Departmental Research Administrators Workgroup (DRAW)

February 21, 2012
deMarneffe 132
Agenda

- Announcements
- NIH Cap Adjustments
- Partners Internal Consulting Policy
- Farewell to Angie Cheng, Research Finance
Announcements

Milestone Billing

- Starting March 1\textsuperscript{st}, the Partners Billing Team will begin invoicing milestones to industry sponsors.
- Foundations is not part of this project scope.
- Purpose: improve cash flow from industry sponsors
Announcements – PCRO & RVL

- **Industry Sponsored Clinical Trial Agreements**
  We work through PCRO (Partners Clinical Research Office)- see “McL-PCRO Contract Process” on the Research Intranet / Industry Sponsor Clinical Research
  PCRO Contact: Patricia Cone

- **Industry Sponsored Pre-Clinical Agreements**
  We work through RVL (Research Ventures & Licensing)-
  RVL Contact: Anne Ritter
  Anne is onsite every Monday
Announcements- InfoEd PD

InfoEd PD Roll-Out

- We would like to have as many people as possible trained in the next month because the March 5th, 2012 NIH deadline will be used as a “Pilot testing” for all those submitting proposals.

- Following the March 5th NIH deadline it is critical that everyone receive InfoEd PD training because starting May 25th, 2012 100% of all new research proposals sent to Research Administration will be required to be developed, reviewed, and approved within the InfoEd PD application (excluding RVL and PCRO proposals).
Announcements – InfoEd PD

Upcoming training sessions:

- 02/24 or 03/02 from 9:30-11:30 am - de Marneffe 132 conference room
- Link below provides information about documentation, an alternative training option and the PD Resource Center which is a discussion board for commonly asked questions related to using PD:

# NIH Notices Issued 01/20/12

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New Grant Proposals</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Level II</td>
<td></td>
<td>$179,700</td>
</tr>
<tr>
<td>Inflation</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Categorical Budgets (Detailed Budgets)</td>
<td></td>
<td>$179,700</td>
</tr>
<tr>
<td><strong>New &amp; Competing Awards as of 12/23/11</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modular</td>
<td></td>
<td>$179,700</td>
</tr>
<tr>
<td>Budget Unchanged by NIH</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Non-Competing Awards as of 12/23/11</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Level II</td>
<td></td>
<td>$179,700</td>
</tr>
<tr>
<td>Budget Unchanged by NIH</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

References:
NIH Cap Example

- See attachment
<table>
<thead>
<tr>
<th>PI Name</th>
<th>Institutional Base Salary</th>
<th>NIH Awards</th>
<th>Old % Salary Distribution</th>
<th>Start Date</th>
<th>End Date</th>
<th>Project Dates</th>
<th>Old NIH Cap (Budgets &lt; 12/23/11)</th>
<th>New NIH Cap (Budgets &gt;= 12/23/11)</th>
<th>$Salary Distribution on NIH Award</th>
<th>% Effort</th>
<th>$Salary Distribution on NEW NIH Cap</th>
<th>NEW % Salary Distribution</th>
<th>% Effort if $ Salary Remained Unchanged (NEW NIH Cap)</th>
<th>Difference between OLD &amp; NEW Salary on NIH Award</th>
<th>Salary Variance + Fringe @ 32%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jones</td>
<td>$225,000</td>
<td>400000</td>
<td>15.00%</td>
<td>09/01/02</td>
<td>08/31/12</td>
<td>Yes</td>
<td>0.00%</td>
<td>199,700</td>
<td>$199,700</td>
<td>$199,700</td>
<td>$179,700</td>
<td>$20,000</td>
<td>$5,633</td>
<td>$7,436</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>433333</td>
<td>25.00%</td>
<td>08/01/06</td>
<td>07/31/13</td>
<td>Yes</td>
<td>8/1/2012</td>
<td>$56,250</td>
<td>28.17%</td>
<td>$50,817</td>
<td>22.50%</td>
<td>31.30%</td>
<td>$5,633</td>
<td>$7,436</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>455555</td>
<td>5.00%</td>
<td>09/06/07</td>
<td>08/31/12</td>
<td>Yes</td>
<td>No</td>
<td>$11,250</td>
<td>5.63%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peterson</td>
<td>$192,000</td>
<td>411111</td>
<td>50.00%</td>
<td>02/01/11</td>
<td>11/30/15</td>
<td>Yes</td>
<td>12/1/2012</td>
<td>$96,000</td>
<td>50.00%</td>
<td>$89,650</td>
<td>46.80%</td>
<td>53.42%</td>
<td>$6,150</td>
<td>$8,118</td>
<td></td>
</tr>
</tbody>
</table>
Policy on Internal Consulting on Research Grants & Contracts

Lunch & Learn – 1/18/12

Mary H. Mitchell
Partners Research Compliance
Policy Overview

- **Who:** Partners Medical/Professional staff (physicians) and Ph.D. scientists who serve as “internal consultants” (IC) on a grant, cooperative agreement, or contract.
  - HMS rank of Instructor or above for BWH, MGH, McLean & SRH.

