

Office of Research Administration

Updates and Navigation of the SUNY Downstate Process

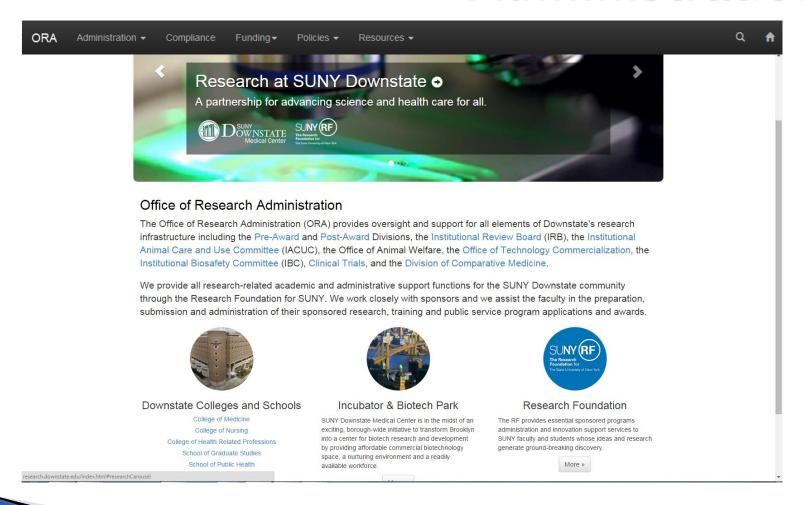


We want to help you navigate





Office of Research Administration





Office of Research Administration

- Animal Research Involves the following offices:
 - Pre-Award Division
 - Post–Award Division
 - IACUC
 - IBC
 - DCM
- We all work to facilitate your research endeavors in different ways.



Goals

- Provide an update on the grant management and compliance system.
- Provide clarification of the overall process.
- Better understand what we need to accomplish the process as a team - PI, Pre & Post-Award Division, IACUC, OAW, IBC, DCM.
- Efforts to Reduce Regulatory Burden
 - Revised Vertebrate Animal Section (VAS) for submissions to NIH
 - Improve efficiency by submitting IACUC protocols for projects that receive a favorable score.
 - Perform grant congruency only when required.
 - Working to transition the requirement for the Annual Review to USDA-species protocols only.
- Protect the PI by ensuring financial compliance once funds are awarded.

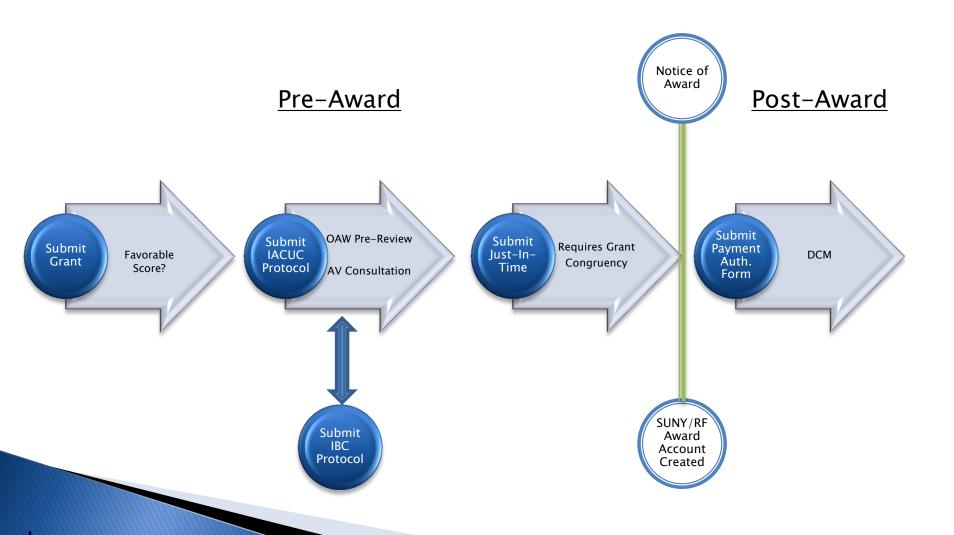


Quick Update

- RF purchased a grant management and compliance system with 6 modules.
- The expectation is that there will be module integration within the system.
- All 32 campuses are working together to harmonize processes for implementation.
- More information will become available as the process moves forward.

