Research Administration Practices (RAP) Sessions

International Projects or Sponsors

October 26, 2023

Sharon Ray, Associate Director, RAS; International Lead Liaison

with

Cathy Borgesen, Senior Fiscal Officer, Climate Grand Challenges VP for Research
RAP Sessions: Targeted skills based educational offerings open to the Research Administration community at MIT. Information gathered and shared with attendees can be taken back to their desks and applied immediately.

- International Engagements
  - Metrics
  - MIT Global Support Resources
  - Elevated Risk Review
- International Engagement Considerations
- Sponsor Information
- Questions
Introductions

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RAS International Metrics

Over last 3 Fiscal Years
• Submitted 662 proposals to international sponsors totaling over 338M in requested funds

We currently have
• 386 Active awards from international sponsors with total anticipated funding of over 1.2B
• 198 Active or In-Process subawards to international entities
Global Support Resources

- Start Here Global Support Resources

- Travel & Safety Abroad (Register, Warnings, ISOS)

- GlobeSmart Guides cultural information for 101 countries (MIT credentials required)
International Engagements

- Activities conducted the United States or funded by an international sponsor
  - International subaward entities
  - International research activities (not int’l conferences)
- Require Export Control review
  - KC proposal evidence for audit purposes
- Require Liaison Review
  - International Industry sponsored funding – Laureen Horton
  - Other International engagements – Sharon Ray
Elevated Risk Review

• Russia, China (including Hong Kong), Saudi Arabia

• Any Defense Arm of any Foreign Government

• Project-dependent
  • Sensitive Research - Underwater autonomous vehicles
  • Complex projects in unstable regions

• Generally, will not hold up hard proposal deadline
  • Review process can take time
Elevated risk review process

Gift Acceptance Committee

ACADEMIC REVIEW
International Advisory Committee (IAC)
[FACULTY]

RISK REVIEW
Senior Risk Group (SRG)
[VPR + Gen. Counsel + Vice Provost]

Gifts from China, KSA, Russia

All Chinese, Russian, & KSA engagements + selected other engagements

‘COMPLIANCE+’ REVIEW
International Coordinating Committee (ICC)
[STAFF + Vice Prov.]

MIT Washington Office
Country/area experts
Ad hoc faculty committees
Technology experts

President & Provost

Research Administration

Richard K. Lester
Risk Considerations

• U.S. National Security Risk
• Political, Civil and Human Rights Risk
• U.S. economic competitiveness risk
• Counter to MIT’s core values; not aligned with its academic mission; might lead to discrimination between members of our community; would permit undue external influence over the direction of MIT research or education
• Risks related to IP, EC compliance, data security and access
• Risks to MIT of not accepting an engagement
• Are there actual benefits to MIT that would be difficult to obtain otherwise.
Considerations - Logistics

• International Programs Compliance entry added only for proposals requiring elevated risk review
• Time Zones and Deadlines
• KC actions – new sponsors or subs
• International Subawards?
• Increased DLCI Admin support
Considerations - Communications

• Email is not always best method of communication
  • Time Zones and Internet Capacity

• Language Barriers
  • Translation
  • Terminology
  • Documents may have different meanings

• Cultural differences
  • Written communications
  • Signatories on official documents
• Check KC to see if the organization is in KC for selection. If not, request a new subaward organization.

• If not, assume that they know nothing about the process.
  • Provide a basic overview of the process; how it works; what the steps are; and how it will work in later years.

• Don’t assume you speak the same language, even when you both speak the same language.
  • Provide templates and examples if available.

• Use the phone or Zoom
Considerations – Financial/Budgetary

• Foreign Currency
  • Exchange rates
  • Billing in foreign currency

• Policies for financial reporting and documentation

• Budgets
  • VAT Tax
  • Registration/Legal Fees
  • Travel
  • Security, drivers
  • Personnel engagement
  • Employment Regulations – Pay Master, Consultants, 13th Month

Research Administration Practices (RAP) Sessions
INITIAL BUDGET RECEIVED FROM SUBAWARDEE

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Study on stakeholder identification to identify the target agency for capacity building</td>
<td>$4,211</td>
</tr>
<tr>
<td>Training materials development (ToC development workshop)</td>
<td>$2,105</td>
</tr>
<tr>
<td>Training materials/curriculum development</td>
<td>$6,316</td>
</tr>
<tr>
<td>Conduct training to the identified agencies</td>
<td>$8,421</td>
</tr>
<tr>
<td>Learning visit for the trained colleagues</td>
<td>$0</td>
</tr>
<tr>
<td>Research team visit to Project progress meeting</td>
<td>$5,263</td>
</tr>
<tr>
<td>Half-yearly refreshers course</td>
<td>$1,053</td>
</tr>
<tr>
<td>Quarterly learning harvesting workshop</td>
<td>$1,263</td>
</tr>
<tr>
<td>Upgradation of the curriculum (annually)</td>
<td>$0</td>
</tr>
<tr>
<td>Relevant climate policy review</td>
<td>$4,211</td>
</tr>
<tr>
<td>Policy campaign and advocacy</td>
<td>$2,526</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td><strong>$35,368</strong></td>
</tr>
</tbody>
</table>

Everyone thinks differently

- Provide examples...many examples, if needed
- Ask questions?
  - What do you mean by “Quarterly learning harvesting workshop?”
  - What is needed for the trainings?
- People, places, things tends to be how we think about things
- Others have different buckets
Considerations - Billing

• **Scheduled Payments** (preferred)
  • This is the main form of invoicing sponsors who wish to pay in foreign currencies and for all consortia memberships.

