### ANALYSIS OF MAIN CAMPUS RESEARCH OUTSIDE STUDY GROUP RECOMMENDATIONS

### THE UNIVERSITY OF NEW MEXICO

Report 2008-12 May 9, 2008



**Audit Committee Members** 

Raymond Sanchez, Chair John M. "Mel" Eaves, Vice Chair Carolyn Abeita

Audit Staff

G. Christine Chavez, Director Yvonne Cox, Audit Manager Pamela S. Losinski, Senior Auditor

# CONTENTS

EXECUTIVE SUMMARY
INTRODUCTION
BACKGROUND
PURPOSE
SCOPE
OBSERVATIONS, RECOMMENDATIONS AND RESPONSES 4
OPERATIONAL INFRASTRUCTURE
PRE-AWARD SERVICES AND ADMINISTRATION4
POST AWARD ADMINISTRATION
PROJECT INTEGRITY
SUMMARY TABLE
CONCLUSION
APPROVALS
Attachment A

# **ABBREVIATIONS**

Board of Regents	The University of New Mexico Board of Regents
CGA	Contract & Grant Accounting
ERAC	Executive Research Advisory Committee
HSC	Health Sciences Center
IA	Internal Audit Department
NCURA	National Council of University Research Administrators
OVPRED	Office of the Vice President for Research and Economic Development
RSG	Research Study Group
SPS	Sponsored Project Services
University	The University of New Mexico
UNM	The University of New Mexico
F & A	Facility & Administrative Overhead

# **EXECUTIVE SUMMARY**

The University of New Mexico Board of Regents requested an audit to analyze the Office of the Vice President for Research and Economic Development's (OVPRED) finances due to the alleged budget deficiency. Management and the Internal Audit Department (IA) identified five objectives for the audit. The first four objectives were addresses in the *Audit of Main Campus Research Business Practices and Processes, Report 2008-08.* The final objective of the audit is to determine if the recommendations made by the research study groups are feasible and cost effective.

We found management has made progress in incorporating many of the recommendations made by both study groups. The study group recommendations, and report, have increased the communication between the faculty and administration to improve the processes and cost effectiveness of the operations. In some cases, management is conducting further analysis and review prior to making the recommended changes. Internal Audit agrees with the actions that management has taken to date and the judgment they have shown in pursing further analysis and in some cases, in not implementing some of the recommendations due to the increased risk that would not be cost effective. Internal Audit also agrees with the Executive Research Advisory Group (ERAC) in that although progress has been made, there are still problems in research administration that ERAC continues to monitor on an on-going basis. In addition, Internal Audit agrees with management in that some of the decisions should be postponed so that the new Vice President for Research can make the changes. Internal Audit is not making management recommendations that need to be followed-up for this report.

In Attachment A at the end of the report, we offer the details of each recommendation, the Internal Audit Department opinion on the recommendation, and management's plan for addressing each recommendation.

# INTRODUCTION BACKGROUND

The University of New Mexico Board of Regents requested an audit to analyze the Office of the Vice President for Research and Economic Development's (OVPRED) finances due to the alleged budget deficiency. The OVPRED is responsible for the main campus research efforts, which include funded research, funded instruction, and funded public service. The purpose of our audit was to review the OVPRED financial operations, business practices and processes, including business and budget models; to compare them with our peer institutions and the Health Sciences Center research function; and, to provide recommendations for improvements. Management and the Internal Audit Department (IA) identified five objectives for the audit. The first four objectives were addresses in the *Audit of Main Campus Research Business Practices and Processes, Report 2008-08*.

The final objective of the audit is to determine if the recommendations made by the research study groups are feasible and cost effective. Two study groups evaluated the research function and issued reports on their findings:

- The National Council of University Research Administrators (NCURA) completed a peer to peer review. It was NCURA's first peer review. They reviewed the main campus research function and issued its report on May 30, 2007.
- The University of New Mexico (University) Research Study Group (RSG), a group of University faculty and administrators, also reviewed the main campus research function and issued its report on August 19, 2007.

