GW SPH RESEARCH OPERATIONS GUIDELINES:
Grant and Contract Proposals and Awards

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Office of Research Excellence

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This handbook is a reference guide for Milken Institute School of Public Health investigators and research administration staff. It provides an overview of processes to submit proposals and administer research awards for both the School and the University and touches on key areas that are crucial to conducting research. PIs are encouraged to first contact the departmental administrators or the department’s Office of the Vice President for Research (OVPR) representative when needing sponsored project information or assistance. In addition, the School’s Office of Research Excellence, including the Associate Dean of Research (ADR) and the Senior Research Operations Director are additional resources for PIs and administrators.

There are several steps that must be followed to identify a potential funding opportunity, to process and submit a proposal to a sponsor (pre-award), and to manage a grant once funded (post-award). Multiple individuals within the various departments, the School, and the University have responsibilities for each step in the process. The following guidance is intended to lead investigators through the key processes of proposal and grants management.

I. Levels of Responsibility
A. Principal Investigator
A Principal Investigator (PI) as defined in the GWU Sponsored Projects Handbook “…is a regular or research faculty member, Research Scientist, Senior Research Scientist, or Senior Research Staff Scientist.” Faculty members are encouraged to seek clarification from department chairs if they are uncertain as to their faculty status. A PI Eligibility Exception Request, such as for postdoctoral fellows or temporary faculty can be submitted by the investigator through the Departmental Chair and ADR to OVPR. OVPR makes the final determination for eligibility exceptions on a case by case basis.

As soon as a PI makes a decision to apply for a sponsored project, s/he should inform the Department Chair and the Administrative Manager (or other administrative staff per Department policy) so that appropriate resources and support are allocated. PIs who intend to submit large, complex grant proposals (e.g., for Centers, Program Projects, or other multi institutional initiatives) should also notify the Associate Dean of Research as early as possible. When a student is indicated as PI (such as for a dissertation grant) s/he must also have a GW faculty member noted as the internal PI of record.

In terms of pre-award responsibilities, the PI prepares the technical narrative and drafts the budget to support the proposed activity. The PI also identifies the need for subcontracts, collaborators, and additional space or funding requirements. In certain circumstances, the PI should discuss needs (e.g., space, data storage, data security) with the Associate Dean of Research in advance of preparing the proposal. The PI must approve all proposal forms and required regulatory forms as prepared by the assigned grants administrative staff, and confirm that the proposal conforms to a sponsor’s technical and administrative requirements as prepared by the administrative staff. As a part of post-award management, the PI is responsible for the overall management of the scientific, technical, financial, compliance, and administrative aspects of the sponsored research program in accordance with relevant federal and/or sponsor regulations, university policy and the Faculty Handbook. This includes preparing technical reports, monitoring sub-awardee performance, and maintaining communication with the Office of the Vice President of Research (OVPR) and the School of Public Health (SPH) administrative staff on all fiscal and personnel matters.

B. SPH and Department Sponsored Project Staff (Local Administration)
Staff in the Dean’s Office and across departments comprise ‘Local Administration.’ Local administration includes positions such as department managers, finance administrators, and other staff that function in various roles in pre- and post-award management processes. In the pre-award phase, duties range from having primary responsibility of task completion, giving approvals for certain tasks or processes, or providing...
support or consultation for tasks or processes. Specific responsibilities may include preparing budgets; completing and compiling sponsor GW-required forms; and submitting the proposals, among other administrative tasks. During post-award phases, responsibilities may include submitting programmatic and financial reports, monitoring sub-awardee financial performance, acquiring and providing background documentation to support requests for purchase order creation, processing Procurement Credit Cards (PCards), processing encumbrances and clearing transactions. **All faculty have designated points of contact for grants management.** Refer to list of “Points of Contact”.

C. Office of the Vice President for Research Staff
The SPH has specific points of contact in OVPR. Refer to “Points of Contact” on the SPH Research Resource Portal for the most current list. Their duties range from having primary responsibility of task completion, giving approvals for certain tasks or processes, or providing support or consultation for tasks or processes. Specific responsibilities during pre-award phases include tasks such as reviewing and approving proposals; prequalifying sub recipients; submitting proposals; and negotiating/accepting the terms and conditions of the award. Post-award responsibilities include tasks such as establishing sub-award agreements, preparing financial reports, and closing out awards. Refer to the OVPR website for additional information.

