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**The Evaluation of the Role of Research Administrators
in the Biomedical Research Grant Lifecycle and How
Public Universities' Policies are Designed to Protect
Funding**

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Summer 2021

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Executive Summary

There was a time in the not-so-distant past, where a simple infection had the opportunity to send an individual to an early grave. With advancements in biomedical research, medical professionals can treat simple infections as well as more complicated illnesses. Medical research has come a long way, but there is still a need for research in order to find, treat, and advance cures for illness and disease. Last year, during the COVID-19 pandemic, the entire world was waiting for researchers to create a vaccine to help slow the spread and get the world back to operating at a normal capacity.

The impact of Covid-19 has shown the world the importance of biomedical research and why funding is necessary to continue the fight against infectious and terminal diseases. Daily, research administrators play a vital role to ensure the protection of grant funding and the validity of the research. Protection of this funding is a primary concern of research administrators however there are some cases where fraud may occur.

This paper reviews the history of research administration, the early research conducted on the role of the research administrator, and the lifecycle of a grant. In addition, there is a review of fraud cases, the policies of the research universities where fraud has occurred, and a comparison of those policies. Based on the findings, there are recommendations for best practices to aide in preventing fraud.

Introduction

Biomedical research touches the lives of all who receive medical care, whether it be an antibiotic or a cure for a rare disease. To fund this research, researchers across the world rely on grant dollars to find the next cure. The largest funding agency of biomedical research in the United States is the National Institutes of Health (NIH). Each year the NIH awards approximately \$41.7 billion dollars for medical research (National Institutes of Health, 2020). Over 80 percent of grant awards from NIH are to medical schools, universities, and research institutions (National Institutes of Health, 2020). Most institutions have research administrators who work with the investigators who are recipients of the grant awards. The research administrators assist with the application process, provide oversight, review, maintenance, and compliance for the sponsored projects.

With a quick Google search, examples of fraud can easily be found. Example headlines include, "*Former SBU professor sentenced for stealing cancer research funds*," (O'Keeffe, 2020), and "*Former Florida professor indicted for fraudulently obtaining \$1.75M federal grant*," (Swirko, 2021). To protect the federal funding that is provided to these researchers, research administrators are tasked with the responsibility of ensuring investigators are spending grant funding appropriately and following the rules and regulations set forth in the uniform guidance and grant guidelines. The intent of this paper is to identify best practices of research administrators who are effectively protecting federal funding through oversight, review, maintenance, and compliance practices.

Literature Review

As research institutions push investigators to teach more classes, conduct more research, obtain more grant dollars, and publish more journal articles, the risk of research misconduct grows. Research misconduct can come in many forms such as data fraud, falsification of authors, misuse of grant dollars, wire fraud, misrepresentation of foreign affiliations, etcetera. Research administrators are tasked with assisting with the application of grants, providing oversight, review of grants, grant maintenance, and compliance for the sponsored projects. The following is a review of the role of the Research Administrator in the current context of the university research setting.

History of Research Administration

To better understand the role of the research administrator in today's context, an understanding of the history of research administration is necessary. In the United States until the 1940s, it was unofficially the policy of the government not to fund specific scientific research, even though there were select programs funded (Beasley, 2006).

Research administration is a relatively new field, first contrived in the 1940s, under President Franklin D. Roosevelt in response to the growing need of regulation stemming from uncoordinated research efforts that led to the need for regulations and control (iDoGrants, 2019). President Roosevelt charged Dr. Vannevar Bush, Director of the Office of Scientific Research and Development, with developing a way for the government to aid in research activities, both private and public (Bush, 1945). Nearing the end of World War II, President Roosevelt was concerned that making known the contributions the United States Military made to science during the war; continuing the

war on disease by furthering the work that had been done in medicine and related science; and creating a program for American youth to continue the development of talent for future scientific research (Bush, 1945). The concerns raised by President Roosevelt led to the recognition of importance of comprehensive and ongoing research as well as the creation of research guidelines (Vanderford et al., 2019).

In the 1950s and 1960s, the new research administration needed support through professional organizations, thus the National Council of University Research Administrators (NCURA) and the Society of Research Administrators (SRA) were born (iDoGrants, 2019). In the 1980s and 1990s, there was a demand for research accountability as biomedical research increased (Vanderford et al., 2019). There were regulatory compliance needs that could not be filled by university administrators or faculty (Vanderford et al., 2019). As a result, research administrators filled the void and were finally a recognized profession by peers as playing a crucial role in conduct and management of research (Vanderford et al., 2019). In today's context, research administrators are necessary for investigators to be awarded federal monies due to law and policy (Beasley, 2006).

