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Documentation and Instructions: ISMMS as a Subaward on a Sponsored Project Application

Introduction

The purpose of this memo is to inform you of the required documentation you will need to provide to the prime institution and to the GCO when ISMMS is a subaward on a sponsored project application as well as the pertinent extramural and internal policies and procedures. It also includes information specific to NIH competitive applications. The terms “sub-award” and “sub-recipient” are used interchangeably. The memorandum is organized in the following sections:

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The sections in this memo highlighted in yellow are instructions on placement of documentation in InfoEd.

Please contact your assigned GCO Grants Specialist for any questions you may have. For a listing, please click [here](#):

I. Documentation

Prime Institution

Please obtain instructions regarding any documents and information the prime institution will require. The GCO will provide a Statement of Intent regardless of whether or not the prime institution requires.

GCO requests that you upload the instructions you receive from the prime institution in your InfoEd application > Internal Documents tab.

Below are documents that the prime site may require.

1. Statement of Intent to Establish (SOI) a Consortium Agreement – *ISMMS prepares and signs this statement*
2. Statement of Work (SOW) for new/competitive and non-competitive applications, or Confirmation of No Change for non-competitive applications and no cost extensions
3. Budget for new/competitive and non-competitive applications
4. Budget Justification for new/competitive applications

ISMMS GCO

Any documents that the prime institution requests from you, you must also submit those to the GCO as part of your InfoEd application. GCO always requires #2 – 4 for new/competitive and non-competitive applications as specified above. GCO also requires the following documents:

5. Proposal Sections related to ISMMS's participation or a Progress Report

For competitive applications, you only need to include sections of the proposal related to ISMMS' participation if the SOW does not adequately provide information on your participation. Please see the instructions in Section III. for additional information.

For non-competitive and no cost extension applications, include a progress report.

NIH Competitive Applications

The prime institution may also request these additional documents for NIH competitive applications:

6. Certification of Compliance with HHS Federal Conflict of Interest (COI) rules and regulations effective 8/24/2012 – *This COI certification is already included in ISMMS's SOI.*
7. ISMMS' Performance Site Information
Institution Name, Address, Country, DUNS #, Congressional District
8. Resources and Facilities page, including equipment
9. Biosketches for Key Personnel including Other Significant Contributors and Consultants
10. Letters of Support
11. Inclusion Enrollment Report data for projects with human subjects, if applicable

II. Checklist: ISMMS as a Subaward on a NIH Competitive Application

This checklist for NIH competitive applications is a tool designed to assist the ISMMS Subaward PI and his/her research team with the following tasks:

1. Obtain the administrative and budgetary information you will need from the prime institution such as the project period dates, budget amount, funding opportunity announcement information, their deadline for submission of your materials, and the documentation the prime institution needs.

2. Submit all required information and documents to the prime institution.

The checklist entitled “NIH Competitive Subaward Checklist: ISMMS as the Subawardee” can be downloaded [here](#).

To use, complete the appropriate sections of the checklist and forward it to your contact at the prime institution with the required documents.

Your InfoEd application is due to the GCO in COMPLETE AND FINAL form, including completed and signed Conflict of Interest and Suspension and Debarment forms as appropriate, 1 business day prior to the prime institution’s deadline for your materials.

If you use the checklist, please upload it into your InfoEd Ed > Internal Documents tab.

III. Additional Instructions

1. Statement of Intent (SOI) to Establish a Consortium Agreement

This Statement of Intent is also commonly referred to as “Subcontracting Letter of Agreement,” “Consortium Letter of Intent,” and “Letter of Commitment or Intent Signed by the Consortium Participant” among other variations. The SOI is the official letter signed by your designated GCO Authorizing Organization Official (AOR) attesting that ISMMS is aware of all applicable Federal regulations and policies and will establish a subaward agreement. **Failure to obtain a signed SOI may result in the prime institution removing ISMMS from the project.** GCO only issues the SOI after review and approval of your InfoEd application so please be sure to submit your application.

