School of Medicine Guidance for Joint Appointment MOUs

Purpose

To provide school-level guidance for completion of a memorandum of understanding for faculty who conduct sponsored research with joint University and Department of Veterans Affairs appointments.

This document applies to all individuals with paid appointments in Virginia Commonwealth University’s School of Medicine (VCU) who participate in sponsored research and hold a joint appointment with a Veterans Affairs Medical Center (VAMC).

Requirement

A Memorandum of Understanding (MOU) is required to document the appointment title and total professional responsibilities for an investigator who holds paid appointments at both VCU and a VAMC.

VCU’s Office of Sponsored Programs (OSP) requires, at the point of proposal approval routing, that Schools certify a current MOU is on file for all joint VCU/VAMC appointees.

The MOU must:

- Include disclosure of the breakdown of total professional effort between VCU and the VAMC appointments.
- Include the percentage of effort assigned specifically to research at both VCU and the VAMC.
- Include certification from appropriate parties at both VCU and the VAMC that there is no possibility for dual compensation for the same work; or of an actual or apparent conflict of interest.
- Be updated no less than annually

Relevant Attachment: SOM Template for VCU/VA Joint Appointment MOU

Process for Maintaining Accurate & Current MOUs:

- MOU’s must be updated no less than annually.
- SOM Research Administration will initiate annual MOU updates to be completed in July to coincide with the annual faculty contract cycle.
  - Departments will be provided a list of faculty who appear to need a current MOU in place. Departments must review and update the list as needed to ensure all those with joint appointments conducting sponsored research are identified.
  - Departments must work with investigators to complete an MOU.
- Departments are responsible for initiating mid-year updates to MOUs when:
- There is a 25% or greater change in any sponsored research percent effort reported on the MOU or
- Any change in the percent distribution of Total Professional Responsibility between VCU and the VA.

- After departments have worked with investigators to complete an MOU update (whether annual or mid-year change), forward to SOMRESADMIN@vcu.edu for review.
- SOM Research Administration will review, ask for any necessary updates, and then request departments obtain Investigator and Department Chair signature.
- SOM Research Administration will obtain SOM Dean signature and forward to the VAMC for their execution.
- SOM Research Administration will distribute executed MOU’s to departments.
- If a department receives an executed MOU from the VAMC, it should be forwarded to SOMRESADMIN@vcu.edu to ensure SOM has a current fully executed copy.

**Background for VCU/VAMC MOU Requirement**

A completed MOU fulfills the requirements of the National Institutes of Health as stated in the Grants Policy Statement dated October/November 2015:

“Investigators with joint appointments at a VAMC (VA hospital) and an affiliated university must have a valid MOU that specifies (at both the university and the VAMC) the title of the investigator's appointment, distribution of compensation, the responsibilities of the proposed investigator, and the percentage of effort available for research at each institution. The MOU must be signed by the appropriate officials of the recipient and the VAMC, and must be updated with each significant change of the investigator’s responsibilities or distribution of effort and, without a significant change, not less than annually. The joint VA/university appointment of the investigator constitutes 100 percent of his or her total professional responsibilities. However, NIH will recognize such a joint appointment only when a university and an affiliated VA hospital are the parties involved.

A grant application from a university may request the university’s share of an investigator’s salary in proportion to the effort devoted to the research project. The institutional base salary as contained in the individual’s university appointment determines the base for computing that request.

The signature of the AOR of the submitting university on an application to NIH that includes such an arrangement certifies that
- the individual whose salary is included in the application serves under a joint appointment documented in a formal MOU between the university and the VA, and
- there is no possibility of dual compensation for the same work or of an actual or apparent conflict of interest.