

# 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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## Yale University Human Research Protection Program: Applying for Accreditation

Yale University prides itself as being one of the world's major research universities. Throughout the years, Yale's renowned researchers have contributed significantly to the advancement of science, medicine and knowledge. Yale's research excellence is enhanced by the University's commitment to the highest ethical standards and practices in the conduct of research. In order to further strengthen Yale's research infrastructure, the University will be applying this fall for accreditation by the Association for the Accreditation of Human Research Protection Programs, Inc. (AAHRPP).

At present there are over 180 organizations that have been accredited. The list includes organizations in the biomedical, behavioral and social sciences research fields and represent Veterans Affairs hospitals, community hospitals, academic medical centers, universities, independent institutional review boards and research institutes.

Accreditation demonstrates Yale's commitment to meeting the highest standards for protecting human research volunteers. To achieve accreditation, the University is evaluated against standards designed by AAHRPP. These standards represent the current thinking among practitioners.

Yale's success in achieving accreditation will require that researchers, Institutional Review Board members and other members of Yale's extended research community are knowledgeable about the policies and procedures related to human research. These individuals may be interviewed during the accreditation visit and may be asked to demonstrate their knowledge of relevant Yale Human Research Protection Program policies and practices.

In the upcoming months members of Yale's research community will receive updates regarding revised policies and other information as the accreditation application is prepared. We look forward to your cooperation as we embark on this initiative to further enhance Yale's distinguished research reputation.

### Contributors/Sources

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National Institutes of Health  
National Science Foundation

ORA Staff

### Did you know that...

*As of the date of this publication, Yale has received and entered into its accounting system 241 American Recovery and Reinvestment Act awards totaling \$78.9M?*

Effective January 4, 2010 the National Science Foundation (NSF) will require that, at the time of proposal submission to NSF, Yale certifies that it has a plan to provide appropriate training and oversight in the responsible conduct of research (RCR) to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research. Though training plans are not required to be included in NSF proposals, they will be subject to review upon request.

NSF also will modify its standard award conditions to clearly stipulate that grantee institutions **are responsible for verifying** that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received RCR training. As part of this new mandate, NSF intends to support the development of an on-line RCR resource containing research findings, pedagogical materials, and promising practices regarding RCR in science and engineering. The development and evolution of an ongoing online RCR resource will be informed by the research communities that NSF supports, and it will serve as

a living resource of multimedia materials that may be used to train current and future generations of scientists and engineers in RCR.

NSF does not intend to issue NSF-specified RCR standards and recognizes that training needs may vary depending on specific circumstances of research or the needs of students intending to pursue careers in a variety of science and engineering settings after completing their education. Therefore, it is Yale's responsibility to determine both the content and the delivery method for the training that will meet Yale's particular needs for RCR training in all areas for which NSF provides support. At this time, Yale is exploring whether or not appropriate content and training can be provided with existing sources or capabilities, or whether other training options should be provided.

This new RCR training requirement does not replace the requirement for mentoring postdoctoral researchers that went into effect earlier this year. The entire Federal Register announcement is available at: <http://edocket.access.gpo.gov/2009/pdf/E9-19930.pdf>

## Can a Post Doctoral Fellow also receive additional compensation?

### Compensation for Services

Post doctoral appointees supported and receiving a stipend from federally funded fellowships such as the National Institutes of Health (NIH) National Research Service Award (NRSA) are permitted to teach with appropriate written approvals from both the University and sponsor (for additional information, please review the Provost's memo dated October 24, 2008, available at [http://www.yale.edu/provost/html/provost\\_itr\\_pdateaching.html](http://www.yale.edu/provost/html/provost_itr_pdateaching.html)).

In addition, federal sponsors such as the NIH recognize that fellows may seek part-time employment incidental to their training program to offset expenses. Funds characterized as compensation may be paid to fellows only when there is an employer-employee relationship and the payments are for services rendered. Under these conditions, the funds provided as compensation (salary, fringe benefits) for services rendered, such as teaching or laboratory assistance, *are not to be considered stipend supplementation*; they are allowable charges to federal awards, including NIH research grants. However, it is expected that:

- Compensation from research grants will be for limited part-time employment apart from the normal training activities.
- Compensation may not be paid from a research grant (unless specifically approved by the sponsor) that *supports the same research* that is part of the fellow's planned training experience as described for example, in an NRSA fellowship application.
- Under no circumstances may the compensated services interfere with, detract from, or prolong the fellow's approved training program. Fellowship sponsors such as the NIH must approve all instances of employment on research grants in writing prior to the work commencing to verify that the circumstances will not interfere with, detract from, or prolong the approved training program.
- An effort report will be completed certifying to the effort for which the compensation was received. (A new Earnings Element is in the process of being created and more information will be forthcoming.)

**Stipend Augmentation**

If a post doctoral appointee receives a fellowship and the stipend offered by the sponsor does not meet Yale's minimum threshold, the stipend can be augmented or supplemented to meet that minimum threshold. The augmentation dollars may come from University sources or externally funded awards which permit such augmentation. **Augmentation of a stipend from a federal research award is not permitted.** A federal research award can only be charged when there is an employer-employee relationship and the payment is considered compensation for services rendered and is commensurate with the effort devoted. As stated above, a post doctoral fellow may not be compensated from a research grant that supports the same research that is already part of the fellow's planned training experience; some fellowship sponsors such as the NIH impose a prior approval requirement.

**Did you know that...**

*On August 12, 2009 the Office of Cooperative Research sent an email via the Training Management System to over 6,700 Yale faculty, students, and staff who were paid on sponsored projects during FY09 asking them to complete a Patent Policy Acknowledgment & Agreement form? This requirement has been a policy of the University and the Bayh-Dole Act for over 25 years. Since roll-out, the community has been outstanding in its response and over 5,500 people have completed this requirement. Thank you.*

**Research Administration Training Opportunities****UPCOMING TRAINING EVENTS****Brown Bag Luncheon Series**

- **Everything you need to know about shipping and exporting research materials**  
Wednesday, October 21, 2009  
12:00 – 1:30 PM  
TAC (The Anlyan Center) N107  
300 Cedar Street
- **Subrecipient Invoice Receipt and Processing**  
Monday, November 16, 2009  
12:00 – 1:30 PM  
Child Study Center, Cohen Auditorium  
230 South Frontage Road
- **Material Transfer Agreements at Yale: An Update**  
Wednesday, December 9, 2009  
12:00 – 1:30 PM  
Sterling Chemistry Laboratory, Room 110  
225 Prospect Street

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

November 10–11  
9:00 AM – 4:30 PM  
155 Whitney Avenue, Room 110

OR

December 1–2  
9:00 AM – 4:30 PM  
155 Whitney Avenue, Room 110

To learn more and/or to register for these sessions, visit <http://www.yale.edu/training/>, navigate to Grant and Contract Training, then Click on Courses under GCA and GCFA Training.

## **Additional Training for Faculty and Administrators**

### **Grant and Contract Financial Administration (GCFA)**

- Allowability of Costs and Cost Transfer Principles
- Effort Reporting Principles
- 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

### **Office of Research Administration (ORA)**

- Sponsored Projects Administration Training for Faculty–web based

*To learn more and/or to register for these sessions, visit <http://www.yale.edu/training/>, navigate to Grant and 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.**