

Meeting Objectives

The Office of Research is undertaking a review of the way we perform the business of research at UF. The ultimate goal is to outline processes that most efficiently and compliantly route proposals and related documents, collect information, present information to stakeholders who must provide approval, and allow for tracking and reporting. With these improvements, we hope to provide space for our faculty to devote more time to their research and other sponsored activity and less time to chasing forms and paperwork.

Peer Institution Reviews

The group discussed the three products reviewed by the group including ARGIS (UCF), WISPER (Wisconsin), and Click Commerce (Michigan). Generally, ARGIS was not well received amongst the group who thought that its interface and data-heavy nature seemed cumbersome and unattractive. A more simple and streamlined interface was desired by the group. The data necessary for award set up appeared to be a strength of the tool, but the process related to routing the information at proposal stage was not well received.

Several team members liked the WISPER product due to its familiarity since it is built on PeopleSoft architecture. Others thought that the PeopleSoft look and feel would be a negative to many across campus and we should take this opportunity to move away from the generally unfriendly user interface. There were interesting decisions made at Wisconsin regarding the dynamic approval process, not mandating a Chair signature for any proposal. The flexible determination of approvals other than the award PI and the associated Dean was flexible. That the system was more holistic including collection of information from proposal through award set up was well received.

Click Commerce was well received due to its simple look and feel and its familiarity to faculty as our current IRB system is built on Click technology. Additionally, the dynamic and customizable interface and workflow would grant us many options in defining a process that works best for UF. The help text provided for each question was perceived as a strong benefit.

Kuali Coeus was mentioned by the group. Although this product was not reviewed, it was mentioned that it is widely used in the industry and has many features that UF would be looking for in a final solution. A demonstration of this tool might be scheduled in the coming weeks.

Limited Opportunity Solicitations and Internal Proposal Competitions

These two processes are similar in that UF reviews proposals for merit before either forwarding for sponsor review or for UF award determination. However, due to the variations in workflow requirements, the processes need to be mapped separately. Additionally the process for handing these selections off to either full proposal submission or award set up can be streamlined if captured in the same system that all external applications uses. Some general needs for these functions are:

- 1) Flexibility in the internal competition process for the awarding entity to determine routing, approvals, and required elements
- 2) Tracking so we know who has been awarded funds for these different opportunities and true

credit is given

- 3) Tracking so that we are ensured only selected proposals in limited solicitations are submitted to the sponsor
- 4) Appropriate security during the application process so PI's do not know with whom else they are competing

Proposal Development

The proposal development discussion centered on the process for building proposals and the necessary elements required to build a proposal. Generally, the group agreed that a software application with System-to-System (S2S) capability integrated into the workflow of the proposal routing and submission would be extremely beneficial. Nearly 40% of UF's proposal submissions are federal so to have a system with S2S capability would create great efficiencies in the proposal application and submission process.

The group also discussed budget as a key component for many proposals and UF administrators are currently building budgets in several ways including by spreadsheet, in PeopleSoft, or in Cayuse. Generally a central budget tool would be most useful if it could then be exported to Excel and also had spreadsheet upload capability. This would also facilitate the review process as calculation errors would be greatly reduced. Administrative review can then focus on the content of the budget and not the math. In addition, cross-departmental budgets are a challenge as each user has their own tool which they prefer the supporting units use.

In addition, the budget submitted for the majority of federal programs is not the budget awarded. An easy tool to facilitate revision of the proposed budget would be greatly utilized. The reduction in duplication and the existence of this budget within the tool could facilitate the award set up process as well.

The group discussed requirements for resources sections in many proposals and how it would be useful if PIs and staff had a central location they could use to gather pre-formatted resource descriptions for our commonly centers and facilities (such as CTSL, ICBR, or HiPerGator). The centers often have mission statements but those mission statements are usually in a format that is different than what is required for a resource section of a proposal application. Centralizing a collection of UF resources in a format appropriate for proposal submissions would be beneficial to administrators and PIs in proposal development. This listing could also serve as a way to promote each facility's availability, increasing the ability of campus to leverage these facilities on more projects.

Lay summaries, abstracts, scope of work, and publications are desired to be available in the tool. Many potential uses of this information have been identified, including identification of reviewers for internal competitions and limited opportunities, identification of experts within particular discipline for large campus initiatives, providing the information to development officers and local press or publication units, and support in developing some form pages including biosketches. The group believes there are likely more opportunities available with this information.

