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**UCSB AUDIT AND ADVISORY SERVICES**

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October 12, 2010

DIRECTOR SARAH FENSTERMAKER:

Re: Institute for Social, Behavioral and Economic Research  
Audit Report No. 08-10-00012

As a part of the 2009-10 annual audit plan, Audit and Advisory Services conducted an audit of the organized research unit, Institute for Social, Behavioral and Economic Research (ISBER). Enclosed is the audit report detailing the results of our review.

The purpose of the review was to evaluate whether adequate internal controls had been implemented over monitoring of sponsored projects. The scope of the review included discussions with ISBER departmental staff, completion of internal control questionnaires, and limited testing of sponsored projects expenses for fiscal year 2008-09.

Based on the results of the work performed within the scope of the review, we did not identify any significant deficiencies or material weaknesses in internal controls. We found the department had established effective systems of internal controls over the management of sponsored projects. In addition, the department's sponsored projects are managed by staff who are knowledgeable regarding University policies and procedures and sponsor regulations. However, we noted opportunities to further improve and strengthen internal controls in the areas of cost transfers, information security policy and business continuity planning, human subjects' incentive payments, timely submission of PARs to Accounting Services and Controls, and submittal of final technical reports.

We have included a copy of our detailed observations and management corrective actions. The management corrective actions provided indicate that each suggestion for improvement in internal controls was given thoughtful consideration and that positive actions have been planned to implement the management corrective actions. The cooperation and assistance provided by ISBER staff during the review was sincerely appreciated. If you have any questions, please feel free to contact me.



Craig Whitebirch  
Director  
Audit and Advisory Services

DIRECTOR SARAH FENSTERMAKER  
October 12, 2010

Page 2

Enclosure

cc: Chancellor Henry Yang  
Associate Vice Chancellor Ron Cortez  
Vice Chancellor Research Michael Witherell  
Business Officer Jana Bentley  
UCSB Audit Committee  
Senior Vice President and Chief Compliance and Audit Officer Sheryl Vacca

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INSTITUTE FOR SOCIAL, BEHAVIORAL AND ECONOMIC RESEARCH  
AUDIT REPORT NO. 08-10-00012

**Performed by:**  
Sam Hartline, Principal Auditor

**Approved by:**  
Craig Whitebirch, Director

INSTITUTE FOR SOCIAL, BEHAVIORAL AND ECONOMIC RESEARCH  
AUDIT REPORT NO. 08-10-00012

**Purpose and Scope**

The purpose of the review was to evaluate whether adequate internal controls had been implemented over the management of sponsored projects. The scope of the review included discussions with Institute of Social, Behavioral, and Economic Research (ISBER) departmental staff, completion of internal control questionnaires, and limited audit testing of sponsored projects expenses for fiscal year 2008-09. Work was performed in the following areas:

- Management of Sponsored Projects
- Information Systems and Business Continuity
- Direct Charging Practices
- Effort Reporting
- Research Involving Human Subjects
- Cost Transfers
- Subagreements
- Overdrafts
- Charges at the end of an Award
- Sponsored Projects Closeout
- Final Technical Reports

**Background**

ISBER is the sole campus organized research unit for sponsored research in the social sciences. To a lesser extent, research is also performed through ISBER in the humanities and in other disciplines, colleges, and research units of the University. The original charge of ISBER was to serve as a major resource for basic research in the social sciences, encouraging faculty participation in interdisciplinary research. The current mission of ISBER is to provide efficient, reliable, and supportive grants administration to the campus, and to support and facilitate the development of campus research in the social sciences and across related disciplines. Recently, an additional focus in support of the ISBER mission has been to provide support to the campus in the administration of funds granted to enhance institutional educational outreach and diversity.

In fiscal year 2008-09, ISBER supported the sponsored research projects of 133 principal investigators (PIs) and co-PIs and administered 265 awards, including 115 extramural grants and 150 intramural grants, seed funding, conferences, and other awards. The total value of grants awarded through ISBER in 2008-09 was \$5.7 million and the value of multi-year grants awarded totaled almost \$24 million. Also, 124 proposals valued at \$35.2 million were submitted for funding through ISBER in 2008-09, including 93 proposals submitted by ladder faculty.

ISBER administers three internal research award programs to support promising efforts in the social sciences: the Collaborative Research Initiative Grant (C-RIG) provides funding to groups of prospective research collaborators; the Social Science Research Grants Program (SSRGP), under which awards are made on a competitive peer-reviewed basis; and the Graduate Research Award for Social Science Surveys (GRASSS). The GRASSS program's purpose is to enrich the quality of graduate survey research in the social sciences through a competitive program of awards to graduate students.

