



SOCIETY OF  
RESEARCH  
ADMINISTRATORS  
INTERNATIONAL

Research Administrators International (RAI) is a global organization of research administrators who work in higher education, government, and industry. RAI provides a variety of services to its members, including professional development, networking, and advocacy.

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Pre-Award Coordinator  
Herff College of Engineering  
The University of Memphis

# Agenda

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## Common Problems (not Exhaustive)

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## Common Problems – Limited Resources

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# Limited Resources – Best Practices

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## Common Problems – Standardization

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

















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كربلاء





## A stylized illustration of a desk setup. On the left, a grey adjustable desk lamp with an orange conical shade is positioned. In the center, a laptop is open, displaying a document with horizontal lines. To the left of the laptop, a stack of three books is visible, with the top one having a white cover and the others in shades of grey and orange. A small orange circular object, possibly a paperweight or a decorative item, sits on top of the books. To the right of the laptop, a black ruler and a yellow pencil are placed vertically. In the bottom right corner, there is an orange mug. The background is a solid light grey. In the top right corner, there is a small blue logo consisting of a stylized 'K' and 'J' intertwined.

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# Common Problems – Compliance

## 2 CFR §200 Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards

1. The grantee must maintain accurate records of all costs incurred in the performance of the federal award.

2. The grantee must maintain accurate records of all personnel costs incurred in the performance of the federal award.

3. The grantee must maintain accurate records of all travel costs incurred in the performance of the federal award.

4. The grantee must maintain accurate records of all materials costs incurred in the performance of the federal award.

5. The grantee must maintain accurate records of all other direct costs incurred in the performance of the federal award.

6. The grantee must maintain accurate records of all indirect costs incurred in the performance of the federal award.

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9. The grantee must maintain accurate records of all costs incurred in the performance of the federal award.

## Common Issues – Compliance

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# Best Practices – Compliance

## Stop Work Orders and Terminations

- **Uniform Guidance**

Pre and Post April 22, 2024, revisions  
(applicable to awards on or after  
10/01/2024)

- **Agency Regulations**

NIH, NSF, USAID, NEH, etc.

- **Award Terms and Conditions**

Grant, Agreement, Subcontract, etc.

### UG 200.340 –Termination

Federal Awards may be terminated in part or its entirety:

- (1) By the federal agency for the recipient's non-compliance with the award terms and conditions
- (2) By federal agency with the recipient's consent;
- (3) By the recipient with justification to the federal agency;
- (4) By the federal agency if “**an award no longer effectuates the program goals or agency priorities.**”

**2 CFR § 200.340(a)(4)**

# Best Practices – Compliance

## Terminations – Appeal Process

### Uniform Guidance and Agency Process

#### Notification (UG 200.341)

“Must provide written notice of termination” (reason for termination, effective date)

#### Opportunities for objection, appeals, and hearing (UG 200.342)

#### Federal Agency must:

- “maintain written procedures for processing objections, hearings, and appeals”
- “provide the recipient with an opportunity to object and provide information challenging the action”
- “comply with any requirements for hearings, appeals, or other administrative proceedings”

#### NIH:

- Within 30 days, first appeal to designated NIH official specified in the notification of an adverse determination
- Then, appeal the decision to the Departmental Grant Appeals Board. (NIH Grants Policy Statement § 8.7)

#### USAID:

- First appeal to be filed with the Agreement Officer (AO).
- Then, an adverse decision of an AO can be appealed to the Assistant Administrator within 30 days. (See 2 C.F.R § 700.15)

**NSF FAQ 16** - Terminations of awards on the basis that they no longer effectuate program goals or agency priorities are the final agency decision and are not appealable to NSF.

