Post-Award Administration
An Overview for New Investigators

Dawn Mitchum
Supervisory Team Leader
Office of Grants Administration
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Topics to Discuss:

- The Notice of Award (NoA)
- Annual Reporting
- Post Award Issues - Unobligated Balances, Problems with the Research
- Prior Approvals - Recipient Authorities, the Rules, the Requirements, Examples
- Closeout
- Resources
- Final Reminders & Things to Consider
The NIH Grant Application Cycle

- Investigator Initiates Research Idea
- Inst. Submits Application to NIH
- Allocates Funds (NoA)
  - Grant Management Specialist
- Center for Scientific Review
  - Assign to SS
  - Assign to Institute
- Study Section: Scientific Review Officer
  - Review for Scientific Merit
- Institute: Program Director
  - Programmatic Evaluation
- Advisory Councils and Boards
  - 2nd Level Review
  - Recommendations
- Institute Director
  - Approves Funding

Conducts Research
The Notice of Award (NoA)

What is It?
The Notice of Award (NoA):

- Electronically available to recipient
- Legally binding document
- Identifies grant number, recipient organization, PD/PI
- Establishes period of approved support
- Sets forth terms and conditions
  - accept these by drawing down funds from the Payment Management System
- Includes awarding agency contact info – Grants and Program
The NoA, continued:

- Establishes funding levels
  - Initial year is obligated via the Notice of Award
  - Future year amounts are commitments & subject to change, pending FY funding policy
- Funds are made available via the Payment Management System
- All restricted funds must be tracked separately
- Recipients are responsible for connecting all expenses to the award

- Your institution’s Sponsored Projects staff will help you with this!
Annual Reporting:
Research Performance Progress Report (RPPR)

What’s Due? When?
The NIH Research Performance Progress Report (RPPR) Cycle

Inst. Submits RPPR to NIH

DCB: Program Director - Programmatic Review
OGA: Grants Mgmt. Specialist - Administrative Review

Conducts Research, Presents results, Publishes results

Notice of Award for next budget period
Annual Reporting:

• **Annual reports are required to be submitted using the Research Performance Progress Report (RPPR) module in eRA Commons**
  • Required for all awards
  • No updated IRB or IACUC approvals needed during RPPR submission
  • RPPR Questions: Change in Other Support? Change in effort for key personnel? Unobligated balance greater than 25%?
  • Ensure all programmatic requirements are accounted for (as appropriate)
Annual Reporting, continued:

- Streamlined Non-Competing Award Process (SNAP) RPPRs (ex. virtually all R-series grants)
  - Due no later than 45 days prior to the listed start date
- Non-SNAP RPPRs (ex. U01, P01, etc.)
  - Due no later than 60 days prior to listed start date
  - Requires detailed budget
  - Annual Federal Financial Report
- Multi-Year Funded (MYF) RPPRs (ex. DP2s)
  - Due on or before the anniversary of the budget/project start date
    - See terms and conditions of award for specific due date
  - Does not receive a Notice of Award each year
Post-Award Issues

What are they? What can be done?
Unobligated Balances:

- Does the award have “carryover authority”? (listed on NoA)
  - Generally, R series will have automatic carryover
  - Generally, U01s will not have automatic carryover
  - Carryover authority is not applicable to DP2s
- Bona Fide Need Rule
  - Can the awarding agency expect all available and next year’s funds to be spent in the listed time period?
- Provide an accurate estimate of the balance and assessment of the project
- Explain what may have occurred and what is planned
Unobligated Balances, continued:

- Tips in working with NIH on situations regarding the balance:
  - Balances typical equate to slow progress – be forthcoming
  - Submit timely reports (FFRs) and information
  - Discuss options proactively – there are a lot of different options!

- WE ARE NOT LOOKING TO TAKE THE $ - we are looking to do what is in the best interest for all parties!
Problems with the Research?

