

June 23, 2011

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***Subject: Research Compliance Survey Results
UCSD Business Process Self Assessment (BPSA) Program FY 2011
Audit & Management Advisory Services' Project #2011-32***

As part of an ongoing UCSD self-assessment program, approximately 520 BPSA Research Compliance surveys were distributed to management, staff, and faculty within Research Affairs; Environment Health & Safety (EH&S); and the Office of Post Award Financial Services (OPAFS). The purpose for this correspondence is to transmit the overall survey results for all participating departments. Please refer to *Attachment A* for demographic data regarding survey respondents, and the distribution of survey responses by survey question.

In total, 89 out of 517 members of the 7 departments participated in the electronic survey process resulting in a response rate of 17% (considered a normal response rate for a voluntary survey). Historically, the response rate for this survey has been in the 10-15% range.

The purpose of the survey was to evaluate the effectiveness of controls in the campus research administration infrastructure. Participants were asked to state whether they agreed with attributes for departmental practices in the following areas: Policies and Procedures; Research Administration (Pre- and Post-Award); Human and Animal Subjects; Scientific Misconduct; Conflict of Interest; Environment, Health & Safety; and Technology Licensing.

For most statements, a non-numbered six-point scale was provided ranging from “strongly agree” to “strongly disagree.” Statements were structured so that a “strongly agree” response reflected a strong departmental process, the presence of effective administrative and financial controls in practice, or departmental compliance with policies and procedures related to the conduct of research. Survey participants were also able to respond "Does Not Apply" or "Don't Know" to each survey statement.

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Overall Results by Survey Topic

The distributions of responses to survey statements are summarized by topic in the table below.

Topic of Survey Statement ¹	Agree ²	Disagree ³	Does Not Apply	Don't Know
Policies and Procedures	89%	7%	2%	0%
Research Administration - Pre-award	41%	3%	23%	32%
Research Administration - Post-award	37%	2%	18%	42%
Human / Animal Subjects	46%	2%	22%	27%
Scientific Misconduct	51%	5%	14%	30%
Conflict of Interest	49%	7%	11%	32%
Environment, Health and Safety	68%	6%	4%	21%
Technology Licensing	43%	7%	11%	39%

1 Statements were structured so that a “strongly agree” response reflected a strong departmental process, the presence of effective administrative or financial controls in practice, or departmental compliance

2 Responses indicated “Strongly Agree,” “Agree,” or “Somewhat Agree.”

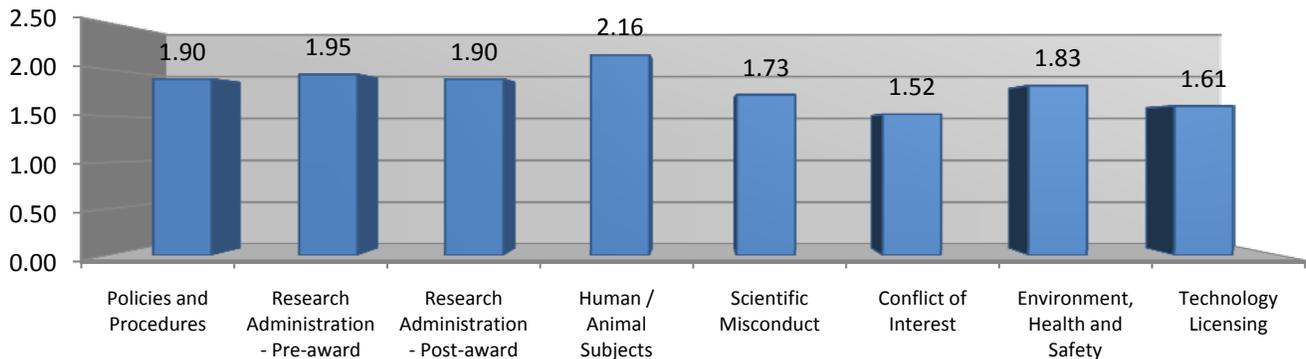
3 Responses indicated “Strongly Disagree,” “Disagree,” or “Somewhat Disagree.”

