

# SLU

# RESEARCH



Igniting Discovery, Transforming Lives

Faculty Senate January Meeting



# Overview

- Facilities & Administration (F&A, often referred to as indirect) Cost Distribution
- Principal Investigator (PI) Policy
- Questions

# F&A Distribution Standard Operating Procedure

## Purpose and Introduction

- ❑ Outline revenue share distribution process for indirect costs recovered on externally sponsored awards (Fund 31).
- ❑ F&A/indirect costs are recovered in accordance with the university's negotiated rate agreement approved by DHHS or as external sponsor (non-federal or federal) dictates.
- ❑ There are no federal restrictions on how recovered F&A/indirect costs can be used by an awarded university.
- ❑ SLU chooses to distribute a portion of F&A/indirect costs to deans and principal investigators

# F&A Distribution Standard Operating Procedure

## Decision-making

- President, CFO, Provost's Office, OVPR, and F&A committee determine F&A distribution percentages
- Moving forward SOP states review will occur every 2 years
- Principles considered in decision-making:
  - Cost of research
  - Faculty competitiveness in securing external funding
  - Incentivizing PIs and Deans to invest in research
  - Enhance SLU's national research profile

# Sponsored Programs – Indirect Cost Rates

- Current negotiated DHHS F&A rate for organized research: **51.50%**
- Annually, SLU collects ~\$12m in F&A based on expenditures
- Total grant administration (OVPR, SPA) costs SLU ~\$13m
- Current F&A recovery is not sufficient to cover SLU's indirect costs
- Other indirect costs:
  - Depreciation/interest expense
  - Facilities (maintenance, utilities, etc)
  - ITS
  - Security
  - Business and Finance
  - President's Office
  - MarCom
  - General Counsel
  - Human Resources
  - DICE
  - Mission and Identity

# F&A Distribution Standard Operating Procedure

## Distributions for FY25 (distributed in late fall 2025)

- ❑ 85% to SLU central budget to support research administration and operations
- ❑ 10% PI to support individual research portfolios
- ❑ 5% Deans to support research activities of school/college

## Distributions for FY24 (distributed in late fall 2024)

- ❑ \$7.5 M to SLU central budget
- ❑ 45% to PIs
- ❑ 25% to Departments
- ❑ 15% to Deans
- ❑ 15% to OVPR

