Research Notes

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PHS FCOI explained

This past August, the US Public Health Service instituted new rules regarding how we must identify, manage and report financial conflicts of interest among those having responsibility for the design, conduct, or reporting of results of any PHS-funded research project. Abiding by the new rules is a condition of acceptance of any PHS funding by the university. The rules are naturally important to those who have, and seek, National Institutes of Health or other PHS agency support. More broadly, how the new rules came about is important to anyone responsible for the conduct of research.

Under the previous PHS rules, those with key roles on a funded project were responsible for identifying and disclosing any financial conflicts of interest, i.e., any sources of income or roles in organizations outside the university that would be reasonably perceived to affect the judgments they make in the conduct of the research project. The university was then responsible for any necessary management of the conflict and for reporting its existence to the funding agency.

Expanding the Scope

The new rules expand the scope of what each investigator must disclose, the role of the university in identifying financial conflicts, and the amount of information the university must disclose to both the funding agencies and members of the general public. Each investigator must identify all financial holdings or roles in outside organizations that could reasonably be perceived as affecting the conduct of any of his or her responsibilities at the university including teaching and service as well as research. The university must then determine whether any of these would affect decisions made in the design, conduct or reporting of results of the specific project, and must report both the nature of any such conflict, and the approximate dollar amounts involved, to the funding agency. Finally, the university must respond within five days to any specific request for information from a member of the general public, disclosing both the nature of any conflicts and dollar amounts.

Precipitating Events

These changes have their genesis in failures within the academic community to assure that our principles of dispassionate inquiry and reporting of results uncolored by private interests. The major precipitating events involved revelations in 2008, first revealed through an inquiry into academic conflicts of interest led by Senator Charles Grassley, that two prominent academic psychiatrists had failed to disclose large amounts of consulting income from pharmaceutical companies while serving as principal investigators on studies related to the business of those companies.

Both academic institutions involved, Harvard and Emory, ultimately disciplined their respective faculty members. By then, it was clear that activities that reasonable people would view as rendering dispassionate inquiry the very thing that the academic community is entrusted with bringing to any topic of study—difficult at best had gone uncorrected prior to the Grassley inquiry. New rulemaking was then inevitable.

Senator Grassley had uncovered the conflicts by the simplest of means: He compared copies of conflict of interest disclosures obtained from the universities with records of payments obtained from the companies. As the new PHS rules were being developed, pharmaceutical and medical device companies had begun making public disclosures of such payments and medical schools had begun comparing faculty disclosures against the data provided by the companies. Any discrepancy required determination of whether the payments were for activity related to the faculty member’s active research projects. In essence, the new PHS policy institutionalizes this process.

Change

Change is inevitable, but it seems that with the government, it’s a way of life! In this issue of Research Notes, we highlight several key changes that affect Lehigh researchers:

PHS FCOI: See on this page an article by Alan concerning the new PHS Financial Conflict of Interest (FCOI) policy. One important note: both the training for FCOI and the certification of FCOI must be completed BEFORE SUBMISSION of your PHS proposal.

NSF GPG: Every year in January, NSF issues its Grant Proposal Guide (GPG). This year, however, a panel of reviewers sat down and suggested several significant changes in proposal development that will aid in the review process. Greater emphasis is being placed on the two elements of Intellectual Merit and Broader Impacts. There are also important format changes to NSF biosketches, project summaries, and facilities statements. See Page 2.

NSF Reporting: All NSF reports—annual, final, and project outcomes—are moving to Research.gov. Project outcomes reporting is a relatively new requirement. See Page 2.

I encourage you to frequent our webpage to stay current with new and changing government regulations: research.cc.lehigh.edu/agency-news

Tom Meischer

A Note from the Director

Office of Research and Sponsored Programs

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http://research.cc.lehigh.edu/contact-orsp

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NSF: Changes to the Grant Proposal Guide (GPG)

Effective January 14, 2013

Beginning with proposals submitted on or after January 14, 2013, the National Science Foundation has made important changes to key proposal elements.

- **Project Summary** has been revised to include three separate text boxes, to be filled in while you are in FastLane; 1) Overview, 2) Intellectual Merit; 3) Broader Impacts. The total text of all boxes should still be the limit of 1 page. A PDF upload will only be accepted if there are special characters in the project summary, and then a checkbox must be marked.

- **Project Description** has been revised to include all prior NSF support. This includes past and current funding, irrespective of its relation to the proposed project. The “Prior NSF Support” section must also include two separate sections 1) Intellectual Merit, and 2) Broader Impacts activities.

- Publications section of the biosketch has been renamed **Products**. A list of up to five products most closely related to the proposed project; and up to five other significant products (publications, data sets, software, patents, and copyrights) will be accepted.