• **Milestone Payments**
  • **Int’l Sponsors:** No invoices will generate until the DLC emails billing-issues@mit.edu to confirm the milestone has been met and the invoice can be sent.
  • **Int’l Subawards:** *May* be an appropriate option for international subawards to small not-for-profit organizations – benefit to MIT and Subaward

• **Standard Billing (cost reimbursable - **NOT advised)**
  • High Risk of overspending due to fluctuating exchange rates
  • Difficult to manage at DLCI
Considerations – Financial Management by DLCI

DLCI responsibilities:

• monitoring all incoming revenue to ensure their project is funded.
• notifying RAS of any changes needed to the authorized total based on currency conversion.
• providing both financial reports and projections/funding requests when applicable.
Considerations - Contracting

• DLCI
  • Confirm SOW, Budget
  • Implementation details (in consult w/CA)

• RAS
  • Initial review
  • Financial, payments and reporting
  • Engage OSATT, OGC, TLO as necessary
  • May engage DLCI Admin and/or PI in meetings with sponsor

• Operate in different regulatory environments
  • Terms & conditions could prove problematic – Intellectual Property
  • Different policies around costs and reporting requirements
  • Additional documentation or certifications
  • Documents may have different meanings
DLCI Contracting - Example & Best Practices

• Socialize the big issues.
• Understand the importance of the terms of the agreement and why they are included.
  • Financial reporting, documentation
• For example, can you give me an example of why MIT needs to be able to publish?
Engaging International Subawards

• Lack of experience with US funding
  • UEI - SAM.Gov Registration
  • Agency Specific - NCAGE code required for SAM - some exceptions listed in SAM.GOV
  • Agency specific - eRA Commons, Research.gov - registrations
  • Indirect Cost limitations
  • Sufficient infrastructure to meet Federal flow-down requirements

• New to MIT
  • Request adding to KC and also as Vendor with VPF (at award)
  • Assessment Questionnaire ahead of time to reduce delays at award

• Risk Assessment – specific to subawards - *when is an elevated risk review required?*
  • USA Spending.Gov
  • Debarment
  • Subpart F not applicable - what information can be provided to eliminate the risk
From KC Home, click **Search for Subawards**

**KC Subaward Module**
View a KC Subaward

To view a Subaward or view Subaward Attachments in KC, you will need KC authorizations as granted by the Primary Financial Authorizer for the Unit/PC. See List of Kuali Coeus Roles – Roles DB Authorizations Maintained by the DLC
Federal Sources - USAID

- Additional documents (Reps & Certs)
- Assistance vs. Acquisition – All current MIT Co-Ags
- Extensive involvement from Program Officers and prior approvals
- May use different funding streams – structure/reporting
- In-Country Registrations
- Annual Program Plans – May require budget modifications
- Bi-Lateral Agreements
- International Subaward Entities
Federal Sources – Department of State

• Funding directly from Washington
  • May require Mission involvement for in-country approval of activities
  • OFAC Licenses
  • Additional administrative requirements

• Funding through in-country Missions
  • Often request excessive banking information

• Letters of Intent/Statement of Interest
Funding Sources – European Union

• **Marie Curie Fellowships**
  • Confirm home institution agreement to accept MIT terms
  • MIT PI – cannot have overlap with projects
  • Special arrangements made to allow these fellowships

• **Synergy Grants**
  • Requires PI Questionnaire and Risk Assessment – VPR Approval
  • Require confirmation email from every institution PI
    • That all participants agree that no patent protection will be sought for any inventions created during the performance of the ERC Synergy Grant Research.
    • All participants agree that publication and results will be made promptly per EU guidelines

• **Other EU opportunities – Case-by-Case**
Funding Sources - Australian Research Council

• Generally, no funding coming to MIT, yet PI makes a commitment of effort including a dollar value
• PI often makes commitment without consulting RAS
  Routing at proposal time will reduce delays at award time
• IP and Confidentiality terms are primary concern
• Need to know what the PI is contributing to the project – will any BIP be involved?
Funding Sources

• Hevolution Foundation (article)
  • Currently under review (Saudi Arabia)
• UN, World Bank
  • Treated as Procurement
• Foreign Governments
  • Lengthy negotiations
Funding Sources - Fellowships

• **Banting Fellowships**
  • Research Development manages initial internal review
  • No budget in KC as funds go to Fellow

• **Rubicon Fellowships**
  • Jointly owned IP requirement
  • PI confirmation of not overlap
  • Clawback provision may require PI backing

• **Internationally-funded Fellowships – other**
  • Funding fellow directly – *Routing of proposal likely not necessary*
  • Funding managed at/by MIT – *Always requires routing and account*
  • DLCI may consult/engage MIT Postdoctoral Research Office - Overseen by Colleen Leslie and led by Ann Skoczenski for guidance and as a resource
University Engagement with China: An MIT Approach

• In early 2021, a small group of senior MIT faculty and administrators with expertise on U.S.-China relations and technological competitiveness developed a set of principles and recommendations for how MIT should approach its engagement with Chinese organizations and individuals.

• The report charts a path for MIT to conduct academic interactions and collaborations with individuals and organizations in China in ways that uphold the core values of the Institute.

• The report was also intended to contribute to discussions of this subject at other universities.... And has
Questions – Help

Your RAS Contract Administrator
• By DLC
• By Sponsor/Agency

RA Support Team – ra-help@mit.edu

Community Drop In Sessions
• Held every Monday (non holiday), 1pm-2pm
• Zoom mtg link: https://mit.zoom.us/j/91518116791