Also, please note that the actual signing of the subaward agreement by the Prime Institution and ISMMS will occur at a later date if the project is funded. This statement does not take the place of the agreement.

Although standard practice is for the GCO to prepare and sign this form, some PIs/Departments opt to complete and include it in the InfoEd application for ISMMS AOR signature. The template is available on line at:

<http://icahn.mssm.edu/research/portal/resources/gco/application>

Then go to > Forms > “Subaward Statement of Intent Template: ISMMS as the Sub-Awardee Institution”

This template is only used for NIH sponsored projects and other HHS agencies, such as AHRQ, CDC, FDA, HRSA, SAMHSA, which are listed on the Federal Demonstration Partnership (FDP) website and abide by the Federal COI policy revised 8/24/12.

If you complete the SOI form for GCO AOR signature, please include it in your InfoEd application > Internal Documents tab. Choose the “Subaward Statement of Intent to Establish a Consortium Agreement” category.

2. Statement of Work (SOW) or Confirmation of No Change

For competitive applications, include a SOW.

For non-competitive and no cost extension applications, include a SOW or confirmation statement from the ISMMS Subaward PI that there is no change.

The confirmation document can be a memo or a sentence in the Progress Report from the ISMMS Subaward PI stating, "I confirm there is no change to the Statement of Work."

A Statement of Work is a description of the work the sub-awardee institution will perform. The SOW will be part of the legally binding subaward agreement if the project is funded. There is no template since it is project specific. The document at a minimum should include the objective or purpose of ISMMS' participation and a general description of the actions to be performed by ISMMS and the expected results.

Please include the SOW or confirmation in your InfoEd application > Internal Documents tab. Choose the "Subaward Statement of Work" category.

If the confirmation is part of your progress report, please upload your progress report in your InfoEd application > Progress Report tab.

3. Budget

GCO requires as much budget information and documentation as the prime institution requests. Also please consult with your department's administration for other internal requirements and procedures.

Fringe and Indirect Cost Rates

When you are preparing a budget, you must find out the funding source from the prime institution. It is the funding source that determines whether you use ISMMS' federal or non-federal fringe benefit rate and ISMMS's federal, non-federal (non-profit), or industry indirect cost rates.

For example, if you are working with an academic medical center on a clinical research project and the medical center will receive funding from a pharmaceutical company, you would use the non-federal fringe rate and the industry sponsored clinical trial indirect cost rate on your budget. If you are working with an academic medical center on a clinical research project and the medical center is applying for a Department of Defense grant, you would use the federal fringe and indirect cost rates on your budget.

For a list of ISMMS' fringe and indirect cost rates and additional budgeting instructions, please click [here](#).

Application Types

a. Competitive Applications

As stated above, GCO requires as much budget information and documentation as the prime institution requests. In the case of NIH modular grants, at a minimum, the InfoEd budget must include all personnel, other direct costs, F&A, and total costs for the initial and entire proposed period of support.

b. Non-Competitive Applications

The GCO requires the budget for the upcoming budget period only. If this was originally an NIH modular grant, you will need an InfoEd budget that a minimum includes all key personnel, other direct costs, F&A, and total costs.

c. No Cost Extensions

Only in the case where the prime site requires a budget endorsed by an authorizing organization representative (AOR), does the GCO also require the budget. Please consult with the prime institution for additional information. If the prime institution requests that the budget is endorsed by an AOR, please send the request with the appropriate budget forms to your designated GCO Grants Specialist.

a. – c. *above*:

In addition to data entering the budget into the InfoEd budget tab, when the budget form is part the funding agency application (e.g., new private foundation grant application that has a budget form) or requested by the Prime Institution, upload it in InfoEd > Research or Program Plan tab for new projects and the InfoEd > Progress Report tab for all others. Alternative: Upload in InfoEd > Internal Documents tab

When the budget form is not part the funding agency application forms (e.g., NIH R01 NCC,) the InfoEd budget by itself is sufficient.

