Congressionally Directed Medical Research Programs Position on Research Duplication

Unnecessary duplication of funding, or accepting funding from more than one source for the same research, is prohibited. The Government Accountability Office defines unnecessary duplication as "duplicative research funding that is not necessary to corroborate or replicate prior research results for scientific purpose (reference February 2012 GAO report here)." While investigators are allowed to apply for funding for the same research from different funding agencies, applicants may not accept funding from more than one source. While the responsibility for avoiding unnecessary duplication of funding ultimately lies with research applicants and their institutional Business Officials, the Department of Defense (DoD) US Army Medical Research and Materiel Command (USAMRMC) Congressionally Directed Medical Research Programs (CDMRP) uses multiple standard processes and communications to minimize the likelihood of duplicating biomedical research funded by other agencies.

Congressionally Directed Medical Research Programs Procedures to Avoid Research Duplication

The CDMRP Procedures to Avoid Research Duplication is provided to inform applicants, awardees, other funding agencies, and the public on how the CDMRP avoids, identifies, and mitigates funding duplication throughout its science management model, including at application submission, peer and programmatic review, and negotiation and monitoring of funded awards. General financial regulations guiding applicant institutions may be found in the Administrative and Cost Principles section of the General Application Instructions (http://cdmrp.army.mil/funding/default.shtml) that accompanies each of the CDMRP program announcements used for soliciting research applications. It is the responsibility of the Principal Investigator and the applicant institution to comply with these Administrative and Cost Principles.

Application Submission: For each research application, a comprehensive list of previous,

current, and pending funding support for the principal investigator and all key personnel must be submitted at the time of application submission in accordance with the General Application Instructions. Because duplication of research is difficult to assess from project titles and abstracts alone, the title, time commitments, supporting agency, name and address of the funding agency's procuring Contracting/Grants Officer, performance period, level of funding, brief description of the project's goals, and list of the specific aims must be provided. The applicant is responsible for either identifying where the proposed research overlaps with other previous, existing, and pending research projects, or stating that there is no overlap. The General Application Instructions further state that an updated previous, current, and pending support document is required during award negotiations.

Scientific Peer and Programmatic Reviews: During Peer Review, the peer reviewers, who have extensive knowledge of the subject they are reviewing, are tasked with providing feedback to the CDMRP program office regarding whether the proposed research has already been published or is the subject of an application to another funding agency, and if the level of effort of the principal investigator and all key personnel is appropriate. The peer reviewers consult the previous, current, and pending support documentation provided with the application to assist with this process. Their comments are captured in the peer review summary statement and also as administrative notes, both of which are reviewed by the CDMRP Science Officer during award negotiations. Programmatic Review, the second tier of application review, is conducted by each program's advisory panel, who ultimately recommends research projects for funding. These panels typically include representatives from other relevant federal funding agencies, such as the NIH, the CDC, and/or the VA who provide information regarding the research being funded in related areas by their own organizations. The Programmatic Review panels provide additional feedback as to whether the research proposed has been published previously and, when possible, whether it has been funded by another agency. All suggestions of potential overlap are further investigated by CDMRP Science Officers during award negotiations.

Negotiations and Research Award: After a project has been recommended for funding, the Principal Investigator and institutional Business Official receive a funding status notification letter. Prior to the start of the award negotiations, updated support that is certified by the institution's Business Official as current, accurate, and addressing any scientific or financial

overlap is required. The CDMRP Science Officer thoroughly reviews the updated previous, current, and pending research support documents, as well as notes from peer and programmatic review, for potential scientific overlap or level of effort over-commitment. The Science Officer also uses the CDMRP's internal grants management database, NIH's ERA Commons system, NIH RePORTER (http://projectreporter.nih.gov/reporter.cfm), the International Cancer Research Partnership (https://www.icrpartnership.org/), and other program-specific sites to investigate potential overlap between the DoD award and other projects funded or submitted for funding to other federal or non-federal agencies. Any potential level of commitment overlap and/or research duplication must be resolved prior to making an award. The Science Officer coordinates with the CDMRP Program Manager and subsequently the Principal Investigator to delete or modify duplicative tasks and reduce funding as appropriate. If the proposed research is duplicative in its entirety with another funded research project or is found to have overlap or duplication that cannot be resolved, the applicant is required to withdraw the application from the DoD or relinquish the other source of funding.

Monitoring of Funded Research Awards: The Principal Investigator and institutional Business Official are required to inform the CDMRP if, at any time during the lifetime of the award, funding for any part of the research that is the subject of the CDMRP award becomes duplicative. Throughout the award's period of performance, potential duplication and overlap is monitored during review of progress reports (annual, final and, for some awards, quarterly). As an addendum to each annual and final progress report, the Principal Investigator submits updated certified current support for all senior/key personnel working on the research project. The CDMRP Science Officer uses this information, as well as support acknowledged in publications or other outcomes resulting from the award, to continually monitor research overlap. If overlap or duplication is identified, the Science Officer and CDMRP Program Manager notify US Army Medical Research and Acquisition Activity (USAMRAA- USMRMC's contracting office) and a stop payment order is issued until the suspected overlap is resolved. If the issue cannot be resolved, USARMAA will terminate the award and the money is returned to the government.