

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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FAS and FES Salary from Grant Funds

The opportunity to participate in the “9-over-9” salary program will occur in May. This program permits faculty in the Arts and Sciences and Forestry and Environmental Studies to direct charge up to 4.5 months of salary and corresponding benefits to sponsored projects during the academic year coincident with the effort devoted to the project. Participation in this program enables salary to more accurately reflect effort devoted to research during the academic year, and provides faculty with an equivalent amount of salary dollars directly charged during the academic year to a research account for his or her use.

In order to participate in the program, faculty business offices should review and return enrollment forms to the Provost’s Office by **May 28, 2010** for FY 2011. Faculty previously enrolled will be unenrolled from the program after July 1st. This means that all faculty who wish to participate in the program, regardless if they participated last year, must be enrolled by Friday May 28, 2010.

Contributors/Sources

Office of the Provost

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National Institutes of Health

Office of Research Administration

Office of Research Compliance and Education

Information Security Requirements: What You Should Know

In the course of carrying out its academic, research, and clinical missions, Yale’s faculty, staff and students collect information that may include both academic, research, protected health and personal related data. Yale and its employees, under U.S federal and state data privacy and security laws, have an obligation to implement appropriate safeguards to protect such confidential information residing both inside and outside of the United States.

In addition, external entities may place requirements on the use of their data and data sets in order to protect human subject research within the Yale School of Medicine, the School

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Did you know that...

To meet the legislative goals of creating jobs and increasing the tempo of scientific research, NIH expects grantees to work expeditiously to employ scientific staff and conduct their research consistent with the terms of awards? While NIH grants policy allows grantees who require more time to complete their work beyond the additional year to request approval from the NIH awarding Institute/Center for additional time; such requests for ARRA grants will not be approved unless grantees can document that no other source of Federal or non-Federal funds is available to continue funding the work. The following Notice provides additional information on ARRA no cost extensions. <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-o67.html>

of Nursing, Department of Psychology clinics and Yale University Health Services. These units are covered by the Health Insurance Portability and Accountability Act (HIPAA), privacy and security rules, and the HITECH Act (Health Information Technology for Economic and Clinical Health) breach notification requirements.

Data security requirements are complex. Many researchers and departments may not have the required financial, IT, and human resources to implement and support such requirements.

When submitting proposals to external sponsors, budgets should be developed with a full understanding of costs related to IT and information security roles and responsibilities, and in advance of entering into a sponsored research agreement with a sponsor.

In May the Office of Grant and Contract Administration will add to its new proposal transmittal form a question about the sponsor's data security requirements. The requirement is usually specific to federal contracts and will normally be addressed in the sponsor's announcement/solicitation. Types of solicitations that may include such a requirement are Broad Agency Announcements (BAA), Requests for Proposal (RFP) and Requests for Quote (RFQ). The most often cited references to the requirements are the

Health Insurance Portability and Accountability Act (HIPAA) which falls under the Privacy Act, Federal Information Security Management Act (FISMA), the Family Educational Rights and Privacy Act (FERPA), and the National Longitudinal Study of Adolescent Health (Add Health) Project.

If you are preparing a proposal in response to a solicitation with an information security requirement, be sure to consider and include the cost of implementing this requirement in the proposal budget. See contacts below for budgeting assistance.

Getting Help:

- GCA proposal-related questions including budgeting: <http://www.yale.edu/grants/contacts/> : Your assigned reviewer
- Information Assurance & Compliance including HIPAA 'Security': security@yale.edu, <http://security.yale.edu/contact.html>
- HIPAA 'Privacy': hipaa@yale.edu
- ITS Information Security (including assistance with budgeting) at faith.mcgrath@yale.edu; 737-4087

Additional Information:

- Federal Agency Policies & Information Security: <http://www.yale.edu/grants/policies/>
- Legal requirements & data security: <http://www.yale.edu/its/secure-computing/data/compliance/>

COI Corner

New Web-based External Interests Disclosure Form Introduced

On April 21, 2010, Provost Peter Salovey announced two significant changes to Yale's Conflict of Interest (COI) and Conflict of Commitment (COC) reporting process. First, a change in policy that eliminates disclosure of certain activities requiring disclosure and second, a new web-based External Activities and Financial Interests (referred to as External Interests) Disclosure form that was introduced on May 3, 2010 and replaced the COI-COC disclosure form.

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Did you know that...

Faculty who are a PI are required to take the Sponsored Projects Administration for Faculty education module? This education opportunity is available through the Training Management System (TMS).

The requirement is triggered the first time you submit a proposal and it is at that point in time that it will appear in TMS as a training requirement. If you anticipate submitting a proposal for the first time and would like to complete this educational opportunity prior to submitting the proposal to the sponsor please [click here](#) to access the module. If you have trouble accessing the module or have questions regarding this requirement, please contact researchadmin@yale.edu .

The new External Interest Disclosure form is part of IRES (Integrated Research Enterprise Solution), Yale's new integrated research administration system. The new External Interests Disclosure form incorporates many suggestions made by faculty on how to streamline the process, improve reporting, and reduce the time for completing the form.