The Director of ISBER reports to the Vice Chancellor for Research and the ISBER Advisory Committee provides consultative support to the Director. ISBER administrative and financial support services are under the direction of the Business Officer and computer support services are managed by the Director.

### **Summary Opinion**

Based on the results of the work performed within the scope of the review, our review did not identify any significant deficiencies or material weaknesses in internal controls. We found the department had established effective systems of internal controls over the management of sponsored projects. In addition, the department's sponsored projects are managed by staff who are knowledgeable regarding University policies and procedures and sponsor regulations. However, we noted opportunities to further improve and strengthen internal controls in the areas of cost transfers, information security policy and business continuity planning, human subjects' incentive payments, timely submission of PARs to Accounting Services and Controls, and submittal of final technical reports.

These and other audit observations and management corrective actions are detailed in the remainder of the audit report.

## Detailed Observations and Management Corrective Actions

### A. Management of Sponsored Projects

In fiscal year 2008-09, the department received approximately \$5.7 million in sponsored project awards and administered a total of \$24 million in ongoing extramural awards. The department's sponsored projects were awarded primarily by the National Science Foundation (NSF). Audit attention focused on ensuring that there are adequate resources dedicated to managing sponsored projects and that internal controls within the department had been established to ensure compliance with University policies and procedures and external sponsor regulations.

#### 1. Managing Sponsored Projects

Our review to determine how ISBER allocates departmental resources to manage its sponsored projects included completing a Sponsored Projects Responsibilities separation of duties matrix. Based on the work performed, it appears that ISBER has been able to effectively manage its sponsored projects. Current resources dedicated to managing sponsored projects amount to 2 FTEs for pre-award and 5 FTEs for post-award. The department Business Officer indicated that use of the GUS system has enabled the department to streamline management of its sponsored projects with current staffing levels.

We also determined whether personnel within ISBER who are engaged in managing sponsored projects had attended research administration training courses, and were knowledgeable in the financial management of sponsored projects. The Business Officer indicated that ISBER staff have received training through the campus Sponsored Projects Training for Administrators in Research (STAR) training program offered by the Office of Research and through the National Council for University Research Administrators (NCURA). In addition, interactions with department staff during the review indicated employees responsible for managing sponsored projects appeared knowledgeable in University policies and practices, and with sponsor regulations.

## 2. Application Preparation and Submission

Our review indicated that ISBER had implemented adequate pre-award monitoring procedures to ensure that applications submitted to the Office of Research were submitted in compliance with UCSB's Policy on the Submittal of Proposals, Acceptance of Awards, and Administration of Contracts and Grants. In addition, a judgmental sample of 10 active awards was selected and each application submitted to the Office of Research was reviewed to verify the following:

- The principal investigator was eligible to be a principal investigator or a "Request for Exception" had been properly approved.
- The principal investigator contributed more than a minimum or nominal amount of time and effort to the project.
- Key personnel's salary included in the proposal budget agreed with their documented UCSB salary.
- The Facilities and Administrative (F&A) rate in the proposal was submitted at the current UCSB approved rate and, if not, an F&A rate reduction or waiver was completed and approved.
- Any cost sharing and matching commitments were fully disclosed in the proposal budget.
- The principal investigator properly disclosed required assurances.

The following was noted:

- In all ten cases, the principal investigator was eligible to submit a proposal, proposed more than a minimum amount of time and effort to the projects, and properly disclosed all assurances.
- In all proposals, key personnel salaries agreed with their documented UCSB salaries.
- In all proposals, the F&A rate submitted in the proposal agreed with the UCSB approved rate or rate negotiated with the cognizant agency, or an Indirect Cost Waiver form was completed and approved.
- Any cost sharing or matching commitments were fully disclosed in the proposal budget.

## B. Information Systems and Business Continuity

ISBER utilizes the Grand Unified System (GUS) for the financial management of its sponsored projects and to reconcile financial transactions to the campus general ledger. GUS is a custom database system developed at UCSB that is used to manage and maintain funding sources, purchasing transactions, liens, and other essential financial information for departments. GUS enables departments to reduce the amount of time (and cost) it takes to reconcile their financial records to the campus general ledger system by automating a significant portion of the processes. GUS also allows principal investigators easy access to real time financial information on their sponsored projects by providing web based access to financial reports and detailed transactions. Our testwork included verifying that the campus general ledger and GUS were being reconciled on a monthly basis and that reviews were adequately documented. The scope of this audit work included review and approval of the monthly Distribution of Payroll Expense Reports. Testwork indicated that the department was performing and appropriately documenting the monthly reconciliations, and had effective internal control systems in this area.

