

MRAM

March Q&A

Greetings Colleagues,

<u>Meeting materials</u> are available for your review along with a list of links shared during the session. Q&A from our session are included here for reference and will be available with the other meeting materials shortly.

Within a week or so following every MRAM, an email like this one typically goes out with Q&A from the session and a link to the meeting materials.

- EH&S:
 - o Framework for Nucleic Acid Synthesis Screening
 - Dual Use Research of Concern (DURC)
- Research Security Updates
- AIDE Initiative
- Grant Reporting Update
- Subaward Update
- General Questions

Environmental Health & Safety Presentation

EH&S presented on two topics: Framework for Nucleic Acid Synthesis Screening and Dual Use Research of Concern (DURC).

More information can be found in the following links and in the March MRAM material

- Synthetic Nucleic Acid Screening Policy
- DURC-PEPP Policy
- DURC-PEPP FAQs
- NIH Implementation Guidance for DURC-PEPP

Q: Is there any training provided to research faculty to educate them of these requirements? are they supposed to reach out to EH&S prior to submitting their proposal for guidance?

A: We will provide outreach with all the information and expectations including links to the training. We are still working on setting it up.

Other Questions?

- Lesley Decker Biosafety Manager EH&S: <u>lldecker@uw.edu</u>
- Zara Llewelyn Assistant Director for Research Safety
- EH&S: zaral@uw.edu
- ehsbio@uw.edu

Research Security Updates

Review the <u>Research Security Training Requirement</u> message sent to all active PIs & our MRAM listserv indicating the who is required to take the training and that it is available on 3/11/2025.

Q1: My PI wants to take the four Research Security training modules directly from the NSF website. But you mention taking through CITI. Which should they take? Aren't they the same?

A1: While the course material is identical, it is important that <u>covered individuals</u> at <u>UW take the CITI Research Security training courses</u>, by registering at CITI using

the "Log In Through My Organization" method. This tracks the completion in CITI completion records and MRTT. This is what creates the auditable trail

Q2: Is there an implementation date for this research security training? is this training required by all federal sponsors?

A2: The implementation date varies based on the federal sponsor. All federal sponsors will soon require this training for covered individuals.

Q3: Can you tell us how the training is defined by the sponsor but you recommend that all PIs and Key Personnel should take the 4 modules of training? Should they check the requirements for their specific sponsor to determine if it is required?

A3: Yes, always check sponsor requirements when applying for funding - that is going to drive who takes it. PIs and other senior/key personnel, at a minimum, by definition, will be considered "covered individuals" and anyone who serves in these roles should consider taking now, so complete by the time it is a requirement in the next proposal.

Q4: Is there a way in CITI to track who in our department has completed the training?

A4: We will look into this and follow up. In the meantime, you can search for individual investigators' <u>Training Transcripts in MyResearch</u>.

Q5: How often will people need to renew their CITI training?

A5: This is still to be determined as we are awaiting agency guidance on the refresher frequency.

Q6: For anyone who has taken the CITI research security training already, can you share how long it took you to complete (approximately)? Or, is an estimate of time noted on the CITI website?

A6: The training consists of 4 one-hour modules (4 hours in total).

Q7: 4 hours is a BIG ask for this and will definitely get pushback. Is there any way to streamline the training? Either the # of modules or the length?

A7: These are the federally-approved modules. We opted for these as they are accepted broadly and also fulfill other research security related training requirements (for example, travel security training). Yes, it is a large time commitment, which is why we are encouraging covered individuals to start taking

them now.

Q8: Will this apply only to new proposal submissions or to all existing awards as well?

A8: Currently, this requirement applies to new proposal submissions only. If the agency guidance changes on this point, we will update the campus community.

Q9: Do other sponsors such as NIH require this (message lists NSF, DOE and possibly other agencies but did not mention NIH). Also - is this required for predoc or postdoc fellowships?

A9: Yes, all federal agencies have been directed to require this training for covered individuals. We expect to begin seeing in various agencies' NOFOs. NIH will require this soon. It will apply to faculty, staff, and students if they meet the covered individual definition. So, yes, it will apply to fellows; please review NOFO language carefully.

Q10: Do you have to take all four modules at the same time or can you take them as schedules allow, such as taking one module at a time?

A10: Yes, the modules can be taken individually in any order as schedules allow.

