WHAT I LEARNED AT SRA

March 2018
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Office of Budget, Finance & Award Management
Division of Institution & Award Support
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TOPICS

• NSF Budget and Personnel Changes
• PAPPG Significant Changes
• Policy FAQs
• NSF Important Notice on Harassment
• Account Management Changes
• Proposal Submission Modernization
• NSF Outreach
NSF BUDGET

- FY 2018: Congress passed another continuing resolution for FY 2018 that funds the government through March 23rd.

- FY 2019: President’s FY 2019 NSF request was set to be released at $5.27 billion, a 30% decrease from FY 2017.
  - Additional funding of $2.2 billion as a supplemental request to $7.47 billion – flat funding to FY 2017

- NSF to publish FY 2019 budget request the week of February 26th
PAPPG IMPLEMENTATION

• October 30, 2017 – Released to the community

• January 29, 2018 – Effective date
PAPPG SIGNIFICANT CHANGES

• Revises eligibility standards to:
  ▪ Add a new subcategory for Institutions of Higher Education
  ▪ Revises the eligibility of foreign organizations
  ▪ Solicitations can add more restrictive language
PAPPG SIGNIFICANT CHANGES (CONT’D)

• Increases the budget justification from three-page limit to five-page limit

• Implements current pilot on Collaborators and Other Affiliations (COA)
  ▪ COA template will now mirror content of PAPPG
  ▪ New footnotes have been added to address frequently asked questions
  ▪ More expansive FAQs are available at:
• Specifies that the Project Description must contain, “as a separate section within the narrative, a section labeled “Intellectual Merit.”

• Clarifies that the five year period of support in Results from Prior NSF Support means “an award with an END date in the past five years or in the future...”
Reminds organizations that it is their responsibility to define and consistently apply the term “year” in the Senior Personnel Salaries and Wages Policy section.
PAPPG SIGNIFICANT CHANGES (CONT’D)

Updated vertebrate animals coverage:

- Adds new language that reflects the new award-specific condition on organizational responsibilities for the life of the grant.

- Guidance further states that “additional IACUC approval must be obtained if the protocols for the care and use of vertebrate animals have changed substantively from those originally proposed and approved.”

- Supplements do not require a separate IACUC approval letter unless the scope of the project has substantively changed, in which case a new signed IACUC approval letter is required.
PAPPG SIGNIFICANT CHANGES (CONT’D)

Updated human subjects coverage:

• Adds language to reflect the organizational responsibilities regarding the use of human subjects for the life of the grant.

• Adds language on post-award responsibilities stating that “IRB approval must be obtained if the protocols for the use of human subjects have been changed substantively from those original proposed and approved.”

• Adds language regarding supplemental funding. Such requests do not require a separate IRB approval letter. However, if the scope of the project has been substantively changed, a new signed IRB letter is required.
PAPPG SIGNIFICANT CHANGES (CONT’D)

• Removes Exhibit VII-I, Grantee Notifications and Requests for Approval from the PAPPG.
  - Grantee Notifications are in Chapter VII.
  - Requests for Approval are in the Research Terms and Conditions, Appendix A

• Streamlines Allowability of Costs Chapter to remove sections that simply restate the Uniform Guidance.
## Research Terms & Conditions