- **Budget**: If no person months and no salary are being requested for senior personnel, they should be removed from Section A of the budget. Instead, their effort/role on the project should be defined in the Facilities, Equipment and Other Resources section.

- **Facilities, Equipment and Other Resources** has been revised to include a description of all internal, external, physical, and personnel resources available for the project. A new format for this section will become available when the changes become effective in January. Greater emphasis is being placed on this document during the review process.

- **Merit Review Criteria** has been renamed to **Merit Review Principals and Criteria**. There are 5 distinct elements listed in the new Grant Proposal Guide that should be considered when drafting your proposal. This section has been revised to also include a greater emphasis on the Intellectual Merit and Broader Impacts of the proposed project.

- There are no special instructions for proposals containing high resolution graphics; Principal Investigators will no longer be required to mail a printed copy of the application.

- **Every field in the application must be filled in before the application is submitted.** FastLane will not allow the proposal to be submitted with missing documents. For example, if there is no References Cited required in the request for applications, a statement to that effect should be uploaded to this section in FastLane.

The Office of Research and Sponsored Programs encourages all Principal Investigators to review the new Grant Proposal Guide, which is available now on the NSF website [http://www.nsf.gov/pubs/2013/nsf13004/nsf13004.jsp?org=NSF](http://www.nsf.gov/pubs/2013/nsf13004/nsf13004.jsp?org=NSF). Please e-mail or call your Contract & Grant Specialist if you have questions.

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**NSF Reporting**

**Annual and Final Reporting:** Starting in January 2013, all NSF reporting will move to Research.gov. Any annual or final reports started in FastLane should be completed and submitted by mid-December, or you will lose that information.

**NSF Project Outcomes:** For some PIs, this is a new requirement. The Project Outcomes Report (POR) is a brief summary (200-800 words), prepared for the public, of the nature and outcomes of the project, submitted in Research.gov by the PI. The report does not need to contain publications resulting from the award, as NSF automatically includes those as part of Research.gov’s **Research Spending and Results**. The report should contain information about products that have resulted from the award such as collections, data sets, software and educational materials. Instructions for preparing and submitting the POR are available by logging onto Research.gov and clicking on **Project Outcomes Report**.
Don’t Give Up on the One Card Program!

By now many of you are becoming adapted to OneCard. As of July 1, it has replaced our paper-based expense reimbursement process.

The first growing pain we know you experienced is the fact that even though the program is called "OneCard" – many of you have two cards: one department card and one strictly for sponsored research. Please use the research card only when it is sponsored research. Use your department card for all other accounts including your Incentive Fund.

The reimbursement rules are still the same: detailed receipts (not just the credit card receipts) are needed for all items of $25.00 or more; Fly America rules apply on federal funds; no alcohol; attach conference information; out-of-pocket foreign currency needs the USD amount and exchange rate on each receipt; etc. And please save all your receipts - it is recommended that you retain your receipts for at least one year since this is a new process.

For those that aren’t in a routine yet, we suggest the following steps. When you are notified that the monthly statement has arrived:

1. Verify each expense and put your receipts in the order of the statement – preferably numbering each one according to the statement items. For Out-of-Pocket, number them as OOP#1, etc.

2. Enter a complete description. If you paid for others, add their names and business affiliations; if it is a hotel receipt, put the dates in; if it is a conference, add the conference name, dates and location. Did you know you can use the “copy down” process to avoid typing the same description over?

3. Choose the research grant you will be charging and the general ledger code by clicking on the magnifying glass next to the field and selecting the appropriate number.

4. Enter any Out Of Pocket items by first clicking the Out-Of-Pocket tab then click Add an Expense. Continue similar to the above for descriptions, codes, etc.

5. Print out your cover sheet which contains the bar code and date for the statement time period. Put your receipts behind the cover sheet and fax to Wells Fargo OR scan the pages as one pdf file and email it to Wells Fargo. Both contact numbers are on the cover sheet.

6. Once you are satisfied that everything is entered properly, click “Cardholder Review.” Your Approver will be notified that your statement is ready to be approved.

If you prefer, you can work on items 1 through 4 throughout the month. When you log into OneCard before the statement cycle has been completed, you can click on “Cycle-To-Date” and enter information such as descriptions, account codes, etc. for both the charge and out-of-pocket sections.

As we adapt to this system, keep in mind there are many worthy attributes, for example:

• We all receive email reminders to review, reconcile and approve the statement.
• Your statement/receipts cannot get lost in the mail, it’s electronic!
• For standard charges, the system will apply the proper exchange rate when using foreign currency.
• Out-of-pocket expenses such as mileage are simpler. Enter the travel distance, a description and choose the Lehigh rate. The system does the calculations!
• Let’s not forget that the out-of-pocket reimbursement will be direct deposited to your personal account. Now that’s convenient!
• Last but certainly not least, it’s yet another innovative approach that Lehigh University is taking to help save our environment!