The reports made recommendations in four general categories: Operational Infrastructure, Pre-Award Services and Administration, Post-Award Administration, and Project Integrity. The Health Sciences Center (HSC) research function was not evaluated by either study group. In a Summary Table at the end of the report, we offer the details of each recommendation, the Internal Audit Department opinion on the recommendation, and management's plan for addressing each recommendation.

### PURPOSE

The purpose of our analysis was to review the recommendations made by both the NCURA and RSG study groups, receive management input and status, and determine if recommendations made by the research study groups are feasible and cost effective.

### SCOPE

This report covers the last objective: the analysis of the recommendations made by the research study groups. The first four objectives were addresses in the *Audit of Main Campus Research Business Practices and Processes, Report 2008-08.* 

#### INTRODUCTION

To meet the analysis objectives:

- we reviewed and summarized the recommendations made by both NCURA and the RSG,
- we interviewed various University employees to get the management status on the recommendations,
- we met with faculty and administrators on the RSG,
- we met with faculty and administrators on the Executive Research Advisory Committee (ERAC), and,
- we performed an analysis and documented the Internal Audit Department opinion on the Summary Table.

The fieldwork was completed on May 1, 2008.

# **OBSERVATIONS**

### **OPERATIONAL INFRASTRUCTURE**

This section of the NCURA and RSG reports included recommendations regarding:

- combining areas,
- changing reporting structure,
- hiring additional personnel,
- creating a faculty advisory committee,
- increasing training opportunities, and,
- developing a working relationship between the research function and the departments, centers, and colleges.

In general, the Internal Audit Department (IA) agrees with the recommendations. Management is working to address the concerns raised through the recommendations. IA has no opinion on several reorganization issues because they could be structured in different ways; we agree with management in waiting for the new VP for Research to make these decisions because it will be cost effective. IA agrees with the changes management has made to combine all of the non-financial compliance groups and to have CGA reporting to an individual with dual reporting to both the finance and the research functions.

In our peer review, 100% of other universities had their pre-award functions reporting to the research function. University management has moved the SPS reporting for management purposes from research to finance.

### PRE-AWARD SERVICES AND ADMINISTRATION

These recommendations were made specifically regarding Sponsored Projected Services (SPS). SPS takes the award, normally a contract or grant, from the submission by a researcher (*e.g.*, faculty member) to a negotiated award with the University. IA agreed with all of the recommendations. Many of the recommendations have not been implemented because the management structure was changed and the staff is not yet stabilized under that structure.

### POST AWARD ADMINISTRATION

At the University, post award administration is referred to as Contract and Grant Accounting (CGA). CGA handles the financial services aspect of the award after it has been funded. IA and management agree with the recommendations to improve customer service, provide smoother transitions between SPS and CGA, and provide more training for staff.

IA disagrees with the recommendations and agrees with management, in reducing controls in some areas because of the increase in risk. Management has agreed to expand the dollar limits and begin to move some of the review from a pre-purchasing review to a post-purchasing review.

OBSERVATIONS

Although many of the post award changes are in varying stages of completion, IA believes that management is working diligently with faculty and the Executive Research Advisory Committee (ERAC) committee to comply with the study group recommendations while maintaining the necessary internal controls.

### **PROJECT INTEGRITY**

IA agrees with, and management has completed, all of the recommendations regarding project integrity, except the recommendation regarding the Conflict of Interest (COI) process. In regards to the COI process, IA has no opinion. Management has reviewed and modified the process. Any changes in policy would be completed by the Research Policy Committee which is not under the jurisdiction of the OVPRED.

### SUMMARY TABLE

See Attachment A for details on the NCURA and RSG recommendations, the IA opinions, and management's plan for addressing each recommendation. Some of the management actions are at the initial preliminary/planning stages and some of the tasks have been completed. Management's plan and the processes that are in-progress indicate that increased communication is contributing to improved operations.