• Scientific and therefore budget delays do occur
  • Research is starting slower than expected
  • Issues with hiring personnel
  • Trouble with obtaining necessary approvals
  • Enrollment is lower than anticipated
• Engage with your Grants Management and Program staff sooner than later
  • Will greatly aid in future conversations and considerations
Prior Approval

Needed or Not?
Recipient Authorities:

Standard terms and conditions of award give many authorities to the recipient (i.e. no need for prior approval). This includes (in general):

- **Carryover of unobligated balances** – unless stated otherwise on the award
- **Cost-related changes/rebudgeting** – unless change in scope
- **Extension of project period without additional funds** (up to 12 months) – except DP2
- **Transfer of work to a 3rd party** – unless change in scope or foreign entity

Any authority listed in policy can be overridden by any special term on the award and/or specifics listed in the Funding Opportunity Announcement (FOA)
The Rules:

- The following items do require prior approval, provided by OGA:
  - Addition of a foreign component
  - Pre-award costs more than 90 days of a competing award
  - Change in scope
  - Deviation from award terms and conditions
  - Change in the PI or other key personnel identified in the award
  - Change in recipient organization (i.e. transfer)
  - Extension for more than 12 months
  - Need of additional funding
The Requirements:

• All requests for prior approval must be:
  • Submitted in writing/e-mail letter – included complete grant number, PD/PI name and recipient name
  • Some can be submitted electronically via Prior Approval Module
  • Must be submitted by the Authorized Organization Representative for the recipient
  • Submit the request approximately 30 days prior to change
  • Send the request to the grant’s Grants Management Specialist and Program Official
  • Detail the specific need with appropriate justification (scientific and budget, as appropriate)
Prior Approval
Some Examples
Key Personnel:

- Change in the PI or key person’s status
  - NIH definition of key person – PI or PIs (if multiple) and any person named on the award
  - Any change in effort greater 25% from approval level
  - Replacement or absence greater than three continuous months
  - All others do not need NIH’s prior approval
  - Be sure to detail any scientific and budgetary impact in the request
  - Include biosketch and other support
  - If multi-PI, address the leadership plan
Change of Recipient Organization:

• Award belongs to the recipient and must be relinquished
• Need to submit a change of recipient organization application
• Address any impact to the award because of the change
• Issues that are typically encountered:
  • Late notice of a PI leaving (ex. find out in the RPPR)
  • Late submission of the relinquishing and/or transfer application
  • An associated change in scope of the project
  • Multi-PI situation where the contact PI is moving
  • The proposed new recipient organization will not be substantially involved in the project
Change in Scope:

- Recipient makes the initial determination on significance of change
- Consult with NIH as needed
- The following may indicate a change in scope:
  - Significant rebudgeting of more than 25% of total award
  - Change in use of animals or human subjects research
  - Significant change in key personnel
  - Shift in research emphasis
  - Application of new technology
Closeout

It’s Serious Business!
Closeout:

- Process by which NIH determines that all applicable administrative actions and all required work of an award have been completed by the recipient and NIH.
- All applicable reports are due no later than 120 days after the project end date – See Project Period End Date on Notice of Award
  - Final Federal Financial Report
  - Final Research Performance Progress Report
  - Final Invention Statement and Certification
- Delinquent Reporting may result in Unilateral Closeout
Available Resources

A very small sampling...
Resources:

  - Instructions & Forms Library
  - NIH Grants Policy Statement
  - NIH Guide for Grants & Contracts (FOAs, Policy Notices, etc.)
  - Policies and Processes
  - Grant Funding Information (FOAs, Funding Strategy, etc.)
  - Policy Changes & Guide Notices
  - Reporting Noncompliance
Resources, continued:

- Clinical Trial Requirements for Grants and Contracts - https://grants.nih.gov/policy/clinical-trials.htm
  - Policies & Changes
  - Clinicaltrials.gov Registration & Reporting
  - Regulations, Policies & Guidance
  - Human Subjects Protections Training
  - When & How to Comply
  - Managing Papers & Reporting to NIH
Final Reminders & Things to Consider

*Please, Don’t Forget!*
Things to Remember:

• Submit timely reports and applications – be sure to follow the instructions!
• Stay on top of the associated requirements (ex. Public Access and Financial Conflict of Interest)
• Make sure to know your organization's policies and procedures
• Have conversations at the appropriate time with Program about your continuation
• Prepare for closeout for any projects that are ending
  • Close-out is serious business – see NIH guidance