



# SPONSORED PROJECTS HANDBOOK

## Introduction

This Sponsored Projects Handbook is designed to assist new and established investigators and business administrators in the conduct of research at Yale University.

The Handbook has three main goals:

- To support the University's research effort by providing guidance regarding the development and administration of sponsored research projects.
- To inform Principal Investigators/Project Directors (PIs/PDs) of their roles and responsibilities in research administration and compliance and to indicate the roles of staff in supporting the research effort.
- To collect and organize information pertinent to sponsored projects administration in a single document and make that information accessible to all interested parties.

While this handbook is a compendium of official statements of University policy, and every attempt is made to keep the Handbook current, readers must necessarily rely on policy links which are referenced through out the document.

As this guide is intended to be an evolving reference work and may be updated frequently, check back often to make sure that you have the latest information. Your suggestions for changes and improvement are welcome and encouraged and should be sent to [penny.cook@yale.edu](mailto:penny.cook@yale.edu).

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# Chapter 1

## **Standards for the Conduct of Research at Yale University**

It is Yale policy to encourage research and scholarly activities essential to the training of students, the advancement of knowledge, and the intellectual growth of faculty. Yale has developed a set of guiding principles and policies that are applicable to research and scholarly activity.

### **1.1 Yale University Standards of Business Conduct**

Each member of Yale University is expected to adhere to the University's Standards of Business Conduct in dealings inside and outside of the University. These principles are designed to serve as a distillation of well established precepts, policies, and procedures and to reinforce the importance of adhering to them in all business dealings.

**[Yale University Standards of Business Conduct](http://www.yale.edu/provost/html/standards.html)**  
<http://www.yale.edu/provost/html/standards.html>

### **1.2 Academic Fraud and Misconduct**

The University believes that the academic community must do everything within its power to guard against academic fraud, and as part of that responsibility has in place detailed and well-established procedures for dealing with allegations of academic fraud in a timely and fair manner.

**[Policies and Procedures for Dealing With Allegations of Academic Fraud At Yale University](http://www.yale.edu/grants/policies/academic-fraud.html)**  
<http://www.yale.edu/grants/policies/academic-fraud.html>

### **1.3 Faculty Training**

Faculty who apply for externally sponsored projects must complete the following courses before they can accept a sponsored research award.

**The Financial Administration of Sponsored Projects** provides basic training in the financial responsibility for Faculty on a sponsored award.  
<http://learn.yale.edu/ra/>

**Human Subjects Training** for study personnel who are involved in the design, performance, data acquisition or analysis of a study. The definition also includes any person who may have significant contact with a human subject or identifiable information or data about a subject during the course of a study. These personnel may include student assistants, nurses, technicians, study coordinators and general assistants. The requirement extends to all funding mechanisms. The training requirement can be met by completing either the Yale web-based training program, the Human Participation Protection Education for Research Teams training program or by providing documentation and certification of completion from some other training provider, i.e., another University's training program.

**[HIC Training](http://info.med.yale.edu/irbtraining/)**  
<http://info.med.yale.edu/irbtraining/>

**The Yale Animal Resource Center (YARC) training** is required by the Animal Welfare Act and requires that institutions provide training for researchers on the humane care and use of animals, including methods to minimize pain or distress. Training services are available through YARC. Research staff may call 785-4722 for more information about the training sessions. Pre-registration for courses is

available at <http://www.yale.edu/training/> for Institutional Animal Care and Use Committee (IACUC) Orientation, Wet Labs Training, Basic Principles in Rodent Handling, Rodent Inhalation Anesthesia, Rodent Aseptic Survival Surgery, and other Specialized Training.

#### **1.4 Responsible Conduct of Research**

In response to a perceived need by federal and private granting agencies and associations, the University has published Guidelines for the Responsible Conduct of Research outlining the responsibilities of faculty and university officials in the conduct of research.

**The Responsible Conduct of Science**  
<http://www.yale.edu/grants/policies/rcr.html>

##### **1.4.1 Authorship**

Investigators should understand and properly fulfill their responsibilities with respect to authorship consistent with the uniform requirements for manuscripts submitted to biomedical journals.

**The Responsible Conduct of Science**  
<http://www.yale.edu/grants/policies/rcr.html>

##### **1.4.2 Mentorship/Supervision of Research Trainees**

Trainees have both the right and responsibility to be certain that they are adequately supervised during their research training and that the research itself is performed in a manner which reflects high standards for the responsible conduct of science.

NIH training grants require training in ethics/responsible conduct of research (RCR) for graduate students and postdoctoral fellows. Many departments and programs have organized their own ethics programs in support of institutional training grants. Individuals applying for individual NRSA fellowships must provide a description of the ethics training they will be receiving. The individual should describe whatever ethics/RCR training program is available in their own department or a closely related department. The postdoctoral office website maintains a list of departmental ethics training programs that are open to others.

The NIH maintains a list of resources available on the Internet to those with an interest in bioethics including education, research involving human participants and animals, medical and health care ethics, and the implications of applied genetics and biotechnology.

**The Responsible Conduct of Science**  
<http://www.yale.edu/grants/policies/rcr.html>  
**Yale University's Interdisciplinary Center for Bioethics**  
<http://www.yale.edu/bioethics/>  
**Bioethics Resources on the Web**  
<http://www.nih.gov/sigs/bioethics/>  
**Responsible Conduct of Research**  
<http://www.yale.edu/researchadministration/RCR.html>

##### **1.4.3 Management of Data**

The University requires that all documents related to federally sponsored projects, including primary research data, be available to federal auditors for the period specified by federal regulation – in most cases, a period of three years from the filing of the final required financial report. Non-federal sponsors typically require that records of a project

be retained for periods from 3 to 7 years. This requirement applies to original data as well as financial records relating to a project. It includes records in all formats, including paper and electronic files (e-mail, word-processed documents, spreadsheets, databases, and materials in imaging systems).

Laboratory notebooks containing raw data are under the custody of the research team leader and should remain in the laboratory where the work was done or other bona fide research location whether resulting from federal sponsorship or not, and access to the data must be provided when requested to do so by authorized institutional officials. The University encourages the use of storage methods that eliminate waste, reduce cost, and promote efficiency.

Requests from sponsors for access to research data, as well as subpoenas for research data, must be forwarded to the Office of Grant and Contract Administration or to the Office of the General Counsel.

**The Responsible Conduct of Science**

<http://www.yale.edu/grants/policies/rcr.html>

**Policy 1105: Retention of University Financial Records**

<http://www.yale.edu/ppdev/policy/1105/1105.pdf>

**1.5 Sexual Harassment**

Sexual harassment is antithetical to academic values and to a work environment free from the fact or appearance of coercion. It is a violation of University policy and may result in serious disciplinary action.

The University provides training and education about sexual harassment. All members of the faculty and staff who have the authority to hire, discharge, assign, or direct one or more individuals must attend one session.

**Guide for Faculty and Students**

<http://www.yale.edu/hronline/forms/shbroch.pdf>

**Information on Classroom Training**

<http://learn.caim.yale.edu/lcdb/courses/classinfo.asp?CourseID=84>

**1.6 Equal Opportunity**

Yale is an equal opportunity employer and does not discriminate in employment against any individual on account of that individual's sex, race, color, religion, age, disability, or national or ethnic origin; nor does Yale discriminate on the basis of sexual orientation.

**Office for Equal Opportunity Programs**

<http://www.yale.edu/equalopportunity/programs/>

**1.7 Disclosure of Conflict of Interest**

All faculty members with University appointments of greater than 50% time; all faculty who hold administrative positions; and all faculty and non-faculty personnel who are responsible for the design, conduct or reporting of research (being "engaged in research") are required annually to submit a conflict of interest/conflict of commitment disclosure describing their external activities and significant financial interests. Further they must update these disclosures when significant changes occur or when they may affect or be affected by the conduct of a sponsored projects

**Yale University Faculty Handbook**

<http://www.yale.edu/provost/html/policies.html>

**Yale University Policy on Conflict of Interest and Conflict of Commitment**

<http://www.yale.edu/provost/html/coi.html>

### **1.8 Outside Interests and Employment**

The University encourages its faculty to participate in activities that benefit not only the individual faculty member, but also the University and society. However, no outside interest will be permitted to compromise the integrity of teaching, research and scholarship at Yale nor will such interests be permitted if they detract from fulfillment of essential obligations to the University. Faculty ownership or management of private enterprise requires disclosure to the Provost's office.

[Yale University Faculty Handbook  
http://www.yale.edu/provost/html/policies.html](http://www.yale.edu/provost/html/policies.html)

### **1.9 Use of Yale Name**

The University does not permit the use of its name in advertising or promotional material related to the results of sponsored projects without the prior written approval of an officer of the University. In addition, the University will neither guarantee nor warrant the results of sponsored projects

### **1.10 Openness in Research**

The University does not conduct or permit its faculty to conduct secret or classified research.

[Yale University Faculty Handbook  
http://www.yale.edu/provost/html/policies.html](http://www.yale.edu/provost/html/policies.html)

### **1.11 Publication Rights**

The University requires that investigators be able to publish the results of their research without prior approval of a sponsor. Agreements may, however, permit sponsors a brief period to review proposed publications and presentations. Generally no longer than 90 days in total will be permitted to allow for such protection. Delays in publication of greater than 90 days will be permitted only in instances when it is necessary to protect public health and safety, such as in the case of multi-center clinical trials.

[Yale University Faculty Handbook  
http://www.yale.edu/provost/html/policies.html](http://www.yale.edu/provost/html/policies.html)

### **1.12 Earmarking**

The University does not seek funds through earmarking, nor does it permit its faculty to do so.

[Yale University Faculty Handbook  
http://www.yale.edu/provost/html/policies.html](http://www.yale.edu/provost/html/policies.html)

### **1.13 Patents, Licensing and Copyrights**

The Office of Cooperative Research (OCR) provides oversight for patenting and licensing activities, university inventions, and contractual relationships between faculty and industry. OCR staff work with Yale researchers to identify inventions that may ultimately become commercial products and services useful to the public. An important goal for the Yale OCR is to identify new ideas, cultivate venture funding for them, and facilitate their development into companies that become part of the New Haven economy.

The University takes title to all patents and certain copyrighted material that result from the research activities of faculty, staff and students. Faculty are required at the time of hire to sign a Patent Policy Acknowledgement & Agreement form. An Invention Disclosure form is required when the individual has an invention.

**Yale University Faculty Handbook**

<http://www.yale.edu/provost/html/policies.html>

**Yale University Patent Policy Acknowledgement & Agreement**

[http://www.yale.edu/ocr/pfg/sample/ppaa\\_form.html](http://www.yale.edu/ocr/pfg/sample/ppaa_form.html)

**OCR Home Page**

<http://www.yale.edu/ocr/>

**OCR Invention Disclosure Form**

<http://www.yale.edu/ocr/disclose.html>

**OCR Invention Policies**

[http://www.yale.edu/ocr/pfg/documents/ConsultingGuidance\\_000.pdf](http://www.yale.edu/ocr/pfg/documents/ConsultingGuidance_000.pdf)

## Chapter 2:

### General Guidance on the Administration of Sponsored Projects

#### 2.1 What is a Sponsored Project?

Sponsored projects are established when funds are awarded to the University by external sources in support of research, instruction, training, service, or other scholarly activities under an agreement where one of the following conditions applies:

- The award instrument requires endorsement (i.e., a formal signature or other method of acceptance), and binds the University to a set of terms and conditions.
- The agreement obligates the PI/PD to a line of scholarly or scientific inquiry that typically follows a plan, provides for orderly testing or evaluation, or seeks to meet stated performance goals.
- The agreement establishes an understanding of how funds will be used or includes a line item budget that identifies expenses by activity, function, or project period.
- The agreement requires fiscal accountability as evidenced by the submission of financial reports to the sponsor, an audit provision, or the return of unexpended funds at the conclusion of the project.
- The agreement obligates the PI/PD to report project results or convey rights to tangible or intangible properties resulting from the project. Examples of tangible properties include equipment, records, technical reports, theses, or dissertations. Intangible properties include rights in data, copyrights or inventions.
- The agreement requires considerations such as indemnification or imposes other terms of legal accountability.
- The agreement prohibits or inhibits the University the PI/PD from carrying out any activities normal to an academic setting

#### 2.2 Gifts

A gift is any item of value given to the University by a donor who expects nothing significant of value in return other than recognition and disposition of the gift in accordance with the donor's wishes. Although a donor may place some restrictions on the use or disposition of a gift and may require a report that demonstrates that the donor's wishes have been met, these terms do not make the gift a sponsored award. Such "restricted gifts" essentially create a fiduciary responsibility in which the University, by accepting the gift, is obligated to carry out the wishes of the donor.

#### **Policy 2200: Gifts to the University**

<http://www.yale.edu/ppdev/policy/2200/2200.pdf>

#### **Procedure 1306 PR. 02: Distinguishing Between a Gift and a Sponsored Award**

<http://www.yale.edu/ppdev/Procedures/ga/SponsoredProjectGiftorGrant/1304PR.02/GiftorGrant.pdf>

#### 2.3 Who Can Submit a Proposal for Externally Sponsored Activity?

PI/PD's assume the primary leadership role in externally sponsored activity. In order to ensure that research is conducted by those who have the requisite training and skill as well as the appropriate relationship to Yale, the University will normally sponsor proposals only when a PI/PD is employed full-time by the University and holds an appointment as assistant professor, associate professor, professor, research scientist/scholar, or senior research scientist/scholar. Exceptions require the approval of the Provost, or, where appropriate, the dean of the relevant professional school.

## **Yale University Faculty Handbook**

<http://www.yale.edu/provost/html/policies.html>

### **Policy 1310: Principal Investigator Eligibility requirements on Sponsored Projects**

<http://www.yale.edu/ppdev/policy/1310/1310.pdf>

## **2.4 Other Personnel Involved in the Conduct of Research**

All faculty ranks are described in the Faculty Handbook. Appointments for faculty, regardless of category and including research faculty such as Associate Research Scientists, Research Scientists and Senior Research Scientists, and Lecturers and Instructors, are handled through the Faculty Affairs Office or Dean's Office in a self support school. PIs/PD's should in all cases consult with the relevant Chair or Dean before proceeding with any appointment discussions.

### **Faculty Handbook**

<http://www.yale.edu/provost/handbook/yfhtoc.html>

### **Personnel Policies and Practices Manual**

<http://www.yale.edu/ppdev/PersPracWeb/TOC.html>

[http://www.yale.edu/fas/html/aps\\_memos.html](http://www.yale.edu/fas/html/aps_memos.html)

PIs/PD's should consult with their business managers and with the offices responsible for the different categories of personnel discussed below before taking any personnel-related actions.

### **2.4.1 Visiting Research Faculty**

This category is reserved for persons affiliated with other institutions whose participation for limited periods in sponsored research administered by Yale will be of mutual benefit.

### **Faculty Handbook**

<http://www.yale.edu/provost/handbook/yfhtoc.html>

### **2.4.2 Postdoctoral Appointees**

There are two categories of postdoctoral appointees: Postdoctoral Fellows and Postdoctoral Associates. In most cases the difference arises because of the funding source. Appointees funded from Yale-administered research grants or contracts in order to provide essential services related to the supported research are classified as Postdoctoral Associates; they are employees of the University.

Postdoctoral Fellows are not Yale employees. They may be funded either from training grants to the University or directly from an outside source. Appointees funded from University sources that are neither research nor training grants may be classified either as Postdoctoral Associates or Postdoctoral Fellows, but they must be classified as Postdoctoral Associates if they are required to perform services for the University. Contact the Postdoctoral Office for the current recommended minimum salaries and the recommended salary increases for post docs with salaries above the minimum.

### **Postdoctoral Policies**

<http://www.yale.edu/provost/html/postdocpolicy.html>

### **2.4.3 Visiting Fellows**

This title is given to established scholars and other distinguished individuals--faculty on leave from other institutions, government officials, journalists, writers, and the like--whose associations with the University and residence in the community for a limited period will be of mutual benefit. No teaching or work for the University is required. Visiting fellows are neither members of the faculty, nor Yale employees. They receive no compensation from the University. These appointments are processed through the

Department or School to the Postdoctoral Office. Details are available in the Administrators Guide on the Postdoctoral Office Website

**Faculty Handbook**

[http://www.yale.edu/provost/handbook/handbook\\_v1\\_visiting\\_appointments\\_univ.html#T2](http://www.yale.edu/provost/handbook/handbook_v1_visiting_appointments_univ.html#T2)

**Administrators Guide on the Postdoctoral Office Website**

<http://www.yale.edu/postdocs/>

#### **2.4.4 Research Affiliates**

The appointment of a research affiliate is given to individuals who hold the Ph.D. or have equivalent training and are engaged in scholarly or scientific research in association with a faculty member or as a member of a research group. Only academic departments, programs and units with the authority to make academic appointments may appoint Research Affiliates. These appointments are initiated by the department or school and processed by the Postdoctoral Office.

