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Documentation and Instructions: ISMMS as a Subaward on a Sponsored Project Application

Introduction

The purpose of this memo is to inform you of the required documentation you will need to provide to the prime institution and to the GCO when ISMMS is a subaward on a sponsored project application as well as the pertinent extramural and internal policies and procedures. It also includes information specific to NIH competitive applications. The terms "sub-award" and "sub-recipient" are used interchangeably. The memorandum is organized in the following sections:

The sections in this memo highlighted in yellow are instructions on placement of documentation in InfoEd.

Please contact your assigned GCO Grants Specialist for any questions you may have. For a listing, please click here:

I. Documentation

<u>Prime Institution</u>

Please obtain instructions regarding any documents and information the prime institution will require. The GCO will provide a Statement of Intent regardless of whether or not the prime institution requires.

GCO requests that you upload the <u>instructions</u> you receive from the prime institution in your InfoEd application > Internal Documents tab.

Below are documents that the prime site may require.

1. Statement of Intent to Establish (SOI) a Consortium Agreement – *ISMMS prepares and signs this statement*
2. Statement of Work (SOW) for new/competitive and non-competitive applications, or Confirmation of No Change for non-competitive applications and no cost extensions
3. Budget for new/competitive and non-competitive applications
4. Budget Justification for new/competitive applications

<u>ISMMS GCO</u>

Any documents that the prime institution requests from you, you must also submit those to the GCO as part of your InfoEd application. GCO always requires #2 – 4 for new/competitive and non-competitive applications as specified above. GCO also requires the following documents:

5. Proposal Sections related to ISMMS's participation or a Progress Report

For competitive applications, you only need to include sections of the proposal related to ISMMS' participation if the SOW does not adequately provide information on your participation. Please see the instructions in Section III. for additional information.

For non-competitive and no cost extension applications, include a progress report.

<u>NIH Competitive Applications</u>

The prime institution may also request these additional documents for NIH competitive applications:

6. Certification of Compliance with HHS Federal Conflict of Interest (COI) rules and regulations effective 8/24/2012 – *This COI certification is <u>already</u> included in ISMMS's SOI.*
7. ISMMS' Performance Site Information
   Institution Name, Address, Country, DUNS #, Congressional District
8. Resources and Facilities page, including equipment
9. Biosketches for Key Personnel including Other Significant Contributors and Consultants
10. Letters of Support
11. Inclusion Enrollment Report data for projects with human subjects, if applicable

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II.   Checklist: ISMMS as a Subaward on a NIH Competitive Application

This checklist for NIH competitive applications is a tool designed to assist the ISMMS Subaward PI and his/her research team with the following tasks:

1. Obtain the administrative and budgetary information you will need from the prime institution such as the project period dates, budget amount, funding opportunity announcement information, their deadline for submission of your materials, and the documentation the prime institution needs.

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2. Submit all required information and documents to the prime institution.

The checklist entitled "NIH Competitive Subaward Checklist: ISMMS as the Subawardee" can be downloaded here.

To use, complete the appropriate sections of the checklist and forward it to your contact at the prime institution with the required documents.

Your InfoEd application is due to the GCO in COMPLETE AND FINAL form, including completed and signed Conflict of Interest and Suspension and Debarment forms as appropriate, 1 business day prior to the prime institution's deadline for your materials.

If you use the checklist, please upload it into your InfoEd Ed > Internal Documents tab.

III. Additional Instructions
1. **Statement of Intent (SOI) to Establish a Consortium Agreement**
This Statement of Intent is also commonly referred to as "Subcontracting Letter of Agreement," "Consortium Letter of Intent," and "Letter of Commitment or Intent Signed by the Consortium Participant" among other variations. The SOI is the official letter signed by your designated GCO Authorizing Organization Official (AOR) attesting that ISMMS is aware of all applicable Federal regulations and policies and will establish a subaward agreement. **Failure to obtain a signed SOI may result in the prime institution removing ISMMS from the project.** GCO only issues the SOI after review and approval of your InfoEd application so please be sure to submit your application.

Also, please note that the actual signing of the subaward agreement by the Prime Institution and ISMMS will occur at a later date if the project is funded.   This statement does not take the place of the agreement.

