

**BIOMEDICAL RESEARCH INSTITUTE OF
NEW MEXICO**

POLICY GUIDELINES

2017

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BOARD OF DIRECTORS

Please contact the Biomedical Research Institute of New Mexico's (BRINM) Administrative Office or visit www.brinm.org for the list of BRINM's Board of Directors.

MISSION STATEMENT

Biomedical Research Institute of New Mexico's (BRINM's) mission is to facilitate high-quality scientific research and education in order to improve the healthcare and quality of life for our nation's veterans and, ultimately, humankind.

GUIDING PRINCIPLE

BRINM supports Department of Veterans' Affairs (VA) investigators in making successful advances in medical diagnosis and treatment by providing quality services in research and education.

CORE VALUES

BRINM has defined 14 core values supporting its commitment to ethical practices; BRINM's Core Values are to:

- Ensure patient safety and health above all else
- Protect the confidentiality of all sensitive information whatever the source (PHI, VA, customer or study proprietary, etc.)
- Ingrain integrity into our business and personnel practices
- Commit to the VA Ethics Policy and practices
- Prevent any existing or potential conflicts of interest from occurring
- Focus on our customer's requirements and challenges
- Maintain a safe and secure work environment
- Empower our employees and contractors
- Implement internal and external quality processes
- Maintain open and transparent communications with all stakeholders
- Maintain positive attitudes
- Provide professional and personal opportunities
- Promote safety and security awareness

GOALS

- To be the institution of choice for administration of research and education funding
- To foster collaboration that will further the BRINM mission

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- To create a rewarding and challenging environment in which to conduct research
- To educate the public about VA research

THE BIOMEDICAL RESEARCH INSTITUTE OF NEW MEXICO

BRINM is a public nonprofit organization under the Internal Revenue Code 501(c)(3). It is one of more than 89 similar nonprofit organizations associated with VA medical centers nationwide. Passed in 1988, Public Law 100-322, Section 204 authorizes the establishment at any Department of Veterans Affairs medical centers of a nonprofit corporation to provide a flexible mechanism for the receipt and administration of research/education funds other than VA appropriations. The purpose of BRINM is to advance the research/education mission of the Department of Veterans Affairs through the support of research/education-related activities at the New Mexico VA Healthcare System (NMVAHCS).

Sources of funding may be grants, contracts, gifts from for-profit companies, charitable foundations, the National Institutes of Health and other federal agencies, professional societies, other nonprofit entities, and individuals. Because the only statutory purpose of BRINM is to facilitate VA research/education, all funds received must be administered for purposes relating to VA approved research or to further VA approved education.

The statutory members of the BRINM Board of Directors are the medical center's Director, Chief of Staff (COS), the Associate Chief of Staff for Research (ACOS/R) and the Associate Chief for Education (ACOS/E).

Generally non-statutory members of the Board are drawn from people with backgrounds in Veterans' affairs, military experience, legal, financial, and medical or scientific expertise of benefit to BRINM.

BRINM is located on the NMVAHS Albuquerque campus in Building 14. If you have any questions or would like additional information about BRINM, please call 505-260-1033.

GENERAL POLICY STATEMENT

These policies are intended to serve as guidelines. No policy guidelines can anticipate every circumstance or question that may arise. As BRINM continues to grow, the need may arise to change policies described in these guidelines. Therefore, BRINM reserves the right to revise, supplement, or rescind any policy or portion of the guidelines from time to time as it deems appropriate, in its sole and absolute discretion. Principal investigators (PI) and BRINM employees, if applicable, will be notified of such changes as they occur. The programs and operations of BRINM are subject to the scrutiny and review of the VA Inspector General (IG).

No policy of BRINM shall be knowingly carried out if it conflicts with Federal, State or Local authority or to the common ethical principles of academic medicine, research, or education. In keeping with this, no activities of BRINM shall involve monies, income or any direct personal benefit to BRINM directors and employees.

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All checks must be made payable to the Biomedical Research Institute of New Mexico (or BRINM). Funds received in support of a particular activity can be accepted only if the principal investigator (PI) holds an appointment at the NMVAHCS and only if the NMVAHCS Research Committee has approved the project. A letter, memorandum or contract stating whether the funds are for restricted or unrestricted research, continuing research and/or education, must accompany all checks.

It is important to contact the BRINM administrative office as soon as possible once a decision has been made to apply for a (non-VA) peer reviewed grant or enter into a clinical trial. This will help avoid unnecessary delays. In the case of grant submissions, there are often many forms to be completed, some of which require signatures from BRINM and/or VA officials that are not always easy to obtain. The BRINM administrative office has the necessary application information, forms, etc. to assist the PI with a grant submission. **Under no circumstances can a PI sign on behalf of BRINM or VA.** For more information regarding grant proposals or clinical trials, please contact the BRINM administrative office.

An administrative fee is charged on all funds deposited into BRINM. These funds are used for administrative expenses such as salaries, legal and accounting fees, office expenses, insurance and other necessary operational expenses. Exceptions to the administrative fees are made when donations are received from Veterans' Service Organizations or private individuals contributing less than \$2,000.

GOVERNANCE POLICIES

BRINM has established the following governance policies authorized by the Board of Directors:

- BRINM-POL-001, BoD and Committee Rules for Meetings
- BRINM-POL-002, Electronic Meetings, Communications, and Voting
- BRINM-POL-003, Consent Agendas
- BRINM-POL-004, Conflicts of Interest
- BRINM-POL-005, Code of Ethical Conduct
- BRINM-POL-007, Financial Oversight

In addition to the policy documents, BRINM has established and approved the following categories of documents to manage and control their operations:

Interface Control Documents (ICDs) – ICDs document the processes BRINM has established to ensure consistent instructions for all program personnel, including principal investigators (PIs) and contract personnel, needed to meet BRINM's mission, operations, and regulatory requirements. ICDs may also address external VA organizations such as medical center services.

Standard Operating Procedures (SOPs) – SOPs document the processes BRINM has established to ensure consistent application of operational policy within BRINM. The SOPs describe the overall process to be followed in implementing the policy and generally answer “who”, “what”, “where”, and “when.”

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Work Instructions (WIs) – WIs usually provide step-by-step descriptive detail and answer “how”. Where the process does not require detailed work instructions, the “how” may be incorporated into the applicable SOP. WIs may describe a task or a process related instruction.

