

Research Administration in Europe – A Splash in the Pond: Implementation of the Uniform Guidance at an International Institute



By Laura Plant Fuentes and Eva Björndal

Much like a small fish in the big pond, we are trying to determine how and what we need to do to implement the uniform guidance into our institutional policies. However, while the Uniform Guidance (UG) has been a big change for US institutions, as a foreign institution we are taking it one step at a time and awaiting agency specific guidelines rather than the guidance as a whole. For us, it does not mean our whole funding guidelines have changed. In fact, despite the common misconception, foreign institutions are not eligible for funding from many US agencies.

The two large issues that the UG has raised for our institution are F&A rates and auditing requirements but we await agency specific implementation of the UG for full clarification of these issues.

The UG initially caused confusion regarding the F&A rate we could use from NIH. As a foreign organization we have no negotiated F&A rate. Instead we use the 8% that is allowed to foreign organizations as stated in NOT-OD-01-028 from the 21st of March 2001. From December 26th 2014 we thought we were eligible to apply for a 10% F&A rate from NIH. Applications that went in from our institution in early January requested the 10% rate but we soon learnt, via our NCURA Collaborate colleagues, that the NIH would not use this rate for international participants. This came as a surprise to us and others, and in the time between the introduction of the UG and the release of the NIH Interim Grant General Conditions we experienced confusion and incorrect budgets. However, our NCURA

networks provided most of the support during this time and we are grateful for the official news that has been published in the NCURA magazine and the Monday e-Xtra but we are especially thankful to those who communicated unofficially with us via the Collaborate Platform or via direct contact.

In 2011 we implemented a policy at our institution to conform to NIH regulations indicating that F&A costs could only cover compliance and auditing costs. In line with the UG, the NIH has now released new conditions removing the condition that F&A costs support the costs of compliance with NIH requirements. This policy change will be reflected in the NIH GPS and will apply retroactively as of December 26, 2014. This decision will make the distribution of funds at our institution much simpler since we currently have a model whereby NIH F&A costs are centralized to cover compliance and audits, yet part of the overhead costs are waived on NIH grants and these funds are distributed to the appropriate departments in a yearly reimbursement. Our model, although advantageous to the researchers involved, was confusing and led to resentment since researchers assumed they were losing their indirect costs to the central administration. We welcome this new change in policy and the clarity and transparency in the use of funding in NIH grant management.

The second area which was somewhat unclear to us as a foreign institution was whether our option to conduct program specific audits rather than the A-133 audit would be changed. Thankfully the UG has made this clearer.

However in terms of changing the amount from \$500,000 to \$700,000 we need to investigate how many of our subrecipients fall outside the audit requirements and implement stricter subrecipient monitoring. Many of our subrecipients are in countries that are considered high risks and to have more subrecipients that are not required to send an audit is certainly an increased risk. Of course this has implications for us in terms of dedicated resources to NIH-compliance issues.

The International Community of NCURA is rapidly growing and our capacity to support each other is also growing. We receive regular updates from each other via our Region VIII network but we appreciate any information that our primes can provide to us regarding the UG and new rules and changes we need to implement. While the UG is a big change for all involved in grant management, and has had a large impact for US institutions, as foreign institutions we are currently seeing it as a ripple on the water in a larger pond of the unknown. ■



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