D. Grants and Contracts Accounting Services (GCAS)
GCAS is responsible for post-award accounting including financial close-out activities pursuant to the Award Management Closeout Policy. GCAS prepares and submits financial report and invoices to sponsors. GCAS also provides the risk assessment for subrecipients and assists in subrecipient monitoring. PIs work closely with their designated departmental administrator and OVPR SPA to coordinate post-award activities with GCAS.

II. Pre-award Processes
A. Locating Funding
SPH investigators may explore potential funding sources using a variety of resources (e.g., http://www.grants.gov). The SPH’s Research Office, Office of Research Excellence, also provides extensive resources on its ongoing, interactive **Research Accelerator Blog** hosted by the Associate Dean of Research. Funding alerts are posted weekly to the blog. **All faculty are registered to the Blog by default. But, we encourage all faculty to register with GW’s PIVOT service.** The Office of the Vice President for Research provides this subscription-based service with more than 25,000 funding opportunity records. PIVOT develops a draft of the professional profile for all GW faculty. You simply log in and claim your profile at http://pivot.cos.com. Claiming your profile will unlock additional services, such as tailored searches, lists of potential collaborations here at GW and elsewhere, and it will also maintain up-to-date publication listings. If you need help with PIVOT, please contact Laura Walker in OVPR (alwalker@gwu.edu). OVPR provides additional resources for locating **funding**.

B. Determining Proposal Types
The SPH supports and encourages a diverse portfolio of proposals, including:

- **Solicited Proposals** are submitted in response to a particular program announcement or request for proposal. The sponsor seeks proposals in a certain area with specific deadlines, guidelines and requirements for proposal preparation and submission. These proposals are usually, but not exclusively, associated with federal agencies and the US DHHS.

- **Unsolicited Proposals** are initiated by a faculty member without a specific request from the sponsor. However, they are usually aligned with broad sponsor missions or focus areas. The proposals are often associated with private organizations and foundations. Most of these sponsors have general requirements for submission of unsolicited proposals.
• Invited Proposals are specifically directed to faculty by the sponsor, and are often related to prior work or relationships with between the PI and the sponsor. They usually focus on the PI’s unique capabilities. These solicitations typically include foundations or other private organizations. Read more below on “Award-proposal combinations.”

GW provides distinct guidance on the difference between gifts and grants. In addition, GW provides guidance on various types of funding mechanisms.

C. Pre-routing Essentials

• Engaging grants management staff
It is very important for a PI to contact the designated departmental grants administration staff as early as possible. Early engagement of staff increases the likelihood that your proposal routing and submission will go smoothly. The SPH Office of Research Excellence (ORE) maintains a list of SPH Sponsored Projects Staff Points of Contact. Note: This list is subject to change so be sure to verify contacts with your department administrator and also confirm any other pre-routing requirements established by your department.

• Full scientific review of proposals and copy editing+
The SPH offers provisions for comprehensive scientific reviews of proposals. As part of the Faculty Research Development Program, the school offers “Mentor Match.” Mentor Match is designed for investigators to partner with an expert in his or her field for the purpose of having a critical scientific review. This preliminary critique can be instrumental in the development of the proposed project. Ideally, the process will evolve into a collaborative research relationship between the PI and the mentor. OVPR may also provide scientific reviews through the Research Enhancement Unit—the same lead-time applies to these internal reviews. Arrangements also can be made for copy edit review of proposals.

• Locating biostatistics support and other resources
The SPH has an invaluable resource in the Biostatistics and Epidemiology Consulting Service (BECs) which is embedded in the GWU Department of Epidemiology and Biostatistics. BECS provides biostatistical, epidemiological, and study design support for health-related research projects. Currently, pre-award services are available free of charge to our investigators, but it is important that you plan ahead and contact the BECS director, Dr. Sam Simmens (simmens@gwu.edu) promptly upon decision to prepare a proposal. Also, the SPH provides investigators numerous templates and resources through the Research Resources Portal including proposal checklists, document templates, and facilities and resources sections, among other grant writing resources.