Composite Score Review

The following graph summarizes the composite scores for the 7 departments by subject area. Composite scores represent the average score for all questions within a subject area. For purposes of our calculation, agreements with survey statements were scored as follows:

- “strongly agree” = 3
- “agree” = 2
- “somewhat agree” = 1
- “somewhat disagree” = -1
- “disagree” = -2
- “strongly disagree” = -3

2011 Research Compliance Composite Score Review



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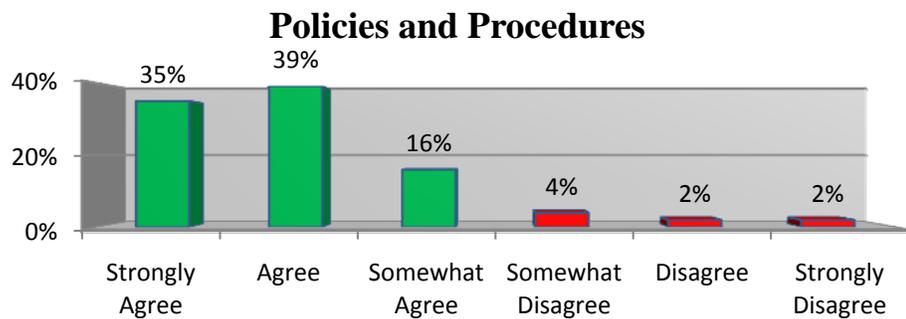
Composite scores indicate that participant responses were generally positive. A composite score trend review is depicted in *Attachment B*.

Distribution of Responses by Survey Topic

The following tables summarize the distribution of survey responses expressed as a percentage of all 89 responses received for each survey topic. The distribution of survey responses was positive and generally consistent across the various survey topics. The distribution of survey responses was also consistent with the distribution of responses in prior years' surveys.

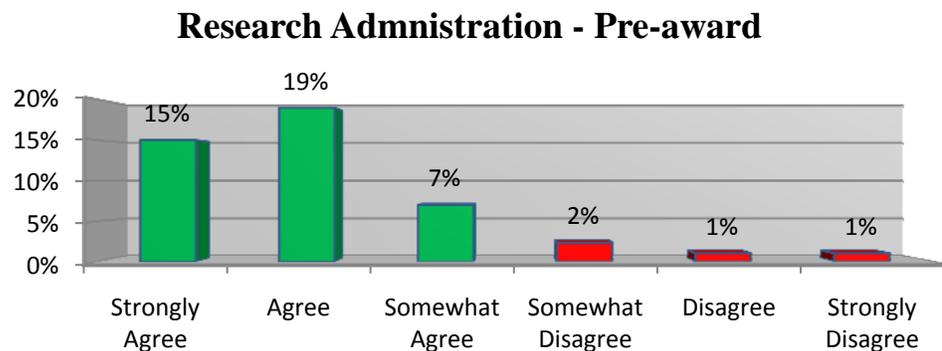
Policies and Procedures:

Policies, procedures, and other safeguards help ensure that research-related business objectives are achieved.



Research Administration - Pre-Award:

Effective pre-award processes ensure compliance with policies and procedures, and enhance the likelihood of success for research proposals.

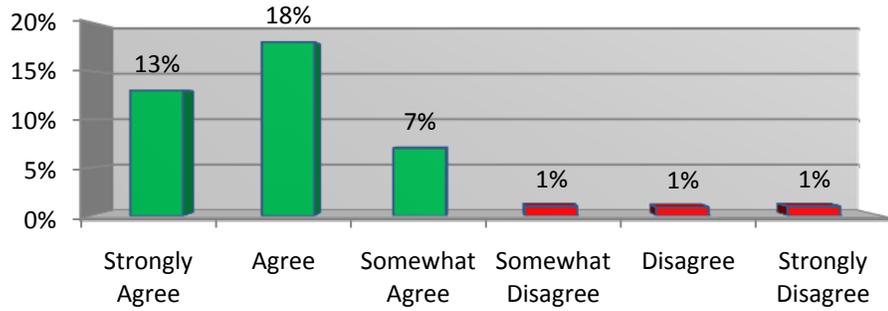


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Research Administration - Post-Award:

Effective post-award practices ensure compliance with policies and procedures, and reduce the risk of audit disallowances by sponsoring agencies.