Q11: The CITI training includes content for Research Administrators, but administrators aren't generally included in the standard definition of covered individuals. Is there any expectation that research administrators also complete this training, even if not required for a federal grant submission?

A11: At this time, there isn't a separate University requirement that research administrators take Research Security training, although you may take it.

Q12: Is there any potential for changing the training requirement to the JIT stage so that the often (always?) tight timelines for proposal submissions isn't impacted.

A12: Based on the current agency guidance, this cannot be moved to the JIT stage. Agencies will require this at the proposal stage and we can't bypass the certification stage at time of proposal.

Q13: What about named subaward key personnel and individuals at other institutions, foreign or domestic? Are we (Pl/unit) responsible for confirming the subrecipients named have completed the training and if so, do we need to have them include that confirmation in their letter of intent?

A13: All covered individuals named in a subrecipient's proposal that is integrated into UW's application must take the training. That subrecipient entity's signed LOI, signed by their institutional official, is a reflection they will abide by sponsor requirements. We rely on the letter of intent from the subrecipient as confirmation they are following requirements. Note, the training modules are available on NSF's website, if the subawardee doesn't have their own training resources.

Q14: What are the expectations for foreign collaborators with regards to this research security training?

A14: We expect that foreign collaborators, as long as they rise to definition of "covered individual" on the project, would need to take research security training. The sponsor's definition of "covered individual" would need to be considered.

Q15: Will research security training be required for grad students or postdocs holding NSF or other federally funded fellowships? To clarify - will the actual trainees/ fellows holding NSF or other fellowships would be required (not if they are on someone else's research grant). Same question on training grants: are both mentors and the trainees required to take this?

A15: Yes, if they meet the agency's definition of covered individual. We expect trainees and those holding the fellowships will fall under the definition. However, you will need to review the NOFO to confirm this before routing the proposal.

Q16: For those of us who review and approve proposals, can we still approve them knowing the training is pending or can no proposals be submitted until the training is complete?

A16: The Institutional Certification is certifying all covered individuals have completed the training at the time of submission. It must be complete for the proposal to be considered Ready to Submit. If the certification wording varies in the NOFO, that will be taken into account. We recommend that the training be taken as soon as convenient so it is not down to the last few days before proposal due date.

Q17: I support a PI who is retiring in the fall so not submitting further applications but is a current PI. Do they need to take this training?

A17: No. We anticipate we will see this requirement in all federal sponsor policies very soon and the requirement is for completion by covered individuals at the proposal stage.

AIDE Initiative

Review information about this initiative on the <u>AIDE website</u> or sign up for the <u>AIDE</u> listserv.

Q1: How can we provide feedback to AIDE?

A1: AIDE is in early stages, and we will send out requests for input from different stakeholder groups. We will utilize the MRAM channel for this purpose.

Q2: Will stakeholders (campus grants managers) be involved in the process to improve the current work flow? Will user acceptance testing of any systems/processes be tested by end users prior to launch?

A2: AIDE needs input by campus grants managers to participate in workflow process improvements. We will definitely need to conduct user acceptance testing for the different groups that solutions and changes are developed for. AIDE will use the MRAM communications channel to identify people who want to participate in this. So glad you asked!

Q3: Are Subawards included in the AIDE initiative?

A3: Yes, they are included.

Q4: Would be great to get some non central voices on these improvements. It seems only OSP and GCA are having their voices heard/have a seat at the table in team structure on what improvements are needed and how these workflows/processes work for them. Many campus departments must work with these features every day and should have a substantial voice/input.

A4: I (Mandy Mourneault) recognized this early on, and I connected representatives from experienced campus unit research administration and shared environment leads at every meeting. We have just finished examining at the programming of UW's Workday tenant for improvement opportunities. The next step will be to assess the workflows. As we move forward, AIDE will rely on input from campus departments to help streamline and improve the workflows/processes. AIDE will use MRAM membership to obtain this input.

Grant Reporting Update

Take this <u>survey</u> to share your reporting usage and needs info by 3/20.

Q1: Is it possible that campus is not using reports because they are not aware of the report or of the functionality of the report?

A1: Yes, this is possible. <u>The survey</u> includes an exhaustive list of grant-related reports, so the survey itself can serve as a resource of what's out there now.

Q2: There doesn't seem to be an easy way to find all reports or understand what they do.

