

THE UNIVERSITY OF CONNECTICUT CONSULTING PROGRAM FY 2015 ANNUAL REPORT

SUMMARY

FY 15 (July 1, 2014 – June 30, 2015) represented the seventh full year of operation of the University's consulting program that was implemented in mid FY '08. The policies and procedures remained materially the same throughout the year. The administrative program coordinator position at the UConn Health Faculty Consulting Office (FCO) successfully went through its first transition.

A new version of the Online Faculty Consulting Approval System (OFCAS-3) became operational on September 15, 2014. The prior version, OFCAS-2 was subject to limitations posed by the needs of the larger and higher priority Quali Finance system. Due to the dedicated work of UITs and an extensive training program, the work flow for approvals has performed well through the transition. The chief concern was that faculty would find it difficult to reconcile reports in two different systems at year end, but appropriate interventions by the FCO resulted in full compliance with these reports. The FY 15 annual report contains combined data from both the former and current systems.

As authorized by the Oversight Committee, a trial took place in which activities eligible for accelerated approval were not routed to the deans and provost's designees. Instead, quarterly audits including random samples of 10% of such activities were reviewed by the FCO. With one exception, the result of these audits was that the department heads were making the correct decisions when approving requests. The one exception was that occasionally the total effort data field had a zero value which is not logical. In no case was this viewed as resulting in a wrong decision regarding whether the activity should have been approved. As a result of this finding, OFCAS-3 has been changed to perform an automatic data check on this value to ensure the input of a number greater than zero.

The Faculty Consulting Offices continue to maintain close working relationships with the Office of the Vice President for Research and the Office of Research Compliance.

As mandated by legislation, the Faculty Consulting Oversight Committee (including a member of the Citizen's Ethics Advisory Board and members appointed by the Legislature) filed its sixth annual report with the UConn Board of Trustees and to the Legislature in the spring of 2015. This was a positive report. The Oversight Committee continues to monitor all audit reports related to the program and will issue its seventh report in the winter of 2016.

CONSULTING MANAGEMENT COMMITTEE

The Consulting Management Committee (CMC) did not need to make any significant revisions to its previous decisions on consulting but did discuss nuances regarding promotional presentations. It continued to review the audit reports and monitor the implementation of management plans.

PERFORMANCE NUMBERS: STORRS+ CAMPUS

The Faculty Consulting Office (FCO) on the Storrs Campus received 1,104 consulting forms from 457 individuals or 30.7 % of those eligible to consult¹ (Table 1). Of these, 1,083 were approved (98% of the total) and 21 (2%) were denied. In FY 14, the FCO received 1,117 requests from 460 individuals with 99% approved and < 1% denied.

All data were analyzed using the information submitted on the FY15 Annual Reconciliation Report. Reconciliation reports were received from all individuals who engaged in consulting activities and who remained on the payroll when reconciliation reports were due. Eleven individuals (24 requests) left employment with UConn-Storrs+ and did not complete a report.

Of the 1,083 approved activities, 983 occurred (91%) and 74 (7 %) were not performed. The remaining 24 (2%) requests were not reconciled by employees who left UConn employment. There were 457 individual faculty members who performed at least one consulting activity during the fiscal year. Throughout the fiscal year, 37 requests were withdrawn; these requests were excluded from the count of requests received.

The mean amount of time spent consulting during normal work time was 2.08 days. Of these, 5 faculty members reported reaching the Provost's recommended maximum of an average of one day per week during normal work hours (39 days for a nine month appointment).

Sixteen (16) faculty members (3.5 % of those who consulted) indicated on their reconciliation reports that they used more time during the normal work hours than originally estimated (Table 3). The maximum number of additional days was 8 with a mean of 1.7 days.

PERFORMANCE NUMBERS: UCHC CAMPUS

The FCO on the UCHC Campus received 767 consulting requests from 171 individuals (Table 3). Of these, 671 were approved (87.5% of the total), 74 (9.6%) were withdrawn or system errors, and 22 (2.9%) were denied. In FY 14 the FCO received 713 requests from 182 individuals with 97.1% approved and 2.9% denied.

Reconciliation reports were received on time from all those who engaged in consulting activities and who remained on the payroll when reconciliation reports were due. Several individuals left employment with UCHC and therefore 25 activities did not have reconciliation reports.

Of the 671 approved activities, 579 occurred and were reconciled (86.3%). There were 152 unique faculty members who performed at least one consulting activity during the fiscal year. The mean amount of time spent consulting during normal work time was 4.5 days. The maximum was 41.6 normal work days.

Eight faculty members indicated on their reconciliation reports that they used more time during the normal work hours than originally estimated (Table 4). Six of these reported using

¹ The total number eligible faculty was obtained from the UConn 2014 Fact Sheet.

no more than one additional day, one indicating no more than 2 additional days, and one using no more than 3 additional days. The department heads will be notified of any unapproved time of more than one day (i.e. for two of the faculty) with a copy also sent to the faculty member.

AUDIT FINDINGS

By State statute, the consulting program must be audited by the Office of Audit, Compliance and Ethics. The original audit schedule was for two a year, but starting in FY 13 the requirement was revised to one audit each year.

