

Assigning Appropriate Credit for Sponsored Research Activities

Background.

Consistent with one of the primary objectives of the National Institutes of Health Roadmap, faculty at the Health Science Center (HSC) continue to expand their research activities from those conducted by a single investigator to multi-investigator and/or multidisciplinary programs. In addition, the HSC recognizes that many research activities are organized around a Center and outside the boundaries of the traditional academic department. However, it is also important to recognize the primary department of an investigator in reporting our research activities. Consequently, there is a need to further segment our traditional reporting of award and expenditure activity to recognize multi-investigators, multiple departments, and Center activities.

Policy.

The HSC has developed a “credit for all sponsored research activity” policy that will go into effect September 1, 2006, that will externally¹ credit each department in which an investigator holds a primary faculty appointment and internally credit both the department and center affiliation of each faculty member both tenure and non-tenure track. Credit for individual investigators on multi-investigator projects will be apportioned on a departmental, school, and, separately, on a center basis and will be made on the basis of intellectual contribution, resource allocations, expenditures, or the like. The only exceptions to this policy will be those projects that have traditionally required multiple project ids (accounts) for individual activities. Examples of these projects would be those funded through the NIH P-mechanism. For those projects that traditionally allocate credit through the use of multiple project ids (accounts), credit will continue to accrue on a project id basis.

Implementation and Procedures.

Implementation of this policy will require that, where applicable, an assignment of credit on a percentage basis will be made either at the time of proposal submission or, if a formal proposal is not submitted, at the time of award. The current Certificate of Proposal (COP) will be modified to allow for such apportionment based upon agreement at the time of proposal submission between the appropriate department chairs in consultation with the faculty investigators. In addition, where there are Center affiliations or memberships, these will also be noted on the COP and recognized separately. The Office of Sponsored Programs (OSP) will record the apportionment and use it to allocate award and expenditure data to primary departments as well as Centers.

Once implemented, the current awards and expenditures reports issued by OSP will be issued in three formats. The first will present the data as it is currently being presented: awards will be credited to the primary department of the investigator named on the award. The second will recognize apportionment by academic department based on the intellectual contribution agreed upon at time of COP approval. The third will report only those award and expenditure data attributable to Centers.

Examples.

¹ The primary example of external credit is the department ranking listing maintained and issued by the National Institutes of Health.

1. Dr. X in Microbiology will collaborate with Dr. Y in Biochemistry. Dr. X will serve as the named investigator on the proposal. It is determined by the Microbiology and Biochemistry department chairs that the intellectual apportionment should be 60% to Dr. X and 40% to Dr. Y, regardless of what academic unit incurs the cost. Only one project id (account) will be established for this award. The resultant award and expenditure reports would be as follows:

- Traditional report: 100% credit will be attributed to Microbiology
- Apportionment report: credit will be attributed 60% to Microbiology and 40% to Biochemistry
- Center report: awards and expenditures for this project will not be part of the Center report

2. Dr. Z in Medicine is submitting a single investigator award with no other faculty investigators and has no Center appointments or memberships. No apportionment will be required. Resultant award and expenditure reports will be as follows:

- Traditional report: 100% credit will be attributed to Medicine
- Apportionment report: 100% credit will be attributed to Medicine
- Center report: awards and expenditures for this project will not be part of the Center report

3. Dr. K in Nursing is a member of both the Barshop Center and SACI and has submitted a single investigator proposal with no other faculty collaborators. No apportionment will be required and the resultant award and expenditure reports will be as follows:

- Traditional report: 100% credit will be attributed to Nursing
- Apportionment report: 100% credit will be attributed to Nursing
- Center report: 100% credit would be reported as both a Barshop and SACI award.

4. Drs. A (Pediatrics), B (Pediatric Dentistry), and C (Pharmacology) plan to submit an R01 proposal to NIH. Dr. A has a cross appointment with the Children's Cancer Research Institute (CCRI). Dr. A will be the named investigator on the award. The apportionment has been made at an equal 33 1/3% for each investigator. Only one project id (account) will be established for this award. The resultant award and expenditure reports would be as follows:

- Traditional report: credit would be given to the to Dr. A's primary department
- Apportioned report: each faculty member's contribution would be allocated to their primary academic department
- Center report: Dr. A's 33 1/3% apportionment would be reported as a CCRI award.

