



Policy 7.10

Policy of F&A Costs in Collaborative Research

Responsible Official: VP for Research Administration

Administering Division/Department: Sponsored Programs

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Last Revision: July 25, 2013

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Overview

The continuing and developing complexity of research has resulted in the growth of externally-sponsored multidisciplinary collaborative research projects. These collaborations cross the traditional school and division lines. These collaborative projects continue to be a very productive and necessary method for the faculty to accomplish their scientific aims and objectives, and it is important that we maintain the university's system for acknowledging and rewarding the schools and divisions for their faculty's efforts in these projects.

In response to this continuing need, and in an effort to acknowledge and encourage these collaborative projects, the university, in cooperation with the schools and divisions, recognizes that the financial contributions of the participants, based on the sponsored research project award, must also be documented and allocated.

The following policy is established to properly allocate the facilities and administrative cost revenues among the participants. The primary principles are:

- Proposals initiated by faculty will be identified at the time of submission as collaborative. This collaboration will be documented in the Emory Proposal Express (EPEX) record.
- The appropriate Facilities and Administrative rate will be determined at the time of proposal submission. When there is collaboration between the Yerkes National Research Primate Center and the Main Campus, the rate is determined by the preponderance of direct costs.
- The Administrative Home of the proposal and resultant award will be determined at the time of proposal submission based upon the Primary Academic Appointment of the Principal Investigator except as noted in 3 below.
- Facilities and administrative cost revenue will be shared among collaborators at the direct cost threshold of \$10,000 per year.

Applicability

This document applies to all faculty, staff and students at Emory University.

Policy Details

1. If a sponsored project involves more than one school/center or division, the EPEX proposal record will indicate that the project is collaborative and identify the partner(s) in the collaboration. A school/center or division is any unit that can submit a grant/contract on behalf of the university.
2. The appropriate Facilities and Administrative rate will be determined at the time of proposal submission. When there is collaboration between Yerkes and the Main Campus, the rate is determined by the preponderance of direct costs. If 50% or more of the direct costs take place at Yerkes, the entire proposal will be submitted using the Yerkes rate. In general, proposals will not be submitted with both the University and Yerkes rates, with the following exception. If the proposal is for a program with natural, distinct components (such as for an NIH P01, P50, or U19 proposal), an individual component may be submitted at differing rate. (For example, if the proposal is based in the School of Medicine, but an entire Core or Project resides at Yerkes, that Core or Project may be submitted using the Yerkes rate.)
3. The Administrative Home of the proposal and resultant award will be determined at the time of proposal submission based upon the Primary Academic Appointment of the Principal Investigator. Since the Yerkes National Research Primate Center does not grant any Academic Appointments, Yerkes will be the Administrative Home in the following circumstances:
 - a. for all Yerkes-based faculty, with the exception noted below. Yerkes-based faculty is defined as that faculty with primary workspace in Yerkes - controlled space.
 - i. Exception: if a Yerkes-based faculty submits a proposal where none of the work shall occur at Yerkes, then the Administrative Home of the proposal shall be with the department of that faculty member's Academic Appointment
 - b. for Yerkes-based projects. Yerkes-based projects are defined as those projects where the primary workspace (defined as a preponderance of direct cost expense) for the project is Yerkes. Consequently, some awards will be administered by Yerkes and have a Principal Investigator who is not considered a Yerkes-based faculty or who is not physically a resident at Yerkes.

- i. Exception: program project and center type grant (those with natural, distinct components such as NIH P01, P50, or U19 proposals) shall not be considered Yerkes-based projects under this policy unless they are submitted by Yerkes-based faculty as described above.

In order to allow appropriate tracking of effort and monitoring of faculty activities, it shall also be the case, that the department and school of the Primary Academic Appointment of the PI shall be added to the EPEX workflow via the Ad Hoc mechanism in cases where that department and school are not otherwise included in workflow due to the selection of a different Administrative Home for the PI and proposal. (For non-competing continuations with no budgetary or effort changes, this step may be omitted at the discretion of the submitting unit.)

The Chief Business Officers (CBO) and/or Dean of the unit or his/her designee, as appropriate, of the affected schools may also determine the Administrative Home based upon any other criteria upon which they mutually agree.

4. At award, the Office of Sponsored Programs (OSP) will be responsible for notifying the collaborating participants by e-mail of award information. Upon receipt of award information from OSP, the collaborating units will indicate their approval of the split by signing the Interunit Collaboration Agreement form. This form must be signed for each award, regardless of whether there has been a change in budget from the time of proposal submission.
5. This Policy shall be applied to all units within the University, as follows:
 - a. For collaborations involving less than \$10,000 of direct costs per year, the collaboration will be identified and recognized in both the EPEX/Compass record and through the inclusion of participating faculty on the NOA. However, there will be no financial ramifications of this collaboration.
 - b. For collaborations involving \$10,000 or more of direct costs per year, the collaborators will provide separate budgets to OSP. Separate Compass projects and associated Smart Keys will be established based upon the budgets provided.
 - c. It is understood that most faculty have research, teaching and clinical/service obligations. These faculty members may have space in two different Schools/Units. These obligations do not impact indirect cost split determinations. For example, indirect cost revenues are not split if a faculty member reviews data at his/her teaching location or he/she prepares a lesson plan at his/her research location.
6. The Award and Project set-up process described in 5 above will f

ollow the timetable outlined below:

- a. The collaborating units will have fifteen working days from the date of e-mail notification to determine the division of the direct costs between them. A Smart Key cannot be assigned or NOAs processed until this step has been completed.
 - b. If the collaborating units have not finalized the determination of the division of direct costs between them within 15 working days, OSP will contact the CBO/Dean of the Administrative Home of the award. Recognizing that no NOA will be issued until resolution, the CBO/Dean will proceed in good faith to finalize the determination of the division of direct costs, working with the collaborating unit CBO/Dean, as necessary.
 - c. Once an NOA has been received by the Administrative Home of the award, the Administrative Home should forward copies of the NOA to all collaborating units so that the collaborating units may appropriately charge all project expenses to the appropriate Smart Key.
7. Collaborating units will review the award and the dollars assigned to each participant at the time of the continuation proposal. Collaborating units must agree on the distribution of direct dollars at the time of the continuation submission or no later than 30 days prior to the inception of the continuation. If an award is made once for an entire projection period, then renegotiation can occur if the aims or the principal participants are changed.
 8. This agreement excludes all training grants (e.g. F31 and F32, T31 and T32 awards), "K" series awards, and R25 educational grants.
 9. The Office of the Vice President for Research Administration will report on the revenue shared through this policy in its standard monthly, and annual awards reports.

Related Links

- Current Version of This Policy: <http://policies.emory.edu/7.10>

Contact Information

Subject	Contact	Phone	Email
Clarification of this policy.	Kerry Peluso	404-727-0551	kpeluso@emory.edu

Revision History

- Version Published on: Jul 11, 2013 (*Clarify direct cost threshold as "per year."*)
- Version Published on: Jul 11, 2013 (*Edited Policy Details to reflect current practices.*)
- Version Published on: May 01, 2007 (*Original Publication*)

encouraged to visit policies.emory.edu to ensure that you are relying on the current version.