



Recovery Act News



Recovery and Accountability

- The opportunity afforded by the ARRA also carries enhanced accountability and transparency.
 - Grantees must fulfill detailed quarterly budget reporting requirements, consistent with section 1512(c) of the ARRA.
 - Reports will summarize total amount of ARRA funds received that quarter and how those funds were expended.
 - This includes a detailed list of all projects or activities and an estimate of the number of jobs created or retained through those projects and activities.
- *OMB Posted Data Elements for Comment FR 4/1/09*
<http://edocket.access.gpo.gov/2009/pdf/E9-7317.pdf>
- Reports will be entered at www.FederalReporting.gov (*under construction*) and will be publicly available at www.recovery.gov
- Details still being addressed by OMB. – **Stay Tuned!!**



Special ARRA Terms and Administrative Requirements

- In addition to the standard NIH terms of award, all NIH ARRA awards will include special ARRA terms
 - http://grants.nih.gov/grants/policy/NIH_HHS_ARRA_Award_Terms.pdf
 - Updates will be posted at this same site as necessary.
- ARRA requires recipients to account for, track, monitor, report on, provide for audit of, and closeout ARRA funding separately from non-ARRA awards
 - To implement these requirements NIH has established a number of unique business processes
 - Guide Notice NOT-OD-09-080 Issued April 3, 2009 describing ARRA features.



Accessing ARRA \$\$\$ in the Payment Management System (PMS)

- PMS has established unique “P” accounts for all grantees receiving ARRA funds.
 - No cash pooling. Grantees will be required to request advances individually from each ARRA-funded grant
 - Existing PMS users will be able to access the “P” accounts using already established login & password
- PMS required all HHS agencies to adopt a unique Document Number Schema for ARRA awards
 - Core schema traditionally used will remain intact; except the last character will be “Z”
 - Example: Grant Number= 1 R01 AI123456-01; ARRA Doc # = RAI123456Z



Unique Business Processes: Administrative Supplements & Competing Revisions

- These present a unique challenge—accommodating the “separation” and accountability required by ARRA while still requiring a programmatic connection to the parent grant
 - ARRA T-3 budget/projects periods will reflect that of the T-3 only and not the parent
 - ARRA T-3s issued in FY2009 may be for a single budget/project period up to 24 months.
 - ARRA T-3s issued in FY2010 will be no more than a 12-month budget/project period
- No-cost Extensions of ARRA-funded T-3s
 - ARRA T-3s are awarded under NIH Terms of Award and will therefore be eligible for a one-time no-cost extension
 - This is separate from the parent record



Unique Business Processes: Administrative Supplements & Competing Revisions

- No “co-mingling” of ARRA T-3 and parent grant \$\$\$ allowed (assuming parent grant funded with regular appropriation \$\$\$)
 - Separate institution accounts and PMS drawdowns required
 - No rebudgeting between parent and ARRA T-3
 - No carryover of ARRA T-3 balances into the parent
 - If an ARRA award includes a commitment for an ARRA-funded future year in FY2010, grantees will be able to carryover from the FY2009 budget period into FY2010.
 - No carryover allowed between ARRA funding budget periods and budget periods funded by non-ARRA fund
- Separate Financial & Closeout Reports Required



ARRA Grant Compliance

- The applicant organization certifies in the grant application that it is obligated to comply with the terms and conditions of any resulting grant award
- Acceptance of a grant award is signified by drawdown of funds which then obligates the grantee to comply with all standard and special terms and conditions of award (e.g., based on statute, regulation, policy, program requirement)
- Failure to comply may cause NIH to take one or more enforcement actions, depending on the severity and duration of the non-compliance.
 - Enforcement actions may include special conditions, closer monitoring, withholding of support, recovery of funds, suspension, or termination



FY 2009 NIH Salary Cap

Effective January 1, 2009, salary and wages on NIH grants limited to an annual rate of \$196,700 (equal to Executive Level I).

- An individual's base salary is NOT constrained by the legislative provision for a limitation of salary. An institution may pay an individual's salary amount in excess of the salary cap with non-federal funds.
- Grantees should provide information on full salary needs (if more than the cap) so NIH can adjust based on future limits.
- Salary Cap Summary (Historical Information):
http://grants.nih.gov/grants/policy/salcap_summary.htm

More at: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-09-069.html>



FY 2009 OIG Audit Work Plan

Selected Highlights

- Colleges' and Universities' Compliance with Cost Principles
 - Cost transfers, effort reporting, and other areas
- Use of Data and Safety Monitoring Boards in Clinical Trials
- NIH Monitoring of Extramural Conflicts of Interest
 - How NIH monitors extramural grantees' FCOI and the effectiveness of NIH's oversight
- Grantee Management of Financial Conflicts of Interest in Research Funded by the NIH
 - Monitoring of FCOIs, nature of FCOIs, and how FCOIs are managed (for FCOIs reported to NIH in FY 2006)



Audit Requirements

All NIH Grantees that expend \$500,000 or more within a year in Federal awards are subject to an audit requirement.