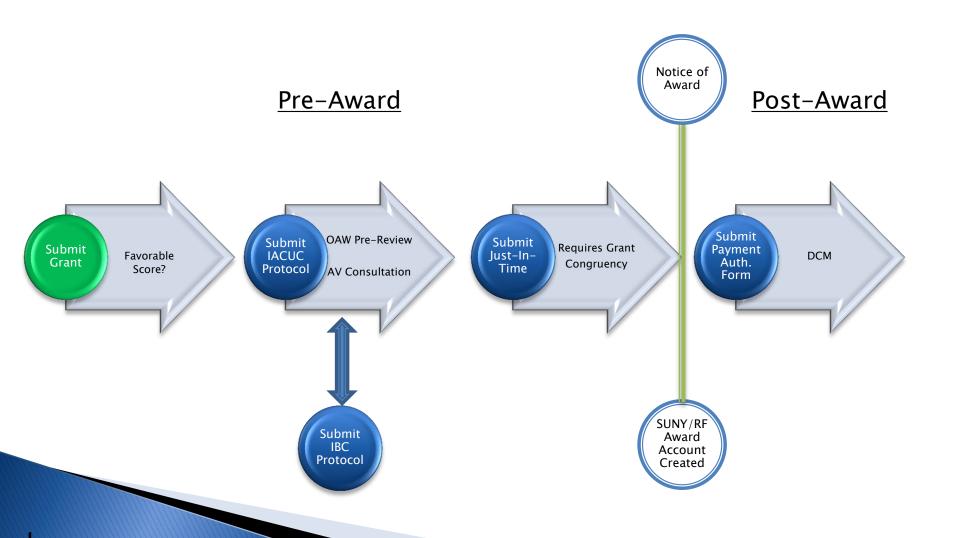


Process Overview





Process Overview





Grant Submission

- Revised Vertebrate Animal Section (VAS) for Grant Submissions to the NIH
- Anticipated Implementation Dates
 - All but Fellowship/Training Grants: 1/25/16
 - All Types: 3/25/16
- ▶ NOT-OD-16-006: **Summary of Changes**
 - A description of veterinary care is no longer required.
 - Justification for the number of animals has been eliminated.
 - A description of the method of euthanasia is required only if the method is not consistent with AVMA guidelines.

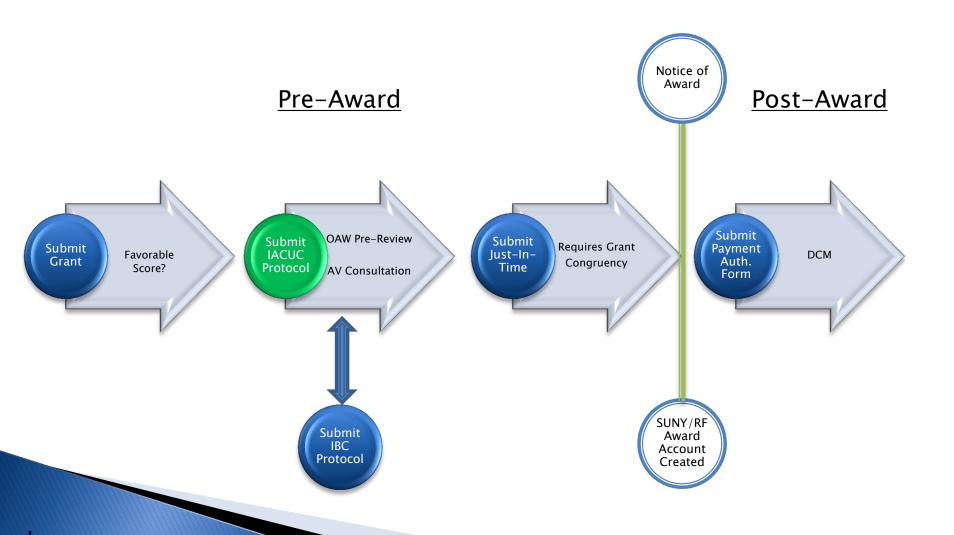


Grant Submission

- Year 1 grant submissions -
 - If you have an approved IACUC protocol the PI will provide the IACUC approval date they believe is appropriate for the grant.
 - If you do not have an approved IACUC protocol the grant will be submitted with status of IACUC approval as 'pending'
- The PI will coordinate with OAW to verify congruency.
- Having IACUC approval at time of submission does not impact your grant score or chances of being funded.
- The PI is the only recipient of the grant score. Pre-Award Division is not notified.



Process Overview





IACUC Protocol

When to submit?

