

Health Colleges Research Services News and Announcements FRIDAY SEPTEMBER 13, 2024

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UPCOMING EVENTS

WELCOME, INNA!

While our Pre-Award and Post-Award support widens throughout the University, we have been fortunate to bring on additional staff. As of September 3rd, Inna McNamara has officially joined our team! After nearly two decades of experience in the banking sector, Inna joined the MSU community in 2016 after her family relocated to Michigan from Arizona. During her first five years at MSU, she worked as a Pre-Award Research Administrator within the College of Natural Science. In 2021, she transitioned into a Post-Award Research Administrator role within the Department of Physiology. She will work with our pre and post-award teams to support our faculty. Inna's favorite part of being a research administrator is being able to support science! Welcome, Inna! We are lucky to have you.

JIT UPDATES WITH NIH

As of October 1st, 2024, NIH will be discontinuing the automated Just-in-Time (JIT) emails, per NOT-OD-24-165. Previously, the automated JIT emails were sent to applicants with an impact score of 30 or less to start the preparation of IRB and IACUC approvals, obtain Other Support documents, and proof of education for human subjects' research. The new process involves official communication from NIH personnel requesting the required materials from the specific awarding Institute/Center. Submission of the JIT documents will remain the same in eRACommons and will continue to be finalized by our Office of Sponsored Programs.

BUSINESS PURPOSE EXPLANATIONS BY JULIE ROBINSON

Grant funding supports specific project objectives while following all applicable federal/state/university policies. Agencies may have auditors review expenses years after the fact, so we need to ensure we are clearly document how expenses support the project at the time of payment. This is accomplished by including a business purpose explanation within the transaction document as it is processed through MSU's financial systems- KFS/ Concur/ etc.

A good business purpose explanation includes a clear description of how an expense supports the project that is covering the cost. When drafting, try to include details that cover the who, what, where, when, why, and grant funding justification (allowable/allocable/reasonable as it relates to the project).

Clear Explanation = great, good to go!

Unclear Explanation= ehhh, could use some clarification... Dr. Jones is traveling to Washington, D.C., from February 15 to 18 to attend the NIH 2025 Conference where they will present findings and meet with collaborators of their NIH health disparities project.

(clearly documents the who/ what/ where/ when/ why of the expense & how it supports the project) Traveled to Washington to meet with collaborators. (Who? When? Why? How does this support the project? If meeting with collaborators to discuss a future project that could be considered an unallowable pre-award expense)

Computer purchase for the newly hired graduate student. This student plans to work 25% on Dr. Jones' NIH health disparities project and 75% on Dr. Smith's NIH Women's Health project. The cost will be split with the grad student's appointment/ paid effort.

(expenses can be split between grant accounts when appropriate, as long as there is an explanation for how the allocation was determined)

Gift cards will be provided as participant incentives at \$10 each for initial screenings, with a \$2 activation fee per card, 40 participants expected. The list of participants will be kept on file at the department to ensure a record of issuance while maintaining confidential personal information. If any gift cards are unused, the costs of those cards will be covered by non-restricted funding.

(clearly justifies grant funding covering a potentially questionable expense-'gift' cards as project relevant participant incentives, shows due diligence of responsible record keeping) A computer for graduate student.

(Was this written into the budget justification? Would this be clear to an auditor that this supports the project covering the cost? Is this just a general-use item/ something that should be covered by indirect funding?)

Gift cards for the project. (gifts would be unallowable on grant funding, however, participant incentives provided in the form of small gift cards would be allowable and easily understood in supporting the project)

If you are planning any expenses that may fall into a grey area of being easily understood from an outside perspective, we recommend proactively including them in the proposal budget justification. For example- water or small snacks may be questioned as being allowable on grant funding, but if it is explained that these items will be provided to participants during the proposal phase and then the project is awarded, this indicates agency approval and would be considered an allowable expense.

Finally, take extra care with business purpose explanations as you approach project end dates. Auditors review these expenses more critically to ensure the items/ services are <u>needed</u>, <u>received</u>, <u>and used</u> within the project period. **Expenses must always support the project covering the costs.**

SENIOR/KEY PERSON PROFILE ORGANIZATION MODIFICATION

As a reminder, we have the ability to modify the name of the organization that translates to the SF 424 form. Please note this option to change the organization name is only available to MSU investigators and not available to HFH investigators. Please let your pre-award contact know if you'd like to change your organization from "Henry Ford Health + Michigan State University Health Sciences" to "Michigan State University" for your NIH grant applications.

RESEARCH & RELATED Senior/Key Person Profile (Expanded)

PROFILE - Project Director/Principal Investigator				
Prefix: First Name	e*: First Name	Middle Name	Last Name*: Last Name	Suffix:
Position/Title*:	Professor			
Organization Name*:	Henry Ford Health+Michigan State University Health Sciences			

PARTICIPANT SUPPORT COSTS VS. INCENTIVES

Participant Support Costs and Incentives often are misunderstood when budgeting for your research project. It is crucial to understand the definition and terms as some federal agencies do not allow these costs. Additionally, if the costs are allowable, they can be excluded from your Facilities and Administrative (F&A) base. Per the Uniform Guidance, when calculating F&A, participant support costs are removed from the direct cost base calculation for federally funded projects. For non-federal grants, the guidance should come from the direct sponsor. If the solicitation or guidelines do not state if these costs are excluded from F&A, follow the Uniform Guidance policy.

What are Participant Support Costs? Per the <u>Code of Federal Regulations</u>, "Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects." These costs do not involve work or services for the project and can be payments to students, scholars, teachers, etc. Examples of these costs are travel allowances for educational workshops (registration fees, meals, lodging, etc.), tuition if required for the project, training materials, and stipends that are predetermined at the time of award and go directly to the individual. Participant support costs are not prizes, gifts, incentives, fees paid to guest speakers, and conference support costs.

What are Incentives? Incentives are payments of low value given to participants to encourage participation in research studies. Incentives frequently require IRB approval, incur F&A, and typically are allowed by the sponsor. These items cannot be categorized as participant support cost in your budget.

If you plan on budgeting for these costs and have additional questions or require clarification, please reach out to your pre-award research administrator or email hcrs.proposals@msu.edu.



Thursday, September 19, 2024: 2:00 – 3:00 p.m. Revisions to the Fellowship Application & Review Process | grants.nih.gov

Thursday, October 17, 2024, 1:00 – 2:00 p.m. <u>NIH Grants Policy Updates: FY2025 Edition.</u> Register Here.

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