AGENDA

- Introductions
- Project Controls: Eleni Ryals
- Hiring Practices Post OFCCP Audit: Jean Mansfield & Christina Tocci
- Project Plan: Pete Paskevich
- Research Administration Advisory Committee: Pete Paskevich
- Open Forum: All
McLean DRAW

PeopleSoft Project Controls

03/15/2011


**Agenda**

- Why Project Controls?
- What is Project Controls?
- How will Project Controls Work?
- Screenshots
- Highlights from Testing
- Feedback from Pilot Groups
- Next Steps
Why Project Controls?

- Departments have expressed frustration in getting grants closed
  - Project Controls is a direct response to frustration
- Assists Research Management in Closing Research Grants in a timely manner
  - Meets compliance requirements
- Control Research Spending at time of Project End
  - To minimize deficit spending
What Is Project Controls?

- Project Controls is functionality within PeopleSoft that is activated based on the project end date of the fund number.
- This functionality triggers “warning messages” and/or stops transactions from being processed or entered in sub systems:
  - AP transaction
  - PO transactions
  - EBuy requisitions
  - Expenses’ transactions

- HR, Payroll and General Ledger (journal entry) transactions are not impacted by Projects Controls for this phase of the implementation.
How Will Project Controls Work?

- Utilization of Project Status functionality to ‘warn’ and ‘stop’

<table>
<thead>
<tr>
<th>Grant Lifecycle Phase</th>
<th>Business Impacts</th>
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<tbody>
<tr>
<td>Grant at project end date within 30 days</td>
<td><strong>30 day Warnings for:</strong></td>
</tr>
<tr>
<td></td>
<td>All PO &amp; AP Functions</td>
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<tr>
<td>Grant at project end date until 90 days</td>
<td><strong>Rejections for:</strong></td>
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<tr>
<td></td>
<td>All PO Functions</td>
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<tr>
<td></td>
<td><strong>Warnings for:</strong></td>
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<tr>
<td></td>
<td>All AP Functions</td>
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<tr>
<td>Grant is past end date (plus 91)</td>
<td><strong>Rejections for:</strong></td>
</tr>
<tr>
<td></td>
<td>All PO &amp; AP Functions</td>
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</table>
Screenshots: Warning/Rejection Messages

Warning — The status is Grant will end within 30 days for project 101231. (9000,420)
Please plan accordingly. Contact your Department Administrator with any questions.

*Message is shared with Real Estate*
Highlights From Testing

Overall Testing Results

- Functionality works as designed

System Tests: Warning Messages 30 days prior to project end (All on-line PS transactions)

Rejection Messages at project end date for Reqs & POs

Rejection Message at 91 days past project end date for AP and Expenses Transactions

- eBuy reqs cannot be entered if past project end date
- PO cannot be dispatched if past project end date
- Workflow Requisition Approval
  - Not subject to Project control messages
- eBuy reqs cannot be sourced to PO if past project end date
- T&E cannot be enter on-line if 91 days past project end date
- Paper requisitions cannot be entered into AP if 91 days past project end date
- Some EDI transaction will go to Recycled Status (No front end)
- Billing and AR transactions are allowed
- Month End processing is allowed
- Mismatches & Updates cannot be fixed without override
Feedback From Pilot Groups

- Four Departments involved in Pilot Testing
  - Two from MGH, Two from BWH
- Data Cleanup: Reviewing Funds Past End date and about to End
  - Worked with Research Finance to close funds
  - Worked with Post Award to extend end dates
  - Pilots found this to be a hurdle in the beginning but proved to be necessary and helpful
- E-Check Prerequisite
  - Necessary to have online transactions otherwise paper would not be checked and possibly misdirected
  - Must be fulfilled by each department before Project Controls rollout
Feedback From Pilot Groups

- **Warning Messages**
  - Messages are based on line-level transactions due to researchers splitting spending on multiple grants, therefore, one requisition or expense request may generate multiple warning messages.
  - Clicking “ok” based on number of lines on expense request or requisition can be an aggravating process, however most Department Administrators in the Pilot accept this and believe it is worth their time knowing that a grant is coming to an end in order to make a pro-active switch in funds.
  - Based on the Pilot groups suggestions, an update is being made to the warning message to inform users of the possibility of clicking multiple times.
  - Messages are great triggers for lab users to come to Dept Administrators and makes fund clean up easier and then to contact Research Finance to start the closeout process.
Next Steps

- Rollout of Project Controls is dependant on E-Check Rollout in order to avoid paper based AP transactions February-March 2011.
- Anticipated Project Controls rollout for McLean: **April 6th, 2011**

How can you help?