# CONCLUSION

In summary, management has made progress in incorporating many of the recommendations made by both study groups. The study group recommendations, and report, have increased the communication between the faculty and administration to improve the processes and cost effectiveness of the operations. In some cases, management is conducting further analysis and review prior to making the recommended changes. Internal Audit agrees with the actions that management has taken to date and the judgment they have shown in pursuing further analysis and in some cases, in not implementing some of the recommendations due to the increased risk that would not be cost effective. Internal Audit also agrees with the Executive Research Advisory Group (ERAC) in that although progress has been made, there are still problems in research administration that ERAC continues to monitor on an on-going basis. In addition, Internal Audit agrees with management in that some of the decisions should be postponed so that the new Vice President for Research can make the changes. Internal Audit is not making management recommendations that need to be followed-up for this report.

## APPROVALS

G. Christine Chavez, CPA Director, Internal Audit Department

Approved for Publication bair. Andit ommittee

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/				
1.00	Recommendation	Recommendation	Recommendation	In-progress				
0			Recommendation					
Ope	Operational Infrastructure							
1	Combine pre-award (SPS) and post-award services (Contract & Grant Accounting (CGA)) into a single office of sponsored programs under the Office of the Vice President for Research and Economic Development (OVPRED).	Team concept for sponsored-project administration, involving SPS, CGA, and unit research administrators. Restructuring of main campus research administration. Managerial restructuring of OVPRED around two major functions, sponsored-project administration and research development.	Agree. The OVPRED should have some management oversight responsibility for CGA; however, there are many ways this could be structured including the current structure.	The offices have not been combined under OVPRED; however, both SPS and CGA now report to the Interim Associate VP for Research Administration. The Interim Associate VP for Research Administration has dual reporting to the Interim VP for Research and the VP for HSC/ UNM Finance and University Controller (VP for Finance) and reports administratively to the VP for Finance. CGA has dual reporting to the VP for Finance and the Interim Associate VP for Research Administration. Any further reorganization should be addressed by the permanent VP for Research and the VP for Finance.				
2	Recruit and hire an Associate Vice President for Research Administration to lead the consolidated office.		Agree. Both SPS and CGA should report up to a higher- level employee for the research mission.	An Interim Associate VP for Research Administration has been hired for this position.				
				CGA has dual reporting to the VP for Finance and the Interim Associate VP				
				for Research Administration.				

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
3	Centralize the non-financial compliance functions under a new Office of Research Compliance.		Agree. IA recommended that the University management consider further consolidation of the main campus research compliance function with HSC (this was recommended in the University Governance, Report 2005-15 and again in the Audit of Main Campus Research Business Practices and Processes, Report 2008-08.	The compliance for both human and animal subjects has been consolidated under the Health Sciences Center Vice President for Translational Research. The HSC and main campus Conflict of Interest reports to the Executive Vice President for Academic Affairs/Provost. The Ethics Training and Export Control will report to the main campus VP for Research.
4	Address the needs of the SPS.		Agree. The OVPRED should address the needs of SPS.	The OVPRED hired an Interim Associate VP for Research Administration and a Manager for SPS. The OVPRED had two completed posting and additional compensation for current employees. In 11/07, new management postponed the additional hirings and increased compensation. In 3/08, the Interim Associate VP for Research Administration filled the two positions and the Manager position.
5	Create a Faculty Advisory Committee for the consolidated Office of Sponsored Programs.	Faculty-staff Executive Research Advisory Committee (ERAC) to monitor and advise research administration.ERAC to request and receive reports on OVPR plans and the status of research initiatives and sponsored-project administration.ERAC to report to the Provost/Executive Vice President for Academic	Agree. IA agrees that an advisory committee consisting of members of the faculty and college administrators would benefit the process in allowing faculty to have input into research decisions. IA noted, from meeting with Health Science Center (HSC) management, that their "top slice" committee's membership consists of higher level administrators (Dean's level). This may be more effective in supporting and/or making	An Executive Research

