# Overview of Upcoming Changes: PAF Investigator Signature, "Other Support" Review

## September 1, 2020

*(The information presented is current as of September 2020)*

**Navigate Team: navigate-research@umich.edu**

**David Mulder - ORSP**
**April Pepperdine - UMOR Conflict of Interest**

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# Background & Context

- Heightened interest and scrutiny at the federal level regarding potential foreign influence and the need to fully disclose international engagements

- January "Other Support" update was one part of the University's approach

- Recent addition of PAF "Foreign Component" questions were another

- Expanded "Sign PAF" activity "Other Support" review are additional parts

- Changes being implemented September 14, 2020

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# Background & Context

9.  How can an Authorized Organizational Representative (AOR) "certify" representations that its employees may make regarding current or pending support based on information not available to the organization?

In most cases, NSF accepts proposals from and awards grants to an organization, not to an individual. In submitting a proposal and/or accepting federal funds under a grant instrument, proposers/grantees assume legal and financial responsibility and accountability for the content of the submitted proposal, any awarded funds and the performance of the grant-supported activity.

As such, proposers/grantees are responsible for all information and data provided to the federal agency under the proposal or grant agreement, and may need to confirm the accuracy and completeness of the information that its employees provide to the AOR in order to appropriately comply with NSF's policies on reporting current and pending support. NSF does not dictate the terms of or interfere with the employment relationship between the grantee organization and its employees. Organizations will need to establish whatever internal communication or other processes they believe are necessary in order to provide the required current and pending support information.

# Assumptions, Caveats, Disclaimers, etc.
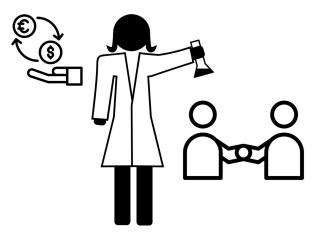
- Pilot Phase begins with the September 14 eRPM release

  - Scope for system changes is limited to minimal touchpoints
    - PAF
    - Award Creation/Set-up
      - "Manual" processes being developed for post-award (e.g., PACR)

  - Limiting ITS development work (when possible)

  - Limiting ORSP Staff involvement

  - What we learn from the Pilot Phase in terms of <u>volume</u> and <u>complexity</u> will significantly influence how we proceed in following phases

  - Export Controls is also leveraging data (from both Foreign Components and International Engagements)

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# Terminology

## International Activities



Foreign Components

International Engagements
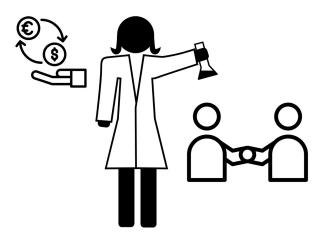
# Terminology

## International Activities



### Foreign Components

**Where** <u>this</u> work is happening
- Project-specific
- Doesn't matter who is doing the work
- PAF Question 5.13

### International Engagements

**Resources** and **Relationships** supporting <u>any</u> of a **person's** research endeavors
- Person-specific
- Doesn't matter which project
- "Sign PAF" Activity

# Terminology

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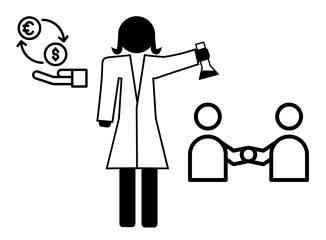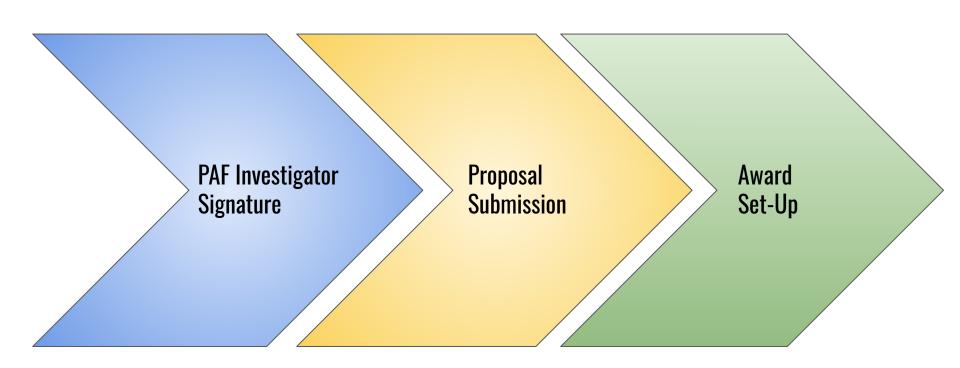**Need to be disclosed and assessed to meet sponsor requirements to mitigate potential risk of Foreign Influence**

