

After the Award is
Made... *THEN WHAT?*

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After the Award:
The Grants Management Perspective

Topics of Discussion


- Notice of Award
- Progress Report
 - SNAP (Streamlined Non-competing Award Process)
 - Categorical
- Financial Status Report
- Carryovers & Offsets
- Prior Approvals

Topics of Discussion (*continued*)

- Supplements
 - Competitive
 - Administrative
- Close Out
 - The process
- Questions

Notice of Award Letter

- What is in the Notice of Award Letter?
- What are the components of the Notice of Award Letter?
- Grantee Acceptance of the Notice of Award Letter
- Timeliness and Delays



What is in the Notice of Award Letter?

- Legally Binding Document
 - Identifies grantee, PI
 - Establishes funding level, support period
 - Sets forth terms and conditions
 - Includes NIH Contact Information for assigned Program Director & Grants Management Specialist
 - Sent to the business official (e-mailed)
 - Available in Commons Status

Components of the Notice of Award

NOA Section I:

- Award Data & Fiscal Information
 - Summary of totals for current and future years
 - Fiscal year of award
 - Indicates whether an unobligated balance has been applied to the award amount

NOA Section II:

- Grant Payment Information
- OIG Hotline Information



NOA SECTION II – PAYMENT/HOTLINE INFO.

- For Domestic Non-Federal Institutions:

Grant payments will be made available through the DHHS Payment Management System (PMS). PMS is administered by the Division of Payment Management, Program Support Center (PSC), DHHS, Office of the Deputy Assistant Secretary, Finance, which will forward instructions for obtaining payments. Requests for downloadable forms and inquiries regarding payment should be directed to:

Division of Payment Management

P.O. Box 6021


Rockville, MD 20852

Telephone Number: (301) 443-1660

NOA SECTION II – HOTLINE INFO. *(continued)*

- The HHS Inspector General maintains a toll-free hotline for receiving information concerning fraud, waste, or abuse under grants and cooperative agreements. Such reports are kept confidential and callers may decline to give their names if they choose to remain anonymous:

Office of Inspector General
Department of Health and Human Services
330 Independence Avenue, SW
Washington, DC 20201
(1-800-447-8477 or 1-800-HHS-TIPS)



What is in the Notice of Award? *(continued)*


NOA Section III: Standard Terms & Conditions

- Grant program legislation and regulations
- Restrictions on the expenditure of funds in appropriation acts
- 45 CFR 74 or 92 as applicable
- NIH Grants Policy Statement
- Carryover—automatic or prior approval
- Included/excluded from Streamlined Noncompeting Award Process (SNAP)
- FDP Institutions noted
- Program Income



NOA - Special Terms & Conditions

- **NOA Section IV: Specific Terms and Conditions**
 - Revisions
 - Cooperative Agreement
 - Restrictive terms
 - Information items
 - Staff Contact Information
 - Spreadsheet Summary



Grantee Acceptance

- The grantee indicates acceptance of the terms and conditions of the award by **drawing down funds** from the Payment Management System

Progress Reports

- NIH eRA - “The COMMONS”
- Elements of a Progress Report
 - Streamlined Noncompeting Award Process (SNAP)
 - Categorical
- Timeliness
- Administrative and Fiscal Contents

eRA Commons

- Commons-registered institutions and PIs:
 - Have access to due date information through the Commons Status system (electronic submission for SNAP)
 - Have access to pre-populated face pages via Status
 - eRA Commons Website:
<https://commons.era.nih.gov/commons/index.jsp>

Key Elements of the Progress Report

- Budget Information
- Specific Aims as funded
- Studies and results
- Significance
- Plans
- Inclusion Enrollment Report Table (clinical)
- Publications
- Key Personnel Report

SNAP Administrative & Fiscal Requirements

- PHS 2590
- Detailed budgets not required
- Financial Status Reports due at end of competitive segment
- Automatic carryover
- **THREE RESPONSES:**



SNAP Administrative & Fiscal Requirements *(continued)*

1. Provide complete other support or any changes in active support of the PI and key personnel
2. Describe any significant, (> 25%) change in the level of effort of key personnel named in the Notice of Award
3. Explain why there is a balance, (including prior year carryovers), > 25% of the current year's total budget and how you plan to use the funds



Categorical Progress Reports - Administrative and Fiscal Contents

- Submit complete non-competing continuation application (PHS 2590)
 - Detailed budget, justification, and updated other support, IRB and IACUC if appropriate
 - Address unobligated balance > 25%
- Total Costs as commitment base
- Annual Financial Status Reports (Electronic Submission)