RecommendationRecommendationIn-progressAffairs and the Executive Vice President for Administrative Affairs.decisions regarding the budgets. The Deans are responsible for fiscal matters so they are in a position to make decisions which impact their budgets. IA recommended a "top slice" committee for main campus that would include the Provost, VP for Research, and Dean-level representation in the Audit of Business Practices and Processes, Report 2008-08.6Authorize additional opportunities for professional development and training.Agree.The new budged and CGA inclu- monies for trav training.7Develop strong partnerships withAgree.SPS and GGA	
Affairs and the Executive Vice President for Administrative Affairs.decisions regarding the budgets. The Deans are responsible for fiscal matters so they are in a position to make decisions which impact their budgets. IA recommended a "top slice" committee for main campus that would include the Provost, VP for Research, and Dean-level representation in the Audit of Main Campus Research Business Practices and Processes, Report 2008-08.6Authorize additional opportunities for professional development and training.Affairs and the Executive Vice President for Administrative Affairs.Affairs are responsible for fiscal matters so they are in a position to make decisions which impact their budgets. IA recommended a "top slice" committee for main campus that would include the Provost, VP for Research, and Dean-level representation in the Audit of Main Campus Research Business Practices and Processes, Report 2008-08.6Authorize additional opportunities for professional development and training.The new budge and CGA inclu monies for trav training.	
opportunities for professional development and training. and CGA inclu- monies for trav- training.	
7 Develop strong partnerships with Agroa SDS and CGA	ıdes
Agree. Agree. SPS and GOA a working with th Research Admin Network (RAN addition, they a developing an i website and tra the RAN at the level.	he inistrator's I). In ure improved ining for
Vice President for Research to report to the Provost/Executive Vice President for Academic Affairs.No Opinion. In our review of peer institutions, we found that 56% (9 of the 16) peer institutions' research offices report to the Provost or comparable position similar to UNM and the other 44%, (7) report to the President of the institution.The OVPRED to report to the Provost/Execut Academic Affa	Interim ive VP for
Office of the Vice President for Research (OVPR) to have two co- equal Associate Vice Presidents, one for Research Administration (AVP/RA) and one for Research Initiatives (AVP/RI)No Opinion. Agree to delay further restructuring until the 	Economic lirect terim or inistration for tives. We the "plan" the VP for ion is filled g any
changes.	

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
		<ul> <li>organize resources for funding research investments,</li> <li>support large research initiatives, assisted by the Director of Research Development Services,</li> <li>supervise research centers that report to the OVPR, and</li> <li>manage resources for cost shares and startup funds.</li> <li>AVP/RA to supervise main pre-award office, SPS, assisted by a Director or Manager of SPS, and in this capacity to report to VPR.</li> <li>AVP/RA to supervise main post-award office, Contract and Grant Accounting (CGA), assisted by the Associate Controller and the Manager for CGA, and in this capacity to report to Executive Vice President for Administrative</li> </ul>	Recommendation         further restructuring until the         new VP for Research position is         filled.         No Opinion. Agree to delay         further restructuring until the         new VP for Research position is         filled.	Services (RDS) reports directly to the Interim VP for Research and Economic Development. RDS assists researchers by identifying resources and potential funding sources; provides training; advises multidisciplinary teams; supports large and complex proposal efforts and collaboration between researchers from different disciplines and fields. Again, we understand that the "plan" is to wait until the VP for Research position is filled prior to making any additional infrastructure changes. The Interim Associate VP for Research Administration has dual reporting to the VP for Finance for the CGA portion, and to the Interim VP for Research and Economic Development for the SPS portion.
		Affairs. AVP/RA to co-ordinate development of research- support staff in the units and to develop team concept for research administration.	Agree.	The Interim Associate VP for Research Administration and the Director for Financial System & Restricted Accounting are working with the RAN to provide additional training to accomplish this recommendation.

