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CITI Training- What You Need to Know!

What is the first thing that pops into your mind when you hear about "CITI training?" Do you think that this refers to one type of training, such as a way to meet the Institutional Review Board (IRB) training requirements or do nothing but question marks appear in your mind's eye? Whether you know nothing about CITI or you have an existing CITI account and user history, this article will hopefully dispel some of the confusion that seems to surround this training platform and introduce you to a few new opportunities that you may not have been aware of.

What is CITI?

[The Collaborative Institutional Training Initiative](#) (CITI) program is, in fact, not a kind of training; instead, it is a leading provider of research education content, offering web-based training materials that are used by thousands of subscribing academic institutions, government agencies, and commercial organizations within the U.S. and globally as a way to train their researchers. Initially founded in 2011, CITI has continued to develop its training content and recently joined the Biomedical Research Alliance of New York (BRANY) in May of 2016 in effort to better address the educational needs of the research community.

How does Northwestern use CITI?

As a CITI subscriber, Northwestern University has decided to utilize a number of different courses from the large course catalog, customized to the needs of our various types of learners. CITI courses are used to fulfill a number of institutional and federal training requirements and some courses are added as supplemental resource material to in-person trainings.

What CITI courses are required?

Individuals involved in research at Northwestern may be required to take various CITI courses at different times depending on the scope of work being conducted. When selecting courses from the online CITI curriculum, learners are provided a series of enrollment questions and the responses help identify what courses need to be completed. The learner need only choose coursework that applies to their specific research requirements at that time, but has access to coursework in Human Subjects Research, Good Clinical Practice, Responsible Conduct of Research, and Export Controls Compliance.

IRB training

The [IRB office](#) uses CITI coursework to meet federal human subject protections training requirements. Individuals involved in research with human participants must complete appropriate training and recertify every three years, otherwise the researcher's ability to conduct work on an IRB protocol is withheld. There are two basic human subject protections courses in CITI, one in biomedical research and one in social science and behavioral science research, which satisfy the initial IRB training requirement. The CITI refresher course is automatically added to the learner's training plan in CITI once the three year deadline approaches.

Good Clinical Practice training

The Good Clinical Practice (GCP) course in CITI can be used to meet the [GCP training requirements](#) as defined by the Northwestern University and the Feinberg School of Medicine. Applicable to all investigators, co-investigators and study personnel listed on Northwestern University IRB applications and involved in clinical trials, initial GCP training must be completed by January 1, 2017, with recertification following every three years.

Responsible Conduct of Research training

The Responsible Conduct of Research (RCR) courses in CITI, which are managed by the Office for Research Integrity (ORI), are used to meet National Science Foundation (NSF) [RCR training requirements](#). Undergraduate students need only complete the online CITI RCR course for undergraduate students, whereas graduate students and postdoctoral researchers may be required to complete one of the other school-specific CITI courses as a supplement to an instructor-led RCR training course.

Export Controls Compliance training

The [Office for Export Controls Compliance \(OECC\)](#) has added a number of CITI courses which will be useful tools to help strengthen Northwestern's export compliance program. According to OECC's director, Lane Campbell, "Universities are particularly susceptible to export compliance risk given the cutting edge research being conducted on campuses and the prevalence of foreign national students, which trigger 'deemed export' concerns. Universities are expected to be vigilant, to stay abreast of, and to comply with, the ever-evolving regulatory framework." The export compliance basic course in CITI touches upon all areas of export compliance that are important for the University community to understand, whereas the other course modules offer a more detailed focus on particular issues, such as biosafety, compliance for researchers, collaborations, etc. OECC is currently working to match these additional courses to the appropriate roles/offices across the University, so stay tuned for more information about how this training component will be utilized moving forward.

Whether you are looking to take supplemental training to further enhance your own professional growth, or are needing to take specific coursework in order to comply with institutional or federal training requirements, the web-based materials in CITI make learning more accessible. If you still find the CITI coursework options confusing, don't hesitate to reach out to [Beth Irwin](#), ORI's research training manager, to discuss your training options!

QUOTE CORNER

"Ethics is knowing the difference between what you have a right to do and what is right to do."

-Potter Stewart

F&A Rates In Sponsored Research

The facilities and administrative (F&A) rate is an incredibly important component of a sponsored project budget, but it is often a challenging concept for administrators to concisely explain. Budgets generally include two cost categories, direct costs that can be explicitly assigned to an individual project, and indirect costs, also referred to as F&A, which go towards common expenses that cannot be specifically assigned to any one sponsored project. For example, direct costs may include project staff salaries, equipment, materials/supplies, travel, and subcontracts; whereas F&A costs factor in things such as building/equipment depreciation, utilities, operations and maintenance, administrative salaries, and general office supplies.

