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**American Recovery and  
Reinvestment Act (ARRA)  
Overview/Update:  
A Work-in-Progress**

**NCURA Region 1 Meeting  
June 11, 2009**

# Basic ARRA Requirements

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- All funds obligated by September 2010
- Funds must be tracked & reported separately.
- Special ARRA terms & conditions.
- Quick spending to stimulate economy
- Detailed quarterly reporting.
- Increased funding for Agency OIG.
- Agencies must provide links to OIG for reporting of fraud and abuse of ARRA funds.
- New HIPAA requirements.

# ARRA Administration & Reporting Requirements

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- Details still being addressed by OMB.
- Quarterly web-based reporting: Postponed to 10/10/09
- Combination of financial and programmatic reporting
- Data elements include
  - General information on recipient (e.g., DUNS # EIN)
  - Total ARRA funds awarded, amount obligated/expended, amount of unobligated balance
  - Detailed list of projects with name, narrative description, completion status
  - Subawards  $\geq$  25K detailed information
  - Subawards  $<$  \$25K: # and total cash disbursed

# ARRA Accountability & Transparency

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- Awards subject to A-110 and A-133
- Agency OIGs required to develop statistical testing to validate accuracy of information reported.
- Agency OIGs required to develop strategies to prevent or detect fraud and abuse.
- High risk programs and entities may be targeted for priority audits and investigations with quick turnaround.
- Failure to comply may result in agency enforcement actions – e.g., closer monitoring, withhold of support, recovery of funds, suspension or termination.

## Q&A: It's a Moving Target: Institutional Updates, Discussion, Etc.

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### Some things to think about

- Q-programmatic reporting
- LOC Drawdown
- Final data elements for reporting
- Are grant & contract reporting requirements the same?
- FFATA reporting requirements
- NIH issue: management of supplement & parent grant
- Ability to hire new staff quickly
- Meeting construction grant requirements
- Buy American provisions
- Etc., etc., etc.

### Panel

- Barbara Cole, Boston University
- Mark Daniel, Dana Farber
- Pat Fitzgerald, Harvard
- Amy Miarecki – UMass Medical
- Mary Mitchell – Partners
- Jill Mortali - Dartmouth

# Implications of ARRA Stimulus Funding: Planning, Preparation, and Survival

NCURA Region I RADG Meeting  
June 11, 2009

Barbara Cole, AVP Research Administration

# BU Applications and Awards

| Total Applications | Total Awards (#) | Total Awards (\$) |
|--------------------|------------------|-------------------|
| 366                | 13               | 3.81M             |

\*As of 5/31/09

# Challenges

- Short turnaround for proposal development & submission
- Quick turnaround at start-up of award (all assurances must be ready)
- New, more frequent technical and financial reporting requirements
- Need for timely spending of grant funds
- Increase in IRB and IACUC activity
- Increase in Just-in-Time requests

# Application Process-Streamlined

- Forms submitted with application or by specified date:
  - Pre-filled Proposal Summary Form (e.g., RC-1, SIG)
  - Project-specific Conflict of Interest Disclosure for each investigator (Hard copy, fax, or pdf)
  
- Forms to be submitted at the time of award (as applicable):
  - IRB approval of protocols involving human subjects
  - IACUC approval of protocols involving animals
  - Approval for use of radioisotopes, rDNA, select agents.

# Reporting Requirements

- ARRA funding must be tracked separately
- Recovery Act requires each recipient to submit quarterly reports to funding agency 10 days after the end of each quarter
- Minimum data elements:
  - Total amount of recovery funds received from agency
  - Funds obligated, expended, and unobligated balances
  - Project name, description, evaluation of completion status, estimate of number of jobs created or retained, how tempo of research has increased
  - Detailed information on subcontracts
- Reports with project level detail will be posted on Agency and Recovery.gov web sites

# Accounting Process – Streamlined

- Key field flags instituted for ARRA funds in on GL
- Monthly expenditure reports to targeted PI's
- Economic Impact Template?
- Subaward reporting – FDP Template changes

# What's Next?

- Awaiting further clarifications.....☺

# Implications of ARRA Stimulus Funding- Planning, Preparation and Survival

*June 11, 2009 RADG Meeting  
Mark Daniel, V.P, Research Finance  
Dana-Farber Cancer Institute*





# Preparing and Planning for ARRA at DFCI

- Goal: take advantage of the opportunity that this increased funding for cancer research through ARRA has presented
  - We had recently (January and February) completed a mid-fiscal year review of our FY09 operating budget in response to the external economic climate resulting in a “belt tightening” process. In many areas open positions were eliminated or placed on hold.
  - Now we were facing the immediate need to “ramp up” activity using existing resources in the pre-award grants management areas in both the research departments and in central office.