# F&A Distribution Standard Operating Procedure

## FY23 Distribution Information

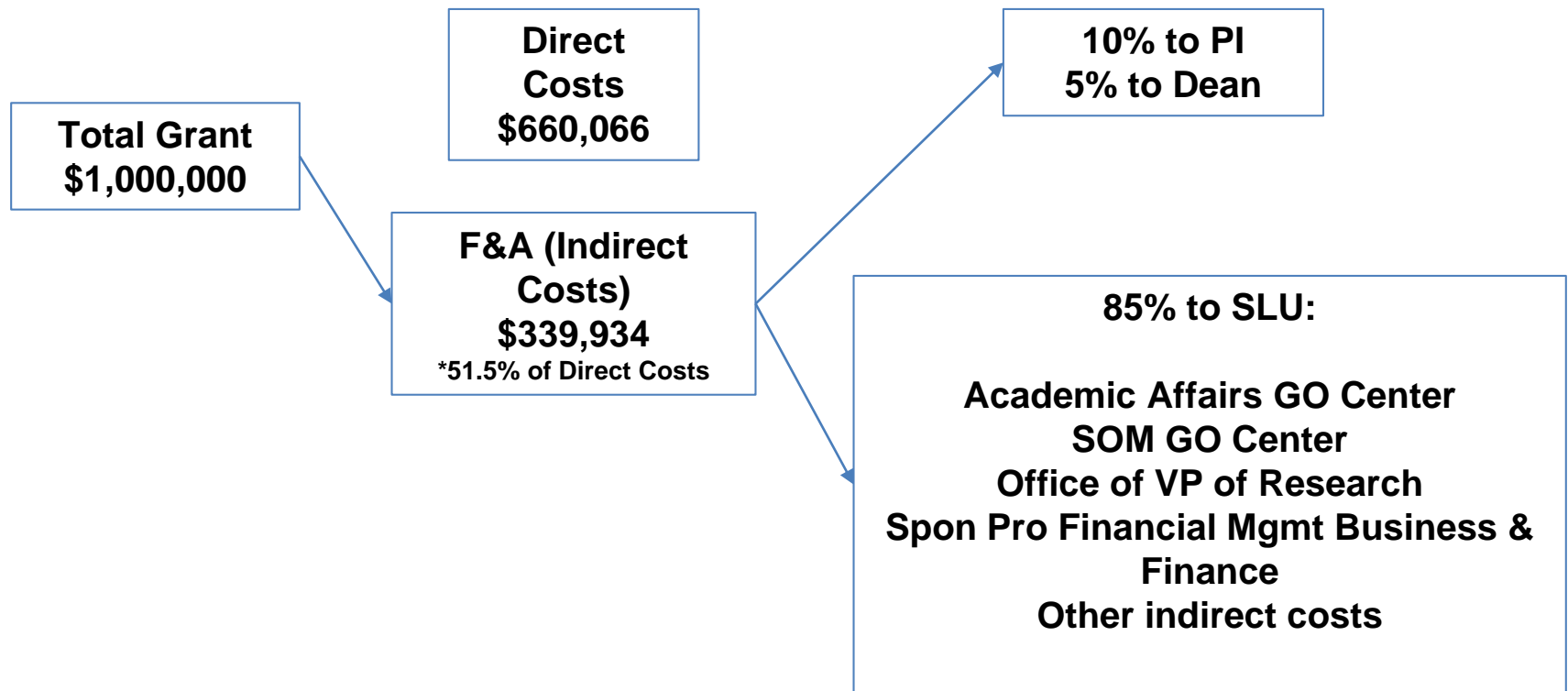
PI Share (45%)	\$ 1,811,972	Amt to PI (15.64%)
Cost Center Share (25%)	\$ 1,022,281	Amt to Cost Center (8.69%)
School Share (15%)	\$ 618,239	Amt to Schools (5.21%)
OVPR Share (15%)	\$ 609,263	Amt to OVPR (5.21%)
Amt to SLU	\$ 7,500,000	Flat amount
Huron Consultants	\$ 109,000	Flat amount
Total IDC Distributed	\$ 11,670,755	

## FY25 Distribution Information (based on FY23 IDC collected)

Amt to		
Colleges/Schools	\$ 583,537.75	5%
Amt to PIs	\$ 1,167,076	10%
Amt to SLU	\$ 9,920,142	85%
Total IDC Distributed	\$ 11,670,755	