Other key elements discussed during proposal development included (unlikely to be substantially leveraged in a central tool):

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|---|--|
| 1) Scope of Work | 6) Letters of Support |
| 2) Research Plan | 7) Subcontract information (if applicable) |
| 3) Budget Justification | 8) Multi-PI Plan (if applicable) |
| 4) PI biosketch (possibility to leverage system's data in building these) | 9) Postdoc information for training grants |
| 5) IRB/IACUC (and other certifications) | 10) *Clinical Trials require unique forms |

Proposal Routing – Current state

The group discussed the current state of routing and approvals and this is an area for significant improvement in this process. The general outcome of the discussion was that many approvers are signing, not because they have performed a detailed review of the proposal and its content, but simply because the current process mandates it. Many of the well supported units rely on their department administrators to flag any departmental policies or resource commitments, then seek approval from the Chair or Dean only when those elements are present. The group suggested that the Chairs and Deans are largely interested only when Cost Sharing (including reduced F&A rate) is included and effort commitments are high or low. Other noted that many times, approvers are likely more interested in notification of the research intentions rather than approval.

The group reviewed many questions such as:

- 1) What approvals are necessary and when?
- 2) Are we duplicating effort by having so many people review the same items?
- 3) What are the key items that chairs and Deans are really interested in reviewing?

The group agreed that signatures and routing are not being signed and routed for the right reasons. Presenting only what people care about at given times will free up time for full reviews when necessary. Additionally, creating a fast track for proposal routing is an idea that would be beneficial. For items that are basic and routine (e.g. NIH Modular Grant without any cost sharing proposed), a less extensive review is likely necessary than for a more complex submission (e.g. Dept of Defense contract). The group also discussed an option for less review at submission time and potentially another review at award time when re-budgeting is required and more information is available. Given current success ratios for many programs, this would reduce the need to provide a detailed review of the administrative portions of the application only when the scientific portion was deemed successful. The group identified a risk in this process, whereby UF might be committing resources that will have to be provided if funded. A proper budget development tool integrated into the routing process might facilitate identification of these items.

In addition, our institution can take better advantage of the dead time between a proposal application and the time of the award. There are many sponsors who provide some advance trigger that an award is likely. Using this time to expedite training, certifications, revised budgeting or the hiring processes would reduce the time from these award triggers to the time the project work can actually begin.

Other Discussions

Having strong local administrators is key to the proposal development and routing success. Given the proper tools and time, administrators are the most critical resource in developing quality administrative sections of a proposal. In turn, given the high volume of activity necessitating no review at deadline, these administrators are the only line of defense. Acknowledging that and leveraging their support in the way that is most effective can be one of the greatest efficiencies gained. In turn, this could help ensure success of the proposal being built according to agency guidelines.

Another key takeaway is the need for a central dashboard for both faculty and support staff that displays all relevant proposals and awards no matter what stage in the lifecycle. This would aid staff and PIs to be informed of key proposals and deadlines and to monitor the state of all proposals and awards.

Transparency can help everyone in the process understand what is expected of them and allow them to act at times that are most available to them. For example, if a faculty member knows that a proposal has been deemed “likely to be funded”, a list of items that will be needed before the project can begin can be made available. In addition, having a central document repository with drag and drop attachments would

be key to a successful tool. At the beginning of the lifecycle of the proposal it would be helpful to tag specific files for subaward scope and budget as well as other groupings that may be relevant. If these are loaded and tagged appropriately as they become available, this information can be used through all stages of the award lifecycle. Leveraging the knowledge of the status along with the necessary elements can provide better leveraging of limited time resources.

For faculty, a centralized place to track all of their training requirements would be useful and reduce some of the frustration that faculty currently has with the training process. The dashboard could also list certification requirements and information as well.

Proposal Routing

Fast Track Proposal Routing

The group further examined the idea of a fast track approval path which was initially identified during week one project meetings. By evaluating what items were being reviewed at each current approval step, the team tried to address the value added to the institution. Some steps may be able to be eliminated at proposal stage and reinserted prior to release of funds. Given the low federal success ratio, this would reduce the review on proposals that are low risk and will likely need to be revised prior to award.

The fast track approval discussion focused on identifying what attributes should qualify a proposal to become a fast-track candidate. At a high level, the group identified several types of proposals that have Cayuse-like system validations and controls or a very high likelihood of revised budget at the time of award. Some grant sponsors that generally fall into the category include the National Institutes of Health(NIH), National Science Foundation(NSF), United States Department of Agriculture National Institute of Food and Agriculture (USDA NIFA), National Aeronautics and Space Administration (NASA), American Heart Association (AHA), Florida Department of Agriculture and Consumer Services(FDACS), and many pre-proposals.

