Research Administration Advisory Council (RAAC) Committee-at-Large

Tuesday, March 19, 2024, 3:00 to 4:30 pm Zoom Meeting (https://umich.zoom.us/j/97095180777) MINUTES

Attendees:

Karen Alameddine – ORSP	Joanne DeVore – U-M Flint	Becky O'Brien – Information
Andrea Anderson – ORSP	Brooke Dougherty Reyes – Medical School	Lauren Orleman – SPH
Kris Beckon – Sponsored Programs	Chris Hansen – Treasurer's Office	Lisa Parker – Nursing
Cheri Brooks – ISR	Teresa Herrick – SEAS	Carolyn Pappas – ITS
Constance Colthorp - ORSP	Jennifer Huntington – ISR	Angie Skellie – OVPR
Kerri Cross – ISR	Laura Kaminski – Ford School	Maggie Swift – Corp. Res. Alliances
Cindy Dames – ORSP	Karen Kirchner – Nursing	Debbie Talley – Sponsored Programs
Jackie Dani – U-M Dearborn	Patrick Lagua – Dentistry	Pat Turnbull – U-M Dearborn
Becky Youmans-DeMoss – Medical School	Jennifer Linzmeier – Dentistry	Bryan VanSickle – Sponsored Programs
Lori Deromedi – OVPR	Charlie Mattison – ISR	Corene Weiland – Education
Chris DeVries – RAAC	Jill Miller – LSI	Rick Wintergerst – Engineering
Kathy Devereux – OVPR	Melissa Milligan – LSA	

The meeting started at 3:00 p.m.

1. **Welcome** (Debbie Talley)

Debbie welcomed everyone to the meeting. Today we have a guest speaker, Chris Hansen, who will provide an update on the Human Subject Incentives Program (HSIP).

2. **Human Subject Incentives Program Update** (Chris Hansen) Attachment #1

Chris Hansen shared the HSIP update and posted a couple of documents: <u>HSIP SSN</u> <u>Policy Change FAQ</u> and the <u>HSIP SSN Collection Policy</u>. He is the Director of Special Programs for the Treasurer's Office and has been in conversation with the IRB, the Tax Director, and the Human Research Protection Program (HRPP) to see what can be done to alleviate some of the burden with collecting information from human subjects to whom incentives are being paid.

SPG 501.07 - ResearchSubject Incentives:

The Human Subject Incentive Program (HSIP) Office is responsible for the distribution, reporting, and monitoring of subject incentives.

U-M places responsibility for financial management in the hands of principal investigators. Individuals in these roles, as well as individuals who have administrative or

study team roles, should clearly understand the financial authority and institutional obligations that accompany these responsibilities.

HSIP SSN Policy for Payments:

Incentive payments have a new policy to make it easier for payments. The new policy will reduce the number of SSNs collected.

The previous policy mandated collecting SSNs from participants if their potential total payment from a single study could exceed \$100 in a calendar year. The updated policy makes two changes to this rule:

- 1. Increases the dollar amount threshold to \$400 in a calendar year; and
- 2. Requires gathering SSNs based on a participant's annual total earnings from all studies, not just one study.

In addition, the current Tier structure is going away and studies will now fall into two tiers: payments up to \$400, and payments over \$400. For studies potentially paying over \$400 in a calendar year, SSNs must be collected before the initial payment.

Methods of payment that are available still include checks, cash, physical single-use prepaid cards, and payment coupons. When payments are made, a mandatory collection of full name, address, and potentially SSN is needed for proper tracking and IRS compliance. For those studies with sensitive populations, there may not be a need to collect information from participants.

Operational Processes:

Conduct weekly audits of all payments made to participants, and notifications will be sent to PIs when participants are near the \$400 threshold.

Compliance Assurance:

HSIP will expect prompt reporting of participant information to HSIP, in instances where a participant is over the threshold. Additionally, informed consent documents will need to be updated to reflect the change in this policy, for those studies that are impacted.

Non-compliance reporting:

If the study team fails to comply, the HSIP may inform the HRPP Director and the study will be flagged in the HSIP System. There will be IRS penalties for non-issue of 1099 to participants earning \$600+ without SSN. It is crucial in ensuring policy adherence and minimizing University and participant exposure to tax-related risks.

