SUBJECT: Administration of Research Funds Standard Operating Procedures (SOP)

PURPOSE The purpose of this SOP is to define policy, procedure and responsibilities of the MVARCS Research Office with respect to administration of research funds, in accordance with the references. NOTE: VA investigators are sometimes consultants or co-investigators on awards to non-VA researchers. This policy does not apply to that situation since the VA investigator is not the awardee. This research may require RDC approval if the VA investigator is using VA time, VA resources (e.g., his or her office, VA computer), or VA property to work on the project.

1. DEFINITIONS
AO: Administrative Officer
ACOS/R: Associate Chief of Staff for Research
IACUC: Institutional Animal Care and Use Committee
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Institutional Review Board (IRB): An IRB is a board, committee, or other group formally designated by an institution to review, approve, require modification in, disapprove, and conduct continuing oversight of human research in accordance with 38 CFR Part 16 and other applicable VA and Federal requirements. (VHA Handbook 1200.05 3.jj.)
MVMREF: Minnesota Veterans Medical Research and Education Foundation. A non-profit research and education corporation created pursuant to title 38§§7361 through 7366, United States Code. (VHA Handbook 1200.17)
Subcommittee for Research Safety (SRS): A subcommittee dedicated to ensuring personnel safety in Veterans Health Administration (VHA) research. (VHA Handbook 1200.08)
VA Research: VA research is research conducted by VA investigators (serving on compensated, work without compensation (WOC), or Intergovernmental Personnel Agreement (IPA) appointments) while on VA time, utilizing VA resources (e.g. equipment), or on VA property including space leased to, or used by VA. The research may be funded by VA, by other sponsors, or be unfunded. (VHA Handbook 1200.01 3.b.)

2. ENTITIES THAT MAY ADMINISTER FUNDS FOR VA APPROVED RESEARCH
According to VHA Handbook 1200.2 section 3.b (a) the following entities may administer funds for VA-approved research, in accordance with applicable law and VA policy:

a. VA medical centers administer all intramural funds, all funds in the General Post Fund earmarked for research, and all funds received from another Federal agency under an interagency agreement (VA Manual Mp-4, Pt. V and VHA Directive 4721).

b. VA nonprofit research corporations administer all funds that the corporations receive. Medical centers may transfer any funds not appropriated to the Department to a VA nonprofit research corporation (VHA Handbook 1200.17). NOTE: If approached by a potential donor or grantor interested in supporting VA research, a VA official may not direct the donor to deposit the funds with any entity other than VA or a VA nonprofit corporation.

c. Affiliated schools and universities and nonprofit organizations (other than a VA nonprofit research corporation) may administer funds for VA research if authorized by a VA medical center Director.

d. For VA investigators with a University of Minnesota faculty appointment, NIH funding will be administered by the University of Minnesota. For VA investigators without a University of Minnesota faculty appointment, NIH funding administration will be determined on a case-by-case basis by the ACOS/R.
3. **COMMUNICATION WITH INVESTIGATORS**
a. The ACOS/R will send out an email message on a yearly basis reminding investigators about the rules governing administration of research funds (See Section 2 and example in Attachment A.)

4. **REPORTING REQUIREMENTS FOR INVESTIGATORS**
a. **Initiation of Research** The forms required to initiate a research project all require the investigator to indicate both source of funding and funding administrator. This includes the Request to Review Research Protocol required for human studies and lab-only studies; the Animal Component of Research Protocol (ACROP) required for animal studies; and the R&D Review of Research Project required for R & D only studies.
b. **Continuing Review** All Continuing Review Forms require investigators to indicate if the funding administrator has changed (See Section 5b.)

5. **MONITORING PROCEDURES IN RESEARCH OFFICE**
a. **Initiation of Research** All forms are reviewed and entered into the ePromise system by staff in the IRB office who will forward for further review any studies in which the funding administrator is not clearly listed as VA, MVMREF, or the University of Minnesota. ACOS/R or the AO will review the study and determine if the funding administrator is allowable based on the guideline (see above section 2)
b. **Continuing Review** All Continuing Review Forms include this question: *Has the funding administrator (e.g. VA, University, MVMREF) for this project changed since your last continuing review?: Y/ N, if Yes, please specify current funding administrator.*

If the funding administrator has changed to anything other than VA, MVMREF, or the University of Minnesota, staff of the R&D committee or of the subcommittees who review these forms will forward the information to the ACOS/R or the AO who will determine if the funding administrator is allowable based on the guideline (See section 2).

6. **REFERENCES**
   - VHA Handbook 1200.2
   - VHA Handbook 1200.08
   - VHA Handbook 1200.17
   - VHA Handbook 1200.01
   - VHA Handbook 1200.05

7. **RESCISSION:** October, 2014

8. **EXPIRATION DATE:** N/A

9. **FOLLOW-UP RESPONSIBILITY:** Research and Development (R & D) Committee

   Hanna E. Bloomfield, MD, MPH  Date  Ronald R. Bach, PhD  Date
   Associate Chief of Staff, Research  Chair, R & D Committee
ATTACHMENT A: Example of Email to be sent yearly to Investigators from ACOS/R

1. Funds in support of VA Research* from any entity except VA must be administered either through the
   a. Minnesota Veterans Medical Research and Education Foundation (MVMREF, formerly MVRI)
      (e.g., for studies funded by federal agencies, industry, or foundations) or
   b. University of Minnesota for NIH grants
   c. Another non-profit organization, only if specifically authorized by the MVAHCS Director.
      This includes the Minnesota Medical Foundation (now folded into the University of Minnesota
      Foundation)

2. Although we can respond to RFPs or other requests to collaborate on research activities with drug or
   device companies, as VA employees we are NOT allowed to solicit funds from these entities. These
   collaborative efforts must be formalized through CRADAs (Cooperative Research and Development
   Agreements) which are reviewed by VA attorneys and signed by the MVAHCS Director, who is the only
   one authorized to sign off on proposed commitments of the medical center to a study.

*VA Research is research that is 1. VA funded, AND/OR 2. conducted on VA time (includes WOC time)
AND/OR 3. otherwise uses VA resources