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CONFLICTS OF INTEREST

1. Application of Policy

BRINM's Conflict of Interest Policy applies to all BRINM employees, not covered by BRINM-POL-004, Conflicts of Interest. This Policy aims at preventing conflicts of interest, and for managing a conflict when it exists. This Policy has been designed to ensure appropriate transparency and compliance with appropriate legal and regulatory requirements established for nonprofit corporations (NPCs), such as BRINM.

- a. This Policy is intended to *supplement, but not replace*, federal and state laws governing conflicts of interest applicable to VA-affiliated nonprofit research and education corporations such as BRINM. Section 7366(c)(1), Title 38 U.S.C., provides, as to conflicts of interest:

Each member of the board of directors of a corporation established under this subchapter, each employee of such a corporation, and each employee of the Department who is involved in the functions of the corporation during any year shall be subject to federal laws and regulations applicable to Federal employees with respect to conflicts of interest in the performance of official functions.

- b. This Policy is subordinate to the BRINM Board of Director's Policy on Conflict of Interest to the extent that each policy (the Board's and this employee COI policy) may cover the same employees. Where both policies can be applied in a conflict of interest situation, the Board's Policy will be used.
- c. Interested Party. Persons covered under this policy, as well as their relatives and business, personal, and professional associates, are hereinafter referred to as an interested party or parties.

2. Conflict of Interest

Definition. A conflict of interest may exist when the interests or concerns of an interested party may be seen as competing with the interests or concerns of BRINM. More specifically, a real or actual conflict of interest denotes a situation in which a BRINM employee has knowledge of a private economic or other interest that is sufficient to influence the exercise of his or her duties and responsibilities owed to BRINM.

A potential conflict of interest arises when individuals can foresee that a private interest may someday be sufficient to influence the exercise of their duty, but has not yet.

An apparent conflict of interest exists when there is a reasonable apprehension, which reasonably well-informed persons could properly have, that a conflict of

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interest exists.

All three situations are included in the terms or words “conflict of interests” or “conflicts” as used in this Policy.

Examples. There are a variety of situations that raise conflict of interest concerns including, but not limited to, the following:

- a. **Financial Interests** - A conflict may exist where an interested party directly or indirectly benefits or profits as a result of a decision, policy or transaction made by BRINM. Examples include situations where:
 - BRINM contracts to purchase or lease goods, services, or properties from an interested party
 - BRINM offers employment or compensation to an interested party
 - An interested party is provided with a gift, gratuity, or favor of a substantial nature from a person or entity that does business or seeks to do business with BRINM
 - An interested party is gratuitously provided use of the facilities, property, or services of BRINM
 - BRINM adopts a policy that financially benefits an interested party
- b. **Use of Information** – Interested persons shall not use information received from participation in BRINM affairs, whether expressly denominated as confidential or not, for personal gain or to the detriment of BRINM.
- c. **Other Interests** - A conflict also may exist where an interested party obtains a non-financial benefit or advantage that he/she would not have obtained absent his/her relationship with BRINM. Examples include where:
 - An interested party seeks to obtain preferential treatment by BRINM or recognition for himself/herself or another interested party
 - An interested party seeks to make use of confidential information obtained from BRINM for his/her own benefit (not necessarily financial) or for the benefit of another interested party
 - An interested party seeks to take advantage of an opportunity or enables another interested person or other organization to take advantage of an opportunity that he/she has reason to believe would be of interest to BRINM
 - BRINM adopts a policy that provides a significant nonfinancial benefit to an interested party
 - Hiring subordinates with a financial, social, familial, or personal relationship

3. Disclosure of Conflicts of Interest

An interested party is under a continuing obligation to disclose any conflict of

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interest as soon as it is known or reasonably should be known.

An interested party shall complete the Disclosure Questionnaire attached as Appendix A to fully and completely disclose the material facts about any potential, actual, or apparent conflicts of interests. The disclosure statement and Affirmation of Compliance (Appendix B) shall be submitted upon his/her association with BRINM, and shall be reviewed annually thereafter. An additional disclosure statement shall be filed whenever a conflict subsequently arises.

Disclosure statements will be submitted to the Executive Director or designee.

4. Review of Conflicts

The Executive Director or designee shall be responsible for reviewing the disclosed matter and may take appropriate action as necessary to protect the interests of BRINM. The Executive Director shall report to the Chair of the Board of Directors of BRINM (the Chair) the results of any review and the action taken. The Chair shall determine whether any further board review or action is required.

5. Procedures for Addressing Conflicts of Interest

Where a conflict exists between the interests of BRINM and an interested party with respect to a specific proposed action, policy or transaction, BRINM shall refrain from acting until such time as the proposed action, policy or transaction has been approved by the Executive Director. The following procedures shall apply:

1. An interested party who has a conflict of interest with respect to a proposed action, policy or transaction of BRINM shall not participate in any way in, or be present during, the deliberations and decision-making of BRINM with respect to such action, policy or transaction. However, the interested party shall have an opportunity to provide factual information about the proposed conflict and/or action, policy or transaction. Also, the Executive Director or designee may request that the interested party be available to answer questions.
2. The Executive Director may approve the proposed action, policy or transaction upon finding that it is in the best interests of BRINM. The Executive Director shall consider whether the terms of the proposed action, transaction or policy are fair and reasonable to BRINM and whether it would be possible, with reasonable effort, to find a more advantageous arrangement with a party or entity that is not an interested party.

6. Documentation

The review documents shall include:

- a. The names of the persons who disclosed or otherwise were found to have a financial or other interest in connection with a conflict of interest, the nature of the financial or other interest, any action taken to determine whether a conflict was present, and the Executive Director's or

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designee's decision, where prudent, as to whether a conflict of interest in fact existed.

- b. The names of the persons who were present for discussion, the content of the discussion, and any alternatives to the proposed transaction or arrangement. Whenever possible, the documentation should frame the decision in such a way that it provides guidance for consideration of future conflict of interest situations.

7. Violations of Conflict of Interest Policy

If the Executive Director has reason to believe that an interested party has failed to disclose a conflict of interest, it shall inform the person of the basis for such belief and allow the person an opportunity to explain the alleged failure to disclose.

If the Executive Director or designee decides that the interested party has in fact failed to disclose a possible conflict of interest, the Executive Director shall take appropriate disciplinary and corrective action.

8. Training

All new employees, volunteers, or those otherwise affiliated with BRINM shall receive conflict of interest training within 90 days of their being hired by BRINM or volunteering or otherwise becoming affiliated with BRINM.