### Appendix A – Prior Approvals Matrix

**Prior Approval Matrix**
October 1, 2017

<table>
<thead>
<tr>
<th>Prior Written Approval (prior approval)*</th>
<th>Reference</th>
<th>RTC Overlay</th>
<th>NSF</th>
<th>DOE</th>
<th>NIH</th>
<th>USDA NIFA</th>
<th>DOC</th>
<th>NASA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts</td>
<td>200.467</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Use of recovered indirect costs, including indirect costs on cost sharing or matching</td>
<td>200.390(a)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Use of current fair market value to determine the value of non-Federal entity donations of services and property for the purposes of cost sharing or matching</td>
<td>200.390(b)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land</td>
<td>200.390(c)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Program Income</td>
<td>200.390(d)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Revision of budget and program plans</td>
<td>200.390(e)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Change in the scope or the objective of the project or program</td>
<td>200.390(f)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Change in PIPD specified in the application or Federal award</td>
<td>200.390(g)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Disengagement from the project for more than three months, or 25 percent reduction in time devoted to the project by the approved PIPD</td>
<td>200.390(h)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E – Cost Principles</td>
<td>200.390(i)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Transfer of funds budgeted for participant support costs to other categories of expense</td>
<td>200.390(j)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Subawarding, transferring or contracting out any work under a Federal award. This provision does not apply to the acquisition of supplies, materials, equipment, or general purpose services</td>
<td>200.390(k)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Changes in the approved cost-sharing or matching provided by the non-Federal entity</td>
<td>200.390(l)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
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</tr>
<tr>
<td>Need for additional Federal funding to complete the project</td>
<td>200.390(m)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
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</tr>
<tr>
<td>Incur project costs 90 calendar days before the Federal awarding agency makes the award</td>
<td>200.390(n)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Incur project costs more than 90 calendar days prior to award</td>
<td>200.390(o)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Initiate a one-time extension of the period of performance by up to 12 months</td>
<td>200.390(p)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Subsequent no-cost extension or extension of more than 12 months</td>
<td>200.390(q)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Carry-forward of unexpended balances to subsequent funding periods</td>
<td>200.390(r)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa</td>
<td>200.390(s)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Rebudgeting among direct cost categories for Federal awards in which the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the approved budget</td>
<td>200.390(t)</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
<td>Waived</td>
</tr>
<tr>
<td>Transfer of funds between construction and non-construction activities</td>
<td>200.390(u)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Real Property</td>
<td>200.390(v)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Encumber real property acquired with Federal funds</td>
<td>200.390(w)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Transfer of title to the Federal awarding agency or to a third party</td>
<td>200.390(x)</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
</tbody>
</table>
POLICY FAQS – PARTICIPANT SUPPORT COSTS

• May I include conference speaker fees in the participant support costs section of the budget?
  ▪ No, the participant support category is for the support of participants or trainees only. Speakers and trainers are not considered participants and should not be included in this section of the budget.

• We would like to rebudget our NSF award to move funds out of the participant support category. Do we need NSF approval to do this?
  ▪ Yes. While NSF does provide rebudgeting authority for many categories, you must receive the approval of the cognizant NSF program officer to reallocate funds out of the participant support category. You may, however, rebudget funds into this category without prior NSF approval (unless you’re trying to move funds into the “other” category of participant).

• Are costs such as room rental fees, catering, supplies, etc. related to an NSF-sponsored conference considered participant support costs?
  ▪ No, the participant support cost line in the NSF budget should not be used for such costs.
POLICY FAQS – PARTICIPANT SUPPORT COSTS

• Do participant support costs apply for all participants, or do they only apply for non-awardee organization participants?
  ▪ Participants from the proposing organization and other organization(s) could be considered participants.

• May human subjects that are being paid as survey takers be considered participants?
  ▪ No, the participant support section of the budget may not be used to provide incentive payments to research subjects. Human subject payments should be included on line G6 of the NSF budget under “Other Direct Costs,” and indirect costs should be calculated on the payments in accordance with the organization’s federally negotiated indirect cost rate.

• Is it acceptable to categorize students as both employees and participants in a REU proposal if we have made the appropriate determination?
  ▪ No, the REU program is different. The goal of the program is to provide a practical educational experience for undergraduate students, rather than simply a job. The role of an REU student differs from the role of a student employee because the REU program is aimed at developing the students’ research skills and providing a high-quality mentoring experience. Based on this role, an REU student is considered a participant in a training activity and funds for their support should be included as a stipend in the participant support cost section of the budget.
IMPORTANT NOTICE 144 ON HARASSMENT

NSF has developed a new draft award term and condition that will require organizations to notify NSF:

• 1) of any findings/determinations regarding the PI or any co-PI

• 2) if the awardee places the PI, or any co-PI on administrative leave

• Such notification must be submitted by the Authorized Organization Representative via email to NSF’s Office of Diversity and Inclusion at: harassmentnotifications@nsf.gov within seven business days from the date of the finding/determination or the awardee’s placement of the PI or co-PI on administrative leave.
IMPORTANT NOTICE ON HARASSMENT (CONT’D)

• Awardee findings/determinations and placement on administrative leave during investigation must have been conducted in accordance with organizational processes and policies that are consistent with federal law and regulation. See, e.g., NSF Research Terms and Conditions, Appendix C.
  ▪ NSF will solicit feedback on this new award term and condition through the Federal Register (FR) process. The community will have 60 days to comment. Published in the FR on Monday, March 5th.