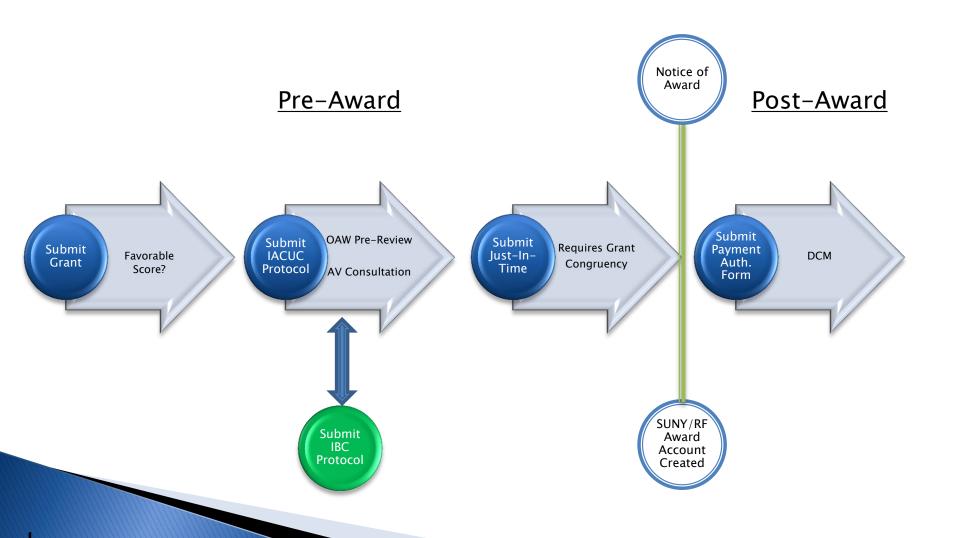
- Before submitting the grant...
- After submitting the grant, but before you receive any feedback...
- After submitting the grant, but before you receive the score...
- If your score is favorable...
- *Contact OAW to discuss what is needed for your specific situation before writing a new protocol.

IACUC Review & Approval

- OAW Pre–Review
- AV Consultation protocols with category D/E
- IACUC Full Committee Review



Process Overview





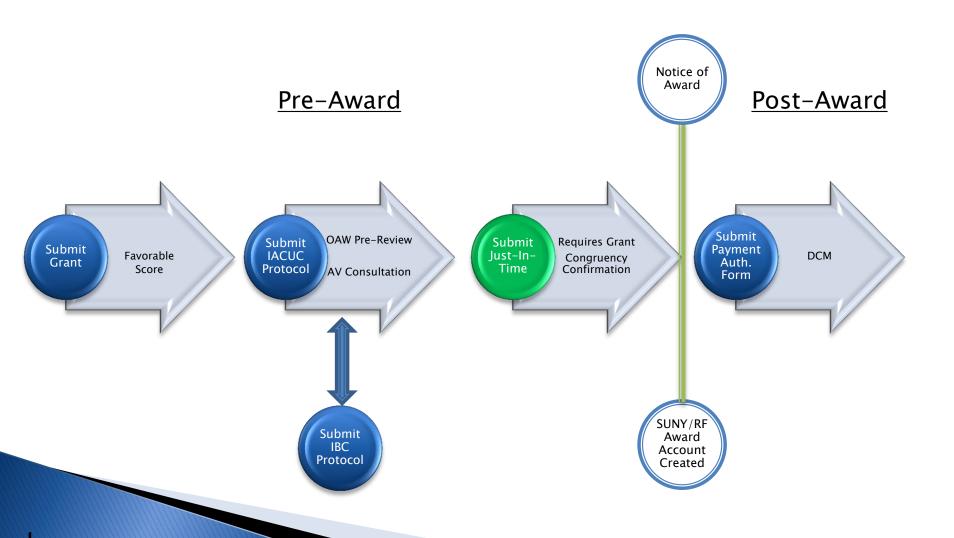
IBC Triggers

Release of IACUC Approval is tied to IBC Approval of the following items:

- Use/Creation of Non-exempt Transgenic Animals
- Administration of the following to animals:
 - Radioisotopes/Ionizing Radiation
 - Infectious Agents
 - Recombinant DNA
 - Toxic/Hazardous Substances



Process Overview





Just-In-Time (JIT)

- NOT-OD-12-101
 - Revised JIT Business Processes: "Beginning April 20, 2012, applications receiving an impact score of 40 or less will receive a standard notice and request for submitting JIT information. This level reflects NIH's new Impact Scoring system and current tightened paylines, though it does not reflect any individual IC's payline."
 - NIH, NSF, HRSA, AHRQ funded research
- IT email notification is sent to the PI +/- Pre-Award Division depending on the funding source.
- At notice of JIT, PI needs to notify the IACUC & provide grant information to perform grant congruency.
- You have at least 45 days to submit, but funding Institute requests may vary.



- What is it?
- Why is it needed?
- How is it accomplished?
- Why should it be separate from the IACUC protocol review & approval process?



What is it?