HSIP Role:

Monitor participant payments and alert study teams. This policy goes live on April 13, 2024. Notifications will go out to everyone.

Questions? Please contact subjective-incentives@umich.edu

3. **RAAC Training Working with Faculty Poll** (*Chris DeVries*)

The RAAC Training Subcommittee workgroup is putting together a training session focused on how research administrators can build successful working relationships with faculties. Chris put together a request and sent it to RAAC to seek volunteers of their faculty

who would be interested in participating either (a) by answering a survey (2-3 questions) or (b) by participating in the training session (date TBD) to share this information verbally. There was confusion on the poll that was sent out to the faculty as they thought the 2-3 questions would be included. Chris will send out the survey with the questions to this committee to send out to their faculty. The goal is to impart best practices and tactics to other research administrators.

4. RAAC Metrics Subcommittee Update (Melissa Milligan)

Attachment #2

Membership:

Melissa is the new Chair of the Subcommittee. New members on the RAAC Metrics Subcommittee include Ray Martell from ORSP, Dan Mitchell from ITS, and Lauren Orleman from Public Health.

Recent Work:

Employee Effort by Month report: Finalized the report in BusinessObjects and shared it on the RA Forum on Slack in December 2023. It provides effort and compensation for regular employees on projects by PI. It includes temp employees on a separate tab.

FSR visualization in Tableau: Originated from a suggestion by the Medical School related to a report they use to see in Financial Status Reports (FSRs):

- FSRs sent to the department
- Upcoming FSRs.

Provides the ability to subscribe by department, and RA level to receive scheduled email snapshots of a custom view, and has been shared on the RA Forum on Slack.

Foundation Relations Award information: A new report that shows sponsors by award counts and dollars was published. This will help Foundation Relations understand where opportunities might exist to expand relationships with sponsors or direct faculty to sponsors based on their needs. It also allows other units to explore volume by sponsor differently. It is also possible to modify your filters for large amounts of data. A similar format will be published for Proposals and Budget Period Funding by sponsors.

Ongoing Work:

M-Reports Modernization Project:

- Phase I Look and feel changes were implemented on January 18, 2024.
- <u>Phase II</u> A proof of concept for modernizing reports will begin in April 2024. A meeting is scheduled with the RAAC M-Reports Modernization Workgroup on April 16, 2024.

Future Initiatives:

- Making the M-Reports Report Library more well-known among RAs.
- Determine how to offer training and other resources to RAs so they feel confident in using data and metrics in their role.
- Continue to respond to inquiries and requests from all units for additional reports or visualizations.

Debbie thanked Melissa and the RAAC Metrics Subcommittee for the work they have done.

5. **ORSP Update** (Karen Alameddine)

Staffina:

- Karen has been promoted to the new Director, Proposals and Award Management in ORSP
- Currently interviewing for three positions: Director, Contracts; Project Manager Sr.; and Assistant Director, Operations and Administration.
- There are two new job postings: Associate Director, Pre-Award and Policy and Planning Analyst.

Business and Sponsor Update:

PAF: Cancel, Turn Down, Withdraw: ORSP is now following up on requests for the reason why proposals were turned down. When ORSP is notified a proposal is canceled or turned down they will log the "turn down" activity in eRPM.

To improve this process, ORSP will now be following up on requests that do not include documentation to ask that the project team to either provide sponsor documentation, or convey the reason for the turndown as one of the following:

- a) the proposal was non-compliant with the sponsor guidelines (identify which guidelines),
- b) the proposal was reviewed, but not selected for funding, or
- c) the sponsor did not provide a reason."

Federal agencies requesting risk mitigation plans: ORSP has recently started receiving requests for Risk Mitigation Plans from DoD and DoE prior to issuance of an award. The creation of the plan requires involvement from Lisa Nichols' Research Security office to prepare the plan, in consultation with the PI, for submission to the sponsor.

If an award is subsequently issued, it will likely include Risk Mitigation terms and conditions that will require review by the Research Security office. A process is being developed in eRPM to handle the Risk Mitigation reviews similar to how Export Control Reviews and IT Security Reviews are currently processed.