• Harassment-Free Research Workplaces
  ▪ NSF expects all awardee organizations to establish and maintain clear and unambiguous standards of behavior to ensure harassment-free workplaces

• Enhanced Web Resources
  ▪ NSF recently launched a dedicated web portal to consolidate policies and procedures, promising practices, and frequently asked questions relating to sexual and other forms of harassment.
  ▪ Visit www.nsf.gov/harassment
MODERNIZING ACCOUNT MANAGEMENT

• NSF is modernizing its grant systems to streamline the user experience for maintaining accounts and centralizing access.

• A person’s NSF ID will be used to manage his/her profile data and permission information.

• The new functionality will be launched in March 2018 in Research.gov.

• Initial release will be for PIs, SPOs, AORs, Administrators, ACM$ users and GRFP Coordinating and Financial Officials.

• Beginning March 26th, existing users will be migrated to the new system and will confirm their account information.

• Stay tuned for additional details including account management FAQs and training resources.
MODERNIZING ACCOUNT MANAGEMENT

Account Registration

- NSF Proposal & Award Policies & Procedures Guide (PAPPG) specifies that each individual user of NSF systems should not have more than one NSF ID (Chapter I.G.4 NSF ID). For more information, please visit [Frequently Asked Questions](#).

**Required Fields**

- **Prefix:**
  - Select One

- **First Name:**
  - 

- **Middle Name:**
  - 

- **Last Name:**
  - 

- **Suffix:**
  - Select One

- **Alternate Name(s):** Nickname, maiden name, etc.
  - 

- **Primary Email:**
  - 

- **Confirm Primary Email:**
  - 

- **Secondary Email:**
  - Confirm Secondary Email
  - 

- **ORCID ID:** 16-digit ID, 1234-1234-1234-1234
  - 

- **Phone Number:**
  - 

- **I'm not a robot:**
  - [reCAPTCHA](#) Privacy Terms

- **I confirm that I am at least 13 years of age:**

- **Save & Preview**
- **Cancel**
MODERNIZING ACCOUNT MANAGEMENT

Add a New Role

Welcome to the Add a New Role page. Here you can:
- Request one or more user roles
- Register a new organization by clicking on the “Add Organizational Role” button
- Get more information about a role category by clicking on the role details link below each button

For help and more information go to the About Account Management page

Select one to work on proposal and award activities.

Prepare Proposals and Manage Awards

- Principal Investigator (PI) / co-Principal Investigator (co-PI)
- Postdoctoral Fellowship Investigator
  - Add Investigator Role
  - Principal Investigator role details

Add and Manage Organizations

- Administrator (Admin), Authorized Organizational Representative (AOR), Sponsored Projects Officer (SPO), View Only User
  - Add Organizational Role
  - Organizational role details

Manage Financials in Award Cash Management Service (ACM$)

- Award Preparer, Awardee Certifier, Awardee Financial Representative
  - Add Financial Role
  - Financial role details

Register as a Graduate Research Fellowship Program (GRFP) Official

- Coordinating Official (CO), Alternate Coordinating Official (Alt.CO), Financial Official (FO)
  - Add GRFP Official Role
  - GRFP role details
MODERNIZING ACCOUNT MANAGEMENT

Administrator’s Dashboard

View My Users

Welcome to the View My Users page. Here you can:
- Manage existing user roles for your organization
- Approve pending role requests
- Add new users to your organization

For help and more information go to the About Account Management page

Pending Role Requests

Claude Elton
IDaho FRESH COOPERATIVE INC
c@ct.com
Manage Roles
Add User

Role(s)
Date Added
Awardee Preparer
01/31/2018
Principal Investigator / co-Principal Investigator (PI) Info Needed
01/15/2018

Add User
MODERNIZING ACCOUNT MANAGEMENT

Migrating Existing Users

Verify Your Information

NSF is updating its account management system and we need you to verify your account information. This is a one-time process.

