OFFICE OF RESEARCH ADMINISTRATION NEWSLETTER

"Yale has a clear obligation to comply with all regulations pertaining to the administration of federal grants, and we will spare no effort to remedy any deficiencies in our practices." President Rick Levin

Contributors/Sources

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Office of Research Compliance and Education

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NSF Revises Its Proposal and Award Policies and Procedures Guide

The National Science Foundation (NSF) published a revised Proposal and Award Policies and Procedures Guide (PAPPG) which includes the Proposal Preparation & Submission Guidelines (Part I) and the Award & Administration Guide (Part II). A complete copy of the PAPPG is located at: http://www.nsf.gov/pubs/policydocs/pappguide/nsf11001/gpg_index.jsp?org=NSF and is effective for proposals due or submitted after January 18, 2011.

All NSF PIs should review the revised PAPPG and take special note of the following:

1. NSF Clarifies Policy on Data Management Plans

NSF "clarified" its long-standing policy calling for descriptions of plans for data management and sharing of research products. NSF requires the data management plan or justification for the absence of a need for such a plan as a supplement document to all proposals submitted to the agency (AAG Chapter VI.D.4). Please note that FastLane will not accept a proposal missing a data management plan. The data management plan will be reviewed as part of the intellectual merit or broader impacts of the proposal or both, as appropriate for the scientific community of relevance. Collaborative proposals or proposals with subawardees on a single unified project should submit a single plan.

In describing the plan (in not more than two pages), NSF suggests a plan could include: the types of data, samples, physical collections, etc., that will be produced in the course of the project, any standards to be used for data and metadata format and content, policies for access and sharing including intellectual property provisions, provisions for re-use, re-distribution, and the production of derivatives, and plans for archiving data and for preservation of access to them. A valid plan may include only the statement that no detailed plan is needed, as long as the statement is accompanied by a clear justification.

Did you know that...

When you complete a NIH All Personnel Report form as part of the Progress Report (formerly known as the Senior/Key Personnel Report), that:
- *the PD/PI(s) should always be listed on the form;*
- *regardless of the source of compensation, all personnel who participated in the project for at least one person month should be listed on the form; and*
- *one person month equals approximately 160 hours or 8.3% of annualized effort?*

Yale

NSF has created a website (http://www.nsf.gov/bfa/dias/policy/dmp.jsp) that includes the policy, links to requirements and plans specific to some individual directorates (Engineering, Geological Sciences and Social, Behavioral and Economic Sciences have links at this time), and Frequently Asked Questions.

Yale's Office of Digital Assets and Infrastructure (ODAI) has created a web page to support sound data management practices including sample NSF Data Management Plans, as well as the NIH Data Sharing Policy with examples, templates, referrals and other resources. For further information, please visit: http://odai.research.yale.edu/data-management

2. NSF Prohibits Voluntary Committed Cost Sharing

Inclusion of voluntary committed cost sharing will no longer be allowed on NSF grants. Voluntary committed cost sharing represents a commitment of costs that are associated with a sponsored project, identified in a proposal, but not required or funded by a sponsor. By prohibiting voluntary committed cost sharing in proposals, the NSF hopes it will reduce the perception that cost sharing is necessary for competitive purposes which can lead to unhealthy gamesmanship in the proposal and award process, as well as undermining institutional strategic planning.

Did you know that...

The NIH is further streamlining SNAP? NIH announced that progress reports due on or after August 1, 2010, require the use of the eRA Commons eSNAP module. SNAP provisions have been changed such that:
- *IRB and IACUC review dates are not required in progress reports; and*
- *Reports are due 45 days instead of 60 days before the anniversary date.*

Ensuring Continuing Approval of Human Subjects Research

Federal regulations and Yale University policy require continuous approval by the Yale Institutional Review Boards (HIC and HSC) for all active human subject research studies on at least an annual basis.

When re-approval of a research study does not occur prior to the end of the approval period specified by the IRB, the approval for the research study is considered expired or lapsed. When a study's approval period has expired, several key limitations are triggered:
- No new subject enrollment may occur;
- All research activity must stop (including data analysis);
- Federal funds may not be expended; and
- Study activities cannot resume until after the re-approval has been granted.

Failure to obtain continuing review may result in a finding of non-compliance with University policy and federal regulations and could result in reporting to the Department of Health and Human Services Office for Human Research Protections and federal sponsors.

