NEW CONFLICT OF INTEREST (COI) REQUIREMENTS AFFECT RESEARCHERS

In August, the University updated its Policy on Conflict of Interest and Conflict of Commitment and established a new Policy on Conflict of Interest in Research. The need for a new research-related COI policy arose as the result of new federal COI regulations that took effect on August 24, 2012. While many of the COI requirements are not new, there are some significant changes that impact how often Investigators must disclose and what they must disclose.

Table One (to the right) summarizes the key changes in the 2011 amendment to 45 CFR Part 50 Subpart F.

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FROM THE EDITOR

This space is generally used by one of the co-editors to describe the theme of the issue of the RAP Up, but there were so many members to be recognized that I have decided to cede this column so that all of the nominations for recognition could be included. Have a terrific fall.

Alden B. Chang

Alden Chang is a Co-Editor of The RAP Up and a Research Administrator 2 in the Robert H. Lurie Comprehensive Cancer Center’s Pathology Core Facility

The following members received Service Excellence Awards since the last issue of the RAP Up:

- Yolanda Bender
- Alden Chang*
- Eugenie Chao
- Ellen Feldman
- Javier Gonzalez
- Michael Green
- David Hull
- Aaron Rosen*
- Michelle Stallionis
- Katie Thompson
- Mary Lynne Williams

*More than one service award in the period

Congratulations are in order for Michelle Suran whose position was revised from Research Administrator I to Business Manager 3 in the Chemistry of Life Processes Institute.

Jody Hirsh, PhD, has assumed the position of Research Administrator I to support the pre-award activities of the Chemistry of Life Processes Institute.

Andrea Acklin is moving up from a Research Administrator 1 position with Psychiatry and Behavioral Sciences to a Research Administrator 2 position with Medical Social Sciences, effective 10/15/12.

Alden Chang moved from the Office for Research Development to the Robert H. Lurie Comprehensive Cancer Center’s Pathology Core Facility, effective 9/17/12.

Alice Camacho’s peers want to recognize her for the fantastic work she is doing in Hematology/Oncology. Great job, Alice!

Correction:

In the last issue of the RAP Up, Donna Kwiatkowski was incorrectly listed as receiving an award for fifteen years of service. Donna actually received an award for twenty years of service.

Congratulations to the following NURAP members who recently received a length of service award.

Five Years of Service
Joseph Boes, Eugenie Chao, Tyra Darville-Layne, Javier Gonzalez, Kelly Morrison, Bryan Runkel

Fifteen Years of Service
Andrew Ludington

Twenty Years of Service
Kathleen Cook

Twenty Five Years of Service
Kathleen Mandell

Mary Rosenthal was promoted from Grant and Contract Administrator to Senior Research Administrator, Northwestern University’s Feinberg School of Medicine, Research Administration Services, effective 10/1/2012.
There is a joke Research Administrators tell, it’s almost a cliché: “No one grows up wanting to be a Research Administrator.” Ours is a profession that most people seem to fall into – in fact, there are as many stories about how one becomes a Research Administrator as there are Research Administrators. A colleague of mine jokes about how he actually thought he was interviewing for a different job entirely. Another colleague explains that this is her third career and probably her favorite. I think back to my start nearly fifteen years ago and remember my mind swimming with all the new terms and acronyms being bandied about – how would I ever understand this complicated field where things always seemed to be changing? Sometimes in those early days I felt like I was climbing a sand dune, taking giant steps only to slide backwards almost as far as I had reached with that step. But with each step I did make a tiny bit of progress and over time things just started to come together. I didn’t say things got easier or that they even made sense, because that’s not always true in our profession. But I slowly learned and grew more confident in my abilities. While initially Research Administration chose me, in the end I have also chosen Research Administration.

The difference nowadays, compared to my start in the field years ago, is that there are now many more people in this field. This is why it became apparent that there was a need for an organization like NURAP. Of course, there are the two well-established professional societies: NCURA (National Council of University Research Administrators) and SRA (Society of Research Administrators International). These groups go a long way towards providing education and support for people in our profession. But it made sense to a small handful of us to form a local group based at our home institution, a group that could offer local support, supplemental education opportunities and networking.

That local part is key: who better to help you understand an NU system than another NU employee? Who better to mentor you than someone from just across campus? How much more convenient to network with other Research Administrators at the same institution? Why not a grass roots group to help our own?

I love telling the NURAP story. In the autumn of 2008, eleven of us convened a Steering Committee. We elected officers, drafted bylaws and soon presented a proposal for our fledgling organization to the Vice President for Research. We agreed on the tagline: “Fostering Professional Excellence.”

By May of 2009 we were ready to plan our first events: a series of networking sessions to get the ball rolling. When over two hundred people signed up as NURAP members BEFORE our first event, we knew we were on to something! Those early events were amazing – it seems like everyone showed up. We had Deans and Directors addressing the group, there was an amazing buzz in the air and people were genuinely excited. There is something very powerful in giving identity to a group of people with a common purpose. I believe that part of NURAP’s cachet is indeed that sense of community. Suddenly we had a club of our own; we knew there were others who could share anecdotes, offer advice, commiserate over challenges and also take pride in each other’s accomplishments, both as individuals and as a group.