Annual conflict of interest training will be given to employees, volunteers and affiliates.

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Appendix A

Biomedical Research Institute of New Mexico (BRINM)

Conflict of Interest

Disclosure Questionnaire

Please complete the questionnaire below, indicating any potential conflicts of interest. If you answer "yes" to any of the questions, please provide a written description of the details of the specific action, policy or transaction in the space allowed. Attach additional sheets as needed.

Financial Interests - A conflict may exist where an interested party, directly or indirectly benefits or profits as a result of a decision, policy or transaction made by BRINM.

During the past 12 months (for each "yes" response, please describe on a separate page.):

| | | | |
|----|---|--|-----------|
| 1. | Has BRINM proposed to contract or contracted to purchase or lease goods, services, or property from you or from any of your relatives or associates? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 2. | Has BRINM offered employment to you (not applicable to existing staff) or to any of your relatives or associates? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 3. | Have you, or any of your relatives or associates, been provided with a gift, gratuity or favor of a substantial nature from a person or entity that does business or seeks to do business with BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 4. | Have you or any of your relatives or associates been gratuitously provided use of the facilities, property, or services of BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 5. | Have you, a relative or an associate been in a position to benefit financially from an action, policy or transaction made by BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |

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Other Interests - A conflict may also exist where an interested party obtains a non-financial benefit or advantage that they would not have obtained absent their relationship with BRINM, or where their duty or responsibility owed to BRINM conflicts with a duty or responsibility owed to some other organization.

At any time during the past twelve months (for each "yes" response, please describe on a separate page.):

| | | | |
|----|--|--|-----------|
| 1. | Did you obtain preferential treatment, promotion, recognition or a non-salaried appointment for yourself or for any of your relatives or associates as a consequence of your association with BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 2. | Did you make use of confidential information obtained from BRINM for your own benefit or for the benefit of a relative, associate, or other organization? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 3. | Did you take advantage of an opportunity or enable a relative, associate or other organization to take advantage of an opportunity that you had reason to believe would be of interest to BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |
| 4. | Have you, a relative, an associate, or a social acquaintance been in a position to benefit in a nonfinancial way from an action, policy or transaction made by BRINM? | <input type="checkbox"/> <input type="checkbox"/> | Yes No |

Name _____

Signature _____ Date _____

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Appendix B

Biomedical Research Institute of New Mexico (BRINM)

Conflict of Interest

Affirmation of Compliance

I have received and carefully read the Conflict of Interest Policy for BRINM employees and have considered not only the literal expression of the policy, but also its intent. By signing this affirmation of compliance, I hereby affirm that I understand and agree to comply with the Conflict of Interest Policy. I further understand that BRINM is a nonprofit organization and that in order to maintain its federal tax exemption, it must engage primarily in activities that accomplish one or more of its tax-exempt purposes without personal inurement (other than by salary) by staff.

Except as otherwise indicated in the Disclosure Questionnaire and attachments, I hereby state that I do not have any conflict of interest, financial or otherwise that may be seen as competing with the interests of BRINM, nor does any relative or associate have such a potential conflict of interest. Nor shall I, any relative or associate benefit from any action, policy or transaction made by BRINM in a manner that has not been previously disclosed.

If any situation should arise in the future that I think may involve me in a conflict of interest, I will promptly and fully disclose in writing the circumstances to the Executive Director.

I further certify that the information set forth in the Disclosure Questionnaire and attachments, if any, is true and correct to the best of my knowledge, information and belief.

Name (Please print)

Signature _____

Date _____

Annual Review and Reaffirmation

Signature _____

Date _____

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Whistle-Blower Protection

BRINM encourages its employees to report suspected or actual illegal or improper activity, financial or otherwise. BRINM will not condone any activity that is illegal or improper, whether done by a Board Member or employee. BRINM has enacted a policy for the protection of whistle blowers as follows:

1. **Anonymous reporting.** All employees are encouraged to report to the appropriate level of management on any activity that an employee reasonably believes to constitute fraudulent activity or is in violation of any governmental regulation. All employees have the assurance that these reports will be considered completely confidential, and the identity of the reporting employee will not be disclosed.
2. **Retaliation prohibited.** BRINM does not tolerate retaliation in any form, including harassment or discrimination, against any employee who reasonably has raised concerns about possible fraudulent activity. This also includes any activity that is in violation of Government regulations. Any reports of retaliation will be thoroughly investigated, and any offending employees will be dealt with accordingly.
3. **Training.** In addition to written documentation in the employee handbook, BRINM mandates training to educate all employees as to what may constitute fraudulent activity and appropriate action to take if fraudulent activity is suspected.

Report to the Executive Director or Chairman of the Board any activities that you believe to be illegal or improper. Employees will be protected against retaliatory actions resulting from reporting unethical conduct. Any employee who feels that adverse action has been taken toward him/her due to a report of improper activity should notify the Executive Director or the Chairman as soon as possible.

DOCUMENT RETENTION AND DESTRUCTION

BRINM shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements. Records and documents outlined in this policy includes paper, electronic files (including e-mail) and voicemail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities.

In accordance with 18 U.S.C. Section 1519 (destruction, alteration, or falsification of records in Federal investigations and bankruptcy) and the Sarbanes-Oxley Act of 2002, BRINM shall not knowingly destroy a document with the intent to obstruct or influence an "investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States ... or in relation to or contemplation of such matter or case." If an official investigation is underway or even suspected, document purging must stop in order to avoid criminal obstruction.