Department of Justice (DoJ) JustGrants Checklist: DOJ recently shared an Application Submission Checklist with step-by-step support for JustGrants, DOJ's grants management system. As a reminder, applications to DOJ involve a two-step process:

- first, submit an abbreviated application via Grants.gov.,
- then complete and submit the full application in JustGrants.

FY 2024 NIH Grants Policy Statement will be issued in March: NIH announced that the FY 2024 NIH Grants Policy Statement (NOT-OD-24-069) will be issued in March. (Last month we shared links to NIH's Webinar which shared what's coming. See ORSP website and February RAP.

Grants.gov Outage: Their Production site will be down on Monday, April 22, 2024. Learn more on system enhancements and server maintenance outages on the <u>Grants.gov</u> website.

Spring 2024 NSF Grants Conference: The spring Grants conference will be held in Philadelphia on June 3-5, 2024 and will be streamed.

OVPR Updates: The <u>Faculty Honorifics Office</u> recently launched a newsletter to encourage broad awareness of, and encourage submissions for, upcoming honorifics and awards.

The newsletter, published three times a year, will primarily consist of InfoReady links to candidate suggestion forms for upcoming honorifics and awards. Those interested in staying updated with ongoing calls for suggested candidates can <u>subscribe to the newsletter</u>.

Kathy asked about the turndown requests and whether there will be an update in eRPM to reflect the change. Karen responded that there will be updates to ePRM for this. Kathy followed up by asking if the information related to the reasons for turndown will be available on the ORSP website. Constance will discuss with Andrea Anderson and should be coming out soon.

Patrick asked if ORSP will reach out to the department for the reason the proposal was turned down? Karen responded that for the automatic turndowns that happen after 18 months of no response, those will be turned down for merit. Patrick asked about the reasoning for doing this now and Karen answered that the goal is to make sure there is accurate information around reasons for turndown so metrics are correct.

6. **ITS Update** (Carolyn Pappas)

There will be a longer break between releases, and the next release will be in mid-June and Carolyn will have an update next month.

7. Sponsored Programs Update (Debbie Talley)

4:15-4:25

Staffing:

Scott Stanfill is leaving to take a position in Family Medicine.

Single Audit:

The Single Audit is complete. No findings in R&D, but the focus was on Financial Aid. R&D will be the focus of the next audit.

NIH Foreign Subrecipients:

NIH now requires we have access to the documents in the reports for all research with foreign subrecipients.

The requirement was to amend all current subcontract documents and include that we have access to all documentation for subrecipients' research. The Contract Administration team is working on this new requirement. The next step is to include all language, and NIH awards that are coming up to the end date and will be posted in the eRPM comment section. It should go out in the RPPR section up to 120 days after the end date. Need to have an attestation to the documents.

There are already posted comments, and there are about 120 foreign subs that it applies to.

8. Closing and Future Meetings (Debbie Talley)

4:25-4:30

The next meeting is Tuesday, April 16 with a presentation from the RAAC Process Subcommittee.

The meeting ended at 3:40 p.m.

RAAC Committee-At-Large Meeting Dates (all meetings 3:00-4:30 p.m., unless otherwise noted)

- Tuesday, April 16, 2024 (Anne Thomson, RAAC Process Subcommittee)
- Tuesday, May 21, 2024 (*Nick Prieur*, RAAC Training Subcommittee)
- Tuesday, June 18, 2024 (Becky Youmans Demoss, RAAC Communications Subcommittee)

Executive Committee Meetings (all meetings 3:30-5:00 p.m., unless otherwise noted)

- Tuesday, April 9, 2024
- Tuesday, May 14, 2024
- Tuesday, June 11, 2024

HSIP SSN Collection Policy Change



Overview of HSIP & New SSN Policy for HSIP Payments

SPG 501.07

Research Subject Incentives

...The Human Subject Incentive Program (HSIP) Office is responsible for the distribution, reporting, and monitoring of subject incentives....

The University of Michigan places responsibility for financial management in the hands of principal investigators. Individuals in these roles, as well as individuals who have administrative or study team roles, should clearly understand the financial authority and institutional obligations that accompany these responsibilities.