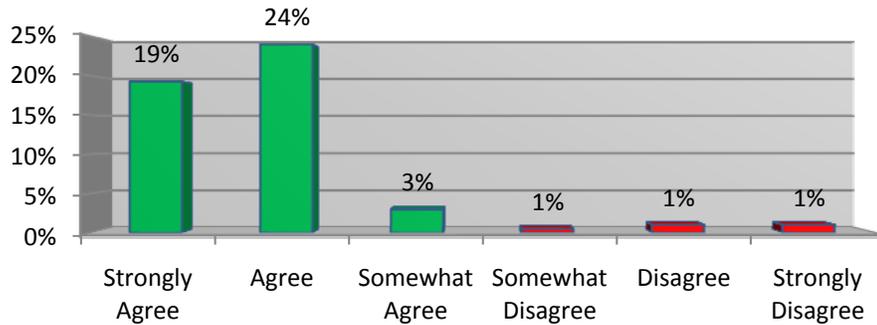
Research Administration - Post-award



Human/Animal Subjects:

Effective use of human and animal subjects ensures compliance with applicable policies and procedures, and provides for the ethical treatment of research subjects.

Human/Animal Subjects

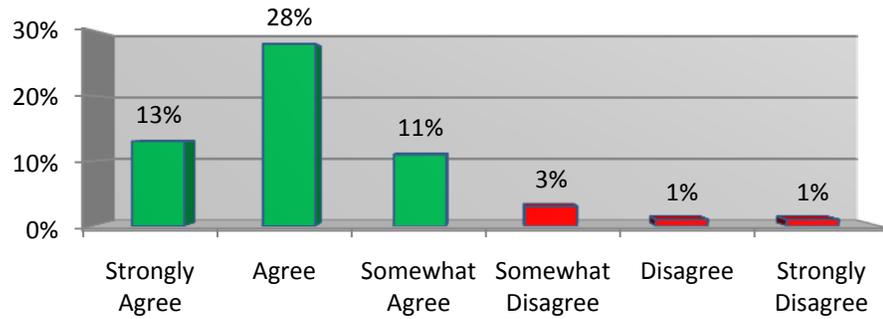


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Scientific Misconduct:

Monitoring of research activity helps ensure the integrity of the research.

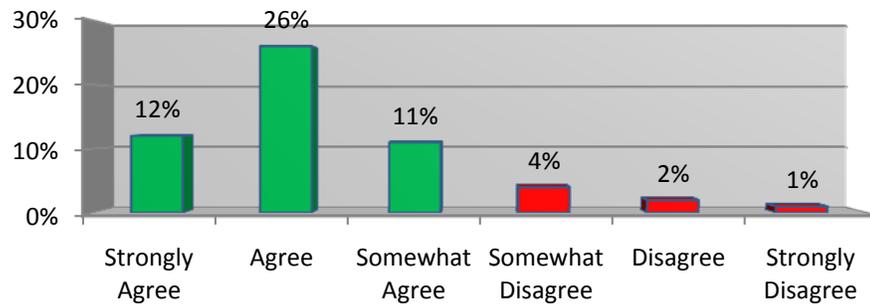
Scientific Misconduct



Conflict of Interest:

Disclosure of financial interests ensures compliance with applicable policies and procedures, and reduces the appearance of improprieties.

Conflict of Interest

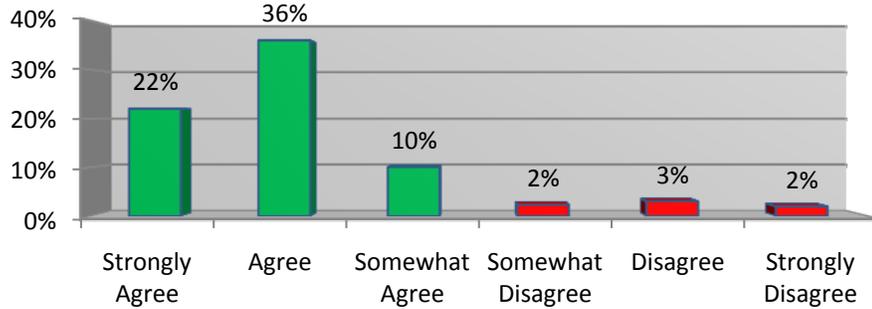


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**Environment,
Health & Safety:**

Compliance with rules regarding environment, health, and safety helps to ensure a safe workplace for faculty, staff, and students.

