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GCO Procedure for Oversight of VA MOUs

These procedures supplement the <u>Financial Memorandum No. 175, "Memorandum of Understanding – Joint Appointments</u>", and are established to provide central oversight and tracking of Memorandum of Understanding (MOU) for Icahn School of Medicine at Mount Sinai (ISMMS) faculty with dual Veteran Administration (VA) appointments. These procedures will initially be implemented in calendar year 2021, and made effective in calendar year 2022.

For Federal sponsored projects, ISMMS faculty members with dual VA appointments must maintain a valid MOU identifying their relationship between both parties at least on an annual basis, or any time there is any significant change to the faculty member's distribution within that annual period. Please refer to NIH Grants Policy Statement Part II Subpart B Section 17.3 for further details.

ISMMS requires the Department Administrator to distribute MOUs to those faculty who have salary support from a federal grant and to retain the properly approved/signed MOU in departmental files. The Grants and Contracts Office (GCO) will maintain a central repository for MOUs in the grants tracking database, InfoEd, and will require each Department Administrator to provide to GCO a copy of the fully signed annual MOU.

Process:

In December, GCO office staff will send a reminder email about this procedure and request each department administrator provide a list of current faculty with dual VA appointments. GCO will maintain a central list of such faculty in internal shared drive, and create a Proposal Tracking (PT) record in InfoEd.

At the beginning of each calendar year, GCO office staff will send a request to each department administrator to provide copies of that year's annual MOU for all such faculty. MOUs will be due to the GCO office no later than March 31st of the calendar year.

Reminder notices will be sent monthly to Department Administrators and faculty through March 1. Delinquent notices will be sent to Department Administrators, Chairs and faculty for all outstanding MOUs starting April 1.

The GCO may not submit any Federal grant applications for those faculty with outstanding MOUs after the deadline. As a reminder, Joint ISMMS/VA appointments must be disclosed in the application budget justification, Biographical Sketch and Other Support documents. The GCO grants specialist shall verify the status of MOU compliance as part of grant application review.

GCO Staff Contacts for VA MOU Oversight:

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Related Policy and Guidance Information:

- Budgeting for an ISMMS Faculty Member with a VA Appointment
- Financial Memorandum 174, Time and Effort Reporting Policies and Procedures
- Financial Memorandum 185, Faculty Effort on Sponsored Projects

FINANCIAL MEMORANDUM Memorandum No. 175 ICAHN SCHOOL OF MEDICINE AT MOUNT SINAI Approved by SUBJECT: MEMORANDUM OF UNDERSTANDING – JOINT APPOINTMENTS S. HARVEY Page 1 of 2 Date Issued/Amended 05/02/2014 Replaces 04/19/2004

I. Purpose

The purpose of this memo is to set forth the guidelines for the Memorandum of Understanding when a faculty of Icahn School of Medicine at Mount Sinai has Joint Appointments with one of the Medical School's affiliates that also compensates the faculty, e.g., Bronx VA.

II. Statement of Policy & Procedure

Icahn School of Medicine at Mount Sinai requires that faculty who have Joint Appointments complete and sign the Memorandum of Understanding (MOU), annually, documenting the effort assigned to each activity (Clinical, Education/Supervision, Research, and Administration) at Icahn School of Medicine at Mount Sinai and the affiliate. (See Exhibit A.)

The Faculty allocates 100% of his/her time at <u>each</u> organization. The MOU's are signed/ approved by the appropriate officials at the affiliate, the Principal Investigator/ Faculty, and the MSSM Department Chair.

It is the Departments' responsibility to distribute MOU's to those faculty who have salary support from a federal grant and to retain the properly approved MOU in accordance with the statute of limitation audit requirements. Sponsored Projects Accounting will issue a reminder of this requirement to Department Administrators on a calendar year basis.

MEMORANDUM OF UNDERSTANDING

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| A 1 | |

| Subject: Joint Appointment, | Icahn School | l of Medicine at M | lt. Sinai | (ISMMS) | and James | J Peters | VA |
|-----------------------------|--------------|--------------------|-----------|---------|-----------|----------|----|
| Medical Center (JJPVAMC) |) | | | | | | |

The following schedule represents the distribution of total responsibilities for between the Icahn School of Medicine at Mt. Sinai and the James J Peters VA Medical Center (JJPVAMC).

A. ISMMS University Appointment

Title:

MSSM Life No.:

| % Distribution of Total |
|-------------------------|
| Responsibilities |
| 0% |
| 0% |
| 0% |
| 0% |
| 0% |
| |

B. JJPVAMC Appointment Title:

| Responsibilities | Hrs per Week | % Distribution of Total Responsibilities |
|-----------------------|--------------|---|
| Clinical | 0.00 | 0% |
| Education/Supervision | 0.00 | 0% |
| Research | 0.00 | 0% |
| Administration | 0.00 | 0% |
| Total | 0.00 | 0% |

This is to certify that ______, receives salary from both the ISMMS and the JJPVAMC, and that there is no dual compensation from these two sources for the same work, nor is there an actual or apparent conflict of interest regarding such work.

Mary Sano, PhD
Associate Chief of Staff for Research, JJPVAMC

[Name of Investigator, MD/PhD]
Investigator

Anthony Reino, MD [Name of Chair, MD/PhD]
Chief of Staff, JJPVAMC Dept of [Dept Name], ISMMS