D. Routing Proposals
GW requires faculty, staff, and student PIs to route all proposals for external funding through the following internal levels for review and approval prior to submission:

• PI and all co-investigators
• Division and Department for each PI and co-Investigator
• School for each PI and co-Investigator
• OVPR

Currently, routing is facilitated electronically through GW’s Cayuse system. Cayuse 424 is a web-based application used to create, review, approve, and submit grant proposals. Cayuse routing applies to all new, continuation, renewal, revised, and supplemental grants for research, training, fellowships or other proposals for all types of external research funding sources, including governmental, nonprofit, commercial, or private foundations. Investigators are encouraged to review additional guidance on OVPR’s website. GW’s routing process involves review and approval of all proposals at the level of the departments (chairperson), the Schools, and OVPR. The SPH requires that PIs adhere to routing procedures and timelines. No proposal,
regardless of the type, can be negotiated with a sponsor or awarded without going through the routing process and OVPR.

The role of the Dean’s Office in routing (specifically the Associate Dean of Research) includes the following:

- Confirming the individual's eligibility to be a Principal Investigator
- Determining the proposed project alignment with the SPH-wide strategic plan/mission
- Assessing the proposed commitment of effort, space, equipment, and other resources committed
- Approving any funds committed as cost sharing
- Ensuring the proposal conforms to SPH policies and sponsor guidelines
- Confirming budget accuracy of GW of faculty, staff, and student salaries, fringe benefits, and F&A
- Reviewing sub agreements and other collaborator/consultant budgets

Key elements of the routing process:

- **Timeline (OVPR 5-day submission deadline)**

  Proposals should be submitted to SPH Dean’s Office through Cayuse prior to the OVPR 5-day deadline to allow for review and approval from the Associate Dean of Research. A complete and final application must be routed, using Cayuse, to OVPR no later than 9:00 a.m. 5 business days prior to the sponsor deadline. Approvals must be granted by the Chair and the Associate Dean of Research before it is further routed to OVPR for final approval. It is important to underscore that when proposals reach the level of approval by the Associate Dean of Research non scientific sections of the applications must be fully completed. Near final draft of proposal technical narratives are acceptable for review upon routing process. OVPR strictly reinforces this directive which is detailed in the faculty handbook.

Complex projects, such as program project or center grants, require a longer review period. PIs should contact the Associate Dean of Research to assure that the appropriate timeline and adequate resources are arranged for these types of applications. Plan accordingly to be sure that department administrators also have enough time to meet the OVPR 5-day deadline. These requirements facilitate positive workflow and efficiency that foster not only the quality of the PI’s proposal but the SPH’s overall research culture, productivity, and credibility. The required timeline for internal routing ensures that proposals receive adequate compliance review and head off potential problems negatively affecting the application. See additional guidance at from OVPR.

**NOTE:** Minor modifications to the final proposal scientific narrative may uploaded into Cayuse and accepted by OVPR Sponsored Projects no later than two (2) full business days prior to the funding agency deadline.

Per OVPR, if the proposal is not submitted by the 5-day deadline, consequences may include: (a) return to the PI, (b) submission with minimal or no OVPR review, (c) withholding from submission if the proposal does not conform to sponsor guidelines and regulations and/or GWU policy, (d) post-submission scrutiny which may result in withdrawal from competition by GWU, (e) if awarded, a delayed start date because of additional time needed to review terms and conditions.

- **Internal documents for all proposals**

  The following internal documents are required as Supporting Document Attachments in Cayuse.

  1. Conflict of Interest and Financial Disclosures Form (please note, updated version available)
  2. Budget in Excel
  3. Budget Justification
  4. Copy of Solicitation/RFA/PA
  5. If applicable: Multi-School Routing Form(s), Sub-recipient Commitment form(s) with supporting documentation, Cost Share Form, Sponsor documents/communications.

  For proposals that are not submitted via grants.gov, please be sure to also include in Cayuse a PDF of sponsor package, including Scope of Work or narrative and any other documentation required by the sponsor.
Exceptions (Waivers and Fast Track)

Under rare circumstances, PIs may request submission of proposals outside of the 5-day window. This scenario, for instance, is more likely to occur under the circumstance of “award-proposal combinations” than on federal grant applications with well-established rolling deadlines. Referred to as a “waiver”, the PI must request and receive approval in writing via email from the Department Chair, the Associate Dean of Research, and the Associate Vice President of Research before the 5-day window. Permission for late routing will be considered but may not be approved; approval is contingent upon a variety of factors and should be considered by PIs as a high-risk request. If approved, late proposals may also receive a limited review, which could negatively affect proposal compliance and, in turn, result in rejection by the sponsor. When rapid-response opportunities arise, it is very important to communicate promptly with the Associate Dean of Research.

