



Report to the Audit and Compliance Committee of the
UHS Board of Regents on:

UHCL RESEARCH GOVERNANCE AND PROCESS
OVERVIEW
AR2023-07

UNIVERSITY of **HOUSTON** SYSTEM

INTERNAL AUDITING DEPARTMENT

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EXECUTIVE SUMMARY

Overview and Scope Summary

The Office of Sponsored Programs (OSP) of the University of Houston-Clear Lake (UHCL) supports a wide range of faculty interests and projects in addition to research; and encourages all scholarly activity at the university that could benefit from external funding. The OSP provides pre-award and post-award support, and grant compliance oversight. The scope for this audit was a review of the current controls and procedures in place that are used to help ensure research related activities are properly managed, monitored and comply with applicable regulations.

Observations

The University of Houston System (UHS) Department of Internal Auditing focused on evaluating the various processes related to managing research related activities. The audit identified the need for the OSP to develop a sponsored research activities policy, develop a data management and sharing policy, and utilize the services of the UHCL Information Security Officer (ISO) in research related activities.

Overall Audit Opinion

The OSP has adequate processes in place for managing research related activities. However, the OSP could improve certain areas of operation, which include the development of a sponsored research activities policy, the development of a data management and sharing policy; and participation of the UHCL ISO in research related activities.

Recommendations

1. The OSP should develop a sponsored research activities policy.
2. The OSP should develop a research data management and sharing policy, including the requirement for a formalized, written data management plan for all university projects.
3. The OSP should involve the UHCL ISO in research related activities, including, but not limited to, training, meetings with researchers, policy reviews and data management plan reviews.

UNIVERSITY OF HOUSTON-CLEAR LAKE RESEARCH GOVERNANCE AND PROCESS OVERVIEW

INTRODUCTION

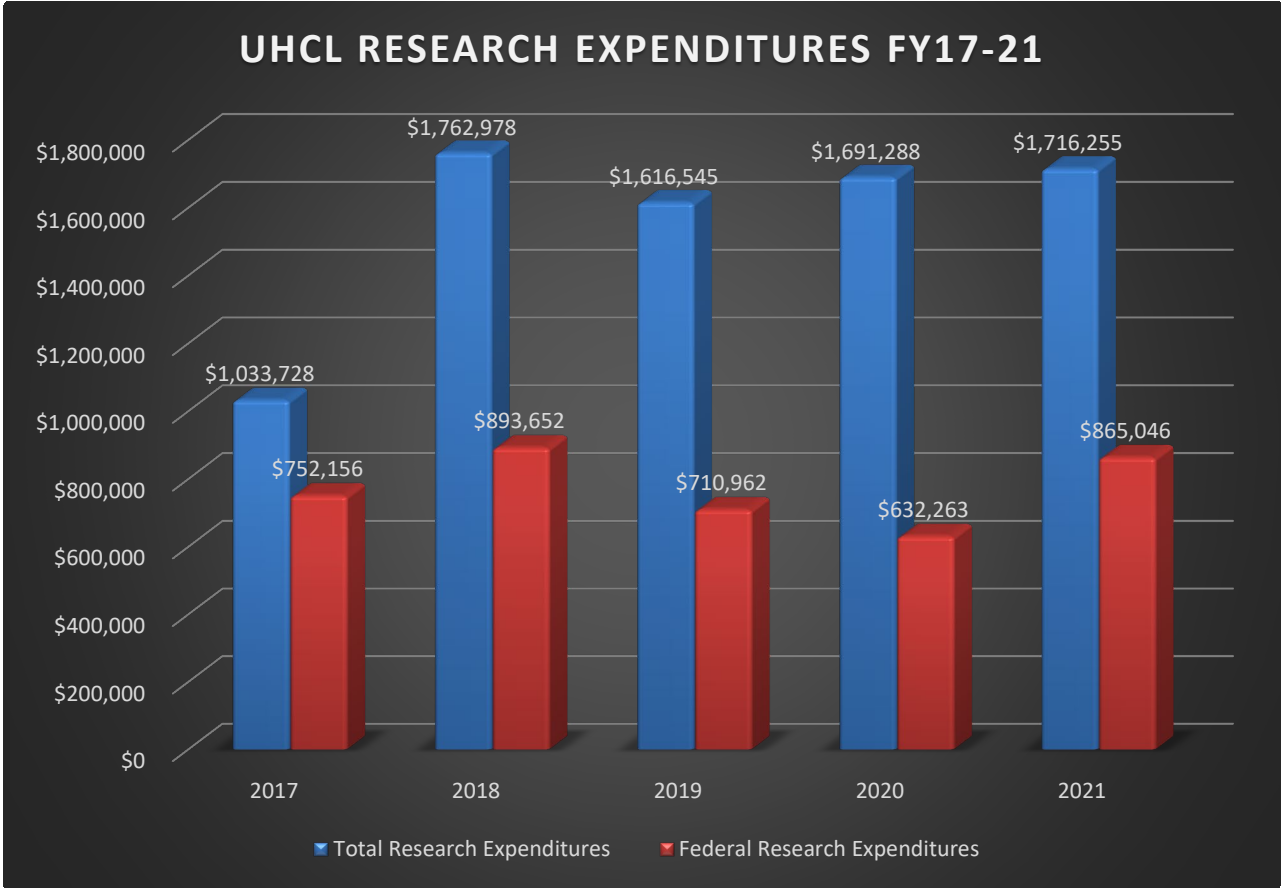
The UHS Department of Internal Auditing developed an annual audit plan based upon a system-wide risk assessment to identify significant areas of risk facing the University of Houston System. All the audits on the audit plan are conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS), and the International Standards for the Professional Practice of Internal Audit, published by the Institute of Internal Auditors (IIA).