The requirements to keep a proposal in the fast track would include those:

- Developed using the **UFIRST** budgeting tool so the calculations for salary and F&A are valid
- With only a single, federally negotiated or program required F&A rate
- Faculty effort within certain tolerances
- No cost sharing
- No subcontracts unless they are identified on the FDP approved subcontractor list
- No construction, alterations or renovations (proposal can be completed with existing space)
- No terms & conditions to be accepted or responded to at time of submission
- Under a TBD dollar threshold
- Created in a “certified” department
- With only eligible faculty members (Eligible PI includes such requirements as: up to date on all required institutional training; without conflicts of interest; and in good standing with regards to effort reporting, cost transfers, project reports and deliverables, and compliance requirements.)
- Proposals where subcontracts make up a large percentage of the application or there are a large number of subcontracts.

One of the critical elements of the proposal is certified department administration. Before such a system could be implemented, a certification program whereby department administrative support can be

certified to submit on behalf of the institution. Such certification must be maintained through documented competency in developing appropriate proposals.

Proposals that meet fast track criteria would only require the signature of the PI and the Chair (Department) before being submitted by the department. Notifications will be sent to all other faculty included as key personnel and all included faculty's department and dean, to allow them to affirm or deny their involvement in the proposal. This change would eliminate Dean and DSP approvals and also shift submission responsibilities from DSP to department level.

Potential Risks to a Fast Track Process

With the potential introduction of a fast track for proposal routing, the group discussed potential risks to the institution were these changes to be implemented. Potential risks in the new process include:

- Delayed awards for additional budgetary and compliance review later in the process
- Complicated understanding of signature allowability
- Increased rejection without review
- Cost sharing oversights due to less thorough review
- Insufficient department staffing to handle the processing normally performed by DSP
- Investigators putting undue pressure on departmental staff to stay late to submit for deadlines after 5pm
- Change management

Full Review Proposal Routing

For proposals that do not meet the criteria for fast track routing, a more extensive review would be required. It was determined by the group that although many of the same items are reviewed at both the department level and the college level, these items are likely reviewed for different reasons in each respective office and therefore both reviews do provide value.

Faculty involved as key personnel and their respective chairs and deans would be notified as soon as they are included in the proposal. This would allow them the opportunity to affirm or deny involvement; however, lack of response would not halt the submission process.

Proposals needing a full review and approval would be routed to the following (in proposed order):

1. Cost share Chair
2. Cost Share Dean
3. Chair
4. PI
5. Dean
6. Chair submits*

*The full review process would normally culminate in a submission by the respective Chair's office with the Department able to establish an alternate submitting unit in cases of temporary staffing shortages, low submission volume or lack of certified departmental staff. DSP can be assigned as the alternate submitting unit for any department or college. The team feels that while there is value in the current DSP review, with increased training and improved budgeting tools, that review could successfully take place at the department and college level. With additional time gained from fewer reviews, DSP staff could redirect their time to absorb increased volume in contracting, increased training, and increased coordination of systems and programs.

Any proposal (including any modification including supplements or continuations) would go through the same decision factors stated above for review. Any contractual agreements will be routed on the full path through DSP.

Dashboards, notifications and security

The need for a dashboard to facilitate communication of action items to be completed and other informational items was identified. Such a dashboard would include:

- Action Items (Approvals, training, certifications, etc.)
- Information (Latest steps on each project in someone's portfolio such as submission occurred, negotiations ongoing, or accounts receivable activity and the person who can be contacted with any questions on each step)
- Reports (including success ratios, proposal submissions, peer benchmarks with anonymity for individual faculty)
- Profile Page (Update publications, biosketch, identification of preferred contact method (text or chat), delegate proxies, etc.)
- Help links

The preferred security model included:

- Faculty: If you are on a proposal, you can see all information within the proposal record
- Department staff and chairs: see all proposals owned by or with faculty from their unit included
- Deans staff and Deans: see all proposals owned by or with faculty from their unit included
- Core offices: see all records in the system

A few exceptions such as those with export controls, classified or sensitive information, or those where the dean or alternate unit has a personal conflict. The security model needs to be flexible enough to handle exceptions and restrict access.

