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Budgeting for an Icahn School of Medicine (ISMMS) Faculty Member with a Veterans Affairs (VA) Medical Center Appointment

The purpose of this memo is to clarify the information required on the budget of a sponsored project application for a Mount Sinai faculty member who has an appointment at a Veterans Affairs (VA) Medical Center.

I. Appointment Types

For information regarding VA appointments, please contact the VA administration. For the purposes of sponsored project budgeting, please note the following appointment types:

A. Joint ISMMS and VA Appointment

The faculty member:

- has a faculty appointment at ISMMS.
- receives dual compensation from both ISMMS and VA (i.e., two paychecks).
- signs a Memorandum of Understanding (MOU) countersigned each year by ISMMS and VA. Click here for Mount Sinai's policy on joint appointments.
- works at ISMMS, the VA or both campuses.

B. Paid 100% by VA

The faculty member:

- has a faculty appointment at ISMMS.
- receives compensation from the VA (i.e., one paycheck).
- typically works at the VA but may also work at the ISMMS campus.

C. Paid 100% by ISMMS

The faculty member:

- has a faculty appointment at ISMMS.
- receives compensation from ISMMS (i.e., one paycheck) .
- does not receive compensation from the VA.

II. Budgeting for Faculty Member according to Appointment Type

While based upon NIH policies for joint VA-Academic appointments, Mount Sinai employs the same general principles regardless of funding agency type.

A. Joint ISMMS and VA Appointments

1. NIH Policy

In accordance with NIH policy (see policy links in "resources" section), when faculty with joint VA appointments are included as personnel on NIH applications, they are required to disclose the nature and extent of their joint appointment.

2. Percentage of Effort and Base Salary

As per the instructions in section G.300.A of the <u>SF 424 Application Guide</u>, "Individuals with joint university and V.A. appointments may request the university's share of their salary in proportion to the effort devoted to the research project." List the percentage of the appointment that is to be devoted on the project. Include the ISMMS base salary.

For those cases in which, additionally, a portion of the VA appointment will also be devoted to the project, complete the type of appointment and the percent of VA effort on a separate line. Do not include any salary compensation for the portion of the VA appointment that will be devoted to the project.

3. Documenting VA Effort Commitments

Please note that effort expended on a VA appointment on a sponsored project routed through ISMMS must be approved by the VA and disclosed to the funding agency. Any such effort does not fulfill any mandatory cost share requirement even with funding agency approval, unless approved by Congress. Any effort should be referred to as effort expensed on a VA appointment and must never be referred to as a "cost share." It is not acceptable to cost share with other federal funds unless specifically authorized. Upload VA approval in the "Internal Documents" tab of InfoEd.

4. Budget Justification

Disclose the ISMMS/VA appointment and include the type of eighths appointment (e.g., 3/8th appt; 5/8ths appt) in the budget justification. Provide information regarding the portion of time committed from ISMMS appointment.

Example:

Dr. Smith has a joint ISMMS – VA appointment. He has a half-time faculty appointment at ISMMS and a $5/8^{th}$ appointment at the VA. Below is suggested budget justification language.

Dr. Smith, Co-Investigator, 1.2 CM

Dr. Smith has a joint ISMMS – VA appointment. Dr. Smith will devote 1.2 CM of his time committed from his ISMMS appointment. This is the equivalent of a .6 CM full time appointment.

5. Facilities and Administrative (F&A) Costs

Use the appropriate federal on-campus or off-campus (i.e., VA) F&A rate depending on where the work is conducted. A complete listing of ISMMS's F&A rates is published in GCO's <u>Administrative Information Sheet</u>.

Effective October 15, 2021 for competitive federal grant applications, if work is conducted both on campus and off campus, choose the rate where the project is primarily conducted. Grants awarded prior to October 15, 2021 that are conducted both on campus and off campus use a split indirect cost rate model. These grants continue to use a split rate model until the end of the competitive segment.

Effective October 15, 2021 for federal contracts (i.e., not a grant), begin employing this new method in the next funding increment whether or not the next increment is competitive. Finance will start charging at the single rate beginning January 1, 2022. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.

B. Paid 100% by VA

1. Percentage of Effort

List the percentage of the VA appointment that is to be devoted on the project. Do not include any salary compensation information.

2. Documenting VA Effort Commitments

Obtain approval from the appropriate VA administrative officer confirming that VA funds will cover the cost of the faculty member's effort and upload the document in the "Internal Documents" tab of InfoEd.

Any effort should be referred to as effort expensed on a VA appointment and must never be referred to as a "cost share." It is not acceptable to cost share with other federal funds unless specifically authorized.

Sample VA administration approval: I approve Dr. Smith working 5% effort on Dr. White's NIH study entitled "Multigenerational Effects of Undernutrition."

3. Facilities and Administrative (F&A) Costs

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4. Budget Justification

Disclose the ISMMS/VA appointment in the budget justification. Clearly indicate that all effort is being committed through the VA appointment.

Example:

Dr. Hart, .6 CM, %, Co-Investigator

Dr. Hart has appointments at ISMMS and the James J Peters VA Medical Center. He receives compensation solely through the James J Peters VA Medical Center and his effort is committed through his VA time.

C. Paid 100% by ISMMS

Please be reminded to use the appropriate federal on-campus or off-campus (i.e., VA) F&A rate depending on where the work is conducted. A complete listing of ISMMS's F&A rates is published in GCO's <u>Administrative Information Sheet</u>.

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III. Resources

GCO

- Oversight of VA Memorandum of Understanding (MOU)
- Budgeting: Updated DHHS Rate Agreement and Federal Sponsored Projects Conducted On and Off Campus

Sponsored Projects Accounting (SPA)

Joint Appointments - Memorandum of Understanding

National Institutes of Health

- <u>SF 424 (R&R) Application Guide for NIH and Other PHS Agencies</u> > G.300 A. Senior/Key Person > Special Instructions: Joint University and Department of Veterans Affairs (V.A.) Appointments
- NIH Grants Policy Statement > 17.3 VA-University Affiliations