



Annual Report of the Council on Sponsored Activities Fiscal Year 2015

The Council on Sponsored Activities (CSA) is responsible for proposing and endorsing internal policies regulating activities sponsored by agencies outside the College. In addition, the CSA proposes and endorses institutional positions in response to policies of external sponsoring agencies as they affect the College. On a periodic basis, the CSA reviews the scope and impact of sponsored activities in relation to institutional purpose. The membership of the committee consists of the Provost; the Executive Vice President for Finance; the General Counsel (OGC); the Director of Office of Sponsored Projects (OSP); the Deans of the Faculty of Arts & Sciences, Geisel School of Medicine, Thayer School of Engineering, and Tuck School of Business; two faculty members appointed by the Steering Committee of the General Faculty (SCGF); and two members from the Faculty of Arts & Sciences delegated from the voting membership of the Committee on the Faculty (COF).

The CSA met 3 times during the year: November 19, 2014; January 15, 2015; and May 14, 2015.

The members were: Leslie Henderson, Chair (Geisel Dean representative); Martin Wybourne (Provost representative); Michael Wagner (EVP representative); Jill Mortali (OSP); Lori Sostowski (OGC representative); David Kotz (Dean of Faculty of A&S representative); Tillman Gerngross (Thayer Dean representative); Robert Hansen (Tuck Dean representative); Charles Sentman (SCGF); Elsa Garmire (SCGF); Stephen Taylor (COF); and Adina Roskies (COF). Ex Officio members include Elizabeth Bankert, Committee for the Protection of Research Subjects, and Tammy Hickox, Conflict of Interest Officer.

A variety of issues were discussed and CSA members provided feedback in terms of the relative priority of the issue and whether or not the issue was within the scope of the CSA.

- 1. Institutional COI** – While certain federal sponsors have addressed individual researcher’s financial conflicts of interest for a number of years (PHS and NSF in particular), an emerging area of regulatory oversight concerns *institutional* interests that may present the appearance of a conflict of interest. For example, organizational conflicts of interest might arise when an institution has a financial stake in its research – e.g., intellectual property rights to a drug or device in a clinical trial. The CSA generally agreed that a policy on organizational conflicts of interest would be prudent, but they raised questions about the process for developing and administering such a policy. Office of General Counsel and Provost’s Office are working on a draft policy, which will come back to the CSA for approval.
- 2. Fee for Service Contracts** – On rare occasions, faculty or Dartmouth programs wish to engage with outside entities to provide services on a fee-for-service basis under contractual terms that are atypical for academic research programs. The CSA agreed that this may be a topic for the committee to address. However, the volume of these types of agreements is small and it is unlikely to be a top priority.
- 3. Crowd-funding for research projects** – There have been a very small number of inquiries from researchers concerning the possibility of using crowd-funding websites to raise funds for research. There are a number of business operation and compliance questions that need to be addressed in a policy. Any initiative to discuss this topic or develop a policy or procedures

should involve other offices including Development.

4. **Policy on Start-Up Company Activities in Dartmouth College Space** – A policy on start-up company activities in Dartmouth space has been in existence for decades. The policy describes the limitations, process and approval mechanism for use of Dartmouth space for a faculty startup company. However, the policy is outdated and little known by faculty, students and staff who may have interest in these activities. The CSA agreed that the policy should be updated. Policy on Start Up Activities – a small working group with representation from Office of Entrepreneurship and Technology Transfer, Office of General Counsel and Office of Sponsored Projects is making progress. As an interim step between drafting a policy and bringing it to the CSA for consideration, the working group should get input from faculty members who have been involved in start-ups. Following CSA approval, the policy would need to go to each school and the Academic Planning Committee.
5. **Oversight/review of activities conducted with reserve/PDF/start-up funds** – Many of the compliance oversight mechanisms for review of activities occurs through the proposal and award processes. However, parallel mechanisms do not exist for oversight of activities supported by non-sponsored funds, raising a concern, particularly with respect to financial conflicts of interest. The CSA felt this was outside of its purview and voted to not implement additional compliance oversight for non-sponsored funds.

Standing Invitations to the CSA – The Council discussed and voted in favor of officially extending a standing invitation to certain ex-officio representatives of different areas of the College for advice and support to the Committee.

Committee for the Protection of Human Subjects
Conflict of Interest Officer
Office of Entrepreneurship and Technology Transfer /TTO – Trip Davis and Glennis Gold
Environmental Health and Safety – Maureen O'Leary

Other Updates Given to the CSA:

Update on OMB Uniform Guidance: The Office of Management and Budget promulgated a new Circular that will govern federal grants and cooperative agreements. The “Uniform Guidance” (Circular) consolidates and updates federal requirements which have been in place since the 1980s. The combined circular includes administrative requirements, cost principles, and audit requirements for federal awards. The effective date of this Uniform Guidance is December 26, 2014. Various groups have worked and continue to work to respond to the changes in process that we will need to make. Of concern are changes to the procurement standards that would necessitate additional burdensome bidding processes for low dollar transactions of \$3000 or more. As of the date of these notes, the government has delayed implementation of this component of the guidance. Positive changes to federal grant rules include greater flexibility on charging certain costs to grants and the recognition of great utility costs for research labs in the indirect cost rate.

Update on NIH Biosafety Site Visit: Maureen O'Leary, Director of Environmental Health and Safety provided an update on the NIH site that took place on January 21. NIH has been conducting audits since 2006, and this is a routine visit.

Update on Association for the Accreditation of Human Research Protection Programs

(AAHRPP): Elizabeth Bankert provided an update on the IRB accreditation process. The CSA will have a role in implementing required policy changes, e.g. establishing an institutional conflict of interest policy.

Update on F&A Proposal: Jill Mortali provided an update on the Facilities and Administration/indirect cost rate, which is renegotiated every 4-5 years. The proposal will be submitted in April. Geisel is working on a policy regarding indirect cost rates and waivers. That policy will be shared with the CSA as an informational item.

Discussion of Need for Training and Clarification of Effort Reporting: Jill Mortali reported that a recent situation brought to light that some departments are confused about the appropriate mechanisms for charging labor to grants. Better training is needed, and annual certifications, which reduce the administrative burden, may not be sufficient. The CSA suggested informing grant managers and administrators is the best way to reach faculty.

Public Access Requirements from Federal Funding Agencies: Barbara DeFelice, Director, Digital Resources and Scholarly Communications Programs at Dartmouth College Library, and Jill Mortali, Director of the Office of Sponsored Projects, provided an overview of expanding federal and non-federal requirements to make the results of research publicly available. Non-federal sponsors such as the Gates Foundation are interested in leveraging research investments by making data available to more researchers. Federal agencies have been given a mandate to implement policies and procedures that make publications publicly available and data accessible to be shared with other researchers. Related to this agencies require data management plans. The library and OSP are working to educate faculty on these requirements and make tools available to facilitate the process.

Sponsored Awards and Proposals for Fiscal Year 2015 – The summary of the Annual Sponsored Awards and Proposals for FY2015 is attached to this report, and the complete report will be located at the Sponsored Projects website: <http://www.dartmouth.edu/~osp/resources/reports/>.

I trust this information provides a helpful summary of the CSA activities during the past year.

Respectfully submitted,

Leslie Henderson
Chair, Council on Sponsored Activities

Jill Mortali,
Director, Office of Sponsored Projects