HSIP SSN Policy for Payments

The new policy will reduce the amount of SSN's collected by research teams. The impact will minimize sensitive data study teams collect and create more flexibility in recruiting research study participants.



Revised Policy for SSN Collection & Impact

- <u>Policy Change</u>: 1) Transition from single-study to cumulative-payment tracking for SSNs and 2) increases dollar amount threshold to \$400 for collecting SSNs.
- Reasons for Change:
 - Ensure IRS compliance and enhance flexibility for participant compensation.
 - Reduce amount of data we store (less SSNs collected)

Table 1. Current HSIP Participant Personal Information Collection Policy Structure - Focused on total payment amount of an individual study over the duration of a calendar year wherein studies could request and receive exceptions.

Information study is required to collect of participant	Tier 1 - Study pays less than \$100 to participant over duration of <u>a calendar</u> <u>year</u>	Tier 3 - Study pays \$100-\$599 to participant over duration of <u>a calendar</u> <u>year</u>	Tier 5 - Study pays \$600 or more to participant over duration of <u>a calendar</u> <u>year</u>		
Full Name	у	у			
Permanent Address	у	у	у		
SSN	n	у	у		
Payment Amount	у	у	у		
Payment Date	у	у	у		
Participant Email	optional	optional	optional		

Table 2. <u>New SSN Policy Structure</u> - Focused on total payments across all studies an individual participant has received in a calendar year.

Information study is required to collect of participant	Tier A - Study pays \$400 or less to participant over duration of <u>a</u> <u>calendar year</u>	Tier B - Study pays \$401 or more to participant over duration of <u>a calendar year</u>			
Full Name	у	у			
Permanent Address	у	у			
SSN	n	у			
Payment Amount	у	у			
Payment Date	у	у			
Participant Email (if available)	у	у			



Payment Distribution Methods & Participant Information Collection

- <u>Methods of Payment</u>: Checks, reloadable prepaid cards (physical and virtual), cash, single-use prepaid cards, and payment coupons via direct mail or disbursed by study teams.
- <u>Collecting Participant Data:</u> Mandatory collection of full name, address, and SSN (as needed) for proper tracking and IRS compliance.
 - Full name and address information must be collected for all participants, regardless of payment amount.
 - SSN collection necessary when either a study is paying more than \$400 in total compensation or a participant has, through multiple studies received more than \$400.
- <u>Exception Process</u>: Requests for exceptions to this policy should be submitted in advance of payment distribution to the HSIP Office.



Operational Processes & Study Team Responsibilities

- <u>Audits and Alerts</u>: Regular weekly audits by HSIP; notifications sent to PIs when participants are near the \$400 threshold.
- <u>Compliance Assurance</u>: Prompt reporting of participant information to HSIP; possible shift to direct mail distribution in cases of non-compliance.
- Non-Compliance Reporting: Informing HRPP Director and study being flagged in HSIP system.
- <u>Informed Consent Updates</u>: Explicit notification requirements regarding SSN provision for payments within informed consent documents. IRB reports for withdrawals related to SSN collection.



Implications of Non-Compliance & Consequences

- <u>IRS Penalties & University Responsibility</u>: IRS penalties for non-issue of 1099 to participants earning \$600+ without SSN; adherence to federal grant terms.
- <u>Study Teams Role</u>: Crucial in ensuring policy adherence and minimizing University and participant exposure to tax-related risks.
- <u>HSIP Role</u>: Monitor participant payments and alerting study teams when information is needed.

Questions? Please contact subjective-incentives@umich.edu
Policy Text
FAQ





RAAC Metrics Membership

Chris Allan – ISR

Steve Beach – LSA

John Cristiano – U-M Dearborn

Chris DeVries – RAAC

Laura Dickey – ORSP

Stephanie Hensel – *Education*

Jennifer Huntington – *ISR*

Rachael Lee – Engineering

Adam Mall – Sponsored Programs

Rey Martell - ORSP

Melissa Milligan – LSA (Chair)

Dan Mitchell - ITS

Lauren Orleman – Public Health

Susan Powell – *Engineering*

Vasu Ramani – ITS

Susan Sica – Medical School

Polly Simms – ORSP

Since the last update in June 2023, Dan Mitchell succeeded Mike Randolph, representing ITS. Rey Martell joined from ORSP, and Lauren Orleman from School of Public Health. Additionally, Melissa Milligan assumed the Chair role, as of March 1, 2024, succeeding Jennifer Huntington.