The IRB recommends submitting requests to renew a protocol at least 30 days prior to the expiration date to allow sufficient time for review and approval without a lapse in approval. To help researchers avoid problems, the IRBs provide re-approval reminder letters to Principal Investigators (PI) via email when a protocol is due to expire. Letters are sent out at 60 days, 45 days and 30 days prior to expiration in order to allow sufficient time for compilation of a re-approval request, submission, review, and approval. If the protocol is not reapproved by the expiration date, another letter is sent within 7 days after expiration to inform the Investigator that IRB approval has expired and all research activities must stop. If the renewal paperwork still has not been received by the IRB by 30 days after the expiration of approval, the IRB office closes the study administratively. Please note that although the IRBs do provide these reminders as a courtesy, it is ultimately the responsibility of the PI to ensure that continuing review of his/her research protocols is obtained.

Status of Applications and Awards Involving Human Embryonic Stem Cells

The United States District Court has issued an interim ruling that allows stem cell research to continue while the NIH presents further arguments to the Court. With a temporary stay in place, NIH has resumed intramural research and will continue its consideration of grants that were frozen by an injunction on August 23, 2010. The suspension of all grants, contracts, and applications that involve the use of human embryonic stem cells has been temporarily lifted.

IRES (Integrated Research Enterprise Solutions) Update – PT View Deployment

In May 2010, Yale launched the Integrated Research Enterprise Solution (IRES) pre-award system for capturing proposal and conflict of interest information within the Office of Grant and Contract Administration (GCA) and the Conflict of Interest Office respectively. The next phase of the IRES roll-out is to provide business administrators the ability to view proposal information in the Proposal Tracking (PT) module. In doing so, administrators will be able to:

- Verify proposal information submitted to GCA;
- View the status of proposals, contracts, and awards;
- Review compliance (i.e., human and animal subjects approvals and COI) related information; and
- Review award setup information.

A successful Pilot of PT view for select administrators was conducted earlier this year. As a result, the IRES team will make available to additional business administrators PT view capability in order to verify the status of proposals and awards. It is anticipated that the IRES team will conduct training throughout the fall and early winter.

Upcoming Research Administration Training/Educational Events

Brown Bag Luncheon Series

- *Join the X-train and Learn About the New Requirement to Submit Training Grant Statements of Appointment and Termination Notices Electronically*
  Date: Thursday, November 18, 2010
  Time: 12:00 PM – 1:30 PM
  Location: Hope – H103

Faculty Forums

- *How to Write an Effective 2-3 page Preliminary Proposal: Competing Successfully for Scholar Awards, Pilot Projects, and Other Limited Submissions*
  Date: Monday, November 29, 2010
  Time: 8:45 AM – 10:15 AM
  Location: The Anlyan Center Auditorium (TAC N107), 300 Cedar Street

- ***Obtaining Grant Support in 2011: Not Your Mentor's NIH!***
  Date: Wednesday, December 15, 2010
  Time: 3:00 PM – 4:00 PM
  Location: The Anlyan Center Auditorium (TAC N107), 300 Cedar Street

Fundamentals of Sponsored Projects: Administration 2-day training program:

- Date: December 6th and 7th, 2010
  Time: 9:00 AM - 4:30 PM
  To complete the course attendees must attend both full day sessions.

Additional Training For Faculty And Administrators

Grant and Contract Financial Administration (GCFA)
- Allowability of costs and Cost Transfer Principles
- Effort Reporting Principles (web-based)
- Effort Reporting System Training
- Subrecipient Basics, Monitoring and Tracking (web-based)
- What Research Staff Need to Know About Spending Sponsored Project Funds

Grant and Contract Administration (GCA)
- Hands-on Clinic – Grants.gov
- Fundamentals of Export Controls (web-based)
- Human Research Protection Training (options for training are described at
  http://www.yale.edu/hrpp/responsibility/training.html)

To learn more or to register for the above educational opportunities, visit http://www.yale.edu/training/ Navigate to Grant & Contract Training and click Courses under GCA and GCFA Training.

Office of Research Administration (ORA)
- Sponsored Projects Administration Training for Faculty (web-based)

To access this course visit http://www.yale.edu/training/ Navigate to Office of Research Administration Training and click Courses.

OFFICE OF RESEARCH ADMINISTRATION MISSION STATEMENT

To coordinate the activities of the various University offices providing support to faculty, staff and students on sponsored projects, to assure that service provided by those offices is of the highest caliber and professionalism, and to serve as an effective representative for the research enterprise.