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
II.	Pre-Award Services (S	PS) and Administra	ation	
1	Review existing policy and develop standard operating procedures.	Document institutional memory of written policies and procedures for pre-award administration.	Agree. OVPRED should work with the Research Policy Committee to review the existing research policies. Agree. SPS should develop written operating procedures for their internal processes and functions.	The Interim VP for Research and Economic Development will work with the Research Policy Committee for any revisions to current policy and all future research policies. The OVPRED does not have control and/or oversight over the Research Policy Committee. The Interim Associate VP for Research Administration stated that SPS will write current operating procedures during the next six months.
2	Improve access to information for Sponsored Projects Services.	Commitment to customer service in sponsored- project administration. New leadership for sponsored-project administration, working in partnership with dedicated and receptive staff in SPS, CGA, and the units, to instill commitment to customer service throughout the operation. One-stop, up- to-date, accurate web page that includes both pre- and post-award and that includes all information for proposal development, submission, and award management.	Agree.	SPS and CGA are working with RDS (Research Development Services) to update the website. In addition, they are working with the new Financial Services Customer Service group to provide increased customer service.

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
3	Improve information sharing among campus units.		Agree.	SPS, CGA, and Purchasing are working together with RAN and ERAC to evaluate the research functions. In addition, both SPS and CGA have committed to teach several two-hour courses to the RAN membership on their areas and functions to share information among the units.
				Financial Services is conducting group interviews, which will assess the training, reporting, and process improvement needs of the finance community. It is the focus of this team to involve the finance community, in sharing information, throughout this process to ensure efficient and effective results.
4	Establish decision-making and authority within Sponsored Projects Services in order to respond to immediate needs.	New leadership and additional resources for Sponsored Projects Services (SPS). New leadership through the creation of two positions, the AVP/RA and a new Director or Manager of SPS, reporting to the AVP/RA, to supervise the office. Changes in sponsored-project administration.	Agree. SPS should have a qualified authorized SPS employee with authority to make necessary decisions. Agree. Would defer the infrastructure design to the new VP for Research and Economic Development.	This has been facilitated by the hiring of the Interim Associate VP for Research Administration and the SPS Manager – and will continue to be monitored through data collection and the performance review process.
		New resources of personnel, compensation, training, and IT support.	Agree. IA recommends that the University Human Resources Department evaluate if the current employees should receive additional compensation. Agree. Provide additional training for employees as	The OVPRED hired an Interim Associate VP for Research Administration and a Manager for SPS (approximately \$223,000 annually for these two positions).

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
			needed. IA recommended in the Research audit (IA report number 2008-08) that SPS re- locate to share space with RDS. Currently, the OVPRED IT staff reside and report to RDS. Therefore, this recommendation may resolve the issue.	In 3/08, the Interim Associate VP for Research Administration hired the two positions and a new Manager. They are also developing career paths and providing training for the staff.
III.	Post-Award (CGA) Adn	ninistration	I	
1	Provide greater flexibility for sponsored project administrative issues in developing campus fiscal policies and procedures.		See answer for #2.	
2	Conduct a risk assessment to evaluate the current pre-audit review process.	More flexible approach to post-award fiscal management in Contract and Grant Accounting (CGA). Post-transaction review of financial transactions to remove delays in executing such transactions. Review of policies and procedures of the Purchasing Department, including those for P-cards, to identify and remove bottlenecks.	Does Not Agree as stated. Agrees with the need for CGA to work with faculty. In the review of the status to date, UNM Financial Services management is evaluating the situation and making changes where possible without eliminating the necessary internal controls. Management needs to maintain the balance between research and faculty needs against fiscal responsibility.	UNM Financial Services have raised the requisition level up to \$5000 for goods and \$2500 for limited services, where they perform the review after the transaction has been incurred (post review) versus before the expense has been made (pre review). The Director of Financial Systems and Restricted Accounting is working with Purchasing and other Financial Services departments to generate and accumulate data to analyze the purchasing queue times for each phase of the purchasing approval process. In addition, they are looking at the error rates/corrections as part of this evaluation. The P-card is already a post review process. Financial Services is working with the ERAC sub-committee to consider

No.	NCURA		Internal Audit Opinion of	Management Plan/	
	Recommendation	Recommendation	Recommendation	In-progress	
				increasing the thresholds for "post" review versus "pre" review of transactions.	
3	Clarify roles and responsibilities for sponsored project administration.		See answer for #4.	This will be addressed through training and clarifying the duties/divisions on the website.	
4	Improve campus units' understanding of sponsored project administration.		Agree.	CGA is working with SPS and RDS to make the University research website more "customer friendly" and provide additional information to the faculty and staff. Financial Services is considering publishing a quarterly newsletter to inform faculty and staff about research issues. There are research banner job aids on "my unm" – that faculty and staff may not be aware of. The University Finance area is establishing a Finance Customer Service Center. This should decrease the amount of time that the CGA accountants are interrupted from their work and should provide them more quality time to complete their work (including billings, close- outs, etc.). CGA is also using "in processes.	