Categorical Progress Reports - Administrative and Fiscal Contents *(continued)*

- Face Page
 - Correct contact information
 - Human Subjects/Animals
 - FWAs/Assurances
 - IRB/IACUC dates
 - Education Certification for new personnel
- Budget Page
 - AT COMMITTED LEVEL
 - Written justification
 - Updated Other Support (calendar months expended!!)
 - Checklist Page

Where to Send the PHS 2590

- All Non-Competing Grant Progress Reports due on/after Oct. 1, 2004 are to be sent to:

Division of Extramural Activities Support, OER,
NIH

6705 Rockledge Drive, Room 2207, MSC 7987

Bethesda, M.D. 20892-7987


Bethesda, M.D. 20817 (courier/express)

Telephone: (301) 594-6584



What Not to Submit with the Non-Competing Progress Reports

- Carryover Requests
 - Requests for Supplemental Funding
 - Requests for Additional Time to the Final Budget and Project Period
- * These are administrative actions that need to be addressed separately.



What Can Delay the Award Process?

- Lack of or Slow Response to Inquiries
- Info sent without Identification—always include grant number
- Missing counter-signature of an authorized business official
- Budgets with Inadequate Justification
- Other Support for an Individual that adds to more than 100%

What Can Delay the Award Process?

- Missing information for Key Personnel
- Out-of-date IRB/IACUC approvals
- Lack of population data for clinical trials
- New Fiscal Year Federal Budget:
Continuing Resolution

Timeliness

- All grantees have access to a searchable list of due progress reports at:
http://era.nih.gov/userreports/pr_due.cfm
- Two separate progress report reminders e-mailed to the PI
 - Two months prior to the due date
 - Two weeks after the due date for overdue reports
- NIH Guide, August 5, 2003:
<http://grants1.nih.gov/grants/guide/notice-files/NOT-OD-03-054.html>

In Summary...

- Annual progress report is due two months prior to anniversary date
- Use the PHS2590 instructions and form pages found at:
<http://grants.nih.gov/grants/funding/2590/2590.htm>
- Non-SNAP processes are detailed in the instructions

Financial Status Reports

- Due 90 days after the end of EACH budget period
- Reflect funds that were expended in a budget period
- **MUST BE SUBMITTED BEFORE CARRYOVER REQUESTS ARE CONSIDERED**
- Grant will not be processed if FSR has not submitted AND accepted in to the system

Carryover/Offset – What's the Difference?

- One increases the approved budget and the other...
- Decreases the current fiscal year's dollars by “partially paying” the current year's grant with funds from a prior year

Carryover/Offset

- **FIRST: YOU MUST HAVE AN UNOBLIGATED BALANCE**
- **Unobligated Balance:**
 - Definition: Amount indicated on the Financial Status Report (FSR) that represents funds the grantee institution was awarded but has not obligated (spent). The amount listed as “unobligated funds” on the FSR should include any funds that remain restricted from use in prior years/budget periods. This is a cumulative amount and should never decrease unless there has been a carry over or partial payment (offset).

Carryover

- Definition: Unobligated funds that are carried forward from one fiscal year or budget period to another. This action requires a letter from the grantee, (countersigned by the institution's authorized business official), requesting/justifying the carry-forward and must include a detailed budget page and budget justification. The budget page should reflect both Direct costs and F&A costs. The **approved budget is increased** on the NGA allowing the grantee to spend funds carried forward from the previous fiscal year/budget period. The Total Federal Award Amount remains **unchanged**, (must reflect \$0), since funds are carried forward from a previous fiscal year as opposed to adding additional funds, (new \$\$).



Offset

- Unobligated funds used to “partially pay” the current fiscal year budget period. When a grant is offset the Approved Budget **DOES NOT** increase or decrease but the Total Federal Award Amount **DECREASES** the current fiscal year’s dollars indicating that the Approved Budget will be ‘partially paid’ with funds from prior fiscal year. Once a grant is offset – those funds are no longer available for use by the grantee and the funds are returned to the ‘general NICHD funding pool’.



