Report on the Status and Recommendation to the Distribution of Grant Indirect Cost Recovery Funds at Southern Illinois University Carbondale

Completed by The Chancellor's Indirect Cost Recovery Task Force

May 10, 2022

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SIUC Indirect Cost Recovery Task Force – Report and Recommendations

Executive Summary:

The SIUC Indirect Cost Recovery Task Force (ICRTF), consisting of faculty and staff representatives from relevant units across campus, was constituted at the request of Chancellor Austin Lane and given the charge to: 1) review the current model used for distribution of Indirect Cost Recovery (ICR) funds, 2) evaluate this model with respect to compliance with federal requirements, and 3) make a recommendation for a revised ICR distribution model which aligns with and supports the Research and Innovation Pillar of the Imagine 2030 institutional Strategic Plan. In execution of this charge, members of the task force reviewed models used at a variety of R1 and R2 institutions (see Appendix A), and discussed benefits, drawbacks, and likely overall impacts of different aspects of these models if implemented at SIUC. The task force arrived at the following recommended ICR distribution model.

Proposed / Future Annual Indirect Revenue Distribution Model

Units-1	Proposed Allocation %	Current Allocation %
Vice Chancellor of Research & Graduate School Dean	44.00%	30.6%
Deans/Colleges	24.00%	23%
Chancellor	15.00%	23%
Office of Sponsored Projects Administration	6.00%	0
Faculty	4.00%	0
Research Facility Support	7.00%	0
FB Cost Recovery Acct.	0%	15%
IT	0%	*5%
Library	0%	*3.4%
Total Allocation	100%	100%

^{*}The IT and Library allocations will become a part of the Chancellor's allocation. Both IT and the Library should continue to receive 5% and 3.4% of the Annual Indirect Revenue, respectively.

Within this model there are specific provisions for:

- 1) Explicit funding support for Undergraduate Research,
- 2) ICR return to faculty to incentivize expanded research efforts,
- 3) Funding for equipment purchase/upkeep in the Research Support Facilities
- 4) Investment in centralized research infrastructure to support the research enterprise, funding for staff training, grant writing workshops, and operational costs in the Office of Sponsored Projects Administration
- 5) Chancellor's allocation is designated to cover IT and Library distribution.

The ICRTF committee recommends that this new model take effect on July 1, 2022.

Introduction:

The inception of the Indirect Cost Recovery Task Force (ICRTF) occurred during one of the Chancellor's College Listening sessions. At that event it was agreed that a committee of faculty and staff should review the current ICR distribution model with a goal to make a recommendation which would **align this distribution to support the Research & Innovation Pillar of the "Imagine 2030" University Strategic Plan.** The Chair of the Graduate Council was tasked with the responsibility for assembling the committee and developing a report / recommendation.

The Graduate Council Chair, with input from the Vice-Chancellor for Research, developed a suggested ICRTF committee roster, with a number of alternates, which was reviewed by the members of the Graduate Council. Goals for the committee membership were: 1) representation from administrators and faculty actively engaged with research, and 2) representation from each college and research related constituency group. The Graduate Council reviewed the suggested roster and requested changes to reflect better sex/gender representation. The changes were incorporated, as requested, and the final committee roster was reviewed and approved by the Graduate Council Executive Committee.

The ICRTF committee members are as follows:

Name	Representing
Gary Kinsel	OVCR
Philip Chu	Graduate Council
Ken Anderson	Center Directors
Patrick Amihere	OSPA
Wil Clark	IT
John Pollitz	Library
Boyd Goodson	Chemical & Biomolecular Science
Diana Sarko	School of Medicine
Jia Liu	Civil Engineering
Justin McDaniel	Public Health
Senetta Bancroft	School of Education
Alison Watts	Analytics, Finance, Economics
Craig Anz	Architecture
Jennifer Brobst	Law
Karen Jones	Agricultural Science
Thomas Shaw	Graduate Council

Early in the process the initial committee of the 16 individuals listed recognized that expertise in the institution's accounting processes was needed and it was agreed to ask Mr. Charlie Cox to participate. This final committee of 17 individuals met approximately biweekly throughout the spring 2022 semester to develop the report and recommendations.