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Record Retention Schedule

The following table provides sample minimum requirements (retention times are based on calendar years):

| Type of Document | Minimum Best Practice Requirement |
|---|--|
| Accounts receivable & payable ledgers & schedules | 7 years |
| Articles of Incorporation, charter, bylaws, minutes and other incorporation records | Permanently |
| Audit reports, Financial Statements (yearend): general/private ledgers, trial balance, journals | Permanently |
| Bank Reconciliation | 3 years |
| Bank statements, deposit records, electronic fund transfer documents, & cancelled checks | 3 years |
| Chart of accounts | Permanently |
| Checks (for important payments & purchases) | Permanently |
| Contracts, mortgages, notes and leases (expired) | 7 years |
| Contracts (still in effect) | Permanently |
| Correspondence (general) | 3 years |
| Correspondence (legal and important matters) | Permanently |
| Correspondence (with customers and vendors) | 2 years |
| Deeds, mortgages, and bills of sale | Permanently |
| Depreciation schedules | Permanently |
| Donations | 7 years |
| EEOC reports | Permanently |
| Employee demographic info & compensation records* (Davis-Bacon Act, Service Contract Act & Walsh-Healy Public Contracts Act) | 3 years |
| Employment applications* (depending on the # of employees, employers must retain applications & other personnel records relating to hires, rehires, tests, promotions, transfers, demotions, selection for training, layoff, recall, termination or discharge) (Civil Rights Act of 1964, Title VII, ADA, ADEA) | Current year + 1 year from making the record |

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| Type of Document | Minimum Best Practice Requirement |
|--|--|
| Expense Analyses/expense distribution schedules | 7 years |
| Garnishments | 7 years |
| Grants (un-funded) | 1 year |
| Grants (funded) | 7 years after closure |
| I-9's* | 3 years after date of hire or 1 year after termination |
| Insurance Policies (expired) | 3 years |
| Insurance records, current accident reports, claims, policies, etc. | Permanently |
| Internal audit reports | 3 years |
| Invoices (to customers, from vendors) | 7 years |
| Inventory records | 7 years |
| Loan documents and notes | Permanently |
| OSHA logs* (Records related to medical exams – 30 years after termination) | 5 years |
| Payroll records & summaries including records related to employee's leave* (Equal Pay Act, FLSA) | 7 years |
| Personnel files (terminated employees) (Title VII, ADA, ADEA) | 7 years after termination |
| Purchase orders | 7 years |
| Retirement and pension records including Summary Plan Descriptions* (ERISA) | Permanently |
| Tax returns and worksheets | Permanently |
| Timesheets | 7 years |
| Withholding tax statements* (FICA, FUTA, Federal Income) | 7 years |
| Workers compensation documentation | 10 years after 1 st closure |

EMPLOYMENT POLICIES – GENERAL

BRINM may employ full- and part-time employees to carry out its research and educational mission. Employment with BRINM is on an at-will basis. This means that the employment relationship can be terminated at any time by either the employee or the employer for any reason not prohibited by law. Employment decisions shall be based upon the recommendation of the PI, with final approval by the BRINM human resources administrator.

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Equal Opportunity Employer

BRINM is an equal opportunity employer. Our policy is clearly and simply stated as follows:

It is the policy of this organization to offer equal opportunity to all qualified employees and applicants for employment without regard to race, religion, color, sex, national origin, age, sexual orientation, gender identity, disability, or veteran status ("protected class status"). BRINM also complies with applicable state and local laws governing nondiscrimination in employment. We will take positive action to ensure fulfillment of this policy in all areas, including hiring, placement, promotion, transfer or demotion, recruitment, employment ads, wage rates or other forms of compensation, and selection for training, layoff, or termination. All such decisions are based on individual merit, qualification and competence, and on promotion of the principle of equal employment opportunity.

This policy is part of BRINM's commitment to comply with the requirements and objectives set forth by presidential Executive Order 11246, Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, the Americans with Disabilities Act of 1990, the Uniformed Services Employment and Reemployment Rights Act, the Vietnam-Era Veterans Readjustment Assistance Act of 1974, the Rehabilitation Act of 1973 and any applicable federal, state and local laws, as amended.

BRINM's policies and objectives regarding equal employment opportunity and affirmative action programs will be regularly reviewed to determine the progress toward our stated goals.

Non-citizens of the United States are eligible for employment only under certain alien status. Please contact the human resources administrator for more information.

An Employment Request Memorandum (See BRINM website at www.brinm.org for all forms referenced in the Policy Guidelines) listing the duties, responsibilities, qualifications, estimated start date and proposed salary of the position shall be submitted to the BRINM human resources administrator when a PI wishes to hire an employee with BRINM funds. The executive director and the human resources administrator must approve this request. The job opening will be posted at the BRINM office, the Cooperative Studies Program Clinical Research Pharmacy Coordinating Center (CSPCRPCC) and any other requested location for a minimum of five business days. The posting requirement is not necessary when hiring for a position that requires less than twenty (20) hours of work per week. Arrangements for a classified advertisement in the Albuquerque Journal (or other newspaper/website of general circulation) can be made through the BRINM administrative office. BRINM will collect original resumes and forward copies to the hiring PI. As BRINM receives resumes, the applicants' names will be recorded on an applicant flow record. Once the selection has been made, the human resources administrator will hire the applicant(s). Upon selection of an applicant, the PI must provide applicant flow information to the human resources administrator. No PI should contact a candidate independently.

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Nepotism

Careful consideration is to be given to the hiring and placement of persons closely related (i.e. immediate family) to an existing employee to avoid either actual or potential conflicts of interest or preferential treatment. For the purpose of this policy, “immediate family” is defined as:

- Spouse/Life Partner
- Spouse/Life Partner’s Parents
- Parents
- Grandparents
- Children
- Children’s Spouse/Life Partner
- Grandchildren
- Sister/Brother (and any spouse/life partners)
- Any individual who reside with the employee as a member of his/her family

The above relationships include any commonly and legally recognized family relationships such as step-, half-, and foster-parents, children, siblings, etc.

An applicant who is closely related to a current employee is not eligible for employment in a position that would result in one family member directly reporting to or reviewing the performance of another.

Individuals may not be placed, as the result of a change in employment status (i.e. transfer, promotion, etc.) into a department or situation where an immediate family relationship affects, or appears to affect, their or other employees’ impartiality, judgment, or effectiveness in the performance of BRINM business. For example, closely-related individuals may not supervise each other or audit the work of an immediate family member.

If, while working at BRINM, employees become closely related as defined above, they may continue employment as long as no supervisory relationship is established. Should a conflict occur, BRINM will attempt to find a suitable position to which one of the affected employees may transfer. If a suitable position is not available, the employees involved may determine which of them shall remain. The conflict situation must be resolved within six months from the date a change in immediate family status occurs.

Closely related employees, or employees who become closely related, must immediately inform their Principal Investigator or supervisor of their relationship. Questions about whether a relationship is covered by this policy are to be directed to the BRINM Human Resources Administrator.

Sufficient Funding Requirement

Hiring research/educational staff is discouraged unless the PI has sufficient funds to cover at least six months of employment related expenses. These expenses include salary, applicable benefits (see Benefits section), employer’s share of payroll taxes,

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unemployment insurance and workers compensation. Deductions from each project account for these expenses will be made as incurred.

