

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*

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NIH Grant Funding Will Be Impacted by Continuing Resolution

The Department of Health and Human Services continues to operate on a continuing resolution (CR) as specified in Public Law 111-322, which was signed by the President on December 22, 2010. The CR allows the continuation of government operations at 2010 enacted levels through March 4, 2011.

Until the final FY 2011 appropriation is available, the National Institutes of Health (NIH) will issue non-competing research grant awards at a level below that indicated on the most recent Notice of Award (generally up to 90% of the previously committed level). This is consistent with NIH policies during the CRs between FY 2006 and FY 2010 as well as the policy announced earlier in the current fiscal year (see [NOT-OD-11-015](#)). NIH will consider adjustments to these levels after the final appropriation is enacted, but expects institutions to monitor their expenditures carefully during this period. Questions regarding adjustments applied to individual grant awards may be directed to the Grants Management Specialist identified on the Notice of Award.

Two Important Reminders on Export Controls at Yale

Export controls are U.S. laws and regulations governing the “export” of certain controlled technologies, services and information to foreign nationals, foreign entities or foreign countries for reasons of national security and foreign policy.

What is an export?

- An actual shipment outside of the U.S. of controlled equipment or materials (actual items) or any disclosure of information or technical data related to controlled equipment or materials by any means (verbal, email, fax, visual inspection, internet or training) outside the U.S or inside the U.S. to a foreign national; or
- Disclosure of information or technical data to a foreign national in the U.S. (at Yale), a so-called “deemed export”. For deemed exports, foreign nationals would be any person who is not a lawful permanent resident of the U.S., a group not

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Did you know that...

Before an award can be set-up, GCA must verify that all PI's, Co-PI's, Co-investigators and other members of the research team identified by the PI as having a responsibility for the design, conduct, or reporting of the research have a current external interest disclosure form on file in the COI Office and the COI Office if appropriate, has conducted a transactional review? For more information regarding transactional reviews please [click here](#).

TWO IMPORTANT REMINDERS ON EXPORT CONTROLS AT YALE (CONTINUED)

organized to conduct business in the U.S. or a foreign government (or any branch of a foreign government).

While all activities at Yale need to be in compliance with export control laws, most research activities at Yale are not affected by export controls due to the “Fundamental Research Exclusion”. This exclusion covers basic and applied research that results in publications and open dissemination of research results as distinguished from proprietary research and industrial development, design, production and product utilization, the results of which ordinarily are restricted for proprietary or national security reasons.

Generally, terms and conditions of an award which prevent free and open access to the participation in the research endeavor or the dissemination of research results are suspect. In particular, the following restrictions are problematic:

- The inability to participate, access, or hire faculty, students or staff for the conduct of the research program based on their nationality or citizenship, including limiting participation to U.S. citizens.
- Disclosure of information or research results or access to equipment on faculty, students, or staff based on their nationality or citizenship, including limiting participation to U.S. citizens.
- Sponsor prior approval to the disclosure or

publication of information or research results generated in the conduct of the sponsored research or granting the sponsor the right to require that such information or research results be treated as confidential information.

In addition, federal regulations exist that control exports based not on the nature of the technology but rather on the individual and country involved in the transaction. These particular export control regulations are administered by the Office of Foreign Assets Controls (OFAC). The general rule is transactions of value (payments, providing services, collaborations) with certain countries and individuals are prohibited without a license from the U.S. government. Countries in the OFAC regulatory regime of greatest concern are Cuba, Iran, Sudan, Syria and N. Korea. OFAC’s concerns include terrorism, proliferation of weapons, illegal exporting activities and other such activities. Yale representatives involved in any capacity with these countries, such as travel to such countries, making a payment to an individual or entity in such country, or providing a service or collaborating with an individual or entity in such country must apply for and receive from the federal government a license prior to conducting business with these countries or individuals from these countries. This receipt of a license can be a lengthy process so the need for a license should be identified as early as possible.

Yale’s Human Research Protection Program (HRPP) Granted Accreditation

Protecting research study volunteers is the key mission of the Yale Human Research Protection Program. In December, Yale’s program was granted full accreditation by the Association for the Accreditation of Human Research Protection Programs (AAHRPP).

