Harvard Pilgrim Health Care, Inc.
Harvard Pilgrim Health Care Institute, LLC
Office of Sponsored Programs

Policy and Procedure

TITLE: Application Submissions for Faculty with Dual Appointments

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PURPOSE:
To describe the process for faculty with dual appointments to submit applications for research funding and research proposals for institutional review board (IRB) review.

PERSONS AFFECTED:
This policy & procedure (P/P) applies to all Harvard Pilgrim Health Care, Inc. (HPHC) and Harvard Pilgrim Care Institute, LLC (HPHCI) (collectively, HPHC/I) personnel engaged in research, teaching or research administration activities in support of the charitable and educational mission of HPHC, Inc.

DEFINITIONS:
Dual Appointments (for purposes of this policy) - those HPHC/I employees who have Harvard Medical School faculty appointments and clinical or faculty appointments at an organization outside HPHC/I.

Institutional Review Board (IRB) (for purposes of this policy) –is an administrative body established to protect the rights and welfare of human research subjects recruited to participate in research activities conducted under the auspices of the institution with which it is affiliated.

Prime Institution (for purposes of this policy) – is the pay master of the faculty/investigator.

POLICY:
It is the policy that faculty who conduct research ("Faculty/Investigator") at HPHC/I and whose primary or only appointment is with Department of Population Medicine (DPM) shall submit applications for research funding through HPHC as the prime grantee and shall submit research proposals to the HPHC IRB. Faculty who have joint or dual appoints may submit applications through their secondary institution under certain circumstances.

PROCEDURE:

1. Determination of grantee institution

The DPM Chair, in consultation with the HPHCI Administrative Director and the Director of the Office of Sponsored Programs (OSP), shall determine to which grantee institution Faculty/Investigators shall submit their funding application based on the following considerations:

1. The Faculty/Investigator's prime institution;
2. The institution most appropriate for the proposed research;
3. HPHC resources be used (primary grantee or subrecipient grantee); and
4. Amount of full indirect costs allowed at each institution.

2. Determination of IRB

Research projects submitted through HPHC either as the prime grantee or a subrecipient must also be submitted to the HPHC IRB regardless of the Faculty/Investigator's prime appointment. A subaward to the Faculty/Investigator's prime institution may be required and the Faculty/Investigator should always consult with their prime institution's human research protection program to ensure compliance with institutional requirements.

The HPHC IRB shall provide review and approval of all proposed research activities before any HPHC/I personnel can engage in human subjects research. Faculty/Investigators whose prime institution is not HPHC are not required to submit research protocols to the HPHC IRB unless it is determined that HPHC is engaged in the research.

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REVISION HISTORY:

Department: OSP (Grants Management and Research Compliance)	**Title**: Policy and Procedure: **Application Submissions for Faculty with Dual Appointments**
Effective Date: March 6, 2019; May 1, 2020	**Owner:** Director, Office of Sponsored Programs
Replaces P/P Dated: March 6, 2019	
Related Documents: Policy and Procedures: Human Research Protection Program Oversight; Investigator Qualifications.	
References:	