- A state of agreement between the research described in the grant and the associated IACUC protocol(s).
- Species, experimental design, procedures, etc.
- Why is it needed?
 - Contractual obligations
 - Institution with the NIH to meet the terms of the Grants Policy Statement (Part II, Terms & Conditions)
 - PI with the Institution to meet the requirements of PHS Policy
 - Financial Compliance Ensures that the research to be funded is congruent with IACUC approved protocols.



Responsibility

- Institution Prior to award:
 - Must ensure that the information the IACUC reviews and approves is congruent with what is in the grant application/proposal.
 - When the Institution provides the IACUC approval date, the funding agency considers this verification of congruency.
- PI and Institution:
 - To notify NIH of any IACUC required modifications
 - To notify NIH of any changes in scope after award
 - PI to notify the IACUC of changes in scope as a result of NIH review



Change in Scope

- The grantee must make the initial determination of the significance of the change and should consult with the Grants Management Officer of the NIH funding component as necessary.
- Change in specific aims approved at the time of award
- Substitution of one animal model for another
- Change from the approved use of live vertebrate animals
- Shift of the research emphasis from one disease area to another
- NIHGPS Part II: Subpart A:8.1.2.5



Change in Scope?

YES

PI, through the Authorized Organizational Representative (AOR), contacts NIH Grants Management Officer (GMO) to obtain approval of change

*grant congruency performed

NO

PI provides explanation that institution may file with congruency review documentation *grant congruency not performed



- How is it accomplished?
- One-way comparison
 - What is in the grant, needs to be in the protocol.
 - The protocol can contain additional work such as pilot studies.
- PI receives JIT notification
- ▶ PI contacts <u>IACUC@Downstate.edu</u> with
 - Grant Information
 - PI
 - Title
 - Grant #
 - Documents: Specific Aims, VAS, possibly others
 - Protocol Information
 - PI
 - Title
 - Protocol #



- How is it accomplished? continued…
- OAW will perform the congruency review between the identified grant and protocol(s) within 3 business days.
- If congruent:
 - A congruency letter is created and emailed to the PI and the Pre-Award Division.
 - Approval date of the associated protocol is submitted with JIT.
 - Any IACUC modifications that were required to secure approval also will be detailed in the letter.



Sample Congruency Letter



Office of Animal Welfare IACUC@Downstate.edu office 718-270-4645

CONGRUENCY REVIEW

IACUC Protocol Information:

Principal Investigator Protocol Number Protocol Title

IACUC Approval Dates

- Initial
- Annual Review #1
- Annual Review #2

Funding Source Information:

Principal Investigator Funding Source Grant Number Grant Title

The above referenced documents were reviewed and found to be congruent on <<INSERT DATE OF REVIEW>>.

<<IF NEEDED>> The IACUC required the following modifications to the protocol, which differ from what is described in the grant:

*Federally funded projects require that congruency be confirmed prior to award and with any subsequent changes in scope.

*Changes in scope:

- Change in the direction, type of research or training from the aims, objectives, or



- How is it accomplished? continued…
- If not congruent:
 - OAW will communicate the details to the PI.
 - Depending on the details
 - A separate protocol may be needed (for a different species).
 - A protocol amendment may be needed to address the non-congruent item(s).
 - An explanation may be sufficient if, for example, subsequent procedures will be based upon initial results.



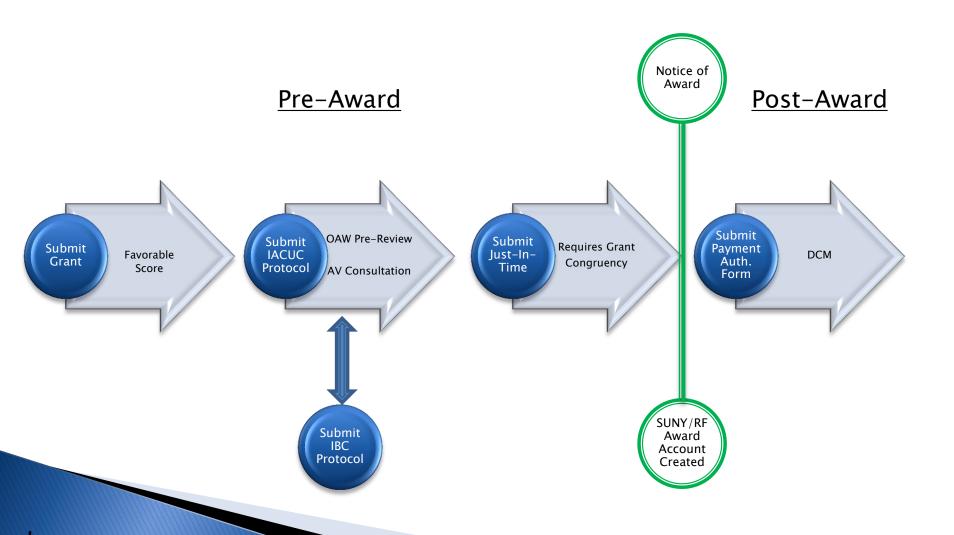
- How is it accomplished? continued…
- Once the details are resolved, making the grant and protocol(s) congruent:
 - A congruency letter is created and emailed to the PI and the Pre-Award Division.
 - Approval date of the associated protocol is submitted with JIT.
 - Any IACUC modifications that were required to secure approval also will be detailed in the letter.
 - Any explanations also will be detailed in the letter.