- Check project end dates and report any discrepancies to Mike Roberts
  - Data clean up (Dates on Research Sundry funds, clinical trials, one year projects, transactions…)
- Communicate with technicians entering PeopleSoft orders (E-Buy, eCheck, Expenses) to ensure awareness of Project Controls and go-live date of April 6th...
Hiring in the Aftermath of an OFCCP* Audit

overview for hiring managers

*Office of Federal Contract Compliance Programs
History

• Equal employment opportunity (EEO) laws prohibit job discrimination in the workplace.
• The Equal Employment Opportunity Commission (EEOC) is the federal agency responsible for enforcing federal laws prohibiting employment discrimination on the basis of:
  • Race
  • Color
  • Religion
  • Gender (including pregnancy)
  • National origin
  • Age (40 or older)
  • Disability
  • Genetic information
  • Etc.
• All of these laws apply to current employees as well as employment selection practices.
History

• The Office of Federal Contract Compliance Programs (OFCCP) reviews employers doing business with the federal government for compliance with Affirmative Action/Equal Employment laws & regulations.

• Annually, McLean files an Affirmative Action Plan (AAP) and reports data for each of our jobs, comparing our workforce diversity to community diversity.

• Under the current administration, the agency has increased efforts to ensure compliance.

• Why does McLean have to comply?

  McLean Hospital is a Federal Government contractor!

1. Source: Society for Human Resource Management (SHRM); 10/22/2010
OFCCP EXPECTATIONS

• Accurate reporting
• Analysis of data and development of an action plan to address under represented groups
• Demonstration of implementation of action plan
• Employer must be able to support report data:
  – By producing each employment application if requested
  – By documenting criteria used to make interview/hire/fire/promotion decisions
  – By producing documentation that criteria was applied fairly and consistently
Considerations for Recruiting

There can be no **Disparate Treatment** or Impact in:

- Job descriptions, Advertising, Interview process, Hiring
- **Disparate Impact**, as defined under EEO law, is a less favorable effect for one group than for another. Disparate impact results when rules applied to all employees have a different and more inhibiting effect on women and minority groups than on the majority.

We receive 6,000+ expressions of interest in employment at McLean Hospital every quarter!
2009 OFCCP AUDIT

• McLean Hospital began a compliance review by the OFCCP in December 2009.
• Data was submitted for review (information on applicants and employees: who was interviewed, who was hired, promoted, terminated, etc.)
• The OFCCP requested additional information on candidates who applied for 4 specific job codes in Research and Patient Care.
2009 OFCCP AUDIT

• The information auditors sought included:
  – PROOF we hired the most qualified candidate for each job. Auditors wanted us to review 12,000 applicants and provide information about their years of experience (direct and general), assuming this was used as hiring criteria
  – Did we review and route resumes consistently (“first in, first reviewed”)?
  – If two candidates had similar qualifications, did we interview them both?
  – Does it appear that we are selecting candidates based on criteria other than their qualifications for the job?
2009 OFCCP AUDIT

• The audit was closed in September 2010.
• McLean was given a “Notice of Violation” for recordkeeping.
• In our “Conciliation Agreement” we agreed to correct our recordkeeping deficiencies AND report on a bi-annual basis.
• Agreement included a statement: “McLean commits that these violations will not recur.”
Audit Anecdotes

• What has happened at other institutions:
  – **Managers** are questioned *individually* about every applicant for a job opening and are required to provide a reason for hiring/not hiring or interviewing/not interviewing.

