonzales, Business Coordinator, First in the World Program
Ms. Christina Gonzalez, Business Manager, Harte Research Institute for Gulf of Mexico Studies
Ms. DeAnna Greer, Business Manager, Conrad Blucher Institute for Surveying and Science
Mr. Luis Hernandez, Grants Coordinator, College of Science and Engineering
Ms. Zava Kuklinski, Business Coordinator, College of Liberal Arts
Ms. Kaliee Olivarez, Business Coordinator, College of Liberal Arts
Ms. Cynthia Peralta, Business Coordinator, Center for Academic Student Achievement
Ms. Gail Sutton, Chief Operations Officer, Harte Research Institute for Gulf of Mexico Studies
Ms. Theresa Walker, Business Support Specialist I, Center for Coastal Studies

2:45  3:09  Executive Session

3:00 - 3:30  Accounting
Ms. Rebecca Torres, Associate Vice President, Finance and Administration and Comptroller
Ms. Yolanda Castorena, Assistant Comptroller and Director of Accounting

3:30 - 4:15  Compliance Oversight Staff
Ms. Caroline Lutz, JD, Research Compliance and Export Control Officer
Dr. Edward Orona, Research Compliance Coordinator
4:15 - 4:30 Executive Session

4:30 - 5:00 Internal Audit
Ms. Amanda Detson, CPA, Director, TAMU System Internal Audit Department
Ms. Robin Woods, CPA, Director, TAMU System Internal Audit Department

Transportation pick-up details:
5:15 pm Drop-Off Zone on Seagull Lane: Mr. James Rizzo, Assistant Director for Operations, Conrad Blucher Institute for Surveying and Science

Thursday – May 12, 2016
Transportation pick-up details:
7:15 am Bell Stand: Dr. Elizabeth Seefeld, Professor, College of Nursing and Health Sciences

8:00 – 8:30 Open

8:30 – 9:15 Ms. Jaime Nodarse, Assistant Vice President for Development, Institutional Advancement

9:15 – 9:30 Executive Session

9:30 – 10:30 Research Administration Information Technology
Ms. Sharmin Ahmed, Research and Commercialization Analyst, Research, Commercialization and Outreach
Mr. Ed Evans, Associate Vice President for Information Technology and Chief Information Officer

10:30 – 10:45 Executive Session

10:45 – 11:45 Faculty/Researcher Group
Dr. Sara Baldwin, Associate Professor of Population Health, College of Nursing and Health Sciences
Dr. Eva Bell, Assistant Professor of Family and Psychiatric Nursing, College of Nursing and Health Sciences
Ms. Heather deGrande, Clinical Assistant Professor of Medical/Surgical Nursing, College of Nursing and Health Sciences
Dr. Theresa Garcia, Assistant Professor of Research and Health Law & Ethics, College of Nursing and Health Sciences
Ms. Erin Hill, Research Specialist III, Center for Coastal Studies
Dr. Yolanda Keys, Associate Professor of Healthcare Administration and Nursing Leadership, College of Nursing and Health Sciences
Dr. Karen McCabe, Associate Dean of Undergraduate Programs, College of Education and Professor of Special Education, Department of Teacher Education
Dr. Michael Sarell, Assistant Professor of Geospatial Engineering, Department of Computing Sciences
Dr. Benjamin Walther, Assistant Professor of Coastal Fish Ecology, Department of Life Sciences
Ms. Deidre Williams, Coastal Research Scientist, Conrad Blucher Institute for
Surveying and Science  
**Dr. Meng Zhao**, Assistant Professor of Nursing Research, College of Nursing and Health Sciences  
**Dr. Paul Zimba**, Director, Center for Coastal Studies and Associate Professor of Aquatic Plant Ecology, Department of Life Sciences

11:45 – 12:45  
*NCURA Team Executive Session – Working Lunch*

12:45 – 1:45  
Proposal Development  
**Dr. Ahmed Mahdy**, Associate Vice President, Research, Commercialization and Outreach  
**Mr. Dan Riechers**, Senior Research Development Officer  
**Ms. Cynthia Lyle**, Senior Research Development Officer

1:45  – 2:00  
Executive Session

2:00 – 3:00  
Open, Call-back time

3:00 – 3:30  
Executive Session: Final Exit Meeting Report-Out Preparation

3:30 – 5:00  
Exit Meeting  
**Dr. Luis Cifuentes**, Vice President for Research, Commercialization and Outreach  
**Dr. Miguel Moreno**, Chair, Council of Principal Investigators and Research Administrators

Transportation pick-up details:  
5:15 pm  
Drop-Off Zone on Seagull Lane: **Ms. Gina Concannon**, Assistant Director for Administration, Conrad Blucher Institute for Surveying and Science
Appendix E: NCURA Resources

One cannot underestimate the power of engaging with other research administrators to create new and innovative solutions to the challenges they face at their institutions. NCURA gives its members the opportunity to harness that power. NCURA membership is an essential resource at every point in your research administration career.

ARE YOU TAKING FULL ADVANTAGE OF YOUR NCURA MEMBERSHIP?

Your membership benefits include:

✓ Access to our professional networking site Collaborate. Collaborate is the home to our listservs, communities, discussions, and resource libraries. This is a great place to connect with other research administrators, discuss hot topics, share best practices, and stay ahead of the curve in the administration for research.

✓ Automatic membership into one of our eight regions connects you with other research administrators in your area.

✓ Volunteering gives you the opportunity to establish a strong network of peers, to acquire new skills and experiences, to help guide the future of NCURA, and to help advance the field of research administration.

✓ NCURA Magazine’s e-Xtra is a compilation of the very latest news and must-read information sent directly to your inbox each Monday.

✓ NCURA members who enroll in the JHU online Master of Science in Research Administration Program will receive a 10% discount.