BRINM's Responsibilities Concerning New Employees

It is BRINM's responsibility to arrange a Without Compensation (WOC) appointment for new employees through the VA research office with sufficient time for the paperwork to be processed before the individual is to begin working. All newly hired employees must have an orientation with the BRINM human resources administrator before the timesheet collection for the first pay period that he/she works. The new employee will complete necessary administrative paperwork and receive an employee handbook.

Intergovernmental Personnel Act (IPA)

The Intergovernmental Personnel Act (IPA) mobility program is intended to facilitate cooperation between federal and state agencies and both nonprofit and for profit private sector organizations through temporary assignments of skilled personnel. IPA assignments may not be used to circumvent personnel ceilings for federal hiring practices nor may they be used to meet the personal interests of employees or to avoid unpleasant personnel decisions.

The Biomedical Research Institute of New Mexico (BRINM) is certified as eligible to participate in the IPA mobility assignment program.

BRINM has a policy not to exceed two (2) IPA assignments per investigator. Any request for an IPA by an investigator over two (2) will require Board approval. The employee who is assigned to an IPA must have been employed by BRINM for no less than ninety (90) days. The IPA will be carried for two (2) years with one (1) opportunity to extend one (1) time for an additional two (2) years. All directives, procedures and policies concerning IPA that have been established by the NMVAHCS and the US Office of Personnel Management must be adhered to.

To initiate an IPA, a memo must be sent to both BRINM and the Research Office. The memo to BRINM must state that an IPA is requested, the individual's name, the start date and the duration of the requested IPA. The memo to the Research Office is a standard form. Please request the sample memo from either BRINM or the Research Office. The approval process for an IPA may take up to six (6) weeks.

Non-Exempt Employee Time Keeping

All non-exempt employees are paid on the basis of hours worked and they complete a biweekly timesheet for each pay period. When operating requirements or other needs cannot be met during regular working hours, employees will be given the opportunity for overtime work assignments. All overtime work must receive the supervisor's prior authorization. Overtime assignments will be distributed as equitably as possible to all employees qualified to perform the required work. Overtime compensation is paid to

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non-exempt employees at one and one-half times straight rate for all hours worked over 40 in a week and in accordance with federal and state laws.

As required by law, overtime pay is based on actual hours worked. Time off or any leave of absence will not be considered hours worked for purposes of performing overtime calculations. Employees who work overtime without receiving prior authorization from the supervisor may be subject to disciplinary action including termination.

When a non-exempt employee travels to a special assignment in another city, the time spent traveling in excess of normal commuting time is counted as hours worked. Travel delays caused by outside factors, such as bad weather, need not be counted as working time.

Exempt Employees

Exempt employees will be compensated at a set salary rate. An employee who is classified as "exempt" will complete a leave sheet for each biweekly pay period. Exempt employees cannot earn overtime.

Pay Periods

Employees of BRINM will be paid on a biweekly basis. Each pay period will consist of fourteen days. Direct deposit will be issued on the Friday following the end of the pay period. BRINM currently uses an outside company for its payroll processing. It is the employee's responsibility to ensure that accurate time/leave sheets are provided to the PI or direct supervisor with enough time to be processed. It is the PI's or direct supervisor's responsibility to review, approve, and sign the employee's time/leave sheet. Time/leave sheets are due in the BRINM administrative office by no later than 12:00 p.m. on the Monday following the end of the pay period unless a holiday requires a schedule adjustment, in which case employees will be notified in advance.

Periodic Pay Increases

Employees are eligible for a 3% increase of base salary after each year of service or last pay increase based upon the recommendation of the employee's direct supervisor. An annual formal written performance evaluation is required by BRINM to support a pay increase. Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. BRINM will send the performance appraisal forms prior to the anniversary date of the employee.

BRINM will provide yearly cost of living adjustments (COLA) based on the U.S. Department of Labor, Bureau of Labor Statistics' Urban Consumer Price Index (CPI-U) to all employees or the Federal pay increase provided by the Office of Personnel Management (OPM) if the increase is greater than the CPI. The PI will be given a choice of which rate adjustment will be applied to their project(s).

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Inclement Weather

Employees are expected to make an effort to get to work during periods of inclement weather, but it is not the intention of BRINM to require employees to take risks which may endanger their safety. It is BRINM's policy that BRINM personnel assigned to VA research projects must check in with their supervisors concerning inclement weather. The BRINM administrative office will follow Kirtland's Air Force Base in delays/closures due to inclement weather. This information is provided through the public broadcast system (television, radio, internet, etc.). Employees at non-NMVAHCS sites should check with their supervisor or call BRINM for guidance when a weather emergency occurs. If the BRINM office is closed due to inclement weather, employees should not report to work and will be paid their normal pay for the day. If the office is open, employees should report to work. If the employee cannot report to work, he/she should notify his/her supervisor immediately and must use vacation time.

BENEFITS

The following benefit programs are available to eligible employees:

- Health Insurance
- Dental Insurance
- Life Insurance
- Paid Holidays
- Paid Vacation and Sick Leave
- Flexible Spending Account
- Retirement Program
- Family Medical Leave (FMLA)
- Unpaid Leave of Absence
- Employee Assistance Program (EAP)

Details of the BRINM employee benefits plan are provided in the BRINM Employee Handbook.

NO HARASSMENT POLICY

Biomedical Research Institute of New Mexico (BRINM) *absolutely prohibits* in the workplace any form of sexual harassment or other form of harassment based on race, national origin, ethnic status, gender, age, religion or disability.

BRINM is committed to maintaining a pleasant workplace environment for all employees, which is free from harassment of any kind, including sexual harassment. The core guiding principles of our Company, by committing all employees to "treat all with dignity and respect" and to be "professional in everything we do," set the standard of workplace behavior. Although this policy focuses primarily on sexual harassment, it applies equally to all forms of harassment and the procedures and guidelines within this policy apply to all kinds of harassment. Consequences for violations of this policy

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include immediate termination of employment.

All Harassment Is Prohibited

Harassment is not limited to only sexual harassment. Harassment at work may include other categories, such as race, color, national origin, religion, age, sexual identity, and disabilities. It may also include retaliation against an employee who has made a charge of discrimination, or testified, assisted or participated in an investigation or inquiry into alleged misconduct. These and related forms of aggressive acts that deprive a reasonable employee of the right to work in an environment free from discriminatory intimidation, ridicule, insult or violence will not be tolerated. Appropriate measures shall be taken to correct such conduct, up to and including termination of employment.

