Yale responds to a request for information on the administrative and fiscal burdens associated with Federal research grants and contracts oversight

On June 28, 2011 the National Institutes of Health published a Request for Information (RFI) offering the opportunity for both educational institutions and individuals to provide input on potential revisions to the Office of Management and Budget’s (OMB) Circular A-21, 2 CFR Part 220 (Cost Principles for Educational Institutions). The University provided commentary addressing the increased burden and costs associated with the administration of Federal research grants and contracts over the past decade resulting from the expansion of compliance requirements and the demand for more precise financial reporting. Yale’s letter touched on the need for greater flexibility in allocating costs across related awards, effort reporting reform, the need for simplified financial reporting, cost sharing, human subject protections, invention reporting and subrecipient monitoring.

A summary of responses to the RFI are expected to be published by September, 2011.

Yale faculty offer insights on NIH review criteria and grant preparation

Earlier this summer Yale members of the National Institute of Health’s (NIH) Study Section’s and Council’s gathered in two separate forums to offer their insights on the current funding environment as well as NIH’s new review criteria and application formats. The following is a synopsis of those discussions.

1. The NIH has 68 permanent Study Sections and 25 Special Emphasis Panels to review grant applications. One should not assume that all Study Sections and Panels are alike and therefore researchers should:
   - Review member rosters that are available online.
   - Determine and request assignment to a particular institute/study section if you think that there is a good fit.

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The NIH Office of Extramural Research (OER) has produced a new podcast that discusses what must be included in an application if vertebrate animals are included in the research? To hear the Writing Your Vertebrate Animal Section podcast, please click the following link: http://grants.nih.gov/podcasts/All_About_Grants/ and navigate to “Prepare a Successful Grant Application: Writing Your Vertebrate Animal Section.

- Contact appropriate program and scientific review officers for guidance in determining an appropriate panel.
- Get advice from experienced reviewers at Yale who might have experience with your study section.

2. Learn to think like a reviewer
- A reviewer must often read 10 to 15 applications and form an opinion about each application. Make a good impression by submitting a clear, well-written, properly organized application. This is more important than ever with reduced page limitations.
- Use the abstract to “sell” your idea as it may be the only section of the application a reviewer may read.

3. Significance, investigators, innovation, approach and the environment are the five criteria used by the NIH to determine scientific and technical merit.
- Be aware of the increasing emphasis on clinical impact and effects on clinical practice.
- Make sure the impact of the research described is addressed, the sustainability of the project, the talent of the team and how the project will impact the field of study.
1) Have a colleague or professional grant writer or editor read the proposal before submitting.
- Incremental science often does not get funded.
1) Seek innovative projects based on current work.

4. There are increasing numbers of different grant opportunities beyond the traditional NIH R01.
- Their use varies widely
- They can have higher (or lower) success rates than typical RO1s
- Do not be afraid to call the NIH to ask questions.

We would like to thank faculty who volunteered their time during the last academic year to participate in our funding/grantsmanship training programs. A link to future sessions is posted at the end of this Newsletter. If you are interested in a particular topic as a presenter or attendee, please send an email to melanie.smith@yale.edu.

On the horizon: IRES Proposal Development (PD)
All departments that support research at Yale now have access to the Integrated Research Enterprise System (IRES) Proposal Tracking (PT) module, the Office of Grant and Contract Administration’s (GCA) system used to capture proposal and award information. PT provides business department support staff with the ability to access “real-time” sponsored project information to respond to Principal Investigator (PI) inquiries.

The next IRES module to be implemented in support of the transformation of research at Yale, will be the Proposal Development (PD) module. PD is an integrated electronic environment for preparing, reviewing, approving proposals and in limited circumstances, direct system-to-system submissions.

In the future, PIs and business office staff will enter data directly into PD, and will be able to utilize PD for building scenario budgets, tracking effort commitments, and electronic routing and approval. Currently, the IRES team is working closely with administrators across campus in the development of PD which is being piloted by a small group of PIs this fall.