Early Research Conducted on the Research Administrator Role

In 1959, Dr. Norman Kaplan published research about the role of the research administrator in *Administrative Sciences Quarterly* detailing the job of the research administrator, the role of the research administrator in the context of the goals of the research organization and the scientist, and selected aspects of the role of the research administrator that are of special importance (Kaplan, 1959). Dr. Kaplan spent two years conducting formal visits to research organizations and obtained data through intensive

case studies, interviews, organizational documents, and observations (Kaplan, 1959). From his research, Dr. Kaplan concluded that the role of the research administrator was not formalized from within the research organization or from organization to organization (Kaplan, 1959). The research administrator is caught in the middle of the scientist and those of higher authority within the research organization (Kaplan, 1959). Further research was needed on the nature of the position and the individual best suited for the position (Kaplan, 1959). Dr. Kaplan laid the groundwork of what research administrators have transformed into today.

According to The University of Texas at Austin, “A research administrator is anyone – from administrative assistant to Vice President for Research – that performs administrative maintenance, compliance, review, or oversight for a sponsored program,” (The University of Texas at Austin, 2017, pp.1). The University of Texas at Austin has a very broad definition of the research administrator, but encompasses most individuals who have a role in ensuring successful grant funding and grant management. When reviewing the roles that a research administrator must fill, it is important to note that the roles vary depending on the stage of the sponsored project. To better understand the role of the research administrator, it is important to understand the lifecycle of a grant.



(USDA) <https://nifa.usda.gov/grants>

Lifecycle of a Grant

The lifecycle of a grant goes through three main phases: the pre-award phase, the award phase, and the post award phase (Grants.gov). The pre-award phase is the beginning of the grant lifecycle and includes reviewing and determining grant opportunities for application, the submission of an application, and finally the review of the applications (Grants.gov). Research administrators in the pre-award stage pay special attention to the following: funding announcement guidelines, proposed budgets, adherence to funder general guidelines, investigators have proper organizational approvals, and proper regulatory and compliance assurances.

According to Grants.gov, the award phase is the middle phase of the grant lifecycle and includes the award decisions and award notifications. Federal agencies make award decisions based on programmatic and financial reviews of the applications (Grants.gov). Research administrators at this stage receive the notice of award, execute the contractual agreement associated with the notice of award, and make arrangements internally, such as account set up, to begin the research.

The post award phase is the last phase of the grant lifecycle and includes the implementation, reporting, and closeout of the grant (Grants.gov). The post award phase is the longest phase of the grant lifecycle as this is the phase that ensures the receiving organization is complying with the terms of the grant (Grants.gov). Federal agencies monitor the progress of the grant through procedures to maintain transparency and attempt to prevent fraud and abuse, utilizing yearly progress reporting requirements (Grants.gov). Auditing is a major factor in this phase and if an organization expends more than \$750,000 in federal awards, the grants qualify the receiving organization to be subject to single audits (Grants.gov). A single audit can be defined as an organization-wide audit of a non-federal entity (DATA Act Program Management Office (DAP), 2021). The purpose of the single audit is to assure the Federal government the entity has sufficient internal controls and is in compliance with grant and program requirements (DATA Act Program Management Office (DAP), 2021). Finally, the post award phase ends with the closeout step, through the submission of programmatic and financial reports (Grants.gov). The research administrators in this phase play a vital role, ensuring compliance with reporting and auditing throughout the life of the research project.

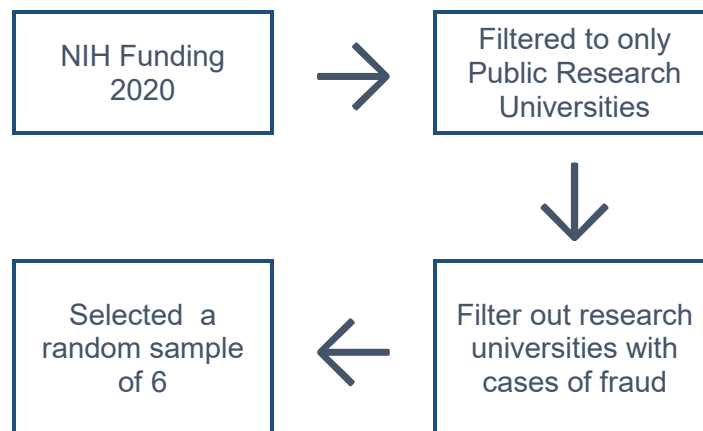
Understanding the history, research related to research administration, the lifecycle of the grants and the roles associated with the phases of the grant lifecycle helps to increase understanding of the overall role of the research administrator. The role of the administrator is ever changing.