- Why should it separate from the IACUC protocol review & approval process?
 - Grant and protocol review cycles are not always in sync.
 - 3-year renewal of protocol: non-competing grant renewal
 - Currently approved protocol: competing grant renewal this requires a congruency review with the new grant submission.
 - Funding sources change when grants close/expire.
 - Funding sources change when new funding is obtained e.g., departmental support to grant funds.
 - Will capture changes in scope that occur independent of the IACUC protocol review cycle.
- Downstate's revised process will be independent of IACUC protocol submission and review to facilitate the overall of the process.



Process Overview



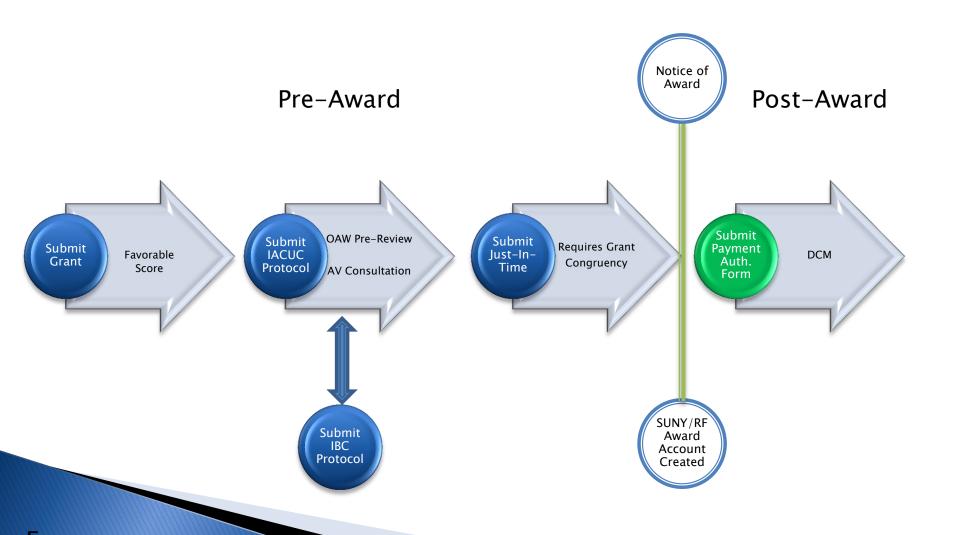


Award & Account # Creation

- Pre-Award Division
 - Reviews compliance requirements (e.g., IACUC approval, COI)
 - Issues institutional approval to RF Central (RFC) to create the award and account # for receipt of funds.
- RFC communicates the account # to Pre/Post-Award
- Pre/Post-Award communicate the account # to the PI.
- Award numbers are also available to PIs in Oracle.



Process Overview





Payment Authorization Form

- PI completes and submits the Payment Authorization Form to communicate the award # to the IACUC & DCM.
- What do you do when an award expires?
 - Complete a new Payment Authorization Form & submit to the IACUC & DCM for subsequent charges related to animal research.
 - Post-Award Division meets with your Departmental Grant Manager to capture all expenditures for the award before it is closed.