**Faculty Handbook**

[http://www.yale.edu/provost/handbook/handbook\\_v\\_research\\_appointments\\_unive.html#T6](http://www.yale.edu/provost/handbook/handbook_v_research_appointments_unive.html#T6).

**Administrators Guide on the Postdoctoral Office Website**

<http://www.yale.edu/postdocs/>

#### **2.4.5 Foreign Scholars**

The hiring of non-US citizens who are not permanent residents is subject to federal regulation. Only persons holding certain visas may be eligible for employment or to receive payment even of honoraria or expenses. The University provides assistance to departments that wish to hire or host scholars from abroad. The Office of International Students and Scholars (OISS) is the University's representative, for all immigration matters to the Immigration and Naturalization Services (INS), as well as to any other government agencies involved in bringing foreign nationals to Yale University (e.g., Departments of State and Labor.) PIs/PDs should consult with OISS for assistance in hiring or hosting foreign scholars.

**The Office of International Students and Scholars**

<http://www.oiss.yale.edu/department/oissrole.htm>

#### **2.4.6 Managerial and Professional Staff**

Hiring of managerial and professional staff is handled through Human Resources (HR). They maintain descriptions of the requirements for each type of position and the salary ranges which may be offered for Managerial and Professional personnel. PIs/PD's should work with their business managers regarding M&P staff.

#### **2.4.7 Clerical and Technical Staff**

Hiring of clerical and technical staff is handled through HR. HR maintains descriptions of the requirements for each type of position and the salary ranges which may be offered for Clerical & Technical personnel. PIs/PD's should work with their business managers regarding C&T staff.

#### **2.4.8 Temporary Replacement Personnel**

If a replacement must be found for a permanent C&T employee who is on short term leave (such as a maternity, medical or personal leave) consult HR about the personnel who may be available from the Interim Employment Pool (785-3839). PIs/PDs should work with their business managers regarding temporary replacement personnel.

## **2.5 Administrative Offices in Support of Research**

Sponsored projects administration is a joint effort between the University administrative offices, the Deans and Chairs and the PI/PD.

### **2.5.1 Corporate Responsibilities**

Extramurally sponsored projects are made to the University in its corporate name, Yale University. Therefore, awards of funds for sponsored projects are awards to the University and commitments under agreements are commitments of the University. Any work performed by a faculty member of the University under such a project must be considered as work performed for the University.

## **2.6 Roles and Responsibilities**

As published in the Yale University Standards of Business Conduct, faculty and staff "should exercise responsibility appropriate to their positions and roles. They are accountable to each other, to the University, and to themselves for their actions and their decisions not to act. When roles or responsibilities are unclear, they should take it upon themselves to obtain clarity. They should exercise sound business judgment in the performance of their responsibilities, to the best of their ability."

### **2.6.1 Principal Investigators/Program Directors (PI/PD)**

Sponsored projects administration is a joint effort between the PI/PD and the University. The PIs/PDs are responsible for the overall scientific and technical quality of individual projects conducted under their auspices as well as complying with the financial and administrative policies and regulations associated with the award. While the University is held legally and financially responsible and accountable to sponsors for the performance of the activity funded and the proper use of funds, this task cannot be accomplished without the full cooperation and oversight of the PI/PD

PIs/PDs should ensure the accuracy of information provided in an application, for the scientific and intellectual direction of their project if awarded, and for the submission in a timely manner of all required technical, progress, invention and financial reports.

PI/PDs may have administrative staff to assist them with the management of project funds, the ultimate responsibility for the management of the sponsored research project work and funds, however, rests with the PI/PD. In order to carry out their responsibilities effectively, PIs/PDs should meet with their business offices to review their research portfolio in a timely manner.

The fundamental responsibilities of the PI/PD during the post-award phase of a sponsored research project include executing the project as outlined in the funded proposal, using sound management techniques, authorizing only those expenditures that are reasonable and necessary to accomplish the project goals and are consistent with the sponsor's terms and conditions, spending no more than the amount authorized by the sponsor for the project period, carrying out the project's financial plan as presented in the funded proposal, or make changes to the plan following a prescribed set of policies and procedures, reporting project progress to the sponsor as outlined in the terms of award, reviewing expenditures in a timely fashion to assure their appropriateness and correctness, complying with all Yale University policies and procedures related to project management and personnel practices, complying with all applicable sponsor rules, regulations and/or terms and conditions of the award.

**The Responsible Conduct of Science**  
<http://www.yale.edu/grants/policies/rcr.html>

### **2.6.2 Deans and Chairs**

Department chairs have a general responsibility for promoting the scholarly and research activities of their departments, as well as fostering sound stewardship of funds. They review applications for research projects for appropriateness assuring that the personnel, fiscal, and space demands of all such projects are in the best interests of both their department and the University as a whole. School deans have the same responsibilities for their schools.

### **2.6.3 The Business Office**

At the time of proposal preparation business managers or department administrators are responsible for assisting in the preparation of budgets, providing accurate estimates for salary and other budget items, preparing current and pending support information, verifying availability of space and other resources to conduct the work, verifying with the PI/PD that the proposed scope of work can be completed given the proposed funding levels, coordinating with other business offices to obtain verification and approval for non-departmental personnel involved on a project, coordinating documentation for subcontracts and/or consultants, and assisting the PI/PD in complying with any relevant special reviews

Post Award Departmental or School business administrators (BA) are responsible for the administrative aspects of a sponsored project and are key individuals in the management of a sponsored project. While the University places the prime responsibility for the conduct of the sponsored projects in all its aspects on the PI/PD, it is the business administrator who may be the most involved in the day-to-day administrative operations of the project. While the PI/PD may delegate some responsibility for the management of finances or other tasks to departmental and school business staff, the PI/PD remains accountable for compliance with University policy and sponsor requirements.

#### **Business Operations**

[http://www.yale.edu/fa/services.html#business\\_ops](http://www.yale.edu/fa/services.html#business_ops)

#### **YSM Accountability Statement**

<http://info.med.yale.edu/finops/forms/accountabilitystatement.doc>

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

ORA was created in July 2006 to provide more focused responsibility for the University's systems and processes regarding research administration, accounting, and improved compliance programs.

#### **ORA**

<http://www.yale.edu/researchadministration/>

### **2.6.5 Grant and Contract Administration (GCA)**

GCA is charged with performing the following functions:

- Outreach for funding opportunities
- Reviewing proposals for compliance with University and sponsor requirements
- Alerting PI/PDs and/or departments to potential problems with the funding source (i.e., onerous reporting requirements, problematic intellectual property policies, etc.)
- Ensuring that information provided related to any required assurances is accurate and complete (i.e., use of human subjects or animals, lobbying, COI etc.)
- Obtaining approval for any unusual sponsor requirements such as waiver of indirect costs, restrictions on dissemination of results, restrictions on publication etc.
- Verifying cost-share commitments and/or matching funds
- Verifying documentation for subcontractors and/or consultants
- Reviewing proposal routing form for appropriate signatures and PI/PD compliance with relevant special reviews

**The Office of Grant and Contract Administration (GCA)**  
<http://www.yale.edu/grants/>

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

The primary responsibilities of GCFA during the post-award phase of a sponsored research project include:

- Facilitating good project management techniques by disseminating information to PI/PDs on a wide range of topics related to the financial management of sponsored projects.
- Providing post-award financial administration support to departments including monitoring of accounts.
- Financial reporting to sponsors.
- Receivables, billings and collections. GCFA manages the collection of grant funds and Letter-of-Credit (LOC) draw down of funds
- Follow up with sponsors on outstanding payments as required by the terms of agreements.
- Overseeing the administration of the effort reporting function, including the Effort Reporting System.
- Coordinating government, private sponsor and public accounting firm audits.
- Developing and negotiating federal Facilities and Administrative and fringe benefit rate agreements.
- Conducting space function and departmental administration surveys.
- Administering government property accounting inventory.
- Maintaining the inventory system for moveable equipment.
- Reviewing rate setting calculations for Internal Service Providers.

**Grant and Contract Financial Administration**  
<http://www.yale.edu/grants/>

## Chapter 3

### Required Assurances for Proposal Submission

While preparing a proposal, it is important to keep in mind that certain special reviews and approvals may be necessary to ensure compliance with University and sponsor requirements. The review and approval procedures listed below are mandated by federal statute and/or regulations. Violations can lead to loss of federal and nonfederal support. University policy requires these reviews for all projects, sponsored or non-sponsored.

### 3.1 Human Subjects Research

Yale investigators conducting human subject's research, whether or not funded by a federal sponsor, must submit a proposal research plan to the appropriate Yale Institutional review Board (IRB) for review.

See Section 1.3 for Training Requirements

#### Yale University Faculty Handbook

<http://www.yale.edu/provost/html/policies.html>

#### Human Investigation Committee (HIC)

<http://info.med.yale.edu/hic/>

<http://cme.nci.nih.gov/>

#### Protocol Specific Conflict of Interest Disclosure

<http://info.med.yale.edu/hic/forms/index.html>

### 3.1.1 HIPAA Privacy and Security

HIPAA (the Health Insurance Portability and Accountability Act) requires the standardization of electronic patient health, administrative and financial data. It also establishes security and privacy standards for the use and disclosure of "protected health information" (PHI).

PHI is defined as individually identifiable health information that is created or received by a HIPAA covered entity. The covered components at Yale University are the School of Medicine, the School of Nursing, and the clinics of the Department of Psychology. Health information includes any information, whether oral or recorded in any form, that relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment of health care to an individual.

The HIPAA Privacy Rule:

- Establishes conditions under which PHI can be used within a covered entity and disclosed to others outside it including other units within the University.
- Grants individuals certain rights regarding their PHI;
- Requires the privacy and security of PHI.
- Contains particular requirements relating to research use and disclosure of PHI.

#### HIPPA

<http://info.med.yale.edu/hic/hipaa/>, <http://hipaa.yale.edu/>.

<http://hipaa.yale.edu/security/>

### 3.1.2 Protocol-Specific Conflict of Interest

In addition to the annual conflict of interest/commitment disclosure form (see Section 1.7), investigators conducting research involving human subjects are required to submit

to the cognizant Yale Institutional Review Board a protocol-specific conflict of interest disclosure (related links and resources are listed below). These disclosures are intended to supplement, not replace, the annual disclosure described above.

**Human Investigation Committee (School of Medicine)**

**HIC Forms**

<http://info.med.yale.edu/hic/forms/index.html>

**3.2 Animal Care and Use**

Yale investigators conducting protocols involving animal care and use, whether or not funded by a federal sponsor, must submit an application to the IACUC as well as a copy of the sponsor's proposal to the appropriate Institutional Animal Care and Use Committee (IACUC) for review. Protocol applications may be downloaded from the web.

Principal Investigators are responsible for assuring that there is an approved protocol on file with the IACUC Office for any work involving the use of animals, and in the case of externally funded research, that the approved protocol is linked (congruent) with a specific proposal or sponsored project.

The IACUC will provide the PI with 90d, 60d and 30d notices of pending expiration. At the time of expiration an Expiration Notice will be sent to the PI, department business manager, the Executive Director of GCA, Regulatory & Safety Services, and the Yale Animal Resource Center (YARC) advising them of the expiration date, and informing PIs that no further animals may be ordered and that all research/and or breeding of animals must be stopped for that expired protocol and that no charges can be made against the sponsored project to which it is linked. The Yale Animal Resource Center (YARC) will follow established procedures that prevent ordering of animals within two weeks of the expiration of a protocol.

**Yale University Faculty Handbook**

<http://www.yale.edu/provost/html/policies.html>

**Institutional Animal Care and Use Committee**

<http://info.med.yale.edu/iacuc/research/>

**Grant and Contract Administration Standard Operating Procedure # 0801: Handling Sponsored Projects on the Expiration of Linked Approved Animal Care and Use Protocols Grant and Contract Administration Standard Operating Procedure # 0802: Procedures for Handling Sponsored Projects When the Project Involves the Use of Animals**

**3.3 Environmental Health and Safety**

Any investigator planning to use radioactive materials, hazardous chemicals, potential hazardous biological materials and controlled substances, as well as for other aspects of research relating to occupational and environmental safety must consult with the Office of Environmental Health and Safety (OEHS)

OEHS also provides training for faculty, staff, and students on safe handling and disposal of all kinds of waste that the University generates in its research and academic activities. New PIs/PDs should contact OEHS to discuss safety issues at Yale, required certifications, and training. PIs/PDs must ensure that the personnel involved in their research have received all required safety training and are aware of all relevant policies and procedures. OEHS offers training classes.

**Yale University Faculty Handbook**

<http://www.yale.edu/provost/html/policies.html>

## **The Office of Environmental Health and Safety**

<http://www.yale.edu/ehs/policy.htm>

<http://www.yale.edu/ehs/training.htm>

### **3.4 Biological Safety**

Biological safety issues are addressed and managed by the OEHS and the Yale Biological Safety Committee. PIs/PDs have specific responsibilities relating to work with biological materials.

All PIs/PDs who work with, or who anticipate working with, biological materials (e.g., microorganisms, cell lines, human materials, animals, and toxins) are required to complete and submit a "[Form 01 Registration for the Use of Biological Materials](#)" to OEHS. Registration ensures that PIs/PDs comply with applicable NIH, CDC, State of Connecticut, and institutional requirements, and also helps ensure that staff are properly trained and prepared to work with these potentially hazardous materials. PIs/PDs must update the Form 01 annually or more often if a PI/PD's work changes. The form, along with copies of the University's bloodborne pathogens and biological safety manuals, can be obtained from the OEHS office, by fax, or from the OEHS website.

The Yale Biological Safety Committee provides policy oversight on biological safety issues, including reviewing and approving research protocols involving recombinant DNA (rDNA) and various infectious materials.

#### **OEHS Website**

<http://www.yale.edu/ehs/>

#### **The Biological Safety Manual**

<http://www.yale.edu/ehs/Documents/Bio/Biosafety%20Manual.pdf>

#### **PI Responsibilities for Biological Safety**

<http://www.yale.edu/ehs/bioreqI.htm>

#### **rDNA experiments and regulatory requirements**

<http://www.yale.edu/ehs/bioreqIII.htm>

#### **The National Institutes of Health on rDNA experiments**

<http://oba.od.nih.gov/rdna/rdna.html>

### **3.5 Radiation Safety**

The Radiation Safety Committee establishes Yale policies and procedures governing the use of all types of radioactive materials at Yale and carries out the duties related to the University's Nuclear Regulatory Commission licenses.

The Radiation Safety Section of OEHS, under the direction of the University's Radiation Safety Committee, ensures compliance with federal and state regulations and Yale policies relating to the safe receipt, handling, use, and storage of radioactive materials at Yale.

PIs/PDs must receive authorization from the Radiation Safety Committee before conducting any experiments involving radioactive materials. The Radiation Safety Section's Radiation Safety Procedures Manual explains the responsibilities of PIs/PDs and individual users of radioactive materials. New personnel and individuals with no previous experience working with radioactive materials must complete radiation safety training. All persons frequenting labs with radioactive material or radiation sources must complete the radiation safety training as well.

#### **Radiation Safety Training**

<http://www.yale.edu/ehs/rad.htm>

### **3.6 Chemical Safety**

Chemical and Physical Safety is responsible for control of health hazards related to chemical and physical agents within the University. In addition to providing training, Chemical and Physical Safety conducts inspections of all University laboratories handling or storing hazardous chemicals. These inspections evaluate:

- employee exposures (qualitative assessments)
- the status of critical control equipment (hoods)
- chemical storage practices
- employee use of personnel protective equipment
- employee work practices
- compliance with Federal/State regulation and University policies.

Every University laboratory is inspected at least annually. A more frequent inspection schedule is established for laboratories working with higher risk materials.

#### **OEHS**

<http://www.yale.edu/ehs/chem.htm>

### **3.7 Select Agents**

Select Agents are certain defined materials that have been identified by the U.S. Government as agents that have potential use in biological terrorism or warfare. In order to possess, use, send, or receive Select Agents, the University and each individual within the University who will have access to the Select Agent(s) must first satisfy certain federal requirements and receive appropriate training. Federal approval must be obtained on each required element before possession, use, or transfer of Select Agents. PIs/PDs who anticipate working with Select Agents are encouraged to contact OEHS as soon as possible in order to begin the approval process.

