



NIEHS

**National Institute of
Environmental Health Sciences**

GRANTS MANAGEMENT

BUSINESS BREAKOUT SESSION

October 25, 2010

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WORKER EDUCATION AND TRAINING PROGRAM



- ROLES AND RESPONSIBILITIES
- EXPANDED AUTHORITIES
- PRIOR APPROVAL REQUIREMENTS
- CARRYOVER REQUIREMENTS
- PROGRESS REPORT SUBMISSION
- GENERAL CORRESPONDENCE

Roles and Responsibilities

- Program Official
- Grants Management
- Business Official and/or Authorized Organization Official
- Principal Investigator

- Program Official
 - Awarding institution counterpart to the PI
 - PO will provide technical assistance to the awardees through arrangement of technical workshops related technical issues that affect the program.
 - PO will ensure close coordination among awardees, other state and federal governmental agencies, and other training providers

- Grants Management

- Assures compliance with Federal laws and NIH policies and procedures
- Analyzes grant applications prior to award, including Type 5 noncompeting grant applications
- Reviews and responds to grantee prior approval requests and inquiries
- Is responsible for issuing the NoA

- Business Official or Authorized Organization Official
 - Designated by grantee institution
 - Grantee counterpart to the NIEHS Grants Management Specialist (GMS)
 - Responsible for administrative and fiscal monitoring of the grant
 - Assures compliance with Federal laws and regulations, and NIH policies and procedures
 - Corresponds directly with the NIEHS GMS

- Principal Investigator
 - Designated by grantee institution
 - Responsible for technical aspects of proposal
 - Assures compliance with Federal laws and regulations, and NIH policies and procedures
 - Assures programmatic compliance and maintains contact with Program Administrator
 - Corresponds with Institution Business Official prior to contact with NIEHS GMS

Expanded Authorities:

- Cost-related prior approvals

- NIH prior approval is not required to rebudget funds for any direct cost item that the applicable cost principles identify as requiring the Federal awarding agency's prior approval, unless the incurrence of costs is associated with or is considered to be a change in scope.

This is rebudgeting within the approved budget of other than restricted funds and not a change in scope

- Transfer of the Performance of Substantive Programmatic Work to a 3rd Party by Means of a Consortium Agreement—Change in Scope potential

- U45 Consortium dollar restrictions

- Need Prior Approval to Rebudget funds out of Consortium Line Item

- Rebudgeting between programs require prior approval (NOTE: Funds awarded for MWT cannot be rebudgeted into any other program.)

- Prior Approval Actions
 - Alteration and Renovation (A&R)
 - Capital Expenditures
 - Change in Scope
 - Change in Key Personnel
 - Change of Grantee Organization
 - Change in Grantee Organizational Status
 - Addition of a Foreign Component
 - Deviation from Award Terms and Conditions
 - Carryover of Unobligated Balances
 - Need for Additional NIH Funding

- A&R
 - Significant Rebudgeting or Change in Scope
- Capital Expenditures (land, construction or building acquisition)
 - All Instances
- Change in Scope
 - Change in methodology, approach, or other aspects of the project may be okay; however a change in direction, type of training, or other areas constitute a significant change from the aims, objectives, or purposes of training

- Change in Key Personnel
 - Required to notify the GMO in writing if the PI or Key personnel specifically named in NGA will withdraw from the project entirely, be absent from the project during any continuous period of 3 months or more, or reduce effort a rate of 25% or more.
- Change of Grantee Organization
 - Transfer of the legal and administrative responsibility for the project from one legal entity to another within a project period

- Change in Grantee Organizational Status
 - Advance notice of a Merger, Successor-in-Interest, or Name Change required to ensure that the organization is still able to meet legal and administrative obligations
- Addition of a Foreign Component
 - As stated in the RFA, Foreign organizations and foreign institutions **are not eligible to participate in this program.**

- Deviation from Award Terms and Conditions including Restrictions on the NGA
 - Prior approval required for any deviation from terms or conditions stated or referenced in the NGA. This includes undertaking any activities disapproved or restricted as a condition of the award
- Need for Additional NIH Funding
 - Requests within the scope may not be required to go through the competitive process--at the discretion of the program or funding source
 - Other requests for supplemental funding are considered to change the scope and may be required to compete for funding

Requests for Prior Approval

- Requests must be made in writing to the GMO no later than 30 days prior to the proposed change.
- Signed by and/or emailed by the AOO (Authorizing Organizational Official)
- Include the grant number and the name of the PI
- Justification of prior approval request

Note: PI signature is not required. Preference is to receive requests in pdf format via email.

- **Carryover of Unobligated Funds from a Prior Budget Period**
 - Carryover Request and Justification have been received
 - Table 1 (Sources of Funds)
 - Table 2 (Proposed Uses for Funds)
 - FSR/FFR** Applicable Due Dates:
 - HWWT – October 29th
 - DOE – November 30th
 - All Carryover Requests must be submitted no later February 15th of following year.

