

Other Support: Procedures

Procedure Sections

- Procedure Statement
- Reason for Procedure
- Who Should Know These Procedures
- Contacts
- Applicable WMC Policies and Procedures
- Applicable Federal Regulations
- Other Support Overview
- Roles & Responsibilities
- Definitions

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Responsible College Officer
Director, Grants & Contracts

Responsible Office
Grants & Contracts

Procedure Statement

Other Support encompasses all financial resources that support a Principal Investigator's (PI's) research, including research grants, cooperative agreements, and contracts, but not including training awards, prizes, and gifts. In conformance with Weill Medical College of Cornell University (WMC) policy, departments and faculty should be prepared to follow "just-in-time" procedures to submit current Other Support information upon notification from NIH that the proposal score is within a fundable range.

NIH uses just-in-time procedures for certain programs and award mechanisms. These procedures call for a reduced amount of information to be submitted with applications at the time of proposal and allow for a possible NIH request for additional information, including information concerning Other Support, when the application is under consideration for funding. Just-in-time procedures reduce the administrative burden on the application process for proposals that do not get funded.

Reason for Procedure

As a recipient of federal funds, WMC must comply with the standards set forth by the federal government concerning the appropriate reporting of Other Support information. This document is based on interpretation of these federal regulations. It is important to note that materially misrepresenting Other Support information or failing to provide Other Support information could subject WMC to be liable under the False Claims Act or other fraud statutes. Both the PI and the Institutional Official certify that the grant application, including just-in-time submissions, contain true, complete, and accurate information. To the extent that an applicant's misrepresentation of Other Support information prevents an agency from recognizing overlap, it is conceivable that federal officials would deem the entire award invalid.

Who Should Know These Procedures

- Dean
- Senior Administration – Vice Provosts, Associate Deans
- Director, Department Chair, Division Head
- Faculty

- Departmental/Divisional Administrators
- Finance Personnel – Research Accounting, Accounting Services
- Grants & Contracts Personnel
- Research Compliance Personnel
- Research Integrity Personnel
- All Employees
- Information Technology Personnel
- Human Resources Personnel
- Students

Contacts

Subject	Contact	Phone	Email
Policy questions	Amy Zier	(212) 821-0949	aaz2001@med.cornell.edu
Institutional research compliance issues	Barbara Pifel	(212) 821-0722	blp2001@med.cornell.edu

Applicable WMC Policies and Procedures

- *Effort Reporting: Policy*
- *Effort Reporting: Procedures*
- *Proposal Development, Processing and Submission: Procedures*

Applicable Federal Regulations

NIH Grants Policy Statement

NIH PHS 398 Application Guidelines

OMB Circular A-21

Other Support Overview

NIH requires the submission of complete and up-to-date Other Support information before an award can be made. Other Support includes all financial resources, whether Federal, non-Federal, commercial or institutional, available in direct support of a PI's research endeavors. Other Support information includes all active and pending sources of support. Pending support includes proposals that are currently outstanding. Other Support also includes all research endeavors for which the key personnel are involved even if they are not receiving or requesting salary support. For example, if a PI is committed to 5% effort on a grant but is not receiving salary support from the sponsor, she still must list this 5% effort in other support documentation.

- **Note:** *Many researchers are engaged in multiple industry-sponsored clinical trials, most of which require very little effort or time on the part of the researcher. It may be difficult to measure precisely the effort associated with each of the clinical trials because the effort amounts are generally so small and because they vary greatly depending on the phase of a particular trial. A*

PI may question whether it is necessary to include in his list of Other Support dozens of clinical trials in which he spends less than 1 percent of effort in any given time period. Nonetheless, NIH makes it clear that in order to comply with the reporting requirements for other support, PIs must include such clinical trials in their list of funded research endeavors. One way of doing so without listing each individual project is to report aggregate effort on the industry clinical trials as a group. This approach appears to be acceptable to NIH, as long as the aggregate effort does not exceed 10 percent. To do so, the PI should list each clinical trial sponsor separately and provide an explanation as to why he has determined it is best to report his involvement in an aggregate form.

Applicants should not include information on Other Support in the PHS 398 competitive grant application submission, but should be prepared to follow "just-in-time" procedures to submit current Other Support information upon notification from NIH that the proposal score is within a fundable range. The NIH will directly notify the PI if any just-in-time documentation is required. Grants & Contracts will also receive just-in-time notification and will send a follow-up communication to the PI.

Grants & Contracts, as well as NIH, will review the information on Other Support to identify and resolve potential overlap of support. Overlap, whether scientific, budgetary, or commitment of an individual's effort greater than 100 percent, is not permitted. The goals in identifying and eliminating overlap are to ensure that: there is no duplication of funding for scientific aims, specific budgetary items, or an individual's level of effort; only funds necessary to the conduct of the approved project are included in the award; and sufficient and appropriate levels of effort are committed to the project.