The SPH Office of Research Excellence has established a Fast Track routing process for opportunities that arise from “late breaking” requests for proposals, which often, but not exclusively, occur in the context of IDIQs, LTAs, international sponsors, and funding for emergent public health crisis. This process is intended to streamline and supplement departmental administrative resources, reduce institutional review time, and assure responsiveness to the sponsor’s requests (which are often unique or complex). A Fast Track request alerts departmental administrators and the Office of Research Excellence that a proposal may require special attention to meet the sponsor deadlines and other requirements. The Fast Track process can be used only for opportunities (prime or sub-award/contract) that have urgent deadlines. Currently, we define urgent as having a submission deadline of < 10 business days from the time of announcement or request from the sponsor. Fast Track cannot be used for standing or otherwise advance notice deadlines.

• Required forms and templates
OVPR makes available and requires a variety of required forms for proposal submission. The SPH provides investigators numerous templates and resources through the Research Resources Portal including proposal checklists, form templates, and facilities and resources sections, among other grant writing resources.

• Cost share
The SPH adheres to OVPR’s requirement that all cost sharing approvals on extramural grant applications must be obtained in writing from the PI’s Chair and Associate Dean of Research as well as OVPR. It is expected that these approvals are obtained as early in the development of a proposal as possible; estimated cost share commitments are acceptable and may pertain to costs such as salary, rent, IDC, and fringe benefit rates. Upon making these requests, it is important for the PI to indicate whether the cost share is mandatory or voluntary. See additional OVPR guidance or University guidance.

• Negotiating indirect costs with sponsors
There are situations where a sponsor does not accept GW’s federally negotiated IDC rates. In this case, when a sponsor does not have a published policy on what they allow to be charged as indirect costs, then the negotiation of the IDC is handled through OVPR by individuals who are authorized to negotiate on behalf of GW. To begin this process, the PI must submit a request to waive the IDC to the SPH Associate Dean of Research as far in advance of the deadline as possible. If approved at the level of the SPH, the request must subsequently be approved by the Associate Vice President of Research, then officially negotiated. It is important to underscore that every effort should be made to achieve budgeting goals without voluntarily foregoing university IDC.

• Signatures
Original signatures on required internal and external forms are preferred whenever possible. However, time stamps, e-signatures, or email can substitute for an original signatures. Signatures must be obtained prior to routing the proposal to OVPR. It is important to underscore that PIs, Department Chairs, or other faculty or staff employees of GW are not authorized to and should never sign a sponsored program proposal, contract or grant on behalf of the University—only OVPR designees have this legal authority. GW provides additional guidance on Officials Authorized to Negotiate or Officials Authorized to Commit the University at http://research.gwu.edu/institutional-information-sponsored-projects-proposals

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• **Routing proposals**

All SPH proposals are submitted through the Cayuse electronic routing process in accordance with OVPR requirements. **Cayuse 424** is a web-based application used to create, review, approve, and submit grant proposals. Cayuse currently supports 95% of all federal agency proposals and merges with electronic systems such as, AFSOR, AHRQ, CDC, CDMRP, DARPA, HRSA, NIH, NSF, DOE, DOD, DOS, USAID, and USDA. Instructions are available on how to use **Cayuse** at GW. When all application documents are uploaded into Cayuse, the PI initiates the electronic routing process in Cayuse. OVPR will contact the PI for final approval prior to the official submission to Grants.gov. In certain circumstances, the PI may delegate the final review task to a colleague; however, the ultimate responsibility for the content of the proposal cannot be delegated. It is the responsibility of the PI to approve all final documents for submission. Please note that any last minute changes to the internal or sponsor’s budget causes the proposal to be re-routed with documentation that the PI has approved the changes. Once approved by the PI, electronic proposals are approved officially by OVPR; paper proposals or other means of electronic submission (e.g., RWJF or NSF Fastlane) to sponsors are emailed by the PI or mailed by the designated department administrator on behalf of the PI.