• From the Department of Labor’s own website: Depending on the circumstances, violations also may result in cancellation, suspension, fines or termination of [federal] contracts, withholding of progress payments, and debarment

**DID WE PROVIDE AN EQUAL OPPORTUNITY TO EVERYONE AND IS THERE EVIDENCE OF DISCRIMINATION?**
The Rules apply for all Employment Actions

• The basis for determining affirmative action targets is census data. We utilize this data to compare the makeup of our employee population to the makeup of the general population.

• As we fill open positions and work with our current staff, are we making a dedicated effort to recruit and retain a diverse workforce?

• Documentation in the employment process (from hiring to firing) is critical.

• HR has implemented hiring processes to ensure that we are in full compliance with OFCCP regulations….
Posting Positions

• Submit an online requisition through PeopleSoft
• Provide recruiter with updated job descriptions including:
  – Education
  – Licensure
  – Experience as appropriate
• HR Reviews and Approves before posting
• Minimum posting for 5 days
Reviewing Candidates

• Recruiter routes *qualified* candidates

• Hiring manager reviews each candidate

• Hiring manager must return comments on all candidates routed

• Position may be reposted after 5 days if all applicants have been considered and comments have been forward to recruiter
Interview Candidates

• Contact the candidates directly or ask the recruiter to set up an interview
  – HR interviews provide information regarding benefits, salary range and employment requirements

• Information to track:
  – Candidate’s name
  – Interview date
  – Individual(s) who interview the candidate
  – Type of interview (phone/in person)
  – Interview notes from each interviewer (should be job related)

• **DO NOT** send candidate to HR for CORI at this time!
Preparing for Offer

• Recruiter checks references for candidate
  – Department may check references, but please obtain official reference form from HR
• Letter of recommendation (if provided)
  – Recruiter or hiring manager must confirm with the individual who wrote the reference
• Recruiter completes salary calculation and reviews with hiring manager
Making Job Offer (HR)

• Recruiter extends the offer, but candidate may NOT start until:
  – Successful CORI check
  – Successful National Background check
  – Candidate receives medical clearance

• Recruiter sends conditional offer letter and email with directions for completing hiring requirements (background check, Occupational Health)
Completing Hiring Requirements

- Candidate completes CORI form *in person* in HR office, Hire Right national background check form online, and Occupational Health requirements.
- Once all have cleared, coordination occurs for start and orientation date.
- Hiring Manager sends recruiter information regarding each candidate interviewed including:
  - Name
  - Date of interview
  - Persons who interviewed the candidate
  - Type of interview (phone/1st interview/2nd interview)
  - Comments regarding why candidate was not chosen
Employee’s First Day

- New employee visits HR to complete final paperwork
- New employee attends orientation
- New employee receives and ID badge form in HR
- New employee reports to Security for completion of ID badge
REMEmBER

• Under no circumstances may an employee start before:
  – Reference checks have been completed
  – CORI and National Background Checks are complete
  – Medical clearance has been obtained

• If you have any questions, please check with your recruiter
- McLean Research Vision Committee 1/14/2011 √
- President’s Cabinet - Preview 1/27/2011 √
- Presentation to Peter Markell, VP, CFO, Partners 2/1/2011 √
- President’s Cabinet – Update 2/3/2011 √
- McLean Research Committee 3/2/2011 √
- DRAW 3/15/2011
  - Research Town Meeting 4/25/2011
  - McLean News 6/30/2011
Proposed Refinement: Grant Administrator model and funding

1. Grant Administrator - I
   a) Proficiency in basic grants management (pre-award; post-award; research finance; effort reporting; transactional tools; hospital cost principles; NIH grant policies)
   b) Assigned to specific PI(s) / lab(s)
   c) Salary covered by extramural funding (up to 95%)

2. Grant Administrator - II
   a) Proficiency in basic grants management proficiency PLUS management of complex grants and agreements (e.g. cooperative agreements, center grants, training grants, program projects)
   b) Assigned to specific PI(s) / lab(s)
   c) Salary covered by extramural funding (up to 95%)
Proposed Refinement: Grant Administrator model & funding