Research Design

The primary objective of this study is to investigate the role of the research administrator in protecting federal funds.

- 1) What is the role of the research administrator in protecting grant monies?
- 2) Do research universities have appropriate policies in place to support research administration as they manage and protect federal monies?

News articles, cases of fraud, and policies of research universities have been collected and will serve as the primary source of information for the study. The news articles and cases of fraud were collected through Google searches and through the US Department of Health and Human Services, Office of the Inspector General's audit reports. To narrow the focus of this study, cases of fraud specifically related to grants funded by the National Institutes of Health in the last 10 years have been reviewed.



The NIH release the funding numbers for each funded organization and for this paper the funding numbers from 2020 were utilized (U.S. Department of Health & Human Services, 2021). All public research universities were filtered from the list and a random sample of six research universities were selected. Public research universities with previous cases of fraud were excluded from the random sample. This was done to ensure that the institutions who had cases of fraud identified above, could be compared to institutions that did not have known cases of fraud. A matrix was created using the

Office of Management and Budget's Uniform Guidance to compare the grant policies of the research universities with publicly available policies. Uniform Guidance is the authoritative set of rules and requirements for federal awards that cover a wide array of topics including uniform administrative requirements, cost principles, and audit requirements (Office of Management and Budget).

Institutions with no known fraud for the last 10 years were compared to the institutions with known fraudulent activity. An investigation was then made to determine if the policies aided the research administrators in protecting the federal monies awarded to researchers at the respective research universities.

Analysis and Findings

Fraud Cases

Instances of fraud were located through internet searches and divided into categories. First, the cases of fraud were divided based on whether the research university involved was either a public institution or private institution. Private institutions were eliminated from the data source and only public institutions were utilized. Next, the funding entities of the research grants were evaluated, and only grants that were funded by the NIH were utilized. Finally, the fraud type was divided into two categories:

- 1) Fraud that could be identified by a research administrator.
- 2) Fraud that could not be identified by a research administrator.

Fraud that could be identified by a research administrator included misuse of funds, foreign affiliations, and theft. Fraud that could not be identified by a research administrator included manipulation of images, falsification of data, or fraud that

requires extensive technical expertise to identify. Based on the analysis strategy identified in the previous section, the following findings of fraud were identified.

The University of Florida, Penn State University, The Ohio State University, and Stony Brook University all experienced fraud by researchers.

1) University of Florida:

A University of Florida associate professor and researcher was charged with six counts of wire fraud and four counts of making a false statement to a U.S. Agency (Swirko, 2021). The researcher received \$1.75 million in a federal grant funded by the NIH (Batchelor, 2021). The researcher served as the primary investigator on the grant and was using the grant monies to bolster profits for his business located in China (Batchelor, 2021). The researcher also failed to disclose his support from the Chinese government. The researcher traveled to China in 2019 and has not returned (Batchelor, 2021).

2) Penn State University:

A former Penn State professor and researcher was sentenced to 3.5 years in prison and forced to repay \$660,000 to Penn State and two federal funding agencies (Miller, 2012). The researcher pleaded guilty to charges of wire fraud, money laundering, and making false statements to secure grants (Miller, 2012). The researcher received a \$1.2 million grant from the NIH, and a \$1.9 million grant from the U.S. Department of Energy. The researcher failed to uphold one of the requirements of the grant by failing to send the planned funding of over \$500,000.00 to Penn State Milton S. Hershey Medical Center (Miller, 2012). The

researcher repeatedly funneled grant money into a personal account to pay for vacations and to purchase his own books (Miller, 2012).

3) The Ohio State University:

A researcher at Ohio State University was charged with using false documents in a fraud scheme (Kovac, 2020). The researcher received more than \$4 million in grant monies from the NIH, while at the same time receiving funding from the National Natural Science Foundation of China (Kovac, 2020). The researcher had planned to take his federally funded research back to China (Kovac, 2020). The researcher was sentenced to 37 months in prison and was ordered to pay more than \$3.4 million to the NIH and over \$400,000 to the Ohio State University (US Department of Justice, 2021).

4) Stony Brook University:

A former Stony Brook University associate professor was sentenced to one year and one day of prison while being forced to pay restitution in the amount of \$225,000 to the NIH and SBU's foundation and state-sponsored grants (Faila, 2020). The professor was charged with theft of government funds (Faila, 2020). The grants were intended for cancer research. The former professor created fake companies and submitted invoices to Stony Brook University for goods and service that were never provided by these companies. The researcher used the money paid to companies to pay for personal expenses such as mortgage payments and tuition (Faila, 2020).