• **Award-proposal combination**

In the absence of an official RFA/PA, the PI must provide the SPH and OVPR with timely written documentation (email, letter, or memo) addressed to the PI (or designee) from the sponsor explaining (a) parameters of the request, (b) deadline, (c) funding amount, and (d) any other specific requests. This document will serve as a proxy for the RFA/PA. Investigators are cautioned against working ahead of the contract or proposal award. However, if circumstances necessitate advanced work, the steps for **Administrative Establishments** from OVPR should be followed in coordination with your departmental administrator and designated OVPR sponsored projects administrator (SPA).

• **Sub-awards**

The SPH frequently generates proposals involving collaborations with sub-recipients. Establishing these agreements can be complicated and time consuming and are a common reason that proposal routing is delayed if not initiated in a timely manner. **Provide your departmental administrators with information about sub-awardees as far in advance as possible of the proposal deadline**. OVPR provides a **checklist** for sub-awardee processing. Sub-awardees must adhere to GW’s **Subrecipient Compliance Policy**.

Also note that if the prime award represents PHS funding, the sub-recipient will be required to certify that its institution has a policy compliant with the current PHS regulations related to Conflicts of Interest, **42 CFR Part 50 Subpart F**. If sub-recipient does not have a PHS-compliant policy, the sub-recipient investigators will be subject to the **GWU Conflicts of Interest Policy** and required to provide disclosure forms and certifications.

The following documents are required of each subrecipient (collaborating institution):

- Letter of intent
- Sub-awardee specific scope of work
- Budget
- Budget justification
- GW Subrecipient Commitment Form
- If applicable, federally negotiated institutional rate agreement
- Other documents as required by the sponsor

**Note:** When setting the receipt deadline for these documents from the sub-awardee, allow enough time to incorporate the documents into the GW routing package.

• **Grants versus gifts**

GW defines a Sponsored Project as specific research, training, service, or similar activity for which funding is provided by an external sponsor under an agreement with the University. Both grants and gifts can be
considered a sponsored research project. Importantly, status as a gift does not preclude routing through the SPH and OVPR. Click here for additional guidance on grants vs. gifts.

- **Inter-departmental/SPH collaborations, IDC, and other issues**
  Whether or not a sponsored project is determined to be On- or Off-campus is based on where the majority of the SPH effort (not dollars), inclusive of all personnel but excluding sub-recipients and independent contractors, is performed. This also includes Cost Sharing.

When a proposal involves investigators or personnel from multiple units or departments, we use the IDC from the department constituting the majority of work being performed. For example, if SPH (using a 26% off-campus IDC rate) proposes a project with SMHS (using a 58.5% IDC rate) and the majority of the work will be done at an off-campus SPH site, then the 26% rate would be applied to the overall project. Preponderance of work is based on location of the percentage of effort for the proposed personnel. The amount of IDC distributed to the respective Schools or units follows the dollars associated with the percentage of effort for the personnel listed in the budget. Upon award, OVPR will setup cost allocations for various schools and departments in order to allocate IDC accordingly. IDC allocations differ per award and are based upon personnel, time and effort, and location of work performed.

**Note:** If your project involves **international research or international collaborators**, please contact the SPH Office of Research Excellence as soon as possible.

- **Competitions with limited proposal submissions**
  Per OVPR requirements, when funding agencies or sponsors limit the number of grant applications that the institution may submit, interested investigators should notify the SPH Associate Dean of Research and send an email to ask_OVPR@gwu.edu immediately. OVPR will initiate an internal competition to determine the proposal(s) that will be permitted to move forward to ensure that GW sends only the allowable number of proposals. **Participating in an internal competition is required in order for GW OVPR to move your application forward; work closely with the Associate Dean of Research on these submissions.**

- **Administrative establishments**
  When a sponsor has confirmed/guaranteed in writing that funding will be granted but the contract negotiation process and agreement require additional time, the PI may ask the Department Chair to request the project’s Project/Task/Award (PTA) account be established in advance of the formal award notification. In the event that the award is never received, the financial culpability falls to the Department. This process requires that the PI submit an email to the SPH OVPR representative with concurrence from the Department Chair (or ADR if the PI is the Chair) requesting an administrative establishment and including the following information:
  - Project PI
  - Project Title
  - Project Sponsor
  - Project Start and End Date (Documentation of confirmed dates from sponsor)
  - The period of time for which the Administrative Establishment is requested
  - Project Number (if award is a continuation of an existing project)
  - Statement that – “If for any reason, the contract is not executed as anticipated the Department will assume responsibility for all costs incurred during the administrative establishment time period.”