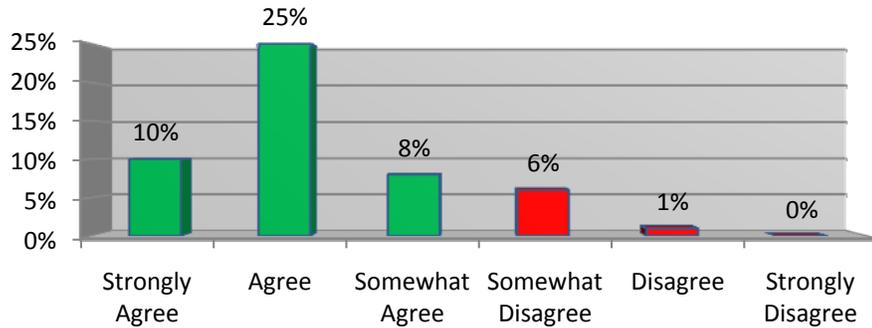
Environment, Health and Safety



**Technology
Licensing:**

Compliance with rules for technology licensing protects researchers' rights, as well as the University's rights, to intellectual property.

Technology Licensing



Results by Survey Module and Statement

For survey responses evaluated by module, there were no modules or individual survey statements returned with a rate of disagreement above 25%. In fact, there was only one question where more than 11% responded unfavorably. Twenty four percent of respondents did not agree that supervisors actively evaluate safety performance as part of annual performance reviews.

To assist your review, we have attached a copy of the actual survey statements with results noted (*Attachment A*).

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Composite Score Trends

Attachment B provides an overview of the BPSA Research Compliance Survey composite scores by category for the period of 2007 through 2011.

Current year composite scores for all categories have decreased or increased, sometimes significantly, from last year's results. Decreases in scores ranged from 7% to 31%. Increases ranged from 4% to 64%. The most significant decreases occurred in Conflict of Interest (31%), and Tech Licensing (28%). Trends in composite scores will be presented to the Compliance Audit Risk and Ethics (CARE) Committee for discussion.

For purposes of understanding the composite score trends it is important to note that, since the BPSA Research Compliance Survey samples different organizations and departments each year, changes in the composite scores from year to year are not necessarily reflective of the changes occurring within any particular UCSD organization or department. Rather, these composite score trends should be interpreted in the context of the campus as a whole. (Attachment C shows the departments participating in this survey in the most recent prior years.)

Audit & Management Advisory Services appreciates the support of participating divisions and personnel. If you have any questions regarding this report, please call me at 534-3913.

Stephanie Burke
Assistant Vice Chancellor
Audit & Management Advisory Services

Attachments

cc: L. Collins
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M. Generales
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1. Select the name of your Area/Department/Division/Program/Center		
Animal Care Program	13	15%
Animal Welfare Program	1	1%
Contracts and Grants	11	12%
Environment, Health and Safety	31	35%
Government Research Relations	0	0%
Office of Post Award Financial Services	11	12%
Research Ethics Program	0	0%
Technology Transfer and Intellectual Property	12	13%
VC-Research	10	11%
Total	89	100%

2. Do you have a staff or academic appointment?		
Staff	88	99%
Academic	1	1%
Response Declined	0	0%
Total	89	100%

3. Policies and Procedures								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
I sometimes need to refer to Policies and Procedures in order to do my job properly.	33 37%	35 39%	11 12%	4 4%	2 2%	2 2%	2 2%	0 0%
I know where to find the Policies and Procedures needed for specific issues.	29 33%	34 38%	18 20%	4 4%	1 1%	1 1%	2 2%	0 0%