# Best Practices – Compliance

## Termination - Allowable Costs

### Effects of Suspension and Termination Costs (UG 200.343)

- Costs during a suspension or after termination of a Federal award or subaward are not allowable “unless expressly authorized by the federal agency”
- Exception for costs resulting from obligations “properly incurred” before the effective date of suspension/termination

### Termination and Standard closeout costs (UG 200.472)

- “the incurrence of costs or the need for special treatment of costs, which would not have arisen had the federal award not been terminated.
- “costs must be reasonable, and grantees must use best effort to minimize the costs”
- “closeout costs allowable until the due date of final reports (new revision in 2024)

#### 200.472 Termination

Allowable costs can include:

- Labor costs
- Legal costs
- Disposition costs
- Rental costs
- Subaward costs
- Idle time
- Transportation and storage costs
- Equipment costs
- Accounting and administrative costs
- Costs to provide final deliverable
- Other costs to support termination and closeout

# Common Problems – Communication

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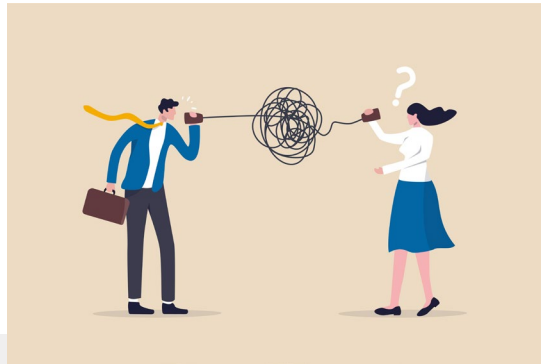
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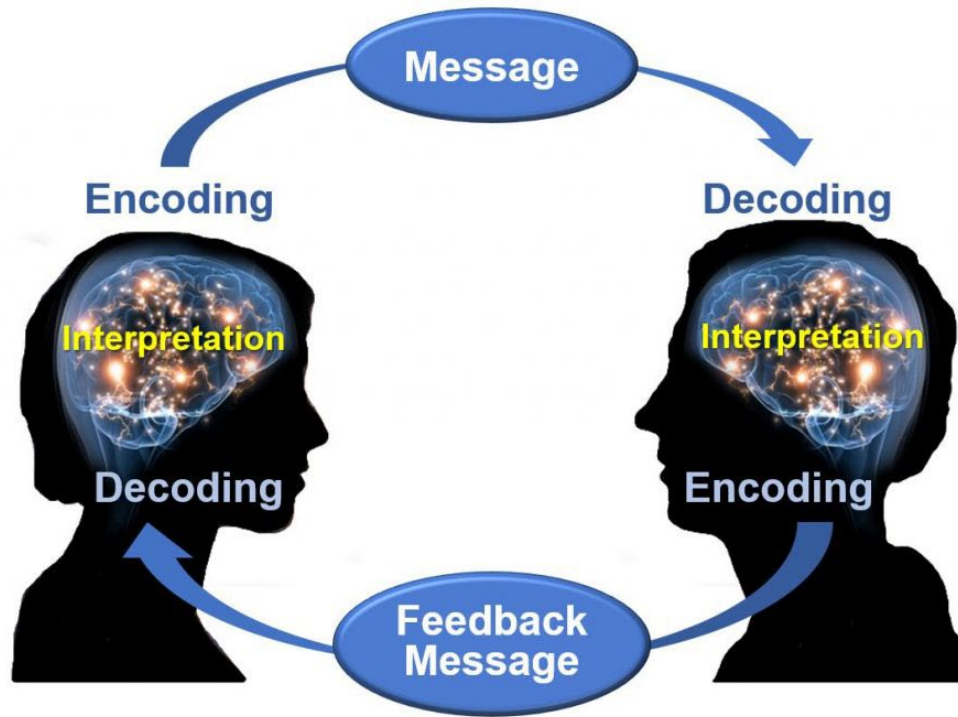
# Common Problems – Communication

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# Common Problems – Communication



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# Common Problems – Complex Funding

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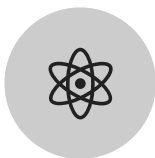
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# Common Problems – Complex Funding