✓ Exclusive member pricing for all NCURA meetings, conferences, education, and bookstore purchases.

✓ Free postings to NCURA’s Career Center (a savings of $300 per posting) as well as access to all current job listings.

✓ Access to NCURA’s Member Directory.

✓ Access to community discussions, resource libraries, blog postings, and Volunteer Central on Collaborate.

✓ Access to both current and past issues of the NCURA Magazine, published six times a year.

✓ Members-only access to educational videos from meetings and conferences including full-session videos.
YouTube TUESDAY
NCURA produces 2-3 minute videos on diverse research administration topics and posts them on our YouTube channel each Tuesday. Institutions are welcome to use these videos in their on-campus training programs. With over 1,100 subscribers and over 350,000 views on the channel since its July 2011 inception, this is a resource we encourage you to check out! Find us at http://www.youtube.com/user/ncura1959

NCURA GLOBAL
NCURA Global seeks to be the foremost provider of professional development, knowledge, and leadership in the global research administration and research management community. We serve all NCURA members in the International Region and all U.S. members who are involved in global research administration. In addition, NCURA Global advances the overall NCURA mission by promoting research administration as a profession on a worldwide basis. We do this by providing a global network of support and collaboration for our members, offering professional development through top-notch research administrators and managers, and partnering with sister organizations to build the requisite infrastructure for the global research enterprise.

GROW YOUR NETWORK
Find the colleague that you need by searching in our online Member Directory by area of expertise and responsibility. Make sure that you have updated your profile so that your colleagues can find you too!

“Collaborate is my “GO TO” tool… when I have a question and I need an answer fast, I can count on my Collaborate peers to give me the answers quickly and offer additional feedback as well.”

Erica Gambrell, Coordinator of Research Services, The University of Alabama

WHO ARE RESEARCH ADMINISTRATORS AND WHAT IS NCURA?
The research administrator works with dedicated and brilliant researchers and scholars who often are on the cutting edge of their field and with the government and private sponsors that require stewardship for the funding they provide. NCURA is the professional home to 7,000+ research administrators, and we foster innovative and collaborative education and networking as we support research together.
NCURA HOSTS 3 NATIONAL MEETINGS A YEAR

Annual Meeting of the Membership

The annual meeting of the membership is held in August each year in Washington, DC. Over 2,000 of our 7,000+ members attend.

We begin with a full day of workshops and senior level seminars which are a supplemental training program open to all registrants of the annual meeting. This in-depth, targeted training and professional development includes offerings from those new to the profession to our most senior level members.

We then embark on two and a half days of presentations, discussions, open forums and networking opportunities spanning all areas of research administration including, but not limited to, Pre-Award, Post-Award, Compliance, Departmental, Intellectual Property, Contracts, International, Predominantly Undergraduate Institutions, Electronic Research Administration, and Medical Center/Hospital Issues. Attending the annual meeting gives our members the opportunity to participate in sessions over a full range of topics to support their need for information in a variety of areas.

This annual reunion of the membership also includes our Sunday dinner, Tuesday evening event, dinner groups, regional networking events and numerous volunteer activities that create the opportunities for you to meet and connect with your colleagues and create your peer network.

In addition to the education and networking opportunities the annual meeting of the membership provides, our sponsor and exhibitor partners will be available to share information on the products and services to support you and your institution.
Financial Research Administration (FRA)
The community of those engaged in the financial administration for research was brought together in 2000 for a special topic conference on post-award issues. This community has come together each year since for their own conference which has grown from 300 participants in the year 2000 to over 1,000 in 2016.

This conference travels to a new location each year and is held between February and late March. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.

Pre-Award Research Administration (PRA)
In 2006, the NCURA Board of Directors unanimously agreed to offer a Pre-Award Research Administration (PRA) Conference.

The vision for this conference is to create an annual PRA Conference complementing the existing FRA (Financial Research Administration) annual conference.

This conference of over 600 participants travels to a new location each year and is held back-to-back with the FRA conference noted above. NCURA members enjoy a discounted registration fee, and the conference is open to all members of the research administration community.

NCURA MEETING DATES

**Annual Meeting**
58th Annual Meeting:
August 7 – 10, 2016 ~ Washington, DC

59th Annual Meeting:
August 6 – 9, 2017 ~ Washington, DC

60th Annual Meeting:
August 5 – 8, 2018 ~ Washington, DC

**PRA**
March 8 – 10, 2017 ~ San Diego, CA

**FRA**
March 11 – 13, 2017 ~ San Diego, CA
TRAVELING WORKSHOPS

NCURA offers 6 different workshops that are 2 or 2½ days and travel around the country throughout the year. And, with a commitment of 60 participants, NCURA can bring one of these 6 workshops to your campus!

LEVEL I: Fundamentals of Sponsored Project Administration

Individuals involved in sponsored projects administration are faced with a multitude of challenges: becoming knowledgeable about federal regulations and individual agency requirements, providing assistance to faculty, gathering information, administration of awards, and many other tasks. The purpose of this program is to provide participants (this program is intended primarily for the newcomer – less than 2 years experience) with a broad overview of the various aspects of sponsored projects administration, including preparation and review of proposals, negotiation and acceptance of awards, financial and administrative management, closeout and audit, as well as the relevant compliance issues.

LEVEL II: Sponsored Project Administration: Critical Issues in Research Administration (SPA II)

For more experienced research administrators, NCURA created Sponsored Project Administration: Level Two, Critical Issues in Research Administration (commonly referred to as “SPA II”). This program offers participants an opportunity for in-depth interaction in four core aspects of research administration: institutional compliance responsibilities, proposal creation and submission, contract subaward review, and post award financial administration. Each of these topics will be explored through a combination of case study analysis and discussion.

