Office of Sponsored Programs

The mission of the Office of Sponsored Programs (OSP) is to assist the MIT research community in securing sponsored research funding that is consistent with the mission and goals of the Institute, to provide information on and assistance in managing sponsored research funding, to provide the proper stewardship of research funds that satisfies both the sponsor and the Institute, and to advocate for MIT research to outside entities. Primary functions of the office are:

- Proposal review to ensure adherence to sponsor requirements and compliance with Institute and sponsor policies
- Review and negotiation of agreements, including outgoing subawards, to ensure consistency with the Institute's corporate charter and status as a tax-exempt educational institution and compliance with Institute academic and research policies, such as those relating to freedom to disseminate research results; access for all foreign faculty, staff, and students to MIT's educational and research activities; control of intellectual property; and full cost reimbursement
- Postaward administration to provide assistance to departments, labs, and centers (DLCs) in meeting MIT and sponsor requirements
- Calculation, audit defense, and negotiation of MIT's facilities and administrative (F&A) and employee benefit rates

Research Volume

MIT's total research volume (expenditures) for FY2008, excluding Lincoln Laboratory, was $643 million, which represents an increase of 7.48% over FY2007. The volume breakdown by major sponsor is shown in the table on the following page.

Challenges and Accomplishments

Staffing and Organization

The primary accomplishment of FY2007 was getting members of the senior leadership team hired and settled into their new roles. In addition, there have been a number of other changes in the staff as a result of changes in the direction of the office, retirements, the very competitive local market for experienced research administrators, and other miscellaneous circumstances.

We have begun to evaluate OSP's staffing levels and organizational structure to determine whether they meet our current needs. In the Boston/Cambridge market, a large number of universities and hospitals compete for skilled people with experience in managing sponsored research funds. As a result, it is unlikely that OSP will maintain the kind of long-term staff that once held the large majority of the positions in the office. At the same time, the complexity of the positions has increased as a consequence of more stringent federal regulations and the advent of systems such as Grants.gov that call for electronic interfaces for doing business with the government. The senior leadership team and the OSP director are looking at alternative service models for the grant and

Research Expenditures by Sponsor (in thousands of dollars), FY2004–FY2008

	FY 2004		FY2005		FY2006		FY2007		FY2008	
	Original source	Proximate sponsor	Original source	Proximate sponsor	Original source	Proximate sponsor	Original source	Proximate sponsor	Original source	Proximate sponsor
Federal										
DHHS	159,029	141,015	180,682	162,170	195,573	174,171	201,557	177,175	226,307	198,205
DOE	69,183	63,936	69,927	62,722	67,265	60,179	64,741	55,990	64,889	57,239
DOD	86,811	61,146	85,866	54,403	89,535	54,196	90,571	57,113	87,370	55,526
NSF	65,443	54,406	66,686	56,206	65,040	54,412	65,057	52,006	64,973	51,120
NASA	31,442	21,949	32,170	19,258	31,229	19,405	27,889	16,536	25,479	14,923
Other	12,250	10,765	12,267	10,164	15,709	11,569	14,589	12,026	14,891	12,715
Subtotal	424,158	353,217	447,598	364,923	464,351	373,932	464,404	370,846	483,909	389,728
Nonfederal										
Industry	68,038	82,895	47,196	69,789	73,179	99,712	75,190	99,771	79,016	100,285
Nonprofit	27,112	78,744	50,409	110,442	28,306	86,015	37,590	99,934	50,909	117,469
Other	14,661	19,113	22,221	22,270	21,660	27,837	21,084	27,717	29,209	35,561
Subtotal	109,811	180,752	119,826	202,501	123,145	213,564	133,864	227,422	159134	253,315
Total	**533,969**	**533,969**	**567,424**	**567,424**	**587,496**	**587,496**	**598,268**	**598,268**	**643,043**	**643,043**

Note: Original source funding includes expenditures by MIT on awards directly from US government agencies along with expenditures from awards that come to MIT via subawards from industry or another university or institution. Proximate source expenditures are based on the entity that actually made the award to MIT.

contact administration team to determine how best to maintain good service to the DLC community in the current environment. Alison Alden and her team in Human Resources have been helpful in thinking through some options for handling this challenge.

Electronic Research Administration and Proposal Processing

Grants.gov and Coeus

Like other sponsored research offices in the country, OSP has been trying to help the campus comply with the government's move toward e-commerce (particularly the submission of proposals via Grants.gov). We have convinced a significant proportion of the campus to use Coeus for the submission of grant proposals, particularly to the National Institutes of Health (NIH). One of the problems with Grants.gov is that each sponsoring agency can layer its own proposal submission requirement into the process, thereby making the submission process nonstandard and complex. To combat this, the Electronic Research Administration team programmed many of these requirements into Coeus via a presubmission verification, which has resulted in a significantly lower error rate. Last fall OSP tracked an error rate of about 11% as compared with the national average of 67% reported by NIH.

This convinced us to refocus and reenergize our implementation of Coeus for all proposal submissions. This project is under way and is one of three primary goals for the office over the next two years. To this end, we developed a comprehensive proposal development training curriculum with the assistance of Information Services and Technology, including classroom teaching with a professional instructor and revision of

the proposal development instructional manual with the assistance of a technical writer. In both cases, we benefited enormously from a dedicated professional writer (Linda Dube) and a trainer (Carole Trainor). These initiatives were launched in May.