NURAP went on to offer the first NURAP@Noon session in October of 2009 and I am very proud to say that we have held either an education or networking event every month since. We have also shared the NURAP model in presentations at both NCURA and SRA meetings. When Research Administration Professionals from other institutions heard about what we have been able to create, they were excited. Many of them pledged to found similar groups at their home institutions. It was so great to share this idea with our colleagues beyond Northwestern.

I am so very proud of NURAP. I am proud of the way so many people have worked together to make this group happen – it really does take a village! It has been an honor, a privilege and indeed a joy to serve as the Founding President of NURAP for the past few years. As I pass the torch to NURAP’s new President, I feel confident that we have created an organization that will stand the test of time.

Lori Palfalvi will continue to support the Steering Committee as a member and as Immediate Past President. She is a Research Administrator 3 in the Department of Medicine.
Being a department administrator can feel very lonely. This is especially true if you're the only one in your unit who performs your function, whether it's entering payroll, submitting proposals, or dealing with your super-crazy-funded PI. I have always stressed, in my columns and when mentoring colleagues, that it's important to reach out to others for help. But here's a secret: as an extreme introvert whose greatest fear is looking stupid, I sometimes feel guilty and awkward asking for help.

Here's another secret: the best way I've found to overcome this challenge is to make sure that when others reach out for assistance, I respond in the way that I would want people to help me. I then feel much more comfortable asking others for help, because I know I'll pay it forward the next time. Here are some ways you can be that helpful colleague for others.

Tell people when something isn’t urgent. As research administrators, our default assumption tends to be that everything is urgent. That’s better than the opposite approach, but it can be very stressful. I love it when a colleague sends me a deadline when they ask for something, because then I know where I should put it on my priority list. Some days, even “I don’t need this until tomorrow” makes a big difference. Being explicit about deadlines is especially helpful when those inevitable actual urgent requests arrive, because you know what you can put aside.

Keep all of your bio sketches, other/current support, or other personnel forms updated and in one place. I’ve lost track of how many times I’ve been able to make someone’s day by quickly pulling up a recent Other Support file for one of my faculty. Not only will this help on your own proposals and save you from dropping everything for someone else’s request, it’s a pretty simple way to make yourself look good and stay off colleagues’ naughty lists.

Find out what’s easier for the other person. Maybe the other administrator’s Co-Investigator is more likely to listen to you (the PI’s administrator), but maybe the Co-I ignores emails that come from strangers. All faculty are different, so trust your colleagues about the most efficient ways to work with their faculty and offer to do what they think will work best. Likewise, if someone’s having trouble getting something from your PI or department, intervene or make suggestions based on your experience.

Provide templates and samples. Another Feinberg administrator probably knows what an NIH bio sketch looks like, but if you’re working with an unusual sponsor or a new formatting change, it’s nice to send an example or share your spreadsheet so the other person doesn’t have to start from scratch. You already did the work researching the format to record your own PI’s information; there’s no sense in having someone else duplicate it. If you’re not sure whether to send an example, at least mention in your request that you have one available.

Explain any problems in detail. “I tried to access the system in Internet Explorer using the link shown in your email, but when I got to Step 3 I received an error message, which I’ve pasted below so you can see it” is a much more easily solvable problem than “I got an error, what do I do?”. Whether your problem is technical in nature or not, always let your colleagues know which parts of a process/question you were able to complete/understand successfully, where exactly things went wrong, and what happened that was unexpected. This avoids back-and-forth messages and shows your colleague that you want to solve the problem together, not just pass the buck.

Be responsive. There are few things worse than being under a deadline and feeling like your increasingly desperate emails or voicemails are just going out into the void. If you get an urgent request from a colleague, a simple acknowledgement that you’re working on it (e.g. “The PI is out of the office today but I should have this to you in time for your Wednesday deadline”) can go a long way. Then the colleague knows she can focus her attention on other items, and you get fewer panicked “HELLO? IS THIS THING EVEN ON?” emails.

These steps aren’t rocket science, but they take thought and effort to implement consistently. That effort will be rewarded with strong professional relationships and a smoother-running workplace that ultimately benefits your investigators.

Susan Morris is the author of the Department Dossier column and a Research Administrator in the Department of Biomedical Engineering.
Because the disclosure requirements and definition of significant financial interest (SFI) have been broadened and the dollar thresholds lowered, the need to systematically capture and manage the substantially larger volume of disclosures required the move from the paper OSR-100 form to an electronic system. The Faculty and Staff Information System (FASIS) now includes a research COI disclosure module, and the Northwestern Conflict of Interest Office (NUCOI) has been created to implement and administer all COI requirements for the University.