Sexual Harassment

Sexual harassment is a violation of the laws of the State of New Mexico as well as a violation of Title VII of the Federal Civil Rights Act of 1965. The Federal Equal Employment Opportunity Commission (EEOC) defines sexual harassment as:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either implicitly or explicitly a term or condition of employment;
- Submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment.

Many forms of offensive behavior constitute sexual harassment. Examples of this type of behavior include, but are not limited to, the following:

1. **Unwelcome, unwanted or harmful Physical actions** such as: Hugging, kissing, massaging, touching, pinching, physical assault, impeding or blocking movements intentionally, and hostile physical interference with normal work.
2. **Unwelcome, unwanted or harmful Verbal actions** such as: Using foul languages and slurs; commenting about another person's physical appearance; telling sexual jokes or stories, commenting about anyone's sexual activities, fantasies or history; indirect or direct requests for sexual activity; whistling or other inappropriate noises; instigating gossip and rumors about another person's sex life, and unwelcome and repeated requests for dates.
3. **Unwelcome, unwanted or harmful Non-Verbal actions** such as: Making sexually oriented gestures with facial or mouth expressions, leering, suggestive body language; displaying in the workplace sexually oriented pictures, cartoons, objects, and calendars; suggestive, obscene or

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inappropriate written communication of any kind.

Any conduct, whether physical, verbal, non-verbal or visual that is of a sexual nature, which is unwelcome, unwanted or harmful is sexual harassment and it will not be tolerated by BRINM in the workplace or any Company-sponsored event. Any employee violating this harassment policy, whether the harassment is sexual or of another form, will be subject to disciplinary action, up to and including discharge.

NON-DISCIPLINARY GRIEVANCE

A non-disciplinary grievance is any problem of an employee or a group of employees resulting from work requirements under which work is performed.

Our goal is to find equitable solutions at the lowest possible level. These procedures will be kept as informal and confidential as possible. This is to ensure equality and fair play for all concerned.

All grievances will go first to an employee's immediate supervisor for resolution. If the employee's immediate supervisor is involved in the grievance, then the BRINM human resources administration should be contacted.

If the problem cannot be solved at this level, the employee may seek assistance from the BRINM administrative office. Records must be kept of all grievances (exception: minor grievances settled with immediate supervisor).

Copies of all records will be sent to the BRINM administrative office.

FISCAL POLICIES

Acceptance and Deposit of Funds

All receipts must be made payable to BRINM, not to an individual. All funds accepted by BRINM must be accompanied by appropriate documentation as to the nature and use of the funds. PIs will be notified of receipt of funds. Separate accounting is kept for restricted and unrestricted funds. Separate accounting is also kept for each research project being conducted through BRINM. PIs will receive monthly financial statements that list a beginning balance, receipts and expenditures for the month and available balance.

Expenditures

Funds on deposit with BRINM may only be used in support of VA research or education activities. Expenditures for personnel costs, materials and supplies, equipment, travel, etc. must qualify as pertinent. Upon request for disbursement of funds from a BRINM project account, a brief explanation of the relationship that the expenditure has to VA research must be provided. Medical licenses or other expenses that would benefit an individual personally cannot be paid through BRINM.

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Reimbursement of VA Services

Specific medical center costs incurred for clinical/diagnostic/support services provided solely for the purpose of obtaining data on patients in a funded study, exclusive of routine patient care should be reimbursed. These reimbursements will be made from the appropriate research project account. Reimbursable services may include, but are not limited to: Imaging, Laboratory and Pharmacy. Projected medical center costs that may be generated beyond normal patient care are to be budgeted by the PI and reserved for payments against bills of collection from the NMVAHCS.

Purchase Requisition Orders

All requests for purchases should be submitted on a BRINM purchase requisition form. This form should be completed by the PI or designated individual. Once the Purchase Requisition is completed and signed, the original copy must be forwarded to BRINM, for approval. The approval process will ensure that sufficient funds are available and costs are reasonable.

A PI may purchase required supplies or equipment with personal funds or credit card and be reimbursed by BRINM when the purchase is substantiated with an original vendor receipt. Credit card receipts alone are not sufficient. The PI must complete a "Payment Reimbursement" and submit it to the BRINM accountant.

Payment Authorization

Upon receipt of an invoice in the BRINM administrative office, BRINM will forward a payment authorization form with a copy of the invoice to the PI or the designated individual to approve payment. The signature indicates that the item(s) being invoiced is correct and accounted for and authorizes payment from the stated project account. Once the signed payment authorization is returned, a check will be issued for the invoice total in the next check disbursement.

Payment for Subject Participation

A research protocol may involve payment to participants using BRINM funds for participation in the project. Before a participant can be paid, the Research Committee must approve the project. The project must also have Human Research Review Committee (HRRC) approval. Finally, an approved Consent Form must also be completed and signed by the participant(s).

A PI can request reimbursement for a participant by completing a BRINM-SOP-411 Form 1, Payment Request for Participant Participation, or on BRINM-SOP-411 Form 2, Payment Request for Participant Travel Reimbursement (see Appendix for forms). Upon approval by BRINM and with sufficient notice, a debit card will be issued to the participant. The debit card will be given to the study coordinator for distribution.

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Subscriptions/Memberships

BRINM is committed to fostering access to scientific information that allows VA and BRINM personnel to remain current in their fields and apprised of cutting edge developments for the benefit of VA research and education. This involves subscribing to published journals and e-journals as well as facilitating VA investigators' full participation in scientific and educational organizations and conferences.

Expenditures for continued education, including scientific books, conference and registration fees, society memberships, etc., specifically relating to a research activity may be requested by submitting the appropriate paperwork to BRINM. Subscriptions or professional association dues, with the exclusion of license fees, may be paid from appropriate research or general operating funds. All dues and subscriptions must list the address of the VA.

Expenditures for published journals and e-journals must be made from the investigator's residual account unless an approved protocol specifically calls for the subscription then the project account may be charged.

Everything paid for by BRINM on behalf of an Investigator must support approved research programs or education activities. If the fund account indicated is a general donation, the investigator must certify that the expense is within the scope of the donor's intent.

Organizational memberships cannot be paid for by BRINM funds unless that membership is necessary to receive the organization's journal or publications.

Everything that is ordered and paid for by BRINM must come directly to the VA facility. This means that subscriptions to journals and other publications cannot be sent to the investigator's home or to another location. If the address information is different from the VA facility, all changes must be made by the investigator. Any incomplete requests will be returned to the investigator. Renewals can only be made for one year at a time.