4. Research Administration - Pre-award								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Campus employees have regular access to external information required for effective contract and grant proposal development including federal guidelines, program announcements, grant procedures, etc.	14 16%	16 18%	8 9%	1 1%	2 2%	0 0%	20 22%	28 31%

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4. Research Administration - Pre-award (Cont.)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Research proposals are reviewed to ensure that University guidelines regarding the review, approval, and submission of proposals have been followed.	16 18%	23 26%	4 4%	3 3%	2 2%	0 0%	19 21%	22 25%
Research proposals include investigator(s) that are eligible, and research activities (scope of work) that are approved by the Department Chair.	14 16%	19 21%	5 6%	2 2%	0 0%	0 0%	21 24%	28 31%
The campus has a process for ensuring applicable space, personnel, equipment, and cost-sharing commitments (or matching funds) can be fulfilled prior to applying for a grant.	12 13%	16 18%	9 10%	1 1%	0 0%	2 2%	21 24%	28 31%
Drafts of grant applications and contract documents (such as service agreements) are reviewed, authorized, and executed by the appropriate University office(s).	16 18%	20 22%	8 9%	1 1%	0 0%	0 0%	20 22%	24 27%
Pre-award costs are charged to agreements only when specifically authorized and documented.	10 11%	9 10%	2 2%	1 1%	0 0%	1 1%	22 25%	44 49%

5. Research Administration - Post-award								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
The campus charging practices for contract and grant funds comply with OMB Circular A-21, cost accounting standards, and relevant campus policies (PPM's 150-40, 150 42, and 150-43).	15 17%	15 17%	2 2%	2 2%	0 0%	0 0%	16 18%	39 44%
For labor costs charged to sponsored research agreements, the campus certifies effort using the Electronic Certification Effort Reporting Tool (ECERT), the replacement system of Personnel Activity Report (PAR), and processes payroll expenditure transfers as required by policy (PPM 150-66).	12 13%	12 13%	4 4%	0 0%	0 0%	0 0%	16 18%	45 51%
The campus monitors expenditures, and periodic programmatic progress, against contract and grant budgets.	8 9%	15 17%	8 9%	1 1%	1 1%	0 0%	16 18%	40 45%
Principal Investigators receive budget and expenditure information, and review the accuracy of recorded transactions.	7 8%	14 16%	7 8%	3 3%	1 1%	0 0%	17 19%	40 45%
Program income generated on grant-funded work is reported to the appropriate agency, and disposed of in accordance with terms of the grant.	8 9%	12 13%	9 10%	1 1%	0 0%	0 0%	16 18%	43 48%

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6. Research Administration - Post-award (Cont)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Campus procedures for preparing technical and progress reports for research sponsors ensure that reports provide accurate information, and are submitted timely.	6 7%	12 13%	10 11%	1 1%	3 3%	0 0%	17 19%	40 45%
Campus business transactions are reviewed prior to being authorized, and exceptions to policy are approved and documented.	16 18%	15 17%	4 4%	2 2%	0 0%	1 1%	16 18%	35 39%
Campus purchases are made in accordance with policy and using the right mechanisms (e.g. procurement cards, purchase orders, requests for payment, etc.).	15 17%	19 21%	6 7%	2 2%	0 0%	1 1%	16 18%	30 34%
Campus travel and entertainment expenses are processed in accordance with applicable policies and procedures.	15 17%	27 30%	6 7%	1 1%	0 0%	2 2%	16 18%	22 25%
Campus non-payroll expenditure transfers conform to all applicable policies and procedures (PPM 300-3).	11 12%	16 18%	5 6%	1 1%	0 0%	1 1%	14 16%	41 46%