Financial Research Administration Workshop (FRA)

The Financial Research Administration Workshop focuses primarily on the financial aspects of research administration. This workshop provides an in-depth look at financial compliance issues through a combination of lecture, case studies, review of Federal audit reports, and a discussion of best practices. The workshop presents the financial issues of sponsored programs management using a cradle-to-grave award lifecycle approach, and discusses the impact of the financial issues at each stage of award management.
“I greatly enjoyed the dynamic employed by the presenters, who were all clearly collegial and comfortable with each other’s differing styles. The depth and breadth of their knowledge and passion for the subject matter was clear, yet they were still accessible and entertaining.”

Michael Gouin-Harr
Grant Developer, Spectrum Health Hospitals

Departmental Research Administration Workshop (DRA)

Administrators who work at the department and college level have unique challenges. Like central offices, we must have the knowledge of pre- and post-award functions. What distinguishes the departmental research administrator from other research support functions is being intimately involved with all facets of the administration process, daily interaction with faculty, as well as other departmental-specific responsibilities.

This program examines the foundations of research administration in the context of departmental administration - the transactional level. The program will concentrate on applying best practices to a department administrator's day-to-day activities.

NEW NCURA Workshops: Global Edition

NCURA currently offers the following workshops globally:

- Level I: Fundamentals of Sponsored Project Administration
- Level II: Sponsored Project Administration, Critical Issues in Research Administration (SPA II)
- Financial Research Administration

For information on how you can bring this workshop to your country, please send your request to NCURAglobal@tamu.edu

Export Controls Workshop

This NCURA workshop will introduce the primary U.S. export control regulations and explain how they apply to an academic environment. With this understanding, helpful tools and exercises will be introduced which will allow participants how to identify export control risk at their institutions and then how to establish an effective program to manage this risk.

Research Administration: The Practical Side of Leadership Workshop

For many involved in sponsored programs administration, moving into a management position is a goal. While a wealth of information is available on leadership, this workshop is focused on the practical aspects of leadership in the research administration profession. The workshop will be valuable for managing your career path to reach your goal, for enhancing your existing leadership skills, or for building strengths as a senior research administrator.

This workshop will broadly concentrate on the following areas as they relate to research administration:

- leadership and management
- education and communication
- goal and priority setting

UPCOMING WORKSHOP DATES

May 16-18, 2016 ~ Washington, DC
Host Hotel: Georgetown University Hotel and Conference Center
- Level I: Fundamentals of Sponsored Project Administration Workshop

June 27-29, 2016 ~ Chicago, IL
Host Hotel: The Drake Hotel
- Level I: Fundamentals of Sponsored Project Administration Workshop
- Departmental Research Administration Workshop
- Financial Research Administration Workshop
- Export Controls Workshop
NCURA 8 Week Online Tutorials - Learn at Your Own Pace!

These primers are intended for those new to each area or who have had very limited exposure.

**Primer on Clinical Trials**
The course will focus on key administrative, financial, and regulatory issues that arise in planning, funding, conducting, and closing out clinical trials.

**Primer on Federal Contracting**
Since Federal contracts are very different from federal grants, we have developed a thorough overview of this complex process.

**Primer on Subawards**
This online tutorial is focused on subcontracting programmatic effort under federal grants and other financial assistance awards. “Subcontracting” and “third party agreements” cover a wide variety of activities. The course has been divided into a series of lessons that deal with aspects of the subaward crucial to the Research Administrator.

**Primer on Intellectual Property in Research Agreements**
This online introductory course is designed for university personnel working in contracts and grants, sponsored research and technology transfer offices. Its goal is to provide a basic background in issues of intellectual property management and practice in analyzing and drafting research and licensing agreements.
Webinars
Check out NCURA’s outstanding Video Webinars!
✓ The Right Metrics: Choosing, Measuring and Evaluating Metrics to Drive Performance Success in Your Office
✓ Is it a Gift or a Grant and other Critical Funding Mechanisms Your Staff Should Know
✓ Save Your Institution Millions: Mitigating Institutional Risk of Research Misconduct
✓ Going Global: What Your Institution Needs to Know about Managing Research Without Borders
✓ Crowdfunding: An Enormous Opportunity at Your Fingertips
✓ Creating the Cohesive Team Your Office Needs to Thrive

Check out these and more at onlinelearning.ncara.edu

Here’s what people are saying about our webinars:
“The presenters were excellent!”
“Thank you, I learned some important concepts that I had not even considered!”
“I really love the NCURA webinars!”

Life Cycle Series
Research Administration in its many varied facets continuously evolves, and most universities and colleges are challenged to keep up with the increasingly complex, ever-changing environment. Perhaps the most compelling of these challenges is how institutions will create and sustain a knowledgeable professional workforce – research administrators who not only understand the new rules and regulations, but can also apply this knowledge in a fast-paced environment.

NCURA has developed a unique approach to meeting this challenge, offering a new video webinar series, with a twist. The Life Cycle of the Award Series is designed to offer institutions options in providing professional growth opportunities for grant managers and research administration personnel.

Format: The series can be viewed as live video webinars, and/or as a recorded training tool for institutions to build customizable training programs for grant managers at all levels.

This new companion Workbook will include multiple examples of forms, policies, case studies, and recommendations for using other NCURA resources available to the membership.

