INTRODUCTION

At the request of Dr. Bette Bergeron, Provost at the State University of New York – Potsdam (SUNY Potsdam), I was asked to review the current operations of the Office of Research and Sponsored Programs (RSPO) and other affiliated programs, including but not limited to the Institutional Review Board (IRB) and the Institutional Animal Care and Use Committee (IACUC). I was also asked to consider the organizational reporting structure of these units.

Two days were spent on campus meeting with various constituent groups or individuals. Included in these meetings were the Director of the RSPO, Dr. Nancy Dodge-Reyome, the SRPO staff, the Provost’s Cabinet, Library Faculty and Staff, the IRB, IACUC, the Graduate and Continuing Education Director and Staff, the staff of the Center for Creative Instruction (CCI), Ms. Jenica Rogers in her role as Director of the Center for Applied Learning (CAL), which houses the Student Research Program, and the Faculty Senate Executive Committee. In addition to these formal groups, or the leadership of certain offices, individual meetings were held with the Chief Financial Officer, a member of the Foundation Office, and a member of the faculty who requested time with me. Finally, a number of meetings were held with faculty, including three general meetings open to all faculty, two meetings specifically for new faculty, that is faculty hired within the past two years, and a meeting with high-end users of RSPO.

This report is in three sections: 1) Review of the Office of Research and Sponsored Programs and Recommendations; 2) Review of the Research Protection Committees (IRB and IACUC) and Recommendations; and 3) General Issues and Recommendations not discussed elsewhere.

OFFICE OF RESEARCH AND SPONSORED PROGRAMS: REVIEW

The Office of Research and Sponsored Programs Office has responsibility for assisting faculty and staff with the identification of potential granting sources, assistance with pre-award activities including assistance with grant writing, budget preparation and submission of the grant to the appropriate funding agency. The office also is responsible for post-award activities, including assistance with managing expenditures, which requires the office to maintain a relationship with the SUNY Research Foundation, an independent entity affiliated with the SUNY system, that serves as the financial management agency for grants awarded to
SUNY institutions. As an independent entity, the Research Foundation currently charges a fee of approximately 50% of Fixed and Administrative (F&A) dollars, often referred to as indirect costs, for the services provided to the institution with the remaining F&A dollars sent back to the University where the research or sponsored program is being conducted. This current reimbursement rate results in a return to the University of somewhere in the neighborhood of $100,000 annually. It is important to note that this funding formula is in the process of being significantly altered so that within the next year the Research Foundation will retain approximately 90% of F&A dollars, with only 10% of F&A being returned to the University. This change will result in an annual reimbursement to the University of something closer to $10,000. This change, as noted by both the RSPO Director, and the Chief Financial Officer, will have a significant impact on the ability of the office to operate effectively since one full-time staff person’s salary has been until this point paid for by the F&A dollars returned to the University.

RSPO is currently comprised of a Director and three staff. The Director of the Office is a longstanding member of the faculty who has been assigned as the Director for several years. The Director provides general oversight for the office, conducts occasional seminars to provide information to faculty about seeking grants, assists faculty and the institution with the preparation of grant proposals and participates in the work of the two research oversight committees. The Associate Director assists faculty with grant proposals and handles post-award work. The other full-time staff person provides critical assistance with post-award activities including assistance with purchases made on behalf of the projects, as well as assistance with any payroll activities associated with the project. Finally, there is a full-time clerical staff person who provides support for the office and for the two research oversight committees. The current Director has announced that she will return to the faculty at the beginning of next Academic Year. It is also worth noting that the two of the remaining staff persons are also at or near retirement eligibility. Thus, it is possible that this office may find itself undergoing significant staffing transition in the not too distant future.