# Process Touchpoints



PAF Investigator Signature

Proposal Submission

Award Set-Up

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PAF
Investigator
Signature

- All U-M investigators on a PAF will be required to complete the "Sign PAF" activity.

  ⚠️ Investigator must have an up-to-date (within 365 days) M-Inform disclosure on file.

- "Sign PAF" sections:

  ○ Confirmation of Outside Activities, Relationships, and Interests

  ○ Confirmation of International Engagements Disclosure

  ○ Investigator Signature "Attestation"

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[Conditionally display from "WARNING" to the end of the sentence "Close this window..." (all the red text)if M-Inform disclosure is not on file or is not within the past 365 days.]

**WARNING: You last disclosed in M-Inform as of <date>.**

*OR*

**WARNING: You have not yet disclosed in M-Inform**

**Disclosure is required prior to completing this activity.Click here to go to M-Inform and complete your outside interest disclosure.**
**Close this window and re-run the "Sign PAF" activity after completing your outside interest disclosure.**

**OUTSIDE ACTIVITIES, RELATIONSHIPS, AND INTERESTS RELATED TO THIS PROJECT**

1. Do you or your family members have an outside activity, relationship, or interest with a non-UM entity, where the non-UM entity is:
   - Sponsoring this project;
   - Providing or supplying a product (e.g., an app, device, compound, drug, software, survey, evaluation) used in this project either for free or at a cost (e.g., purchased);
   - Holding an option or license to intellectual property used in this project (e.g., a device, compound, drug, software, survey, evaluation, code, data, schematics, algorithms) that you or your family member developed;
   - Performing work on this project (e.g., subcontract, service agreement, unfunded agreement); or
   - May have a financial stake in the outcome of this research?

◉ Yes    ◉ No

<If the answer to Q1 is "yes", conditionally display and require:>

**If you have not already done so, you must disclose this outside activity/relationship/interest in M-Inform. U-M will not award this project until your disclosure has been submitted, reviewed, and managed, as appropriate.**

Please provide the name of the outside entity or entities and a brief description of the outside activity/relationship/interest(s):

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**INTERNATIONAL ENGAGEMENTS**

The full and transparent disclosure of your international engagements is critical, especially as it relates to: (i) participation in a foreign government talent recruitment program, (ii) holding an appointment or affiliation with a foreign entity/institution, and (iii) receiving resources from a foreign entity that support or are related to any of your research endeavors.

1. Please answer each of the following questions:
   a. Do you participate in a foreign/international talent recruitment program?

      ○ Yes   ○ No

   b. Do you have an appointment, affiliation, or other relationship outside the U-M with a foreign entity/institution?

      ○ Yes   ○ No

   c. Has a foreign entity provided to you any **monetary** resources that support or are related to your research endeavors (with the exception of grants, contracts, or gifts awarded/given to U-M)?

      ○ Yes   ○ No

   d. Has a foreign entity provided to you any **non-monetary** resources (e.g., equipment, materials, personnel) that support or are related to your research endeavors?

      ○ Yes   ○ No

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<If the answer to Q2 d is "yes", conditionally display:>

Please provide the name of the entity providing the non-monetary resource (2.d. above) and a brief description of the resource:

Select the country where the entity is located

Add Country set

If required by the sponsor, include in Current and Pending / Other Support documentation any non-monetary resources (foreign or domestic) related to your research (not just this specific project.)