The researchers at the University of Florida and Ohio State University both had ties to a foreign entity and involved an attempt to steal taxpayer funds from the American people. In response to an uptick of foreign governments attempting to obtain the US Government's intellectual property, NIH has instituted new requirements on the NIH Biosketch to capture a researchers' foreign affiliation. Policy NOT-OD-21-073 updated the biosketch requirements to support the need for applicants and recipients to be more transparent and provide an avenue for full disclosure of research activities foreign and domestic (National Institutes of Health, 2021). While this may not eliminate foreign governments from trying to steal intellectual property, it will highlight foreign affiliations to help research administrators identify risk.

The fraud committed at both Penn State University and Stony Brook University is concerning because in both instances researchers were able to funnel grant funds into either fake businesses or into personal accounts, thus allowing them to use grant funds for personal use. The fraud that was committed by both researchers was not fraud that happened overnight, but rather over a period of years. It is concerning that the fraud took years to find and raises concerns with the oversight provided by the universities. It raises the question of where the failures occurred; was it research administrators overlooking red flags, not conducting audits regularly, or general negligence of their job responsibilities?

The major takeaway from these instances of fraud is that major research universities are not immune to fraud. Research administrators have an enormous task of ensuring that these researchers are following rules, guidance, and policies associated with running a research project. The research administrators must be armed

with proper university policy to ensure that the researchers are upholding the uniform guidance and grant guidelines.

Policies of Research Universities with NIH Grant Fraud in last 10 Years

The following section investigates the policies of the universities described in the previous section. The investigation includes analysis of 1) the types of policies as well as 2) accessibility to the policies, 3) policy guidance, and 4) policy procedures in place.

1) University of Florida

The University of Florida has a unique approach to policies on their website. While the section is named research policies, detailed policies and procedures are not readily available. (<https://research.ufl.edu/dsp/research-policies.html>) Instead, there are overviews and users must click through each category to determine if there is a detailed policy, procedure, or guidance available. When there are policies available, they do not seem to follow a specific format as each is presented differently. While there are policies available and they conform to Uniform Guidance, enforcement of such policies may be difficult due to the format. One specific instance is the overview of cost accounting standards. The cost accounting standards provide a link to the Legal Information Institute at the Cornell College of Law explaining what cost accounting is and an additional link titled, "Charging Costs Directly or Indirectly to Federally Funded Sponsored Project." The format of the policy and multiple links involved could confuse users and make the research administrator have difficulties enforcing policies. There were no

policies related to foreign affiliations, which could have helped in preventing the fraud that occurred at the University of Florida.

2) Penn State University

Of all of the universities included in this study who had fraud associated with NIH grants in the last 10 years, Penn State has the most extensive list of policies including audit procedures. (<https://policy.psu.edu/policies#Research>)

With extensive audit policies, it is unexpected that an individual researcher would be able to commit wire fraud, money laundering or using grant money for personal use. The policies and guidelines were easily accessible and categorized based on if they were research administration policies, research protection policies, research administration guidelines, research protection guidelines, safety, travel, intellectual property policies, intellectual property guidelines, financial policies or financial guidelines. Penn State's policies specifically address who is ultimately responsible for adhering to the policies and an outline of the appeals process if a researcher would like to appeal a determination. The policies and guidance adhere to Uniform Guidance.

3) The Ohio State University

The Ohio State University has an easily accessible list of policies, guidance, and procedures. (<https://orc.osu.edu/regulations-policies/general/>) The policies themselves are very clear and detailed. There are no policies related to other support, effort reporting, or foreign affiliations. Additional policies dealing with other support and foreign affiliations could have allowed the research administrator to pick up that the researcher was receiving funds from another

government and could have potentially taken some of the liability off Ohio State. Overall, the policies are more generalized and there are not policies that deal with the audit of sponsored projects. The policies and guidance adhere to Uniform Guidance.

4) Stony Brook University

The policies of Stony Brook University are available but difficult to locate. The policies are not in a central library like some of the other universities. The user must click through categories such as human subjects, responsible conduct of research, post award management, and more.

(<https://research.stonybrook.edu/resources.php>) Users may have trouble locating specific guidance, procedures, or policies, which could lead to non-adherence. Stony Brook does have an independent contractor policy that could have highlighted the fake businesses mentioned in the fraud case explained previously; however, it is not clear when this policy was created. Compared to other universities' approaches, there is a lack of policy transparency; those that were identified adhere to Uniform Guidance.

Policies of Research Universities Without NIH Grant Fraud in last 10 Years

From the random sample selection detailed above, the following research universities without NIH grant fraud reviewed include the University of Wisconsin, the University of Washington, the University of Minnesota, the University of Utah, the University of Kansas, and Indiana University- Purdue University Indianapolis. These

research universities did not have any occurrences of fraudulent activity on NIH funded grants during the last 10 years.