If you have any questions regarding IRES, please contact IRES@yale.edu.

Did you know that...
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The Office of Research Compliance and Education (ORCE) has posted two resources to assist investigators in preparing grant proposals that require a plan for the responsible conduct of research (RCR). The first is a table identifying formal Yale graduate school courses, online training, policies in support of RCR, seminar series, and publications from which a faculty member may review and/or select when developing an RCR program required by a sponsor. The second is template language for each resource identified. These resources take into consideration both the National Institutes of Health’s (NIH) and the National Science Foundation’s (NSF) requirements.

To view these resources click the following link: http://www.yale.edu/researchadministration/research/index.html#guidance

Investigators are reminded that an NSF RCR plan must state how a principal investigator/mentor will provide appropriate training and oversight to undergraduate students, graduate students and postdoctoral researchers participating in research projects.

A NIH RCR requirement applies to individuals at all stages of their career who participate in Institutional Training Grants, Individual Fellowship Awards, Career Development Awards, Research Education Grants, Dissertation Research Grants, or other grant programs as identified in the funding opportunity announcement.

Questions or comments regarding these resources can be sent to penny.cook@yale.edu.

**Did you know that...**

*The National Science Foundation (NSF) reinstated its original policy regarding the expectations of postdoctoral fellows during the three years they receive NSF funding? As in the past, Fellow’s are expected to devote full time to advanced scientific study. However, it is generally accepted that teaching or similar activity constitutes a valuable part of the education and training of many graduate students and that a Fellow may undertake a reasonable amount of teaching without NSF approval. It is expected that the furtherance of the Fellow’s educational objectives, not service to the institution, will govern these activities. Compensation for such activities is permitted in accordance with Yale policies.*

**Research Compliance Principles for Administrators – A new half day educational opportunity**

The Office of Research Compliance and Education (ORCE) has launched a new program addressing the principles of research compliance and the importance of ensuring compliance vis a vis the proposal submission and award acceptance processes. The curriculum provides the audience with the regulatory fundamentals of animal and human subject’s research, conflict of interest requirements, highlights environmental health and safety concerns, export controls laws, and sub-award requirements. This program is part of a continuing effort to help the business community support faculty to better understand University policies and the regulatory requirements for conducting research.

The program will be offered on a quarterly basis (see details below) and is open to both administrators and faculty alike. Administrators, however, must complete the Fundamentals of Research Administration prior to registering for this program.

**Did you know that...**

*The NIH has clarified its funding strategies for FY 2011 grant awards? Strategies by Institute have been posted at http://grants.nih.gov/grants/financial/index.htm#strategies.*
Upcoming Research Administration Training/Educational Events

Funding/Grantsmanship Training Programs:
- **Show Me the Money: Searching for Research Funding Using Internet Databases and Email Alerts**
  Date: August 24, 2011
  Time: 3:00 PM – 4:30 PM
  Location: Bass Center, Room 305

Fundamentals of Sponsored Projects Administration (offered monthly)
  Date: September 13, 2011
  Time: 8:30 – 4:00 PM
  Location: 47 College Street, Room 212A

Research Compliance Principles for Administrators (offered quarterly)
  Dates: September 19, 2011
  Time: 8:30 AM – 1:00 PM
  Location: 47 College Street, Room 212A

Additional Training For Faculty And Administrators

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

Grant and Contract Administration (GCA)
- Hands-on Clinic – Grants.gov
- Fundamentals of Export Controls (web-based)

To learn more or to register for the above educational opportunities with the exception of Sponsored Projects Training for Faculty, visit [http://www.yale.edu/training/](http://www.yale.edu/training/). (Follow link to GCA and GCFA Training and then to Funding/Grantsmanship Training Programs).

To learn more or register for Sponsored Projects Administration Training for Faculty (web-based) visit [http://www.yale.edu/training/](http://www.yale.edu/training/). Navigate to Office of Research Administration Training and click Courses.