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
5	Increase the training of CGA staff to improve understanding of current developments and customer service.		Agree and refer to management plan for #4 above.	To improve customer service, all of the Financial Service employees will have the responsibility to know the top 30 FAQs and answers as part of their performance evaluation goals for 2008. In addition, all of the accountants are required to visit the departments annually. This is a performance goal for CGA accountants. CGA and SPS already visit each branch annually to meet and answer questions.
6	Develop better hand-off between SPS and CGA for set-up of new projects.		Agree.	The new Interim Associate VP for Research Administration is facilitating the hand-off between SPS and CGA for new awards. CGA will be developing work flow in Banner to facilitate the set ups. They are working with SPS for the hand-off of the award from the proposal stage through setting up the indexes and getting the signature authorization forms. In addition, main campus and HSC are evaluating the possibility of interfacing between Info Ed (proposal software) with Banner (CGA financial software system).
7	Delegate signatory authority.		Does Not Agree because the current process appears to be working.	Three individuals in Financial Services are available to sign every contract. The contracts

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
			working.	are normally signed within 24 hours after they are completed. The Director of Financial Systems and Restricted Accounting believes the internal control in having one financial person review the contract, without delay to the award, is not a hindrance to the University.
8	Review budget set-up and maintenance, and reduce budget requirements.		Does Not Agree because the University has a responsibility to monitor the use of funds.	CGA does not have the flexibility, nor would the University want to lose the institutional control, within the department to allow some awards to have no budget restraints because they have expanded authority. The departments all need to set up budgets on how they intend to spend the funds. If there are adjustments to the budgets, based on spending or errors in the original budgets, the budgets can be adjusted/modified. In some cases the funding agencies need to be notified and approval received, and in other cases, it is just a budget adjustment.
9	Develop campus training and improved reporting tools for the Banner software.		See answer for #10.	
10	CGA-related sponsored programs administration needs to be an active voice in continuing Banner implementations and configurations.		Agree. We learned that the campus community may not be aware of Banner job aids that are available.	CGA is meeting regularly with the Research Administrator's Network (RAN) to provide training. They are currently working to schedule several two-hour

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
				sessions on SPS and several two-hour sessions on CGA. In addition, they are working together to provide additional training to allow the research administrators to get certified at increasing levels of training and knowledge.
		Review of procedures for index-code assignment, budget revisions, invoicing of research sponsors, and close-out of sponsored projects to ensure timely performance.	Agree.	CGA is testing "work flow" to facilitate close- outs. This helps track the award and the CGA will get notification of the close date and will make a decision to either extend or close-out the contract or grant. Then the award moves into the close-out phase for processing final documents.
IV.	Project Integrity			
1	Centralize the non-financial functions under a new Office of Research Compliance (see recommendation 3 under Operational Infrastructure).	Consolidation and streamlining of all non financial compliance functions.	Agree. Internal Audit recommended that University management consider further consolidation of main campus with HSC (this was recommended in the University Governance, Report 2005-15 and again in the draft of the Audit of Main Campus Research Business Practices and Processes, Report 2008-08.	The compliance for both human and animal subjects has been consolidated under the Health Sciences Center Vice President for Translational Research. The HSC and main campus Conflict of Interest reports to the Executive Vice President for Academic Affairs/Provost. The Ethics Training and Export Control will report to the main campus VP for Research.
2	UNM needs to clearly identify the ownership and responsibility for university non-financial compliance policies – due to "fragmented structure" staff		Agree.	See information above.