Life Cycle Series
✓ The Toolbox for Research Administrators
✓ Proposal Development – 3 Part Series
✓ Pre-Award / Budgeting – 3 Part Series
✓ Award Negotiation and Acceptance – 3 Part Series
✓ Award Monitoring/Award Management
✓ Compliance

Available at onlinelearning.ncara.edu
Publications
Need to expand your knowledge but have a limited training budget? Visit the NCURA Store for more information on these affordable resources!
✓ A Primer on Clinical Trials for the Research Administrator, Second Edition
✓ Cost Sharing: An Overview, Second Edition
✓ Cost Accounting Standards
✓ Compensation – Personal Services: Managing and Reporting Effort
✓ Facilities and Administrative Costs in Higher Education, Second Edition
✓ Establishing and Managing an Office of Sponsored Programs at Non-Research Intensive Colleges and Universities, Third Edition
✓ A Primer on Intellectual Property, Second Edition
✓ The Role of Research Administration, Third Edition
✓ Writing and Negotiating Subawards Under Federal Prime Awards, Second Edition
✓ Circular A-21 Mini-Guide
✓ Circular A-110 Mini-Guide
✓ Circular A-133 Mini-Guide
✓ OMB Uniform Guidance Desk Reference
✓ Regulation and Compliance: A Compendium of Regulations and Certification Applicable to Sponsored Programs
✓ Sponsored Research Administration: A Guide to Effective Strategies and Recommended Practices

Research Management Review (RMR) – NCURA’s Online Scholarly Journal
As the online scholarly journal for the National Council of University Research Administrators, the RMR is concerned with the broad range of issues affecting the administration of research and the changing research environment at the national and international levels. The RMR provides a forum for the dissemination of knowledge about the study and practice of the research administration profession.
NCURA Magazine

NCURA's magazine is published six times a year with cutting edge pieces on management, perspectives on federal policy written by members and non-members, and the latest information and explanations on topics of interest to research administrators. NCURA Magazine's Monday's eXtra, a supplement to the Magazine, provides timely and important information for NCURA members in an easy to read, brief format sent directly to your inbox each week.

Fellowship Program

The Fellowship program has two underlying objectives: (i) the training of research administrators, and (ii) enhancing U.S. and foreign research collaboration. This program is intended to reduce barriers to international research administration and create an administrative environment conducive to international collaboration.

The program will provide an opportunity for U.S. research administrators to travel to research organizations abroad and immerse themselves in a program of mutual learning and knowledge exchange.

Peer Review Program

Are you looking to enhance your sponsored programs operation or to engage leadership in a discussion about research administration? In a confidential process similar to an academic program review, NCURA matches a team of senior research administrators to your institution. The review uses National Standards that represent the core and vital functions of sponsored programs regardless of size and type of institution. After reviewing background materials you provide, the Reviewers conduct 360 degree interviews with institutional stakeholders during a site visit. At the completion of the review, the institution receives a detailed written report that provides valuable feedback addressing program strengths and areas for improvement. Use the peer review for risk management/compliance, enhanced faculty service, operational efficiencies, business process improvement, and improved communications.

Peer Advisory Services

Research Administration Planning is geared to institutions that would like assistance in conceptualizing the process for developing new or revised policies, procedures, and management structures, in the context of U.S. based best practices. The focus assists the institution in integrating commitments for extramural funding and conceptualizing and strategizing longer term plans for establishing a solid foundation for research administration.

Focused Analysis brings to you senior research administrator expertise to analyze a specific research administration function drawn from the National Standards and to provide an analysis based on U.S. best practices.

Directed Education brings the senior research administrator's expertise to provide targeted education at your institution in an area that is critical to helping you build a solid research administration infrastructure and to manage risk. The directed education is tailored to your specific topic or need.

“NCURA's was the most detailed and thorough external review we have received. It was objective, incisive, and provided recommendations the university will act on to improve our research administration.”

Vice President for Research, Research University

“NCURA is the best organization for developing those relationships that are going to get you through a career in research administration.”

Cindy Hope,
Assistant Vice President for Research & Director, Sponsored Programs,
The University of Alabama

Coming Soon: On-demand downloadable publications
## Appendix F: Additional Resources

### UAF RESEARCH ADMINISTRATION

**GRANTS MANAGEMENT ROLES AND RESPONSIBILITIES MATRIX**

<table>
<thead>
<tr>
<th>ROLES</th>
<th>Institute/College/School</th>
<th>UAF Central</th>
<th>SW</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>PI</td>
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<tr>
<td>Unit Admin</td>
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<tr>
<td>Dept. Head</td>
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<tr>
<td>Dean/Division</td>
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<td>OSP</td>
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<tr>
<td>OGC/A</td>
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<tr>
<td>Procurement</td>
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<td>VOR</td>
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<td>UCAS</td>
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<td>OIIPC</td>
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<tr>
<td>Cost Analysis</td>
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<td>UA Foundation</td>
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<tr>
<td>Internal Audit</td>
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<tr>
<td>Development</td>
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<tr>
<td>Other</td>
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</tr>
</tbody>
</table>

### Policy Responsibilities

#### I. GENERAL RESEARCH ADMINISTRATION ACTIVITIES AND SUPPORT

**Strategic**
- Direct and guide the institution’s research mission
- Nurture technology related relationships and partnerships with industry and government

**Compliance - General**
- Develop and implement a comprehensive research compliance program
- Disseminate compliance information and new regulations to the research community
- Serve as advisor to research administration units on key compliance topics
- Comply with institution policies on misconduct in research
- Comply with federal, state and Institution policies and regulations governing sponsored programs
- Determine appropriate responses to incidents of non-compliance
- Act as liaison with federal regulatory agencies during external compliance reviews
- Serve as expert resources on knowledge of federal and other sponsor regulations