We also reviewed general information technology controls in place over ISBER computer systems, and determined that an information security policy was not in place for the department. The primary purpose of an information security policy is to establish departmental expectations regarding the security measures required for protected data/information (e.g., social security numbers, protected health information) that is maintained on departmental computers and other electronic data storage equipment. This helps ensure compliance with applicable regulations and legislation, and minimizes any associated risk.

The scope of our review did not include a specific determination as to whether any current research projects managed through ISBER were storing protected data on departmental computers. Based on discussions with the ISBER Business Officer and Systems Administrator, there are no current sponsored projects being administered through ISBER that utilize protected data stored on ISBER computers. However, the absence of a departmental information security policy provides a potential risk exposure regarding any future research projects that may utilize protected data and store that data on ISBER



computers or other department data storage devices. An information security policy could be developed for the department and appropriately disseminated to ISBER staff and faculty.

We also noted that the department did not have a formal Business Continuity plan in place to cover departmental operations. A Disaster Recovery plan for minimizing interruption to ISBER computing services in the event of a major, unpredicted business disruption had also not been developed. Adequate and organizationally supported business continuity and disaster recovery planning should be in place for all types of disruptions that include, but are not limited to, natural disasters, hardware/communications failures, internal or external sabotage or acts of terrorism, and the failure of affiliated systems or organizations. Continuity planning should embody a variety of tactics to mitigate possible risks from process and customer service breakdowns, loss of assets, regulatory liabilities, and damage to institutional reputation.

The department could develop and document a formal high-level business continuity plan for the resumption of ISBER business services in the event of an unexpected disruption. The plan should include disaster recovery planning for essential ISBER computing services. The plans should also be kept up to date, and their viability and functionality adequately assessed on a periodic and reasonable basis.

#### Management Corrective Actions

Management and security of protected data information is an important aspect of ISBER's responsible stewardship of extramural funds. Our Systems Administrator meets with and addresses these issues with individual researchers when he provisions new accounts. He also monitors files on our file server on a regular basis to ensure that there are no Social Security numbers stored. The recommendation to establish a departmental information security policy is a useful one and we will implement such a policy and distribute it to all of our Faculty, Researchers, Staff, and Student Employees by January 1, 2011.

Currently, ISBER does not have a formal Business Continuity Plan in place in the event of a destructive occurrence. However, we do have informal contingency plans in place and we have planned for basic operations to be resumed in a very short period of time. Employees are well aware of safe evacuation practices and it is established that their safety is our first

concern. Our computer system is monitored continually by our Systems Administrator and in the event that our server room is damaged, we have established procedures to convert any of our desktop systems to a server very quickly. Moreover, staff have the capability to telecommute. Back-up copies of all ISBER electronic files are stored in another building on campus. We are currently working on a formal Business Continuity Plan in the UCREADY program and expect to complete it by January 1, 2011.

C. Direct Charging Practices

A review was performed to determine how the department directly charges and allocates costs on sponsored projects. Discussions with the department indicated that it had developed business practices and internal controls to ensure that expenditures on sponsored projects are appropriate as a direct charge, charged to the appropriate fund, properly approved, and charged to the most appropriate object code. To test that controls are in place, a judgmental samples of 25 sponsored projects non-payroll charges and 10 typically F&A transactions were selected and reviewed for appropriateness. The following was noted:

*Direct Charging Practices*

- In one transaction, a multi-event guest list supporting an entertainment expenditure did not clearly indicate which guests had attended the event being charged. During the course of the audit, the auditor discussed with management that, in order to improve compliance with University Business and Finance Bulletin BUS-79, Expenditures for Business Meetings, Entertainment, and Other Occasions, the names and titles or UCSB association of each attendee at an event being claimed should be readily evident in the documentation supporting the payment.
- For all 25 transactions, the charge was not transferred or did not appear to be charged due to an overrun on another sponsored project.
- For all 25 transactions, the charge was properly authorized and approved.

*Typically F&A Charges*

- For all 10 transactions, the charges were found to be an appropriate direct charge to the sponsored project, and each charge was adequately justified and supported.

