

Shaffner, James

From: Ribaldo, Cathy (NIH/OD/ORS) [E] [ribaudoc@ors.od.nih.gov]
Sent: Friday, November 06, 2009 4:24 PM
To: Shaffner, James; 'lynne@aapm.org'
Subject: FW: Question from Lynn Fairobent

2009 DEC -4 PM 1:37

FYI, if you can stand one more email from me today!

C

RECEIVED

From: Ellis, Joe (NIH/OD) [E]
Sent: Friday, November 06, 2009 4:02 PM
To: Ribaldo, Cathy (NIH/OD/ORS) [E]
Cc: Rockey, Sally (NIH/OD) [E]
Subject: RE: Question from Lynn Fairobent

74 FR 39716

8/7/09

8

There are none that I am aware of. I expect we would need to poll the ICs to see if this was a issue.

Joe

From: Ribaldo, Cathy (NIH/OD/ORS) [E]
Sent: Friday, November 06, 2009 3:13 PM
To: Ellis, Joe (NIH/OD) [E]
Cc: Rockey, Sally (NIH/OD) [E]
Subject: RE: Question from Lynn Fairobent

Joe,

Thank you so much! I will pass this info along to Lynne. I think it will go a long way to addressing her original question. In a larger context, Lynn wanted to know if there were any projects or research that had to be cancelled BECAUSE OF the issues regarding radioactive waste disposal (exorbitant cost, lack of disposal pathway, lack of available on-site secured storage, etc.). I doubt there is some master database somewhere, capturing this information, but perhaps only anecdotally might you learn of this. If you DO happen to know of any cases where research was not able to get off the ground due to waste disposal concerns, could you please let me know?

Many thanks, I appreciate your response.

Cathy

From: Ellis, Joe (NIH/OD) [E]
Sent: Thursday, November 05, 2009 9:05 AM
To: Ribaldo, Cathy (NIH/OD/ORS) [E]
Cc: Rockey, Sally (NIH/OD) [E]
Subject: FW: Question from Lynn Fairobent

Cathy,

Sally asked me to respond to the question ': Does NIH Grants Management have a policy on the % of grant money that is allowed to be used for university overhead, i.e. waste disposal costs?

The quick answer is we do have a policy and allow for reimbursement without a specific restriction.

This is a statement on hazardous waste disposal from the NIH Grants Policy Statement under selected items of cost

SUNSI Review Complete
Template = ADM-013

1

E-RIDS = ADM-03
Add: J. Shaffner (JAS11)

'Hazardous Waste Disposal – Allowable. Usually treated as an F&A cost.'

A bit more background: All NIH grant awards carry terms of award requiring grantees to comply with all applicable federal, state and local law and regulation. So clearly they are required to appropriately dispose of this waste product associated with the conduct of NIH supported research.

We also allow grantees to budget and be reimbursed for costs associated with the conduct of research, so long as it is in compliance with our terms of award and applicable Federal cost principles, (none of these requirements would preclude the reimbursement of the costs of radiological waste disposal as long as the costs is reasonable, allocable to the project we are supporting and treated consistently in the grantee's accounting for costs).

As stated in the NIH Grants Policy Statement, these costs are allowable and often recovered as part of the grantee's Facilities and Administrative (F&A) or indirect costs. However, I understand that many research institutions have policies requiring direct charging of these expenses, because they are relatively easy to associate with the activities of specific labs and so NIH supported projects in those labs.

I hope this is helpful in addressing this question. Please feel free to contact me if there is a need for any further clarification.

Joe Ellis
Director, Office for Policy on Extramural Research Administration
Office of Extramural Research
National Institutes of Health
301-435-0935

Shaffner, James

From: Ribaudo, Cathy (NIH/OD/ORS) [E] [ribaudoc@ors.od.nih.gov]
Sent: Friday, November 06, 2009 4:00 PM
To: 'lynne@aapm.org'; Shaffner, James
Subject: FW: Question from Lynn Fairbent

Another perspective (from a grantee) if it's helpful:

Thanks,
Cathy

From: Scanga, Charles A. [mailto:scangaca@pitt.edu]
Sent: Friday, November 06, 2009 1:44 PM
To: Ribaudo, Cathy (NIH/OD/ORS) [E]
Subject: Re: Question from Lynn Fairbent

Cathy,

Sorry I haven't gotten to your email until now. I have been completely tied up with a meeting that I was responsible for organizing.

Anyways, off the top of my head, I am unaware if there is any limit that NIH imposes on grant overhead. Each institution sets its own overhead. The highest overhead rate I've heard of is at Scripps...they charge 89%. So for instance, if you want to do a study and you calculate that it will cost you \$500,000 to do that study including personnel salaries, supplies, animal costs, etc, then the university will add onto that their overhead (in the case of Scripps, this would be an additional 445,000!). "Radioactive waste disposal" is provided by the university and so not included as a separate line in the grant budget. To my knowledge there is no NIH-imposed ceiling for overhead. The down-side to high overheads is that the grant reviewers may be less inclined to fund your project if it has really outrageous overhead costs.

But I can check with our Research Accountant and let you know for sure.

Best,

Chuck

On 11/4/09 11:04 AM, "Ribaudo, Cathy (NIH/OD/ORS) [E]" <ribaudoc@ors.od.nih.gov> wrote:

Hey Chuck

Can you check with the primary recipient of your NIH grant and see if there's any boilerplate language there about any \$\$ limitations on university overhead, for example waste disposal?

Hope this makes sense... This Sally has not gotten back to me yet. I nudged her again today but still, you might be able to give me an answer from the grantee perspective.

Thanks!

C