Prior Approval

- Certain post-award actions require the prior approval of the NIH Grants Management Officer
- NIH Grants Policy Statement, Prior Approval Section:
http://grants1.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part7.htm

Prior Approval

- Examples of actions requiring NIH Prior Approval:
 - No-Cost Extensions beyond first extension
 - Change in Principal Investigator
 - Change of Grantee Institution
 - PreAward costs more than 90 days (competing grant)
 - Addition of a foreign component

Prior Approval

Prior Approval Examples Continued:

- Carryover of restricted funds
- Undertaking activities disapproved or restricted as a term of award
- Change in Scope or Research Objectives



Prior Approval

- Change in Scope:
 - Grantee makes initial determination of significance of a change, consulting the grants management specialist as needed.
 - The following items **may** indicate a change in scope:
 - **Change in aims**
 - **Significant rebudgeting (deviation between categories of more than 25% of total awarded costs)**
 - **Change in use of animals or humans**
 - **Significant change in key personnel**
 - **Shift in research emphasis**
 - **Application of new technology**

Refer to NIH Grants Policy Statement for further information.

Prior Approval

- Change in Status: (including absence of PI)
 - Grantee must notify NIH if the PI will:
 - Reduce his/her time by more than 25% of approved effort at time of award
 - Withdraw from the project
 - Be absent for more than 3 months

Prior Approval

- **Change in Status** (including absence of PI):
 - Prior approval must be from NIH for the replacement of the PI
 - Request should include:
 - Justification for the change
 - Biographical sketch of the individual proposed
 - Other sources of support
 - Budget Changes resulting from the change
 - Human Subject Education Certification (if applicable)

Prior Approval

- All requests for prior approval must be:
 - Submitted in writing or via email – include complete grant number, PI name and contact information, grantee name
 - Submitted to the awarding IC's Grants Management Specialist no later than 30 days before the proposed change
 - Signed by the PI and administrative official
 - Only responses to prior approval requests signed by the GMO are valid

Competitive Supplements

- Are only to support a change in scope of the research
- Are received 3 times a year and are reviewed by both a study section and council
- Funding may or may not be the same as regular grants

Administrative Supplements

- Definition: Additional funds that are requested to enhance the scope of the research within the grant; these funds are above and beyond the approved committed level of funding
- Must be submitted with a complete and detailed budget and a written justification
- Requires Prior Approval

Reminder

CLOSEOUT: Final Reports

Failure to submit timely and accurate closeout reports may affect future funding!

- **Final Financial Status Report (FSR)**
- **Final Invention Statement and Certification**
- **Final Progress Report**

**90-day requirement is a term and condition
of all
NIH grant awards!**

After the Award:
A Program Perspective

Post-Award Issues and Actions

- ▶ Delay of First Year Award
- ▶ Annual Progress Report
- ▶ Delays of Non-Competing Continuation Award
- ▶ Actions Requiring Prior Approval
- ▶ Administrative Supplements
- ▶ Grant Termination

Delay of the First Year Award

- **Lack of Just-in-Time Information**
- **IRG Comments and Recommendations**
 - IRG recommends design changes or a reduction of scientific scope, budget, or time
 - Human subjects or animal welfare concerns
 - NIH requests a response to an administrative note
- **Data Safety Monitoring Plan requires NIH approval**
- **Lack of Data Sharing or Model Organism Sharing Plan**
- **Renegotiations of specific aims in response to NIH administrative reductions**
- **Foreign component needs State Department clearance**



Annual Progress Report

Due

- ◆ 60 days prior to budget period start date
- ◆ 45 days prior for eSNAP

Submit

Preferred via NIH eRA Commons

<https://commons.era.nih.gov/commons/index.jsp>

or to

Centralized NIH Receipt Point

see NIH Guide Notice [NOT-OD-04-063]

<http://grants2.nih.gov/grants/guide/notice-files/NOT-OD-04-063.html>

How NIH staff may use information from the progress report?

- Monitor developments of a specific project
- Monitor evolution of a specific field
- Highlight and publicize important research progress
- Brief the Institute Director
- Prepare reports for Congress
- Respond to inquiries

We keep unpublished information confidential until the day of publication and honor embargoes on journal articles.

Annual Progress Report

A clear and concise presentation of major highlights and/or problems encountered and possible resolutions

- Summary of accomplishments
 - Specific aims – as funded
 - Results – during reporting period
 - Significance
 - Plans for next budget period
- List of publications generated by project
- Explain any changes in Human Subjects or Vertebrate Animal Research
- Report on gender and minority inclusion
 - Inclusion Enrollment Report

Grant Checklist for the Program Director

Program Signoff Notes

1. Is progress satisfactory? (If no, explain.) [Add Comment](#)
2. Is there a change in the scope, goals, or objectives of the project?
3. If yes, does this change benefit the project and is it approved? (If not, explain.)
4. Is there a change in key personnel or their level of effort? (If yes, describe.)
5. If there are changes/concerns in the Multiple PI leadership plan, is the new plan acceptable?
6. Is there evidence of scientific overlap? (If yes, explain.)
-
13. If a progress report for a supplement is required, is progress reported and acceptable?
14. Are there other issues that should be resolved prior to issuing an award? (If yes, provide details.)
15. If any issues have not been resolved, should a restricted award be made?