#### D. Effort Reporting

A review was performed of ISBER's processes for ensuring compliance with OMB Circular A-21 (2 CFR Part 220) and UCSB effort reporting policies and procedures. A judgmental sample of ten employees and their associated 2008-09 Personnel Activity Reports (PARs) was selected for review. Audit attention focused on determining whether:

- Procedures had been established to ensure the department was notified if a principal investigator or other key personnel specifically named in the Notice of Grant Award (NOGA) withdraws from the project, is absent during any period of three months or more, or reduces time devoted to the project by 25% or more from the level that was approved at the time of the award.
- The individual certifying the PAR had direct first hand knowledge of the employee's effort.
- Effort certified was in compliance with effort committed or the variance was justified and properly approved.
- PARs were returned to Extramural Funds Accounting (EFA) in a timely manner.
- Any departmental administrative and clerical salaries charged to federal sponsored projects were appropriate.

The review indicated that procedures were in place to ensure departmental notification when a principal investigator or other key personnel withdraws from the project or reduces their time significantly from the level approved at the time of the award. All PARs reviewed had been approved by individuals with suitable means of verification, and the effort certified appeared to be in compliance with the effort committed. Several individuals with administrative title codes were being charged to departmental sponsored projects. However, in these cases the projects were either ongoing research-related programs or large research centers where the individuals' assignments were wholly or partly exclusive to work being performed as part of the program or center; the positions were listed as key personnel in the budgets and the need for the positions justified for the relevant sponsored projects. The direct charging of salaries in these cases appeared to be appropriate, properly supported, and allowable.

In several cases reviewed, the PARs were not returned to EFA in a timely manner. Six out of thirty-seven PARs tested were submitted to EFA eight to forty-five business days past the requested due date. According to management, the PARs are sent to the employee's home department and, in many cases, the principal investigator or other academic employee's home department is not ISBER. For these PARs, ISBER administrative personnel are required to track down the employee's PAR in order to ensure it is properly prepared and submitted to EFA which adds additional time to the overall process.

Where practical, the department should enhance business practices to help ensure PARs are submitted to EFA in a timely manner.

#### Management Corrective Actions

We concur with this recommendation and note that it is our standard practice to ensure that PARs are submitted to EFA in a timely manner. Because we administer awards for multiple principal investigators who are often in the field, it can be challenging to track people down to return the PARs in an efficient manner. Nevertheless, in response to this recommendation we will enhance our practices by January 1, 2011 to follow up with researchers and collect PARs more promptly.

#### E. Research Involving Human Subjects

A review was performed to determine if adequate internal controls had been implemented over research involving human subjects. Audit and Advisory Services selected a judgmental sample of five sponsored projects involving human subjects and verified that the principal investigator had submitted and obtained an approved protocol from the UCSB Human Subjects Committee (HSC) prior to the start of any research, and that annual renewal of protocols for continuing research were submitted and approved. For each protocol, it was verified that the original signed *Informed Consent* and *Authorization for Release of Personal Health Information for Research Purposes* forms, where applicable, were documented and maintained, and that the principal investigator and research staff assigned to work with human subjects on the selected projects had completed the mandatory human subject training modules and the training was documented.

Further, we verified that internal controls were adequate over payments to human subjects by generating a listing of human subject payments (object code 7223) during 2008-09. This produced only one payment to a principal investigator for human subjects' incentives and the dollar amount of incentive payments was traced back to the approved research protocol. We also reviewed the adequacy of internal controls over the safeguarding and recordkeeping of the cash payments or gifts cards, and determined whether the human subjects documented their receipt of either cash or gift cards.

Based on the testwork performed, in each case a human subjects' protocol had been approved prior to the start of research, the protocol renewals had been submitted and approved, the original signed informed consent forms or signed debriefing statements had been maintained by the principal investigator, and key personnel on the award had undergone UCSB Human Subjects training.

For the incentive payment case reviewed, the signature of two out of six participants had been typed on the participation payment receipt form instead of being hand-written. According to management, these two students were not available for signature and had forwarded their participation payment receipt forms via email. In order to properly document receipt of gift cards or other types of human subjects' participation payments, where possible each participant should be required to provide hand-written signatures on the participation payment receipt forms prepared to document the payment. In those circumstances in which participants are unavailable for signature, an email acknowledgment sent directly from the participant should be required and attached to the payment receipt form prepared by the participant.