Post-Award Division

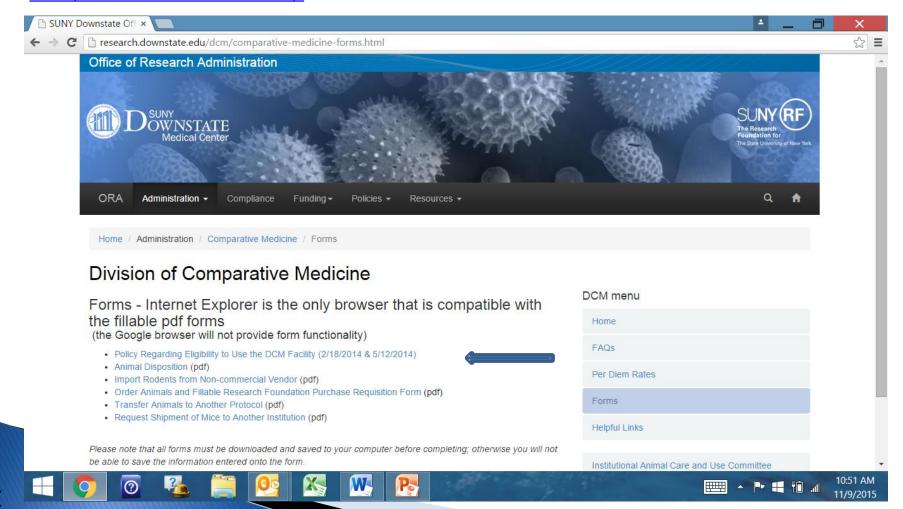
- Financial Compliance
- Expenditures are to be:
 - allocable,
 - accountable, and
 - appropriate.
- RPM3.0 will allow for the association of multiple accounts to a single protocol. This provides flexibility but also increased PI responsibility to ensure expenditures are appropriately allocated.
 - Future Town Hall to review this process in detail once RPM
 3.0 is tested and available for use.
- Any association with a new account requires submission of a payment authorization form
- FYI Cost transfers are only allowed for expenses incurred within the previous <u>90</u> days.



- DCM is currently the only "specialized service facility" (SSF) on the Downstate College of Medicine campus
- A SSF is defined by the Federal Government as an operating unit established for the primary purpose of providing complex or specialized service to a select group of users (the educational and research community) rather than the general campus community.
- DCM is subject to the terms and conditions of Federal OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 CFR 200), Section 200.468.



DCM Service Center http://www.rfsuny.org/Information-For/Service-Centers/





DCM operates in accordance with cost principles of the OMB Uniform Administrative Requirements, Section 200.468 (2 CFR 200) which states:

 "The costs of such services, when material, must be charged directly to applicable awards based on actual usage of the services on the basis of a schedule of rates or established methodology."



RPM (Colibri Solutions LLC) - why it's use is important

- Designed to be compliant with U.S. Federal Government guidance on how to operate service centers
 - Cost Analysis and Rate Setting for Animal Care Facilities
 Provided by The National Center for Research Resources
 (NCRR) at the National Institutes of Health (NIH).
 - AAALAC accreditation 2008 required Downstate to implement computerized protocol and animal use tracking records
 - Campus service centers have come under increased scrutiny in Federal audits. RF Central conducts enhanced monitoring.



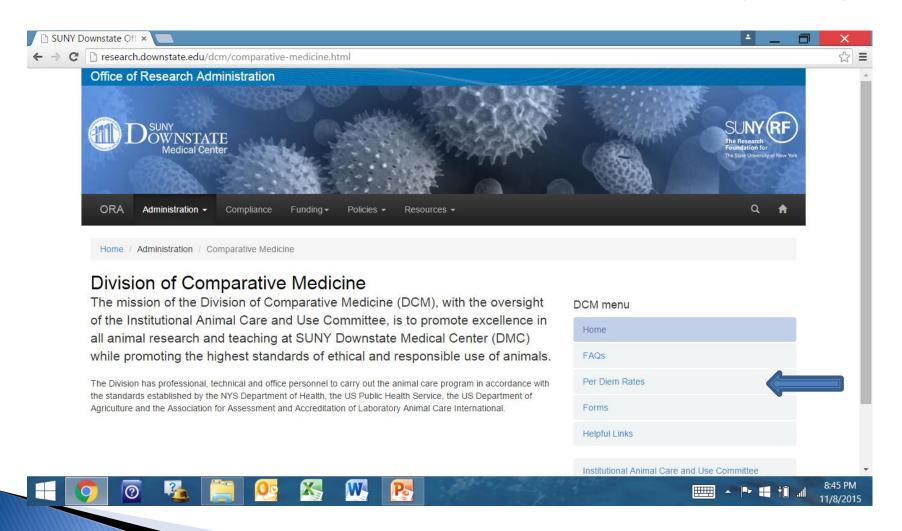
The Division of Comparative Medicine (DCM)

RPM (Colibri Solutions LLC) - why it's use is important

- Designed to be compliant with U.S. Federal Government guidance on how to operate service centers
 - Tracks all SSF charges incurred directly to individual protocols and linked award:
 - animal purchases, per diem and technical charges, and drug/supply purchases
 - Tracks all DCM expenses for annual cost analysis
 - Provides fully integrated and real time info to PIs 24/7
 - Breeding tracking software available to PIs -no charge
 - Electronic animal ordering and technical services requests
 - Wireless use to be implemented in facility
 - RF Central and AAALAC accreditation robust reviews: RPM provides detailed, thorough and transparent financial compliance

