

Policy for Jointly Appointed University and Department of Veterans Affairs Personnel on National Institutes of Health Proposals

Policy Overview

The National Institutes of Health (NIH) requires that investigators with joint University and Department of Veterans Affairs (VA) appointments maintain a formal Memorandum of Understanding (MoU). The MoU outlines the duties and effort to be committed by the personnel jointly appointed at both the University and the Department of Veterans Affairs. In addition, the MoU certifies that “there is no possibility of dual compensation for the same work, or of an actual or apparent conflict of interest regarding such work.”

Memorandum of Understanding (MOU)

The Memorandum of Understanding (MoU) for investigators with joint University and Department of Veterans Affairs (VA) appointments must include the following information:

- Appointment titles (for both institutions) of the jointly appointed investigator
- Responsibilities (for both institutions) of the jointly appointed investigator
- Percentage of effort available for research by the jointly appointed investigator

The MoU must be signed by the University (Principal Investigator, Department Head and/or College Dean) and the VA.

The MoU must be updated with each significant change of the investigator's responsibilities or distribution of effort and, without significant change, not less than annually.

Policy Responsibilities

It is the responsibility of the Principal Investigator, Department Head and/or College Dean to draft, execute, maintain, and update the Memorandum of Understanding (MoU). In addition:

- Upon request from the National Institutes of Health (NIH) or Sponsored Projects Services (SPS), immediately provide a fully-executed copy of the most recent MoU.
- The committed effort (FTE) and appointment title listed for the investigator's University entry on the MoU must match the investigator's information provided in UACCESS.

Helpful reminders

- SPS **does not** draft, execute, maintain, or update Memorandum of Understanding (MoU) documents.
- If it is not possible for a department or college to jointly hire a Veterans Affairs (VA) employee at the University, and if the VA employee will be serving in a role other than PI on a proposal, then it may be possible to pay the VA employee via the Intergovernmental Personnel Act (IPA) as long as the IPA assignment will not exceed four years in length and as long as the IPA assignment is limited in scope. It is the responsibility of the PI, department and/or college to confirm with the

VA whether this method of payment is allowable under the VA employee's current job classification.

- If a VA employee has a MoU on-file with another non-Federal institution, it may be possible to issue a subaward to the other non-Federal institution if the VA employee has available research time at the other non-Federal institution. It is the responsibility of the PI, department and/or college to confirm with the other non-Federal institution if research time is available, as well as to request and maintain a copy of the MoU between the VA and the other non-Federal institution.

Resources:

- [Memorandum of Understanding \(MoU\) template for jointly appointed University of Arizona and SAVAHCS employees](#)
- [NIH Grants Policy Statement \(Part II, Subpart B: Grants to Federal Institutions and Payments: VA-University Affiliations\)](#)
- [NIH Grants Policy Statement \(Part II, Subpart B: Grants to Federal Institutions and Payments: Allowable and Unallowable Costs: Salary or Fringe Benefits\)](#)