#### **Select Agents**

<http://www.yale.edu/ehs/bio.htm#>

### **3.8 Controlled Substances**

The use of controlled substances (Schedule I - V drugs) in research laboratory operations (including research animals) is subject to extensive state and federal regulatory requirements. These requirements are separate from and in addition to any that apply to clinical prescriptions and patient dispensing. Under controlled substances regulations, PI/PDs must obtain research laboratory licensure from the State of Connecticut Drug Control Division (DCD) as well as registration from the federal Drug Enforcement Administration (except for chorionic gonadotropin, which is currently only regulated by the state DCD).

#### **Application Processing and Procedures**

<http://www.yale.edu/ehs/consub.htm>

### **3.9 Purchasing/Shipping Hazardous Materials and Other Restricted Items**

University policy requires approval before ordering or purchasing certain equipment, hazardous materials, and radioactive material.

Anyone shipping, receiving, packaging, handling, or transporting hazardous materials must receive training in the general requirements of handling hazardous materials as well as function-specific training for specific task(s) to be performed. Yale requires training every two years for anyone shipping biological agents and before receiving or sending infectious substances, toxins, or genetically modified organisms.

#### **Transportation and Transfer of Biological Agents Training Guide**

<http://www.yale.edu/ehs/hazmatship.htm>

#### **University Policy on Purchase of Restricted Items**

<http://www.yale.edu/ppdev/policy/3220/3220.pdf>

### **3.10 Emergency Response**

In the event of an emergency, emergency responders are available from the Office of Environmental Health and Safety when a spill or accident occurs.

#### **Emergency Response Procedure**

<http://www.yale.edu/ehs/emergency.htm>

### **3.11 Policy for the Review of Human Embryonic Stem Cell Research (hESC)**

All Yale University individuals, including faculty, staff, postdoctoral scholars, students, visiting scholars and other researchers who plan to engage in hESC Research are required to receive training regarding the ethical considerations and the policies and regulations pertaining to hESC research before beginning work on any project involving hESCs.

It is necessary for Yale University officials to know at all times what hESC research has been proposed by and is being conducted by Yale investigators and/or at Yale University. Investigators who are using or plan to use hESCs are required to provide the following detailed information to the University's Embryonic Stem Cell Research Committee (ESCRO) on the designated tracking form, for all hESC research, regardless of the source of funding:

- Sources of the hESCs, including the original sources of derived cell lines,
- Sources of funding for the research work, and
- Locations, on or off campus, at which the work will be or is being performed.

The Stem Cell Research Resource Allocation Committee (SCRRAP) has developed detailed procedures specifying how investigators will submit to the SCRRAP Committee proposed protocols for allocating effort, equipment, supplies, and facilities to hESC research on Non-registered Lines to meet federal guidelines.

Faculty investigators will be expected to participate in periodic reviews by the Yale University Audit Department to assure that all applicable regulations are being followed, and to evaluate the effectiveness of Yale policies and procedures related to the conduct of hESC Research.

#### **ESCRO Policy**

<http://www.yale.edu/provost/html/escropolicy.html>

### **3.12 Export Controls**

Yale faculty and staff should be aware of export control regulations that govern the distribution to foreign nationals and foreign countries of strategically important technology, services and information, including equipment and technology used in research and be able to apply to their own research activities.

It is important for PIs/PDs to recognize that federal regulations may apply to the physical export of equipment and technology used in the course of research. In addition, transfer of technology and/or certain use of controlled technologies by foreign nationals in the United States (deemed exports) may also be subject to federal regulations. There are three primary sets of federal regulations that govern export controls, covering virtually all fields of science, technology, and engineering.

- The Export Administration Regulations (EAR) administered by the Department of Commerce, apply to the export of "dual-use" items and their technology (i.e., items that have both commercial and military applications, such as computers, microelectronics, or pathogens)

- the International Traffic in Arms Regulations (ITAR), administered by the Department of State, apply to munitions, or defense articles and defense services (i.e., those articles and services that are specifically designed for military applications or defense and do not have predominantly civil applications)
- The Treasury Department's Office of Foreign Assets Control (OFAC) governs trade embargoes, sanctions, and travel restrictions and restricts exportation of information and research articles to embargoed entities and persons.

In many cases, university activities are exempt from export regulation; in some cases, the University may be required to obtain prior approval from the appropriate agency before a PI/PD will be permitted to transfer materials overseas, allow foreign nationals to access certain equipment, collaborate with a foreign company or research organization, hire a foreign consultant, or share research results with foreign nationals.

**Guidelines on Export Controls**

[http://ogc.yale.edu/legal\\_reference/export\\_controls.html](http://ogc.yale.edu/legal_reference/export_controls.html)

**3.13 Minors in Labs**

There are statutory restrictions on the employment of students and others under the age of eighteen (18). There are also restrictions on activities permitted for minors in laboratories. Individuals under the age of 18 must meet certain requirements and obtain certain approvals in order to enter a Yale laboratory.

**Minors in Laboratories**

[http://www.yale.edu/provost/html/minors\\_lab.html](http://www.yale.edu/provost/html/minors_lab.html).

## Chapter 4

### Sources of Project Support

The Office of Grant and Contract Administration (GCA) maintains a collection of print and electronic resources to assist in identifying potential sponsors.

#### [Funding Information and Deadlines](http://www.yale.edu/grants/funding_info/)

[http://www.yale.edu/grants/funding\\_info/](http://www.yale.edu/grants/funding_info/)

### 4.1 University Support

#### 4.1.1 Limited Submissions and Internal Competitions

Some sponsors limit the number of nominations or proposals that Yale may submit to a particular program. Institutional procedures have been developed for selecting candidates for such awards, and announcements soliciting internal proposals are distributed by GCA. An internal selection committee with expertise in the area reviews the proposals and selects those that most closely match the sponsor's and Yale's interests and have the best opportunity for success. Two programs administered by GCA.

Most competitions are open to applicants from departments throughout Yale University. A few competitions are limited by the sponsors to physicians or to researchers in specific areas of medicine. To facilitate selection of the best candidates, the School holds an internal competition for each of the 38+ Scholar Awards. The **Scholar Awards** and the **Funds & Fellowships** Committees review internal applications and select Yale's nominees for external competitions from the University community. Nominees are asked to prepare a final proposal which is submitted to the sponsoring agency after formal review by GCA.

The **Brown-Coxe Fellowships** support new postdoctoral fellows conducting research at the Yale University School of Medicine. Candidates must have received their MD, PhD, or other doctoral degree by the award date and Investigators cannot have completed more than two years of postdoctoral research as of the date of the specified award.

#### [Funding Opportunities and Deadlines](http://www.yale.edu/grants/funding_info/)

[http://www.yale.edu/grants/funding\\_info/](http://www.yale.edu/grants/funding_info/)

#### 4.1.2 Federal

[Grants.gov](http://www.Grants.gov) has been established as a governmental resource of funding as part of the Government's Fiscal Year Management Agenda to improve services to the public. Grants.gov allows applicants for federal Grants, from the NIH and certain other Federal agencies, to search and apply for funding through a common web site. The [Find Grant Opportunities](#) provides the ability to search for Federal government-wide grant opportunities and to receive notification of future grant opportunities. The [Apply for Grants](#) feature allows organizations to apply for Federal grants online through a unified process.

The National Science Foundation (NSF) has a similar mechanism for finding and applying for grants.

#### [Getting Started with Grants.gov at Yale](http://www.yale.edu/grants/grantsdotgov/)

<http://www.yale.edu/grants/grantsdotgov/>

<http://www.nsf.gov/>

#### **4.1.3 Not-For-Profit Sponsors**

A broad variety of private organizations including foundations and associations provide funding for research and training activities of interest to University faculty. Many organizations which support research have their own web sites, a number of which are listed and linked through two international databases, the Community of Science (COS) and IRIS that can be found on the GCA website.

The Corporate and Foundation Relations Office within the Office of Development will be kept informed by GCA of all corporate and foundation activities processed through its office in support of more general University fund raising efforts.

#### **Funding Opportunities**

[http://www.yale.edu/grants/funding\\_info/index.html](http://www.yale.edu/grants/funding_info/index.html)

[Memorandum from the Committee on Cooperative Research and the Royalty Sharing Task Force \(11/29/2000\)](#)

Internal Document

#### **4.1.4 Commercial Sponsors**

The University encourages interactions between faculty researchers and their counterparts in industry. However, there are inherent conflicts built into these relationships that require attention.

In these relationships the University will look to ensure the freedom of dissemination of the results of its research, ownership of intellectual property including patents, conflicts of interest, freedom of choice in the selection of research topics and in the conduct of the research, and relevance to the educational mission of the University.

Commercial relationships require a formal proposal including a budget that has been reviewed and approved by the appropriate department Chair, Dean and GCA, compliance with applicable policies for the protection human subjects, animal welfare, and compliance with radiation safety standards and conflict of interest disclaimers.

Proposals for corporate support should provide for full recovery of costs including F&A costs (formerly indirect costs) at the full federally approved uncapped research rate unless conducted as a clinical trial. Terms and conditions of industry Sponsored Research Agreements (SRA) without licensing of existing intellectual property are negotiated by GCA. SRA's involving the licensing of existing intellectual property are jointly negotiated with GCA and OCR.

GCA has developed preferred contracting language for research agreements between Yale University and industrial sponsors. While PI/PD's should be familiar with the policies of the University, it is the responsibility of GCA to negotiate terms and conditions.

The University conducts research programs using reasonable efforts, consistent with good scientific practices. Research results are not warranted or guaranteed.

PI/PD's must be free to publish the results of their research without prior approval of a sponsor or third party. Sponsors will be permitted a short period to review publications prior to submission in order to identify and request the removal of sponsor confidential information or to identify intellectual property requiring protection. A short publication delay, generally no longer than 90 days in total, will be permitted to allow for such protection. Delays in publication of greater than 90 days will be permitted only in instances when it is necessary to protect public health and safety, such as in the case of multi-center clinical trials.

#### **4.1.5 Industry Supported Clinical Trials**

These are agreements between the University and various institutions in which the University agrees to test or monitor drugs, procedures, techniques, or devices that might be used for the care of patients. Considerations listed in the general outline of industrial agreements should be followed.

The University and sponsor liability/indemnification clauses should be part of a clinical trial agreement in order to address who bears the costs in the event of legal action by a third party. In addition to indemnification, the sponsor is normally expected to pay for any injuries to subjects that are the direct result of the study.

It is the policy of the University to maintain the confidentiality of patient medical records. The terms of a clinical trial agreement typically make a distinction between research records, study records and patient records, the latter being strictly confidential.

Inventions or discoveries made in the course of clinical trials that are directly related to the sponsor's study drug or device will normally belong to the sponsor.

#### **HIPAA**

<http://hipaa.yale.edu/>

**Grant and Contract Guide for the Negotiation of Clinical Trials**

[Internal to GCA](#)

#### **4.1.6 Startup-Sponsored Agreements**

These are agreements to perform research at Yale that are financed by small, privately owned businesses ("startups"). In some cases, Yale faculty may have a financial interest or board seat or the company may be based on a license of Yale IP executed through the Office of Cooperative Research. These agreements may also include Small Business Innovation Research (SBIR) or The Small Business Technology Transfer (STTR) research subcontracts or agreements in direct support of research at Yale. Important considerations include whether any and all conflict of interest disclosures have been made, whether any actual or potential conflicts have been appropriately managed or eliminated, whether any students will be engaged in performing the research (if so, this should be disclosed to the COI Committee), and whether it is clear that Yale space and resources are to be used for Yale purposes only.

**Policy Recommendation Relating to Faculty Involvement in Certain Commercial Ventures**

[Internal Document](#)

## Chapter 5

### Proposal Development

All research agreements must be evidenced by a formal written document that outlines the research objectives and administrative requirements of the project. Informal (oral) agreements are the personal responsibility of the individual faculty member making such arrangements and may not be binding on the University.

The submission of a proposal to a potential sponsor for support of research or other scholarly activity is the responsibility of the PI/PD.

The following Sponsored Projects Policies are of direct relevance to the **preparation** of sponsored projects proposals:

<a href="#">1306 Policy</a>	<a href="#">Cost Sharing on Sponsored Projects</a>
<a href="#">1316 Policy</a>	<a href="#">Effort Commitment</a>
<a href="#">1403 Policy</a>	<a href="#">Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds</a>
<a href="#">1405 Policy</a>	<a href="#">Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects</a>
<a href="#">3220 Policy</a>	<a href="#">University Policy on Restricted Items</a>

### 5.1 Types of Proposals

- **Preliminary proposals** also known as pre-proposals, white papers, or letters of intent, may be requested by a sponsor to ascertain interest in a project. Like full proposals, preliminary proposals should be submitted through GCA.
- **New proposals** are submitted for initial funding of a project. Most new proposals are submitted for competitive review by the sponsor and peer review and may be announced through an **RFP (Request for Proposal)**, **RFQ (Request for Quotation)** or an **RFA (Requests for Application)**. Proposals submitted in response to these specific work statements may contain specific terms and conditions and formatting requirements.
- **Unsolicited proposals** are investigator-initiated projects submitted to a sponsor but not in response to a specific solicitation. The area of activity should be of interest to the sponsor.
- **Continuation proposals** are requests for funding which are contingent upon completion of some scope of work or deliverable. Sponsors usually request a progress report and often a budget.
- **Revision proposals** are formal requests for continuation of a project that is nearing termination or a request for an administrative supplement. Renewal proposals are subject to the same sponsor review criteria as new proposals and therefore require significant lead time.
- **Revised proposals** are submitted in response to an indication by the sponsor that a project may be fundable, but with the stipulation that specific changes in the proposal must be made. The revised proposal should carefully follow the sponsor instructions with respect to identification of changes made in response to the reviews of the original proposal.
- **Supplemental proposals** request additional support of a funded project (e.g., equipment, support of undergraduate or minority investigators, programmatic modifications).

- **Consortium/Joint Proposals and Subcontracts** are submitted for projects that will involve investigators at more than one institution. In general, one institution will be designated as the lead at the time of proposal submission. The lead institution accepts full funding and responsibility for the performance of the project from the sponsor. Sub award agreements are then issued to transfer part of the work and appropriate funds to the other participating institutions. Generally, all conditions imposed by the sponsor on the lead institution are also imposed on the subcontractor(s). All subcontracts, both to and from Yale, are negotiated by GCA. When Yale is the lead institution, GCA requires a statement from each participating organization that includes a full budget and work scope, signed by an authorized institutional official. When Yale is the subcontractor, the information (scope of work, budget, etc.) sent to the lead organization must be processed as a proposal through GCA.

## 5.2 Initial Contact with the Sponsor

A key element of successful proposal writing is establishing a relationship with the potential sponsor early on in the process. The purpose of this initial contact is to confirm the common areas of interest of the sponsor and the PI/PD. Having a contact at the funding agency can greatly facilitate writing the full proposal as well as serve as a resource for answering questions. A PI/PD may initiate contact with a sponsor to confirm research interests by a telephone call, office visit, letter of intent or a preliminary proposal. While prior approval or clearance is not needed when contacting a government agency for potential funding, all approaches to foundations and corporations should be cleared by GCA and/or the Office of Development before contact is made. Because there are multiple opportunities for smaller funding agencies to be approached by the University, a coordinated effort maximizes the University's ability to successfully compete for limited funding.

## 5.3 Proposal Preparation

The format or presentation of a particular proposal will depend on the requirements of the sponsor. Most sponsors have developed policies and procedures for the submission of proposals and may require the use of specific application forms or electronic web-based systems. Other sponsors may have less stringent format requirements. In any case, PI/PDs should obtain the most recent version of the sponsor's application guidelines and should follow the required proposal format. Guidelines or URLs should be forwarded to GCA along with application for review well in advance of the due date of the proposal to facilitate timely internal review and processing. GCA reserves the right to withdraw the application if the terms of the grantor do not meet Yale standards.

It is a good idea to start the writing process months in advance of any expected due date. Estimates of the total time devoted to producing a new application may range from two to three months or longer. Revised applications and renewals usually take less time, but are still a major effort and should not be underestimated.