A2: This is great input. When I started compiling the list for the survey, I realized just how many reporting resources there were. Please include this feedback as part of your survey response so we can take action to make it easy to find the reports you need and understand when to use them and for what purpose.

Q3: Who do I contact about a report I am looking for? I am looking for a report that compares Budget, Expenditures, Amount Invoiced (or Drawn) and Cash Received by Grant Line. The reports I have found (e.g. R1230, the reports tab in Award Portal, etc.) do not include cash received, and do not display budget by grant line. (In some reports the budget is repeated as the full amount for the entire award, or is left blank if it is not the parent budget line.)

A3: Please add this request into the last "open" question into the survey. Alternatively, you can submit a ticket to datagrp@uw.edu and it will create a UW Connect ticket for the FPB DATAGroup.

Q4: Do admins and deans offices have access to the report with all the ASRs and MODs? I think this is a currently limitation.

A4: You sure do, Gretchen, the <u>Application</u>, <u>Awards and Related requests</u> workbook has got all ASRs and MOD requests, they have their own tabs. Simply use the filters to find the ones in the statuses you're interested in.

Q5: Is it possible to get the link to the SharePoint site shown by ORIS with current research data?

A5: Here you go.

Q6: Is there already a report that show us the list of items that are in OSP or GCA's queues? Knowing that the group is behind by XYZ items, does not give us enough information to respond to questions.

A6: The Application, Awards and Related requests workbook has got all ASRs and MOD requests, they have their own tabs. Simply use the filters to find the ones in the statuses you're interested in. For GCA - You can also review this detail on our Metrics webpage. You'll need to be logged in via VPN to see the detail.

Subaward Update

Q1: Our subaward has been pending for the past five months without processing, so we now need to submit an expedite request. What is the typical processing time for a subaward?

A1: Subaward escalations are provided by Dean's Offices to OSP every other Monday. Those items are assigned the following day, as long as the request is complete and accurate. These escalated items become high priority for the OSP Administrator, typically issued within a week.

Q2: I am seeing PO changes happen at the time of subaward issuances as opposed to closer to fully executed. Is this an intentional change?

A2: We reached out directly to this individual about their experience. Processes have not changed in this area recently.

Q3: Will the subaward escalation submission sheets be updated to have tabs through June? Currently at least the Engineering request spreadsheet only goes through Mar 24.

A3: Yes, we will get those updated. Thanks for pointing that out.

Q4: Does OSP continue to issue subawards in the event of a federal gov shut down?

A4: The shutdown was avoided last week. Decisions like this are discussed among leadership for each situation and decisions depend on the situation at the time.

Q5: Will you make exceptions to the assurance letter for freeze if we have a non snap NOA in hand and subrecipients managing recruitments need it in order to continue working on the grant uninterrupted? The subrecipient wants an official letter, not from department.

A5: The campus unit can send an assurance from department to the subrecipient. OSP is unable to send assurances on federal funding at this time.

Q6: Would OSPsubs be willing to issue an assurance letter for a federal award already in a NCE? The NCE was already approved and processed (award lines extended), but the subaward is a domestic entity and they need some kind of assurance that this will be executed.

A6: The campus unit can send an assurance from department to the subrecipient. OSP is unable to send assurances on federal funding at this time.

Q7: It sounds like actions for subawards are expedited in OSP's queue when stop work order or change of scope order is received. Would any other subaward mod requests related to federal grants also be expedited? For instance, getting a NCE processed quickly for a subaward could be critical while program officers are still at the agency and/or the TRO is still in place to continue with funding.

A7: If you are not in the Dean's office, approach your Dean's office contact (ADD LINK) with this situation. If you are in the Dean's office, please reach out to Amanda Snyder acs229@uw.edu.

General Questions

Q1: Does OSP plan to prioritize subs on awards that are at probable high risk of being targeted, but haven't been yet? Climate change is an example.

A1: There are a lot of areas that feel like they are at risk as it relates to federal

funding; it is a bit of a moving target. We are working with our leadership in the Office of Research to identify any areas that require additional prioritization.

Q2: Have you considered using campus volunteers in some capacity to help free up time to clear backlog? Volunteers could be for OSP, OSP subs or GCA.

A2: Central units have been creative with securing support to help manage backlogs (e.g. obtaining more capacity, contract help, and part-time assistance from outside unit).

We look forward to seeing you at our next meeting in April.

Thank you!

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