BACKGROUND

The Office of Sponsored Programs of the University of Houston-Clear Lake (OSP) serves as the designated office for the submission of proposals to potential sponsors; for the administration of grants, contracts and other agreements awarded to UHCL by these sponsors; and for compliance with applicable federal, state and sponsor regulations. While awards for successful proposals are made to UHCL, the Principal Investigator is responsible for the management, execution, and completion of the project, including submission of all required reports. The OSP provides information, assistance, and support to the Principal Investigator during the administration of the project.

In its' UHS Accountability Reports, UHCL reports total and federal research expenditures (see chart below). These numbers indicate that for each year since 2017, expenditures for federal research has exceeded 30% of total research dollars. In addition, competition and compliance for federal research dollars has increased and become an increasing topic of discussion in the news and among federal legislators.

- Total Research Expenditures – Total research funds from all sources expended during a fiscal year and reported to the National Science Foundation (NSF).
- Federal Research Expenditures – Research funds from federal sources expended during a fiscal year and reported to the NSF.



OBJECTIVE AND SCOPE

The audit objectives were to:

- Determine whether there is adequate oversight in place to ensure research related activities are properly managed and monitored.
- Determine whether there are adequate controls and procedures in place to ensure that research related activities comply with applicable policies, procedures, regulations, statutes, and laws.
- Determine whether standardization is utilized for efficiency among departments and universities.

Information relevant to this audit was obtained through:

- Interviewing research and information security personnel.
- Conducting walkthroughs over key processes.
- Reviewing laws and regulations.
- Reviewing UHS and UHCL policies and procedure

ISSUE 1 – SPONSORED RESEARCH ACTIVITIES POLICY

Objective: To determine whether there are adequate controls and procedures in place to ensure that research related activities comply with applicable policies, procedures, regulations, statutes, and laws.

Criteria: System Administration Memorandum 01.G.01 (Sponsored Research Activity)

Risk: Establishing clear roles and responsibilities and appropriate controls prevents non-compliance with federal, state and sponsor guidelines, regulations, statutes, and laws regarding the administration of sponsored projects.

Observation: UHCL does not have a written sponsored research activities policy that contains guidelines, references, and general procedures for the administration of sponsored projects. Certain roles, responsibilities, and expectations are not clearly defined regarding the administration of sponsored projects.

ISSUE 2 – DATA MANAGEMENT AND SHARING POLICY

Objective: To determine whether there are adequate controls and procedures in place to ensure that research related activities comply with applicable policies, procedures, regulations, statutes, and laws.

Criteria: System Administration Memorandum 07.A.08 (Data Classification and Protection) and System Administration Memorandum 01.D.06 (Protection of Confidential Information).

Risk: Establishing appropriate research data classification and technical and security safeguards protects research data, data integrity, and/or prevents unlawful or unauthorized use of research data as well as fines, loss of funding and reputational risk.

Observation: UHCL OSP does not have a written data management and sharing policy that contains guidelines and procedures to ensure consistency for technical and security safeguards with regards to the proper handling, storage, and dissemination of research data. Roles, responsibilities, and expectations are not clearly defined regarding the management and safeguarding of research data. In addition, a formalized, written data management plan is prepared for university projects only when required by the sponsoring agency.