On the next screen, you will be asked to review your account’s primary email address and phone number.

If you have questions, please contact the NSF IT Help Desk at 1-800-381-1532 or rgov@nsf.gov.

Verify Your Information

Please verify your primary email address and phone number. After this one time verification process, you will be able to make future updates to this account information in My Profile.

Charles A Bobrow-Strain (NSF ID: 000300002)

Required

* Primary Email

cabs@socrates.berkeley.edu

* Phone Number

5555555555

Next
PROPOSAL SUBMISSION MODERNIZATION (PSM)

• PSM is a multi-year initiative to modernize the proposal submission capabilities currently in FastLane and implement new capabilities in Research.gov.

• It aims to reduce the administrative burden to the research community and NSF staff associated with preparation, submission, and management of proposals.

• Beginning **February 26, 2018**, NSF will preview the new Research.gov proposal preparation interface to the community for feedback and for a chance to get used to the new environment.

• In late **April 2018**, proposers will be able to prepare and submit non-collaborative research proposals in Research.gov
PSM FEBRUARY AND APRIL RELEASES

• The February preview will allow PIs to:
  ▪ Initiate proposal
  ▪ Add Co-PIs, Senior Personnel, and Other Authorized Users
  ▪ Upload required proposal documents
  ▪ Create budget
  ▪ Check compliance
  ▪ Enable SPO/AOR access for review

• In April, the initial release will allow submission of Full, Research non-collaborative proposals, enabling the following features:
  ▪ AOR Submission
  ▪ Proposal File Update & Budget Revision

• Subsequent releases will enable additional features
Create New Proposal Wizard

- User chooses the applicable proposal type
- The choices shown here will be customized to the funding opportunity based on enhancements to PIMS that will be made in FY18-FY19

• Indicator shows required proposal setup process steps that addresses current frustrations with the FastLane Cover Sheet module
**PROPOSAL SUBMISSION MODERNIZATION**

**Proposal Sections**

<table>
<thead>
<tr>
<th>Required</th>
<th>Last Updated</th>
<th>Compliance Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cover Sheet</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>Project Summary</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>Project Description</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>References Cited</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>Data Management Plan</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>Postdoctoral Mentoring Plan</td>
<td>Conditionally required</td>
<td>Not checked</td>
</tr>
<tr>
<td>Senior Personnel Documents</td>
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<td>Not checked</td>
</tr>
<tr>
<td>Facilities, Equipment and Other Resources</td>
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<td>Not checked</td>
</tr>
<tr>
<td>Budget(s)</td>
<td></td>
<td>Not checked</td>
</tr>
<tr>
<td>Budget Justification(s)</td>
<td></td>
<td>Not checked</td>
</tr>
</tbody>
</table>

**Optional**

| Other Personnel Biographical Information |              | Not checked       |
| List of Suggested Reviewers            |              | Not checked       |
| List of Reviewers Not to Include       |              | Not checked       |

**Proposal Actions**

- Allow SPO Access
- Check Proposal Compliance
- Print Proposal
- Delete Proposal

**Personnel Access**

- Your role(s):
  - Authorized Organizational Representative (AOR), Sponsored Program Officer (SPO), Principal Investigator (PI)
- Manage Personnel

**Collaborative Status**

- Lead proposal
- Link(s): Not linked
- Link Collaborative Proposals

**Inline edit of the title**

- Conditionally required sections become required after corresponding data is input

- Add and Remove Co-PIs, Senior Personnel, and OAUs
- Quick access to link Collaborative proposals
Immediate feedback on compliance of all documents that are uploaded to the system.
PROPOSAL SUBMISSION MODERNIZATION

- Rows expand and collapse for easy navigation
- Multiple years displayed on one screen
- All totals are dynamically summed and the total amount is placed on the cover sheet

### Budget(s)

For Virginia Polytechnic Institute and State University

More years have been added than can fit in the table. Click the arrows in the table headers or total rows to view the next years. Total funds requested will continue to show the total for all years in the budget. To view additional years simultaneously hide the page’s left navigation menu.