4. Budget Justification

GCO requires as much budget information and documentation as the prime institution requests. For NIH modular grants, provide a budget narrative for all Personnel (e.g., subaward PI, TBN post doc, consultants). For NIH non-modular grants, provide a detailed budget justification. Please refer to the agency instructions for all other applications.

If the budget justification is part of the documents requested by the funding agency, upload into the “Research or Program Plan” tab for new projects and the “Progress Report” tab for all others.

5. Proposal Sections related to ISMMS’s participation or a Progress Report

For competitive applications, you only need to include sections of the proposal related to ISMMS’ participation if the SOW does not adequately provide information on your participation. **If your SOW provides sufficient detail of your participation on the project, you do not have to submit any additional proposal sections.** For example, if you are participating in aims 2 and 3 of the proposal and the SOW refers to these aims but provides no further information, then please do provide aims 2 and 3 of the proposal.

For non-competitive and no cost extension applications, include a progress report. A progress report includes these sections as follows:

- a. Concisely summarize progress during the past year and/or life of the protocol. Include a list of abstracts and publications not previously reported.
- b. Clearly describe any revisions in the SOW for the next year including:
 - i. Additions or deletions (indicate differences from original protocol)

- ii. Rationale for changes, or
- iii. A statement that the continuation protocol is not different from the original protocol.

Upload the proposal sections into the “Research or Program Plan” tab for new projects and the progress report in the “Progress Report” tab for all others.

NIH Competitive Applications: Additional Documentation

Numbers 6 – 12 below are additional instructions for NIH competitive applications.

6. Certification of Compliance with HHS Federal Conflict of Interest (COI) rules and regulations effective 8/24/2012

The appropriate statement attesting to ISMMS’ compliance is included in the SOI the GCO signs.

7. Performance Site Information

The prime institution will need to enter ISMMS’ name, address, country, DUNS number, and congressional district number on the NIH Application. The “Checklist” in section II above includes this information.

8. Resources and Facilities page

The NIH instructions state, “If there are multiple performance sites, describe the resources available at each site.” Provide an additional equipment statement, if applicable. “List major items of equipment already available for this project and, if appropriate identify location and pertinent capabilities.”

Upload the Resources and Facilities page in InfoEd> Research or Program Plan tab.

9. Biosketches for Key Personnel including Other Significant Contributors and Consultants

As per the NIH instructions, please provide a biosketch for senior/key personnel and other significant contributors.

Upload the Biosketches in InfoEd> Research or Program Plan tab, Personnel tab, or Internal Documents tab.

10. Letters of Support

As per the NIH instructions, “Obtain appropriate letters of support, including any letters necessary to demonstrate the support of consortium participants and collaborators such as Senior/Key Personnel and Other Significant Contributors included in the grant application. Letters are not required for personnel (such as research assistants) not contributing in a substantive, measurable way to the scientific development or execution of the project. Letters should stipulate expectations for co-authorship, and whether cell lines, samples or other resources promised in the letter are freely available to other investigators in the scientific community or will be provided to the particular investigators only. For consultants, letters should include rate/charge for consulting services and level of effort/number of hours per year anticipated. In addition, letters ensuring access to core facilities and resources should stipulate whether access will be provided as a fee-for-service.”

Upload the Letters of Support in InfoEd> Research or Program Plan tab or Internal Documents tab.

12. Inclusion Enrollment Report Data for projects with human subjects, if applicable

If the Inclusion Enrollment Report (IER) form is required for your research, the prime institution may request data from you so they can include on the NIH Inclusion Enrollment Report form.

Upload the document with the information in InfoEd> Research or Program Plan tab or Internal Documents tab.

13. Multiple PI/PD Leadership Plan, if applicable

If this is a multiple PI (MPI) grant and the ISMMS Subaward PI is one of the MPIs, please include the MPI plan with your InfoEd application.

Upload the MPI plan in InfoEd> Research or Program Plan tab or Internal Documents tab.

14. Data Entry on InfoEd Budget and Personnel tabs

Enter the budget in InfoEd > Budget tab and the personnel in InfoEd > Personnel tab.