ISSUE 3 – INFORMATION SECURITY OFFICE INVOLVEMENT

Objective: To determine whether there are adequate controls and procedures in place to ensure that research related activities comply with applicable policies, procedures, regulations, statutes, and laws.

Criteria: System Administration Memorandum 07.A.08 (Data Classification and Protection) and System Administration Memorandum 01.D.06 (Protection of Confidential Information)

Risk: Appropriate classification and protection of information allows for implementation of appropriate technical and physical security safeguards to protect and secure data. This promotes compliance with sponsor data management guidelines as well as mitigates risks of threats and vulnerabilities. Mitigation of risks further reduces the possibility of fines, loss of funding and reputational risk.

Observation: The OSP does not involve the UHCL Information Security Officer (ISO) in discussions related to data for research related activities, including, but not limited to education and awareness training for technical and physical security safeguards, meetings with researchers, and developing research data policy and procedures. In addition, the UHCL ISO is not consulted during the development of data management plans for compliance with sponsor required guidelines.

RECOMMENDATIONS:

1. The OSP should develop a sponsored research activities policy.
2. The OSP should develop a university research data management and sharing policy, including the requirement for a formalized, written data management plan for all university projects.
3. The OSP should involve the UHCL ISO in research related activities, including, but not limited to, training, meetings with researchers and data management plan reviews.

MANAGEMENTS RESPONSE:

UHCL is in the process of hiring a new OSP Executive Director, and the new OSP Executive Director will be responsible for preparing a sponsored research policy. The current UHCL OSP Guidelines will be updated to include sections addressing intellectual property, human subjects, animal care, safeguarding research data, conflict of interests for investigators and export controls.

UHCL is in the process of hiring a new OSP Executive Director, and the new OSP Executive Director will be responsible for preparing a data management and sharing policy. A data management template has been created and will be prepared prior to grant submissions. The data management requirement has been added to the grant development checklist and timeline. An individual in the Support Center has been identified to ensure timely responses to budget requests on pricing of technology and software in proposed grant budgets.

The UHCL ISO will attend meetings and trainings as needed to explain data management plans. The UHCL ISO will review data management plans with a 24 hour turn around so as not to delay grant submissions.

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The UHS Department of Internal Auditing would like to thank the Office of Sponsored Programs of the University of Houston-Clear Lake, UHCL Associate Vice President for Academic Affairs and the UHCL Information Security Officer for their cooperation and assistance during this review.

Sincerely,

A handwritten signature in black ink that reads "Phillip W. Hurd". The signature is written in a cursive style with a large, sweeping flourish over the top of the name.

Phillip W. Hurd
Chief Audit Executive
University of Houston System

PWH/pwh/AP Audit

Participating Auditors: Tony Moreno, Elias McClellan and Brandee O'Neal

UNIVERSITY of HOUSTON
INTERNAL AUDITING DEPARTMENT

Action Item Number	Audit Area	University	Recommendation Summary	Task	Responsible Person	Targeted Date	Status
1	Policies and Procedures	UHCL	The OSP should develop a sponsored research activities policy.	UHCL is in the process of hiring a new OSP Executive Director, and the new OSP Executive Director will be responsible for preparing a sponsored research policy. The current UHCL OSP Guidelines will be updated to include sections addressing intellectual property, human subjects, animal care, safeguarding research data, conflict of interests for investigators and export controls.	UHCL OSP Executive Director	12/1/2023	Pending
2	Policies and Procedures	UHCL	The OSP should develop a university research data management and sharing policy, including the requirement for a formalized, written data management plan for all university projects.	UHCL is in the process of hiring a new OSP Executive Director, and the new OSP Executive Director will be responsible for preparing a data management and sharing policy. A data management template has been created and will be prepared prior to grant submissions. The data management requirement has been added to the grant development checklist and timeline. An individual in the Support Center has been identified to ensure timely responses to budget requests on pricing of technology and software in proposed grant budgets.	UHCL OSP Executive Director	12/1/2023	Pending
3	Policies and Procedures	UHCL	The OSP should involve the UHCL ISO in research related activities, including, but not limited to, training, meetings with researchers and data management plan reviews.	The UHCL ISO will attend meetings and trainings as needed to explain data management plans. The UHCL ISO will review data management plans with a 24 hour turn around so as not to delay grant submissions.	UHCL Information Systems Officer	9/1/2022	Completed