# Preparing and Planning for ARRA at DFCI: Pre-Award

- Planning effort began in late Feb 2009 with the announcement of ARRA
  - Communication across the DFCI Research Community
  - Use links to NIH for ongoing updates since the situation was evolving continually-especially during the first several weeks
  - Town meeting for faculty and administrators in March followed by FAQs
  - Polled faculty to try to get an idea of expected volume
  - Quickly put together team to identify ways to be more efficient and well coordinated.



# Preparing and Planning for ARRA at DFCI: Pre-Award

- Developed an online ARRA proposal “tracker” on a shared drive for use by departments & central G&C office to proactively plan for incoming ARRA proposals.
- It has worked well - plan to expand it’s use with other non-ARRA proposals.
- Due to tight time frames we worked to enhance closer coordination and communication around planned proposals with department staff and PIs.
- Initiated a weekly ARRA conference call for central and departments.
- Added an experienced temporary resource in central office to help with workload and reassigned another person to be our single point of contact to coordinate all SIG proposals



# Preparing and Planning for ARRA at DFCI: Pre-Award

- 1st wave of ARRA submissions were SIGs.
- Held a SIG mtg. Invited a PI with lots of experience in this area (currently directs a major core facility) who provided consultation for other PIs.
- Used templates where possible to help speed assembly of proposals.
- Processed 15 for the March 27<sup>rd</sup> deadline.



# Preparing and Planning for ARRA at DFCI: Pre-Award

- This close coordination continued through the “Challenge” grant proposals for the April 27<sup>th</sup> deadline as well as during the “High-End” Shared Instrumentation Grants for the May 6<sup>th</sup> deadline and the “GO” grant proposals May 29<sup>th</sup>.
- Our regular June NIH deadline activity followed this closely
- Meanwhile, we have begun receiving ARRA related awards



# Preparing and Planning for ARRA at DFCI: Post-Award

- Post-Award
  - While we wait for more details on the full reporting requirements, formats and timing, a team from post-award side has been focused on reviewing and preparing our procedures and systems.
  - Initially we focused on how to track, report on, draw cash, and closeout ARRA funds separately from other awards and what modifications we need to make to accommodate this.



# Preparing and Planning for ARRA at DFCI: Post-Award

- Primary systems for handling federal awards are InfoEd and PeopleSoft
- InfoEd:
  - InfoEd project activation & revision sheet (PARS) has been modified with fields to specifically identify ARRA awards including CFDA and document #s. Data is passed to PeopleSoft.
  - Documentation has been created for the new procedures and will be modified further as needed.



# Preparing and Planning for ARRA at DFCI: Post-Award

DFGM0160\_2455036.pdf - Adobe Acrobat Professional

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**DANA-FARBER**  
CANCER INSTITUTE

InfoEd Nbr: 2009-SUB-0186 **Project Activation and Revision Sheet** FM Initial:

Award Start Dt: 1/1/2009 PARS #: 2721

Award End Dt: 12/31/2011 5/15/2009 2:40:39 PM Award Year: 1 Page 1 of 2

Action Description

Action Needed: - New

Award Type: 100-299: NIH Project Id: RUC Code:

Billing Type: As Incurred PS Award Number: Is Master?: No

Purpose of the Award: Project Type: Pre-Award Exp Date:

Stimulus Funding?: Yes

Project Demographics

RBER  
TITUTE



# Preparing and Planning for ARRA at DFCI: Post-Award

## ■ PeopleSoft

- In the Peoplesoft financial system we have established a project # range and project type convention to identify NIH, DoD, NSF and other federal agency ARRA awards.
- In order to separately track and process cash reimbursements via letter-of-credit we created a new Contract Type for ARRA.
- Documentation and procedures have been created for these new modified processes
- Next steps