7. Human / Animal Subjects								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Research with human subjects is submitted to the Human Research Protections Program (formerly the Human Subjects Office) for review and approval of the scope of research, the research protocol, and the informed consent document by the Institutional Review Board.	22 25%	23 26%	2 2%	0 0%	0 0%	0 0%	19 21%	23 26%
Research with animal subjects is submitted to the Institutional Animal Care and Use Committee (IACUC) for review and approval of the animal use protocol.	27 30%	27 30%	3 3%	0 0%	0 0%	0 0%	18 20%	14 16%
Research projects and related agreements are approved by the cognizant Institutional Review Board before the research is started.	17 19%	27 30%	7 8%	0 0%	0 0%	0 0%	18 20%	20 22%
The campus determines the number of research subjects in accordance with relevant requirements and ethical considerations.	10 11%	18 20%	2 2%	1 1%	0 0%	1 1%	19 21%	38 43%

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8. Human/Animal Subjects (cont)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Human subjects are apprised of the risks affiliated with any recommended medical procedure, treatment, device, or prescribed drug prior to the administering of same, and this is evidenced by an approved, completed, and signed consent form.	15 17%	18 20%	0 0%	1 1%	0 0%	1 1%	24 27%	30 34%
Research methods are conducted in conformance with sponsor requirements, regulatory requirements, University policies, and ethical considerations.	15 17%	25 28%	4 4%	0 0%	0 0%	1 1%	20 22%	24 27%
Animal subjects are cared for and disposed of in conformance with relevant regulatory requirements and ethical considerations.	24 27%	22 25%	1 1%	0 0%	0 0%	0 0%	21 24%	21 24%
The number of research projects conducted at a given time does not exceed the department's ability to effectively perform and manage the projects.	6 7%	12 13%	2 2%	4 4%	4 4%	2 2%	20 22%	39 44%

9. Scientific Misconduct								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Research activity is monitored to ensure consistency with the scope of work in the research proposal.	7 8%	20 22%	13 15%	3 3%	0 0%	2 2%	16 18%	28 31%
Research is conducted, documented, and reported in accordance with relevant regulatory requirements and ethical considerations.	11 12%	22 25%	10 11%	2 2%	0 0%	0 0%	15 17%	29 33%
Campus employees are aware of means for reporting concerns about possible misconduct (for example, offices responsible for investigating research misconduct, and the anonymous hot-line).	17 19%	29 33%	10 11%	5 6%	3 3%	0 0%	9 10%	16 18%
Concerns received regarding possible improprieties in the conduct of research are forwarded to the campus office responsible for investigating research misconduct.	10 11%	28 31%	5 6%	0 0%	1 1%	1 1%	11 12%	33 37%

10. Conflict of Interest								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Faculty and staff are aware of conflict of interest disclosure requirements.	12 13%	30 34%	16 18%	4 4%	3 3%	0 0%	9 10%	15 17%

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10. Conflict of Interest (cont)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Campus employees prevent conflict of interest issues by disclosing required information, and complying with policies and procedures.	13 15%	25 28%	11 12%	4 4%	3 3%	2 2%	9 10%	22 25%
Campus investigators disclose all direct and indirect financial interests in research sponsors prior to making commitment to accept funding, in accordance with requirements.	8 9%	16 18%	8 9%	5 6%	2 2%	3 3%	11 12%	36 40%
Central administrative offices such as the Conflict of Interest Office, or the Human Research Protections Program, are consulted if a question arises regarding the rules or forms for disclosing financial interests.	13 15%	21 24%	8 9%	2 2%	0 0%	0 0%	11 12%	34 38%
Central administrative offices such as Procurement, or Human Resources, are consulted if a proposed business decision might create the appearance of a conflict of interest.	7 8%	21 24%	8 9%	2 2%	2 2%	1 1%	11 12%	37 42%

11. Environment, Health and Safety								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Each campus department has named a Departmental Safety Coordinator (DSC) and each Principal Investigator has named or serves as an Area Safety Coordinator (ASC) to manage safety issues (See Blink http://blink.ucsd.edu/go/safetycoord).	20 22%	29 33%	13 15%	5 6%	3 3%	2 2%	2 2%	15 17%
Safe work practices are consistently followed and encouraged at the campus, department, supervisor, and individual levels, as necessary to avoid injuries.	20 22%	33 37%	19 21%	1 1%	4 4%	3 3%	1 1%	8 9%
Supervisors actively evaluate safety performance as part of annual performance reviews.	11 12%	25 28%	12 13%	5 6%	10 11%	6 7%	1 1%	19 21%
The campus maintains an Emergency Action Plan which details actions to be taken in certain emergencies (e.g., earthquake, fire, chemical spill, etc.).	29 33%	44 49%	5 6%	1 1%	0 0%	1 1%	1 1%	8 9%
The campus has integrated emergency preparedness into campus training sessions.	26 29%	34 38%	13 15%	0 0%	3 3%	2 2%	1 1%	10 11%