<table>
<thead>
<tr>
<th>Section</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Total Funds Requested</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Senior Personnel</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ricky I Researcher (PI)</td>
<td>1</td>
<td>1</td>
<td>$70,000</td>
</tr>
<tr>
<td><strong>B. Other Personnel</strong></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Postdoctoral Scholars</td>
<td>1</td>
<td>1</td>
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<tr>
<td>Graduate Students</td>
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<td>Undergraduate Students</td>
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<td>$0</td>
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<tr>
<td>Administrative/Clerical</td>
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<td>$0</td>
</tr>
<tr>
<td>Other</td>
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<td>$0</td>
</tr>
<tr>
<td><strong>C. Fringe Benefits</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total Requested Amount: $161,200
PROPOSAL SUBMISSION MODERNIZATION

- Video demonstration available online.
- Preview began February 26, 2018
- Launch in April will only be available for non-collaborative research, full proposals
- Future releases will enable other proposal types and features

https://www.youtube.com/watch?v=tbU5agcTe1o&feature=youtu.be
• Quarterly newsletter

• Stay abreast of policy and procedural developments

• Next edition will be March 2018
• Registration opened on March 15th
• Click “Get Notified” for reminders about registration and other conference and outreach opportunities
Ask Early, Ask Often!

policy@nsf.gov
NIH Grants Policy Update

SRA 2018 Northeast/Western Section Meeting

Presenter:
Pam Fleming, Chief Grants Management Officer, NIDA, NIH
NIH FY18 Budget News

• NIH is funded under the Continuing Appropriations Act, 2018 (P.L. 115-56) as amended by the Bipartisan Budget Act of 2018 (PL 115-123), which funds the government until March 23, 2018.

• Funding is continued at 99.32 percent of the FY 2017 level

• All FY2017 legislative mandates remain in effect

• Salary Cap set at Executive Level II salary level ($189,600).

See NOT-OD-18-136 and NOT-OD-18-137
FY 2018 NIH Grants Policy Statement

The updated NIHGPS was posted on October 12, 2017.

• The revised Grants Policy Statement is applicable to all NIH grants and cooperative agreements with budget periods beginning on or after October 1, 2017.

• A summary of the significant changes is available online.

NIH continues to publish interim grants policy changes through the issuance of NIH Guide Notices via the NIH Guide for Grants and Contracts.

See NOT-OD-18-005
Administrative Relief for Hurricane-Affected Areas

NIH has worked with OMB and HHS to identify short-term administrative relief actions for areas affected by Hurricanes Harvey, Irma and Maria

- Extension of Financial and other Reporting
- Prior Approval reminder – prior approval is not required for rebudgeting, unless there will be a change in scope
- Extension of currently approved F&A Rates
- Extension of Single Audit Submission
- Alternatives for record retention and cost documentation
- Expenditure of award funds for salaries – *must follow your organization’s policies*
- Extension of Closeout

See [NOT-OD-18-114](#)
Reminder – Recent Changes

• Effective for due dates on/after January 25, 2018.
  • “Forms-E” grant application should be used – includes new Human Subjects and Clinical Trials Information Form (NOT-OD-17-119)

• All applications involving one or more clinical trials must be submitted through a FOA specifically designated for clinical trials (NOT-OD-18-106) – Note any new review criteria!

• Multi-site studies involving non-exempt human subjects research funded by the NIH, are expected to use a single Institutional Review Board (sIRB)
  • Additional implementation guidance (NOT-OD-18-004) and information on exceptions (NOT-OD-18-003) is now available.
Policy Updates
21st Century Cures Certificates of Confidentiality

• Section 2012 of the 21st Century Cures Act – Requires the Secretary of HHS to issue Certificates of Confidentiality (CoCs) to investigators or institutions engaged in:
  • Biomedical
  • Behavioral, or
  • Other research in which identifiable, sensitive information is collected

• CoCs protect researchers from being forced to disclose their research information in response to subpoenas or other legal requests

See NOT-OD-17-109
# Certificates of Confidentiality

The 21st Century Cures Act required changes to NIH CoC Policy.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Previous Authority</th>
<th>Current Authority</th>
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</table>
| How to get one                | Issued upon approval of application                     | • NIH-funded – automatic  
|                               |                                                         | • Non-NIH funded – upon application                                                |
| Disclosure                    | PI/ Institution could voluntarily disclose              | Disclosure is prohibited unless specifically allowed by statute or with consent |
| Admissibility as evidence     | Information protected by a CoC could be used in a legal proceeding if disclosed | Protected information cannot be used in a legal proceeding even if it is disclosed elsewhere |
| Copies of information         | Unclear; typically advised to amend or extend           | All information, including copies, is protected                                   |

See [NOT-OD-17-109](#)
“Type 2” Policy Change

In order to maximize transparency, NIH has updated its renewal application policy.