# Preparing and Planning for ARRA at DFCI: Post-Award

The screenshot shows a web application interface for the Dana-Farber Cancer Institute. At the top, there is a navigation bar with the logo and links for Home, Worklist, MultiChannel Console, Add to Favorites, and Sign out. Below this is a tabbed interface with tabs for General Information, Project Costing Definition, Manager, Location, User Fields, and Attachments. The main content area displays project details for project ID 2801105, including a description of 'ARRA - Summer Supplement', integration code '00002', and processing status 'Active'. It also shows a project schedule with a start date of 06/01/2009 and an end date of 05/31/2010. A description table is visible, showing a single entry with a date/time stamp of 06/01/09 10:44:09AM and user ID KLK33. At the bottom, there are buttons for 'Save as Template', 'Copy Project', and a 'Go To' menu with options like 'My Projects', 'Project Valuation', and 'Project Team'. A footer contains the Dana-Farber Cancer Institute logo and a set of utility buttons including Save, Return to Search, Notify, Refresh, Add, Update/Display, Include History, and Correct History.

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Home | Worklist | MultiChannel Console | Add to Favorites | Sign out

[New Window](#) | [Help](#) | [Customize Page](#)

General Information | Project Costing Definition | Manager | Location | User Fields | Attachments

Project: 2801105 [Add to My Projects](#)

\*Description:   Program Processing Status: Active PARS Sheet ID:

\*Integration:  Dana Farber Cancer Institute Project Status: [Open](#)

Project Type:

Percent Complete:  As Of:

Project Health:  As Of:

Project Schedule

\*Start Date:  \*End Date:  [Additional Dates](#)

| Description   |
|---|
| Date/Time Stamp: 06/01/09 10:44:09AM User ID: KLK33 |
| Description:  |
| Long Description:                                   |

[Save as Template](#) [Copy Project](#)

Go To: [My Projects](#) [Project Valuation](#) [Project Team](#) [Project Activities](#)

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# Preparing and Planning for ARRA at DFCI: Post-Award

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Home | Worklist | MultiChannel Console | Add to Favorites | Sign out

[New Window](#) | [Help](#) | [Customize Page](#)

General Information | Project Costing Definition | Manager | Location | User Fields | Attachments

Project: 2801105 [Add to My Projects](#)

\*Description: ARRA - Summer Supplement  Program Processing Status: Active PARS Sheet ID: 6220

\*Integration: 00002 Dana Farber Cancer Institute Project Status: [Open](#)

Project Type: ARRA Recovery Act of 2009

Percent Complete: 0.00 As Of:

Project Health: As Of:

Project Schedule

\*Start Date: 06/01/2009 \*End Date: 05/31/2010 [Additional Dates](#)

Description Find | View All First 1 of 1 Last

Date/Time Stamp: 06/01/09 10:44:09AM User ID: KLK33

Description:

Long Description:

[Save as Template](#) [Copy Project](#)

Go To: [My Projects](#) [Project Valuation](#) [Project Team](#) [Project Activities](#) [More](#)

[DFCI Fringe Flag](#)

[Save](#) [Return to Search](#) [Notify](#) [Refresh](#) [Add](#) [Update/Display](#) [Include History](#) [Correct History](#)

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CANCER INSTITUTE**



# PREPARING FOR ARRA AT HARVARD

Patrick Fitzgerald  
Associate Dean for Research Administration  
Faculty of Arts and Sciences, Harvard University  
RADG Meeting  
June 11, 2009

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# ARRA: OPPORTUNITIES AND RISKS

**Signed, sealed, delivered: ARRA**



**THE WALL STREET JOURNAL**

**Harvard Hit by  
Loss as Crisis  
Spreads to  
Colleges**



# PRESIDENT OBAMA'S MANDATE

The President has made it clear that every taxpayer dollar spent on our economic recovery **must be subject to unprecedented levels of transparency and accountability**. He has five crucial objectives for Federal agencies, to ensure that:

1. Recovery funds are awarded and distributed in a prompt, fair, and reasonable manner;
2. The recipients and **uses of all recovery funds are transparent to the public, and that the public benefits of these funds are reported clearly, accurately, and in a timely manner**;
3. Recovery funds are used for authorized purposes and **every step is taken to prevent instances of fraud, waste, error, and abuse**;
4. Projects funded under the recovery legislation **avoid unnecessary delays and cost overruns**; and,
5. Programs meet specific goals and targets, and contribute to improved performance on broad economic indicators.