### KEY
- PI = Principal Investigator
- ORI = Office of Research Integrity
- OIPC = Office of Intellectual Property and Commercialization
<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review current practices to identify research</td>
<td>Compliance risks</td>
</tr>
<tr>
<td>Communicate and network with peer institutions</td>
<td></td>
</tr>
<tr>
<td>Monitor federal compliance requirement to develop &amp;</td>
<td>Implement compliance audit workplans</td>
</tr>
<tr>
<td>Coordinate the A-133 audit</td>
<td></td>
</tr>
<tr>
<td>Coordinate pre-award audits</td>
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</tbody>
</table>

| Cost Reimbursement                                  |                                                                                  |
| Prepare and negotiate F&A cost rate proposal       |                                                                                  |
| Prepare and negotiate fringe benefit rate           |                                                                                  |
| Communicate F&A rate to Institution personnel      |                                                                                  |
| Calculate Service Center recharge rates            |                                                                                  |
| Approve Service Center recharge rates              |                                                                                  |
| Review revenue & expenses of each service center for compliance with federal regulations |                                                                                  |
| Conduct audits of service centers for compliance with University Policy |                                                                                  |
| Monitor Services Center billing activities          |                                                                                  |

| Pre-Proposal Support                                 |                                                                                  |
| Identify funding opportunities                       |                                                                                  |
| Maintain database of proposal submissions            |                                                                                  |
| Provide reports to administrators for tracking funding trends |                                                                                  |
| Assist with implementation of sponsor electronic grant processing systems |                                                                                  |

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### UAF RESEARCH ADMINISTRATION

**GRANTS MANAGEMENT ROLES AND RESPONSIBILITIES MATRIX**

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<tr>
<th>Policy</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>II. PROPOSAL DEVELOPMENT AND BUDGETING</strong></td>
<td></td>
</tr>
<tr>
<td><strong>General</strong></td>
<td>Identify and communicate required training courses for PIs</td>
</tr>
<tr>
<td></td>
<td>Provide proposal forms and application materials</td>
</tr>
<tr>
<td></td>
<td>Verify that there is some level of effort included in proposal per regulations</td>
</tr>
<tr>
<td></td>
<td>Ensure that the proposal gets to Pre-award by internal deadline</td>
</tr>
<tr>
<td></td>
<td>Review and agree to proposal or application terms and conditions, as well as agency rules and regulations</td>
</tr>
<tr>
<td></td>
<td>Confirm that the entire proposal meets administrative requirements outlined in the application instructions</td>
</tr>
<tr>
<td></td>
<td>Ensure that the applicant has attended required training courses</td>
</tr>
<tr>
<td></td>
<td>Ensure that the applicant is eligible to be a principal investigator</td>
</tr>
<tr>
<td><strong>Technical Proposal</strong></td>
<td>Prepare technical proposal</td>
</tr>
<tr>
<td></td>
<td>Identify the need for subcontracts</td>
</tr>
<tr>
<td></td>
<td>Identify and request on- or off-campus space needed in addition to that already assigned to the PI</td>
</tr>
<tr>
<td></td>
<td>Request modifications or renovations to on-campus space if necessary</td>
</tr>
<tr>
<td></td>
<td>Request modifications or renovations to off-campus</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>ROLES</th>
<th>UAF Central</th>
<th>Department Head (Chair)</th>
<th>Associate/Full Professor</th>
<th>Assistant Professor</th>
<th>Instructor</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy</strong></td>
<td>Review policy for submission of proposals, review of conflict of interest, and assess the need for an institutional review board review.</td>
<td>Request for review of proposals from the IRB, ROAC, and other review boards.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
</tr>
<tr>
<td><strong>Responsibilities</strong></td>
<td></td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
</tr>
<tr>
<td><strong>Proposal Budget</strong></td>
<td>Prepare the proposal budget and budget justification. Communicate with principal investigators and institutions on preparation of the proposal.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
<td>Review proposal for submission to an institutional review board.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Policy</th>
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</tr>
</thead>
<tbody>
<tr>
<td>If necessary</td>
<td>Determine use of reportable program income</td>
</tr>
<tr>
<td></td>
<td>Verify that program income is recorded correctly</td>
</tr>
<tr>
<td></td>
<td>Make decisions about how to handle situations when total program income offset is greater than total expenditures</td>
</tr>
<tr>
<td></td>
<td>Determine whether program income is reportable or non-reportable</td>
</tr>
<tr>
<td></td>
<td>Report program income to sponsor in financial reports</td>
</tr>
<tr>
<td></td>
<td>Identify sources of actual and potential program income at the proposal stage</td>
</tr>
<tr>
<td></td>
<td>Complete required program income sections in grant proposal, as necessary</td>
</tr>
<tr>
<td></td>
<td>Develop plan for using program income</td>
</tr>
<tr>
<td></td>
<td>Discuss anticipated program income with the department administrator</td>
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<tr>
<td></td>
<td>Address account balance issues at final project termination</td>
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<tr>
<td></td>
<td>Assist PI in calculation prices</td>
</tr>
<tr>
<td></td>
<td>Bill for products or services which produce program income</td>
</tr>
<tr>
<td></td>
<td>Reconcile revenue invoiced or submitted against financial reports</td>
</tr>
<tr>
<td></td>
<td>Monitor levels of Program income in account and any limits that are set by the sponsor</td>
</tr>
<tr>
<td></td>
<td>Properly deposit income received in accordance with the University's revenue policy</td>
</tr>
</tbody>
</table>

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## UAF RESEARCH ADMINISTRATION