- **NIHGPS Chapter 8.6.2** no longer states that “whether funded or not” the progress report contained within the renewal application may serve in lieu of a separate final progress report.

This change aligns NIH’s final performance reporting requirement with the requirements of other Federal research awarding agencies.
RPPR Implementation

• **Annual RPPR** – describes a grant’s scientific progress, identifies significant changes, and describes plans for the subsequent budget period.

• **Interim RPPR** – use when submitting a renewal (Type 2) application. If the Type II is funded, the Interim RPPR will serve as the annual RPPR for the final year of the previous competitive segment. The data elements collected on the Interim RPPR are the same as for the Final RPPR, including project outcomes.

• **Final RPPR** – Use as part of the grant closeout process to submit project outcomes in addition to the information submitted on the annual RPPR, except budget and plans for the upcoming year.

Reminder – Final RPPRs are now required for all grants. NIH is no longer accepting the Final Progress Report format!

See [NOT-OD-17-022](#) and [NOT-OD-17-085](#)
Project Outcomes

NIH will publish the Project Outcomes Section of all Final and Interim RPPRs submitted on or after October 1, 2017.

• Will be available to the general public via the NIH RePORTER.

• Reviewed and approved by NIH staff to ensure the narrative is written for the general public in clear and comprehensible language.

• Should not include any proprietary, confidential information or trade secrets.

• Allow recipients to provide the general public with a concise summary of the cumulative outcomes or findings of the project.

See NOT-OD-18-103
Closeout Enforcement

NIH is strengthening enforcement of longstanding closeout requirements.

- Recipients must submit timely, accurate closeout reports
- Reports are LATE after 120 calendar days
  - NIH may allow late submission with prior approval (i.e., acceptable written justification)
  - Cash transaction data is submitted directly to PMS
  - Recipient responsibility to reconcile FFR and FCTR data

When recipients fail to submit timely reports NIH will initiate unilateral closeout.

- When no FFR is submitted, HHS policy directs NIH to close the grant using the last accepted FCTR
- This could be considered a debt or result in disallowed costs

See NOT-OD-18-107
Documentation of Personnel Expenses

NIH has clarified the applicability and flexibility of the requirements for documentation of personnel expenses for its grants and cooperative agreement recipients.

- Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed.

- Budget estimates alone do not qualify as support for charges, but may be used for interim accounting purposes.

- Records may reflect categories of activities expressed as a percentage distribution of total activities.

- When recording salaries and wages charged to Federal awards for Institutes of Higher Education, a precise assessment of factors that contribute to costs is not always feasible, nor is it expected.

See NOT-OD-18-108
Inclusion Policy Changes

Individuals of all ages, including children, must be included in all human subjects research conducted or supported by NIH, unless there are ethical reasons not to include them.

- Applies to all competing grant applications for due dates on or after January 25, 2019.

- Policy has been expanded to include individuals across the lifespan.

- Clinical research studies are expected to submit individual level data on sex/gender, race, ethnicity and age at enrollment with annual progress reports.

See NOT-OD-18-116
Federal Policy for the Protection of Human Subjects

The Final Rule (45 CFR part 46) is intended to enhance protections for human research participants, facilitate valuable research, and reduce burdens for investigators, research institutions, and Institutional Review Boards (IRBs).

***HHS has announced an Interim Final Rule that delays the effective date and general compliance date to July 19, 2018.***

- Studies that have not undergone initial IRB review will be subject to the new Final Rule requirements.
- Research ongoing on that date will continue to be subject to the current Common Rule requirements.

Note: The NIH policy on the use of single IRBs in multi-site studies took effect in January 2018.