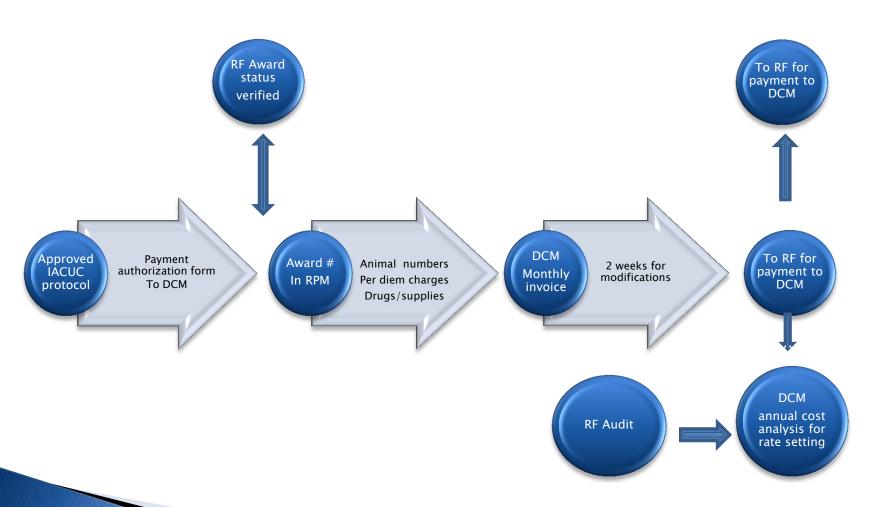


The Division of Comparative Medicine (DCM)



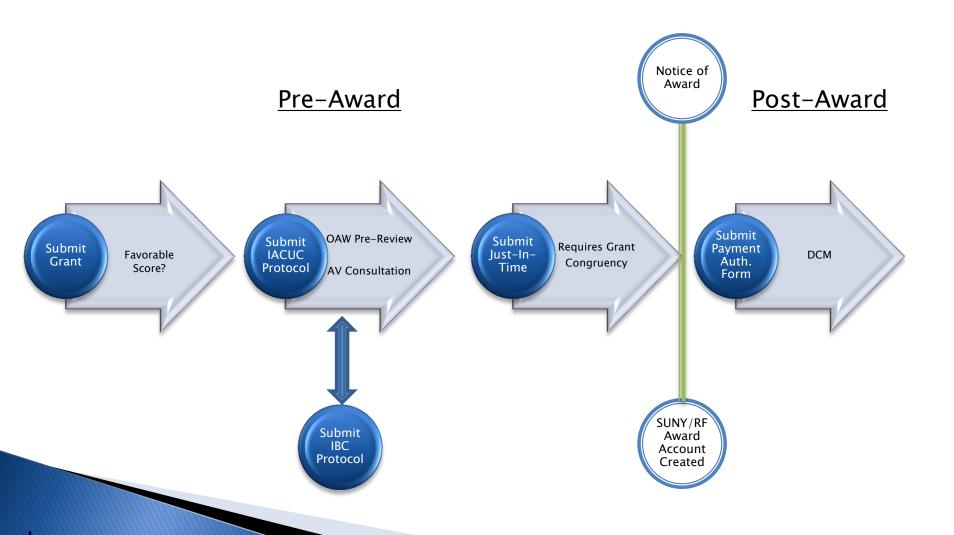


DCM Business Process Overview





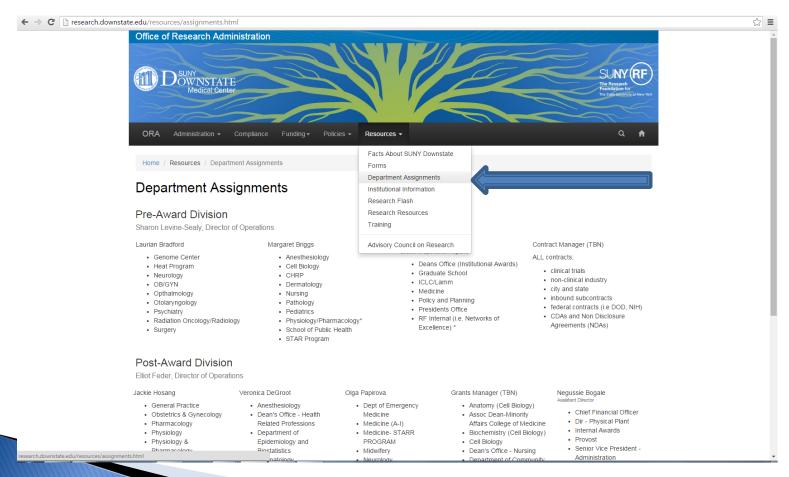
Process Overview





Who To Contact

Pre & Post-Award Division





Who To Contact

Pre-Award Division

- http://research.downstate.edu/resources/assignments.html
- researchgrants@downstate.edu
- · Ms. Sharon Levine-Sealy, Director