As they have in the past, faculty and other individuals who are required to disclose external interests will receive an email notification when their annual disclosure is due. First time users of the new web-based form will be required to re-enter their disclosure information; information from their previous disclosure will not be migrated into the new system. Once entered, however, the information will be saved for future editing.

Accessing the External Interests Disclosure Form

Because the disclosure form is web-based, it can be accessed from anywhere via the Internet with a valid Yale NetID and password. A VPN (Virtual Private Network) connection is required when working from an off-campus location. VPN software can be accessed from the Yale Software Library: www.yale.edu/its/software, click on VPN – Cisco Client, and select the applicable operating system.

Not sure of your NetID or password to log in?

Go to: <https://veritas.its.yale.edu/netid/FindNetID.do>

For more information about the new disclosure system, policy and procedures, review frequently asked questions or complete the disclosure form, please visit the following website: <http://www.yale.edu/coi/>.

First Phase Leading to HRPP Accreditation Complete

Yale's Human Research Protection Program (HRPP) recently completed the first application phase required for accreditation of its program. Yale's policies, procedures, forms and other documents used by the Institutional Review Boards (IRBs), the Office of Grant and Contract Administration (GCA), and others, were reviewed, revised, or implemented during this initial phase. The initial submission was sent to the accrediting body, the Association for the Accreditation of Human Research Protection Programs, Inc. (AAHRPP), as part of this phase.

During the upcoming months, the HRPP will work closely with AAHRPP in completing the remaining parts of the application. The application process will culminate with an onsite visit at which time many members of Yale's human research community will be interviewed to demonstrate their knowledge and practice of HRPP policies and procedures. The final decision related to accreditation status is made by the AAHRPP Council and is anticipated toward the end of 2010 or early 2011.

For more information on Yale's HRPP visit www.yale.edu/hrpp

ORA Welcomes Gene Hines

After a nationwide search, and in consultation with academic leadership and faculty researchers, effective March 29th, Gene Hines, Ph.D. joined the Office of Research Administration (ORA) as the Director of the Institutional Animal Care and Use Committee (IACUC) Office. Gene joins Yale from the University of Alabama at Birmingham (UAB) where he served for eleven years as the Director of UAB's IACUC Office. His experience both as an administrator and researcher will serve to facilitate faculty research in this important area. Gene will be located at 47 College Place. His email address is gene.hines@yale.edu and his telephone number is 727.5236.

Did you know that...

If a Principal Investigator receives approval to spend funds in advance of receiving an award, and the sponsor delays the start date beyond the approved period (usually 90 days), that the PI/Department is responsible for any overruns outside the approved period? The status of award notification, acceptance, and negotiation should be carefully monitored throughout the advance account period.

Did you know that...

The maximum amount **awarded** by the National Institutes for Health (NIH) for support of a graduate student supported on a research grant is tied to the zero level National Research Service Award (NRSA) stipends in effect at the time the grant award is issued? When submitting an application to the NIH, the actual institutional-based compensation should be requested in the budget. The NIH will review the requested budgeted amount and make any adjustments as appropriate. Institutions may rebudget funds to charge more than the awarded amount **provided that the graduate student is not paid in excess of the amount paid including fringe benefits to a first-year postdoctoral scientist performing comparable work at Yale.**

The following situations are provided as guidance to PIs to better understand the funding of NIH graduate students. Note that compensation of the Graduate student includes stipend/salary, fringe benefits and tuition remission.

Example 1:

Standard Graduate student compensation	\$40,000
NRSA zero-level stipend	\$36,996
Amount awarded by NIH	\$36,996
Grantee's first-year post-doc rate	\$42,000
Maximum chargeable rate	\$40,000

In this case, following award, the grantee could re-budget \$3,004 from some other budget category in order to support the full compensation rate of \$40,000, and could charge that full amount to the award.

Example 2:

Standard Graduate student compensation	\$45,000
NRSA zero-level stipend	\$36,996
Amount awarded by NIH	\$36,996
Grantee's first-year post-doc rate	\$42,000
Maximum chargeable rate	\$42,000

In this case, it is the grantee's standard first-year post-doc rate that is the ceiling. The grantee would be permitted to re-budget \$5,004 away from some other budget category to provide further support for the graduate student's compensation, but could not charge the grant at a rate in excess of the \$42,000 first-year post-doc rate.

If you have questions regarding the funding levels of a graduate student, please contact your Office of Grant and Contract Administration Team Lead for assistance.

Upcoming Research Administration Training/Educational Events

Brown Bag Luncheon Series

- **Cost Transfers:**

June 29, 2010; 12:00 PM – 1:30 PM
Anlyan Center Auditorium, 300 Cedar Street, N107

- **Award Closeout:**

July 15, 2010; 12:00 PM – 1:30 PM
Anlyan Center Auditorium, 300 Cedar Street, N107

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

June 15, 2010 – June 16, 2010
9:00 AM – 4:30 PM
25 Science Park, Room 125

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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
- Sub recipient 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)

Office of Research Administration (ORA)

- Sponsored Projects Administration Training for Faculty (web-based)

*To learn more or to register for these sessions, visit <http://www.yale.edu/training/>
Navigate to Grant & Contract Training and click Courses under GCA and GCFA Training.*

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 at Yale University and nationally.