Post proposal submission and pre-award time period

The current process at many agencies is to solicit additional information about particular proposals if they reach a higher potential for funding. Therefore, many items need to be routed for additional approval subsequent to the proposal. The institution would benefit from leveraging this knowledge to expedite funds release. It was identified that budget revisions which currently are submitted directly from the PI to DSP would benefit from additional review and approval. Other types of correspondence and negotiations occurring during this window can be started.

For budget revisions, the degree of the revision would determine the route of review. It does not matter what route it took in the proposal stage. Whoever becomes aware of the need for the revised budget should start it through the system dashboard. The system will determine which path based on the revisions that are entered into the UFIRST budgeting tool. As soon as the request for revised budget is logged into UFIRST, the record status will change; the chair/department will receive an action item to facilitate the development and submission of the revised budget.

Less than significant revisions (currently defined as less than a 10% cut from original proposed budget, no changes to key personnel or their effort commitment, no changes to cost sharing, no changes to the F&A base or rate, and no changes in the subcontractors), can follow the minimal revised budget route. The PI, Co-I, Chair, Dean, and DSP will have the opportunity to object. No response during this time period will indicate approval. Ultimately the chair is responsible for submitting the revised budget to the sponsor. After the budget is submitted to the sponsor, the record status will change again.

If changes to a budget are significant (all other than those currently defined as less than significant), then

all parties that are affected by the change (Cost Share Chair, Cost Share Dean, PI, Co-I, Co-I Chair, Co-I Dean, Chair, and Dean) must review and approve the budget revision. The chair is ultimately responsible for the submission. DSP will review, approve and submit if the department does not have the capability to do so. After the budget is submitted to the sponsor, the record status will change again.

Any institutional forms or certifications will be sent to DSP who will facilitate completion and coordinate responses needed from other units. DSP will be responsible for submission to the sponsor.

It is helpful to have all communications between anyone at UF (PI, department, Dean or DSP) tracked in UFIRST – whether these are simply preliminary conversations or formal correspondence. Once the actual agreement (other than Clinical Trial which goes to RAC) arrives, it should be immediately provided to DSP. All DSP communications in support of the negotiations should be transparent and any needs for internal response should be clearly communicated.

In order to assist with identifying items that have potential to delay award set up, a “checklist” based on the particular indicators of the award (i.e., industrial sponsored agreement would have an IP checklist, a project with human subjects would indicate IRB approval required, FCOI, IACUC, EHS, Germplasm, training) would be available on the project’s dashboard. This would provide some guidance so that any point the award is likely to be funded; everyone involved can initiate necessary sub-processes that can ultimately expedite set up. There is an assumption that this system provides integrated access to project and PI relevant information and links. For example, if the PI has disclosed financial conflicts, the system would provide transparent links or indicators so that all supporting the negotiation and set up would have this information at their disposal. Other examples include all IRB protocols and their status and all IACUC protocols and their status. Users should be able to link the data together rather than rekey the information into UFIRST.

In some cases export control review can start before an award or agreement arrives. The PI can answer project specific questions which are a large part of the review consideration. When the terms and conditions necessitate additional export review, additional questions may be required. This information wouldn’t be available until the final award or agreement arrived. A committee is currently convened to review the export control process and the results of that review should be included in the requirements for UFIRST.

There are likely other related activities that can be initiated as soon as the likelihood of award is very high. For example, if new employees are needed, a job description can be developed, job posted and applicants considered. The actual hiring could proceed only when the project is established.

Award Set up

Items needed (Collection)

The award construction can start at any time after the proposal is submitted. Items can be gathered and entered in to the system as they become available. DSP will be ultimately responsible for entering and validating information for an award; however it will go to the PI, department and dean where necessary for approval before funds are released.

Items needed before the award can be released include:

- All demographic and financial information in UFIRST matches the award
- Effort commitments
- IRB
- IACUC

- Export Control
- Conflict of Interest
- Biohazard/rDNA/Select Agents
- Germplasm
- Questions to facilitate proper IP disposition
- Training requirements met
- KK level
- Purpose
- Project Breakouts
- Restricted party screening
- Milestones and deliverables
 - UFIRST should leverage Sponsor profiles to automate the entry of some common deliverables and reporting needs
 - Payment (billing) plan and requirements
- Terms and conditions
 - Publication restrictions
 - Financial restrictions
 - Equipment title
 - Carryforward provisions
- Credit – all key personnel must approve
- Subcontract information

The conversation around why sub-projects are established was substantial. It seems that sub-projects are established for local accounting control, easier restrictions on the amount the sub-project can spend, for F&A return, and project credit. We hoped to separate the credit from the need from a sub-project by establishing that all key personnel must agree to a credit breakout for the award allocation, separate from the project breakout. Conversations with the University's fiscal officers to help them understand the current challenges of HR & FI transactions that cross departments is necessary. If those can be improved, we can potentially reduce some of the sub-project activity (which reduces the burden on the primary project during reporting, on C&G, and on DSP for set up).