Post-Award Division

http://research.downstate.edu/resources/assignments.html

Mr. Elliot Feder, Director

IACUC

- · IACUC@Downstate.edu
- Dr. Diana Dow-Edwards, IACUC Chair
- · Dr. Julie Sharp, OAW Director
- · Ms. Lydia Bailey, IACUC Coordinator

IBC

- IBC@Downstate.edu
- · Dr. Haseeb Siddiqi, IBC Chair
- · Ms. Lydia Bailey, IBC Coordinator

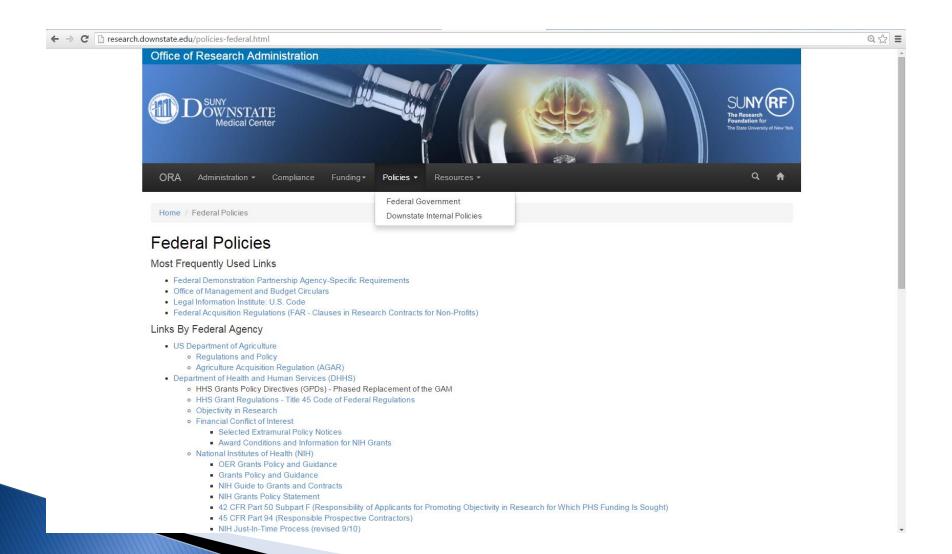
Grant Congruency

· IACUC@Downstate.edu

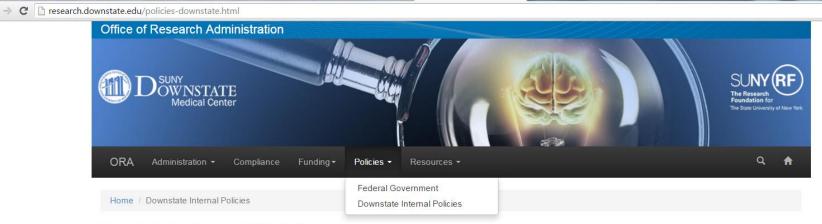
DCM

- · RPM access/questions Ms. Rachel Bryson or RPM@downstate.edu
- · Payment authorization/award updates and invoices Mr. Ron Cohen
- · Dr. Carol Novotney, Director









Downstate Internal Policies

Below are a set of research-related policies approved by Downstate's Advisory Council for Research.

- · Cost Sharing Policy »
- · Conflicts of Interest Policy »
- . Direct Costing Policy »
- . Effort Reporting Policy »
- · Institutional Base Salary Policy »
- · Institutional Review Board Policy and Procedures Manual
- Scientific Misconduct Policy
- Service Center Policy »



- Vertebrate Animal Section
 - NOT-OD-16-006
 https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-006.html
 - VAS webpage <u>http://grants.nih.gov/grants/olaw/vertebrate_anim</u> al_section.htm



IACUC & IBC Approval

- NOT-OD-11-053 <u>http://grants.nih.gov/grants/guide/notice-files/NOT-</u> OD-11-053.html
- Brown, P., Gibson, C. A word from OLAW and USDA. *Lab Animal (NY)*. 40, 295–298, (2011).

Grant Congruency

The relevant sections/specific links will be included in an email attachment for future reference.

- NIH Grants Policy Statement (Part II Terms & Conditions)
- PHS Policy
- OLAW FAQs D10, B13, D20
- OLAW Grants Policy & Congruency, 2012 Webinar



Authorized Payment Form:
http://research.downstate.edu/_pdf/iacuc/PaymentAuthorizationform.pdf



Questions?