Scientific overlap occurs when: (1) substantially the same research is proposed in more than one application or is submitted to two or more different funding sources for review and funding consideration, or (2) a specific research objective and the research design for accomplishing that objective are the same or closely related in two or more applications or awards, regardless of the funding source. Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salary) are requested in an application but are already provided for by another source.

Commitment overlap occurs when a person's time commitment exceeds 100 percent, whether or not salary support is requested in the application. While information on Other Support is only requested for key personnel, no individuals on the project may have commitments in excess of 100 percent. At the time of award, the PI will work with Grants & Contracts and the sponsor to resolve any effort distribution issues. It may be necessary for the PI to make adjustments and reduce level of efforts for other commitments. If the researcher decides to reduce participation on other commitments to meet the requirements of a new award, the PI must submit a revised Personnel Action Form (PAF) to Finance in order to reflect these changes. The PI is also primarily responsible for notifying any additional sponsors of effort adjustments if appropriate.

Given that most faculty members have responsibilities for teaching, administration, or patient care, it is typically not feasible for them to charge 100 percent of their salary or certify 100 percent of their effort to sponsored research. In general, faculty members will not be permitted to charge or certify 100% effort to sponsored research activities. Rare exceptions to this may include faculty who have no other teaching, clinical, or administrative responsibilities. At the proposal stage, department administrators and faculty must review proposed sponsored effort to assure that what is proposed is feasible considering other activities required of the faculty member. Department administrators and faculty must also review the faculty member's certified effort statement to ensure it accounts for all activities. On a case-by-case basis, the Assistant Dean for Research Compliance will review the justification for exceptions and the effort commitments of highly committed faculty and will consult with the Executive Administrative Compliance Coordinating Team.

After any overlap or other commitment issues have been resolved, Grants & Contracts will review and approve the just-in-time documentation. If in hard-copy format, the PI should submit the Other Support documentation to Grants & Contracts for review, and upon approval, the PI directly submits the documentation to the sponsor. If in electronic format, the PI is primarily responsible for uploading just-in-

time Other Support to the NIH through the NIH Commons. The Grants & Contracts office will then review and electronically submit Other Support for the PI.

Roles & Responsibilities

Responsibilities	PI	Dept Admin	Dept/Div Chair	G&C Office
Notified by sponsor when proposal in fundable range and requires IRB, IACUC, and updated Other Support documentation (Just-In-Time Procedure)	P			O
Sends follow-up communication to PI regarding JIT documentation needed				P
Submit JIT forms and cover letter (if hard copy) to G&C Office	P	S		
Review and approve cover letter and JIT documentation				P
Submit JIT documentation to sponsor, if in hard copy format	P	S		S
Submit JIT documentation to sponsor through the NIH Commons, if in electronic format	S	S		P

KEY
P = PRIMARY RESPONSIBILITY
S = SECONDARY RESPONSIBILITY
O = INSTITUTIONAL OVERSIGHT
O - L = LOCAL OVERSIGHT
I = PROVIDE INPUT

Definitions

Term	Definition
Actual Effort	The time that an employee actually devotes to a particular sponsored project (including time pledged to a sponsor as Mandatory or Voluntary Committed Cost Sharing) or other WMC activity, expressed as a percentage of Total Effort.
Committed Effort	The amount of effort proposed in a grant or other project application and accepted by a sponsor, regardless of whether salary support is requested for the effort. For example, if an NIH grant application proposes that an employee will devote 30% of his or her effort to the grant, with salary support for 10% of effort, the Committed Effort for that employee is 30%.
Just-In-Time (JIT)	Application timeframe that requires applicants to send some information to NIH only if an award is likely. Just-in-time is used for Other Support information and other items, including: certification of IRB approval, Federalwide assurance, IACUC certification, and letter stating that key personnel have been trained in protecting human subjects.
Other Support	All financial resources, federal, non-federal, commercial, or institutional, that support a principal investigator's research, including research grants, cooperative agreements, and contracts, but not including training awards, prizes, and gifts.
Sponsored Project	An externally funded activity that is separately budgeted and accounted for and governed by specific terms and conditions. Sponsored projects must be separately budgeted and accounted for subject to terms of the sponsoring organization. Sponsored projects may be in the forms of grants, contracts, or cooperative agreements for research, instruction, and public service activities.
Total Effort	<p>The effort that the employee devotes in the aggregate to the professional activities for which he or she receives IBS compensation from WMC. Specifically excluded from Total Effort is time spent on (a)** Faculty Practice activities through the Weill Cornell Physician's Organization for which supplemental compensation coded "612x" is received from a "9" account, and (b) outside consulting activities or other activities for which compensation is received from an entity other than WMC.</p> <p>**It is important to note that this does not include any "fixed" supplemental income, which must be included in computing "total effort".</p>