# Transparency and Accountability



# RECOVERY.GOV

## ○ INSPECTOR GENERAL FINDINGS

The Inspector General for each Federal agency that received recovery funds is reviewing the money spent to prevent fraud, waste and abuse, and ensure funded projects meet planned objectives. IG findings are listed below.....

➡ Government is deploying more auditors dedicated to oversight of ARRA awards

# HARVARD ARRA PLANNING

- Weekly meeting of all school SPA officers are held to identify ARRA issues and plan for implementation
- Issues discussed include:
  - Communication of funding opportunities to PIs
  - Discussion of agency guidance
  - Proposals submitted (number of applications and \$)
  - Identification of ARRA proposals and awards in grants management system (“GMAS”)
  - Meeting special ARRA reporting requirements
  - Administrative support– creation of “Stimulus Project Specialist” position

# Administrative costs under ARRA

- February 17, 2009, American Recovery and Reinvestment Act (ARRA) signed into law
- February 27, 2009, COGR letter to OMB requesting permission to direct charge research specialists to ARRA awards
- May 4<sup>th</sup>, Presentation by Jeannette Gordon, NIH at Region I meeting:
  - Slide **ARRA Planning: The Future is Now**
    - “Include “research administration specialists” in applications to work with Investigators on ARRA administrative requirements”

# Administrative Costs under ARRA

- May 6<sup>th</sup>, NSF update at Region I meeting: “NSF will not allow direct-charged administration on ARRA awards” (Jeremy Leffler, NSF)
- May 8<sup>th</sup>, J. Leffler (NSF) email to P. Fitzgerald **“unless there is further guidance from OMB on the issue, NSF will not be authorizing NSF staff to approve inclusion of direct costs to universities to compensate for costs associated with administering ARRA awards.”**
- May 13<sup>th</sup>, OMB memo specifying how state and local governments could charge 0.5% of the ARRA funds received for compliance costs

# Administrative Costs under ARRA

- May 13<sup>th</sup>, COGR issues second letter to OMB with proposal to allow a 2% increment, applicable to ARRA funded research, to be added to each institution's indirect cost rate “providing similar administrative relief as was provided to state grantees”
- May 15<sup>th</sup>, NIH posts FAQ which states that ARRA grant budgets may not include administrative costs—
  - ARRA requirements do not provide sufficient justification to support the provision of direct costs for administrative support in addition to the F&A costs in the awarded budget (citing A-21, F.6.b.(2))

# Harvard's Approach to Administrative Support for ARRA Funding

- Harvard expects to receive substantial ARRA funding from NIH, NSF, DoD, DoE, NASA
- ARRA funding offers enormous potential for Harvard researchers but the funds are accompanied by a high degree of risk; these awards must be managed properly
- ARRA funds will have unprecedented accountability and reporting requirements and will be subject to extraordinary oversight by government agencies and the public
- Harvard doesn't have capacity to absorb anticipated surge in new funding with existing staff

# Proposal to Harvard Deans

- Applications for stimulus funding must include “Stimulus Project Specialists” (SPS) to oversee ARRA grants, including monitoring of expenditures and assisting PI in submission of time and accurate reporting.
- Experienced grants administrators to be hired on a term basis with the sole purpose of administering ARRA awards
- SPS will report to SPA offices, not PI
- Applications for stimulus funding should include 3.5% of direct costs in budget for salary of SPS (plus benefits)

# Advantages of Harvard Proposal

- Short term nature of ARRA funding, complexity of requirements, increased volume, make it impractical to assign administration of ARRA awards to existing staff
- Experienced grant specialists will assume responsibilities for complex administrative tasks that would otherwise be responsibility of faculty or, in some cases, less experienced administrators
- Use of “specialists” dedicated to ARRA awards, and not “dept. administration,” is consistent with federal regulations for direct-charging
- Greater accountability will require increased staff to provide extraordinary level of monitoring to prepare for unprecedented oversight

## NEXT STEPS

- Harvard schools will each determine whether to move ahead with hiring of “SPS,” depending on volume of ARRA awards received and other factors
- FAS is committed to hiring “specialists” to administer on ARRA awards, funding the position from F&A recoveries
- Job description and position description have been drafted, advertising will be commence soon
- Harvard schools will collaborate on training for SPS and departmental personnel
- Send resumes to: [pwf@fas.harvard.edu](mailto:pwf@fas.harvard.edu)