See NOT-OD-17-038 and NOT-OD-17-040
Integrity in Peer Review

Maintaining integrity in the peer review process is essential. Officials at applicant organizations, PIs, and other individuals named in applications or proposals:

- Should not contact reviewers on the study section evaluating their application. The only acceptable process for communication is through the NIH Scientific Review Officer or Contracting Officer.
- Should not send information or data directly to a reviewer on the study section evaluating his/her application.
- Should immediately contact the SRO if contacted by a reviewer or other individual named in another application, outside of the channels described above.

See NOT-OD-18-115
Integrity in Peer Review

- Each peer reviewer must read the NIH Confidentiality and Non-Disclosure Rules, and certify that he or she fully understands and will comply with the confidential nature of the review process.

- When certifying the Confidentiality Agreements, each peer reviewer agrees, under penalty of perjury, 18 U.S.C. §1001, to maintain confidentiality in peer review.

- If NIH determines that a situation involves a breach of integrity, NIH may take action including, but not limited to:
  - Notifying the individuals and institutions involved
  - Terminating the reviewer’s or Council member’s service
  - Pursuing a referral for government-wide suspension or debarment
  - Referring the matter to the NIH Office of Management Assessment and possibly to the HHS Office of Inspector General, which could result in criminal penalties, fines, imprisonment, and/or other actions

See NOT-OD-18-115
Electronic Submission & eRA Commons
Diversity Supplements

Effective January 25, 2018, all applications for (single and multi-project) diversity supplements must be submitted electronically.

- Options available to submit electronically include NIH ASSIST, Institutional system-to-system (S2S), Grants.gov Workspace and streamlined system through eRA Commons.

- Within Section D.1 of the RPPR, recipients are required to identify whether an individual that has worked on the award is supported by a Diversity Supplement.
  - Institutions with a non-competing continuation award that includes diversity supplement support will be required to identify at least one participant that is supported by the diversity supplement.

See NOT-OD-18-111
Automated Post Award Changes

Effective March 2, 2017, recipients of NIH awards can submit the following prior approval requests electronically through eRA Commons.

Prior Approval Request for Change of PD/PI
SOs can initiate the request for a Change of Program Director/Principal Investigator (PD/PI) electronically through eRA Commons via Prior Approval.

Prior Approval Request for No Cost Extension (NCE)
SOs will be able to request NCEs (in addition to the requests made under expanded authority) electronically through eRA Commons via Prior Approval.

For additional details please see eRA Commons Online Help
Tips for e-Submission Success

Register Early!

• Required registrations
  • System for Award Management (SAM)
  • Grants.gov
  • eRA Commons
  • DUNS
  • SBA (for small business applicants only)

• Submit early, and correct any errors before due date

• View your application in Commons
  • If you can’t VIEW it, NIH can’t REVIEW it!
Policy Reminders
Timely Progress Reports

- Annual Progress Reports = RPPR Format
- Due Dates
  - Non-SNAP: Approximately 60 days before the start of next budget period
  - SNAP: Approximately 45 days before start of the next budget period
  - Multi-Year Funded: on or before anniversary date

Searchable list to determine which progress reports are due: https://public.era.nih.gov/chl/public/search/progressReportBylpf.era
Timely Financial Reporting


Annual (Non-SNAP Awards)
• FFR submitted no later than 90 days after the end of the calendar quarter in which the budget period ended

Final (SNAP and Non-SNAP Awards)
• FFR submitted within 120 days following the end of the project period
Invention Reporting

• NIH recipients must file the HHS 568 at the conclusion of an NIH award

• All subject inventions reported on the HHS 568 must be reported in iEdison.

• Failure to report all inventions may result in your organization’s loss of rights in the invention or other actions as appropriate.

See NOT-OD-16-066
Educational Outreach
OLAW Educational Outreach

OLAW free quarterly webinars series:
http://grants.nih.gov/grants/olaw/e-seminars.htm
  Recordings of past webinars
  http://grants.nih.gov/grants/olaw/educational_resources.htm

Disaster planning resources:
http://grants.nih.gov/grants/olaw/disaster_planning.htm
  Disaster planning webinar & FAQ
Save the date:
2018 regional seminars

Spring Regional Seminar:
Washington, DC
May 2-4, 2018

Registration now open!