# F&A Distribution Example

**Example:** Researcher is awarded \$1m grant from NIH and full award is expended by PI.



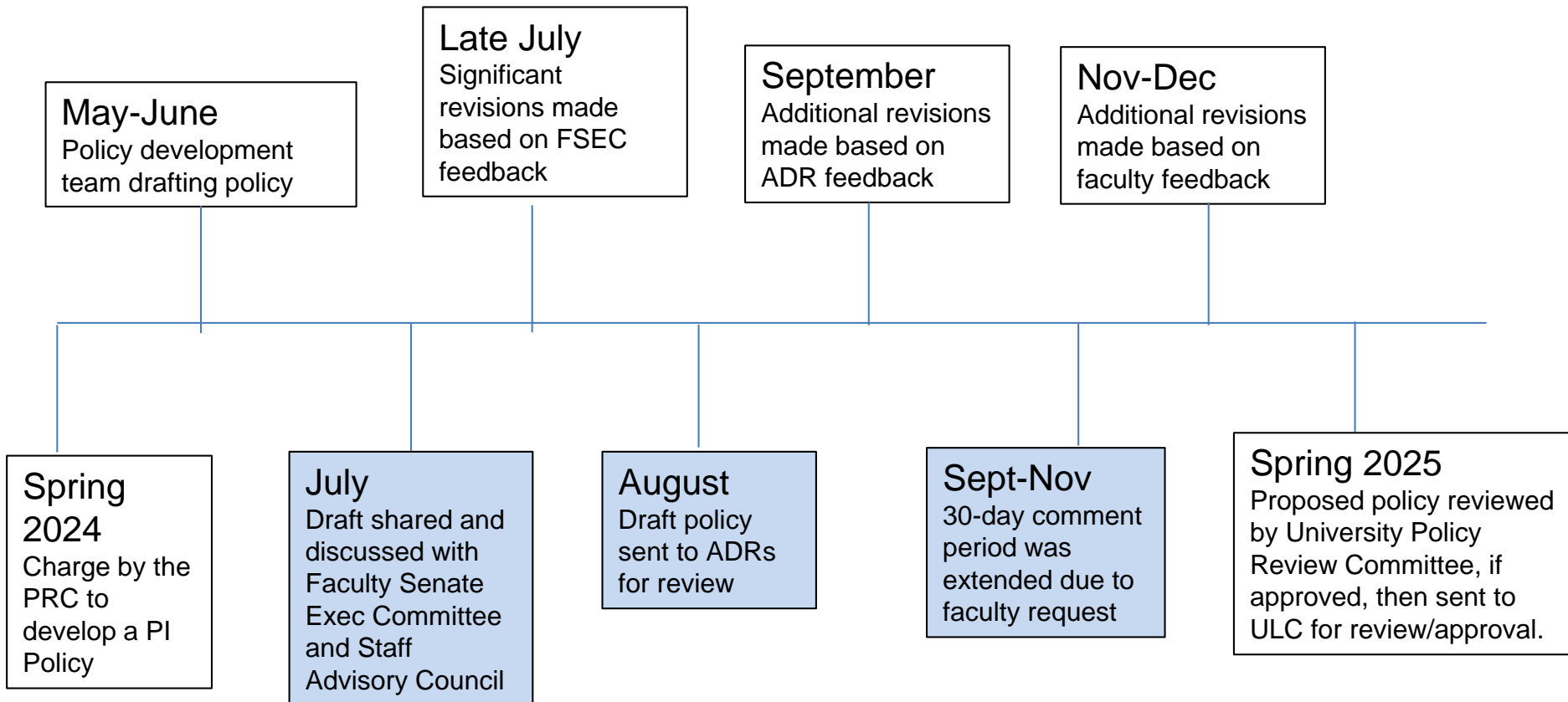
\*Please note: we cannot charge F&A on every budget category (e.g., gift cards, participant support) and we only receive F&A on expenditures not the awarded amount



# Principal Investigator Policy Initiation

- President's Research Council recommended the policy in response to Uniform Guidance Audit findings and discussed during sub-committee meetings.
- The policy was developed in coordination with Office of the Vice President for Research, Office of University Compliance & Ethics, Budget and Finance, and the School of Medicine.

# Principal Investigator Policy Development



# Principal Investigator Policy Feedback: Main Themes

- Clarity around the definition of PI
- Clarity around PI responsibilities versus university responsibilities
- Language seemed to imply PI is solely responsible for all functions and less responsibility for University/OVPR
- Concerns about the policy development process
- Supportive training for Workday

# Principal Investigator Policy Revisions

- ❑ Changed language to reflect shared responsibility
- ❑ Clarified language around the PI definition
- ❑ Simplified responsibilities in various sections to bullet points for ease of review and understanding
- ❑ Clarifying what the policy development process was and when feedback was solicited

# Clarity around definition of PI

## Original:

**Principal Investigator (PI):** individual who assumes full technical and fiscal responsibility for a sponsored proposal or award, including the supervision of other key personnel, research assistants, students, and staff. **A Principal Investigator must have sufficient experience to responsibly manage the project.** PIs at Saint Louis University may be a full-time SLU employee or an SSM-employed clinician with a SLU faculty appointment.