Universities included in this group were evaluated with respect to existing policies related to researchers and research administrators. The investigation includes analysis of 1) the types of policies as well as 2) accessibility to the policies, 3) policy guidance, and 4) policy procedures in place.

1) University of Wisconsin:

The University of Wisconsin has a robust list of policies, guidance, and procedures available to researchers and research administrators.

Policies, guidance, and procedures are easily accessible on the University of Wisconsin-Madison Research and Sponsored Programs website.

[\(https://rsp.wisc.edu/policies/\)](https://rsp.wisc.edu/policies/) The robust list includes everything from animal usage in research to VISA fees on application. There are numerous policies related to financial compliance of the grant mechanisms including cost sharing, effort reporting, cost transfer, financial conflict of interest, and more.

The policies and guidance adhere to Uniform Guidance.

2) University of Washington:

The University of Washington provides substantial policies, procedures, and guidance related to sponsored projects. The policies, procedures, and guidance are the most detailed list among all of the universities that were reviewed. (<https://www.washington.edu/research/policies/>) Notably the standard operating procedures are listed with the policies, as well as the guidance to help investigators determine if their projects are considered

research. The unique quality of their policies is that each include the purpose, background, persons or offices impacted, the procedures and guidance including things such as internal controls and internal audits, and any related resources. The university's policy process allows users to easily locate the policies, as well as how to adhere to these policies in a clear format. Notable fiscal policies include cost share, costing policy, effort reporting, and financial conflict of interest. The policies and guidance adhere to Uniform Guidance.

3) University of Utah

The University of Utah has a tab on their website that will lead the user to all policies related to grant administration. (<https://osp.utah.edu/policies/index.php>) Users choose from pages on policy and compliance, research handbook, procedure library, regulations library, and export controls. While at first the policies seemed extremely accessible, a user must search through multiple layers to find them. Instead of having a list or library of policies, guidance, and procedures readily available, users must click through multiple webpages to find relative grant management policies. For example, most of the policies can be found in chapters 3 through 9 of the research handbook. In the regulations library some policies are listed in part 7, however this is not a comprehensive list. The policies and guidance adhere to Uniform Guidance.

4) University of Minnesota

The Sponsored Projects Administration provides access to policies in two areas on their website: the proposals and the subaward sections. The

subaward tab leads to policies directly related to subawards, while the proposals section provides a link directly to the university policy library. (<https://research.umn.edu/units/spa/about-us/overview>) The policy types related to research are then categorized by clinical human research participants, grants management, research ethics and compliance, research health and safety, and technology and information security. There are links to specific policies as well as the accompanying procedures. The policies are easily accessible to users, researchers, and research administrators alike. It is important to note that there is a section specifically addressing uniform guidance on the website. The policies and guidance adhere to Uniform Guidance.

5) University of Kansas

The Office of Research at the University of Kansas provides a link to forms and policies. Within that section, a specific webpage provides the policies and guidance related to research. (<http://research.ku.edu/ku-research-policies>)

The University of Kansas has an extensive list with a unique contract arrangement with international sponsors' policy. This policy goes into detail regarding the language that the contracts must be in as well as what types of currency must be used for payments. Occasionally NIH will release funding announcements that call for international collaboration. Of interest is the policies at the University of Kansas list the review cycle that sponsored projects must follow. The University of Kansas provides users with well

thought out policies to support research administrators. The policies and guidance adhere to Uniform Guidance.