## Problematic Terms and Conditions



**OWNERSHIP OF  
INTELLECTUAL  
PROPERTY (IP)**



**RIGHTS IN DATA**



**PUBLICATION  
RIGHTS**



**DISCLAIMER OF  
WARRANTY**



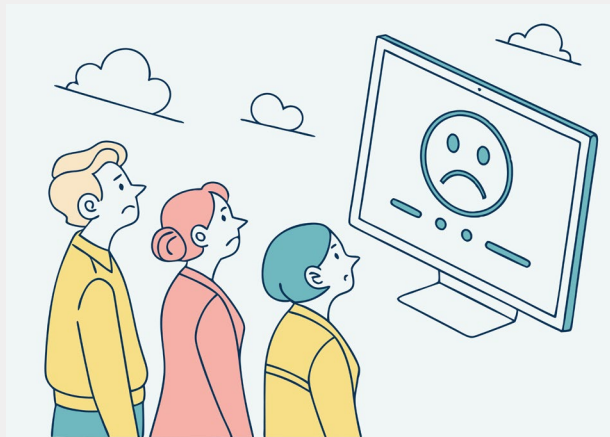
**LIABILITY AND  
INDEMNIFICATION**



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VENUE**

# Common Problems – ERA Systems

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# Best Practices – ERA Systems



Electronic research administration should fully integrate into the institution's overall sponsored program administration processes.



The institution must stay current with respect to the electronic research initiatives of sponsors. (sponsor portals, system-to-system)



Principal investigators must be aware of the sponsor guidelines to prepare proposals, reports, and other documentation in electronic formats, as required.



Internal ERA systems should interact with the institution's financial system. (Banner, PeopleSoft, Workday, etc.)



Multiple modules, SP, 424, COI, IRB, Agreements, etc., should be connected.



Invest in software that can manage the entire lifecycle of a grant.

# Common Problems – Training



- Lack and/or Insufficient training for PIs and Admin staff
- Lack of onboarding and training for new Research Administrators
- Lack of regular updates to training materials
- Have not identified the required training needs for new faculty staff (some institutions require training, some do not).
- FCOI – IRB- IACUC- RCR Training





# Best Practices– Training



Identify who you will be training:  
Faculty, Research Administration Staff, or both?



Conduct Assessments - Focus Groups – Surveys to determine what your target audience needs to learn.



Consider what policy documents and manuals already exist and where there are gaps.



Use Scribe or ClickUp to create guides and videos quickly.



Hold in-person, virtual, and recorded trainings.



Make all trainings available via the website.

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## 1. Reviews

- Internal
- External



## 2. Benchmarking

- Surveys
- Volume of complaints
  - Staff turnover



# Poll Question

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○<sub>7</sub> 7<sub>1</sub> 1<sub>2</sub> 2<sub>3</sub> 3<sub>4</sub> 4<sub>5</sub> 5<sub>6</sub> 6<sub>7</sub> 7<sub>8</sub> 8<sub>9</sub> 9<sub>10</sub> 10<sub>11</sub> 11<sub>12</sub> 12<sub>13</sub> 13<sub>14</sub> 14<sub>15</sub> 15<sub>16</sub> 16<sub>17</sub> 17<sub>18</sub> 18<sub>19</sub> 19<sub>20</sub> 20<sub>21</sub> 21<sub>22</sub> 22<sub>23</sub> 23<sub>24</sub> 24<sub>25</sub> 25<sub>26</sub> 26<sub>27</sub> 27<sub>28</sub> 28<sub>29</sub> 29<sub>30</sub> 30<sub>31</sub> 31<sub>32</sub> 32<sub>33</sub> 33<sub>34</sub> 34<sub>35</sub> 35<sub>36</sub> 36<sub>37</sub> 37<sub>38</sub> 38<sub>39</sub> 39<sub>40</sub> 40<sub>41</sub> 41<sub>42</sub> 42<sub>43</sub> 43<sub>44</sub> 44<sub>45</sub> 45<sub>46</sub> 46<sub>47</sub> 47<sub>48</sub> 48<sub>49</sub> 49<sub>50</sub> 50<sub>51</sub> 51<sub>52</sub> 52<sub>53</sub> 53<sub>54</sub> 54<sub>55</sub> 55<sub>56</sub> 56<sub>57</sub> 57<sub>58</sub> 58<sub>59</sub> 59<sub>60</sub> 60<sub>61</sub> 61<sub>62</sub> 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