



# 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*

# Agenda

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

## Sharon Ray, CRA

Associate Director, RAS  
International Lead Liaison  
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## Cathy Borgesen

Senior Fiscal Officer  
MIT Climate Grand Challenges  
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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)

MIT GLOBAL SUPPORT RESOURCES

Travel & safety abroad +

Planning & agreements +

HR, finance & admin +

About +

Contact +

JUMP STARTS

## Start smart on international engagements

You have arrived at the MIT Global Support Resources (GSR) website, where we bring together the essential administrative resources from across MIT to assist members of our community in planning and managing their global activities. This service is provided by the Office of the Vice Provost for International Activities in collaboration with the International Coordinating Committee (ICC).

### Travel abroad information session

The Office of the Vice Provost for International Activities sponsored an [information session \(pdf\)](#) on international travel on December 7, 2022. MIT experts spoke and answered questions on a range of topics related to traveling abroad.

WATCH THE SESSION

aperian

## Welcome!

Aperia is an online resource that can help enhance your cultural awareness and improve communication in a global environment. The portal contains GlobeSmart Guides for 101 countries and tools to help you collaborate and work effectively across cultures.

We hope you find this resource helpful!

### GlobeSmart Guides

Search Cultures

Czech Republic

Denmark

Dominican Republic

Ecuador

Egypt

El Salvador

Back to Top

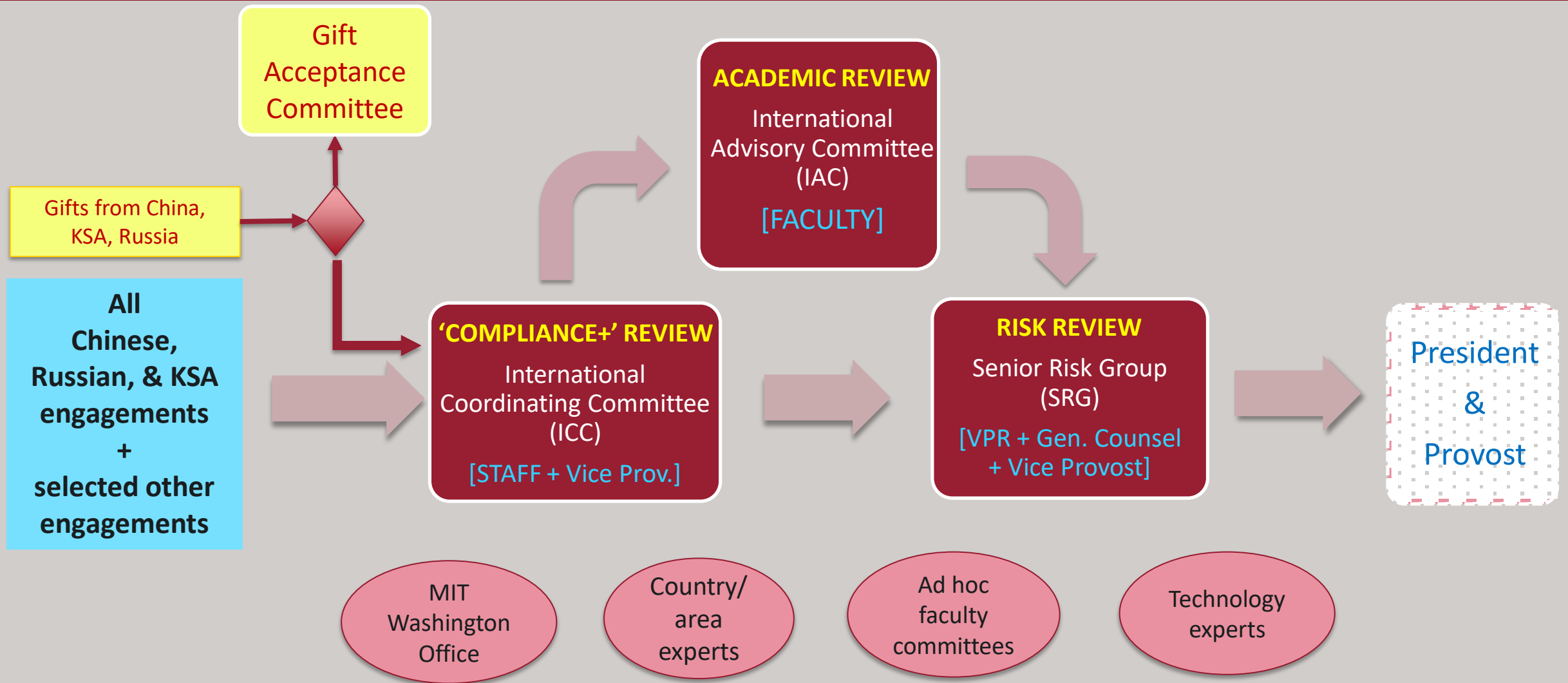