Diane Mason

PHS FCOI—continued

and adds a new level of required public disclosure.

More Information

Full information about our implementation of the PHS policy can be found through our Research Integrity web page at research.cc.lehigh.edu/research-integrity and also on the ORSP Policies and Procedures page at research.cc.lehigh.edu/policies. Information from NIH is at grants.nih.gov/grants/policy/coi/index.htm. Investigators who have questions or concerns should contact Tom Meischeid with any questions.

Alan Snyder

Helpful Do's & Don'ts:

DO type up a two-three sentence summary explaining your travels – similar to the top portion of the paper form: state the business purpose, location, date and names of those your expenses covered, if any – this summary can be added to your Cover Sheet.

DO put your receipts in the same order of the statement.

DO attach back up for trip mileage or currency exchange rates so the reviewer doesn’t need to look up what you already looked up to complete your statement.

DO NOT expect reimbursement for alcohol on a research grant. Use the split and reclassify to mark alcohol as personal. Prior permission is required for alcohol on non-research indexes.

DO PRINT separate cover sheets for your department card & research cards each month – the bar codes are unique for every account and every month.

DO NOT fax both your department card & research card receipts together – it must be two separate faxes or emails to end up in the appropriate places.

DO ASK FOR HELP if you have questions (Diane x83022 or Christina x83023)
Opportunities for Research Funding

MARCH
Human Frontiers Science Program
www.hfsp.org
HFSP Young Investigators’ and Program Grants
Award Amount: up to $450,000
Grants support international and preferably intercontinental basic research collaborations focused on understanding complex mechanisms of living organisms.

American Chemical Society
www.acs.org
ACS Petroleum Research Fund
Award Amount: $100,000
Grants to support fundamental research related to petroleum or fossil fuels.

March of Dimes Foundation
www.marchofdimes.com
Basil O’Connor Starter Scholar Research Awards
Award Amount: $150,000
Grants support junior independent investigators undertaking basic research to prevent birth defects, premature birth and infant mortality. Application is by nomination of dean, department chair or center director.

APRIL
March of Dimes Foundation
www.marchofdimes.com
Award Amount: $100,000
Grants support basic research to prevent birth defects, premature birth and infant mortality.

Google
research.google.com/university/relations/research_awards.html
Award Amount: $10,000-$150,000
Grants support academic research to improve information access.

Gates Foundation
www.grandchallenges.org
Grand Challenges Explorations
Award Amount: $100,000
Grants foster scientific and technological innovation to solve key health problems in the developing world.

Foundations

William T. Grant Foundation
www.wtgrantfoundation.org
Award Amount: $100,000+
Grants support research with a focus on understanding and improving social settings for youth in the United States.

MAY
Spencer Foundation
www.spencer.org
Award Amount: small grants up to $40,000; large grants up to $500,000
Grants support research to improve education around the world.

Reminder!
All government agency proposals submitted on behalf of the University must be run through the Office of Research & Sponsored Programs. In most situations, proposals that are not submitted by an Authorized University Official will be returned by the agency without review. There are rare circumstances where the PI can submit directly to the agency, however be aware that if the award will be made to the University (and not the individual), the proposal needs to be reviewed by our office before it can be accepted. Therefore we strongly encourage anyone planning a proposal submission to contact us early so that we can guide you through a proper submission and avoid costly delays and rejections.

As soon as you are considering a proposal submission, let us know by filling out this form with as much information as you currently have available: http://research.cc.lehigh.edu/content/orsp-notice-intent-submit-proposal

Kathy Zimmerman

LEHIGH INTERNAL FUNDING PROGRAMS
www.lehigh.edu/~inresrch/intfunding.html

FRG: Faculty Research Grants
(October 2012 and March 2013)

FIG: Faculty Innovation Grants
(March/April 2013)
More information for both these and other Internal Lehigh awards for research is available at the Finding Funding webpage on the Research Website

Limited Submissions
research.cc.lehigh.edu/limited-submissions

Partnership for International Research and Education (PIRE) - expected in 2013, offered every two years (Jan./Feb.)

Major Research Instrumentation (MRI) - due to NSF on February 21, 2013

Integrated Graduate Education and Research Training (IGERT) - usually due in January

Other

NIH: Shared Instrument Grant Program (S10) - due date: March 21, 2013

Workshops

NSF CAREER Awards for un-tenured Assistant Professors July 2013 NSF submission deadlines, workshop at Lehigh in Spring 2013

Faculty Peer Exchange Workshop series: ongoing

Sujata Jagota