Delay of Non-Competing Continuation Award

- Late submission of application
- Little or no progress with no discussion of problems and potential solutions
- Changes in Scope not approved in advance
- Inclusion Enrollment Report missing

Contact your program officer early.

Actions Requiring Prior Approval

Change in Scope

- Significant change in aims, methodology, approach, or other aspects of project objectives
- Reflects significant change from the project as reviewed and approved

Examples:

- Change in **specific aims**
- Change to a **different animal** model
- Any change from the **approved use of animals or human subjects**
- Shift of research emphasis to a **different disease area**

Final approval of a change in scope requires concurrence of the NIH Program Officer and Grants Management Specialist.

Actions Requiring Prior Approval

Change of Grantee Institution

Program Officer assesses

- Progress to date
- Adequacy of new resources and environment
- Availability of expertise (key personnel)
- Potential problems (e.g., equipment)

Contact NIH Program and Grants Management Staff early!



Actions Requiring Prior Approval

Change in Status of PI

- Change of PI
- $\geq 25\%$ change in PI effort
- PI absence of 90 days or more

Note: A project cannot be converted from a single PI to a Multiple PI project during a non-competing phase.

Types of Administrative Supplements

- Increase diversity in researcher community
- Cover unanticipated expenses of work within scope of grant
- Maintain lab or team during funding hiatus during competing continuation phase
- Closeout of grant

Supplements to Promote Diversity

- ▶ Research Supplements to Promote **Diversity** in Health-Related Research (PA-05-015)
 - Individuals from underrepresented racial and ethnic groups
 - Individuals with disabilities
 - Individuals with disadvantaged backgrounds
- ▶ Supplements to Promote **Reentry** into Biomedical or Behavioral Research Careers (PA-04-126)
 - Individuals with high potential to reenter research after taking time off to care for children or attend to other family responsibilities

Supplements: Unanticipated Expenses of Work Within Scope of Grant

- Catastrophes or natural disasters
- Critical equipment breakdowns
- Loss of source for critical reagents

Generally one-time supplement

- **Cannot be used for changes in scope.**
- **Not intended to cover inflationary increases in supplies, animal care, etc.**

Supplements: Bridge or Interim Funding

2008 NIH Director's Bridge Awards

<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-08-037.html>

Interim Funding (Institute specific)

- High likelihood that amended application will improve enough to be funded
- Avoid disruption caused by loss of personnel or scientific momentum
- Maintain a unique or critical resource

Supplements: Closeout of Grant

VERY RARE!

- Finish work that would be of clear benefit to NIH and research community
- R01 Clinical Trials where termination without completion of studies is particularly undesirable

Quick quiz

The PI's recent productivity is down. The PI does not feel ready to apply for a competing continuation R01 award. The PI needs more time to complete and publish new manuscripts (*at least 9 months*).

What are the option(s)?



No Cost Extension:

- Grantee may extend at the end of the project period *up to 12 months* without prior approval
- Notify NIH
 - 10 days prior to the expiration date of the project period
 - Up to the last day of the budget period if submitting via the Commons

See NIH GPS Summary of Expanded Authorities

http://grants2.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part7.htm

Grant Termination

Early Termination

PI leaves research project without qualified and willing replacement

PI changes research direction or takes on new projects

After Termination

Grantee legally bound to submit

- Final Financial Status Report
- Final Invention Statement and Certification
- Final Progress Report

Failure to submit timely final reports may affect future funding

RESOURCE WEB LINKS

- Office of Extramural Research Grants Home Page:
<http://grants.nih.gov/grants/oer.htm>
- NIH Grants Policy Statement (12/03):
http://grants.nih.gov/grants/policy/nihgps_2003/index.htm
- NIH Guide: <http://grants.nih.gov/grants/guide/index.html>
- PHS 398 Application (form pgs are PDF-fillable):
<http://grants1.nih.gov/grants/funding/phs398/phs398.html>
- PHS2590 Progress Report (form pgs are PDF-fillable):
<http://grants.nih.gov/grants/funding/2590/2590.htm>
- Handy Reference: Activity Code, Organization Codes and Definitions Used In Extramural Programs:
<http://grants.nih.gov/grants/funding/ac.pdf>

Questions??