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Issue 10, Spring 2015

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## NIH Researchers -- Annual Disclosures are Due!

All investigators who are seeking or have obtained HHS research support must submit their annual update **beginning on Monday, June 1st**. Any disclosures submitted prior to Monday, June 1st will not count towards the annual update for FY16.

Please keep in mind the following requirements:

- Any HHS investigator, or anyone who intends to be an investigator on a future proposal to an HHS agency, must submit an annual disclosure **no later than July 31, 2015**.
- Annual disclosures from last year will not be current after July 31, 2015 and must be updated in USC's conflict disclosure system ("diSClose") by that date.
- Any previously disclosed relationships must be updated, regardless of whether there are any changes, with current information.
- Any previously disclosed relationships that are no longer active should be removed.
- Investigators need to complete their annual disclosures in order to submit new proposals or access continuation funding on an existing award.
- Disclosures posing potential conflicts of interest will be reviewed by the Conflict of Interest Review Committee (CIRC) in accordance with USC's Conflict of Interest in Research policy.
- Investigators must personally submit their disclosures. Disclosures cannot be delegated to others, who would not be expected to know an investigator's disclosable financial interests.

For new investigators, more information about Conflict of interest training can be found here: <http://ooc.usc.edu/hhs-required-coi-training>

diSClose may be accessed at <https://disclose.usc.edu>. In order to log in, a USC NetID and password are needed. The USC NetID is the first part of the USC e-mail address, and is the same ID used to access other USC applications like Quali, Workday, Blackboard, and myUSC.

If you need any help logging in to diSClose (including your USC NetID or password), please call the Help Desk at (213) 740-5857.

If you have questions, contact the Office of Compliance at (213) 740-8258 or [compliance@usc.edu](mailto:compliance@usc.edu).

## Navigating the Uniform Guidance at USC

As you are probably aware, the Uniform Guidance (also referred to as A-81) went into effect on December 26, 2014. The Uniform Guidance was issued by the Office of Management and Budget (OMB) and was intended to streamline the administration and operation of federal awards while increasing the government's oversight. The Uniform Guidance replaced eight different circulars including A-21 - Cost Principles for Educational Institutions. The Uniform Guidance does not change the core principles of what costs can be charged to a federal award. Costs still must be necessary, reasonable, allocable, allowable, and consistently treated. However, certain changes have been made in specific areas, including:

- Charging of Administrative/clerical salary costs
- Charging of computing devices under \$5,000
- Treatment of Participant Support costs
- Treatment of Visa Costs
- Subawards, including a de minimum of 10% F&A

For more information on these changes, please review the A-81 (Uniform Guidance) Quick Guide posted on the Office of Research website:

<https://research.usc.edu/files/2011/07/A-81-Quick-Guide-2.20.15.doc>

You may also review presentations from recent Research Administrators Forums on this topic. An overview on implementation was presented at the November 4, 2014 meeting and changes to the treatment of subawards was covered in the March 31, 2015 Forum:

<http://ooc.usc.edu/research-administrators-forum>

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## NSF OIG Promises Audits Will Pick Up in FY 2016

The fiscal year (FY) 2016 budget request for National Science Foundation (NSF) Office of Inspector General (OIG) reveals OIG's game plan - and it's one that could result in more audits of universities and other institutions.

In its request, NSF OIG said it plans to beef up staff in both its Office of Investigations (OI) and Office of Audit (OA) and to continue spreading the gospel of data analytics across the government, even as the technique has not yet immediately proven itself. If its funding request is approved by Congress, the NSF OIG will increase both its permanent staff and the contractors it uses to perform audits.

As it did in its FY 2015 budget request, OIG reaffirmed its commitment to data analytics, which it referred to as part of its "new business model" and defended as "already produced promising results."

According to the OIG, the OA "is employing enhanced technical capabilities and data analytics to improve oversight of NSF funds by 1) better targeting our audits toward the riskiest awardees and 2) more efficiently screening and analyzing large volumes of data."

Link to NSF OIG budget request:

[http://www.nsf.gov/about/budget/fy2016/pdf/32\\_fy2016.pdf](http://www.nsf.gov/about/budget/fy2016/pdf/32_fy2016.pdf)

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## NIH Data Sharing - Policy Snapshot

The NIH's new Genomic Data Sharing Policy, issued on August 27, 2014, has gone into effect, beginning with grant applications submitted for the January 25, 2015 due date. Applicants are expected to state in

the cover letter when a proposed study will generate large-scale human and/or nonhuman genomic data, and include a genomic data sharing plan in the application, according to a reminder notice issued December 4, 2014 (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-027.html>). If sharing of human data is not possible, applicants should provide a justification explaining why data sharing is not possible and provide an alternative data sharing plan.

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