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12. Environment, Health and Safety (cont'd)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Approval is obtained from the Radiation Safety and Surveillance Committee and the Institutional Biosafety Committee prior to using new radioactive and infectious materials, respectively.	20 22%	36 40%	4 4%	0 0%	0 0%	0 0%	7 8%	22 25%
New employees are oriented by Area Safety Coordinators (or their supervisors) regarding safe work practices, written safety programs available on Blink, and their responsibility for attending Injury and Illness Prevention training.	18 20%	38 43%	11 12%	4 4%	7 8%	1 1%	0 0%	10 11%
Opportunities are provided for employees to attend training programs about health and safety practices.	36 40%	37 42%	6 7%	2 2%	3 3%	1 1%	0 0%	4 4%
UCSD Emergency Guides and first aid kits are readily available.	34 38%	35 39%	10 11%	1 1%	1 1%	2 2%	1 1%	5 6%

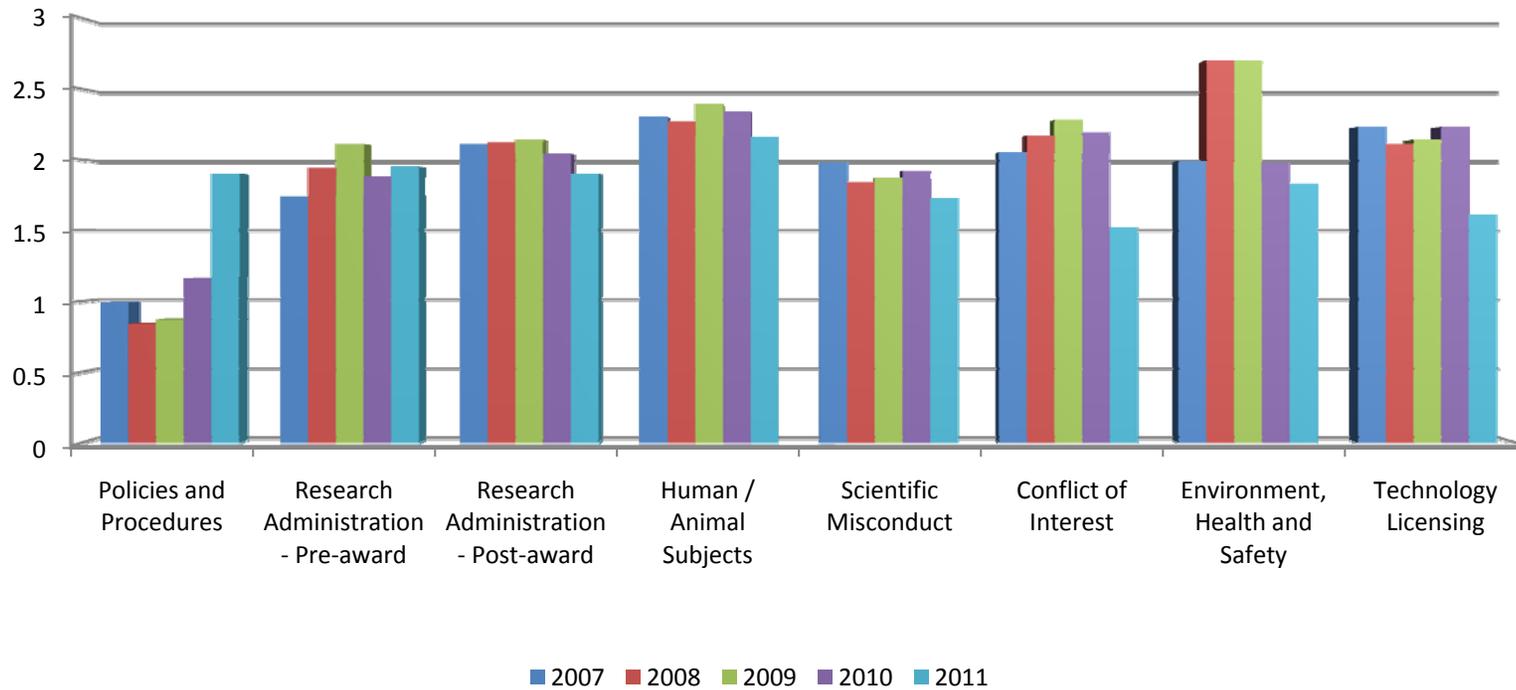
13. Environment, Health and Safety (cont'd)								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Area Safety Coordinators (or supervisors) ensure unwanted hazardous materials are disposed of promptly, including unwanted chemicals remaining when a researcher leaves his/her position within the laboratory.	10 11%	30 34%	9 10%	1 1%	2 2%	1 1%	8 9%	28 31%
Radioactive and infectious materials are secured against unauthorized removal (i.e., never left unlocked or unattended).	12 13%	26 29%	3 3%	3 3%	0 0%	0 0%	11 12%	34 38%
The campus follows established guidelines, and assures all radioactive, chemical and bio-hazardous wastes are properly prepared for disposal, labeled, and picked up by EH&S.	19 21%	31 35%	5 6%	0 0%	0 0%	0 0%	9 10%	25 28%
EH&S review and approval is obtained for all remodels and construction plans prior to start of work.	12 13%	26 29%	6 7%	1 1%	2 2%	3 3%	7 8%	32 36%
EH&S is contacted immediately whenever a regulatory agency has requested access to a workplace for inspection or review.	14 16%	28 31%	3 3%	1 1%	0 0%	0 0%	5 6%	38 43%