6) Indiana University-Purdue University Indianapolis

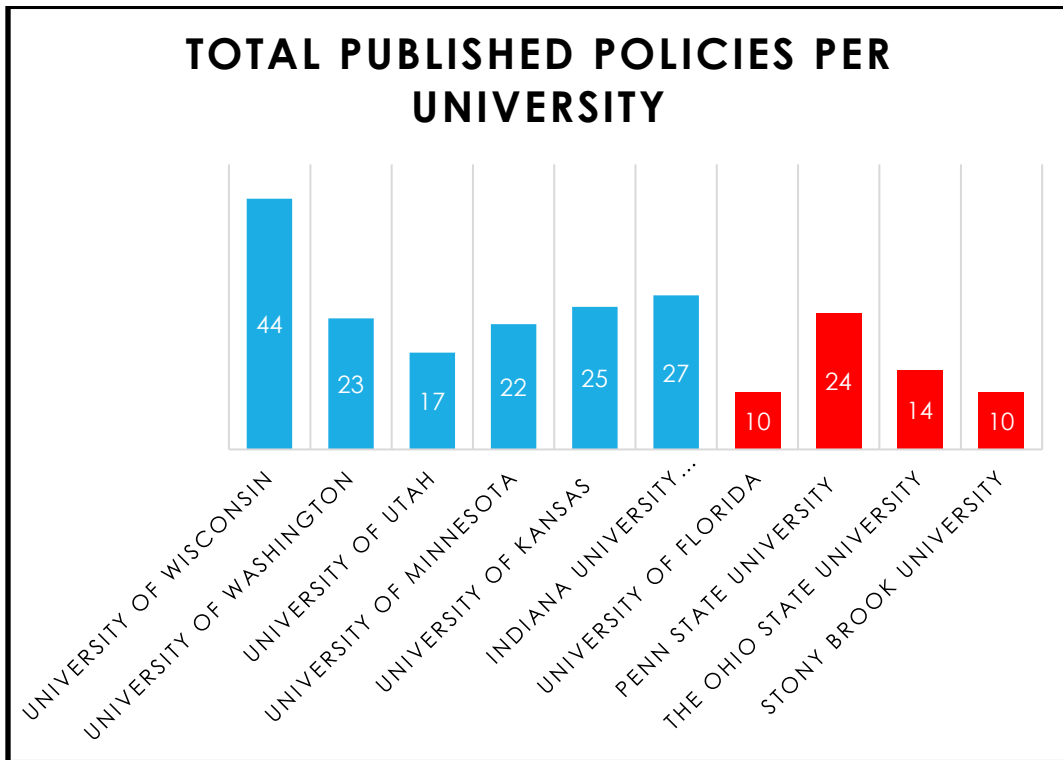
Indiana University- Purdue University Indianapolis is in a unique position, as this campus is an Indiana University campus that also offers Purdue University degrees. Research policies follow that of Indiana University. The policies are accessible through the research website of Indiana University. (<https://research.iu.edu/policies/index.html>) The research policies cover everything from financial compliance to reducing text messaging while driving and performing work under federal grant or contract. Each policy includes accompanying procedures within the policy itself and any other related policy. The policies and guidance adhere to Uniform Guidance.

Comparison of Policies

10 most utilized policies	10 least utilized policies
<ul style="list-style-type: none">• Animal Use/ Vertebrate Animals• Cost Sharing• Financial Conflict of Interest• Facilities and Administratral• Research Misconduct• Effort Reporting / Certification• Human Subjects• Intellectual Property• Gifts and Sponsored Pro.• Conflict of Commitment	<ul style="list-style-type: none">• Radiation Safety• Whistleblower• Tuition Remission• Radiation Safety• Transfer of Expenditures Between Budgets• Stipends• Stewardship of Sponsored Programs• Sponsored Programs Internal Controls• Salary Costs• Roles and Responsibilities Related to Single Audit

As seen in the comparison list above most of the research universities have policies related to cost sharing, effort reporting, human subject protections, intellectual

property, facilities & administration, and research misconduct. All of these policies play a vital role in the protection of research funding. However, the lack of clear and transparent policies related to audits, internal controls, and foreign affiliations should be of concern to university officials and funding agencies such as the NIH.



As shown by the graph above the universities without incidences of NIH fraud (highlighted in blue) in the last 10 years have more robust policies. As seen in the chart below these universities' policies are more accessible, more transparent, and user friendly. With the exception of Penn State and Ohio State the universities that have had incidences of fraud have policies that are harder to locate. Overall, the policies are somewhat consistent across the institutions however all institutions could benefit from increased policy to support the research administrators.

University Policy Characteristics

	Fraud				No Fraud					
	UF	PSU	OSU	SBU	UW-MAD	UW	U of U	U of M	KU	IUPUI
Accessible	N	Y	Y	N	Y	Y	N	Y	Y	Y
Transparent	N	Y	Y	N	Y	Y	Y	Y	Y	Y
User Friendly	N	Y	Y	N	Y	Y	N	Y	Y	Y

Recommendations

After a review of policies, guidance, and procedures of research universities that have not had known fraud on NIH grants in the last 10 years and those who have had known fraud, it is evident that both sets of institutions could benefit from some increased policy related to the lifecycle of the grants. While the policies are somewhat consistent across all of the research universities reviewed, as noted above, the lack of policy related to audits, internal controls and foreign affiliations is highly concerning.

Universities need to make policies clear and easily accessible and enable resources for the research administrators to follow through with financial audits, as well as overall audits of the research projects. With regular audits beyond just the single audits that are required for organizations who expend more than \$750,000 in federal funds per year, research organizations are making it less enticing for researchers to misuse funds or steal for personal use. These audits are crucial in identifying issues when they first become a problem rather than allowing them to continue for years due to lack of oversight.