OVPR will review the request and recommends its approval by forwarding it to the Associate Dean of Research for approval. Following Dean’s approval, your designated SPA forwards the approved request to central office at osr@gwu.edu with a copy to the designated OVPR Negotiator.

**E. Determining Conflicts of Interest**
The complex relationships among universities, government, and industry require attention to standards of procedure and conduct in research. The Faculty Code states that faculty and staff “acting on behalf of the university should strive to maintain the highest level of ethics in all of their actions on behalf of the university, and must comply with university policies as well as external laws and regulations. Furthermore, “conflicts of
Interest may occur when there is a divergence between a faculty member’s private interests and professional service to the University.” Under the University’s “One-day-a-week” rule, a full-time faculty member (except for research and medical faculty) may spend the equivalent of up to one day a week on outside consulting and other professional activities, as long as it does not interfere with University obligations.

Conflict of interest in research involves circumstances under which a researcher has any significant financial interest that may compromise, or have the appearance of compromising, professional judgment in the design, conduct, or reporting of research. This could include personal compensation from industry, equity interest or a management role in a company, or royalties generated from intellectual property rights from any source. You may view GW’s current policy here. Refer to the SPH website for specific SPH COI/FCOI guidance for our faculty.

Effective August 24, 2012 the federal government issued a significant change in the procedure for disclosing conflicts of interest to comply with new federal regulation regarding public health service funding. To comply with this regulation, GW provides required training offered through CITI. In summary, these policy changes require that institutions adhere to the following:

- Must disclose all financial interests related to university duties (teaching, research, practice, etc.)
- Must have a procedure to determine if interests are related to an investigator’s research
- Reduction in what constitutes financial conflict of interest (from $10,000/year to $5,000/year)
- Must disclose income from private non-profits
- Must disclose reimbursed/sponsored travel except travel sponsored by universities, government agencies, or academic medical centers
- Mandatory training on financial conflict of interest
- Institutions must make fiscal conflict of interest information public
- Institutions must monitor compliance with management plans
- Prescriptive action for non-compliance
- Institutions must report financial conflicts of interest to PHS

Per federal policy, as of August 24, 2012, investigators submitting a proposal (for a grant or contract) under the PHS umbrella must file the supplemental form. The OVPR website provides information on forms along with other general information about the federal SDFs and disclosure requirements. Upon completion of the form, investigators must email the form to OVPR at rescomp@gwu.edu. No grant or contract under the PHS umbrella can be submitted without these forms on file in OVPR. Moreover, no PHS award can be set up without these forms in place at GW, even if the application was submitted prior to August 24, 2012. Forms also need to be submitted upon renewal of existing PHS awards funded prior to August 24, 2012. Investigators are not required to email nor should they be asked by others to email or copy these forms to any other individuals.

III. Post-award Management

PIs have primary responsibility for the conduct of the of the program in accordance with regulations relevant to sponsor requirements and the policies of GW regardless of whether they have been delegated to project, department and/or school staff.

There are several post-award procedures that warrant PI communication with Department Administrators, SPH Associate Dean of Research, and/or OVPR. These include:

- Change in effort among key personnel;
- Change of Project Director or PI;
- Equipment transfers or changes in facilities;
- Grant and contract transfers;
- Monitoring project expenses;
- Requesting that invoices be generated;
- Requesting no-cost extensions;
- Carry forward requests;
- Certifying time and effort;
• Providing progress reports and deliverables;
• Requesting project close out.

It is suggested that, upon funding, investigators request a Kick-off Meeting with their department administrator and the designated OVPR post-award sponsored research administrator (SPA) plus any other key stakeholders to confirm project goals and the timeline for implementation. This may be especially important for projects that have tight turnaround for project deliverables, new employment hires, new lab or supply purchases, equipment purchases, and service agreements.

PIs are responsible for timely monitoring of effort and financial activity for each award. Account monitoring is essential to ensure all charges posted to project award accounts are accurate, allowable and correctly identified. To assist PIs with monitoring financial activity on their sponsored project awards, PI Dashboard is available as an online analytics tool. PI Dashboard provides PIs with the ability to quickly gain the insight necessary for making data driven, informed decisions about their sponsored projects. Benefits of PI Dashboard include (1) a real-time overview of their grant funds (e.g., budgeted items, expenditures versus budget visuals, spending commitments); (2) a drill down to detail by expenditure type; (3) alerts for award end dates, new awards, funding changes, and over budget; and (4) a monthly run rate and award labor effort.