## 5.4 Components of a Proposal

Most proposals, regardless of sponsor, contain the following information:

- **Title Page** includes the title and duration of the project, amount requested, PI/PD information and of the Institutional contact (in most cases, GCA).
- **Abstract or Proposal Summary** describes the objectives, methodology and significance of the proposed project. The abstract should be intelligible to someone who is not an expert in the field and should be able to stand alone.
- **Introduction** frames the problem and concisely states the importance of the research being proposed.
- **Research Plan** includes the specific aims, background and significance, preliminary studies and research design and methods.
- **Bibliography**

- **CV/Biographical Sketch** should be submitted in the format required by the sponsor
- **Use of human subjects and animals, radioactive materials, blood borne pathogens, hazardous chemicals, and recombinant DNA, and select agents.** In some cases a proposal may be submitted while these reviews by the institutional committees are pending. However, in no case will research be permitted to proceed without proper approval.
- **Budget and Budget Justification** should reflect a reasonable estimate of the expenses necessary to conduct the project.
- **Current and Pending Support** outlines awards and pending proposals for all key personnel. This includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Prizes or gifts do not need to be included. In some cases one must detail the amount of time available to carry out the proposal activities.
- **Facilities and Resources** describes equipment or other relevant resources including space, library resources, animal facilities, and core that will be available to the project.
- **Transmittal Letters** should be appended if a form asking for an institutional signature is not provided or required by the sponsor.

#### 5.5 Helpful Hints & Resources

Information is available on the GCA websites that may be helpful to PI/PDs in preparing proposals including templates for the most recent fringe benefits, graduate student tuition and indirect cost rates: [http://www.yale.edu/grants/proposal\\_dev/](http://www.yale.edu/grants/proposal_dev/)

# Chapter 6

## Budget Development

The budget in support of a sponsored project should follow a sponsor's requirements but will most often require line item detail.

### 6.1 Principles of Sponsored Project Support

The majority of externally sponsored funding at Yale is provided by the federal government. Cost accounting principles for higher education grantees are established by the federal Office of Management and Budget (OMB). The OMB circulars that are most relevant to universities include:

- [OMB Circular A-21](#): Cost Principles for Educational Institutions. This circular establishes principles for determining direct and indirect costs applicable to grants, contracts and other agreements with educational institutions.
- [OMB Circular A-110](#): Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and other Non-Profit Organizations. This circular sets forth the maximum administrative requirements that educational institutions must adhere to. Individual federal agencies are required to implement OMB Circular A-110 as individual agency regulations, such as the NIH Grants Policy Statement or the NSF Grant Policy Manual.
- [OMB Circular A-133](#): Audits of Institutions of Higher Education and Other Non-Profit Institutions. This circular establishes audit requirements and defines federal responsibilities for implementation and monitoring such requirements for institutions of higher education receiving federal awards.

OMB Circular A-21 notes that costs may be charged directly to sponsored projects if expenses meet the following criteria:

**6.1.1 Reasonableness:** The nature of the expenditure and the amount reflects an action that a prudent person would take under the circumstances.

**6.1.2 Allocability:** The expenditure provides a direct benefit to the project (i.e., the cost of a piece of equipment that is required to accomplish the work of two projects may be proportionately shared by those projects).

**6.1.3. Consistency:** Costs incurred for the same purpose in like circumstances are treated consistently as direct or indirect (F&A) costs across the institution.

**6.1.4 Allowability:** Costs conform to any limitations or exclusions as set forth in OMB Circular

Examples of unallowable costs under federal sponsorship include alcoholic beverages, entertainment costs and memberships. Costs that do not meet all of the above criteria may NOT be charged to federal grants. Non-governmental sponsors may apply different cost principles. Investigators should read the sponsor instructions carefully and consult with the GCA offices for further advice.

#### **Procedure 1305 PR.04 Unallowable Costs**

<http://www.yale.edu/ppdev/Procedures/gc/1305PR.04UnallowableCosts.pdf>

#### **Policy 1403: Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds**

<http://www.yale.edu/ppdev/policy/1403/1403.pdf>

#### **Policy 1405: Charging of F&A Types of Expenses to Non-Federal Sponsored Projects**

[Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects](#)

## 6.2 Developing a Proposal Budget

The proposal budget should delineate the entire cost of a project and accurately reflect costs that are necessary to complete the work. The budget should reflect the methodology described within the proposal narrative. Reviewers should be able to determine if sufficient funds are being requested to successfully complete the project, and that those requests are reasonable given the scope of work. Accuracy and detail are essential in this section. PIs/PDs are encouraged to follow a sponsor's guidelines exactly and provide information in the format as specified in the proposal guidelines. Departmental business office personnel and the GCA staff are available to assist investigators in developing budgets that are consistent with University policy and agency requirements.

**6.3 NIH Modular Budgets** The National Institutes of Health (NIH) has instituted a budgeting guideline for many of its applications. Under these guidelines for application under \$250,000, no detailed budgets are provided to NIH, although details on personnel and subcontracts are provided in a budget justification. Amounts requested per year cannot (currently) exceed \$250,000 in direct costs and funding must be requested in \$25,000 increments. PI/PDs should remember to budget for future year inflationary increases. A detailed budget or spreadsheet must accompany each proposal submitted to GCA for review and approval. This budget is used for internal planning and review purposes only, to verify that items have been categorized appropriately and that F&A calculations are correct.

### NIH Modular Grants

<http://grants.nih.gov/grants/funding/modular/modular.htm>

## 6.4 Major Budget Categories for Non Modular Budgets

Most other sponsors require line item budgeting. The major budget categories include:

### 6.4.1 Direct Costs

Direct costs are those costs that can be directly attributed to carrying out the work of the proposed project. Direct costs may include the following:

**6.4.1.1 Personnel Costs** should include only Yale personnel. Collaborators at other institutions should be included either as consultants or within a subcontract budget. Proposed salaries should be in accordance with approved salary scales and position grades, and the budget should reflect the actual person months or % effort that is anticipated. In developing multi-year project budgets, salary increases should be considered (consult the business office to determine the appropriate escalation factor). Some sponsors have limitations on the amount of salary that may be charged to a grant ("salary caps"). Check with the business office or GCA for current limitations.

Proposal budgets should be based on Institutional base salary. This is salary paid by Yale for work performed in accordance with their letter of appointment and excludes clinical bonuses and extra compensation. **Note:** Faculty working at the University under a Memorandum of Understanding (MOU) between Yale and the VA, do not include the salary received from the VA (as a VA employee) as part of the total compensation when calculating IBS and applicability of the salary rate cap.

### Procedure 5103 PR. 03: Salary Above NIH, SAMSHA and AHRQCap

<http://www.yale.edu/ppdev/Procedures/gc/1315PR.03SalariesaboveCap.pdf>

**6.4.1.2 Fringe Benefits** include such items as health insurance, retirement benefits, and Social Security and Medicare. Yale's fringe benefit rates are negotiated with and approved by Yale's cognizant federal agency. The rate must be charged to the grant in relationship to the salaries and percentage of effort committed to the grant.

### **Fringe Benefit Rates**

[http://www.yale.edu/grants/proposal\\_dev/#fringe](http://www.yale.edu/grants/proposal_dev/#fringe)

**6.4.1.3 Consultants** provide specific technical expertise that is not available at Yale. Consultants are not considered employees of the University and should be accounted for separately in the budget. Some sponsors limit the rate at which consultants can be paid. Consultants should be budgeted only for tasks where on-campus expertise does not exist or is not readily available. Normally, consultants are paid a fee plus travel and other expenses. Some sponsors do not permit payments to consultants and some restrict or limit such payments. If in doubt as to the allowability of or rates paid to consultants check the sponsor's program literature or contact GCA.

### **Employee vs Independent Contractor**

<http://www.yale.edu/ppdev/Guides/purchase/3210GD.01EmployeevsContractors.pdf>

### **Contracting for External Consultants and Other Professional Services**

<http://www.yale.edu/ppdev/policy/3210/3210.pdf>

**6.4.1.4 Graduate Students** should not be budgeted to include employee benefit costs unless a summer appointment is contemplated. The budget support should include the Graduate Research Assistant Salary/Stipend and Tuition charges. For graduate students supported on sponsored research grants and contracts, the proposal budget should include one-half of the tuition. The University provides the other half as a tuition subsidy. Graduate students supported by training grants, fellowship awards, or funds other than sponsored research accounts are not eligible for this subsidy. The salary/stipend item must be included in the Modified Total Direct Cost (MTDC) when calculating F&A cost in research proposals. Tuition charges should be listed under "Other Direct Costs" and are excluded from the Modified Total Direct Cost for F&A cost calculations.

### **Graduate and Professional Schools**

<http://www.yale.edu/schools/index.html>

**6.4.1.5 Equipment** needs should be itemized and justified. Most sponsors rely on the University's definition of "capital equipment" to differentiate between equipment and supply categories. Whenever possible, estimated costs should be based on catalogue prices or written quotations, copies of which should be included with the proposals.

**6.4.1.6 Materials and Supplies** includes all consumable materials including the purchase cost of animals as well as small items of equipment that do not meet the threshold for "capital equipment." Each item or group of items should be listed and carefully justified. Federal sponsors do not allow general office supplies or equipment unless their use can be specifically justified such as in the case of a large Center or multidisciplinary project.

**6.4.1.7 Travel** must be justified on the basis of its benefit to the project being proposed. Travel expenses may include trips to professional meetings, fieldwork and meetings required by sponsors. Allowable costs include meals, lodging, airfare and ground transportation. Local travel related to subject recruitment and interviews is also allowable. Some sponsors limit per diem reimbursement rates, modes of travel, foreign travel, etc. For all federally-sponsored travel, the use of U.S. flag carriers is required.

### **Use of U.S. Flag Carriers for Sponsored Foreign Travel**

<3301 GD.02Use of U.S. Flag Carriers for Sponsored Foreign Travel>

**6.4.1.8 Patient Care Costs**, inpatient or outpatient, for participants in a research study are allowable. Expenses directly attributable to research (i.e., research nursing, assays,

etc.) are not considered patient care costs and should be included in other appropriate budget categories.

**6.4.1.9 Alterations, Renovations and Construction Costs** are rarely allowable on research grant proposals. Any exceptions must be fully justified and it is strongly recommended that specific needs be discussed in advance with GCA and the sponsor.

**6.4.1.10 Other Direct Costs** may be used for other project expenses that do not fit into the above classifications. Examples include publication costs, human subject participation fees, repair and maintenance of equipment, rent and utility expenses, animal housing, machine shop charges, communication costs, tuition and some types of telephone service (i.e. long distance, toll charges).

**6.4.1.11 Subcontracts/Subawards** are agreements by which some scientific or programmatic aspects of a grant made to Yale are contracted out to another organization. The subcontractor is expected to work with great autonomy and take full responsibility for its portion of the work. This level of independence and participation in the development and execution of the project distinguishes a subcontractor from the provider of a purchased service (vendor). The primary proposal submitted to the sponsor must include evidence of commitment from the subcontractor, if the subcontractor has been identified, as well as a statement of work and proposed budget. GCA will require evidence of the agreement of the subcontractor institution before approving a proposal submission. Sponsor guidelines may vary; consult GCA for a discussion of typical requirements.

**6.4.1.12 Costs of Special Audits** The sponsor requires the conduct of an audit not subject to federal OMB Circular A-133, the cost of that audit report must be requested in the budget.

#### **6.4.2 Facilities and Administrative Costs (F&A)**

Facilities and Administrative (F&A) costs are costs that are not readily identifiable with individual projects. Also called "overhead" they include such categories as library operations, utility costs, depreciation of buildings and equipment, operations and maintenance costs, grant and contract administration and accounting, and general administrative expenses for central offices such as the President, Provost, Human Resources, and Purchasing.

Sponsored projects are generally charged F&A costs, whether identified in the award or not. The rates to be applied will be consistent with the rates negotiated with the federal government by the University. For Central Campus units the Provost or Deputy Provost, or in the case of some schools the Dean or Dean's designee, after consideration of the proposed award may choose to accept an alternative indirect cost arrangement.

In order for the University to recover costs that are typically included in the F&A rate calculation from non-federal sponsors that do not reimburse the University at the full approved rate, departments are encouraged to include the costs identified below in proposals to these non-federal sponsors for grant and contract awards.

#### **[Policy 1405: Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects](http://www.yale.edu/ppdev/policy/1405/1405.pdf)**

<http://www.yale.edu/ppdev/policy/1405/1405.pdf>

**6.4.2.1 Federal F&A Rates** Yale's federal Facilities and Administrative costs (F&A) rates are established through negotiations with the U.S. Department of Health and Human Services. These rates are fixed for a specified period of time and should be used for all grant or contract applications to federal sponsors, unless there is a restriction prohibiting indirect costs or designating another rate for a special program. F&A rates at Yale are based on the primary location of the work being performed: (1) On-Campus; (2) and (3) Off-Campus work at locations remote from Yale, such as field work. This work is usually for a continuous period in excess of several months.

Rate determinations are based on "predominance of effort" when there may be more than one site involved. Indirect costs are charged to a project by applying a percentage to the total direct costs of the project. In some instances the total direct cost may be modified to exclude capital equipment (any non-expendable equipment estimated to cost \$5,000 or more and with a useful life of one year or more), rent and utilities, tuition costs, patient care expenses related to "standard of care" (the cost for in-patient and out-patient care, but not payments to human subjects), graduate research assistant tuition costs charged directly to the project and subcontract expenditures in excess of \$25,000. This rate is known as the modified total indirect rate (MTDC).

If a project is carried out in space leased by the University and the rent is charged to the grant or contract the off campus rate is applied. Otherwise, if the lease is capitalized by the University the on-campus rate will be applied.

#### **Federal Overhead Rates**

[http://www.yale.edu/grants/proposal\\_dev/#fringe](http://www.yale.edu/grants/proposal_dev/#fringe)

**6.4.2.2 Non-Federal Overhead Rates – Non-Profit Organizations** For Non-Federal Agencies such as the American Cancer Society and similar non-profit organizations, if a sponsor has a written policy that limits the allowable rate of indirect costs, PIs/PDs should consult with the appropriate GCA to discuss whether Yale will accept the restriction.

#### **Policy 1405: Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects**

<http://www.yale.edu/ppdev/policy/1405/1405.pdf>

**6.4.2.3 Non-Federal Overhead Rates -- Corporate/Industrial Sponsors** The indirect cost rates used for sponsored research from corporate or industrial sponsors will be the federal uncapped research rate unless they are determined to be clinical trials.

#### **Non Federal Overhead Rates**

[http://www.yale.edu/grants/proposal\\_dev/facts.html](http://www.yale.edu/grants/proposal_dev/facts.html)

**6.4.2.4 Waivers of Overhead** Assessment of indirect costs to a sponsored project allows Yale to recover some its contribution to the support of the project. Therefore, assessment waivers are rarely given except in exceptional circumstances. For School of Medicine, waiver requests should be directed to the Deputy Dean for Finance and Administration. For other Schools, waiver requests should be directed to the Provost or appropriate Dean.

#### **Overhead Exemption Form (YSM)**

[http://info.med.yale.edu/finops/forms/Indirect\\_Cost\\_Exemption\\_Form5\\_07.doc](http://info.med.yale.edu/finops/forms/Indirect_Cost_Exemption_Form5_07.doc)

**6.5 Clinical Trial Budgeting:** Clinical trial budgets should reflect all of the projected costs that the department expects will be directly or indirectly associated with the conduct of the trial. The GCA Proposal Transmittal and Certification Form provides the format for recording all such costs.

#### **6.6 Cost-Sharing and Matching Funds**

The portion of the total sponsored project costs not funded by a sponsor is considered to be "cost sharing". University policy discourages voluntary committed cost sharing when submitting proposals to an external sponsor and expects that all proposal submissions only include the minimum amount of cost sharing necessary to meet the sponsors'

requirements. For most sponsors, cost sharing is not a requirement in order to receive the award.

There are several types of cost sharing: mandatory, voluntary committed, voluntary uncommitted, or in-kind/matching. Mandatory, voluntary committed cost sharing and in-kind/matching must be identified, administered, and accounted for consistently throughout the University. Cost sharing can also be provided in the form of salary and accompanying benefits (effort devoted to a sponsored project), materials and supplies or even by the waiver of Facilities and Administrative costs (F&A commonly referred to as indirect costs). Provided below are detailed definitions of the types of cost sharing with some common examples.

#### **6.6.1 Mandatory Cost Sharing**

Funding, either required by the terms and conditions of the award or by federal statute, that requires a University contribution toward the project as a condition of receiving the award.

