

## **General GCO**

### **What is the GCO?**

The **Grants and Contracts Office (GCO)** of Mount Sinai School of Medicine is the centralized administrative office that oversees the Sponsored Programs application process and provides research support to faculty.

GCO documents policy, informs faculty about sponsorship, policy changes, and funding opportunities, and generally assists faculty in all aspects of the pre-award process. The GCO also collects data regarding faculty research performance and reports to senior management regarding institutional performance.

(Reference: The Grants and Contracts Manual, which can be found [here](#).)

### **I am submitting my first grant application. What should I do first?**

Investigators are advised to contact their Departmental Administrators for advice regarding grant submission and InfoEd use.

It is advisable to be prepared with specific information upon contacting the Department Administrator or the GCO. Please provide the GCO and your departmental administrator with the details of this grant:

- Funding Agency Name
- Funding Opportunity Number (if applicable)
- Deadline
- Proposed Project Period
- Proposed Direct Costs per year
- Will there be subcontracts?
- Will it be a [Multi-PI](#) proposal?
- Will animal/human subjects be involved?

### **Who do I contact to get registered for the NIH eRA Commons?**

NIH eRA user accounts are registered by the Grants Coordinator. Please email the [Grants Coordinator assigned to your department](#). Include the following information: First and Last Name, Email Address, and your role:

- Principal Investigator (PI)
- Postdoctoral Associate (POSTDOC)
- Assistant (ASST).

More information can be found here: [http://era.nih.gov/files/eRA\\_Commons\\_Roles.pdf](http://era.nih.gov/files/eRA_Commons_Roles.pdf).

### **I did not receive an email from [Grants.gov](#) notifying me that the grant has been submitted. Is this a problem?**

Investigators do not receive receipt emails directly from Grants.gov. Only [NIH eRA Commons](#) emails go to both the PI and the Institutional Official.

For NIH grants, Principal Investigators are reminded to log into the NIH eRA Commons and review the proposal in its final form for any transmission errors. (For further information please see: [http://grants.nih.gov/grants/ElectronicReceipt/submit\\_app.htm](http://grants.nih.gov/grants/ElectronicReceipt/submit_app.htm).)

### **I am planning to apply for a grant that is offered by a foreign country and I would like to know if I have to apply through your office. This grant covers my salary and is paid directly to personal account.**

There may be institutional reporting, commitment and/or endorsement requirements. Investigators are advised to contact the GCO for an accurate determination of processing.

### **I am submitting a no-cost extension. Do I need to provide a justification to the GCO even if the sponsor does not require it?**

Yes. A simple progress report including a justification for the no-cost extension is required by the GCO, regardless of whether or not this is the first request. Approval for the first no-cost extension on NIH grants is covered under expanded authorities. "[Expanded authorities](#)" means that the NIH has delegated certain activities, in this case the determination of need, from its own staff to the institutional business office. It does not mean it is no longer required.

### **Is it possible to have a no-cost extension for an MSSM (internally-funded) project?**

Since funds are not tracked along with internally funded projects, there is no option for a "no-cost extension." In order to continue an already approved MSSM project, the only option is: a non-competing continuation.

### **I am completing Other Support for an NIH grant. Do I include the grant for which the Other Support is being requested?**

According to the [PHS 398 Guidelines](#):

Information on active and pending Other Support is required for Senior/key Personnel, excluding consultants. For individuals with no active or pending support, indicate "None." **Neither the application under consideration nor the current PHS award for this project should be listed as Other Support.** Do not include Other Support for individuals listed as "Other Significant Contributors" unless their involvement has changed so that they now meet the definition of "Senior/key Personnel."

### **Personnel:**

#### **Is it acceptable for a grant to identify faculty as "non-key"?**

Chairpersons are responsible for reviewing and approving the activities of all faculty members in their respective departments. Since routing to the Chairpersons is directed by the persons named in the key personnel section, faculty should always be listed as key personnel.

#### **Is it permissible for adjunct faculty to submit grants via MSSM?**

Adjunct is the Basic Science equivalent of voluntary. They don't receive salaries at MSSM so they can never charge salaries on grants, but they can submit through MSSM. Certain funding mechanisms that primarily support salary reimbursement such as K awards would not be appropriate applications for adjunct or voluntary faculty.