Northwestern must consistently maintain the highest ethical standards in its academic, research, and business activities. Even prior to implementation of the new research-related COI requirements, the University was moving toward the centralization of its annual faculty, annual staff, and research COI processes. NUCOI is responsible for implementing and administering the University’s COI policies and related processes, providing COI training and education for the University community, conducting preliminary reviews of all COI disclosures, and providing guidance and support for the COI Oversight Committee, Staff COI Committee, and School COI stakeholders.

Since becoming the NUCOI Director in mid-September, I have engaged in continuous outreach efforts with each of the Schools and central offices critical to administering and complying with COI requirements. As with anything new, there are system kinks to remedy and clearer business processes to establish and communicate. NUCOI has received hundreds of calls and e-mails relative to the new COI system and processes, and we are actively assessing and implementing many changes and enhancements. You may have noticed that the automatic COI emails from FASIS generated when a proposal is submitted in InfoEd have ceased if the system recognizes that an Investigator has already completed a COI disclosure in the previous 30 days. The automatic email text itself contains clearer instructions regarding accessing and completing the training and disclosure requirements. Other enhancements, including the implementation of proxy ability, clearer portal page access, and quicker functionality for “no change” disclosures are rolling out soon. The COI website is being revamped and will include updated FAQs and policy and process clarity.

There will be ongoing communication and education as we clarify and enhance various aspects of our policy, systems, and processes.

We appreciate the patience and cooperation of the University community as we work to implement applicable regulatory requirements in the least onerous manner possible. Our success in doing this will improve with time.

For more information:

COI Office website
http://www.northwestern.edu/coi/

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**NURAP CRA STUDY SESSIONS**

⇒ Have you been wondering if NURAP would sponsor CRA Exam Study Sessions again?

⇒ Don’t know what the CRA (Certified Research Administrator) Exam is, but interested in advancing your career in research administration?

⇒ Or, just looking to increase your formal knowledge within your career field?

If you answered yes to any of these questions, or if you are just curious what it might mean to become a Certified Research Administrator then you should know that there will be Informational Meetings on each campus. The Informational Meetings will address the importance of research administration, what the CRA exam is, why you might want to take it (or not), what the NURAP CRA Study Sessions can provide you, and a general timeline for study sessions. You might even be lucky enough to hear directly from some current CRAs at NU to get their take on the exam. After the Informational Meetings there will be an Orientation for the study sessions in December, and sessions will begin in January.

Evanston: November 27 at Noon, Chambers Lower Level
Chicago: November 28 at Noon, Lurie-Gray Seminar Room

Julia Campbell is the Director of the new COI Office and a special contributor to this edition of the RAP Up.
**Question:**
For what transactions must I submit original documents in order to get ASRSP approval?

**Response:**
Original documents are required for the following transactions. ASRSP will not approve the following until we receive the documents.

1. **Expense Reports**: original signature and receipts are required.
2. **Contracted Services Form**: must be signed by the PI and school.
3. **Wire Transfers**: originals or email with all documentation are accepted. However, choose one option; do not submit originals and an email.

Transactions that just need forms and receipts uploaded into NUFinancials:

1. **Online Vouchers**: (which include Visitor’s Expense Reports and DPRs) need the invoices/forms attached. Do not send original documents. Keep those in case of an audit of your records.
2. **Actuals Journals over 90 days**: require a certified 90 day form attached to the online journal. Please keep the original among your records. Note: Certification must be from the PI of the grant.

*To avoid confusion do not submit the original paperwork for documents uploaded in NUFIN.*

Transactions that require signed documents to be sent via email:

1. **Subcontract invoices**: The PI must approve all subcontract invoices. However invoices must not go directly to A/P. They need to come to ASRSP for secondary review for subcontract monitoring; then ASRSP will send them to A/P.

**Question:**
Why am I being told that expenses are being disallowed after they post? Doesn’t ASRSP approve my transactions?

**Response:**
ASRSP doesn’t review all POs in workflow. Actually a Purchase Order that is less than $2,500 requires only a department/school approval. Procurement card expenses assigned to grants through the PCD system are also not approved by ASRSP. At close out time ASRSP reviews the expenses on the award. The allowability of an expense may need more documentation. If it is determined that something should be removed, ASRSP will request a non-sponsored chart string. If one is not provided within 30 days, the department chart string will be charged.

It is important to understand cost accounting principles established by the federal government so you can make proper decisions when purchasing items on grants. It is also imperative that all approvers at the department and school level understand their responsibilities. If you have any questions or wish to learn more about federal cost accounting principles, please contact ASRSP.

Items to watch for: Journal spreadsheets are not approved by departments being charged nor by ASRSP. The spreadsheet submitters and approvers should understand what can and can’t be charged to grants.

Do you have a new employee who will data enter PO’s or submit Expense reports for your department? Have them come to ASRSP for some post award training!

**Katherine Mustea** is the author of *Kathy’s Korner* and is a Contract Finance Administrator in Accounting Services for Research and Sponsored Programs.
EVENT PHOTOS

MORTENSON NETWORKING EVENT

OCTOBER NURAP AT NOON