#### **6.6.2 Voluntary Committed Cost Sharing**

A cost associated with a sponsored project and supported with University and/or other non-sponsored funds, which was identified in the proposal, but was not required or funded by the sponsor. Some common examples include:

- A percentage of effort of faculty or senior researchers included in a proposal budget or stated in the text of the proposal for which no compensation or only partial compensation was requested; and
- The purchase of equipment for the project, identified in the proposal, for which no funds or partial funds were requested.

#### **6.6.3 Voluntary Uncommitted Cost Sharing**

A cost associated with a sponsored project and not funded by the sponsor, which was not committed in the proposal or in any other communication to the sponsor. This includes effort of faculty or senior researchers that is over and above that which is committed and budgeted for in a sponsored agreement. Some common examples include

- Donated faculty effort on a sponsored project over and above the effort identified in the proposal or award; and
- Academic year effort on a sponsored project for which only summer salary was proposed, if the effort was not listed either on the budget page or in the body of the proposal.

#### **6.6.4 In-kind/Matching**

The requirement by some sponsors that grant funds be matched in some proportion with funds from another party, either from the University or another sponsor. Matching may be in the form of actual cash expenditure of funds or may be an "in-kind" match, which is the value of non-cash contributions to the project. In-kind or matching contributions made by a party other than Yale require documentation from that third party supporting the use of the funds as in-kind/matching and may require a certification of fair market value.

#### **Cost Sharing Approval**

**6.6.5 Voluntary Committed Cost Sharing** As defined above, voluntary committed cost sharing is a cost associated with a sponsored project, which was identified in a proposal, but was not required or funded by the sponsor. The University does not typically cost share on a voluntary basis, consistent with its objectives of receiving fair compensation from sponsors for research and scholarly activity conducted at the University. A voluntary commitment of sponsor-uncompensated effort and/or other types of commitment should be made only where the competitive circumstances or perceived

institutional benefit of receiving the award are deemed to be sufficiently strong to warrant the commitment.

Approval for voluntary committed cost sharing must be obtained from the Dean for self-support units or the Provost for FAS units prior to the preparation of the budget and budget justification. The signature of the Department Chair on a proposal transmittal sheet for a proposal indicates that he or she also has approved any voluntary commitment to cost share effort.

**6.6.6 Mandatory Cost Sharing and In-kind/Matching** Some sponsors may include a requirement for the University to cost sharing and/or provide in-kind contributions or matching to a sponsored project in their program announcement. Though this requirement is rare, it can be costly to the University. Approval must be obtained from the Dean for self-support units or the Provost for FAS units prior to the preparation of the budget and budget justification. The signature of the Department Chair on a proposal transmittal sheet for a proposal indicates that he or she also has approved any voluntary commitment to cost share effort.

**Policy 1306: Cost Sharing on Sponsored Projects**  
<http://www.yale.edu/ppdev/policy/1306/1306.pdf>

#### **6.7 Representations and Certifications**

For some proposals, special representations, certifications and acknowledgments may be required. GCA will complete these forms.

# Chapter 7

## Proposal Review, Approval, and Processing

### 7.1 Required Review and Signatures

No application may be submitted to any external sponsor without the prior approval of the University. The signature of the Institution's authorized official (AO) is necessary to indicate University compliance with sponsor and government regulations, acceptance of responsibility for the administration of the sponsored project, including the provision of adequate facilities and services, and for compliance with applicable University policies and procedures. Authorization may also represent pre-acceptance of terms and conditions of an award.

The Yale Corporation has authorized the Vice President for Finance and Administration to designate signature authority on sponsored projects to the Associate Vice President for Research Administration, the Executive Director of Grant and Contract Administration, the Deputy Director, and Associate Directors to sign for proposals, grants, contracts or other agreements on behalf of the Corporation.

### 7.2 Procedures for the Submission of Proposals

Proposals should be routed through the PI/PDs department business office before being sent to GCA at either 47 College Street (YSM and the School of Nursing) or 155 Whitney for proposals for the Faculty of Arts and Sciences, and the Schools of Forestry and Environmental Studies, Divinity, Law, Management, Art and Music, as well as all of the museums and galleries. Sufficient time should be allowed for administrative review and transmittal prior to any sponsor deadline. Electronic applications are held to the same standards and policies as those submitted in paper formats

All proposals submitted to GCA for review and submission to a sponsor, regardless of method, must be accompanied by the GCA Proposal Summary and Certification Form. The Transmittal Sheet must be signed by the PI/PD and his or her primary department business office and chair/school dean as well as any co-PI/PDs and their chairs/deans. If the PI/PD is associated with the VA or the Connecticut Mental Health Center designated institutional officials should also sign the Proposal Summary and Certification Form.

#### [Proposal Summary and Certification Form](http://www.yale.edu/grants/forms/docs/ProposalSummaryandCertificationForm.xls)

<http://www.yale.edu/grants/forms/docs/ProposalSummaryandCertificationForm.xls>

The PI/PD should note the number of copies of the proposal required by the sponsor and the deadline for submission of proposals. Normally the departmental personnel are responsible of the mailing of applications. A full copy of the final application must be provided to GCA within ten days of submission to the sponsor.

In instances when GCA may perform this task the required number of copies should be delivered to GCA. If the proposal is being sent via special carrier, charging instructions must be provided.

### 7.3 Paper Transmissions

If submitted in paper format, a draft of an entire proposal, including budget, justification, bios/cv's, other support information, and cover/signature pages must be submitted to the appropriate GCA Office in sufficient form and order to permit appropriate review before the sponsor deadline. A copy of the application guidelines or website address where the information can be accessed should also be appended.

#### **7.4 Electronic Submissions**

Proposals that must be transmitted electronically via an NSF FastLane or Grants.gov must be reviewed and approved before submission to the sponsor. Other systems (US Dept of Education, American Cancer Society) do not allow access for institutional review. In these cases, a copy of the proposal must be furnished to GCA for review and approval prior to submission by the PI/PD.

GCA will review proposals for compliance with University and sponsor requirements, ensure that information provided related to any required assurances is accurate and complete (i.e., use of human subjects or animals, lobbying, etc.) They will assist in obtaining approval for any unusual sponsor requirements, such as waiver of indirect costs or restrictions on dissemination of results, verify cost-share commitments and/or matching fund, verifying documentation for subcontractors and/or consultants, Proposal Summary and Certification Form for appropriate signatures and PI/PD compliance with relevant special reviews.

#### **7.5 Deadlines**

Sponsor requirements vary widely as to what is considered an "on-time" application. A receipt deadline is the date by which the sponsor must receive the proposal. A postmark deadline means that the proposal must be postmarked by the date, not necessarily received by the sponsor. In most cases, a proposal will not be considered if it misses the agency deadline. Any questions should be directed to GCA for clarification.

#### **7.6 Pre-Award Audit/Additional Information**

Some sponsors may require additional proof or supporting materials to document a proposed budget prior to award. It is strongly suggested that PI/PDs maintain a file of all supporting materials used in the development of a project budget. Examples of items that should be retained include copies of all price quotes for equipment, documentation of all travel costs, documentation of animal care costs, etc.

A sponsor may wish to support a proposed project, but at a reduced level of funding. If requested, a revised budget should be submitted to GCA for review and submission according to the same procedures followed for new proposals. Reductions in proposed budgets should be evaluated to determine whether there is a change in the PI/PD's level of effort or to the scope of work. PI/PDs are not expected or encouraged to negotiate directly with external sponsors. If a PI/ PD is contacted directly by a sponsor regarding the terms of an award under discussion, refer them to the appropriate GCA.

#### **7.7 Proposal and Award Tracking**

GCA maintains databases ("GPAS"; "COEUS") of all applications submitted and awards received for external funding. In addition, the GCA maintains the files of record for official grant and contract notices of award documents. All original award notices and any other sponsored project-related documents must be sent to GCA. PIs/PDs should keep copies for their records as well.

#### **7.8 Site Visits**

For large applications, sponsors may wish to visit the University to meet with those who will be responsible for the conduct and administration of the proposed project. The visits can vary from brief meetings to discuss the specifics of the science to multi-day reviews by a team of outside experts who will evaluate all aspects of the proposed work and the University environment available to support it. GCA must be notified of any proposed site visit. GCA staff can assist in preparing for these visits and will be available to meet with members of the site visit team. In order to save on their travel budgets, some sponsors hold "reverse" site visits where the PI/PD and other key personnel are invited to meet agency representatives at the sponsor's headquarters.

## **7.9 Protection of Confidential or Sensitive Proposal Information**

Proposals may contain sensitive information, including both personal and scientific materials that the PI/PD may not wish to have distributed publicly. Federally funded applications are a matter of public record and must be made available as stipulated by governmental regulations for audit and review. PIs/PDs will be notified of any requests for access under the "Freedom of Information Act" (FOIA) to provide an opportunity to review the application for any information that may be withheld under applicable law. Proposed responses to FOIA requests should be reviewed with the Office of General Counsel before submitting the responses. Most private sponsors also have audit and review requirements as conditions for acceptance of their funding. Any questions about inclusion of proprietary or other confidential information should be referred to the appropriate GCA Office.

### **7.9.1 Labeling of Proprietary Information**

Pages of an application should be labeled as proprietary and confidential if they would otherwise disclose information that is pending patent protection.

## Chapter 8

### 8.1 Award Acceptance

An award is most broadly defined as financial support for a specific research project, training program, equipment purchase or other activity. There are four basic types of awards, described below, which reflect how the funds are allocated and controlled.

**8.1.1 Grants** are transfers of funds to support specific projects in which the sponsor has an interest but does not play an active role. A grant is given without expectation of delivery of a specific product or service other than a final written report. Grants are written documents with general terms and conditions that usually stipulate a project period and minimal reporting requirements. They normally fund basic research, fellowships, and training.

**8.1.2 Contracts** are agreements entered into to provide support for a specific, often narrowly focused, set of tasks for the direct benefit of the sponsor. Contracts are written documents enforceable by law, typically with terms spelled out in greater detail than in a grant. The University is generally given less latitude to modify aspects of the scope of work and the budget. Contracts normally fund applied research, clinical trials, and service by the University.

**8.1.3 Subcontracts or sub grants** are contracts or grants issued under a larger agreement where a portion of the scope of work is delegated to Yale. Subcontracts are typically subject to the terms and conditions of the prime award.

**8.1.4 Cooperative Agreements** create a collaborative relationship between Yale and the sponsoring agency, which is often substantially involved with the project. The University does not have much latitude to modify the scope of work and the reporting requirements are usually fairly strict. Cooperative agreements are normally awarded in support of basic research.

### 8.2 Receipt of Award

Yale requires that all sponsored awards be reviewed and accepted by GCA on behalf of the University. Important points to be considered in a notice of award:

- **Period of Performance:** these dates may not coincide with the dates of the total project period
- **Name of Key Personnel:** The PI is responsible for conducting the project in accordance with University policies and sponsor requirements. However, other named Key Personnel may carry additional reporting and training requirements.
- **Dollars Committed and/or Obligated.** Not all project funds may be released at the beginning of the project but may be obligated incrementally. The sponsor is under no legal obligation to pay dollars not yet obligated.
- **Future Year Commitments:** These funds are contingent on their availability and on satisfactory progress on the project. Use these amounts for planning purposes.
- **Cost Sharing:** If the sponsor requires the University to contribute its own resources to the project, it usually specifies those requirements in the award notice. Accounting and reporting on these costs is a formal requirement for the University.
- **Accounting and Reporting Obligations:** Virtually all awards require technical and financial reports. Most awards require patent and property reports.
- **Deliverables:** Under some contracts, the University must deliver specified work products to the sponsor.
- **Payment to University:** Awards specify how the University will be funded or reimbursed by the sponsor.
- **Special Terms and Conditions:** The award may have additional terms and conditions which may specify limitations on availability or use of funds, need for prior approvals and similar additional oversight by the awarding agency. It is critical to understand these restrictions before incurring costs. Both the PI and the responsible Business Office must take note of these conditions.

### **8.3 Requesting and Modifying a Sponsored Project**

Generally, the event that formally initiates the sponsored award and project cycle is the submission of a proposal to GCA. This Office is responsible for approving and submitting proposals and for the details related to funding from external sponsors. They also review and accept the terms and conditions of sponsored contracts and agreements on behalf of the University. Requests for setting up or modifying a sponsored project should be directed to GCA.

**[Procedure 1304 PR.01: Procedure for Requesting and Modifying a Sponsored Project](http://www.yale.edu/ppdev/Procedures/ga/SponsoredProjectsNew/RequestingSponsoredProject.pdf)**

<http://www.yale.edu/ppdev/Procedures/ga/SponsoredProjectsNew/RequestingSponsoredProject.pdf>

**[Procedure 1304 FR.01 Requesting and Modifying Sponsored Projects - YSM](http://www.yale.edu/ppdev/Procedures/ga/SponsoredProjectsNew/RequestingSponsoredProject.pdf)**

<http://www.yale.edu/ppdev/Procedures/ga/SponsoredProjectsNew/RequestingSponsoredProject.pdf>

**[Procedure 1304 FR.02 Grant Budget Worksheet](http://www.yale.edu/ppdev/forms/ga/project_award_org/GrantBudgetWorksheet.xls)**

[http://www.yale.edu/ppdev/forms/ga/project\\_award\\_org/GrantBudgetWorksheet.xls](http://www.yale.edu/ppdev/forms/ga/project_award_org/GrantBudgetWorksheet.xls)

**[Procedure 1304 FR.05 YSM - Modification of a Sponsored Project](http://www.yale.edu/ppdev/forms/ga/project_award_org/YSMAMModifySponsoredProjectRequest.xls)**

[http://www.yale.edu/ppdev/forms/ga/project\\_award\\_org/YSMAMModifySponsoredProjectRequest.xls](http://www.yale.edu/ppdev/forms/ga/project_award_org/YSMAMModifySponsoredProjectRequest.xls)

**[Procedure 1304 FR.07 YSM - Requesting a New Sponsored Project](http://www.yale.edu/ppdev/forms/ga/project_award_org/YSMAMNewSponsoredProjectRequest.xls)**

[http://www.yale.edu/ppdev/forms/ga/project\\_award\\_org/YSMAMNewSponsoredProjectRequest.xls](http://www.yale.edu/ppdev/forms/ga/project_award_org/YSMAMNewSponsoredProjectRequest.xls)

### **8.4 Negotiation/Acceptance**

GCA is responsible for reviewing all terms and conditions of an award before acceptance to ensure that the sponsor's requirements are compatible with Yale's policies and procedures. Since a sponsored award binds both the sponsor and Yale to certain commitments, it is important that the terms are clearly understood and that all concerns are resolved before the award is accepted for the University. If a PI/PD is contacted directly by a sponsor regarding the terms of an award under discussion, they should be referred to GCA.

### **8.5 Signature Authority**

Many awards require the signature of an authorized institutional official to formally accept the terms and conditions of the award. GCA is responsible for obtaining the appropriate institutional signature.

Investigators are cautioned not to sign University agreements for sponsored support, patents or copyright licenses, biomaterials, equipment loans, materials transfer, or clinical trials. These agreements bind the University to certain obligations and, as such, can be signed only by those who have delegated signature authority from the Corporation, through the President and University officers.

### **8.6 Account Set-Up**

GCA has a designated Award Setup Unit (ASU). Once an award has been accepted for the University, an account number is established by the ASU to allow expenditures to be incurred. An account may not be opened for any federal award unless the PI/PD's Conflict of Interest disclosure is up-to-date and other required mandatory training (e.g., human subjects, animals) requirements have been fulfilled.

Award setup up sheets along with a copy of the award, are sent to the department business office and to Grant and Contract Financial Administration (GCFA) by the GCA ASU.

### **8.7 Pre-Award/Late Award Account Set-Up (At-Risk Accounts)**

Under certain conditions, a PI/PD may request an account prior to the actual receipt of the award. If a sponsor has approved funding, but is slow in sending the official award documentation, the PI/PD may submit a Late-Award Notice to GCA. The request must be signed by the department chair or dean. It is important to note that if funds are not awarded, the PI/PD's department or school will be responsible for covering any costs.

Pre-Award Costs are permissible under most federal grants and allow the institution to incur certain costs up to 90 days in advance of the actual award start date. The department chair or dean must indicate approval of the request by signing the form, as the department or school will be responsible for any costs incurred on the account should an award not be forthcoming.