The tenth audit, covering the period of time from July 1, 2013 - June 30, 2014 (FY 14) was issued on May 14, 2015. The auditors' overall conclusions were that the University is in compliance with CGS 1-84(r) and the University's Policy on Consulting. The auditors also concluded that the FY 14 Annual Report of the Faculty Consulting Office was materially correct.

The auditors recommended that the Faculty Consulting Offices identify decision makers who routinely delay the processing of requests. The Storrs+ FCO disseminates periodic emails to department and dean delegates when requests remain stagnant. The UConn Health FCO routinely monitors the status of all requests in the system and sends reminders to decision makers to process requests with close starting dates. The use of a proxy system to help department heads process requests has been successful, but in one case the privilege of using a proxy was taken away from a department head and the dean needed to intervene to ensure future requests would be handled in a timely manner.

The auditors raised concerns regarding the process used by faculty to obtain prior permission for each specific day used for consulting during 'normal work time.' Such specific days are not always known at the time a consulting request is submitted. In response to this concern, quarterly reports on consulting activities highlighting the use of normal work time were developed and disseminated to deans and department heads. In addition, at UConn Health personalized emails are sent to faculty with heavy use of normal work time (as defined by more than 5 days), and remind them of their need to obtain permission for the use of specific normal work days and to maintain these written approvals for potential future audits.

The auditors also raised concerns about a small number of faculty members who appear to have consulted during the summer while being paid 100% to be working on research grants. Each of these faculty and their department heads were contacted, some refuted the claims, and steps were taken to remind decision makers that full-time summer employed faculty must document they have allocated full-time to such work (i.e. and no effort has been diverted for consulting.)

OPEN PAYMENTS

The Open Payments program mandated by the Federal Affordable Care Act has completed its second cycle including the public release in June 2015 of payment information for CY 14. This program requires medical/dental device manufacturers and pharmaceutical companies to

report payments made to certain healthcare providers (including physicians and dentists) to the Center for Medicare and Medicaid Services (CMS). Unlike the first release of data in September 2014, the current Open Payments web site is extremely easy to use. To date, we are unaware of any media or governmental inquiries regarding UConn Health faculty for this second cycle. There was modest media interest to the release of information in the first cycle and the level of oversight provided through the Faculty Consulting Program appears to have impressed the reporters we have worked with so far.

ISSUES FOR FY 16

- Continued refinements including consideration of a less frequent schedule for auditing requests eligible for accelerated approval and setting a di minimis level for compensation for certain types of consulting activities.
- Addressing all previously raised and new audit findings.

S. Reis
S. Wetstone
November 13, 2015

Table 1 – Storrs Requests to Consult

Requests		Total	ATHL	BUS	CAHNR	CLAS	ED	ENG	FA	LAW	NURS	PHARM	SW	Other
#		1104	21	45	137	350	126	77	100	23	37	128	16	44
%		100%	1.90%	4.08%	12.41%	31.70%	11.41%	6.97%	9.06%	2.08%	3.35%	11.59%	1.45%	3.99%

Unique Faculty		Total	ATHL	BUS	CAHNR	CLAS	ED	ENG	FA	LAW	NURS	PHARM	SW	Other
#		456	8	27	53	172	44	42	29	11	19	33	11	7
%		100%	2%	6%	12%	38%	10%	9%	6%	2%	4%	7%	2%	2%

Requests/faculty		Total	ATHL	BUS	CAHNR	CLAS	ED	ENG	FA	LAW	NURS	PHARM	SW	Other
mean		2.41	2.63	1.66	2.58	2.03	2.86	1.83	3.45	2.09	1.95	3.88	1.45	2.43
10 or more requests		9	-	-	2	1	-	-	2	-	-	3	-	1

DEFINITIONS:

*STORRS CAMPUS: includes Storrs and Regional campuses, School of Social Work and School of Law

SCHOOL/COLLEGE/UNIT

ATHL	Athletics		
BUS	Business	LAW	School of Law
CAHNR	Agriculture, Health and Natural Resources	NURS	Nursing
CLAS	Liberal Arts & Sciences	PHARM	Pharmacy
ED	Education	SW	School of Social Work
ENG	Engineering	OTHER	Library; Prov & Exvp Acad Affairs, Vice President for Research
FA	Fine Arts		

Table 2 – Storrs Reconciliation Report Variances for Time During Normal Work Hours

Effort During Normal Work Days	
# with extra days	16
% of faculty with extra days	(8%)
min	0.1
max	8.0

Table 3 – UCHC Requests to Consult

Requests	Total	SoDM	SoM
#	735	110	625
%		15.0%	85.0%
Individual faculty	Total	SoDM	SoM
#	164	36	128
%		22.0%	78.0%
Requests/faculty	Total	SoDM	SoM
mean	4.5	3.1	4.9
median	2.00	2.00	2.00
10 or more requests	18	2	16

Table 4 – UCHC Reconciliation Report Variances for Time During Normal Work Hours

Effort During Normal Work Days	
# with extra days	8
% of faculty with extra days	(5.3%)
min	0.2
max	2.5