See NOT-OD-18-013
Helpful NIH Resources
RPPR Resources

RPPR Webpage: http://grants.nih.gov/grants/rppr/

Includes links to:

- RPPR Application Guide
- RPPR Guide Notices
- Frequently Asked Questions
- Training
- Contacts
Clinical Trial Requirements for Grants and Contracts

NIH is launching a series of initiatives that are rolling out in 2017-2018 to enhance the accountability and transparency of clinical research. These initiatives target key points along the whole clinical trial lifecycle from concept to results reporting. Learn more about these changes and how they will affect your research.

NIH Definition of a Clinical Trial

A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of those interventions on health-related biomedical or behavioral outcomes. Learn more.

On This Page:
- Why Changes to Clinical Trial Policies?
- Good Clinical Practice Training
- Clinical Trial-specific Funding Opportunities
- Clinical Trial-Specific Review Criteria
- New Human Subject and Clinical Trial Information Form
- Single IRB Policy for Multi-site Research
- Clinical Trials Protocol Template
- Clinicaltrials.gov Registration and Reporting
Frequently Asked Questions

FAQs – searchable websites for:

- Application/progress report preparation, funding initiatives, policies, human subjects, animals, disaster response, PMS Subaccounts, Core Facilities, FCOI, sIRB, etc…

http://grants.nih.gov/grants/frequent_questions.htm
Summary of Helpful NIH Web Pages

Office of Extramural Research (OER) Web Page:
http://grants.nih.gov/grants/oer.htm

NIH Grants Policy Statement (Rev. 10/17):
http://grants.nih.gov/grants/policy/nihgps/

NIH Extramural Nexus – newsletter for the extramural community:
http://nexus.od.nih.gov/all/nexus-by-date/

Grant Application Basics:
http://grants.nih.gov/grants/grant_basics.htm

eRA Training: Video Tutorials
http://era.nih.gov/era_training/era_videos.cfm
Summary of Helpful NIH Web Pages

How to Apply - Application Guide:

Annotated SF424 (R&R) Application Forms (General and Small Business and Multi-project):

How we check for application completeness:

Do I have the right electronic forms for my NIH application?:

Self Help Resources page:
http://grants.nih.gov/support/index.html
Summary of Helpful NIH Web Pages

eRA Commons Web pages:
http://era.nih.gov/

eRA Commons User Guides:
http://era.nih.gov/commons/user_guide.cfm

Intellectual Property Policy:
http://grants.nih.gov/grants/intell-property.htm

Research Portfolio Online Reporting Tools (RePORT):
http://report.nih.gov

RePORT Expenditures & Results (RePORTER):
http://projectreporter.nih.gov/reporter.cfm
NIH OER Listservs

NIH Guide for Grants and Contracts:
Official publication for NIH Grant Policies, Guidelines & Funding Opportunities
http://grants.nih.gov/grants/guide/listserv.htm

Office for Human Research Protections (OHRP):
http://www.hhs.gov/ohrp

Office of Laboratory Animal Welfare (OLAW):
http://grants.nih.gov/grants/olaw/references/list.htm

eSubmission:
Separate listservs available for scientists and administrators
Grants Information: Who to Contact?

General Application Questions:
- E-Mail: GrantsInfo@nih.gov
- Phone: 301-435-0714

Grants.gov Customer Support:
- E-Mail: support@grants.gov
- Webpage: http://grants.gov/
- Phone: 1-800-518-4726

eRA Commons Helpdesk:
- Web: https://grants.nih.gov/support/index.html
- Toll-free: 1-866-504-9552
- Phone: 301-402-7469
- Hours: Mon-Fri, 7 a.m. to 8 p.m. Eastern Time
Grants Policy: Who to Contact?

Division of Grants Policy:
- E-Mail: GrantsPolicy@mail.nih.gov
- Phone: 301-435-0949

Division of Grants Compliance & Oversight:
- E-Mail: GrantsCompliance@mail.nih.gov
- Phone: 301-435-0949

Division of Extramural Inventions and Technology Resources:
- E-Mail: Inventions@nih.gov
- Phone: 301-435-1986