F&A return will follow the project. The team recommended that no subprojects should be set up without the award appropriate F&A moving with the direct cost budget. In addition, rather than establishing F&A allocations at the time of set up, the PI, Chair & Dean of the project will receive their allocation. The only additional element is to allow a center to be declared between May 1 and August 1 each year where F&A is returned. If no center is declared, that portion of the return continues to be provided to the Dean.

Temps

The team recommends that the Deans, Chairs and the Office of Research discuss the risk associated with establishing temps and determine the most appropriate education, information, reporting needs, and risk assumption to best suit the University. Although administratively advantageous, many units represented by the team do not establish temps because they did not want to absorb the risk of the costs incurred. Under the assumption that temps will continue to exist in some form, UFIRST should handle by allowing an easy request to be initiated. The requestor would need to request the budget and dates proposed and provide a justification for the request. All would benefit from a check against a centrally maintained Sponsor list of those who allow spending before the award is executed and those that do not.

Award Validation/Generation

After the award has been validated, the information will be submitted to C&G who can provide a final

validation from a fiscal perspective, facilitate and coordinate any changes and then push the data into the Award, project, contract, and create spending authority. It is the hope that all of the data can be mapped with LITTLE additional entry in PeopleSoft.

Award Modifications & Prior Approvals

In an ideal situation, the University would apply for or submit a formal request for all changes in advance of receiving notification. In the case where we have such an opportunity, the request should be routed as noted below. When the University receives changes to an award that have not been requested by the University, then the modification will also be routed as noted below.

Fast Track (PI & Chair approve all others notified):

- No cost extension
- Reduction in effort
 - The team realized that when cost share is incurred as a result of effort budgeted as paid not actually being covered from the sponsored project, the assumption of cost sharing is never formally approved. Although we don't believe UFIRST can resolve an approval process, we recommend that reporting or other tools to identify and highlight this would be beneficial for the University.
- Change in subawardee
- Change in deliverables
- Change in fiscal and personnel restrictions

Full review (PI, Chair & Dean, Cost share providers approve; other affected personnel and their chair and Dean notified):

- Change in scope (an increase in key personnel effort of 25% or more might indicate a change in scope)
- Full or partial relinquishment of an award (any reduction in funding)
- Change in cost sharing
- Addition or removal of a subaward
- Change in publication restrictions or IP disposition
- Addition of alterations & renovations (construction)

Other:

- PI change
 - All affected personnel must approve
 - All affected chairs must approve
- Owning department change
 - All affected chairs must approve
 - If the change crosses colleges, both deans must approve
- Redistribution of credit
 - All named faculty and other key personnel must approve
- Addition of unfavorable or more restrictive terms
 - DSP would review and determine what approvals or notifications are necessary
- Budget transfers between subprojects or between categories on a single project

- Department or PI request sent directly to C&G who will facilitate. It is likely that credit may also need to be adjusted and the PI/Department should be so prompted.
- Requests for additional funding are routed according to the minimum/maximum budget revision procedures
 - Minimum
 - Defined as less than a 10% deviation from original proposed budget, no changes to key personnel or their effort commitment, no changes to cost sharing, no changes to the F&A base or rate, and no changes in the subcontractors
 - Submitted directly by certified department
 - Maximum
 - All those not meeting minimum criteria listed above
 - All affected personnel, all chairs, and all deans approve
- CAS exemptions
 - Department or PI request sent directly to the core offices (DSP or C&G depending on newly outlined procedures). Whether approved or denied, notification would be available for all administrators to see.

For those modifications which the University initiated the request and response is received from the Sponsor:

- When the response matches the request, DSP can act without further approvals.
- When the modification differs from the request, DSP will determine if those changes are minimal (currently defined as less than a 10% deviation from original proposed budget, no changes to key personnel or their effort commitment, no changes to cost sharing, no changes to the F&A base or rate, and no changes in the subcontractors).
 - If determined to be minimal, Chair approval is required.
 - If other than minimal changes, the PI, Chair and Dean must approve. If cost sharing or other named faculty or key personnel are impacted they will also have to review and approve.