Internal controls, especially related to grant management, need to be implemented and regularly reviewed to ensure that the controls are being utilized

properly. The Government Finance Officers Association suggests, “that governments have proper framework for internal control to ensure that:

1. These resources are being utilized effectively and efficiently;
2. Assets purchased or developed with them are being safeguarded properly;
3. Financial reporting required by these grants is accurate and timely; and
4. Grant resources are being utilized in compliance with appropriate laws and regulations,” (Government Finance Officers Association, 2015).

The same framework should be utilized for research universities. The internal controls associated need to take into consideration the control environment, risk assessment, control activities, information and communication, and monitoring (Government Finance Officers Association, 2015).

As seen in the fraud cases at the University of Florida and The Ohio State University, fraud committed on behalf of foreign governments have put federal grant monies at risk. Research universities need to have policies that follow the NIH guidelines of reporting foreign affiliations. These policies will help to protect federal monies by making it mandatory to report at the university level and allow research administrators to track and report if there is suspicion of wrongdoing. This is not to say that all foreign affiliations are corrupt, but allows the researcher to be transparent. This step is to ensure that federal government money is being used for its intended purpose and not to further the research of a government that may not have pure intentions.

Conclusion

Overall, research administrators need to be empowered to enforce uniform guidance and the specific policies of the grant mechanism. The role of the research administrator is to protect federal monies by providing oversight, compliance, and ensuring adherence of the terms of the grant award that was accepted by the researcher. The research administrator is in a unique position as they are protecting federal monies, the research university that they serve, and the researcher. The research universities need to take the steps to encourage and empower research administrators to provide proper oversight throughout the grant lifecycle. Without proper policies and procedures in place, research administrators may be reluctant to enforce a researcher to be compliant.

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Appendix I – Matrix

Due to accessibility of the policies, some were unable to be located, and may have been missed in the matrix below. Also of note, while all of the universities' policies met Uniform Guidance only The University of Kansas was the only university who had a specific policy for Uniform Guidance.

Breakdown of University Policies

	University of Wisconsin	University of Washington	University of Utah	University of Minnesota	University of Kansas	Indiana University Purdue University Indianapolis	University of Florida	Penn State University	The Ohio State University	Stony Brook University
Acceptance of Sponsored Program Awards and Fiscal Compliance		X								
Adjunct Research Appointments					X					
Advance Monitoring		X								
Animal Use/ Vertebrate Animals	X	X		X	X	X		X	X	X
Annual Investigator Outside Activities Reporting	X									
Anti- Trafficking						X				
Audit								X		
Authorship			X							
CarryOver							X			
Change in Effort of Status of PI or Other Key Personnel						X				
Classification of External Support - Sponsored Program or Gift		X								
Closeout		X								
Contracting with International Sponsors					X					
Consultant Costs									X	
Compensation Limitation	X									
Computer Software Ownership	X									
Conflict of Commitment	X					X			X	X
Copyright	X		X	X	X					
Cost Accounting					X					X

Cost Management								X		
Costing Policy		X					X			
Cost Sharing	X	X	X	X	X	X		X	X	
Cost Transfer	X		X		X	X				
Cross Unit Grant Expenditures	X									
Competitions for Institutional Nominations	X									
Differentiating Direct Cost and Indirect Costs					X					
Direct Charging of Administrative and Clerical Salaries	X					X	X			
Direct Cost				X					X	
Disclosure of Other Support	X						X			
Documenting Financial/Accounting Transactions				X						
Dual Use of Research Concern						X		X		X
Effort Reporting / Certification	X	X	X	X	X	X				
Establishment of Accounts			X							
Export Control	X			X						
External IRB		X								X
Facilities and Administration		X		X	X	X	X	X	X	
Fetal Tissue/ Embryonic Stem Cell Research	X	X		X				X		
Finalization and Closeout								X		
Financial Administration of Extramural Support	X					X				
Financial Conflict of Interest	X	X	X	X	X			X	X	X
Financial Transaction Approvals and Routing				X		X				
Fixed Price Agreement				X	X		X			
For-Cause Investigations Related to Research Compliance				X						
Fringe Benefit Rates		X								X
Gifts and Sponsored Project	X				X	X		X	X	
Gifts in Kind	X									
Hazardous Biological Agents				X				X		
Harassment Reporting	X									
Human Subjects	X	X			X	X		X		X
Human Subject Payments				X	X			X		
IACUC			X							
Independent Contractor										X
Indirect Cost	X									
Indirect Cost Exceptions	X									
Intellectual Property	X	X		X	X	X		X		
Internal Audit			X							