"Another way to think of F&A," explains Jennifer Mitchell, Associate Executive Director for Research Financial Operations, "is the overhead costs that are incurred to help faculty do sponsored research. For instance, if you run a lab then there is electricity, water, and gas that is used to run the lab. You also want to be able to pay administrators for the time spent preparing proposals, invoicing, and working with payroll."

Though Northwestern applies different F&A rates depending on the type of a sponsored project, the most commonly used F&A rates are negotiated between Northwestern and the federal government, specifically the Cost Allocation Services (CAS) in the Department of Health and Human Services (DHHS). This negotiation process occurs on a 3 to 4 year cycle and starts when Northwestern's Office of Cost Studies begins the lengthy preparation of the proposal that is submitted to CAS, the most recent of which was submitted in February 2015.

Preparation includes collecting information from the base year (the fiscal year the expenditures are analyzed for calculation) to determine the University's applicable costs for administration, building/equipment depreciation, interests, operations and maintenance (such as utilities and janitorial service), and libraries. The proposed F&A rate, in a nutshell, is then identified by taking the total sum of these indirect costs that relate to organized research, removing exclusions and unallowable costs, and dividing it by the total sum of direct costs of organized research.

Following the initial proposal submission, CAS will request additional supporting documentation and details before the final rates are negotiated and agreed upon. The CAS staff also visit Northwestern to verify the lab space and equipment inventory results. The rates ultimately result in the indirect cost recovery Northwestern is paid by the federal government in addition to the direct costs on the awards.

As Mitchell explains, "per Uniform Guidance, institutions with federal direct cost of work exceeding \$10 million in a fiscal year may prepare an F&A long-form proposal and Northwestern has chosen to do so to maximize the calculation." However, it's important to know that the final negotiated rate is not always what the University initially calculated and proposed. "The University felt a higher rate (such as a rate close to our calculated number) was fair and was needed to reimburse our indirect costs, but CAS traditionally engaged in negotiating and granting lower rates, which explains the gradual increase in the sponsored research rate from 55.5% for FY16, 56.5% for FY17, to 58% for FY18 and beyond."

When calculating the F&A rates, there are many factors contributing to the increase or decrease of the calculated rates that are helpful to understand. For instance, new building or equipment investments would increase the F&A rates, since these are costs allocated in the numerator of the calculation. Whereas items such as cost sharing can lower the rate, since it is factored into the denominator. Additionally, departments have a large role in helping the University calculate the rate through their participation in the annual space survey, which is the main driver in determining the facility costs associated with sponsored research. This survey is used to help determine the functions of a lab. For instance, if a lab is mostly devoted to sponsored research rather than instruction, then a larger part of the space will be coded as sponsored research. The functional coding of a room is important to consider and there are a number of trainings offered to help administrators determine how best to code space appropriately. Equipment inventory is another important exercise, as the result is also used in the numerator for calculation. When CAS walked the research labs in August of 2015, they validated the equipment tags in the labs.

FY17 is Northwestern's next F&A base year. "The department's participation in accurately reporting the space survey, equipment inventory, and effort reporting (for cost share calculation) are crucial for the success of our F&A proposal and the effort is greatly appreciated," explains Mitchell.

Staying informed about which F&A rates are applicable to sponsored projects is essential for administrators, especially those who work with budgets, and more detailed information can be found on the Office for Sponsored Research's [F&A Rates](#) page. Additionally, administrators who wish to better understand how to code space can find [helpful space survey guides](#) on the Office of Cost Studies home page.

Did You Know?

The IRB Office now publishes real time [metrics](#) on their website that provide detailed information about turn-around-time (TAT) to gauge the time it takes from submission to final determination.

The Office for Research provided [guidance](#) pertaining to the new Overtime Rule from the US Department of Labor that will require several changes at Northwestern. Notably, from 12/1/2016 and onward, all post-doctoral fellows will need to be categorized as exempt, full-time employees, earning an annualized salary of at least \$47,476. Stay tuned for further guidance regarding this rule.

Northwestern is required to ensure Responsible Conduct of Research (RCR) training is successfully completed for NSF supported undergraduate students, graduate students, and post-doctoral fellows as well as all trainees, participants, and scholars supported through applicable NIH awards. Visit ORI's [training page](#) for more detailed information about these federal requirements.

Introducing Jennifer Mitchell



1. What is your title at Northwestern?

Associate Executive Director of Research Financial Operations

2. What does that mean?

In addition to managing the Office of Cost Studies, I am coordinating training and reviewing policies and procedures for ASRSP. I am also managing the ASRSP Evanston Grant & Contract Financial Administrators (GCFAs).