5. Dr. Q will be the project director on a P01 (program project) proposal to NIH. Three cores and four individual research projects each headed by individual faculty members are part of the proposal. One of the research projects is headed by a faculty member who has a cross appointment with the Children's Cancer Research Institute (CCRI) and the entire program is under the auspices of the Barshop Institute. Multiple project ids based on budgets will be created. The resultant award and expenditure reports would be as follows:

- Traditional report: credit would be given to the primary departments of the individuals in whose name each project id has been established

- Apportioned report: 100% will be apportioned on the basis of the department housing the project id
- Center report: the research project headed by the faculty member with the appointment in CCRI will be credited to CCRI

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- In 2006 the National Institutes of Health (NIH) began to implement a Federal-wide policy to allow formally more than one Principal Investigator (PI) on individual research awards. The overarching goal is to encourage collaboration among equals when that is the most appropriate way to address a scientific problem.
- In September 2006 the institution adopted a policy for **Assigning Appropriate Credit for Sponsored Research Activities** (<http://www.uthscsa.edu/ogm/forms/copinstructions.doc>). This policy was adopted to appropriately credit faculty effort and administrative unit contributions to the success of research programs.
- The policy externally credits the department in which the principal investigator holds a primary faculty appointment and internally credits both the department and center affiliation of each faculty member, both tenure and non-tenure track.
- The external credit portion of the policy will remain unchanged until and at which time the NIH changes its research rankings mechanism. We will also continue to produce three reports:
 - awards credited based on the primary academic department of the PI
 - multi-investigator awards recognizing multiple departments, and
 - awards attributable to Centers.
- Credit internally for individual investigators on multi-investigator projects is apportioned on a department, school, and, separately, on a center basis and is predicated on intellectual contribution, resource allocations, expenditures, or the like.
- The implementation of this policy requires that, where applicable, an assignment of credit on a percentage basis will be made at the time of proposal submission.
- The apportionment of credit among the respective units is based upon agreement at the time of proposal submission among the appropriate department chairs and center directors, in consultation with the faculty investigators.
- Center affiliations or memberships are also be noted on the COP and recognized separately.
- A key feature of this policy was that the Department/Center/Institute allocation of credit was to be a percentage that is agreed upon by the investigator, department chair and Center/Institute director.
- This amount should be based on the percentage determined by the utilization of resources that the Department/Center/Institute is providing to the project being proposed.
- Since the implementation of the policy, the Office of Sponsored Programs has received several COPs in which the center directors and department chairs have not been able to come to agreement about splitting of credit for this activity.
- Therefore, a change in the policy to include the following guidelines for apportionment of credit is being recommended.
- **Department that provides the faculty appointment: 20%.**

- **Unit (Department or Institute/Center) that provides administrative and grant support (i.e. accounting, payroll, human resources, compliance, credentialing): 10%**
- **Unit (Department or Institute/Center) that provides salary support: 25%. This could be divided proportionately based on salary contribution by each unit. The unit that takes on the risk for salary coverage when grant sources decrease receives recognition in the allocation of credit for salary support. In the case of faculty who receive a portion of their salary from the VA, this amount is credited to the appropriate affiliated academic department (e.g. Medicine, Radiology, Psychiatry, C & SB, Biochemistry, Pharmacology, etc.), unless the funds are derived from the faculty member's VA grant.**
- **Unit (Department or Institute/Center) that provides laboratory/office space: 25%. This could be divided proportionally based on space contribution by each unit.**
- **Unit (Department or Institute/Center) that provides funds for recruitment and research start up: 20%. This one-time cost could be divided proportionately, based on contribution to the start up funding by each unit. The credit for start-up counts only for the first 3 years, after which the salary and space categories above are each incremented by 10%.**