A. Initiating Sub-awards
To initiate the sub-award process, the designated departmental administration staff must work with the PI to assemble materials such as the sub-awardee’s statement of work (SOW), detailed budget, budget justification, PI identification, Sub-recipient Commitment Form and organizational contact information. This sub-award documentation must be submitted to OVPR. Should it be necessary to change any portion of a sub-award, the PI in conjunction with designated departmental administration staff, should contact OVPR to amend the sub-award. Common reasons for amending a sub-award include providing additional funding or extending the period of performance. Changes such as scope of work modifications, reassignment of sub-award recipient's PI or transfers of the sub-award from one recipient to another, may require the prior approval of the prime sponsor.

• Financial monitoring of sub-awards
In accordance with the sub-award, invoices should be provided on a regular basis. The PI, in conjunction with designated departmental administration staff, should review the invoices to ensure the payment is consistent with the effort performed and the award budget. The PI should provide approval prior to payment of the sub-award invoices.

• Monitoring
All PIs are encouraged to engage in sub-award monitoring including the following:
• Determine if sub-award recipient's progress is commensurate with the costs claimed ( invoiced);
• Determine if the costs claimed ( invoiced) are within the amount of the sub-award;
• Determine that the invoice dates are within the sub-award period of performance;
• Determine if the invoices contain any unallowable costs;
• If there are cost share commitments, determine that the sub-award recipient fulfilled its commitments.

Additional guidance may be found in GW’s subaward monitoring procedures. The PI Dashboard is another useful resource for monitoring sub-award expenditures and encumbrances.

B. Recruiting and Hiring Research Staff
Once funded, PIs often have the responsibility of hiring project staff. As a first step, all PIs should become familiar with GW's online Supervisors Guide. The Supervisors Guide is an open document, continually changing, so refer to it with each new hire. In addition, the SPH has a Human Resource Office with staff dedicated to research hires. The PI's department must initiate recruitment by completing the Recruitment Action Request Form (RAR). In addition to the RAR, the following should also be included in the recruitment
package:

- Proposed job description;
- Memorandum detailing what has changed within the department and the business need for the new position and duties (how it affects or compares to other department positions, functions, etc.);
- Current organizational chart and proposed organizational chart (applies when reclassifying a vacant position, reclassifying a current employee, introducing a brand new position into the department, and proposing a reorganization of a department);
- Resignation letter from the incumbent, if applicable.

The processes for recruitment of research staff, including postdoctoral fellows, is the same as for non-research staff with the only exception being that budgetary approval will come from an OVPR sponsored research administrator (SPA). If the position is being funded by multiple funding sources (i.e., the position is being funded by departmental funds and grant funds), the position will have to obtain OVPR approval in addition to approval from the department’s Financial Director. If there are any concerns with the identified funding source, the assigned OVPR administrator/Financial Director will reconcile directly with the department, prior to releasing to the Human Resources Client Partner for final review. Once all approvals have been obtained, the SPH Human Resources Office will initiate action and submit to the University Recruitment Office for review and posting. Once the position has been posted, the SPH Human Resources Office will provide the departmental initiator with the qualified resumes. The hiring agent or PI may review all resumes or allow the Human Resources Office to pre-screen the potential candidate.

It is very important to work closely with Human Resources Office throughout the recruitment and hiring process. The following additional guidance for the SPH may be useful:

- There is no administrative difference in the hiring process when hiring PT vs. FT employees;
- All PT and FT Research titled and funded positions are Exempt and a grade 0 (e.g., Research Asst., Research Admin, Research Scientist etc.);
- University titled positions funded by research are graded and can be exempt or non-exempt (e.g., Administrative Assistant, Communication Assistant)—SPH Human Resources Office will review all requests and make the final decisions on titles and classifications based on the description provided by the Hiring Manager/PI.

The Graduate Research Assistant appointment process is administered by the SPH Office of Student Financial Services.