The investigator must complete a BRINM Subscription Reimbursement form (see Appendix A) request indicating in what way the particular publication or subscription impacts on the specific research project.

Honoraria for Guest Speakers and Consultants

Occasionally, speakers or consultants may be invited by a PI to give lectures or perform consulting work relating to his/her research project. Payment to the speaker/consultant will be in the form of an honorarium. In order to assure that proper payment is made, the PI should submit a memorandum to BRINM in advance of the event with the following information concerning the speaker/consultant:

- Full name
- Social Security Number
- Complete home address

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- A statement describing the nature of work that will be conducted and how it will benefit the research project. The anticipated amount to be paid the speaker/consultant, which will include airfare, per diem, speaker/consultant fee, and other incidental expenses

Upon completion of lecture or consulting work, the PI should complete the "Honoraria Form" and submit to the BRINM accountant for payment. Payment will be released once the BRINM accountant has received all original receipts and confirmation of the speaker/consultant fee.

Computer Equipment/Software

Upon approval by the NMVAHCS IRM department, BRINM will order the approved equipment/software. The equipment/software is delivered directly to the VA's Warehouse, who will contact IRM. IRM will make arrangement with the PI for installation of the equipment/software. BRINM must be notified that the delivery has been made. Many computer components, software, hardware, and etc. will qualify as equipment due to cost.

Computer equipment/software purchased with BRINM funds will be donated to the NMVAHCS. Under no circumstances shall the equipment/software be removed from its recorded location without a written request from the PI and written approval from NMVAHCS.

Transfer of Funds

If the investigator is moving to another VA, an academic nonprofit or other nonprofit research institution to continue an ongoing VA-approved research project, remaining BRINM funds attributable to that project may be transferred to that institution at the discretion of the BRINM Board of Directors. Equipment purchased with BRINM funds attributable to that project may also be transferred at the discretion of the Board of Directors. Sponsor notification and approval is usually required.

A letter must be received from the new corporation requesting the transfer and advising that they will accept responsibility for the research project, funds and equipment.

If such funds retain donor-imposed restrictions, BRINM may be required to return remaining funds to the donor.

If an investigator resigns before a project is completed, the investigator may request that another BRINM investigator assume responsibility for research or education activities with BRINM funding. This request requires either R&D Committee approval and/or IRB approval, and may require the approval of the BRINM Board of Directors and sponsor approval.

No funds or equipment may be transferred to for-profit organizations.

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The investigator should submit a written request to the Board of Directors for review. This request should be sent through the Executive Director as soon as possible in order to obtain necessary information for review by the Board.

If the request is approved, the transfer will be completed within a reasonable time. For transfer amounts above \$25,000, a longer period of time may be required to complete the transaction. Investigators are encouraged to notify BRINM well in advance of the need for major fund transfers.

Any residual funds and equipment attributable to completed research projects or educational activities must continue to benefit VA research or education. The Board may consider a request to transfer these funds to another VA-affiliated nonprofit corporation established under 38 U.S.C. §§7361-7368. A request may be made to the Board of Directors for those residual funds which are not eligible for transfer to be used to support another investigator's research or education activity.

Option for Additional Research Time

This policy addresses an option where the PI wishes to use his/her residual funds in BRINM to pay the NMVAHCS for additional research time. BRINM is able to assist investigators who wish to protect additional time for research and qualify to do so. The following steps should be used as a guide when an investigator is interested in this opportunity:

1. PI determines that he/she would like to spend time in addition to that currently available for the conduct of VA approved research. The PI must determine that he/she has sufficient funds available to consider this option.
2. PI discusses the use of a replacement clinician to cover the additional research time with his/her Service Chief.
3. PI, Service Chief and the NMVAHCS Director (or designee) negotiates the number of hours to be covered and the rate, which will be a fixed monthly cost.
4. PI must have no less than six (6) months' worth of funding for the replacement clinician available in BRINM prior to initiating the arrangement.
5. NMVAHCS will be responsible for hiring or contracting for the replacement clinician.
6. A BRINM account will be established specifically for reimbursement to the NMVAHCS and the amount of funding necessary to cover the term of the arrangement will be reserved.
7. The NMVAHCS will periodically bill BRINM for the amount agreed upon by the PI and the NMVAHCS. BRINM will pay NMVAHCS from the established account.
8. A Memorandum of Understanding (MOU) will be used to outline the terms of the agreement.

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9. The term of the arrangement will be the shorter of either, the length of time the PI desires to spend additional time on his/her research or the length of time the PI has funds available in BRINM to cover a replacement clinician.

In any case, such arrangements shall be made for no less than six (6) months

10. Some sources of federal funding prohibit the use of grant funds for purposes described in this policy. Therefore, the investigator must determine in advance whether any restrictions exist on the use of funds to reimburse VA for additional research time.

Support of Business Meetings and Small Conferences

Meetings, conferences, workshops, seminars, grand rounds, town halls, symposia, and other similar meetings are accepted features of conducting research and education. Additionally, certain events, such as retreats and board meetings as well as fundraising and public relations, are necessary for the conduct of business. Incidental to the business purpose of such meetings, it may be appropriate to serve meals or refreshments. The meals/refreshments (non-alcoholic) must be secondary to the activities.

Various regulations, Federal ethics standards, and the statute that authorizes non-profit corporations (NPCs) such as BRINM, influence whether expenditures related to such events are appropriate for BRINM support. Consequently, in order to be considered for BRINM support by direct payment or reimbursement, BRINM has established the following policy.

1. In order to be eligible for BRINM support, a meeting must have a documented research, education or BRINM business purpose. BRINM will not support “entertainment” expenses such as social activities, parties, ceremonial occasions or those that provide amusement.
 - For a **research related meeting**: A request for BRINM support must include an explicit statement about the research rationale for the event; that is, its research related purpose and how it will further VA research. Accompanying documentation should include the program, agenda or topic of discussion and a roster of attendees. When appropriate, the request should tie the meeting to an approved research project.
 - For an **educational program not related to research**: The education activity itself must first be approved by the VAMC Education Committee. Documentation should include an explicit statement of the purpose and how the program will further the VAMC’s and/or VA’s education and training mission, the agenda, program or topic of discussion, and a roster of attendees.
 - For **other BRINM business events**: A request must include an explicit statement of how the meeting will further the BRINM’s ability to facilitate research and education. Appropriate events include, but are not limited to

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retreats and board, annual membership and investigator meetings as well as fundraising, and public relations. Documentation should include the purpose, agenda, program or topic of discussion and a roster of attendees.