#### **[At Risk Accounts: Guide 1304.01](http://www.yale.edu/ppdev/Guides/gc/1304GD.01AtRiskAccounts.pdf)**

<http://www.yale.edu/ppdev/Guides/gc/1304GD.01AtRiskAccounts.pdf>

# Chapter 9

## Post-Award Administration

### 9.1 Financial Management

The tasks associated with the financial management of externally sponsored funds may be divided into three very broad categories:

- Activities that bring the awarded funds into the institution
- Activities associated with the management of those funds while they reside in University accounts
- Activities that support the expenditure of sponsored funds

Based on the sponsor’s guidelines, the PI/PD, with assistance from GCA, determines the flexibility of budget categories, identifies restricted or prohibited budget categories, and notes the schedule for filing financial or technical reports with the sponsor. The business manager and/or GCA may be consulted for interpretation or other assistance.

The process of managing sponsored activity funds is a shared responsibility between the PI/PD, the business manager, GCA, and GCFA, and each has unique areas of primary responsibility.

GCA serves as the primary administrative liaison between PI/PDs, sponsors, the Provost, and other University offices in the post award period regarding award specific sponsor guidelines and regulations.

GCFA prepares required financial reports, manages the collection of grant funds, maintains accounting records for each sponsor, draws funds under the federal letters of credit as costs are incurred, issues billings to sponsors and follows up with sponsors on payments are required by the terms of an award, monitors overspending, coordinates government, private sponsor and public accounting firm audits, develops and negotiates federal facilities and administrative and fringe benefit rate agreements, administers government property accounting inventory, and conducts space function and departmental administration surveys.

The following Sponsored Projects Policies are of direct relevance to the **Financial Management** of sponsored projects proposals:

<a href="#">Policy 1305</a>	<a href="#">Cost Transfers Involving Sponsored Projects</a>
<a href="#">Policy 1403</a>	<a href="#">Charging of Administrative and Clerical Salaries and Certain Other Expenses to Federal Funds</a>
<a href="#">Policy 1405</a>	<a href="#">Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects</a>
<a href="#">Policy 1306</a>	<a href="#">Cost Sharing on Sponsored Projects</a>
<a href="#">Policy 1307</a>	<a href="#">Subrecipient Monitoring</a>
<a href="#">Policy 1308</a>	<a href="#">Program Income Associated with Sponsored Projects</a>
<a href="#">Policy 1311</a>	<a href="#">Institutional Base Salary for Sponsored Projects</a>
<a href="#">Policy 1315</a>	<a href="#">Effort Reporting: Certifying Effort on Sponsored Projects</a>
<a href="#">Policy 1316</a>	<a href="#">Effort Commitment: Managing Effort Associated with Sponsored Projects</a>

<a href="#">Policy 4209</a>	<a href="#">Equipment</a>
<a href="#">Policy 1307</a>	<a href="#">Sub Recipient Monitoring</a>
<a href="#">Policy 1301</a>	<a href="#">Sponsored Projects Financial Reporting and Financial Closeout</a>

## 9.2 Personnel

Appointments of all personnel to sponsored projects are subject to the Human Resource policies of the University. Payment of all personnel is effected through the University's Personnel/Payroll System and is administered in the departmental business office.

### Faculty and Staff Salaries

A research project should be charged with a portion of each employee's institutional base salary equal to the portion of time or effort devoted directly to the project unless an approved portion is "cost shared" by the University. For a faculty member with a nine-month appointment, one month of effort is one-ninth of his/her academic year salary. Salary increases can be charged proportionally to the project if they can be accommodated within the project budget.

### **Guide 1316 GD.01 Effort Percent /Calendar Month Conversion Tables**

[http://www.yale.edu/ppdev/Guides/gc/1316GD.01EffortPercent\\_CalenderMonthConversionTables.pdf](http://www.yale.edu/ppdev/Guides/gc/1316GD.01EffortPercent_CalenderMonthConversionTables.pdf)

### Summer Salaries

Most sponsors will provide for compensation of faculty members with nine-month salary bases during summer months at their regular University salary rates when included as part of the project proposal. Submission by the University of a proposal that provides for summer salary does not imply a University commitment to pay such salaries in the event that the sponsor does not provide for summer salaries in the project award nor does it imply that the University will pay the capped portion of a salary if the sponsor imposes such a cap.

### Additional Compensation

Project funds may not be used to increase the regular compensation of the principal investigator or other University staff members.

### Graduate Research Assistants

Graduate research assistants should be separately budgeted for their salary/stipend and for their tuition remission. Since Yale calls these salary payments "stipends" these must be qualified as non-salary stipends wherein the recipient is not an employee of the University. Stipends are specifically unallowable on NIH research awards (the R, S, U, N, and P series).

### Postdoctoral Associates

Postdoctoral Associates must be paid as employees of the University. Stipends are specifically unallowable on NIH research awards (the R, S, U, N, and P series).

## 9.3 Post-Award Changes and Approvals

Frequently, projects change or evolve from how they were first proposed to or funded by a sponsor. Many changes that occur in the conduct of sponsored projects require prior written approval from the sponsor and or GCA. The level at which approval may be granted depends upon the type of award and the sponsor's specific policies governing the award.

## 9.4 Re-budgeting of Funds and Prior Approval

During the conduct of the project, the PI/PD may determine that budget changes are necessary. Many sponsors allow flexibility in how project funds are expended and permit budget changes needed to meet project requirements. PI/PD's need to be aware of the specific requirements for their awards and to request prior approval for budget changes when necessary. Significant changes to a budget almost always require prior approval by the sponsor as do changes in the objectives or scope that significantly alter an original statement of work. Restrictions on budget revisions, including moving funds from one category to another, may not be allowed. Other actions that may be considered a change of scope include:

- Substitution of one animal model for another
- Any change from the approved use of animals or human subjects
- Applying new technology
- Transferring the performance of substantive programmatic work to a third party
- Absence or change of Key Personnel may require the prior approval of the awarding agency and is normally required for any absence of the PI/PD for a period of 3 months or more. A substitute PI/PD may be named or the award may be relinquished.
- In general, changes in key personnel named in the notice of grant award whose expertise is critical to the approved project must also have prior approval.
- Foreign Travel may require special review, even when the foreign travel has been included in the initially approved budget.
- Issuance of subcontracts or sub agreements not included in an original proposal

Any request for modification sent to the sponsor must be in writing and must be reviewed and countersigned by GCA. Some sponsors require up to 90 days prior notice.

**9.5 No-Cost Extensions** are requests to extend the termination date of a project without additional funds. Some federal sponsors allow the institution to internally approve an extension; other sponsors require that a form a request for additional time be submitted for their approval. In any case, the request usually must be processed at least 45 days prior to the scheduled termination date of the project. Carry forward of funds that are unspent at the end of a budget period in a multi-year project are dealt with differently by different sponsors. GCA should be consulted for the specific requirements of the award and agency. PIs must continue to devote the same level of effort as in the period preceding the extension, unless prior approval for reduction has been received.

**9.6 Relinquishment of an Award.** A PI/PD leaving Yale for a position at another institution may, with the agreement of the sponsor, be able to transfer a grant/contract to another academic or non-profit organization. Because sponsored project awards are made to the University, and not to the individual investigator, the University must agree to relinquish an award.

## **9.7 Allowability of Costs (See also Chapter 6.1)**

### **9.7.1 Cost Allocations**

Goods and services purchased by the University to conduct research may often benefit more than one sponsored award. Such costs must be allocated to the sponsored awards in proportion to the actual benefit received by the awards. If it is impossible or impractical to determine how much of the goods or services are actually used for each award, an allocation methodology must be developed that reasonably estimates the actual benefit to each award. Costs are then distributed to each benefiting sponsored award using the allocation methodology.

OMB Circular A-21 allows for two methods for allocating an allowable direct cost to two or more grants:

- Proportional Benefit: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects.
- Interrelationship: If a cost benefits two or more projects or activities in proportions that cannot be easily determined due to the interrelationship of the work involved, then the cost may be allocated to the benefiting projects on any reasonable basis.

Examples of acceptable allocation methodologies include: Effort of research personnel (headcount or FTE's), laboratory space (square footage), number of experiments, actual usage records or modified total direct costs (excluding subawards) budget of benefiting sponsored projects.

**Guide 1304 GD.02**

<http://www.yale.edu/ppdev/Guides/gc/1304GD.02CostAllocation.pdf>

**Procedure 1305 PR. 02: Cost Transfer Procedure**

<http://www.yale.edu/ppdev/Procedures/gc/1305PR.02CostTransferProcedures.pdf>

**9.8 Cost Transfers**

A cost transfer is the reassignment of an expense to a sponsored project after the expense was initially charged to another sponsored project or non-sponsored project.. The University expects that all costs charged to a sponsored project are correctly charged at the outset. However, the PI and Business Manager should review monthly sponsored project reports to identify legitimate errors in a timely manner.

When errors are discovered, the University is committed to ensuring that all cost transfers (either in the form of a labor distribution adjustment or non-salary journal entry) are legitimate and are conducted in accordance with sponsor terms and conditions, regulations and University policy. Frequent, tardy, or poorly explained transfers can raise serious questions about the propriety of the transfers, the accounting system, and internal financial controls.

All Principal Investigators (PI) and their Business Managers are responsible for ensuring that transfers of costs to sponsored projects represent corrections of errors and are made promptly.

Cost transfers must be supported by documentation which contains a full explanation of how the error occurred and a correlation of the charge to the project to which the transfer is being made. Explanations such as "to correct an error" or "to transfer to correct project" are unacceptable.

Transfers of costs to any sponsored project account are allowable only where there is direct benefit to the project account being charged. An overdraft or any direct cost item incurred in the conduct of one sponsored project may not be transferred to another sponsored project account merely for the sake of resolving a deficit or an allowability issue. Cost transfers should not be used as a means of managing awards.

Cost transfers must be prepared and submitted within 90 days from the end of the calendar month in which the transaction appears on the award. Cost transfers made after this period require prior Office of Grant and Contract Financial Administration (GCFA) approval and will only be permitted under extenuating circumstances.

Cost transfers to correct an error must be completed regardless of timeframe if the correction benefits the sponsor.

Yale University expects that costs directly charged to federally sponsored awards received by the University will comply with the cost principles outlined in the Office of Management and Budget's (OMB) [Circular A-21](#).

**Policy 1305: Cost Transfer Policy**

<http://www.yale.edu/ppdev/policy/1305/1305.pdf>

**Procedure 1305 PR. 02: Cost Transfer Procedure**

<http://www.yale.edu/ppdev/Procedures/gc/1305PR.02CostTransferProcedures.pdf>

**Procedure 1305 PR. 04: Unallowable Costs**

<http://www.yale.edu/ppdev/Procedures/gc/1305PR.04UnallowableCosts.pdf>

**Guide 1305 GD. 07: Determining Allowability, Reasonableness, and Allocability of Costs for Sponsored Projects**

<http://www.yale.edu/ppdev/Guides/gc/1305GD.07ReasonablenessAllowability.pdf>

**Form 1305 FR. 15: Journal Staging Area - Cost Transfer Justification**

<http://www.yale.edu/ppdev/forms/gc/1305FR.15JSACostTransfer.xls>

**Form 1305 FR. 16: Labor Distribution - Cost Transfer Justification**

<http://www.yale.edu/ppdev/forms/gc/1305FR.16LDCostTransfer.xls>

### **9.9 Effort Commitment and Reporting**

As a condition of receiving funding from the federal government, universities must maintain an acceptable system of reporting effort devoted to sponsored projects. A critical requirement of any effort reporting system is that the system must allow responsible individuals to certify the portion of effort and salary devoted to each sponsored project activity. The following addresses Yale's response to the effort reporting requirement.

Effort reporting is an important area of financial compliance of sponsored projects. Recognizing this importance, the University has developed policies, procedures and training materials outlining and explaining the effort reporting requirements. Below are two policies with which faculty and administrators need to be familiar. These policies outline the requirements associated with committing and certifying effort in accordance with the Federal Government's Office of Management and Budget Circular A-21.

Outlined below are some of the significant points of each of the two Yale effort policies. Policy 1316 focuses on the requirements associated with the commitment of effort in a proposal and actual effort requested when an award is received. Policy 1315 focuses on the certification of effort and the requirements imposed on the University as indicated in the Office of Management and Budget Circular A-21.

#### **9.9.1 Committing Effort**

##### **Policy 1316 - Effort Commitment: Managing Effort Associated with Sponsored Projects**

At the time of proposal development, the Principal Investigator prepares a budget in which s/he determines the percent of effort or person months needed for each of the positions proposed to work on the project. In preparing such a budget and managing effort once an award is received, the following key elements must be taken into consideration:

- **Maximum Allowed Sponsored Project Effort**
  - Most faculty responsibilities would preclude one from being paid 100% of their salary from a sponsored project. (With few exceptions, the effort devoted to writing of a new proposal application cannot be charged to an existing sponsored project.)

- Minimum Proposed Effort
  - All proposals must show some level of activity (1% or more) by the faculty listed as PI or key personnel unless specifically exempted by the sponsor (e.g., equipment grants).
- Committed Cost Sharing of Effort
  - Uncompensated effort committed in a proposal is considered voluntary committed cost sharing. This type of cost sharing must be accounted for through the creation of a cost sharing account once the award is received. At the time of award set-up, a cost sharing account is created.
- Summer Effort/Salary for Faculty with 9-Month Academic Appointments
  - Faculty receiving summer salary from sponsored projects can only be paid from those projects on which effort was expended **during** the summer effort reporting period.
- Salary Cap Cost Sharing
  - Salary differential over a sponsor imposed salary caps (e.g., NIH, AHRQ, SAMSHA) and the computed salary for a given amount of effort is considered by Yale to be cost sharing. Therefore, the individual must expend at least the amount of effort committed even when the salary cap does not permit the recovery of the corresponding salary.

### 9.9.2 Certifying Effort

#### Policy 1315 - Effort Reporting: Certifying Effort on Sponsored Projects

Once an award is received and effort is devoted to the sponsored project, the University is responsible for providing a mechanism through which the effort devoted to the project is certified. In certifying effort the following points must be considered:

- The percentage of an individual's salary charged to a sponsored project cannot exceed the percentage of the individual's effort that is expended on the project during an effort reporting period.
- If the percentage of effort expended in a given effort reporting period is less than the percentage of salary charged to the sponsored project during the period, the salary charges must be reduced to reflect actual effort.
- Generally, once a certification of effort has been completed, future salary reallocations will not be permitted unless doing so favors the sponsor. To modify an effort report after certification puts into question the veracity of the original certification.
- 100% Effort ≠ 40 hours ≠ 60 hours ≠ 10 hours, etc.
- There is no fixed work week (for faculty and certain "exempt" staff)
- Effort includes **only** those activities compensated by Yale and excludes bonuses and one time extra compensation.
- Effort reporting excludes external consulting activities and VA compensated effort paid directly by the VA.
- All faculty **must** sign their own effort form (and those of subordinates paid from the project unless delegated in writing to a responsible person who, using a suitable means of verification, can ascertain that the work was performed).

The completion of an Effort Report is not solely to certify effort devoted to a sponsored project. OMB Circular A-21 requires a certification system take into account all of the research and non research activities and associated effort performed by the individual. For example, a faculty member who is teaching and conducting administrative duties must include the effort devoted to those activities in the Effort Report. This is easily done through the category called Non-Sponsored Activities rather than listing each specific category of activity.

### 9.9.3 Activities Associated with Sponsored Project Effort

Identification of the appropriate activities that can be supported by a sponsored project is critical to accurate effort reporting. Many work related activities though expected and

paid for by the University may not be appropriate for a sponsored project and do not further the mission of the project. Listed below are some of the activities that may or may not be appropriate for a sponsor to support.

**9.9.3.1 Examples of activities that *are* part of sponsored projects effort:**

- Effort devoted to conduct the research as identified in the proposal supported by e.g., NIH, NSF, DOD, foundations, or clinical trials.
- Writing a progress report for an existing award.
- Holding a research meeting with lab staff.
- Attending a scientific conference related to the research being conducted and held by an outside professional society.
- Reading scientific journals to keep up to date with the latest advances in the field of research.

**9.9.3.2 Activities *not* part of a sponsored project effort:**

- Writing a new grant application (unless an expectation of a specific program such as an NIH Career award).
- Mentoring a junior faculty member in the department (unless part of a sponsored project requirement).
- Attending departmental faculty meetings.
- Serving on the IRB/IACUC
- Serving on an NIH Study Section

**9.9.4 Important Considerations**

As sponsored projects start, expire and overlap it is important that the line of communication remain open between the PI/PD and the business office. The business office staff needs to know what individuals are expected to work on a new project and what awards or University accounts individuals will transfer to when an award expires. In addition, it is important for all parties to address effort commitments that will not be met or the need for a no cost extension to continue a project. Effort requirements could involve multiple parties; the PI/PD, business office staff, Grant and Contract Administration and the sponsor.