## Revised:

**Principal Investigator (PI):** individual who assumes technical and fiscal responsibility for a sponsored proposal or award, including the supervision of other key personnel, research assistants, students, and staff. PIs at Saint Louis University are generally a full-time SLU employee or an SSM-employed clinician with a SLU faculty appointment.

# Update to reflect shared responsibility between University and PI

## Original Section 1.0:

Saint Louis University (SLU) is committed to ensuring that all individuals engaged in research activities understand their roles and responsibilities as Principal Investigators. The Principal Investigator (PI) is charged with conducting objective research that generates independent, high quality, and reproducible results. PIs are responsible for the management and integrity of the design, conduct, and reporting of the research project and for managing, monitoring, and ensuring the integrity of any collaborative relationships. Regardless of sponsorship or funding source, the PI is responsible for conducting clinical and non-clinical research activities and projects in a manner that is ethical and compliant with all applicable university and sponsoring agency policies, procedures, and regulatory requirements.

# Update to reflect shared responsibility between University and PI

## Revised Section 1.0:

Saint Louis University (SLU), as a recipient of federal, industry, or foundational research awards, assumes and maintains a fiduciary responsibility to adhere to applicable laws, guidelines, and terms associated with a sponsored award. Research is a shared responsibility at Saint Louis University. Principal Investigators (PIs) play a significant role in our research ecosystem. PIs serve as an extension of the university and share the responsibility to ensure adherence with all applicable university and external sponsor requirements, terms, and conditions. As such, SLU is committed to ensuring that all individuals engaged in research activities understand their roles and responsibilities as Principal Investigators.

# Simplified responsibilities into bullets and added university responsibilities

## Original:

### **Human Research Protections Program**

PI are responsible for protecting the rights and welfare of human research participants in accordance with federal regulations and university and sponsoring agency policies and procedures. In doing so, he/she must complete, and assure that all key personnel involved in human research, complete and comply with the required education for the protection of human participants in accordance with federal regulations and university and sponsoring agency policies and procedures. He/She must also act as a liaison between the Human Research Protection Office (HRPO) and the sponsor and adhere to all approval requirements of the Institutional Review Board. Additionally, he/she must support and endorse cooperation with university compliance and monitoring efforts related to human participant research and report instances of noncompliance to the appropriate compliance office. More information regarding applicable policies and procedures is available via this [link](#).



# Simplified responsibilities into bullets and added university responsibilities

## Revised:

### Human Research Protections Program

The Institutional Review Board (IRB) Office is responsible for coordinating the review and approval of research studies involving human subjects. In terms of review and approval responsibilities, the PI will work collaboratively with the IRB Office to initiate, prepare, and submit IRB forms, required documentation, and review responses for review by the IRB. **Human research protections PI responsibilities include**, but are not limited to:

- Protecting the rights and welfare of human research participants in accordance with federal regulations and university and sponsoring agency policies and procedures.
- Ensuring that all key personnel involved in human research complete, the required education for the protection of human participants in accordance with federal regulations and university and sponsoring agency policies and procedures.
- Acting as a liaison between the Human Research Protection Office (HRPO) and the sponsor.
- Adhering to all approval requirements of the Institutional Review Board (IRB).
- Supporting and endorsing cooperation with university compliance and monitoring efforts related to human participant research.
- Reporting instances of noncompliance to the appropriate compliance office.

More information regarding applicable policies and procedures is available via this [link](#).

# Research Policy Review Process Moving Forward

- Timely feedback from the Deans Research Council and the SOM Research Planning Council will be sought during the policy draft phase
- Updates to established policies that do not require community comment will also be reviewed by RDC and SOM RPC

Questions?