#### **Are consultants Key Personnel or Other Significant Contributors?**

Consultants can be identified as Other Significant Contributors regardless of pay. It is advisable that consultants be identified as Other Significant Contributors (paid or unpaid). This will ensure that their biosketches will be included in the proposal. Ultimately, it is the PI's decision as to which role the consultant falls under: [Key](#), [Other Significant Contributor](#) or Non-Key. Note: IRS regulations do not allow the payment of consulting fees to MSSM employees also receiving salaries.

#### **What is the procedure for a PI who switches departments? Do we need to notify GCO & the Sponsor?**

Yes, a formal notification should be sent to the GCO including concurrence from the previous and current departments. No communication should be sent to the sponsor. The GCO will evaluate and determine what internal and/or external steps are warranted.

#### **The PI is devoting effort on a budget but is not requesting salary compensation, is this acceptable?**

Please see our [Cost-Sharing Policy](#).

### **Final Reports:**

#### **Are the InfoEd eForms required for Final Reports?**

The InfoEd Final Report template does not include an eForm Component.

#### **What is the procedure for Final Reports for NIH grants?**

- The PI uploads the final scientific progress report to the [NIH eRA Commons](#). No Institutional sign-off is required.
- GCO certifies the final invention report after consultation with [Office of Technology and Business Development](#).
- Finance uploads the final financial status report.
- The PI submits a Final Report to the GCO via InfoEd. The InfoEd record should include the Final Report which is already or will be uploaded to the NIH eRA Commons.

### **Subcontract Questions:**

**I will be applying for an NIH grant, which will include several subcontracts.**

#### **Are there any special items that are needed, or any areas we should pay special attention to?**

- Foreign subs are limited to 8.0% Facilities and Administrative costs.
- If this is a [multi-PI](#) proposal – each PI must have an [NIH eRA Commons](#) username.
- Every institution is required by the NIH to have a DUNS number per the notice [NOT-OD-11-004](#). Non-compliance will result in rejection by Grants.gov.
- Per the [SF424 guidelines](#), there are several items which must be addressed:
  - Research & Related Other Project Information: Item 6 a-b. This includes an optional explanation for "Foreign Justification."
  - PHS 398 Research Plan Component: Item 13: Consortium/Contractual Arrangements
  - R&R Budget and Budget Justification for the subaward.

**According to the NIH Notice: [NOT-OD-11-004](#), active registration on the CCR database is required for all applicant and grantee organizations. Do our consortium/contractual sites also need to register with CCR?**

Yes. CCR registration is required for all consortium/contractual sites (domestic and international). However, for pre-award review, the DUNS number is the highest concern as the application cannot be submitted without it.

The CCR registration has no bearing on application submission. This must be completed prior to the time of award, but not prior to the time of application.

**For Progress Reports with subcontracts, are Letters of Intent to Enter into a Consortium required?**

Yes. All subcontractors are required to provide a Letter of Intent to Enter into a Consortium on an annual basis.

**For Progress Reports, where MSSM is the sub, are Letters of Intent to Enter into a Consortium required?**

Yes. MSSM provides Letters of Intent, even if not requested by the Prime, on an annual basis.

**Letter of Intent to Enter into a Consortium: who provides this?**

The PI should provide a completed [MSSM Consortium form](#). The GCO will sign, upon approval. The PI is responsible for submitting this to the prime institution.

**I have a grant on which there is a subcontract. The subcontract will be transferring from the originally awarded sub institution to a new sub institution. What do I do?**

The PI must inform Finance as soon as possible to allow Finance to amend the existing sub-award.

The PI must submit standard required GCO pre-award subcontract documentation to the GCO Specialist. (sub-PI biosketch, budget + budget justification, resources page [of new institution], checklist, letter of intent to Enter into a Consortium). Include a brief memo regarding the move and confirming that Finance has been notified.

**Proposals with Animal Subjects:**

**What is required of an investigator at the time of application when animal/human subjects are involved?**

Complete applications include compliance applications (PPHS or IACUC) unless the funding agency has a two-step review process that allows a Just-In-Time (JIT) review by the MSSM compliance committees (such as the [NIH JIT Procedures](#).) (taken from : The Grants and Contracts Manual, which can be found [here](#).)

**eGCO:**

**When creating an InfoEd record, I'm not able to enter the GCO number of the project.**

**What can I do? Will the office know that this is a continuation even if they don't see the number?**

Investigators are advised, but not required, to identify the GCO number in a memo. This memo should be attached to Internal Documents, and titled: "Memo to GCO."

Once the proposal is routed to the GCO Coordinator, the "Proposal Number" will be changed to the correct GCO number.