3. What is one thing you want people to know about what you do here?

Compliance through excellent customer service

4. How long have you been at Northwestern?

I came here in February 2008. When I first came here, I focused on effort reporting and then transitioned in 2009 to also manage F&A and recharge operations (added to my portfolio).

5. What did you do before you came to Northwestern?

I was a consultant at a consulting firm that also served higher education clients. I implemented systems and provided reviews at places such as Johns Hopkins, Yale University, University of Pennsylvania and Northwestern University.

6. Where is your home town?

I was born in Taiwan and came to Chicago for education.

7. What is your favorite ice cream flavor?

Strawberry

8. What is your favorite thing to do outside of work?

Playing with my dog and meeting people at the beach or the park.

9. What Chicago event are you most looking forward to experiencing?

My husband and I like to visit the ravines and beach near Fort Sheridan. It's less known and not crowded.

Research Administration Training Seminar

This four-session seminar is geared toward research administrators, staff involved in research administration, and anyone who wants to learn about Northwestern's research administration process, policies, and procedures. The seminar serves as an introduction to Northwestern's research enterprise and the extensive systems involved. It is a great networking and educational opportunity for staff new to research or experienced staff who would like a refresher in certain areas. Representatives from offices throughout Northwestern will be on hand to present and answer questions.



The next seminar will take place October 4th, 6th, 11th and 13th on the Evanston campus from 9:00am-12:30pm, in Chambers Hall.

Registration can now be completed through Northwestern University's new training management system, Learn@Northwestern. Simply [log-in](#) using your NetID and password, then use the search tool in the top right-hand corner to find the Research Administration Training Seminar class. When you select "enroll," you will be registered for all four days of the seminar. If you experience difficulties registering or have any questions, please email bethirwin@northwestern.edu for support.

Columbia University's Cautionary Example

If there was ever a doubt of the importance of understanding and correctly managing Facilities and Administrative (F&A) costs, Columbia University's recent \$9.5 million settlement to resolve fraudulent charges clearly demonstrates how important it truly is. According to a Department of Justice press release from July 14, 2016, a U.S. court judge approved the settlement stipulation which required both the monetary restitution to the United States as well as Columbia admitting that, from July 1, 2003 through June 30, 2015, it incorrectly applied on-campus indirect cost rates to 423 NIH grants, despite the fact that research was primarily performed in space not owned or operated by the University.¹

Universities receive reimbursement only for actual costs that are applied to the federal award, including both direct costs and indirect costs. Whereas the direct costs are specifically applicable to the award, indirect costs are calculated by applying specified F&A rates for the project. Different F&A rates are negotiated between an institution and the federal government for research that is performed primarily on-campus versus off-campus, with the off-campus rate typically being almost half the on-campus rate. Since Columbia has a collaborative relationship with the New York State Psychiatric Institute (NYSPI), faculty often perform research in two off-campus buildings that are operated by NYSPI and owned by the State of New York. In addition, faculty perform research in another off-campus building owned by the City of New York. During the time in question, Columbia received NIH funding for grants where research primarily took place in these off-campus locations, yet Columbia applied the on-campus rate when seeking F&A reimbursements from NIH. Columbia also failed to disclose in the NIH grant applications that the buildings where research was primarily performed were not owned/operated by the University.¹

Settlements at other universities serve as cautionary reminders to institutions, and in this case most notably those with faculty members who may perform research in buildings not owned or operated by the university. At Northwestern, research administrators play a key role in drafting and reviewing budgets. During that process, it is important to keep in mind where the research will be performed and whether the on- or off-campus rate should be applied based on that location. Northwestern's [Office of Cost Studies' website](#) offers more information about F&A rates and the Cost Studies' staff are excellent resources should questions arise.

¹[Department of Justice U.S. Attorney's Office Southern District of New York. \(2016, July 14\). Manhattan U.S. attorney announces \\$9.5 million settlement with Columbia University for improperly seeking excessive cost recoveries in connection with federal research grants.](#)



EthicsPoint is a third party vendor that allows you to confidentially raise ethical concerns, ask questions, and/or report activities that may involve misconduct or violations of Northwestern University policy.

[For more information visit the website here.](#)

ORI MISSION

Identifying compliance risks in our research practices and communicating those risks to the research community;

Partnering with the research community in innovative and effective ways to minimize and manage research risks;

Educating the research community with respect to appropriate business practices related to the conduct of research at Northwestern University; and

Monitoring and correcting non-compliance in accordance with University and federal guidelines.

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