Chancellor Austen Lane presided over the first meeting of the ICRTF on January 4, 2022 to provide the charge to the Committee. The Chancellor instructed the ICRTF to 1) evaluate the current grant overhead distribution as to sustainability and audit survivability, 2) investigate options for alternate grant overhead distribution, and 3) provide a recommendation for a new ICR distribution model that would support the Research & Innovation pillar of the Strategic Plan. During this time the Chancellor challenged the Committee to "think outside of the box", "be creative", and "be bold" in the committee recommendation. After the Chancellor's remarks, the Committee discussed a process for meeting the charge. It was decided to gather information on ICR distribution practices at other institutions and on compliance requirements regarding expenditures of ICR funds.

The ICRTF Committee's was guided by the "Research and Innovation" pillar of the University's recently released "IMAGINE 2030" strategic plan and devised this recommendation to help the university achieve the specific goals outline in that plan; namely:

- 1. ...to become an R1 Research Institution;
- 2. ...to establish several areas of research excellence that will gain national and international recognition;
- 3. ... to invest in centralized infrastructure needed to support the overall "research" enterprise;
- 4. ...to allow SIU to establish a vision and strategy in research; and
- 5. ...to establish a spirit of collaboration in research and innovation across the system.

Federal Regulations Related to ICR Expenditures:

The definition of indirect cost and "what counts" is integrally tied to how direct costs are defined:

2 C.F.R. § 200.413 (effective 11/12/2020) defines Direct Costs as follows:

(a) General. Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect (F&A) costs.

Additional guidance is found in the federal OMB Circular A-21, interpreting Title 2 of the CFR and restrictions on use of indirect cost recovery to ensure proper use and allocation that is research-focused:

• "In developing the departmental administration cost pool, special care should be exercised to ensure that costs incurred for the same purpose in like circumstances are treated consistently as either direct or F&A costs. For example, salaries of technical staff, laboratory supplies (e.g., chemicals), telephone toll charges, animals, animal care costs, computer costs, travel costs, and specialized shop costs shall be treated as direct cost wherever identifiable to a particular cost objective. Direct charging of these costs may be accomplished through specific identification of individual costs to benefiting cost objectives, or through recharge centers or specialized service facilities, as appropriate under the circumstances."

- "Interest. a. Costs incurred for interest on borrowed capital, temporary use of endowment funds, or the use of the institution's own funds, however represented, are unallowable. However, interest on debt incurred after July 1, 1982 to acquire buildings, major reconstruction and remodeling, or the acquisition or fabrication of capital equipment costing \$10,000 or more, is allowable."
- "Institutions are also subject to the following conditions: (1) Interest on debt incurred to finance or refinance assets re-acquired after the applicable effective dates stipulated above is unallowable. (2) Interest attributable to fully depreciated assets is unallowable."

Current ICR Distribution Model:

SIUC Model: The current ICR distribution framework at SIUC is shown in the following table. A 15% deduction is taken "off the top" and applied to the deficit incurred in the Fringe Benefits cost-recovery account. Additionally, 5% is taken off the top and transferred to IT and 3.4% is taken off-the-top and transferred to the Library. The remaining 76.6% is divided with 30% going to the Chancellor, 30% going to the Dean of the College in which the funded faculty PI (or PI's) is located, and 40% going to the OVCR. The table below summarizes this information and also shows the actual dollar distribution if an ICR income of \$3.5M is assumed (this ICR income is approximately what has been received for the last several years).

Off the top		Adj ICR	For \$3.5M of ICR
15%	FB Cost Recovery Acct.	15%	\$525,000
5%	IT	5%	\$175,000
3.4%	Library	3.4%	\$119,000
Remaining 76.6%			
30%	Chancellor	23%	\$805,000
$30\%^{1,2}$	College	23%	\$805,000
40%	OVCR	30.6%	\$1,071,000

¹In multi-PI grants the college allocation is divided between colleges (or Centers) based on % PI contribution. ²The distribution of the funds after being received by the college varies from college to college.