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14. Technology Licensing								
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Strongly Agree	Agree	Somewhat Agree	Somewhat Disagree	Disagree	Strongly Disagree	Does Not Apply	Don't Know
Intellectual property developed with University resources is disclosed by Investigators in accordance with University policy.	9	22	7	5	1	0	10	35
	10%	25%	8%	6%	1%	0%	11%	39%

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Research Compliance Composite Score Trend



Participating Departments
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2007	2008	2009	2010	2011
Dept. of Bioengineering	Center for Advanced Computational Sci & Engi/San Diego Super Computer	Computer Science & Engineering	Bioengineering	Animal Care Program
Dept. of Cellular and Molecular Medicine	Center for Energy Research	Division of Biological Sciences	Biomedical Sciences Program	Animal Welfare Program
Dept. of Pediatrics	Center for Marine Biotechnology & Biomedicine	Electrical & Computing Engineering	Calit2	Contracts and Grants
Dept. of Physics	Center for Research in Language	Center for Astrophysics & Space Science	Cellular & Molecular Medicine	Environment, Health and Safety
Dept. of Reproductive Medicine	Climate Research Division	Institute of Geophysics/Planetary Physics	Center for Energy Research	Government Research Relations
Dept. of Surgery	Department of Chemistry	Integrative Oceanography Division	Chemistry	Office of Post Award Financial Services
Grad. Sch. of International Rel.& Pacific Studies	Department of Neurosciences	Marine Biology	Geosciences Research Division	Research Ethics Program
Marine Biology Research Division	Department of Pharmacology	Physical Oceanography	Institute for Neural Computation	Technology Transfer and Intellectual Property
	Department of Pathology	Family & Preventive Medicine	International Relations and Pacific Studies	VC-Research
	Department of Psychology	Orthopaedic Surgery	Linguistics	
	Department of Radiology	Pediatrics	MAE	
	Geosciences Research Division	Center for Research on Biological Structures	Music	
	General Clinical Research		Office of Animal Resources	
	Institute for Neural Computation		Radiology	
	Institute for Pure and Applied Physical Science		Reproductive Medicine	
	School of Pharmacy and Pharmaceutical Sciences		Structural Engineering	