### GRANTS MANAGEMENT ROLES AND RESPONSIBILITIES MATRIX

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>III. PROPOSAL REVIEW, APPROVAL AND PROCESSING</strong></td>
<td></td>
</tr>
<tr>
<td>Review and accept proposals with special request (e.g., multiple departments)</td>
<td></td>
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<tr>
<td>Approve request for additional space or modifications or renovations to existing space</td>
<td></td>
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<tr>
<td>Approve technical proposal</td>
<td></td>
</tr>
<tr>
<td>Approve proposal budget and its justification</td>
<td></td>
</tr>
<tr>
<td>Approve department funds to be used for matching funds</td>
<td></td>
</tr>
<tr>
<td>Approve Dean’s funds to be used for matching funds</td>
<td></td>
</tr>
<tr>
<td>Confirm that matching funds and cost sharing are documented and approved</td>
<td></td>
</tr>
<tr>
<td>Oversee (with respect to assurance) that budget items are in accordance with A-21 and the cost accounting standards</td>
<td></td>
</tr>
<tr>
<td>Review proposals to ensure that they are consistent with the institution mission/policies</td>
<td></td>
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<tr>
<td>Review proposals to ensure that they commit an appropriate level of institution resources</td>
<td></td>
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<tr>
<td>Ensure that proposals comply with the policies and procedures of the sponsor</td>
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<tr>
<td>Approve proposals prior to submission to Pre-award</td>
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<tr>
<td>Evaluate requests for F&amp;A rate reductions or waivers</td>
<td></td>
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<tr>
<td>Approve F&amp;A rate and waiver (if necessary)</td>
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<tr>
<td>Check the final application for completeness</td>
<td></td>
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</tbody>
</table>

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<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Sign as the Institutional Official on behalf of the institution</td>
<td>- Ensure institutional oversight</td>
</tr>
<tr>
<td>- Mail-submit the proposal to sponsor</td>
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</tbody>
</table>

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# UAF RESEARCH ADMINISTRATION

## GRANTS MANAGEMENT ROLES AND RESPONSIBILITIES MATRIX

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
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</thead>
<tbody>
<tr>
<td><strong>IV. AWARD ACCEPTANCE AND ESTABLISH ACCOUNT</strong></td>
<td></td>
</tr>
<tr>
<td>PreAward</td>
<td></td>
</tr>
<tr>
<td>Request pre-award accounts, if necessary</td>
<td></td>
</tr>
<tr>
<td>Approve commitment of department funds if project not funded</td>
<td></td>
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<tr>
<td>Approve and establish pre-award account</td>
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<tr>
<td>Set up a pre-award account</td>
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<tr>
<td>Negotiation</td>
<td></td>
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<tr>
<td>Negotiate and approve the project scope</td>
<td></td>
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<tr>
<td>Request subcontract</td>
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<tr>
<td>Develop and negotiate subcontracts in response to PI request</td>
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<tr>
<td>Negotiate, approve, and notify the PI of the project terms and conditions</td>
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<tr>
<td>Notify the appropriate regulatory office if changes to project scope will affect approved protocols</td>
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<tr>
<td>Acceptance and Setup</td>
<td></td>
</tr>
<tr>
<td>Receive the Notice of Grant Award</td>
<td></td>
</tr>
<tr>
<td>Evaluate whether award is a gift or grant</td>
<td></td>
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<tr>
<td>Review the Notice of Grant Award</td>
<td></td>
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<tr>
<td>Accept the agreement on behalf of the Institution</td>
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</tbody>
</table>

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<tr>
<th>Policy</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Notify the PI that the award has been received and send copy of the Notice of Grant Award to the PI and Business Administrator and College Administrator as appropriate.</td>
</tr>
<tr>
<td></td>
<td>Establish the project account and cost sharing account if necessary in the financial system and notify the PI and Business Office.</td>
</tr>
<tr>
<td></td>
<td>Key in the budget into the system.</td>
</tr>
<tr>
<td></td>
<td>Track award date.</td>
</tr>
</tbody>
</table>

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# UAF Research Administration

## Grants Management Roles and Responsibilities Matrix

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>V. FINANCIAL MANAGEMENT OF AWARDS</strong></td>
<td></td>
</tr>
<tr>
<td>Budget and Cash Management</td>
<td></td>
</tr>
<tr>
<td>Establish policy and procedures that ensure the accuracy and timeliness of all financial transactions posting to the general ledger</td>
<td></td>
</tr>
<tr>
<td>Initiate request for rebudgeting and prepare documentation</td>
<td></td>
</tr>
<tr>
<td>Review rebudgeting request and either approve them or return them for issue resolution</td>
<td></td>
</tr>
<tr>
<td>Receive subcontractor invoice</td>
<td></td>
</tr>
<tr>
<td>Approve that work was done by subcontractor</td>
<td></td>
</tr>
<tr>
<td>Approve payment of subcontractor invoices</td>
<td></td>
</tr>
<tr>
<td>Process payment of subcontractor invoices (Procurement)</td>
<td></td>
</tr>
</tbody>
</table>

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<th>UAF Central</th>
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<tbody>
<tr>
<td>PI</td>
<td>Unit Admin.</td>
<td>Dept. Head</td>
<td>OBP</td>
<td>OGP</td>
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<td></td>
<td>Dean/Director</td>
<td></td>
<td>OSP</td>
<td>CAS</td>
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<td></td>
<td>Procurement</td>
<td></td>
<td>VPR</td>
<td>ORI</td>
</tr>
<tr>
<td></td>
<td>CAS</td>
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<td>OIPC</td>
<td>Foundation</td>
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<td>Grant Analysis</td>
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<td>INVA</td>
<td>Internal Audit</td>
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<td>Cost Analysis</td>
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<td>Development</td>
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<td></td>
<td>Other</td>
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<td>Other</td>
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<tr>
<td>Policy</td>
<td>Responsibilities</td>
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<td>-----------------------------------------------------------------------</td>
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<tr>
<td>Ensure that A-133 reports are received from sub recipients</td>
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<tr>
<td>Approve or recommend approval of carry forward of unexpended funds of specific awards</td>
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</tr>
<tr>
<td>Initiate the process of documenting cost sharing and/or matching</td>
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<tr>
<td>Report cost sharing on sponsored awards</td>
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<td></td>
</tr>
<tr>
<td>Provide institutional oversight related to documenting cost sharing and/or matching</td>
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<tr>
<td>Approve cost transfer requests for compliance with Institution policy</td>
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<td></td>
</tr>
<tr>
<td>Provide institutional oversight on cost transfer</td>
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<tr>
<td>Provide guidance in interpretation of federal requirements with respect to cost transfers</td>
<td></td>
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</tr>
<tr>
<td>Monitor cost transfer activity and review transaction documentation for compliance</td>
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<tr>
<td>Provide training on procedures and certify individuals to prepare and approve cost transfer transactions</td>
<td></td>
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<tr>
<td>Require cost transfer to be reversed if they are unjustified, or are inadequately justified or documented, if appropriate</td>
<td></td>
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</tr>
<tr>
<td>Terminate access to cost transfer transaction processing for individuals with repeated unacceptable, inadequately documented or justified cost transfers, if appropriate</td>
<td></td>
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</tr>
<tr>
<td>Resolve questions regarding cost transfers</td>
<td></td>
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</tr>
<tr>
<td>Communicate with the dept / PI admin office to enable charges to be made correctly to the appropriate awards</td>
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</tbody>
</table>