Internal Controls			X							
Internal Deadlines		X				X				
IRB		X	X			X			X	
Kickback Policy			X							
Managing Capital Equipment				X						
Mandatory Disclosure of Violations of Criminal Law	X									
Material Transfers	X									
Monitoring/Oversight of Grant/ Contract Accounts	X									
Multi PI							X			
No Cost Extension					X		X			
Non- Personnel Costs								X		
Overdrafts, Bad Debt, Audit Disallowances	X					X				
Overhead			X							
Participant Support Costs	X				X			X		
Pay Schedules in Relation to Award Begin and End Dates	X									
Personnel Costs								X		
Prior Approval for Exceptional Expenditures	X									
Procurement					X					
Program Income				x	X	X		X		
Proposal Approval							X			
Proposal Policy							X			
Publication Cost						X				
External Auditor Interactions	X									
Patents & Inventions			X							
Public Access Compliance	X			X	X					
Radiation Safety										
Record Retention				X						
Research Data		X							X	
Research Misconduct	X	X	X	X	X	X			X	
Residual Income						X				
Responsible Conduct of Research	X			X				X		X
Restricted Research					X					
Required Approvals for Collaborative Projects	X									
Roles and Responsibilities Related to Single Audit	X									
Salary Cap						X		X		
Salary Costs									X	
Signature Authority	X					X				

Sponsored Programs Internal Controls	X										
Stewardship of Sponsored Programs								X			
Stipends			X								
Subagreements	X									X	
Subawards	X	X						X			
Submission Requirements		X						X			
Subrecipient Monitoring		X				X		X			
Transfer of Expenditures Between Budgets		X									
Travel	X		X								
Tuition					X						X
Tuition Remission	X										
Uniform Guidance					X						
VISA	X					X					
Whistleblower						X					
Total Policy Count	44	23	17	22	25	27	10	24	14	10	

Appendix II- IRB Process

The Institutional Review Board (IRB) is tasked with protecting and managing risks of human subjects who participate in research. In other words, the IRB is a level of protection. The IRB is required to review and approve research activities that include surveys, record reviews, outcomes research, and clinical trials (Office of Research Integrity). The IRB is critical to research as it the governing body that protects study participants from the harm that research has the potential to do, specifically those in vulnerable populations such as prisoners, patients without mental cognition to make their own decisions, or a population that could be hurt by participating in research.

Initially, my research was going to include interviews of research administrators currently working in the field. I actually initiated the IRB process as if the administrators would be interviewed, but later removed that portion due to the abundance of data collected from publicly available sources. I was concerned, if the research administrators thought their names could be associated with their interviews, they would not want to participate. Overall, it was a good decision to remove that portion due to time constraints and the risk that the research administrators would have endured if their opinions were found out by their employers.

Once I removed the interview portion from the project, there was no longer a human aspect to my project. The IRB deemed my project as not human subject research. The role of the IRB is to look out for those who are participating in the research and make sure it is for their best interest.



XX

IRB Number:
70151

TO: Megan Eder
Martin School of Public Administration
PI phone #: 5023386014
PI E-mail: megan.eder@uky.edu

FROM: Chairperson/Vice Chairperson/Office of Research Integrity
Nonmedical Institutional Review Board (IRB)

SUBJECT: IRB Review

DATE: 6/24/2021

On 6/23/2021, a designated official reviewed your proposal entitled:

Evaluating the Role of the Research Administrators and Public Research Universities Policies in Protecting Federal Grant Money

The designated official determined that your proposal does not meet the federal definition of human subjects, "a living individual about whom an investigator conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information" [45 CFR 46.102(f)], and thus does not need IRB review.

OR

The designated official determined that your proposal does not meet the federal definition of research, "a systematic investigation designed to develop or contribute to generalizable knowledge" [45 CFR 46.102(d)] and thus does not need IRB review.

The designated official made this determination based on the information provided in the Not Human Subjects Research (NHR) form, (and subsequent conversations with you). You are obtaining de-identified samples/information. You do not have access to personal identifiers and will not be provided with a code enabling re-identification of subjects. There is not a collaborator on the protocol with access to identifiers.

OR

The designated official made this determination based on the information provided in the Not Human Subjects Research (NHR) form, (and subsequent conversations with you). Your proposal will not contribute to generalizable knowledge because the proposal does not yield novel ideas AND/OR the proposal will not yield information that is shared outside UK.

Should any facts change please contact ORI as that may render the protocol eligible for IRB review and approval.

If you have any questions regarding the designated official's decision or need additional information, please contact the Office of Research Integrity at 859-257-9084.