- Audits are due within the earlier of 30 days after receipt of the auditor's report(s) or 9 months after the end of the grantee's audit period.
- Grantees delinquent in submitting audits risk the imposition of sanctions and potential loss of Federal funds.



Closeout Final Reports

*Grantees are **strongly encouraged** to submit closeout documents electronically through the eRA Commons!*

- Documents are due within 90 days of project period end date
 - Final Financial Status Report (now required electronically)
 - Final Inventions Statement & Certification
 - Final Progress Report
- Failure to submit timely reports may affect future funding to the organization!





NIH Centralized Processing Center

- NIH encourages electronic submission of closeout documents through the eRA Commons.
- Centralized office accepts receipt of all non-financial, paper-based closeout documents
 - Final Progress Report
 - Final Invention Statement and Certification
- Mail to the Central NIH unit at:
 - NIH Centralized Processing Center
 - 6705 Rockledge Drive, Room 2207, MSC 7987
 - Bethesda, MD 20892-7987 (for regular or US Postal Service Express mail)
 - Bethesda, MD 20817 (for other courier/express mail delivery only)



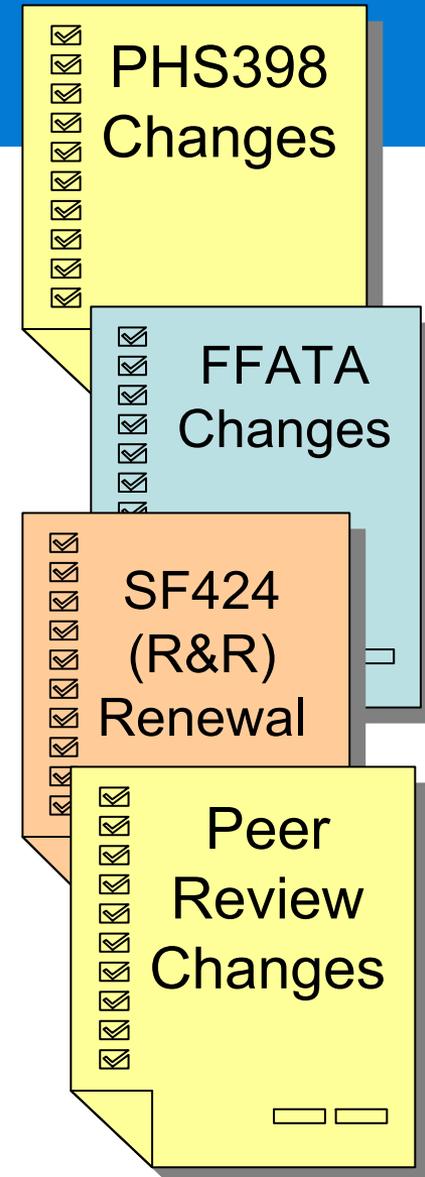
Electronic Submission: *Update*

- Adobe-based grant application forms are now available for all FOAs requiring electronic submission.
- Career Development Awards (Ks) transitioned to electronic submission.
- Next set of transitions:
 - New PHS 398 and SF 424 (R&R) Application forms expected in Fall, 2009.
 - Transition of F, T, and complex mechanisms.



Sample Changes to Application Forms

- R&R Senior/Key Person Profile
 - Added Degree Type and Year (*note this will allow NIH to remove Degree fields from PHS 398 Cover Pg Supplement*)
- R&R Project/Performance Site Location(s)
 - Moved Congressional District data from R&R Cover Component
 - Added DUNS Number field
- R&R Other Project Information
 - Re-ordered and revised Human Subjects fields
 - Revised fields on Environmental Impact
 - Added field for impact on Historical Places
- PHS 398 Checklist
 - Added Disclosure Permission Statement
- PHS 398 Research Plan
 - Alignment with enhanced peer review criteria and shortening of the application.

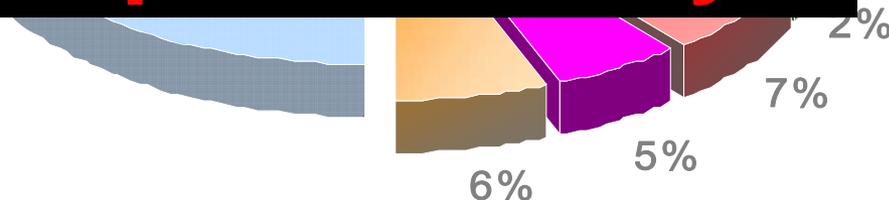




Future Transitions to Electronic Submission with Adobe Forms

- Fellowship (F): August 8, 2009 (Tentative)
- Training (T): September 25, 2009
- Complex

Timeline is subject to change due to Grants.gov form development delays





Profile Maintenance

- PIs have an obligation to keep information in their Personal Profile current and need to update it regularly
- Profile data used in other electronic processes (e.g., Summary Statements, eNotifications)
 - Degrees
 - Position Titles
 - Addresses - e-mail & postal
- Especially critical for researchers applying for early-stage and new investigator status.





Thank You!

Any Questions?