#### Management Corrective Actions

It is our standard practice to require hand-written signatures for human subject payments. In this particular case, we received an email and the form from the participant, as well as confirmation from the vendor that the award certificate was either received or redeemed by the participants. In the future, if a participant is unavailable or unable to provide a hand written signature, we will request an email acknowledgement sent directly from the participant stating that they are in receipt of payment. Audit and Advisory Services staff

will follow-up on this management corrective action by January 1, 2011 to ensure it has been implemented.

#### F. Cost Transfers

A review was performed of both labor and non-labor cost transfers on federally sponsored projects to ensure compliance with UCSB policies and procedures, OMB Circular A-21, and sponsor regulations. Judgmental samples of four labor and five non-labor cost transfers from 2008-09 were selected to verify that the cost transfers were performed in a timely manner, and were properly authorized and supported by an adequate justification as to why the cost was transferred and how it benefitted the project debited. The following was noted:

##### *Labor Transfers*

- For all four transfers reviewed, the payroll cost transfer was properly authorized, and the transfer appeared allowable under UCSB policies and procedures, OMB Circular A-21, and sponsor regulations. However, in three of the four cases, the payroll cost transfers were not performed within the required 120 day timeframe. In addition, it did not appear that the PARs for the relevant time periods had been adjusted and resubmitted to Accounting Services and Controls to reflect and record the change in effort as a result of the cost transfer.

##### *Non-Labor Transfers*

- For all five transactions, the transfers were properly authorized and appeared allowable under UCSB policies and procedures, OMB Circular A-21, and sponsor regulations. However, in three of the five cases, the non-payroll cost transfers were not performed within the required 120 day timeframe.
- In one instance, the justification for the cost transfer did not adequately explain the methodology for allocation of a portion of the original charge to the project being debited. Business and Finance Bulletin A-47 (A-47), "University Direct Costing Procedures" requires that, if transferring a fractional amount, the transfer request "must contain an explanation supporting a reasonable and equitable method of allocation." Documentation supporting the transfer contained no detailed support for the expense allocation methodology.

To strengthen internal controls over cost transfers and improve compliance with A-47, the department should provide a full explanation for allocating a portion of an expense that details a reasonable and equitable method for the allocation. Also, the department should develop business practices to identify when PARs needs to be recertified as part of a labor cost transfer adjustment. The new PAR should be resubmitted to Accounting Services and Controls.

#### Management Corrective Actions

The issue of processing late cost transfers is an area where ISBER has made great progress over the last few years. We have reduced, if not completely eliminated, the need to process late transfers in large part by the implementation of GUS and the ability to automate financial reports and submit them electronically to all principal investigators. GUS has also served as a useful tool to increase communication with the principal investigators in a number of respects, including their timely review of expenditures. This message has been emphasized further through the dissemination of a memo from both the Executive Vice Chancellor and the Vice Chancellor of Research in July 2010 to the campus explaining that late transfers on contracts and grants will no longer be acceptable.

In reference to the methodology for allocation of a portion of an expense that was transferred, the expense was for a consultant working on a research project. The research project had funding from two sources (NSF & The Packard Humanities Institute). The portion transferred was to the Packard award. As previously mentioned, both awards supported the same research project. Therefore, in this case it would be difficult for the PI to supply methodology for the allocation. Nevertheless, staff responsible for processing transfers will be reminded to provide full explanations in the future to ensure compliance.

In response to the audit recommendation to identify when a PAR needs to be recertified, this too is an area where ISBER has made great strides through the implementation of GUS and new procedures implemented on campus. With the timely review of expenditures and the encouragement from the Vice Chancellors, it is now extremely rare that there would be a need to process payroll transfers (UPAYs) beyond the period for which PARs are generated. Since PARs are generally disbursed for payroll periods occurring six months

prior to the current payroll, it would be rare that a recertified PAR would be necessary. This aspect has been further improved as a result of a memo disseminated by Accounting Services and Controls to the campus in July 2010 implementing a new policy whereby Accounting will no longer process payroll transfers (UPAYs) without a revised PAR. These new campus requirements have further strengthened our internal control structure. We implemented the new procedures immediately and will continue to follow them in the future. Audit and Advisory Services staff will follow-up on this management corrective action by January 1, 2011 to ensure it has been implemented.