RSPO is currently housed in an office suite in a location that might best be described as off the beaten-path of the University on the second floor of Satterlee Hall. Both staff and faculty commented on the location as being an inhibition to seeking out the office, and my own observation also suggests that this location may work to the detriment of the unit’s ability to function as effectively as it might. All parties interviewed generally had positive reports about RSPO and its post-award activity. Both faculty and administrators felt that all elements of the post-award process were well maintained. Purchase requests are quickly processed and payroll requests are submitted in a timely fashion. Required reports are also produced in a timely fashion to ensure that funding streams are maintained.
However, pre-award activities were generally seen as lacking. This was highlighted most starkly by interviews with recently hired faculty who were unclear as to what services the office provided or how to access those services. This is in spite of the fact that information is provided by the office during the new faculty seminar. It is likely that information about the office gets lost in the myriad of information presented to new faculty at that time. This lack of knowledge about the office and its functions is likely compounded by what is generally described by the faculty as a lack of sufficient outreach by the office to engage faculty around grant seeking opportunities. Faculty and administrators both noted that the office conducts few training opportunities for either new or experienced faculty around grant opportunities. They also noted that there is no mechanism in place for informing faculty of possible grant opportunities that might be of interest to them. Several faculty members noted that at one time a list was maintained with faculty research interests, but that mechanism for identifying faculty research interests had fallen by the wayside. While faculty acknowledged that the office provided good support around budget preparation, they also noted that there is a lack of grant-writing support in terms of assistance with helping to get the science and other required elements into the required formats for submission. They noted that no “boiler-plate” language is readily available in an accessible place and format to be easily edited and entered into a grant application. While faculty recognize that they are responsible for developing the science of the research or creative activity, they note that no supports are provided with helping to ensure that the writing associated with the grant application is succinct and well-edited. Faculty specifically noted that other universities in the area, both Clarkson and SUNY Canton, provide specific grant writing support and expressed a desire to see the RSPO provide similar support.

A final area of concern is expressed as a lack of collaboration between the RSPO and other units on campus that might be able to provide benefit to or derive benefit from a collaborative relationship. One unit that falls into this category is the Center for Creative Instruction (CCI) which might be a valuable collaborator in developing tutorials and other professional development activities that would help faculty prepare for and engage in grant writing activity. A second unit that falls into this category is the Center for Applied Learning (CAL) and particularly the Center for Student Research. While the RSPO and CAL do have a working relationship around the annual “Student Learning and Research Fair,” other opportunities for collaboration are not utilized. One opportunity that was specifically noted was a system by which the Center for Student Research might be notified when a grant or sponsored program is seeking a student worker or research assistant. This would provide a readily available opportunity to link students with faculty and their research.
Both faculty and RSPO staff do agree that some of the current difficulty around the lack of submitted grants and other sponsored program applications is in the perceived mixed message concerning the importance of research and creative activity to the University. While each group frames the concern somewhat differently, the concern can be reduced to a lack of any clear reward accruing to the faculty member for submitting or receiving a grant. Faculty see little or no benefit toward tenure and promotion in submitting or receiving a grant. Nor do they see any way to obtain a monetary benefit from obtaining a grant, such as a reduced teaching load, summer salary or additional pay for additional work.

OFFICE OF RESEARCH AND SPONSORED PROGRAMS: RECOMMENDATIONS

1. With the announced departure of the current Director of RSPO, immediate attention should be paid to conducting a search for a new permanent director for the Office. The search should be conducted so that the new director is in place by the beginning of Academic Year 2017 – 2018.

2. Consideration should be given when developing the position description for the next director to seeking a grants professional. The next director should have experience in working in a medium to large size Grants Office. This person should have an understanding of both pre- and post-award activities. Additionally, the next director should have expertise in providing professional development to faculty in identifying appropriate grant opportunities, and in helping faculty, particularly tenure-earning faculty, develop the skills needed to submit grants.

3. The next director should have a clear understanding of the various granting agencies, particularly at the federal level, with a history of working with those agencies, in order to arrange for professional development seminars hosted by those agencies for faculty.

4. Every effort should be made to reestablish a mechanism for informing faculty of potential research or sponsored program opportunities in keeping with the faculty member’s interests. In lieu of establishing an internal system, the University may wish to consider joining ProQuest’s PIVOT program, what was formerly known as the Community of Science. This program provides the faculty member with the opportunity to build an accessible Curriculum Vitae, a list of research interests, and provides the faculty member with notifications about potential funding opportunities in those areas of interest.