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**PAF Investigator Signature**

**ATTESTATION**

By selecting Sign PAF and clicking OK, the undersigned, to the best of their knowledge and belief:

- Certifies that all statements and information submitted to the sponsor (including all Current and Pending / Other Support) are true, complete, and accurate.
- Understands that any false, fictitious, or fraudulent statement or claims may subject him/her to criminal, civil, or administrative penalties.
- Certifies that any funded activities that may result from this request shall not overlap with activities funded by another sponsor unless expressly permitted.
- Certifies the proposed work is consistent with U-M unit objectives.
- Certifies that no Federal appropriated funds have been or will be paid to influence or attempt to influence the granting of this award.
- Accepts the obligations and commitments described in the proposal and in any resulting award, including:
    - Responsibility for the scientific or programmatic conduct of the project and submission of all required reports.
    - Performance of the work in accordance with U-M and sponsor policies, such as maintaining safe practices for the conduct of the project, reporting safety incidents, using properly commissioned lab space (if applicable), and properly disposing of or removing hazardous materials or equipment (if applicable).
    - Prompt disclosure of intellectual property and related information pursuant to the official policies of U-M and/or the sponsor (e.g., the federal Bayh-Dole Act).
- Certifies that the information in the above is true, complete, and accurate and will be updated with U-M and properly disclosed to the sponsor when required.

**Sign PAF:** ⊙

OK          Cancel

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# System-Generated Notifications

- System-generated emails to "delinquent" investigators.

- Sent 1, 10, 20, and 25 days after proposal submission.

- All messages will cc the PI and PAF Primary Research Administrator.

- 20- and 25-day messages will also cc Department and Unit-level Research Administrators.

- Messages include new paf.sign.questions@umich.edu address for additional help.

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# "Other Support" Review Pilot

- ORSP and COI will review M-Inform and "Other Support" (or similar)

  - "Yes" to any International Engagement question

    AND

  - Federally funded

- At PAF stage (including JIT), select ORSP Other Support Staff (OOSS) will review "Other Support."

  - Tracey Larkin, Daniela Marchelletta, David Mulder

- If Sponsor Documentation is missing or incomplete, ORSP will work with Project Team to update.

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# "Other Support" Review Pilot (cont.)

- Award (AWD) creation stage:

  - New "Ancillary Review" requirement in Compliance Status box:

    - "Yes" to any International Engagement question

      AND

    - Federally funded

  - Label = "Other Support Review"

Example:

**Compliance Status**

IRB Approval

COI Personnel Approval

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# "Other Support" Review Pilot (cont.)

- COI Staff congruency review across:
  - "Sign PAF" International Engagement questions
  - M-Inform disclosure
  - Sponsor documentation (e.g., NIH Other Support)

- If further evaluation of Sponsor Documentation is required, COI Staff contact ORSP Other Support Staff (OOSS).

- ORSP Staff work with Project Team to update Sponsor Documentation as needed.
  - ORSP staff mark "Other Support Review" as complete
  - "Traffic light" changes to green

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# "Other Support" Review Pilot (cont.)

- Investigators added at Award Set-Up will be required to complete "Sign Award Record" activity
  - Same components and information as "Sign PAF"

- Post-Award Change Request (PACR) form being updated to include collection of a new investigator's info for "Sign PAF/Award" data.

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# Data Conversion & In-Progress Submissions

PAF Investigator Signature → Proposal Submission → Award Set-Up

- PAFs (and CTRFs) that have been Routed for Approval (i.e., no longer in "Proposal Preparation") *and* that already have all applicable U-M Principal Investigator signatures in place will follow the old signature rule

- Revised PAFs will no longer require PI signature
  - Including PAFs under revision as of 09/14/2020

- Restored PAFs will require all Investigators to sign (or re-sign)

- All AWDs will follow the signature rule applied to its originating PAF

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# Communications & Change Management

| PAF Investigator Signature | Proposal Submission | Award Set-Up |

- First RAPid released 08/05/2020

- First targeted faculty email (from Mike Imperiale and Craig Reynolds) released 08/13/2020

- Additional details (e.g., data conversion, submissions in-progress) included in RAPid and targeted faculty email next week

- Additional messaging on websites, school/college newsletters, etc.

- Existing Job Aids, Training, etc. being updated to reflect changes

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# How You Can Help

PAF Investigator Signature → Proposal Submission → Award Set-Up

- Questions or Concerns:

    - Email [paf.sign.questions@umich.edu](mailto:paf.sign.questions@umich.edu)

    - Questions will be used to build out the webpage info and FAQ

    - May also factor into future system enhancements

- Spread the Word!

    - Especially regarding "Current M-Inform Disclosure" requirement!

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