D. Procurement
It is essential for PIs to work closely with their departmental administrators and designated OVPR SPA to acquire goods and services to carry out activities associated with their sponsored project. Competitive solicitation is required before a contractor can be selected for the majority of purchases over $3,000. Solicitations may be in the forms of a quote (formal or informal), bid, or request for proposal. If the purchase is from a federal contract and over $3,000, Procurement must handle the solicitation. If over $150,000 using university funds, federal grants, or non-federal sponsored projects. Procurement must be notified and involved at the outset. If a good or service is on the Competitive Exemption List (and is not federally funded), a responsible university office may select a contractor with no competition, and the purchase may be paid by P-Card or via Payment Request form. Sole source selection is also used in rare situations when restriction of competition can be justified successfully.

E. Post-Award Communications
As a SPH investigator, your research and other professional activities can help advance the public’s understanding of public health issues. The SPH Office of Communications will assist in promoting award announcements and subsequent research findings. Such media coverage establishes certain investigators as the go-to expert on a public health topic, heightens the visibility of the School, and promotes public knowledge.
Investigators should contact the SPH Office of Communications once a study, report or commentary is completed and weeks prior to it being made public. Once a study has been published online or released to the public, it is more difficult to interest media in a story because they consider it “old news.” Also, investigators should keep in mind that it can take time to produce an accurate and compelling press release—one that you have the time to review. The Office of Communications will also draft studies and reports in the SPH Faculty/Staff newsletter or a Content Alert Bulletin for various stakeholders or policy makers. Investigators should inform the Office of Communications if presenting a talk at a scientific conference or special meeting—such presentations may merit a news release or some other promotional activity. The Dean’s Office encourages investigators to contact the SPH Office of Communications when a reporter calls or requests information from an investigator. They will assist in setting up the interview and conducting necessary follow-up with a reporter or news outlet.

IV. Human Subjects Research and the Institutional Review Board

If you are planning to conduct research involving human subjects you must obtain Institutional Review Board (IRB) review and approval before collecting or analyzing any data. Visit the Office of Human Research website to learn about the IRB process and requirements for submitting your protocol for review and approval. Click on Forms to view:

- Decision charts to determine which type of review is appropriate for your study.
- Consent from guidance documents (under Full Review and Expedited Review)
- IRB submission forms appropriate for each type of review
- HIPAA forms

The IRB is composed of more than 40 members representing University faculty, staff, students, Medical Faculty Associate (MFA) and George Washington University Hospital employees and the local community. The IRB is comprised of two independent review committees and a third, executive committee, comprised of chairs and vice-chairs of the other two panels. Each committee meets monthly to review human subjects research and related issues. Please note that GWU is now utilizing Western IRB (WIRB) to review all sponsored clinical trials research. Contact the Office of Human Research (OHR) at 2100 Pennsylvania Ave. NW, Suite 300-A, Washington, DC 20037, or email at ohrirb@gwumc.edu, or 202-994-2715.

Student Research and Human Subjects—The SPH has specific guidance on whether or not IRB review is necessary before conducting a given activity. This guidance details the distinctions between research and non-research activities. It is important to err on the side of caution and consult with the SPH Student IRB Liaison at SPHStudentIRB@gwu.edu and/or the GW Office of Human Research at ohrirb@gwumc.edu if there is any doubt that an activity requires approval. Click here to view the Milken Institute SPH Student Research and Human Subjects Determination and the Milken Institute SPH Student Human Subjects Research Determination Form.

CITI Training (Human Subjects)—The Collaborative Institutional Training Initiative (CITI) is a subscription service providing research ethics education to all members of the research community. All Principal Investigators and members of the research team are required to have completed CITI training prior to requesting IRB review of a research proposal and prior to conducting any research involving human subjects. This training requirement also applies to student researchers and their faculty advisors. It is also important to maintain current CITI training until your study is closed through the GW Office of Human Research.

HIPAA Training—GW Milken Institute School of Public Health in partnership with the GW Office of Compliance and Privacy and the Office of the Senior Vice President provides HIPAA (Health Insurance Portability and Accountability Act) training to all SPH faculty, staff, and student wage employees who conduct research with protected health information (PHI) connected to covered entities through the CITI training portal. If your research uses protected health information (PHI) data generated from or connected with a covered entity, you must complete the HIPAA training annually. PIs are responsible for assurance that all key personnel and project staff who interact with the PHI data also complete the training. Click here for additional guidance.
RESOURCES

- GW Sponsored Projects Handbook
- GW Faculty Guide
- SPH ORE Staff