3. Grant Administrator - III
   a) GA-I and GA-II proficiency PLUS portfolio analysis, quality assurance and supervision of divisional GA-Is and GA-IIIs

   b) Assigned to specific division(s)
      i. Provides standard grant support for division chief(s) and PIs as needed
      ii. Oversees GA-Is and GA-IIIs within division(s)

   c) Salary
      i. Extramural funding – covers time/effort associated with hands-on post-award grant administration for division chief(s)’ and PIs’ research
      ii. Divisional sundry funds and other institutional support – covers time/effort associated with GA supervision, division-wide portfolio analysis and quality assurance

Notes
• A sponsored research fund can only be charged for the salary of one GA
• GA-I and GA-II salaries cannot be charged to a grant that includes GA-III salary
GA Reporting Relationships

Sr Vice President, RA

Assoc Director, RA

Division Chief

GA-III

PIs / Labs

GA-I

GA-II

PIs / Labs

GA-III will have dual reporting relationship – to division chief and to Associate Director of Research Administration.
### Proposed Refinement: Timing of GA Training via HealthStream

<table>
<thead>
<tr>
<th>Modules</th>
<th>Curriculum Development - Policies</th>
<th>Review of content by PHS RM &amp; Compliance</th>
<th>Finalization of training content</th>
<th>Availability via HealthStream</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-3</td>
<td>April 2011</td>
<td>May 2011</td>
<td>June 2011</td>
<td>July 2011</td>
</tr>
<tr>
<td>4-6</td>
<td>July 2011</td>
<td>August 2011</td>
<td>September 2011</td>
<td>October 2011</td>
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<tr>
<td>7-9</td>
<td>October 2011</td>
<td>November 2011</td>
<td>December 2011</td>
<td>January 2012</td>
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</tbody>
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Note: timeline for development of case-based transactional curriculum and associated assessment will be finalized in conjunction with PHS RM Training (*A Chase, R Cyr*)
PROJECT PLAN

Phase I (FY11-FY13)

- Re-allocation of roles and responsibilities between PHS RM/RF and McL RA
  - Industry-sponsored Clinical Research
  - Subcontracts
  - Post-Award Roles and Responsibilities

- Grant Administrator Competency
  - Standardization of job descriptions
  - Policies and Transactions: Training and Assessment

- InfoEd PD roll-out at McLean

Beyond Phase I

- PI Education (collaboration between McL Chief Academic Officer & Research Administration)
  - New PIs
    - Basic grants management training (PHS PI Toolkit; policies, budgeting, staff supervision)
    - Mentoring
    - Established PIs: refreshers and updates about policies and compliance issues

- Strong GA administrative core
  - Efficiently matching PI workload to appropriate amount of GA support
  - Effective and compliant

- Additional e-Tools: eIRB, eIACUC
Research Administration Project Management

- **McLean Steering Committee**
  - Responsibilities – meet every other week (or more if necessary) to:
    - Assign tasks and initiatives
    - Monitor plan implementation / progress
    - Identify obstacles and potential problems; develop plans to appropriately respond
    - Ensure appropriate resources and prioritization
    - Provide updates to S. Rauch and P. Markell
  
  - Members
    - Peter Paskevich, Chair (Sr VP for Research Administration)
    - Raquel Espinosa (Associate Director, Research Administration)
    - David Lagasse (CFO)
    - Natalie Herron (Compliance Officer)
    - Catharyn Gildesgame (Director, Strategic Implementation)
  
  - Administrative Support
    - Kim Paulk (Administrative Manager)
We are delighted to announce the selected members as part of the RAAC:

Administrators
Jennifer Clark
Dawn Morrissey
Valerie Robbins

Principal Investigators
Sabina Berretta
Marc Copersino
Brent Forester
Nancy Mello
Marisa Silveri

Response received from Principal Investigators and Administrators was overwhelming.
• Highlights the need to integrate and communicate McL Research Administration’s many new initiatives with the research community.

Purpose: Advise McL Research Administration
• on how we can better communicate important information
• on the need for training or re-training as systems and requirements evolve.

One year appointment
• anticipate adding new members as others rotate off
• invited guests to each committee meeting (to ensure adequate representation)

List kept of everyone who volunteered, for participation at a future date.
Meet once every quarter (meetings to be set up soon)