5. If possible, the next director should have a strong understanding of the operations of the SUNY Research Foundation.
6. Consideration should be given to hiring, initially on a part-time basis, a person with expertise in grant writing.

7. RSPO should consider developing a series of easily accessible “boiler-plate,” descriptions of elements of the University that are often required by funding agencies, included in these descriptions, but not limited to them, should be information about the general physical plant, laboratory space both for human subject and animal subject research, the library and its holdings, information about and the University’s relationship to the SUNY Research Foundation, and other community resources.

8. If not already available, RSPO should consider developing a series of fillable forms that would aid in obtaining signatures as grant applications are processed. Additionally, the development of a common budgeting spreadsheet should be considered. Appropriately developed such an aid would allow faculty to quickly develop a budget that would take into consideration fringe rates, as well as F&A costs based on either agreed to rates for federal agencies or the rates set by other external funding sources.

9. Attention should be given to the ability of the next director to work collaboratively with other units within the University that could aid in providing training to faculty, CCI for instance, or in providing staff for faculty research through the Center for Student Research.

10. Continued support for the post awards process should be maintained. As staff from this office choose to retire, attention should be paid to replacing them with individuals with expertise that matches or exceeds the current levels of professionalism exhibited by these staff.

11. Senior Academic Administration and Faculty Leadership should consider engaging in a discussion concerning the role of research, scholarship, and creative activity in the tenure and promotion process. Particular attention should be paid to being more specific about how these activities will be factored into the process. Furthermore, every attempt should be made to maintain consistency around the impact of these activities on the process.

12. Senior Academic Administration and Faculty Leadership should engage in a discussion about incentives that could be provided to faculty who engage in seeking funding and who receive funding. While incentives need to fit within what is acceptable within the SUNY system, consideration should be given to
ensuring that grant applications include funding for faculty time that the faculty member could use to either buy-out from teaching a course, or provide additional income to the faculty member for the additional time that the faculty member would be devoting to the grant or sponsored program activity.

13. Consideration should be given to determining whether the new proposed business model for disbursement of F&A dollars by the SUNY Research Foundation is in the best interest of all parties. Depending on the conclusion reached the Presidents of the Comprehensive Universities might want to negotiate with the Research Foundation about reconsidering the new distribution model and modifying it in a way that remains advantageous to the Comprehensive Universities to encourage faculty to seek outside funding.

RESEARCH PROTECTION COMMITTEES: REVIEW

SUNY Potsdam operates two Research Protection Committees, an Institutional Review Board (IRB), charged with reviewing research that engages human subject participants, and an Institutional Animal Care and Use Committee (IACUC), which addresses research involving vertebrate animals. Until recently, both committees where chaired by a part-time staff person in RSPO who is an attorney. While this type of committee leadership is unusual, it is not entirely unheard of within the academy. What was unusual was that the same person chaired both committees. With discussion taking place at the senior administration level of not renewing that position, the staff member made the decision to leave the University. Currently each committee is chaired by a faculty member, has the requisite external member on the committee, and in the case of the IACUC, has the required veterinarian. Support for the committees, including the provision of appropriate training for members of the faculty in either human research or animal research protections, is provided by RSPO and maintenance of records is provided by the RSPO Secretary.

The inclusion of the Director of RSPO on these committees in an ex officio capacity is unusual. The majority of institutions with which I am familiar are adamant about maintaining a separation between the office responsible for seeking and obtaining external funding and the office responsible for oversight of research protection activities in order to avoid any actual or perceived conflict of interest. It was unclear to me as to whether the Director of RSPO also as serves as the Institutional compliance and accountability officer, or whether this responsibility resides with another senior administrator which is generally the case.

While there is a minimal amount of animal research taking place on campus, there is a reasonable amount of in situ animal research occurring at the University.
IACUC clearly understands its responsibilities. There is a reasonable amount of human subject research occurring on campus and as with IACUC, IRB clearly understands its responsibilities around human subject’s protections.