# International Engagements

- 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



Research Administration



# 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.

# **INTERNATIONAL ENGAGEMENT CONSIDERATIONS**

# 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

# DLCI Communication Example & Best Practices

- 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, 13<sup>th</sup> Month*

# DLCI Budgetary Example & Best Practices

## INITIAL BUDGET RECEIVED FROM SUBAWARDEE

<b>Capacity building of two government agencies and/or NGOs in Bangladesh to adopt more proactive, science- and community-based approaches to climate change adaptation</b>	
<i>Study on stakeholder identification to identify the target agency for capacity building</i>	\$4,211
<i>Training materials development (ToC development workshop)</i>	\$2,105
<i>Training materials/curriculum development</i>	\$6,316
<i>Conduct training to the identified agencies</i>	\$8,421
<i>Learning visit for the trained colleagues</i>	\$0
<i>Research team visit to Project progress meeting</i>	\$5,263
<i>Half-yearly refreshers course</i>	\$1,053
<i>Quarterly learning harvesting workshop</i>	\$1,263
<i>Upgradation of the curriculum (annualy)</i>	\$0
<i>Relavant climate policy review</i>	\$4,211
<i>Policy campaign and advocacy</i>	\$2,526
<b>Sub-Total</b>	<b>\$35,368</b>

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](mailto: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

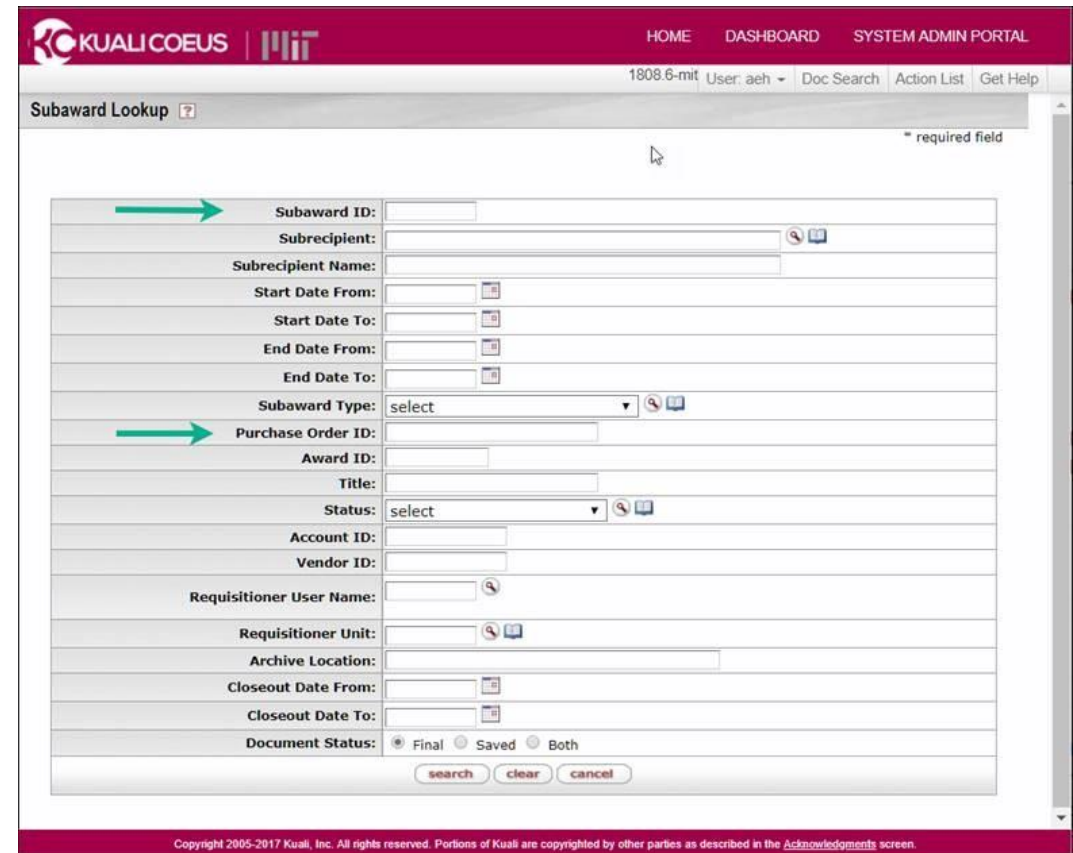
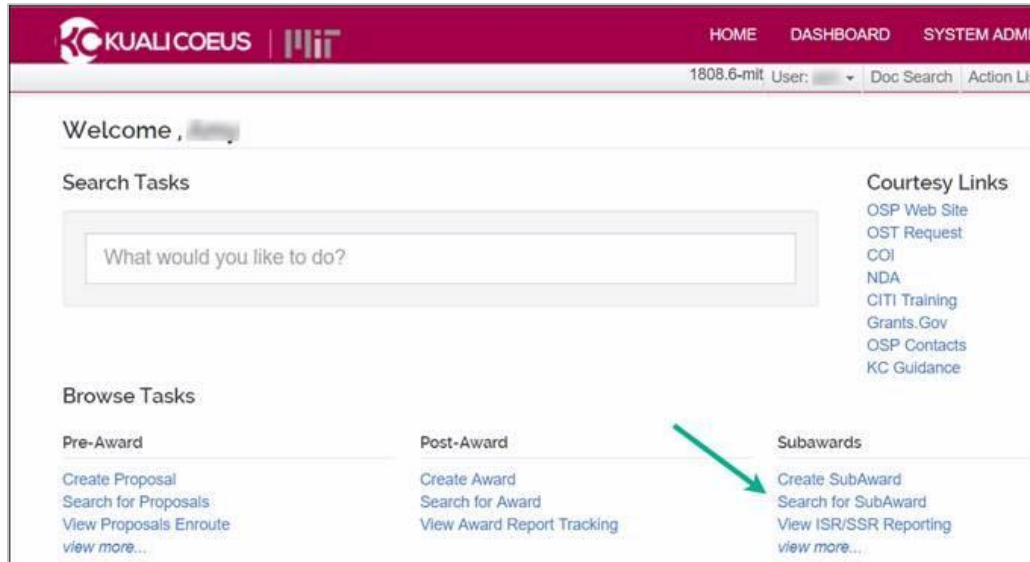
- Socialize the big issues.
- Understand the importance of the terms of the agreement and why they are included.
  - Financial reporting, documentation
- For example, can you give me an example of why MIT needs to be able to publish?

