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How A-81 Will “Launch” Us...



Duke University

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Research Administration at Duke University

- Decentralized research support structure, with much of the core responsibility for performance and oversight vested in PIs and Grant Managers/Business Manager at the unit level; Estimated Audience Impact:
 - Grant Managers: 1,000-1,200
 - Business Managers & Department Administrators: 350
 - Principal Investigator: 2,500
 - Two pre-award offices serving campus and SOM; one post-award office; 5 schools with varied level of research funding and research administration
 - Training/Education coordinated by Research Costing Compliance, which also provides financial compliance monitoring 
 - Research administration leadership is provided by a joint committee of senior leaders - RACI – Research Administration Continuous Improvement 
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Challenges and Prioritization

- Challenges
 - Training, Education & Communication
 - Business Process Transformation
 - Monitoring
 - Competing Priorities
 - Opportunity Cost:
 - eRA@Duke – 3 Year Initiative with 5 work streams to electronically streamline NOA through Close-out
 - NIH Regulatory Changes - SubAcct / 90 Day Transition
 - HR RACI Rollout and Certification Restructure
 - Ongoing Operations in departments and central offices 
 - Interference with department business cycles (budget, year-end, EPIC Implementation)
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IT and Business Process Implications?

- Computers: non-capital computers can be direct charged if allocable; does not need to be “solely dedicated”
- Travel Cost: Temporary dependent care costs – allowable but must be consistent & only for the time period of travel, etc.
- Compensation – Personal Services
- MTDC Exclusions
- Direct Charge of Admin and Clerical Personnel: Removed “Major Project” and “greater than routine level” but retained “explicitly included in the budget
- .502(c)(4) – Agencies shall require recipients to relate financial data to performance accomplishments whenever practical.
- .501 – New guidance on Subrecipient Monitoring and Management: A-133 threshold increase from \$500k to \$750k

Will agencies have separate guidance?

Is this a benefit we are going to offer? Cost?

Ability to account for in Ledger and F&A Study?

Impact on eRA@Duke Rollout?

Do we need new controls around this?

What are the IT and resource implications?



The Unknowns

- Will the Feds provide:
 - Clarity in timeline?
 - Flexibility in timeline?
 - Crosswalks and FAQs?
- How will A-133(?) Compliance Supplement be impacted?
- Might some agencies interpret aspects of A-81 differently – how will this be resolved?
- How will various OIG workplans be impacted?
- Alignment of Agencies, Universities, & OIGs

How Will We Deal with a Continuous Trickle of Interpretation and Clarification



“The Plan”

- Develop a Plan with RACI Leadership (weekly meetings)
 - VP of HR and Finance
 - Management Center Leadership
 - Central Office Reps
 - Vice Dean and Provost of Research
 - Analyze business process impact; consider IT options to mitigate
 - Reprioritize Ongoing Initiatives – what are we going to stop doing and what is the organizational impact?
 - Training and Education
 - Incorporate into Mandatory Training Programs (Faculty, Business & Grant Managers)
 - Incorporate into Certification Programs
 - Develop monitoring strategies for enforcement (RCC, IA, SOMCO)
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