

Pat Fitzgerald  
RAS Friday  
September 20, 2019

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**FAS/SEAS  
Grant Compliance  
Working Group Update**



## Dean Claudine Gay's Charge to the Working Group

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- “Provide us with an evaluation of the FAS procedures surrounding pre-award and post-award compliance with evolving federal funding agency expectations.”
- The scope to include:
  - Ways in which we solicit, assemble, and assess pertinent information from PIs
  - Identify how information is tracked and accessed at the departmental, school, and central administration levels
- Working Group to present findings and recommendations to include administration and procedural changes we can implement to further strengthen Harvard's performance in this area



## Working Group Members

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- Christopher Stubbs, Dean of Science (Chair)
- Sarah Axelrod, Assistant Vice President, Office for Sponsored Programs
- Frank Doyle, Dean of SEAS
- Patrick Fitzgerald, Associate Dean for Research Administration, FAS SEAS
- Zoe Fonseca-Kelly, Assistant Dean for Science
- Diane Lopez, Deputy General Counsel
- Russ Porter, Administrative Dean for Science
- Ara Tahmassian, University Chief Research Compliance Officer



## Progress to Date

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- **April 30**: Working Group Findings and Recommendations submitted to Dean Gay on
- **June 20**: Working Group and Sponsors (L. Kirwan, R. McCullough, T. Hollister) met with Dean Gay
  - Dean Gay endorses the Working Group's Recommendations
  - Designates Working Group to be permanent standing committee
- **October 2**: Working Group will reconvene

## Finding

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The reporting structure for departmental grant administrators within FAS runs through the Departmental administrators to the divisional administrative dean. Within SEAS these individuals report through a management chain to the head of FAS Research Administration Services.



## Recommendation

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Assess the pre-award and post-award support structures within FAS and SEAS, and their relationship to central administration units, and ascertain whether we are optimally configured to meet our goals. This will include a thorough review of the roles and responsibilities for organizational units as well as individual positions. We suggest that an external consultant be hired to assist with this work.



# Organizational Assessment Project

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- **Project Co-Leaders**
  - Sarah Axelrod, Assistant Vice President, OSP
  - Pat Fitzgerald, Associate Dean, FAS/SEAS
- **Project Sponsors**
  - Tom Hollister, Vice-President for Finance
  - Leslie Kirwan, FAS Dean for Administration and Finance

## Organizational Assessment Project Objective

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The objective of this Project is to assess the pre-award and post award support structures for FAS and SEAS and ascertain whether we are optimally configured to meet our goals of minimizing compliance risk and delivering a high level of service to faculty. This will include a thorough review of the roles and responsibilities for organizational units and potentially for individual positions.

## Organizational Assessment Project Objective

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The review will assess the research administration responsibilities of RAS, the FAS and SEAS departmental staff, and OSP. The review will include a comparison of the responsibilities of each group in order to identify any duplication or gaps in services provided. Is the current division of responsibilities optimal for efficient and effective support of the research at the 2 schools with an emphasis on compliance? Additionally, is there overlap or redundancy or, alternatively, are there necessary responsibilities that are not specifically assigned to a group or position?



## Request for Proposal (RFP)

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- RFP Sent to four firms: Huron, Deloitte, Baker Tilly, Accenture (withdrew)
- Responses requested no later than September 25<sup>th</sup>
- Project to commence in mid-October: Limited scope engagement to be completed quickly
- You may be asked to participate—your input is highly valued and we appreciate your help with this important project



# **FAS & SEAS Update for Faculty and Principal Investigators**

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Katie Droney  
RAS Friday  
September 20, 2019

## A Message from Dean Gay

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Dear FAS and SEAS Faculty and Principal Investigators,

Federal scrutiny of faculty outside activities and other compliance requirements has increased substantially in recent months. There are significant risks to Harvard and to faculty and others who serve as Principal Investigator (PI) on federal awards for failure to follow the requirements that accompany funding. As PI on a federal award, it is imperative that you comply with these requirements and that you understand the substantial risks of noncompliance.

Because of the need for PIs to be aware of and vigilant in enforcing grant terms on federal projects, the FAS and SEAS have developed the following compliance update to keep you informed on the latest federal requirements.

We appreciate your cooperation with this request. If you have any questions related to the information presented in the slides, we encourage you to reach out to your local grants administrator who can answer your questions or refer you to the appropriate administrative contact in FAS or SEAS.

Sincerely,

Claudine Gay

Edgerley Family Dean of the Faculty of Arts and Sciences

Wilbur A. Cowett Professor of Government and of African and African-American Studies



## The Three Topics Presented

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1. External professional engagements and disclosure requirements for Faculty and Principal Investigators on federally sponsored awards.
2. Effort commitment in grant proposals, effort tracking, and certification.
3. Expectations for workplace interactions.