# 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

# KC Subaward Module

From KC Home, click **Search for Subawards**



# 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 Kualo Coeus Roles – Roles DB Authorizations Maintained by the DLC](#)

KC Subaward ?

Requisitioner ID: [redacted] Document ID/Status: [redacted] FINAL  
 Requisitioner Unit: [redacted] Lab Subaward ID: 4 [redacted]  
 \* Subrecipient: Pontificia Universidad Catolica of Chile Last Update: 11/11/2024 11:11:11 AM

Subaward Financial Supplemental Info Template Information Comments, Notes & Attachments Subaward Actions Medusa

expand all collapse all

Document Overview

Document Overview

\* Description: [redacted] Explanation: [redacted]

Organization Document Number: [redacted]

Subaward

Subaward

Subaward ID:	4 [redacted]	Execution Date:	[redacted]
Version:	4	End Date:	[redacted]
Start Date:	01/01/[redacted]		
Subaward Type:	Grant		
Title:	[redacted] Puerto Rico	Status:	Active
Account ID:	[redacted]	Vendor ID:	[redacted]
Requisitioner User Name:	[redacted]	Requisitioner Unit:	[redacted]
Archive Location:	[redacted]	Closeout Date:	[redacted]
Federal Award Project Description:	[redacted]		
F & A Rate:	[redacted]	de Minimus:	No
Comments:	[redacted]		
Obligated Amount:	43,597.00	Anticipated Amount:	43,597.00
Amount Released:	43,596.77	Available Amount:	0.23
Cost Type:	Cost Reimbursement	Site Investigator:	[redacted]
Requisition ID:	[redacted]	Risk:	▲
Subrecipient:	000365 [redacted] Pontificia Universidad Catolica of Chile 980870054		
FFATA Required:	No	FSRS Subaward Number:	[redacted]

Funding Source

Funding Source

Award Number:	Account ID:	Award status:	Sponsor ID:	Amount:	Final Expiration Date:	Actions
Current Funding Sources						
show	024536-00003	6934793	Active	011506 : Laura and John Arnold Foundation	1,833,400.83	12/31/2024 <a href="#">Open award</a> <a href="#">medusa</a>

Contacts

Contacts

	* Person or Organization	* Project Role	Office Phone	Email	Actions
1	[redacted]	Subcontract Principal Investigator	[redacted]	[redacted]	

Closeout

Closeout

	Closeout Type:	Date Requested:	Date Followup:	Date Received:	Actions
1	IP - RST	[redacted]	[redacted]	[redacted]	
	Comments:	[redacted] received			

# INTERNATIONAL SPONSORS

# Federal Sources - USAID

- Additional documents (Reps & Certs)
- Assistance vs. Acquisition – All current MIT Co-Ags
- Extensive involvement from Program Officers and prior approvals
- USAID Standard Provisions
- 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](mailto:ra-help@mit.edu)

Community Drop In Sessions

- Held every Monday (non holiday), 1pm-2pm
- Zoom mtg link: <https://mit.zoom.us/j/91518116791>