Discussions with the committees provided information about current makeup of the committee and a sense of the level of research occurring in each area for which the particular committee is responsible. Both committees did note, with some concern, a drop off in the number applications for review. Members also noted, and this was later confirmed in discussions with faculty, that some of this reduction in applications is the result of faculty choosing to work with colleagues at other institutions. These institutions are perceived as being less cumbersome and more judicious in the processing of applications and the required materials that must be submitted with the application.

The level of bureaucracy was the most consistent issue raised in meetings with faculty. They indicated that forms were cumbersome, that reviews seemed to take an inordinate amount of time to complete, that requests for additional materials or requirements were often inflexible even when information was provided that suggested that meeting the request was either not possible or suggested a lack of understanding of the nature of a specific project. Additionally, faculty perceive the committees or the administrator responsible for coordinating these committees as expanding the purview of the committee, either the IRB or IACUC, into areas that are beyond the scope of those committees as defined in the appropriate elements of the Code of Federal Regulations (CFR’s) and other documents related to the operations of these committees.

Faculty were clear that this perceived inflexible bureaucracy was a factor in the reduction in both grant-seeking activity and the reduction in applications for either IRB or IACUC review. Faculty were not shy about indicating that it was simpler to work with colleagues either in other near-by SUNY institutions or other near-by Universities were research protection review was seen as more expeditious. This is problematic for SUNY Potsdam in several areas. If the grant itself is being operated out of another university, that university derives the F&A costs. SUNY Potsdam is also left without the ability to effectively publicize the research, since as is true in other institutions where this end-around takes place, the research is often being done without formally informing the University about the faculty member’s engagement in the research activity. It further has the potential to open up the university for negative publicity should something untoward happen with the research and the faculty member’s affiliation with SUNY Potsdam comes to light.

The issues described here are not unusual. In my discussions with various groups all agree that there is a balance that needs to be accomplished with providing appropriate research protections and reasonable demands about the level of...
information and oversight that should be provided. The difficulty arises in that where that balance lies is seen differently by RSPO and by the faculty, with the committees themselves currently more aligned with the faculty perspective than was previously the case when the chair was a member of the RSPO staff.

**Research Protection Committees: Recommendations**

1. The University should consider the establishment of an independent Office of Research Protections. A part-time director from the faculty conducting research either with human or animal subjects should be identified and appointed. Appropriate reduction in teaching load should be provided. Experience in other comprehensive institutions suggests that about 1.5 credit load hours per semester should be sufficient for this person to fulfill the coordination functions. The director’s responsibilities should include, but not necessarily be limited to, being the contact person if there is any apparent violation of research protection protocols, coordination of training around either human subjects or animal subject research, convening where appropriate investigations in violations of either human subject or animal subject regulations or approved protocols. Clerical support could still be provided by the Secretary in the RSPO Office with the clear understanding that Research Protection issues are directed to and discussed with the Director of the Office of Research Protections.

2. The University should consider the establishment of a Research Misconduct Committee. This committee can be chaired by the Director of the Office of Research Protections and can be small. Two additional faculty members, one from each area of research, human subjects and animal subjects, is usually adequate. This committee would be responsible for conducting investigations into any reported violations of either human or animal subject regulations or approved research protocols. The committee would also have the authority to make initial recommendations to the institutional compliance officer as to appropriate actions to take if the committee’s investigation concludes there has been a violation.

3. The University should clearly designate who the institutional compliance officer is from senior administration within the Office of Academic Affairs. This person would serve as the principal administrator for ensuring compliance with human subject and animal subject regulations. This person would also serve as the person to whom the Director of the Office of Research Protection, as well as, the IRB and IACUC chairs would report, the responsible agent for reviewing any misconduct investigations, determining whether there was a violation under the appropriate CFR’s, fixing the
appropriate action in the event of a violation, and if needed notifying the appropriate federal office of any violation requiring notification.

4. The Office of Research Protection should assume responsibility for providing for and oversite of faculty development activities that are essential for the performance of either human subject or animal subject research. Such professional development is already provided through RSPO for human subjects and should continue through this new office. If not already provided similar on-line training should be provided to faculty conducting animal subject research.