You can data enter the budget and personnel in its entirety or follow the shortcut instructions in the table below.

Data Entry on InfoEd Budget and Personnel tabs	
Budget Tab Instructions	Personnel Tab Instructions
Enter the following budget information in “Budget Items”:	Enter the names of the following personnel:
1. All personnel with % effort, fringe and salary \$s requested 2. When the funding source is <u>federal</u> , you must itemize the following costs and choose the appropriate “Budget/Charge category”: a. Equipment (defined as equal to or greater than \$1,500) b. Equipment Software (defined as equal to or greater than \$1,500 and non-renewable) c. Patient Care Costs (choose outpatient or inpatient) d. Tuition & Fees e. Other Costs> Genomic Arrays f. Graduate Student Direct Compensation g. Graduate Student Health Insurance 3. Cumulative Direct Cost (DC) - Enter one <u>cumulative</u> amount combining all Other than Personnel Costs into “Other Costs.” 4. <u>Upcoming</u> year’s budget only	1. All personnel including TBN positions and paid consultants.

Costs 2 a. – e. above are excluded from overhead on federally sponsored projects. They must be itemized as specified above for the InfoEd program to correctly calculate F&A. For federal projects with genomic arrays, you will need to manually enter the F&A.

Regarding costs 2 f. and g., do not enter salary and fringe amounts for graduate students participating on your project. Do enter costs as noted above. Please remember that you still need to enter the graduate student’s name in the Personnel tab of InfoEd.

15. Participation as a Subaward on a Subaward

The GCO discourages Mount Sinai's participation as a subaward on a subaward. This occurs when the prime institution submitting the application issues a subaward to a sub-awardee institution, who then in turn, issues a subaward to a third tier institution. Mount Sinai's participation either as: 1) a third tier institution, or 2) as a second tier institution that issues a subaward, will add unnecessary bureaucratic burdens as well as administrative and financial delays to your project. The GCO understands that the desire to use subawards on subawards is often driven by scientific reporting lines. These scientific reporting lines can be preserved without adding extraneous institutional financial and administrative reporting lines. The direct subaward arrangement between the prime institution and Mount Sinai expedites both the research project as well as the receipt of funds. Please contact your designated [Grants Specialist](#) if you have any questions.

16. NIH Application Instruction Guide

Refer to [SF424 Application Guide](#) for complete instructions on the NIH sections included above.

IV. GCO Subaward Contacts for Submitting Subaward Application and Agreement/Amendment

Please refer to these resources for finding your designated contacts in the GCO.

- [GCO Departmental Assignments](#)
- [GCO Assignments by Team](#)

When submitting the subaward *application* in InfoEd, the Grants Coordinator does the initial intake, the application is reviewed by the Grants Specialist, and the Authorized Organization Representative (AOR) signs the letter of intent to establish a consortium agreement.

If you receive a subaward *agreement or amendment*, please send the agreement to contracts@mssm.edu. The Contracts Coordinator and Contracts Specialists access this mailbox. The Contracts Coordinator coordinates review and sign off, the Contracts Specialist reviews and negotiates the agreement, and the AOR is the signatory.

V. Significant Changes to this Document from Prior Versions

<u>Date</u>	<u>Description</u>
9/2025	Added GCO Subaward Contact section.
11/6/2023	Added statement that the GCO will provide a Statement of Intent regardless of whether the prime institution requires.
6/22/2020	Removed sIRB Reliance Statement, if applicable, in Section III.11. No longer required for competitive applications due 5/25/20 or later.
3/22/2018	Added sIRB Reliance Statement, if applicable, in Section III.11.
3/22/2018	Updated the Inclusion Enrollment Report data requirement, if applicable, in Section III.12.
4/11/2016	Added information about "PHS 398 Inclusion Enrollment" form for applications with dues dates 5/25/16 and later in Section III.12.

4/11/2016	Updated the equipment and equipment software threshold from \$500 to \$1,500 in section III.13
4/11/2016	Added Participation as a Subaward on a Subaward section III.14