The ICRTF took the further step of examining the last 3 years of ICR fund expenditures by the Chancellor (including the allocation to FEM), the OVCR, IT and the Library using Golden accounting records provided by the units named. This review led to concerns being expressed by the committee that some of the expenditures could not be easily justified as being in support of the research enterprise of the institution.

Models at Other Institutions: The ICRTF also spent some time reviewing ICR distribution models used at other institutions. While this information is not always easily accessed, ICR distribution models for a group of institutions with similar and higher NSF HERD rankings were discovered through searches of the institutional websites. The detailed information and links to source material are provided in Appendix A. Four points are worth noting from this analysis.

First, the ICR returned to the OVCR / OSPA at the 9 comparison institutions ranges from a high of 70% to a low of 20% and the ICRTF suggested 50% return to this unit falls well within this range. Second, the ICR returned to the Colleges / Departments ranges from a high of 44% to a low of 13% and the ICRTF suggested 24% return to this unit also falls well within this range. Third, return of ICR to individual PI's is very common with 7 of the 9 comparison institutions returning 3-5% of ICR to individual PI's; similar to the 4% return in the ICRTF suggested model. Fourth, for those institutions which return ICR specifically for support of Research Facilities, the average returned is 8%; comparable to the ICRTF suggested 7% return.

Proposed ICR Distribution Model

There is a twofold rationale for the proposed changes to the ICR distribution model at SIUC. First, as noted above, there is concern that the current distribution model allows ICR funds to be used for purposes other than those consistent with federal regulatory requirements. Second, the ICRTF wishes to more closely align the usage of the ICR funds with the goals of the IMAGINE 2030 SIUC Strategic Plan, and especially with the goals of the Research & Innovation Pillar. To that end, the ICRTF suggests that the following distribution model be adopted beginning FY23. (Note: A more detailed breakdown of the proposed model and alignment with the goals of the IMAGINE 2030 SIUC Strategic Plan is shown in Appendix B.)

Proposed / Future Annual Indirect Revenue Distribution Mode		
Units-1	Allocation %	*Allocation \$
Vice Chancellor For Research & Graduate Student Dean	44.00%	\$1,540,000
Deans/Colleges	24.00%	\$840,000
Chancellor	15.00%	\$525,000
Office of Sponsored Projects Administration	6.00%	\$210,000
Faculty/PI's	4.00%	\$140,000
Research Facility Support	7.00%	\$245,000
Total Allocation	100%	\$3,500,000

^{*}Allocation of dollars based on an annual ICR income of \$3.5M

Several elements of the ICR distribution model warrant further discussion. Specifically,

- 1. An allocation of 44% of ICR funds to be returned to the OVCR is recommended. In addition to providing support for the normal operations of the OVCR several new activities will be supported by this allocation. Specifically:
 - a) An allocation of the funds (~\$250,000) will be used to support the re-establishment of the Undergraduate Assistantship (UGA) program. This program, which was discontinued ca. 7 years ago with the elimination of the Center for Undergraduate Research and Creative Activity (CURCA), is extremely popular with the faculty and allows faculty mentors to identify research and creative activity projects suitable for engagement of UG students. The UGA program provides ca. 10 hours per week of wages for the UG student during the AY as an incentive to encourage student participation. This allocation is expected to increase the number of UG's involved in research and creative activity substantially and serve as a draw for increasing enrollment through increased research opportunities and support.