2. The types of meetings that may be eligible for BRINM support are too numerous to list and the characteristics of appropriate meetings may vary. However, factors that BRINM will consider when evaluating a meeting for support include:
 - Whether at least one speaker makes a research presentation or presents educational instruction
 - Whether there is a non-VAMC speaker and/or non-VAMC personnel are among the expected attendees.
 - The frequency of similar meetings that may involve the same personnel. Irregularly scheduled meetings and/or those that occur no more than monthly may be eligible for support; weekly meetings generally will not
 - Whether support is requested for routine VAMC staff, committee or department meetings. Generally, BRINM will not support meal expenses for such meetings.
 - Whether the meeting involves at least one individual who is being recruited to conduct research or education at the VAMC
 - Whether the meeting lasts more than two hours or extends through a normal mealtime

Regardless of the type of meeting, the documentation required in #1 above is a prerequisite for BRINM support.

3. Requests for BRINM support will be reviewed and approved by the individual designated by the board, generally the executive director or the executive director's designee. BRINM will provide direct payment or reimbursement for reasonable meeting costs based on submission of original receipts. In the event of disagreement, the request will be referred to a designated member of the board of directors or to the full board as appropriate.
4. BRINM encourages meeting organizers to obtain pre-approval of BRINM support for meetings. Such approval is not mandatory, but events lacking pre-approval may be denied support or may receive only partial support.

Travel Reimbursement

BRINM may support expenses for the domestic or foreign travel of authorized individuals to bona fide scientific meetings or for other research or research-related educational purposes. The travel support will be consistent with BRINM policies and the stipulations of any relevant funding source(s).

Reimbursement requests **must** be submitted within 60 days of end of travel. Requests received after 60 days require a justification for the delay and may be denied or considered as taxable income. Requests received after 120 days will be denied.

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If the travel reimbursement is for a visiting fellow or scholar, the visa status of the individual must allow such reimbursement. BRINM must pre-approve travel for foreign fellows or scientists.

Note: Original receipts are required for all reimbursements.

Cash advances of 80% of per diem and hotel as well as pre-paid airfare may be requested by using a BRINM Travel Advance form.

Travel advances must be requested prior to travel and will be advanced five (5) business days prior to the travel date. Requests for reimbursement, Request for Travel Reimbursement should be submitted within 30 days after travel has been completed.

If another organization is providing partial reimbursement for a trip, sufficient information must be provided to BRINM to show that BRINM is reimbursing appropriately. For example, the VA travel documents showing which items have been reimbursed and the amount.

Documentation of the meeting dates, location, and topic or theme must be provided. A program guide or brochure (a copy of the cover is sufficient if all the information is stated on it); an invitation letter; or other written documentation that includes the dates, location and purpose must be submitted with the reimbursement request.

Individual items \$25 or greater in cost must be accompanied by receipts. Items costing less than \$25 need only be itemized.

Registration: Meeting registrations can be pre-paid through BRINM directly to the meeting organizer, Registration-Conference Request Form. Alternatively, the registration cost will be reimbursed after the meeting along with other travel expenses.

Lodging: Full reimbursement of reasonable hotel expenses with appropriate documentation will be made. The original itemized hotel bill must be submitted with the reimbursement request. Any additional charges from the hotel for an extra person stay must be documented and provided to BRINM. BRINM will not reimburse for this additional charge.

Per Diem: The per diem reimbursement (meal and incidental expenses) will be at the federal per diem rate. Travel days will be paid at 75% of the federal rate, regardless of the time of departure.

If an investigator hosts a special meal meeting with research collaborators, these costs may be paid separately with a clear research rationale and compliance with the policy on "Support for Meetings and Conferences". Such events must be discussed with the Executive Director or designee to ensure that reimbursement will be allowable.

Transportation: Reimbursement for travel costs will be based on the most reasonable method of travel to the location, generally coach airfare. Travelers are encouraged to plan their travel far enough in advance to be able to receive the lowest available air fare.

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If the traveler chooses to take an indirect route, interrupt the business travel or utilize a mode of travel that requires additional accommodations enroute, any resulting expense will be borne by the traveler.

Please note:

- Reimbursement for ground transport is limited to travel between the home or place of business and the airport; the airport and meeting site and return
- Mileage expenses for private automobile use will be at published government rates. Reimbursements for travel using a private automobile will not exceed the cost of roundtrip coach airfare or the most reasonable travel method
- Coach airfare will be reimbursed. Any exceptions require prior approval from the Executive Director or designated authority

Vehicle Rental: Travelers are encouraged to use cost effective public transportation when available, but are authorized to rent vehicles when necessary. Travelers are encouraged to seek the lowest possible rate for compact vehicles.

BRINM recognizes the particular requirements of persons with disabilities and will make every effort to accommodate those needs. Please contact the BRINM administrative office for further information.

BRINM and VA employees are prohibited from accepting cash for reimbursement of expenses from other sources while being fully funded for travel by BRINM.

Alcoholic beverages: Please be reminded that BRINM will not pay for alcoholic beverages consumed on your trip.

Foreign Travel: **All** foreign travel should be reported to the foundation as soon as possible. An e-mail should be sent to the executive director specifying the following items:

- Name of Traveler
- Location of Travel
- Purpose of Travel
- Dates of Travel

VA Requirements: If you are a VA employee seeking reimbursement from BRINM for travel related to your research or education programs, there are additional procedures you must follow. As a government employee going on domestic or foreign travel, you are responsible for complying with the requirements of your employer.

For VA employees:

VA personnel must follow VA travel requirements and forms as well as BRINM travel policy and forms. All travel by VA employees paid by BRINM must be pre-approved in accordance with the appropriate policies of the Veterans' Health Administration (a request for authorized absence). This approval allows the VA salaried employees to travel on Authorized Leave.

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You are responsible for filling out [VA Authorized Absence Request Form OPM-71](#) if you plan to use "Authorized Absence" to attend any meeting. Attach a copy of this form to BRINM's Travel Request form.

NOTE: Persons traveling on BRINM funds cannot use government rate airfares. All BRINM paid travel will be at the basic coach rate. If you make changes to your ticket for which there are charges, you or your project will be charged for the changes.