**[Policy 1315: Effort Reporting: Certifying Effort on Sponsored Projects](http://www.yale.edu/ppdev/policy/1315/1315.pdf)**

<http://www.yale.edu/ppdev/policy/1315/1315.pdf>

**[Procedure 1315.02: Effort Reporting](http://www.yale.edu/ppdev/Procedures/gc/1315PR.02EffortReporting.pdf)**

<http://www.yale.edu/ppdev/Procedures/gc/1315PR.02EffortReporting.pdf>

**[Policy 1316: Effort Commitment: Managing Effort Associated with Sponsored Projects](http://www.yale.edu/ppdev/policy/1316/1316.pdf)**

<http://www.yale.edu/ppdev/policy/1316/1316.pdf>

**9.10 Other Financial Management Issues**

Most awards are made on a "cost-reimbursable" basis and the University is reimbursed for actual expense incurred, usually on a monthly basis, by billing the sponsor or by drawing against a sponsor's letter of credit account. Some awards, usually from private sponsors, are funded by a payment schedule which typically includes some advance payment. Should the PI/PD receive a sponsor check, he/she should take it to his/her business office which will forward it immediately to GCFA along with identifying information for deposit to the project account.

**9.10.1 Purchasing**

PIs/PDs should first consult with their business managers for help and information about purchasing and ordering procedures. Procedures vary depending upon what is ordered. Yale has contracts with some vendors. Most large items require bids, or unique source justification. Consulting with the appropriate person in the purchasing department can

greatly simplify and facilitate the process. In addition, PIs/PDs may wish to review the information available the Purchasing web site. PIs/PDs should note that special procedures apply to the purchase of hazardous and other restricted items.

**Procurement Website**  
<http://www.yale.edu/procurement/>

### **9.10.2 Equipment**

The University must properly classify, safeguard and depreciate its equipment, and must abide by federal guidelines and the terms of sponsored awards with respect to the purchase, use and disposition of equipment.

PI/PDs planning to purchase equipment using sponsored project funds should refer to the specific terms of the sponsored agreement and contact the Offices of Grant and Contract Administration (GCA) for any necessary advance approvals.

Each department of the University should maintain an accurate inventory of its equipment. In addition, federal regulations require that a complete equipment inventory survey be taken every two years by Grant and Contract Financial Administration (GCFA).

**Policy 4209: Equipment**  
<http://www.yale.edu/ppdev/policy/4209/4209.pdf>  
**Guide 4209 GD.01 Fixed vs. Movable Equipment**  
<http://www.yale.edu/ppdev/Guides/gc/4209GD.01FixedvsMovableEquipment.pdf>  
**Form 4209 FR 01: MEI Change in Status**  
<http://www.yale.edu/ppdev/forms/purchase/MEI1WINDOWS.xls>  
**Form 4209 FR 02: MEI Change in Status**  
<http://www.yale.edu/ppdev/forms/purchase/MEIChangeStatus.xls>

### **9.10.3 Animal Charges**

Yale investigators conducting protocols involving animals will incur animal-related charges, including purchases and husbandry costs. As stated in the *Animal Care and Use* section in Chapter 3, PI/PDs are responsible for assuring that there is an approved protocol on file with the IACUC Office for any work involving the use of animals, and in the case of externally funded research, that the approved protocol is linked (congruent) with a specific proposal or sponsored project. Charges for the purchase or caring for animals **should not** be charged to a sponsored award prior to receiving such approval (congruency).

### **9.10.4 Travel**

In addition to meeting all other policy requirements, travel costs charged to grants and contracts are subject to specific limitations and restrictions, in accordance with terms set by the sponsor. Travel policies of federal and non-federal sponsors vary.

Travelers on University business trips that are funded directly or indirectly by a federal grant or contract must abide by the OMB Circular A-21 rules on air travel.

- Foreign Travel:
  - Fly America Act: For international air travel, Federal requirements state that American carriers must be used when a traveler is flying between the United States and another country or between other countries. Not using American flag carriers when only cost and convenience are factors is not

permitted. Exceptions to use of American carriers can be found in the University's *Travel On University Business* Policy.

- **Prior Approvals:** Grants from some federal agencies and most federal contracts require that all international travel, even if included in the award, be approved from 45 to 90 days in advance by the sponsor's administrative officer.
- **Domestic Travel:** Domestic Travel is defined as travel within and between any of the 50 United States, Puerto Rico, U.S. Virgin Islands, travel between the United States and Canada and within Canada. When traveling domestically, one should use the lowest available economy class airfare.
- **Alcohol and Entertainment Expenses:** Expenses for alcoholic beverages and entertainment expenses cannot be charged to a federal grant or contract and must be coded as an unallowable expense.

**[Policy 3301: Travel on University Business](http://www.yale.edu/ppdev/policy/3301/3301.pdf)**

<http://www.yale.edu/ppdev/policy/3301/3301.pdf>

**[Guide 3301 GD.02: Use of U.S. Flag Carriers for Sponsored Foreign Travel](http://www.yale.edu/ppdev/Guides/purchase/3301GD.02USFlagCarrier.pdf)**

<http://www.yale.edu/ppdev/Guides/purchase/3301GD.02USFlagCarrier.pdf>

**[Form 3301 FR.06: Fly America Act Waiver](http://www.yale.edu/ppdev/forms/ap/3301FR.6FlyAmericaActChecklistWaiver.pdf)**

<http://www.yale.edu/ppdev/forms/ap/3301FR.6FlyAmericaActChecklistWaiver.pdf>

### **9.10.5 Program Income**

Program Income is gross income directly generated by a supported activity or earned as a result of an award and earned by the recipient during the period of a sponsored award.

The treatment of program income on federal grants is stipulated by the administrative requirements of the awarding agency. Similarly, non-federal sponsors may have terms and conditions that govern the treatment of program income.

Treatment of program income earned under contracts will be handled on a case by case basis under the terms and conditions of a particular contract.

There are three methods for treating Program Income:

- *Additive:* Program income funds are added to committed funds of the project by the awarding agency and recipient, thus increasing the amount available to accomplish program objectives (increase in available budget).
- *Matching:* Program income is used to finance the non-federal share of the project (offset to cost sharing or matching). Program income is used for costs during the project period unless the sponsor authorizes deferral to a later period.
- *Deductive:* Total funds available to the project remain the same and the funds generated through program income are deducted from the financial commitment of the sponsor (offset to sponsor's funding).

Principal Investigators are responsible for:

- Identifying sources of actual and potential program income at the proposal stage;
- Completing required program income sections in grant proposal, as necessary;
- Developing a plan for using program income;
- Discussing anticipated program income with the department administrator / business support center;
- Verifying program income on reports; and
- Addressing account balance issues at final project termination.

Department Administrator/Business Support Center is responsible for:

- Assisting Principal Investigator in calculating prices
- Billing for products or services which produce program income
- Reconciling revenue invoiced or submitted against financial reports
- Monitoring levels of program income in account and any limits that are set by the sponsor
- Properly depositing income received in accordance with University's revenue policy
- Monitoring expenditure levels

**Policy 1308: Program Income Associated with Sponsored Projects**

<http://www.yale.edu/ppdev/policy/1308/1308.pdf>

**9.10.6 Interest Bearing Accounts**

The University will accept grants which contain a provision requiring the accrual of interest on advance payments. Depending on the terms and conditions of the award, interest earned may need to be returned to the sponsor or used to further support the purposes of the sponsored project. For federal awards, interest on "excess cash" (cash in excess of current expenses) in excess of \$250 annually must be returned to the federal government.

**9.10.7 Internal Service Providers (ISPs)**

An Internal Service Provider is a unit that regularly provides goods and/or services to other University Organizational Units or Departments and charges for those goods or services. ISPs include: Specialized Service Facilities, Recharge Centers, and Cost Allocation Units as defined in Policy 1410. All ISPs are required to register with the ISP Standards Committee annually to function as an ISP and must comply with Policy 1410.

**Policy 1410: Internal Service Providers**

<http://www.yale.edu/ppdev/policy/1410/1410.pdf>

**1410 PR. 01 Internal Service Providers: Registration and Annual Renewal**

[http://www.yale.edu/ppdev/Procedures/isp/1410PR.01\\_ISP\\_RegistrationAnnualRenewal.pdf](http://www.yale.edu/ppdev/Procedures/isp/1410PR.01_ISP_RegistrationAnnualRenewal.pdf)

**1410 PR. 02 Internal Service Providers: Rate Calculations**

[http://www.yale.edu/ppdev/Procedures/isp/1410PR.02\\_ISP\\_RateCalculations.pdf](http://www.yale.edu/ppdev/Procedures/isp/1410PR.02_ISP_RateCalculations.pdf)

**1410 PR. 03 Internal Service Providers: Accounting and Billing**

[http://www.yale.edu/ppdev/Procedures/isp/1410PR.03\\_ISP\\_Accounting\\_Billing.pdf](http://www.yale.edu/ppdev/Procedures/isp/1410PR.03_ISP_Accounting_Billing.pdf)

**1410 FR. 13 Internal Service Providers: Registration**

[http://www.yale.edu/ppdev/forms/isp/1410FR.13\\_ISP\\_Registration.doc](http://www.yale.edu/ppdev/forms/isp/1410FR.13_ISP_Registration.doc)

**1410 FR. 14 Internal Service Providers: Rate Calculation**

[http://www.yale.edu/ppdev/forms/isp/1410FR.14\\_ISP\\_RateCalculation.doc](http://www.yale.edu/ppdev/forms/isp/1410FR.14_ISP_RateCalculation.doc)

**9.10.8 Financial Monitoring**

Overspending or under spending projects can reflect poorly on the PI/PD, GCFA, and Yale University. It can indicate inadequate planning or poor internal financial management. A major responsibility shared by the PI/PD, the departmental business office, and GCFA is to carefully monitor the budget and ongoing charges. If a project ends with a deficit, the PI/PD's department or administrative area is responsible for covering the remaining expenditures. Underspent Projects, though less obviously of concern than overspending, can still be serious. Particularly severe under spending (20 percent or more of a project's total direct costs) can also suggest that the goals of a project have not been met. In most cases funds not spent by the end of the project period must be returned to the sponsor.

To avoid either of these issues, careful planning, monitoring, ongoing communication with the sponsor, and revising the work plan as needed should be the norm throughout the life of the project. Reports are available from the University financial system (BUG 211A, 411A) to reflect sponsored project activity. This information should be used by the PI/PD and business manager to monitor the financial health of a sponsored research project and reviewed to determine if:

- Charges are within agreement, budget, and agency guidelines
- Charges are reflected in the correct budget categories
- Funds are being expended in a timely manner
- Cost overruns or under spending are developing in specific budget categories

**Procedure 1310 PR. 03: Deficit Fund Balances and Sponsored Agreement Overdraft**

<http://www.yale.edu/ppdev/Procedures/ga/MonthlyStatementsDeficitFundBalance/DeficitFundBal.pdf>

**9.10.9 Sub-Recipient Monitoring**

As a condition of its acceptance of funding from sponsors, the University is obligated in its role as primary recipient to undertake certain stewardship activities as well as comply with federal, state and local regulations when sub contracting activity is involved.

Prior to award GCA assesses a sub-recipient organization's financial status and internal controls and establishes terms and conditions in the sub-recipient agreement consistent with the level of perceived risk.

PIs are responsible for monitoring the progress of sub-recipient work scope, using a variety of means to make this determination. Such review should generally take place at least quarterly.

Sub-recipient invoices submitted to a department must contain a minimum amount of information including but not limited to:

- name of sub-recipient
- date of invoice
- invoice number
- period of performance covered by invoice
- description of services reflected by billings (e.g., major expenditure categories);
- current period costs, including cost sharing (in sufficient detail to enable comparison to project budget)
- cumulative project costs, including cost sharing, as compared to the project budget;
- sub-recipient contact person with respect to the invoice
- Certification on each invoice as to the truth and accuracy of the invoice.

Departments must submit invoices to GCFA for payment within 30 days of the invoice date unless there are extenuating circumstances that have been approved by GCFA. Departments must retain a copy for departmental records. Administrators are responsible for reviewing and approving invoices from sub recipients for adherence to budget. The department administrator's signature on the invoice indicates that review has taken place and that the invoice adheres to budget. The PI/PD signature indicates that the technical and scientific work is being performed in accordance with the approved scope of work.

### **Policy 1307: Sub-Recipient Monitoring**

<http://www.yale.edu/ppdev/policy/1307/1307.pdf>

### **Procedure 1307 PR. 01: Monitoring Sub-Recipient Activity Associated With Sponsored Projects**

<http://www.yale.edu/ppdev/Procedures/gc/1307PR.01MonitorSubRecipientSponsoredAwards.pdf>

#### **9.10.10 Project Reporting and Financial Closeout**

Sponsors typically require both periodic financial and technical reports. The schedule for completing reports and format are outlined in the sponsor's notice of award or in the agency general terms and conditions.

GCFA submits financial reports to the sponsors for research and other scholarly activity that accurately reflect the actual use of sponsored funds as recorded in the financial records of the University; and are in compliance with the sponsor's terms and conditions. Achieving compliance with this policy is a responsibility shared by PI's.

Upon termination of the project, the PI/PD is responsible for submitting the final Technical Report to the sponsor within the timeframe specified. Failure to submit this report in a timely manner could jeopardize future funding by the sponsor not only for the PI but also for other Yale investigators funded by the same sponsor. A copy of a project's final report must be submitted to GCA.

GCFA is responsible for preparing interim, final financial reports and invoices based on institutional financial records and in accordance with the terms and conditions of the sponsored award. The PI/PD's business office must sign off on interim financial reports and return them to GCFA within the time period specified by GCFA. Draft interim reports not returned within the specified period will be submitted to the sponsor based on University's financial records without departmental approval.

Departments considered to be the responsible entity and owner of an award will review and verify draft final FSRs, communicate changes and additional information to GCFA, and return the draft FSR, signed by the department business office or the PI generally, no less than 30 days prior to sponsor's reporting deadline or other deadline assigned by GCFA. Except in unusual circumstances approved by the Director of GCFA, the University will not file final financial reports which show unliquidated obligations or commitments.

At the time of closeout, GCFA is responsible for changing the award status in the University financial system to "Closed" to prevent further charging to the account.

### **Policy 1301: Sponsored Projects Financial Reporting and Financial Closeout**

<http://www.yale.edu/ppdev/policy/1301/1301.pdf>

#### **9.11 AUDITS**

##### **9.11.1. Overview**

Sponsors presume that the University will expend funds for the purposes for which they were given and in accordance with any terms and conditions set forth in the award document. Sponsors generally reserve the right to audit the University financial records for sponsor awards and, in some cases, may audit the project's scientific records and data. If a PI/PD or Department is contacted directly regarding any type of audit, GCFA should be informed immediately.

##### **9.11.2 Pre-Award Audits**

Occasionally a sponsor may require an audit before the issuance of an award. Such pre-award audits generally involve responses to federal requests for proposals that will result in the issuance of a contract that is more than \$500,000 per year.

### **9.11.3 Post-Award and System Audits**

The "Single Audit Act of 1984" and the Office of Management and Budget (OMB) Circular A-133 require an annual audit by the University's certified public accountants, as required.

Any federal agency, however, can also audit its awards. These audits tend to be efforts to determine whether the University is managing grants and contracts in accordance with federal laws and regulations.

### **9.11.4 Audit Request**

GCFA is the focal point for the coordination and conduct of financial audits of sponsored programs. Upon notification of an audit GCFA will inform the Controller, University Auditing, the Office of General Counsel (if appropriate), the department business office and the PI/PD of the anticipated audit.

Upon being contacted by GCFA, the Business Office will designate an individual with knowledge of program expenditures for the purpose of answering questions that may arise during the audit. The Business Office must also notify and/or arrange for the principal investigator or other individuals at the department or school level to be available for an interview, if so requested by the auditors.

### **9.11.5 Entrance Conference**

Auditors will often request an entrance conference. If the PI/PD and Business Office representative need to be present they will be notified by GCFA. A GCFA representative will act as the liaison between the auditors and all other University areas for the purpose of retrieving documentation and/or contact with department personnel.

### **9.11.6 Documentation Requests**

Auditors must provide a list of required documentation identifying each transaction to be reviewed.

### **9.11.7 Exit Conference and Audit Reports**

An exit conference is normally conducted at the close of any audit.