#### G. Subagreements

A review was performed to determine if ISBER had implemented procedures to monitor subagreement costs to ensure compliance with applicable Federal requirements. A judgmental sample of five subagreement invoices (object codes 7300 and 7305) was selected to verify compliance. Based on the testwork performed, the department had effective business practices over their subagreements. The following was noted:

- In all cases where applicable, the Cost/Price Analysis and Related Information Subagreement Closeout Certification Forms were prepared and signed by the principal investigator.
- In each case where applicable, a Subrecipient Commitment Form had been properly prepared and approved.
- In four cases, a Certificate of Compliance with OMB Circular A-133 was applicable and had been completed.
- For all five invoices, the period invoiced was within the period of the subagreement, and the total value of the invoices did not exceed the total amount obligated by the subagreement.
- F&A costs were appropriately charged in all cases, where applicable.
- In all five invoices, the principal investigator indicated that the invoiced costs were reviewed for allowability and reasonableness.

#### H. Overdrafts

To ensure that internal controls over monitoring sponsored projects spending were effective, a summary of all sponsored projects overdrafts within the department as of June



30, 2009, was prepared to determine the value of overdrafts. The reasons for all overdrafts were obtained and reviewed. Testwork indicated that the department had only one account in overdraft status at June 30, 2009, in the amount of \$739. The overdraft was due to the processing of several expenditures with the incorrect funding source, and an appropriate correction was subsequently made to clear the overdraft.

In addition, the Business Officer indicated that GUS is a valuable tool for monitoring sponsored projects spending to help reduce potential overdraft situations and that the system has enabled ISBER to stay on top of their general ledger reconciliations so that all accounts are reconciled by the 15<sup>th</sup> of each month.

I. Charges at the End of an Award

To determine if charges at the end of awards were appropriate, a judgmental sample of five awards with expired award dates during fiscal 2008-09 was selected for review. The awards were examined for large cost transfers within the last month of the award period and large expenses within the last 90 days of the award period. The cost transfers and large expenses were examined to determine whether they were appropriate. For all five awards, there were no large cost transfers within the last month of the award period and those expenses reviewed at the end of the award period appeared appropriate.

J. Sponsored Projects Closeout

To ensure that the department had established procedures to monitor award end dates and assist EFA in closing out all associated funds, we reviewed all awards with inactive end dates that had not been closed out as of June 30, 2009. Testwork included determining whether all cash had been received on current expired awards and whether the funds were closed out. The auditor also determined why any unclosed awards had not been closed out. Testwork indicated that all cash had been received and that the department's expired awards were all closed at the time of our review.

K. Final Technical Reports

Principal investigators are responsible for preparing and submitting sponsor-required final technical reports. To determine whether principal investigators are submitting technical reports in accordance with federal, sponsor, and UCSB policies and procedures, we selected

a judgmental sample of five awards and reviewed them to verify that the final technical reports were submitted in a timely manner. The following was noted:

- In four of the five instances, the final technical reports were submitted in a timely manner.
- In one instance, the final technical report was submitted 38 days after the due date.

Late or missing final technical reports can trigger audits and can also result in the University not being able to obtain payment of final invoices. Late reports can also result in a sponsor refusing to accept proposals from the principal investigator with a late report. The department indicated that it currently performs a quarterly review of the status of final technical reports as a part of its award close-out procedures, utilizing technical report due date information contained in the ORbit system. In those cases in which a report is greater than 30 days overdue, departmental administrative staff will contact the principal investigator to inform him or her of the late status of the report and that the Office of Research should be contacted if the report is not ready for immediate submission.

To strengthen internal controls over submitting final technical reports in a timely manner, principal investigators should consider tracking due dates for their final technical reports within GUS. In addition, the department could determine if a field can be added to GUS so that principal investigators can indicate when final technical reports were submitted to the sponsors. A report could then be generated from GUS that would indicate past due final technical reports, and departmental administrative staff could follow-up with the principal investigators to make sure the reports are submitted. For reports not submitted within a certain time period, the Director could be notified so she/he could talk directly with the award's principal investigator.

#### Management Corrective Actions

This is another area where vast improvements have been made through the utilization of GUS and other campus systems. There is a field in GUS that we often use to document reporting information. The reporting deadlines are listed as reminder information on the principal investigators' monthly financial reports. PIs generally work directly with their Program Officers and prefer to submit their final technical reports to the agency themselves.

At times, it is necessary for ISBER administrators to follow up with the researchers to obtain a copy for our files and the Office of Research at the time of close-out. We have implemented the use of a reporting feature in the Sponsored Projects database on a quarterly basis to monitor delinquent reports and then work with the PI to ensure that the final reports have been submitted. However, in response to the audit recommendation we will utilize the information in the Orbit system on a monthly basis and will fully implement the use of GUS to track information of final technical reports by June 30, 2011. In the event that a report is delinquent, ISBER Administrators will be instructed to notify the Director for further action.