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<tr>
<th>Policy</th>
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</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Review reports of sponsored program expenses regularly to identify errors in a timely manner and communicate required changes to the dept./PI admin. office promptly.</td>
</tr>
<tr>
<td></td>
<td>Request transfers of costs to sponsored projects which represent allocation of expenses or corrections of errors.</td>
</tr>
<tr>
<td></td>
<td>Provide written authorization for required cost transfers.</td>
</tr>
<tr>
<td></td>
<td>Maintain queries to be used by dept./PI admin. to monitor award activity.</td>
</tr>
<tr>
<td></td>
<td>Provide PI with timely monthly financial reports.</td>
</tr>
<tr>
<td></td>
<td>Assist PI in financial report reviews.</td>
</tr>
<tr>
<td></td>
<td>Ensure costs transfers requested by PI are performed promptly.</td>
</tr>
<tr>
<td></td>
<td>Advise PI about University policies and procedures, sponsor policies and procedures and regulations regarding the process of cost transfers.</td>
</tr>
<tr>
<td></td>
<td>Ensure that the preparer and the approver for cost transfers is not the same individual.</td>
</tr>
<tr>
<td></td>
<td>Ensure complete justification of cost transfers.</td>
</tr>
<tr>
<td></td>
<td>Ensure retention of complete documentation of cost transfers.</td>
</tr>
<tr>
<td></td>
<td>Review proposed resolution of overdrafts and either approve them or return them for issue resolution.</td>
</tr>
<tr>
<td></td>
<td>Maintain local oversight for the project budget.</td>
</tr>
<tr>
<td></td>
<td>Review monthly financial reports to ensure compliance with A-21 requirements (allowable, allocable, reasonable).</td>
</tr>
<tr>
<td></td>
<td>Prepare and submit invoices to sponsors.</td>
</tr>
<tr>
<td></td>
<td>Prepare and process letters of credit draws.</td>
</tr>
<tr>
<td></td>
<td>Prepare and submit billings for clinical trials.</td>
</tr>
</tbody>
</table>

**KEY**

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- **OIPC** = Office of Intellectual Property and Commercialization
## ROLES

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Reconcile bank accounts where deposits are made and draws are received.</td>
</tr>
<tr>
<td></td>
<td>Receive payments from sponsors and deposit them in institution accounts.</td>
</tr>
<tr>
<td></td>
<td>Resolve payment problems with late or non-payment by funding agencies.</td>
</tr>
</tbody>
</table>

### Financial & Management Reporting

- Provide timely and accurate financial information/reports using the general ledger. |
- Use monthly reports for financial monitoring and identify and resolve errors on the account in a timely manner. |
- Provide interim financial reports to the sponsor and notify the principal investigator. |
- Prepare financial report for submission to sponsor. |
- Certify the financial report before submission to sponsor. |
- Identify the use and reportability of program income. |
- Monitor receipt of program income. |
- Provide institutional oversight to record and report program income. |
- Deposit program income. |
- Prepare and send the report of program income to the sponsor. |
- Ensure compliance with the award budget. |
- Finalize charges with internal service providers and provide new charging instructions for ongoing expenses. |
- Prepare requests for no-cost-extension or carry forward request to sponsor and submit them thru Pre-award with a copy to Post-award. |
- Assist in revolving collection issues. |

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<table>
<thead>
<tr>
<th>Policy</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Clear all custom commitments and all outstanding procurement commitments prior to filing of final financial report</td>
<td></td>
</tr>
<tr>
<td>Retain financial records according to the Records Retention Policy</td>
<td></td>
</tr>
<tr>
<td>Notify dept/PI admin. office when award end date is within 60 days</td>
<td></td>
</tr>
<tr>
<td>Review awards for unallowable costs, overdraws, and remaining balances</td>
<td></td>
</tr>
<tr>
<td>Review facilities and administrative charges</td>
<td></td>
</tr>
<tr>
<td>Close the project sponsored account once all financial obligations have been satisfied</td>
<td></td>
</tr>
<tr>
<td>Remove accounts receivable balances from the general ledger after verification that all cash has been collected or drawn</td>
<td></td>
</tr>
</tbody>
</table>

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# UAF Research Administration