No.	NCURA Recommendation	RSG Recommendation	Internal Audit Opinion of Recommendation	Management Plan/ In-progress
	unclear about non-financial compliance policies and should have this knowledge.	Kecommendation	Kecommendation	In-progress
3	<ul> <li>Roles and responsibilities need to be defined for:</li> <li>compliance committees,</li> <li>staffing of the compliance area, and,</li> <li>compliance responsibilities between the main campus and the Health Sciences Center.</li> </ul>	The Compliance Office Director should have dual report to VPR and VP Translational Research (HSC).	Agree.	See information above. In addition, the COI committees have been separated (main campus versus HSC) and responsibilities clarified.
4	Non-financial compliance needs to be directly involved in university discussions concerning disaster planning.		Agree.	The Interim VP for Research is a member on the Emergency Operations Center (EOC).
5	The Conflict of Interest process needs to be reviewed and modified.		No Opinion	The Conflict of Interest (COI) process has been reviewed and modified by management. Main campus and HSC now have separate committees with an independent review committee. In regards to new, potentially more efficient policies/changes in having a blanket COI form for each PI versus the form for each project/award – this has not happened. The OVPRED administration does not have control and/or oversight over the Research Policy Committee.
6	UNM should explore the need for a chemical safety committee.		Agree.	Pursuant to the Director of Safety and Risk Services, a working group is developing the Homeland Security

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
				Criteria and responding to immediate concerns. In addition, Safety and Risk Services expects to add another committee that will meet quarterly to control budgets and set policy.
7	The non-financial compliance staff, and committee chairs, should meet periodically to discuss cross-compliance issues.		Agree	The compliance for both human and animal subjects has been consolidated under the Health Sciences Center Vice President for Translational Research. The HSC and main campus Conflict of Interest reports to the Executive Vice President for Academic Affairs/Provost. The Ethics Training and Export Control will report to the main campus VP for Research. This above change was made effective April 21, 2008. The VP for Translational Research stated that they would be holding a "series of meetings with members of the IRB, IACUC, Main Campus departments, and investigators in order to identify areas for continued improvement in the operations of the compliance units."
8	Through a more unified organization for non-financial compliance, the University could consider promoting information and education on responsible conduct of research.		Agree.	At the request of the President and Interim Vice President for Research, a Special Assistant to the VPR has been designated to develop and promote information and education on responsible

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
				conduct of research. This will be in the form of seminars and symposia, investigator training, research ethics courses, modules for training new faculty/graduate students and grants managers, and facilitation of campus- wide communication with all research ethics stakeholders (including faculty, students, staff, departmental chairs, deans, compliance committees, community members, and administrators) regarding issues and services of a research ethics program.
V. (	Other			
1		University-wide rationalization of and participation in research- administration budget processes.	Agree. Concept of "top slice" used at HSC, which includes input from the Dean level and other high level administrators and financial personnel (to be chosen by the Interim Provost) appears feasible. IA does not necessarily agree with "open" input.	The OVPRED may adopt the "top slice" budget model with a high-level committee providing input and advisory services.
		University Counsel's Office to assign at least 1.0 FTE attorney to advise OVPR on legal issues in research administration.	Agree.	The OVPRED has 1.0 FTE attorney and the Interim Associate VP for Research Administration is working with University Counsel to get improved services.
		OVPR to be consulted for research perspective when internal University policies are being formulated.	Agree.	The Interim VP for Research and Economic Development currently has knowledge and the opportunity to provide feedback from his position on the Executive

No.	NCURA	RSG	Internal Audit Opinion of	Management Plan/
	Recommendation	Recommendation	Recommendation	In-progress
				Cabinet and his working relationship with the Director of the University Policy Office. In addition, the University Policy Office sends an email announcement to all faculty and staff informing them that a proposed policy is available for a 30-day review and comment period.
		Well-trained research- support staff members available in the units— Colleges/Schools, departments, and research centers and institutes—to interface between each faculty member and the central research administration.	Agree.	Additional staff training through RAN is covered in the SPS and CGA sections.