- b) An allocation of the funds (~\$150,000) will be used to establish competitive Research and Creative Activity SEED grants. This level of funding will be used to support five to ten \$15,000 to \$30,000 SEED grants per year. These types of awards, which are offered at many universities, can be used by faculty to pursue novel research and/or creative activity concepts with a specific goal of developing baseline results suitable for support of an eventual application for major funding from external agencies. This allocation is expected to increase the number of funded external awards to faculty, ultimately bolstering indirect cost gains to SIUC, and support moving SIUC towards R1 status.
- c) An allocation of the funds (~\$50,000) will be used to support faculty travel, e.g., to professional conferences for presentation of their research or creative activity results or to meet with Program Officers at various funding agencies. This travel will allow SIUC faculty to become better recognized on a national and international level with respect to the research and creative activity being performed on campus. This allocation is expected to increase the visibility of SIUC and positively move it in the direction of achieving R1 status.
- 2. An allocation of 24% of ICR funds to be returned to the Deans / Colleges is recommended. This allocation is consistent with the amount of ICR currently being returned to the Colleges (23%) and will allow the Deans to continue to support the research operations underway in their individual units.
- 3. An allocation of 15% of ICR funds to be returned to the Chancellor is recommended. While the Chancellor will continue to have discretion to use these funds to support the university research enterprise, this allocation to the Chancellor will be used to cover the activities of the SIU Library (3.4%) and IT (5%) currently supported through a direct off-the-top ICR allocation.
- 4. An allocation 6% of ICR funds to be returned to the Office of Sponsored Projects Administration is recommended. These funds will be used to support the operations of OSPA and allow this unit to serve the research faculty more effectively. Specific items targeted for funding include: 1) investment and maintenance of SIUC's centralized electronic research grants management systems to ensure accurate and auditable financial information processes, 2) regular professional training of staff within OSPA, 3) annual subscriptions to funding opportunity notification software (e.g., Pivot RP), 4) support of grant-writing workshops, whether internally staffed or provided by external sources, 5) purchase of annual subscriptions to pre-award and post-award software needed for efficient operation of the office, and 6) student worker and GA support.
- 5. An allocation of 4% of ICR funds to be returned to faculty PI's on funded sponsored projects is recommended. These funds will be placed in a local account under the control of the PI and will be available for the PI to use in support of their research efforts. **These funds will serve as an incentive to faculty to increase their funding efforts and apply for more awards with full ICR rates applied**. Further, the availability of the unrestricted funds will allow the faculty to: 1) build professional relationships through conference participation, 2) support undergraduate research participation, 3) maintain or update critical individual laboratory research equipment and software, and 4) explore innovative research ideas.
- 6. An allocation of 7% of ICR funds to support the research infrastructure is recommended. These funds will be placed in a local account and used specifically to support the major

research equipment located in the university research support facilities (the SIU Mass Spectrometry Facility, the SIU NMR Facility, the SIU IMAGE Facility, the BioLaunch Core Facilities, etc.). Funds will be used for: 1) the purchase of instrument maintenance contracts, 2) instrument operational costs, and 3) periodic repair and replacement of major shared equipment used by the research faculty at SIUC, all with the overarching goal of maximizing multi-user impact and strengthening grant applications — ultimately increasing indirect cost returns — through support of infrastructure that is critical to Facilities & Equipment components of grant submissions.

Other Considerations:

Fringe Benefit Deficit Reduction: The ICRTF recognizes that the Fringe Benefit cost recovery account is currently approximately \$2M in the red. The committee further recognizes that the 15% of ICR being taken off-the-top was being used to reduce this account deficit and that this deficit will be eliminated in approximately 4 years at the current rate of pay. The ICRTF proposes that this deficit be eliminated in one of two ways. Option 1: The Chancellor identifies internal funds (e.g., from the 5% state appropriation increase in FY22) that can be used to eliminate all, or part, of the deficit. Option 2: 15% of the ICR return continues to be taken on an annual basis from all allocations and applied to the Fringe Benefit deficit until such time that the deficit is eliminated (approximately 4 years). If this latter approach is taken the dollars returned to the individual units would each be reduced by 15% for approximately the next 4 years leading to a distribution as shown in the following table:

Proposed / Future Annual Indirect Revenue Distribution Mod	el		15% Payment	4 - Year
Units-1	Allocation %	Allocation \$	on FB Deficit	Allocation
Vice Chancellor For Research & Graduate Student Dean	44.00%	\$1,540,000	\$231,500	\$1,308,500
Deans/Colleges	24.00%	\$840,000	\$126,000	\$714,000
Chancellor	15.00%	\$525,000	\$78,750	\$446,250
Office of Sponsored Projects Administration	6.00%	\$210,000	\$31,500	\$178,500
Faculty	4.00%	\$140,000	\$21,000	\$119,000
Research Facility Support	7.00%	\$245,000	\$36,750	\$208,250
Total Allocation	100%	\$3,500,000	\$525,000	\$2,975,000

Note: Elimination of the Fringe Benefit cost recovery account deficit is expected to take approximately 4 years at the current level of annual ICR return but could be eliminated sooner if the annual ICR return were to increase or additional funds could be contributed from elsewhere.

Annual Review of Indirect Expenditures: The ICRTF and the current Interim VCR strongly advocate for the institution of an Annual Review of Indirect Expenditures by a standing faculty committee (e.g., the Graduate Council Research Sub-Committee). The purpose of this annual review, to be presented by the current Vice Chancellor for Research, would be two-fold: 1) to provide full transparency to the faculty who generate the ICR return to ensure that the funds are being appropriately used to support the research enterprise of the institution, and 2) to allow for the possibility of adjustment of the ICR allocation percentages to address unanticipated changes in revenues or expenses. For example, it is clear that the software used by the Office of Sponsored Projects Administration (OSPA) is substantially out of date and

in need of a significant upgrade in order to respond to the growing demands of a fully research active faculty. This type of Electronic Research Administration (ERA) software is a critical investment if the institution is to move in the direction to become an R1 research university. Such ERA software will allow for more efficient grant processing, better monitoring of project budgets and compliance related issues, and timely reporting to funding agencies. However, the ultimate cost burden for such ERA software is not known at the present time and may require a reallocation of ICR funds to appropriately fund this investment. Regardless, such a reallocation of ICR funds should only be undertaken with a transparent opportunity for input by the university faculty and administration.

Appendix A:

HERD	Carnegie		OVCR +	College			Provost /	Graduate	Research	General
Rank	Type	Institution	OSPA	+ Dept	PI	Library	President	School	Facilities	Fund
99	R1	Wayne State University	24%	13%	5%				9%	49%
155	R2	University of Alabama - Huntsville	23.3%	15.2%	4%		10.6%			47%
161	R1	University of Nevada Las Vegas	48%	40%		4%	8%			
204	R2	Portland State University	49.7%	26%	2%				1.5%	20.8%
205	R2/R1	Kent State	63%	32%	5%					
217	R2	Missouri Science & Technology	70%	20%		2%			8%	
218	R2	Southern IL University Carbondale	50%	24%	4%		15%		7%	
245	R2	Illinois State University	32.2%	44%	3%	3%	9.7%	8.1%		
251	R2	Northern Illinois University	40%	20%	5%				15%	20%
268	R2	Miami University of Ohio	20%	35%	5%					40%

https://research.wayne.edu/spa/news/indirect-cost-recovery-allocation-formula-31430

https://www.uah.edu/images/administrative/finance/budget/BudgetCommittee03-27-2012.pdf

https://www.unlv.edu/sites/default/files/page_files/2861/Medicine-Compliance-IndirectCostDistributionRatesPolicy.pdf

 $\underline{https://www.pdx.edu/research/sites/g/files/znldhr761/files/2021-10/Introduction\%20to\%20F\%26A.pdf}$

https://www.kent.edu/budget/rcm-manual

 $\underline{https://chancellor.mst.edu/media/administrative/chancellor/documents/policy/070119ResearchIndirectRecovery.pdf}$