## Chapter 10

### Other Awards and Agreements

There are a number of types of non-federal awards and agreements in support of research that also require special consideration. As with grants and contracts, all agreements discussed below, with the exception of consulting agreements, require an authorized institutional signature and must be reviewed by the appropriate GCA.

#### 10.1 Collaborative Agreements

These are agreements under which Yale investigators work with researchers from other non- or for-profit entities on defined research projects. These may involve sharing or exchange of research materials and other resources, and contemplate intellectual input from both parties. Yale may also receive funding from the entity that employs the collaborating researchers. Important considerations include whether any confidentiality provisions are included in the agreement and, if so, whether the terms have been communicated to all key personnel; any Intellectual Property (IP) terms governing ownership and access to any resulting inventions; and any cost sharing that may be contemplated.

#### 10.2 Service Agreements

Service agreements stipulate that Yale will provide services to another entity or that another entity will provide services to Yale. Projects must be in accord with the mission of the University and must contribute to the objectives of the Department and School.

Service agreements may address a variety of areas:

- Service agreement for analysis or assay
- Use agreements (may include equipment, facilities, computer programs)
- Physician specialties (excluding VA Administration)

Service Agreements that include the loan of equipment should involve both GCA and the Purchasing Department to ensure that the terms are consistent with those typically negotiated with an equipment vendor and place the University in a position of minimal risk and liability. Other considerations include the eventual disposition of the loaned equipment, cost of equipment maintenance and possible confidentiality of equipment specifications or performance. While the data resulting from a testing agreement may be linked with a sponsor's material (which may or may not be proprietary), the agreement should not prohibit publication by the University of the PI/PD's methods.

Budgeting for service agreements assumes recovery of full cost including F&A. Payment of testing or analysis performed on a piece of equipment purchased with federal funding may be accountable as program income to the federal award. Testing arrangements must be competitive with the costs assessed by commercial organization. Any inappropriate use of testing agreements may be subject to unrelated business income tax.

Consideration should be given to the need for insurance. This is normally done on items greater than \$50,000 and approved by the General Counsel's Office.

Indemnification of Yale should be part of a Service Agreement.

#### 10.3 Material Transfer Agreements

Material transfer agreements (commonly called "MTAs") are agreements that set the terms on which proprietary materials are transferred by Yale to, or received by Yale from, another institution for use by designated persons in specified research protocols. Proprietary materials that are often transferred under an MTA include, for example, certain chemical compounds and genetically altered mice. MTAs address the scope of permitted use, publication, and the respective intellectual property rights of the

transferor and recipient. The terms of these agreements vary depending upon whether the materials are "incoming" or "outgoing" and whether the other party is an academic institution or a for-profit company. Hazardous materials and materials to be used in humans may be transferred under an MTA, but special conditions will apply. Researchers generally initiate an incoming transfer by obtaining a standard form from the transferring institution. Faculty members generally deal directly with GCA on MTAs. A faculty member who is receiving materials is often required to sign the MTA, in addition to the appropriate University office, which may be GCA or OCR. As with other agreements, an authorized institutional signature is required in addition to the signature of the PI/PD. GCA will consult with OCR and or the Office of the General Counsel for assistance in negotiating MTAs that pose unusual IP or other legal questions. Yale's established forms of MTA appear at

#### **MTAs**

[http://www.yale.edu/ocr/pfg/sample/ida\\_template.html](http://www.yale.edu/ocr/pfg/sample/ida_template.html)

<http://www.yale.edu/ocr/disclose.html>

<http://www.yale.edu/grants/mta/index.html>

#### **10.4 Industrial Affiliates Programs**

Industrial Affiliates Programs are supported by corporate gifts and, therefore, not considered sponsored programs. PIs/PDs interested in such programs should contact the Office of Development. Membership contributions vary from program to program but most offer member companies interaction with faculty and students and access to basic and applied research that supplements the company's own activities. Any Industrial Affiliates Programs that offer licenses to member institutions must contact the Office of Cooperative Research for drafting of a license agreement.

#### **10.5 Intergovernmental Personnel Act Agreements (IPAs)**

Intergovernmental Personnel Act (IPA) Agreements are contracts whereby a University employee may provide research, administrative or other services to a federal agency for a limited period of time. Some or all of salary and staff benefits are paid by the federal agency while the individuals are still considered University employees. The University must agree to employ an individual in the same capacity after his or her assignment. Contact GCA for further information.

#### **10.6 Confidential Disclosure Agreements (CDAs)**

CDAs (also called Non-Disclosure Agreements (NDAs)), are agreements under which one or both parties commit to keeping information disclosed to them confidential for a certain time and using it only for an agreed purpose. These are typically presented to OCR in connection with proposed licensing of University intellectual property. They may also be required in connection with a proposed research collaboration. They may be required before Yale investigators and colleagues enter into a research collaboration agreement in order to permit the parties to share proprietary research ideas on a preliminary basis. For additional information or review of CDAs, contact the appropriate GCA Office.

#### **10.7 Consulting Agreements**

Consulting agreements are private agreements entered into by the sponsor and the PI/PD. The agreements typically refer to external consulting work to be performed by the PI/PD for a sponsor. The following should be considered when evaluating a consulting agreement:

- Yale PI/PDs are limited to one day per week for external activities
- The terms of the consulting agreement are strictly between the PI/PD and the sponsor. Yale University is not involved or obligated in any way.

# Chapter 11

## Transfer Issues in Grant Administration

### 11.1 Policies and Procedures for when a PI/PD Leaves Yale University

The ability to transfer a sponsored project from Yale to another institution is dependent upon the regulations and policies of the sponsoring agency and those of Yale University. Policies vary widely between sponsors and the PI/PD is strongly encouraged to contact the appropriate GCA for specific information as soon as possible after deciding to move to another institution. There are four parties involved in any transfer request: the PI/PD, the original institution, the new institution, and the sponsor. Should the original institution decide not to nominate another PI/PD or to continue the project at the institution, and if the new institution is willing to undertake the administration of the project, the sponsor will usually agree to the transfer. Criteria for this decision include:

- Consideration of the time left on the project
- The amount of remaining funds
- What, if any, work will remain at Yale
- Whether the new institution has adequate facilities, equipment and staff

The PI should remember that equipment purchased on prior awards or competing segments of an award being transferred are the property of the University and may not be transferred to the new institution without specific permission for Yale and appropriate compensation for any cost sharing or alterations/renovations originally required to put the equipment in service.

#### 11.1.1 NIH Awards

NIH requires the submission of an "Official Statement Relinquishing Interests and Rights in a Public Health Service Research Grant," which signifies the original institution's willingness to terminate the grant and to relinquish all claims to any unexpended funds. The form indicates the proposed date of transfer and **estimates** the amount of funds that remain in the account. For specific instructions about transferring a NIH grant, see [http://grants.nih.gov/grants/policy/nihgps\\_2001/part\\_ii\\_a\\_5.htm](http://grants.nih.gov/grants/policy/nihgps_2001/part_ii_a_5.htm)

To transfer a Yale grant to a new institution, the following forms are required:

- Relinquishing Statement
- Final Invention Statement Forms and information can be found at: <http://grants.nih.gov/grants/forms.htm>.
- Final Effort Report

All requests must be routed through the departmental business office to GCA for review and processing. A proposal (PHS 398) must be prepared by the new institution and submitted to NIH.

To transfer a grant to Yale, the Relinquishing Statement is completed by the original institution and sent to NIH. The PI/PD must prepare a new proposal (PHS 398) at Yale for submission to NIH. The proposal must be routed through GCA as with all other proposals.

#### 11.1.2 National Science Foundation (NSF) Awards

A grant from NSF may be transferred to a new institution, with the approvals of the original and new institutions. The original institution completes the NSF Grant Transfer Request, estimating the amount of funds to remain at the date of transfer. Submitting the request constitutes agreement by the new organization to assume responsibility for completion of the project effort and to administer the grant (as originally awarded) from the transfer date to completion in accordance with applicable NSF terms and conditions. <http://www.nsf.gov/pubs/2002/nsf02151/gpm3.jsp#312.8>.

To transfer a Yale grant to another institution, the NSF Grant Transfer Request is completed in FastLane by the departmental business office. Access is allowed for GCA for review and submission to NSF. The Transfer Request is sent to the new institution, which will prepare a budget for the unobligated balance in the current year and any future committed years of the grant. The budget, a progress report and statement of work to be accomplished, plus appropriate certifications are sent to NSF by the new institution. To transfer a grant to Yale, the NSF Grant Transfer Request is completed by the original institution and sent to Yale via FastLane. The departmental business office prepares a budget for the unobligated balance in the current year and any future committed years of the grant. The budget, a progress report and statement of work to be accomplished are sent to GCA for review and submission to NSF, along with appropriate certifications.

### **11.1.3 Other Sponsors and Non-Transferable Awards**

Contact GCA for information specific to other sponsors. Some sponsors have their own forms, while others may require letters seeking approval for transfers. Timelines vary among organizations. Some awards are not eligible for transfer because they are dependent upon institutional resources (for example, training grants). Clinical trial agreements are also not transferable and must be closed out prior to the PI/PD leaving Yale.

### **11.1.4 Transfer and Disposition of Equipment**

Equipment purchased with University funds in whole or in part is the property of Yale University. Equipment purchased using funds from an external sponsor may belong to the University or to the sponsor depending upon the sponsor's regulations. Permission must be granted by the Provost's Office (for the Faculty of Arts and Sciences) or the Dean (for the Schools of Medicine and Nursing) for Yale-owned equipment to be transferred to a new institution.

#### **PI Handbook**

[http://www.yale.edu/provost/handbook/handbook\\_x\\_university\\_policies\\_concerni.html#T13](http://www.yale.edu/provost/handbook/handbook_x_university_policies_concerni.html#T13)

#### **University Policy 4209: Equipment**

<http://www.yale.edu/ppdev/policy/4209/4209.pdf>

### **11.1.5 Safety Considerations Upon Leaving Yale University**

If a PI/PD plans to leave Yale, the Office of Environmental Health and Safety (OEHS) should be consulted for guidance about the proper procedures for storing materials and equipment, transferring materials and equipment, and cleaning the lab.

#### **Office of Environmental Health and Safety**

<http://www.yale.edu/ehs/staff.htm>

## **Chapter 12**

### **Research-Related Resources at Yale University**

#### **12.1 Yale Libraries**

One of the great assets of Yale University is its Library System. In addition to the main collection in Sterling Library there are at least 25 other libraries and collections on campus. Many of these libraries have individual hours and different access, copying and borrowing policies.

In addition to the journals and volumes in its collection, the library now provides access to a number of electronic resources, with more than 3000 now available online. The

Library also offers access to a large number of electronic data bases in both the sciences and the arts. The Library offers assistance in searching for information through its many databases and offers classes in their effective use.

#### **Yale Libraries**

<http://www.library.yale.edu/libraries/>

<http://www.library.yale.edu/databases/>

#### **12.2 The Yale Center for Clinical Investigation**

The Yale Center for Clinical Investigation (YCCI), along with its institutional and community partners, is committed to promoting a central, novel and integrative environment for clinical and translational research at Yale. YCCI fosters the translation of disease-related discoveries from the laboratory into the clinic and then into the community to improve the care and outcome for patients locally and worldwide.

#### **The Yale Center for Clinical Investigation**

<http://ycci.yale.edu/>

#### **12.3 Animal Resources**

Yale University has a centralized, AAALAC accredited animal care and resource facility, the Yale Animal Resources Center (YARC), which is based at the School of Medicine. YARC provides housing and services at locations throughout the campus for certain animals used in research. Veterinary services are provided through the Section of Comparative Medicine. YARC operates multiple animal housing units and provides services for several hundred PIs.

PIs/PDs proposing large animal research should consult with YARC about appropriate arrangements. The Section of Comparative Medicine operates several biotechnology services for genetically modified animals including animal technology, transgenic mouse service (including generating, breeding and testing such animals), gene targeting, mouse phenotyping, and virology.

##### **YARC**

<http://info.med.yale.edu/yarc/index.htm>.

##### **Comparative Medicine**

<http://info.med.yale.edu/compmed/compmed/>

##### **YARC Biotechnology Services**

<http://info.med.yale.edu/yarc/biotechnology.htm>.

#### **12.4 Training/Training Management System (TMS)**

Yale provides opportunities for all members of the Yale community to meet training and form submission requirements. The Yale University Training Management System (TMS) is a University-wide system that manages information related to certain training and form completion requirements for University faculty and staff. TMS is designed to help better educate the Yale community about certain training and form completion requirements, facilitate online training registration, and ensure training completion.

The Learning Center at Yale offers a number of courses in personnel management. Attendance at one or more of these classes can assist PIs/PDs in learning how to hire the right people to do the job, to maximize productivity and minimize problems.

##### **TMS**

<http://www.yale.edu/training/>

#### **12. 5 Shop Facilities/Fabrication**

Yale has a number of facilities that provide the capability for fabrication of special equipment and materials, including machine shop facilities, service facilities for the production of nucleic acid primers, DNA/RNA fabrication, sequencing of nucleic acids and proteins.

<http://www.info.med.yale.edu/irds/ordering.html>  
<http://www.eng.yale.edu/project/>  
<http://www.seas.yale.edu/research-facilities.php>  
<http://www.info.med.yale.edu/wmkeck/>.

### **12.6 Other Facilities**

The Keck Laboratory Mass Spectrometry Resource, provides mass spectrometric support with more than 70 major instrument systems and is available to members of the Yale community. The Keck Facility recovers operating expenses from user fees.

#### **The Keck Laboratory Mass Spectrometry Resource**

<http://keck.med.yale.edu/>

The Center for Structural Biology Core Laboratory houses X-ray equipment and computational resources for macromolecular structure determination. CSB web pages provide user guides and worked examples for many of the software applications used in macromolecular structure determination, analysis and display.

#### **The Center for Structural Biology**

<http://www.csb.yale.edu/info>

The ESTU (Extended Stretched Trans Uranium) tandem accelerator is one of the largest operating electrostatic accelerators in the world.

#### **Tandem Accelerator**

<http://wnsl.physics.yale.edu/estu>

The Yale MRI Research Center imaging facilities contain laboratory and imaging space, with dedicated spaces for electrophysiological and psychological testing, for computing, and image and data analysis. It houses all research magnets and personnel in one contiguous facility. Arrangements for use of the facility must be made with the Yale Diagnostic Radiology Magnetic Resonance Imaging Research Center.

#### **MRI Center**

<http://mri.med.yale.edu/>

A Nuclear Magnetic Resonance (NMR) Facility is managed by the Department of Molecular Biophysics and Biochemistry (MB&B).

#### **NMR Center**

<http://mrrc.yale.edu/>

The Yale School of Forestry and Environmental Studies manages approximately 11,000 acres of forest land in Connecticut, New Hampshire, and Vermont. Faculty and students use the School Forestry as a laboratory for teaching, management and research.

#### **School of Forestry**

<http://www.yale.edu/schoolforest>

The Center for Cell Imaging (CCI) provides confocal microscopy, multiphoton microscopy, and computer workstations for image analysis.

**Center for Cell Imaging**

<http://www.cellbiology.yale.edu/ccmi/>

The PET Center, located at the VA Connecticut Healthcare System in West Haven, includes a cyclotron, a radiochemistry laboratory and a Siemens HR+ PET camera. Clinical imaging services are available for imaging of bone, cardiac, liver-spleen, brain, renal, thyroid and organ systems. FDG and other specialized positron emitters are used for research in imaging of metabolism and function with collaborators in other departments.

**PET Center**

<http://petcenter.yale.edu/>

## Quick Contact List

### Emergencies

Yale Police (Any Time) From Any

Phone.....432-4400

From a Yale Phone..... X111

OEHS (Office of Environmental Health & Safety) Business Hours.....785-3555

Facilities (Maintenance Emergencies)

Central Area..... 432-6888

Science Area..... 432-6888

Medical Area ..... 785-4620

Grants & Contracts

Pre-Award

YSM & Nursing .....785-4689

Central .....432-2460

Post-Award and Closeout.....436-4104

Institutional Review Boards (Human Investigation Committee)

YSM .....785-4688

YSN .....737-2420

FAS.....436-3650

Yale Animal Care & Use Committee .....785-5992

Yale Animal Resource Center.....785-2526

HIPPA Privacy Office.....436-3650

Conflict of Interest (COI)

Policy, questions & forms .....432-3233

Office of Cooperative Research (OCR)

Collaborations with non-Yale entities .....785-6165