Cash based activities

- Deposits to existing Fund 214 Clinical Trial projects: As soon as C&G identifies project to which the check relates, they can make the deposit. The awards reporting will be driven by the deposits made to the project during the reporting period, using deposit date as the award date. It is important to establish an audit process to ensure that there is appropriate institutional oversight.
- Addition to existing Miscellaneous Donors project
 - If the addition is over \$10,000 DSP would review documentation to confirm addition is appropriate. If so, the check and documentation are sent to C&G for deposit. No NOA is necessary. The annual awards report will be driven by the deposits made to the project during the reporting period, using deposit date as the award date.
 - If the addition is less than \$10,000, the check and documentation go directly to C&G who confirm appropriateness and deposit funds. The annual awards report will be driven by the deposits made to the project during the reporting period, using deposit date as the award date. It is important to establish an audit process to ensure that there is appropriate institutional oversight.

- The IFAS service program was discussed. Under this model small service agreements are expedited into a Multiple Sponsor project. Appropriate documentation is necessary. The F&A must cover RCM charges. The team liked this idea for small repeated services not amounting to Auxiliary levels.

Subawards

DSP currently has a system to develop and track subawards under development and scheduled to be released in October 2013. Developer Raymond Lukowe provided the group a demonstration of the tool, which provided insight not only into the business process but into the transparency a new tool could allow. The business process outlined in the development of that tool and the campus facing features were generally confirmed. Since the documentation on that process and system far exceed those that could be placed in a summary, a process flow is available in the UFIRST website "Project Documents" section under the Subaward Business Process Document (BPD).

In addition to that which was shown, the team expressed interest in leveraging the profiles of sub-recipients that are maintained for subaward monitoring. Subrecipients that have history of A-133 non-compliance, of prolonged negotiations, or delayed or problematic billing would be made evident in selection of subawardees, as early as the proposal stage. In addition, C&G currently has a log of all invoicing and payment activity on each subaward. Integrating that to UFIRST was recommended.

Closeout

As the team discussed closeout, the factor identified to have the most significant impact is more proactive management of the project throughout the life of the award. A dashboard for each project including:

- Milestone & deliverable tracking including repository for reports filed. This provides support in cases of misconduct, for patenting activity, and documenting report completion in order to receive payment.
- Unusual or problematic charges at the time they occur (using algorithms to identify duplicate charges, rotating charges, inappropriate combinations of vendors and account codes)
- Indications of personnel effort being expended but not charged to the project
- Identification of direct & indirect balances misaligned due to spending differently than budget
- Transparency into billing and receivables activity
- Integrate with external systems to know when and if progress reports were submitted (if possible)

Two other potential process improvements identified are to investigate expediting budget transfers on level 3 awards and possibly blocking certain account codes (such as equipment) near the end of a project period. A CAS exemption style approval could be requested to open the account if appropriate.

If the management of awards is improved, closeout activity becomes more efficient and focuses largely on the necessary final reports. A list of all closeout forms should have been loaded in to the system at the time of award set up or as someone became aware they were necessary. Common forms (i.e. patent and invention reports) should have templates created to facilitate completion. These would be available in the project dashboard with indicators as to when they are completed. Anyone with access to the record can load the reports and indicate they have been filed.

With increased visibility into closeout activities, work can start months in advance. All correspondence on closeout should be centrally logged, whether at the department level or at a core office. Having a “countdown” to closeout would also be helpful as an indicator of when it may be a good idea to start closeout activities.

For fixed price contracts where no unexpended balance must be returned, residual funds can be retained by the University. The team recommended continuing the current practice of allowing the PI to retain the balance as long as the residual does not exceed 25% of the total award. When the residual exceeds 25% of the total award, the Chair (or Dean if the PI is also the Chair) must approve.

The current IFAS model was presented and well received by the team. In this model:

1. Under a certain threshold, the balance simply is returned to the Senior VP
2. When there is less than 25% F&A recovery, the Senior VP and Chair receive residuals to compensate for the unrecovered F&A before the PI receives their residual balance.
3. When there is less than 25% balance remaining, the PI receives the residual (after F&A is covered per item 2)
4. When there is greater than 25% balance remaining (after F&A is covered per item 2), the PI receives up to 25% and the Chair and the Senior VP receive the rest.