5. The Director of RSPO should not sit as a member of either the IRB or the IACUC, nor should the Director of the Office of Research Protection.

6. Both the IRB and IACUC should consider reviewing and modernizing their protocols and procedure. This review should include other members of faculty who engage in either human subjects or animal subjects research. One critical element that should be included in the protocols is a clear timeline concerning when those filing for review will receive an initial notification that their application has been received, and the maximum time that will transpire the applicant receives initial notification on the research protocol submitted and what other forms and information need to be submitted.

7. Both the IRB and IACUC should review their current application forms for research review. Every attempt should be made to streamline these forms. They should be available on-line, to the greatest degree possible fillable forms and the application should be able to be electronically submitted. In the case of the IRB some consideration should be given to a form that allows for initial determination about the level of review required, and then additional forms that might be required for either expedited or full review.

8. Every attempt should be made to move from paper storage of IRB and IACUC documents to digital storage of these documents. This should begin with new protocols, and would be easily accomplished if applications can be electronically submitted. In addition, a flexible timeline for converting current paper documents into digital documents should also be developed.

9. Every attempt should be made to encourage faculty to use the local IRB and IACUC committees and to operate any research or sponsored project both for the benefit of the University and for the benefit of the faculty member.
GENERAL ISSUES: REVIEW

In addition to the two specific issues discussed previously, i.e., RSPO and the Research Protection Committees, I was also asked to review the general organizational structure of these two units. I have already addressed a possible organizational restructuring of the Research Protection Committees. This leaves some discussion of whether the organizational structure should be changed for the RSPO. As part of the consideration of an organizational restructuring of RSPO, I spent time with several other units on campus to determine whether amalgamating RSPO into one of these offices might be appropriate. Among the Offices that were visited were the Office of Graduate Studies and Continuing Education, the Center for Creative Instruction, and the Center for Applied Learning.

I also considered the physical space in which RSPO is currently located and its potential impact on the effectiveness of that unit. Additionally, when considering the organizational structure for RSPO, I took into consideration the changing business model around reimbursement of F&A costs from the SUNY Research Foundation.

GENERAL ISSUES: RECOMMENDATIONS

1. It is my recommendation that RSPO remain an independent unit reporting directly either to the Provost or the senior academic administrator serving as the institutional research compliance officer. Merging this unit with another unit will only obscure its function and downgrade its centrality to the research development and implementation process. Moreover, merging this unit with another unit would not seem appropriate either because the other unit does not have a person with expertise in research and sponsored programs development and management, or the current leadership of the other unit already has sufficient responsibility that the addition of an additional unit would likely mean that RSPO would be under resourced.

2. Consideration should be given to finding a new location for the RSPO. Its current location is, as I have noted elsewhere, off the beaten path, and I believe contributes to the lack of engagement with the office. Thought should be given to moving the office back to Raymond Hall. Location in the primary administration building would reinforce the importance of this office in the research and sponsored programs endeavor. It might also convey an additional message to faculty about the importance of research and sponsored programs as part of the overall responsibility of faculty.

3. Given the changing business model for F&A reimbursement, Administration might wish to consider consolidating RSPO operations with SUNY Canton. It
seems entirely plausible that a combined office would be able to provide the current levels of service being provided by each institution independently while simultaneously expanding on those services in a manner that would reduce the cost burden on both institutions. Since there are already some shared services developing RSPO as a shared service should be eminently accomplishable.

4. Similarly, given the levels of research activity and my recommendation for an Office of Research Protection, this office, the Committee on Research Misconduct, and both institutions IRB and IACUC committees might also become a shared service. This could lead to increased efficiency for both institutions as well as a reduction in total service activity required to operate this office and research protection committees.

**CONCLUSION**

This report has reviewed the operations of the Office of Research and Sponsored Programs, the Research Protection Committees, and some general organizational structure issues related to these two units. Thirteen recommendations are offered that this consultant believes would improve the functioning of the Office of Research and Sponsored Programs, nine recommendations are offered to improve the functioning of the Research Protection Committees, and four recommendations are offered to improve the general organizational structure and effectiveness of these two units.