Faculty of Arts and Sciences

RESEARCH ADMINISTRATION SERVICES



# **External Professional Engagements & Disclosure Requirements for Faculty and Principal Investigators on Federally Sponsored Awards**





## Disclosure Requirements

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This section reviews:

1. What a faculty must disclose to Harvard using the Faculty Activity Report (FAR) and Financial Conflict of Interest form (fCOI).
2. What a PI must disclose to the federal government in grant applications and on their Financial Conflict of Interest form (fCOI).
3. Why disclosure matters.



THE UNITED STATES  
DEPARTMENT *of* JUSTICE

Press Release: August 21, 2019

## **University of Kansas Researcher Indicted for Fraud for Failing to Disclose Conflict of Interest with Chinese University**

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A researcher at the University of Kansas (KU) was indicted today on federal charges of hiding the fact he was working full time for a Chinese university while doing research at KU funded by the U.S. government.

“Tao is alleged to have defrauded the U.S. government by unlawfully receiving federal grant money at the same time that he was employed and paid by a Chinese research university — a fact that he hid from his university and federal agencies,” said Assistant Attorney General Demers for National Security. “Any potential conflicts of commitment by a researcher must be disclosed as required by law and university policies. The Department will continue to pursue any unlawful failure to do so.”



# **Effort Commitment in Grant Proposals, Effort Tracking, and Certification**





## Faculty and PI Effort

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1. Harvard cannot accept an award if the effort commitment made in a funded proposal will result in the PI exceeding their research effort capacity. **PIs should work with their grant administrator during proposal preparation to mitigate the risk of potential overcommitments.**
  
2. PIs are responsible for ensuring that federal funds are used appropriately in accordance with the grant terms and conditions and Harvard policies. At the end of each quarter, they make a legal attestation of accuracy that student, postdoc, and staff salaries charged to their grant are commensurate with the actual effort expended on the project. **This is their role as PI on the award.**



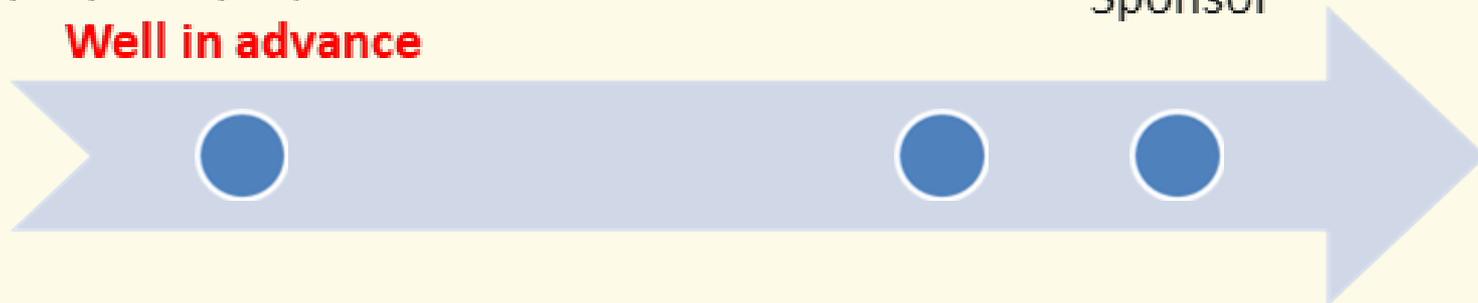
# Proposal Preparation and Submission

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PI begins working with grant administrator on proposal preparation

**Well in advance**

Submission to Sponsor



Proposal is released by PI to OSP

**5 business days**  
before sponsor's due date



# Expectations for Workplace Interactions



## Workplace Collegiality

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“Establishing a respectful workplace culture does not mean that we forgo high standards, academic rigor, posing intellectual challenges, or asking for justifications of assertions. But these interactions must occur without personal attacks or belittling.

We ask that you pay particular attention to this workplace culture issue in your mentoring of junior colleagues and postdocs, and in your interactions with staff.

The National Science Foundation now requires that Harvard report any instances of a PI or co-Investigator being found in violation of University harassment policies and the National Institutes of Health (NIH) is implementing a similar requirement.”

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Christopher Stubbs  
Professor of Physics and Astronomy  
Dean of Science

Faculty of Arts and Sciences

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# Action Items for Faculty and Principal Investigators





## Action Items

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### **Work in partnership with your department grant administrator to:**

- Make sure that all relevant disclosures have been made and that they are up-to-date and accurate.
- Track the research effort within your group, including your own, and certify quarterly and annually, as needed.
- Review grant expenditures monthly.
- Comply with Harvard policies and grant terms.
- Ensure your Other Support/Current and Pending Support is accurate and up-to-date.

### **In addition, you should:**

- Work with your external program officer to ensure that you comply with all expectations for your funding agency .
- Establish clear departmental expectations for collegial conduct.
- Speak up if you witness instances where individuals fail to meet our shared expectations.



Estimated Launch Date:  
**September 30, 2019**

Estimated Deadline for  
Completion:  
**November 1, 2019**

**After November 1st, PIs will be prohibited from submitting grant applications and/or receiving new awards until they complete the update.**