Although standard practice is for the GCO to prepare and sign this form, some PIs/Departments opt to complete and include it in the InfoEd application for ISMMS AOR signature. The template is available on line at:
http://icahn.mssm.edu/research/portal/resources/gco/application
Then go to > Forms > "Subaward Statement of Intent Template: ISMMS as the Sub-Awardee Institution"

This template is only used for NIH sponsored projects and other HHS agencies, such as AHRQ, CDC, FDA, HRSA, SAMHSA, which are listed on the Federal Demonstration Partnership (FDP) website and abide by the Federal COI policy revised 8/24/12.

If you complete the SOI form for GCO AOR signature, please include it in your InfoEd application > Internal Documents tab.   Choose the "Subaward Statement of Intent to Establish a Consortium Agreement" category.

2. **Statement of Work (SOW) or Confirmation of No Change**
For competitive applications, include a SOW.

For non-competitive and no cost extension applications, include a SOW or confirmation statement from the ISMMS Subaward PI that there is no change.

The confirmation document can be a memo or a sentence in the Progress Report from the ISMMS Subaward PI stating, "I confirm there is no change to the Statement of Work."

A Statement of Work is a description of the work the sub-awardee institution will perform. The SOW will be part of the legally binding subaward agreement if the project is funded. There is no template since it is project specific. The document at a minimum should include the objective or purpose of ISMMS' participation and a general description of the actions to be performed by ISMMS and the expected results.

Please include the SOW or confirmation in your InfoEd application > Internal Documents tab. Choose the "Subaward Statement of Work" category.

If the confirmation is part of your progress report, please upload your progress report in your InfoEd application > Progress Report tab.

3. **Budget**
GCO requires as much budget information and documentation as the prime institution requests. Also please consult with your department's administration for other internal requirements and procedures.

Fringe and Indirect Cost Rates
When you are preparing a budget, you must find out the funding source from the prime institution. It is the funding source that determines whether you use ISMMS' federal or non-federal fringe benefit rate and ISMMS's federal, non-federal (non-profit), or industry indirect cost rates.

For example, if you are working with an academic medical center on a clinical research project and the medical center will receive funding from a pharmaceutical company, you would use the non-federal fringe rate and the industry sponsored clinical trial indirect cost rate on your budget. If you are working with an academic medical center on a clinical research project and the medical center is applying for a Department of Defense grant, you would use the federal fringe and indirect cost rates on your budget.

For a list of ISMMS' fringe and indirect cost rates and additional budgeting instructions, please click here.

Application Types
   a. Competitive Applications
      As stated above, GCO requires as much budget information and documentation as the prime institution requests. In the case of NIH modular grants, at a minimum, the InfoEd budget must include all personnel, other direct costs, F&A, and total costs for the initial and entire proposed period of support.

    ii.   Rationale for changes, or

    iii.   A statement that the continuation protocol is not different from the original protocol.

Upload the proposal sections into the "Research or Program Plan" tab for new projects and the progress report in the "Progress Report" tab for all others.

NIH Competitive Applications: Additional Documentation
Numbers 6 – 12 below are additional instructions for NIH competitive applications.

6. **Certification of Compliance with HHS Federal Conflict of Interest (COI) rules and regulations effective 8/24/2012**
The appropriate statement attesting to ISMMS' compliance is included in the SOI the GCO signs.

7. **Performance Site Information**
The prime institution will need to enter ISMMS' name, address, country, DUNS number, and congressional district number on the NIH Application. The "Checklist" in section II above includes this information.

8. **Resources and Facilities page**
The NIH instructions state, "If there are multiple performance sites, describe the resources available at each site." Provide an additional equipment statement, if applicable. "List major items of equipment already available for this project and, if appropriate identify location and pertinent capabilities."
Upload the Resources and Facilities page in InfoEd> Research or Program Plan tab.

9. **Biosketches for Key Personnel including Other Significant Contributors and Consultants**
As per the NIH instructions, please provide a biosketch for senior/key personnel and other significant contributors.
Upload the Biosketches in InfoEd> Research or Program Plan tab, Personnel tab, or Internal Documents tab.

10. **Letters of Support**
As per the NIH instructions, "Obtain appropriate letters of support, including any letters necessary to demonstrate the support of consortium participants and collaborators such as Senior/Key Personnel and Other Significant Contributors included in the grant application. Letters are not required for personnel (such as research assistants) not contributing in a substantive, measurable way to the scientific development or execution of the project. Letters should stipulate expectations for co-authorship, and whether cell lines, samples or other resources promised in the letter are freely available to other investigators in the scientific community or will be provided to the particular investigators only. For consultants, letters should include rate/charge for consulting services and level of effort/number of hours per year anticipated. In addition, letters ensuring access to core facilities and resources should stipulate whether access will be provided as a fee-for-service."
Upload the Letters of Support in InfoEd> Research or Program Plan tab or Internal Documents tab.