Five-Day Proposal Review Rule

To enable adequate time for review of these electronic proposals not only to NIH but to other federal sponsors, units representing the School of Science and the vice president for research implemented additional measures to ensure compliance with MIT's five-day advance review of proposals. These measures included seeking approval from the dean for proposals submitted with less than five days for review and submission. The schools of Engineering, Architecture and Planning, and Humanities, Arts, and Social Sciences, as well as the Sloan School of Management, adopted similar measures in early fall 2008.

Research Administration Improvement Initiative

The Research Administration Improvement Initiative (RAII) is winding down, with many of the projects nearing completion. There were several notable accomplishments this year.

The online training program STARweb was launched in fall 2007, and quickly taken up as required training for MIT staff members in central offices (e.g., OSP, Audit Division, Office of Cost Analysis) and the departments, labs, and centers that manage sponsored research funding at MIT. Some 552 staff have been trained using this tool over last year.

Several projects will be turned over to OSP and the Office of the Vice President for Research to complete, including recommendations for a research administration certification program (coursework and curriculum), an outline for a resource geared toward principal investigators (PIs), development of the content and structure for a new PI orientation framework, and a PI quick guide to the "top 10" topics that PIs need to focus on in managing their research.

Overall, RAII has been a great success, with a significant amount of work being done by numerous MIT staff on a voluntary basis. The tools and resources developed by RAII are available on the OSP website for use by the campus.

Going forward, OSP will formulate a Research Administration Advisory Committee as a standing group of key members of the campus to advise on OSP priorities. The vice president for research and the vice president for finance will act as cosponsors for the committee. The membership and chair will be identified in the fall, with the first meeting planned for the winter.

Costing Issues

On June 11, 2008, the Office of Cost Analysis, under the leadership of John Donahue, concluded negotiations with the Office of Naval Research (ONR) regarding MIT's FY2009 F&A forward pricing rates. Rates were granted, as proposed, at 68.0% on-campus and 7.5% off-campus. In addition, MIT and ONR agreed that the Institute would have the ability to recover the full carry-forward from prior years ($44 million) over the

next three years. Our current estimate is that we will earn back as much as $6 million in FY2009; however, the carry-forward has been fully reserved on the MIT books in the event we are unable to recover any of the $44 million through the usual rate process.

National Policy Impacting Research Activities

Conflict of Interest

The federal government, specifically NIH and the National Science Foundation, is increasing its oversight efforts related to financial conflicts of interest in research. We anticipate a policy change from NIH over the next year that will alter the way institutions evaluate and manage conflicts of interest. While MIT has been shielded from some of this scrutiny because the Institute does not have a medical school, NIH is still the primary funder of our research and therefore will continue to set the standard by which many sponsoring agencies set policies.

In the meantime, MIT has been evaluating the means by which it collects financial disclosure information and monitors financial relationships. We made some minor modifications to Coeus for the most recent data collection process related to annual disclosures. We are seeing improvement in the amount of information that we are collecting, but additional changes will be necessary to ensure a complete disclosure and review process.

The provost's office has formed an ad hoc faculty committee, under the leadership of Sheila Widnall, to review MIT's polices and procedures in managing conflicts of interest, particularly in the current environment where faculty members start businesses to further develop technologies discovered in basic and applied research at MIT. This committee will be looking at government regulations as well, to make recommendations about how MIT can manage its individual and institutional conflicts of interest to ensure objectivity and integrity in the Institute's research.

Code of Business Conduct

Recent amendments to the Federal Acquisition Regulation include a requirement for a code of business conduct and ethics to be provided to staff involved in research contracts in excess of $5 million. A working group comprising representatives of the Office of the General Counsel, Human Resources, the Office of Finance, OSP, and the Audit Division is engaged in addressing the needs of this requirement. A draft document specific to this purpose has been developed for thoughtful discussion and review, and will be vetted for broader implementation through appropriate channels.

"Troublesome Clauses"

The Institute has been faced with negotiating an increasing number of agreements with publication or access restrictions from both federal and industrial sponsors. It is becoming increasingly difficult to negotiate these restrictions out of contracts, and the Institute had to abandon sponsorship in two cases during the past year.

The Federal Demonstration Project teamed up with the Council on Governmental Relations and the American Association of Universities to conduct a follow-up to the survey conducted in 2004. MIT was a participant, along with 19 other institutions. The new survey ("Restrictions on Research Awards: Troublesome Clauses 2007/2008") found 180 total instances of troublesome clauses, as compared with 138 in the previous survey. The frequency of restrictions on publications and foreign nationals was quite similar during the two time frames examined by the surveys. The increase reported in the new survey was due almost entirely to new types of restrictions that were not reported four years ago, specifically contract clauses that specifically mention export controls or other access/dissemination restrictions. More than half of the participants reported dealing with such clauses, unlike the previous survey where reports of such restrictions were negligible. (The full survey report is available at http://www.cogr.edu/docs/TroublesomeClauses.doc.)

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More information about the Office of Sponsored Programs can be found at http://web.mit.edu/osp/.