Yale’s accreditation provides an assurance to research participants, sponsors, government regulators and the general public that the University’s human research protection program is focused first and foremost on excellence. Yale is the 223rd HRPP to receive accreditation throughout the

world. Yale’s HRPP includes its five institutional review boards; programs for education, monitoring, compliance and community outreach, as well as research investigators and related research oversight programs of the University.

The accreditation process required in-depth evaluation of the policies and procedures related to the conduct and oversight of human research to confirm that they not only meet regulatory standards but are also industry best practice for protection of research volunteers.

Did you know that...

Yale University’s FY11 compensation policies for postdoctoral appointees have been established? As a result of a review of postdoctoral compensation, the University over the next two years will bring the postdoctoral fellows/associates remuneration to NIH’s National Research Service Award levels. [Click here for additional information.](#)

Did you know that...

NSF established a web site through which you can submit your thoughts and ideas regarding NSF's intellectual merit and broader impacts review criteria? As you are aware, the National Science Foundation strives to conduct a fair, competitive, transparent merit-review process for the selection of projects. All NSF proposals are evaluated through use of two National Science Board approved merit review criteria: intellectual merit and broader impacts. In some instances, however, NSF will employ additional criteria as required to highlight the specific objectives of certain programs and activities. For example, proposals for large facility projects also might be subject to special review criteria outlined in the program solicitation.

The National Science Board is seeking your input regarding the merit review process and welcomes your comments. To comment, please click [here](#). Comments must be received no later than March 15, 2011.

IRES Update

Since November, 190 business office staff members from 39 central and medical school departments have attended training and gained access to the Office of Grant and Contract Administration's (GCA) proposal and award data base IRES. Why is this training important? With the ability to access real time sponsored project information, business offices can more efficiently respond to PI inquiries as well as view the same data as the GCA staff improving overall data transparency and integrity. Departments that have not yet received training will be invited to do so in the coming months.

Access to IRES provides business office staff the ability to verify proposal information submitted to the GCA, view the status of proposals, contracts, awards, and view compliance-related information (human and animal subjects protocol approvals and conflict of interest disclosure status).

In addition, two new IRES reports are available to the community. The Portfolio Report provides

aggregate and detailed views of pre-award data, while the Portfolio Allocation Report provides information to assist with budgeting and success rates.

Campus wide auditorium sessions and subsequent clinical sessions will be held during the next two months.

IRES Proposal Development (PD) will be the next module to be brought on line. The PD module standardizes the proposal development process for faculty and reduces duplicate data capture. In the future, PIs and business office staff will enter data directly into IRES and will be able to utilize IRES for budgeting proposals, effort commitment tracking, and electronic approval/routing.

A PD pilot is scheduled for April with a small group of faculty and administrators. After an assessment of the pilot, PD will be introduced in a phased roll-out to the larger research community.

Did you know that...

NIH's Center for Scientific Review (CSR) has created a new web page that can assist you in determining whether your resubmission application would be considered an unallowable duplicative or overlapping application? Visit CSR's Evaluation of Unallowable Resubmission and Overlapping Applications page for assistance. Its address is: <http://cms.csr.nih.gov/ResourcesforApplicants/OverlapEvaluation.htm>

Upcoming Research Administration Training/Educational Events

Brown Bag Luncheon Series

- ***Subcontract Invoicing: One Year Later***
Date: Wednesday, February 23, 2011
Time: 2:00 PM – 3:30 PM
Location: Brady Auditorium

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UPCOMING RESEARCH ADMINISTRATION TRAINING/EDUCATIONAL EVENTS (CONTINUED)

Funding/Grantsmanship Training Programs:

- *Show Me The Money: Using Internet Databases and Email Alerts to identify Funding Sources for Your Research*

Date: February 23, 2011

Time: 3:00 PM – 4:30 PM

Location: Anlyan Center Auditorium (TAC N107)

Research Compliance Principles for Administrators (new program offered quarterly)

Date: February 22, 2011

Time: 3:00 PM – 4:30 PM

Location: Anlyan Center Auditorium (TAC N107)

Fundamentals of Sponsored Projects Administration: 2-day training program (offered monthly)

Date: April 4th and April 5th

Time: 9:00 AM – 4:30 PM

Location: 47 College Place, Room 212A

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.