- **What:** Provide professional advice or clinical or research service without measurable effort commitment.

- **When:** Minimal time commitment
  - Within the same department
  - Across two departments within same hospital or two hospitals

- **Where:** Prior approval
  - Federal awards
  - Non-federal awards
  - Industry awards

- **How:** Payment as supplement to Internal Consultant’s (IC) salary.
  - *No one may be paid as an IC and employee under the same award.*
The devil is in the details....

- If consulting activity is across two hospital departments or two hospitals
  - Service may not be a new, creative endeavor
  - Consultant may not be responsible for design, conduct or reporting of research.

- If consulting activity is within the same department.
  - All of the above but service must also be
    - Well-defined
    - Different from activities of Co-I & department staff devoting effort to the project

- Time commitment
  - Minimal: short-term, non-reoccurring, no measurable effort
  - Above & beyond usual duties: no interference
The devil is in the details….

- **Consulting Fee**
  - **All Sponsors**
    - Compliant with T&C’s and state or federal requirements
    - Included in the application/proposal budget at time of submission
    - Prior approval by Internal Consultant’s Chief in advance of initiating activity.
    - Paid as a supplement to the IC’s salary after the work has been completed
  - **Federal Awards**
    - All of the above **AND**
    - Consistent w/individual’s current salary and NIH salary cap or other federal salary limitation
  - **Non-federal Awards**
    - All of the “all sponsors” requirements **AND**
    - Reasonable: based on the consultant’s qualifications in line w/market rates for the services provided **AND**
    - Consistent with the individual’s current salary.
Substantive Work (SW)

- **Definition**
  - Project activities with specific aims that constitute a significant portion of the research program and require the leadership and direction of a responsible investigator and a quantifiable (i.e., measurable) effort commitment from this individual and any other individuals required for the project.

- If activity is considered SW and is across two Partners hospitals
  - Not internal consulting
  - Handle as subcontract

- If the activity is considered SW but is within one Partners hospital
  - Not internal consulting
  - Include in budget with effort commitment
Exceptions Will be Considered

- Written requests to Sr. VP for Research.

- Must be approved by Internal Consultant’s Chief.

- Must be submitted to Sr VP prior to the IC commencing work and include a detailed justification.
Pre-Award Procedures for Federal Awards, & Non-Federal: Foundations & Not-for-Profits

- Funding request must be included in budget
- Detailed budget justification
  - Identify consultant’s position at hospital
  - Indicate hourly rate
  - Include statement that payment will be supplement to salary
  - Explanation why consultant rather than Co-I or other role with effort commitment
- PI’s responsibility to include in materials sent to RM
  - IC Chief’s Approval
  - Statement from IC describing scope and how the projected hours will be in addition to his/her regular duties
- All documents uploaded to InfoEd
Post-Award Procedures for Federal Awards, & Non-Federal: Foundations & Not-for-Profits

- Upon receipt of PS account number, PI responsible for providing IC with a signed letter of commitment outlining activity, hourly rate & reporting and invoicing requirements.
- If unexpected need for IC identified after award has been made.
  - PI works with Post-Award GA to revise budget and secure sponsor’s approval.
  - PI is responsible for submitting all pre-award documents to Post-Award GA.
  - Approval must be obtained prior to IC commencing work.
PCRO Procedures for Industry Awards
Supporting Clinical Trials

- **Pre-Award**
  - PI works with PCRO and assembles all documents identified for federal, foundations, and not-for-profit awards

- **Post-Award**
  - When the contract has been fully executed, the PI is responsible for providing IC with signed letter of commitment outlining
    - Activity
    - Budgeted rate
    - Reporting & invoicing requirements

- All documents uploaded to InfoEd.
Recap

- **Who:** Partners Medical/Professional staff (physicians) and Ph.D. scientists who serve as “internal consultants” (IC) on a grant, cooperative agreement, or contract.
  - HMS rank of Instructor or above for BWH, MGH, McLean & SRH.

- **What:** Provide professional advice or clinical or research service without measurable effort commitment.

- **When:** Minimal time commitment
  - Within the same department
  - Across two departments within same hospital or two hospitals

- **Where:** Prior approval
  - Federal awards
  - Non-federal awards
  - Industry awards

- **How:** Payment as supplement to Internal Consultant’s (IC) salary.
  - *No one may be paid as an IC and employee under the same award.*
Questions/Discussion and Identification of Allowable Internal Consulting Activity
Let’s Celebrate

FAREWELL TO ANGIE CHENG!
Questions?
Contact

Raquel Espinosa
Phone: 617-855-2868
respinosa@partners.org
respinosa@mclean.harvard.edu