## Grants Management Roles and Responsibilities Matrix

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>VI. NON-FINANCIAL MANAGEMENT OF AWARDS</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Scientific/Program Management</strong></td>
<td></td>
</tr>
<tr>
<td>Conduct the sponsored project</td>
<td></td>
</tr>
<tr>
<td>Complete and submit interim technical reports</td>
<td></td>
</tr>
<tr>
<td>Initiate material transfer agreements</td>
<td></td>
</tr>
<tr>
<td>Review and approve incoming materials transfer agreement</td>
<td></td>
</tr>
<tr>
<td>Complete the progress report for non-competitive renewals</td>
<td></td>
</tr>
<tr>
<td>Provide oversight for all research activity</td>
<td></td>
</tr>
<tr>
<td>Provide local oversight over appointment of individuals to the project</td>
<td></td>
</tr>
<tr>
<td>Initiate programmatic changes to the project</td>
<td></td>
</tr>
<tr>
<td>Review programmatic changes to the project</td>
<td></td>
</tr>
<tr>
<td>Provide institutional endorsement to the sponsor for requests for administrative or programmatic changes initiated by the principal investigator</td>
<td></td>
</tr>
<tr>
<td><strong>Effort Reporting</strong></td>
<td></td>
</tr>
<tr>
<td>Distribute effort reports</td>
<td></td>
</tr>
<tr>
<td>Complete effort report</td>
<td></td>
</tr>
<tr>
<td>Track current and pending effort commitments</td>
<td></td>
</tr>
<tr>
<td>Provide information to facilitate compliance with effort reporting policy</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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<th>Responsibilities</th>
</tr>
</thead>
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<tr>
<td><strong>KEY</strong></td>
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<tr>
<td>OIPC = Office of Intellectual Property and Commercialization</td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Responsibilities</td>
</tr>
<tr>
<td>--------</td>
<td>------------------</td>
</tr>
<tr>
<td>Provide local oversight for effort certification</td>
<td></td>
</tr>
<tr>
<td>Collect and maintain official records of effort reporting</td>
<td></td>
</tr>
<tr>
<td>Develop and implement activity reporting policies and procedures</td>
<td></td>
</tr>
<tr>
<td>Provide guidance in interpretation of federal requirements</td>
<td></td>
</tr>
<tr>
<td>Generate activity reports of dept./PI administrators to distribute</td>
<td></td>
</tr>
<tr>
<td>Monitor compliance with reporting requirements</td>
<td></td>
</tr>
<tr>
<td>Provide training on activity reporting policies and procedures</td>
<td></td>
</tr>
<tr>
<td>Review proposed activity and submit requests for sponsor approval or revisions to effort commitments</td>
<td></td>
</tr>
<tr>
<td>Oversee the activity planning, confirmation process, and overall compliance with this policy in his/her department</td>
<td></td>
</tr>
<tr>
<td>Oversee distribution of activity reports to faculty and PI; provides information on personnel charged to grants</td>
<td></td>
</tr>
<tr>
<td>Advise faculty and staff on activity reporting policies and procedures and how to apply them</td>
<td></td>
</tr>
<tr>
<td>Collect certified reports from faculty, PI and others and retain them according to institutional document retention policies</td>
<td></td>
</tr>
<tr>
<td>Oversee execution of accounting adjustments to ensure federal funds are charged appropriately based on activity</td>
<td></td>
</tr>
<tr>
<td>Monitors to ensure minimum mandatory activity requirements are met</td>
<td></td>
</tr>
<tr>
<td>Have final responsibility for the financial management of their sponsored projects</td>
<td></td>
</tr>
</tbody>
</table>

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<tr>
<th>Policy</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Understand and comply with sponsor requirements for notifications regarding changes in personnel and activity</td>
<td></td>
</tr>
<tr>
<td>Ensure that commitments of activity for all awarded personnel on federal grants on awards are met within the flexibility allowed in the sponsor’s guidelines</td>
<td></td>
</tr>
<tr>
<td>Certifies their own effort and certifies staff effort or designates someone with a suitable means of verification that the work was provided to certify staff</td>
<td></td>
</tr>
<tr>
<td>Certifies effort in a timely manner</td>
<td></td>
</tr>
<tr>
<td>Communicates with project directors on multidisciplinary/multinstitutional awards to ensure commitment of activity has been met</td>
<td></td>
</tr>
<tr>
<td>Clarify personal activity in a timely manner and if designated by PI, certify the activity of their staff personnel</td>
<td></td>
</tr>
<tr>
<td>Notify departmental administrators to make accounting adjustments as needed and ensure that minimum mandatory activity requirements are met</td>
<td></td>
</tr>
<tr>
<td>Provide notifications of reduction or changes in activity to departmental administrators</td>
<td></td>
</tr>
<tr>
<td>Obtain approval for resulting budgetary changes as needed (Sponsor)</td>
<td></td>
</tr>
<tr>
<td>Ensure compliance with effort reporting policy</td>
<td></td>
</tr>
</tbody>
</table>

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## VII. AWARD CLOSE-OUT

<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notify the PI of the need for completion and submission of the final technical report</td>
<td></td>
</tr>
<tr>
<td>Prepare and submit final technical reports</td>
<td></td>
</tr>
<tr>
<td>Work with units on delinquent reports when notified by agency</td>
<td></td>
</tr>
<tr>
<td>Resolve overdrafts</td>
<td></td>
</tr>
<tr>
<td>Approve resolution of overdraft</td>
<td></td>
</tr>
<tr>
<td>Provide information for closing financial reports</td>
<td></td>
</tr>
<tr>
<td>Review, certify and accept final financial report</td>
<td></td>
</tr>
<tr>
<td>Prepare and approve the final financial report and notify PI</td>
<td></td>
</tr>
<tr>
<td>Request from sponsor that remaining balances be carried forward</td>
<td></td>
</tr>
<tr>
<td>Provide information on other closing reports, such as patents and on equipment</td>
<td></td>
</tr>
<tr>
<td>Maintain the official institution record</td>
<td></td>
</tr>
<tr>
<td>Resolve issues related to late payment and problems with collection of awarded funds</td>
<td></td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Policy</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Review and provide guidance for completion of patent reports</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fills or modifies the account</td>
</tr>
</tbody>
</table>