12. **Inclusion Enrollment Report Data for projects with human subjects, if applicable**
If the Inclusion Enrollment Report (IER) form is required for your research, the prime institution may request data from you so they can include on the NIH Inclusion Enrollment Report form.

Upload the document with the information in InfoEd> Research or Program Plan tab or Internal
Documents tab.

13. **Multiple PI/PD Leadership Plan, if applicable**
If this is a multiple PI (MPI) grant and the ISMMS Subaward PI is one of the MPIs, please include the MPI
plan with your InfoEd application.
Upload the MPI plan in InfoEd> Research or Program Plan tab or Internal Documents tab.

14. **Data Entry on InfoEd Budget and Personnel tabs**
Enter the budget in InfoEd > Budget tab and the personnel in InfoEd > Personnel tab.

You can data enter the budget and personnel in its entirety or follow the shortcut instructions in the table below.

Data Entry on InfoEd Budget and Personnel tabs	
Budget Tab Instructions Enter the following budget information in "Budget Items":	**Personnel Tab Instructions** Enter the names of the following personnel:

1. All personnel **with % effort, fringe and salary $s requested**
 	
2. When the funding source is <u>federal</u>, you must itemize the following costs and choose the appropriate "Budget/Charge category":
  a. Equipment (defined as equal to or greater than $1,500)
  b. Equipment Software (defined as equal to or greater than $1,500 and non-renewable)
  c. Patient Care Costs (choose outpatient or inpatient)
  d. Tuition & Fees
  e. Other Costs>Genomic Arrays
  f. Graduate Student Direct Compensation
  g. Graduate Student Health Insurance
 	
3. Cumulative Direct Cost (DC) - Enter one <u>cumulative</u> amount combining all Other than Personnel Costs into "Other Costs."
4. <u>Upcoming</u> year's budget only
	1. All personnel including TBN positions and paid consultants.

Costs 2 a. – e. above are excluded from overhead on federally sponsored projects. They must be
itemized as specified above for the InfoEd program to correctly calculate F&A. For federal projects with
genomic arrays, you will need to manually enter the F&A.

Regarding costs 2 f. and g., do not enter salary and fringe amounts for graduate students participating
on your project. Do enter costs as noted above. Please remember that you still need to enter the
graduate student's name in the Personnel tab of InfoEd.

15. **Participation as a Subaward on a Subaward**

The GCO discourages Mount Sinai's participation as a subaward on a subaward. This occurs when the prime institution submitting the application issues a subaward to a sub-awardee institution, who then in turn, issues a subaward to a third tier institution. Mount Sinai's participation either as: 1) a third tier institution, or 2) as a second tier institution that issues a subaward, will add unnecessary bureaucratic burdens as well as administrative and financial delays to your project. The GCO understands that the desire to use subawards on subawards is often driven by scientific reporting lines. These scientific reporting lines can be preserved without adding extraneous institutional financial and administrative reporting lines. The direct subaward arrangement between the prime institution and Mount Sinai expedites both the research project as well as the receipt of funds. Please contact your designated Grants Specialist if you have any questions.

16. **NIH Application Instruction Guide**

Refer to SF424 Application Guide for complete instructions on the NIH sections included above.

IV. Significant Changes to this Document from Prior Versions

Date	Description
11/6/23	Added statement that the GCO will provide a Statement of Intent regardless of whether the prime institution requires.
6/22/20	Removed sIRB Reliance Statement, if applicable, in Section III.11. No longer required for competitive applications due 5/25/20 or later.
3/22/18	Added sIRB Reliance Statement, if applicable, in Section III.11.
3/22/18	Updated the Inclusion Enrollment Report data requirement, if applicable, in Section III.12.
4/11/16	Added information about "PHS 398 Inclusion Enrollment" form for applications with dues dates 5/25/16 and later in Section III.12.
4/11/16	Updated the equipment and equipment software threshold from $500 to $1,500 in section III.13
4/11/16	Added Participation as a Subaward on a Subaward section III.14