Proposed ICR Allocation

https://policy.illinoisstate.edu/fiscal/7-6-3.shtml

 $\underline{https://www.niu.edu/policies/policy-documents/indirect-cost-distribution.shtml}$

https://www.miamioh.edu/research/policies/indirect-recovery-distribution/

Appendix B

rippendix b								
	Metrics to measure success	VCR	DEANS/COLLEGES	CHANCELLOR	OSPA	FACULTY	RESEARCH FACILITY SUPPORT	TOTAL
~Annual Indirect Revenue Distriution Percentage	\$3,500,000	44%	24%	15%	6%	4%	7%	100%
Distribution Amount	\$3,500,000	\$1,540,000.00	\$840,000.00	\$525,000.00	\$210,000.00	\$140,000.00	\$245,000.00	\$3,500,000.00
Fringe Benefit Cost Recover Debt (\$2,975,00.00)	\$2,975,000	44%	24%	15%	6%	4%	7%	100%
FBCRD RESONSIBILITY	\$525,000	\$231,000.00	\$126,000.00	\$78,750.00	\$31,500.00	\$21,000.00	\$36,750.00	\$525,000
ACTIVE SUPPORT OF RESEARCH	\$2,975,000	\$1,309,000.00	\$714,000.00	\$446,250.00	\$178,500.00	\$119,000.00	\$208,250.00	\$2,975,000
Strategic Goals								
	Increase research expenditures of each faculty member	Increase research expenditures of each faculty member	Increase research expenditures of each faculty member	LIBRARY SUPPORT	Increase number of grant proposals that are submitted	expenditures of each faculty member		
	Increase number of grant proposals that are submitted	Increase number of grant proposals that are submitted	Increase number of grant proposals that are submitted	IT SUPPORT		Increase number of grant proposals that are submitted		
Become an R1 Research Institution	Increase the number of graduate assistantships	Increase the number of graduate assistantships	Increase the number of graduate assistantships			Increase the number of graduate assistantships		
	Increase the enrollment of doctoral level students	Increase the enrollment of doctoral level students	Increase the enrollment of doctoral level students			Increase the enrollment of doctoral level students		
	Increase the number of research faculty	Increase the number of research faculty	Increase the number of research faculty					
	Increase number of grant proposals that are	Increase number of grant	Increase number of grant proposals that are		Increase number of grant proposals	Increase number of grant		
Establish several areas of	submitted	proposals that are submitted	submitted		that are submitted	proposals that are submitted		
research excellence that will		Increase the enrollment of	Increase the enrollment of doctoral level					
gain national and international	Increase the enrollment of doctoral level students	doctoral level students	students					
recognition		Increase the enrollment of	Increase the enrollment of doctoral level					
	Increase the enrollment of doctoral level students	doctoral level students	students					
Invest in centralized		Streamline research proposal &			Streamline research proposal &			
	Streamline research proposal & accounting processes	accounting processes			accounting processes			
support the overall "research"								
enterprise SIU will establish a vision and	Modify GC-Research subcomitte to provide guidance	Madify CC Desease subsemitte to	CHI will a stabilish a stable a sed starter to	SIU will establish a vision and	Culturally and blish and day and about an	SIU will establish a vision and	COLUMN - stabilish a statement and street and	
strategy in research	to VCR direct resources to areas critical to the	provide guidance to VCR direct	SIU will establish a vision and strategy in research	strategy in research	SIU will establish a vision and strategy in research	strategy in research	SIU will establish a vision and strategy in research	
strategy in research	to ver direct resources to areas critical to the	provide guidance to VCR direct	research	Strategy in research	III research	Strategy in research	III research	
Establish a spirit of		Establish a spirit of collaboration	Establish a spirit of collaboration of research	Establish a spirit of	Establish a spirit of collaboration of	Establish a spirit of	Establish a spirit of collaboration of	
collaboration of research and		of research and innovation across	and innovation across the system	collaboration of research and		collaboration of research and	research and innovation across the	
innovation across the system		the system		innovation across the system	system	innovation across the system	system	
Notes	IDCR fund distribution is to be tied to the areas identified							
	The VCR Allocation would include a line item							
	commitment of \$250,000 for UGA's administered							
	through the OVCR							
	The 7% Research Facility Support would be used for							
	instrument maintenance contracts, repair and							
	replacement. Funds would also be available for cost- share on instrumentation grants							
	Fringe Benefit Cost Recovery Debt resonsibility would							
	Fringe Benefit Cost Recovery Debt resonsibility would end once debt of \$2,975,000 has been paid and							