Recent Work

- Employee Effort by Month Report
- FSR Visualization in Tableau
- Foundation Relations Award Information

Employee Effort by Month Report

- Previously shared information about this in June 2023 update.
- Finalized the report in BusinessObjects and shared on the RA Forum on Slack in December 2023.
- Provides effort and compensation for regular employees on projects by PI.

All Employee Effort by Month by PI [HR]

Use this report to return the effort or compensation by month for all regular employees appointed on a project of the list of PI Uniqnames entered in the prompt. The output will show all effort for the employee (i.e. will not be limited to just effort for the prompted PIs' Projects). Effort exceeding 100% in a month will be highlighted in yellow.

For the Begin Date, be sure to enter the first of a month. Begin Date can start in July 2001.

For the End Date, be sure to enter the last day of a month. End Date can be three years from the current month.

Temporary employees are not included in the effort crosstabs so their Department Budget Earnings (DBE) data is displayed in the final tab of this report.

It will be best to view the report(s) after an export to Excel as columns may display on separate pages in BusinessObjects.

| Begin Date (min July 2001) | 03/01/2023 | | End Date (max three years in future) | 02/29/2024 |

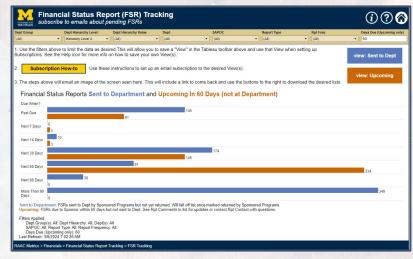
1	Shortcode	03/2023	04/2023	05/2023	06/2023	07/2023	08/2023	09/2023	10/2023	11/2023	12/2023	01/2024	02/2024
ition in scleroderma endothelial cells (007890									5.00	5.00	5.00	5.00
al ACE, Collaborative Project: Valid	008398	50.00	50.00										
of F068182-FP-YR8-Immune Tolerand	011561	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	
al ACE, Collaborative Project: Valid	012334			74.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00	50.00
e Cytotoxic CD4+ Lymphocyte Subse	013975									10.00	34.00	34.00	35.00
)-M Development of the anti-CD6 mor	492429	24.00	24.00										
Inhibition in Lupus/Autoimmunity (All	494652				24.00	24.00	24.00	24.00	24.00	24.00			
	940712	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
volvement in systemic sclerosis	231010	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15.00				

FSR Visualization in Tableau

 Originated from a suggestion brought by the Medical School, related to a report they use to see Financial Status

Reports (FSRs).

- FSRs Sent to Department
- FSRs Upcoming
- Ability to subscribe, to receive scheduled email snapshots of a custom view.
- Shared on RA Forum on Slack.



Foundation Relations Award Information

- As a result of a request from Foundation Relations, we published a new report that shows sponsors by award counts and dollars.
- This will help Foundation Relations understand where opportunities might exist to expand relationships with sponsors or direct faculty to sponsors based upon their needs, but this also allows other units to explore volume by sponsor in a different way.
- Will also publish a similar format for Proposals and Budget Period Funding by sponsors.



Ongoing Work

- M-Reports Modernization Project
- Planning Future Initiatives

M-Reports Modernization Project

 Phase 1: Look-and-feel changes were implemented on January 18, 2024.

• Phase 2: Proof-of-concept for modernizing reports is

scheduled to begin in April 2024.

 Meeting scheduled with the RAAC
 M-Reports Modernization Workgroup on April 16, 2024.



Planning Future Initiatives

- Looking to make the M-Reports Report Library more well-known among RAs.
- Determining how to offer training and other resources to RAs so they feel confident in using data and metrics in their role.
- Continuing to respond to inquiries and requests from units

 academic and central for additional reports or visualizations.