- Request must include a justification and a plan for the use of funds
- Grantees should allocate costs (personnel, equipment, consortia, F&A etc.) to the appropriate budget categories
- **NOTE:** If the dollar amount is significant (typically 25% of total current year costs), the grantee should provide a justification stating why the funds were not fully expended in the prior year
- Carryover cannot be completed until verification of the unobligated balance on the prior year FSR/FFR and review award actions subsequent to the FSR/FFR acceptance date

- Carryover requests will be reviewed by grants management and program.
- NIEHS staff will determine if the funds are available; if duplicate funding is already provided in the current year support; if there is program expansion, and if approval causes a recurring cost in the future years
- Upon recommendation, Grants Management Staff will issue the authorized Notice of Award.

– NIH Accepted FSR or FFR

**FFR (Federal Financial Report): The Federal Financial Report (FFR - SF425) is replacing the Financial Status Report (FSR - SF269). The deployment is scheduled for late February, 2011. A new tab in eRA Commons will allow grantee organizations to submit Federal Financial Reports (FFRs) electronically. Until the deployment notification by NIH, grantees are required to continue submitting the FSR.

- FFR (SF 425)
 - replaces the Cash Transaction Report (SF 272) and the Financial Status Reports (SF 269, SF 269A)
- PMS implementation of Federal cash data portion of FFR
 - effective 1/1/2010 (NIH Guide Notice NOT-OD-10-038)

Progress Report (Type 5) Guidance:

- The Annual Progress Reports (**PHS 2590**) are due 60 days (two months) prior to the end of the current budget period.
- Submit the completed, signed original progress report and one copy (with required signatures) to:

Division of Extramural Activities Support, OER
National Institutes of Health
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)

- Progress Report should include required pages for each project funded:
 - Estimated Unobligated Balance is required, regardless of the percentage, for each program
 - Budget Pages
 - Other Support is required for all Key Personnel listed on the NoA.
 - Biographical Sketch is required for all new personnel
 - All Personnel Report (NIH Guide Notices NOT-OD-09-139 and NOT-OD-09-140)
- **It is anticipated that the PHS 2590 will be replaced by the Research Performance Progress Report (RPPR). More information will be provided in the Spring Update.**

Project Effort

- Any PI/Co-PI effort that is reduced at a rate of more than 25% must request prior approval from NIEHS.
- It is anticipated that the PI will participate at an acceptable level of effort.

Other Support

- The other support must be included for all Key Personnel listed on the NoA on all funded projects.
- Total other support effort cannot exceed the allowable 12.00 person months.

All Personnel Report

- Always include PD/PI(s) - regardless of effort
- Other personnel who participated in project
- Effort of one person month or more
- Regardless of salary/unsalaried
- Regardless of affiliation
- Regardless of senior/key personnel status
- Current budget period (period now ending)

Requests and Inquiries

- Budgetary Requests or Inquiries should be submitted in writing to the Grants Management Specialist assigned to the project.
- Request should be submitted by or under signature of the Authorized Organization Official.
- Correspondence should always include: The grant number and PI name.

Audit Requirements

All NIH Grantees that expend \$500,000 or more within a year in Federal Awards are subject to A-133 audit requirement.

- Audits are due within 30 days after receipt of the auditor's report(s) or 9 months after the end of the grantee's fiscal year end.
- Grantees delinquent in submitting audits risk the imposition of sanctions and potential loss of Federal funds.
- NIH tracks receipt of A-133 Audits

Summary of Audit Requirements

Grantee Type	Source of Audit Requirement	Where to Submit Audit Reports
State & Local Governments	OMB Circular A-133	Federal Audit Clearinghouse 1201 E. 10 th Street Jeffersonville, IN 47132 Questions 1-800-253-0696
Colleges & Universities	OMB Circular A-133	
Non-Profits	OMB Circular A-133	
Hospitals	OMB Circular A-133	
For-Profits	45 CFR Part 74.26(d)	National External Audit Review Center HHS Office of Inspector General HHS Office of Audit Services 1100 Walnut Street, Suite 850 Kansas City, MO 64106-2197 Phone: 800-732-0679/816-426-7725
Foreign	NIH Grants Policy Statement (same as For-Profit)	(same as For-Profit)

NIH eRA COMMONS

Why register?

- Receive NoA electronically – **Note: this is the only transmission of the NoA**
- Check status of grant applications
- Allows for electronic submission of the FSR/FFR
- PI can view the Summary Statement
- One of the two required registrations needed to electronically submit the SF 424 R&R

Where to start?

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

This site has a direct link for registration

What is the NIH eRA Commons?

NIH has developed a system to facilitate the discrete exchange of essential information between NIH and applicant organizations. The “Commons” is a Web interface where NIH and the grantee community are able to conduct their extramural research administration business electronically.

NIH eRA Commons Registration: Who, What and How?

An institution must be registered in the NIH eRA Commons before faculty and staff can take advantage of electronic submission and retrieval of grant information. Only an individual with signatory authority for the institution in grant-related matters can register an institution.

To register in the NIH eRA Commons, open the [NIH eRA Commons homepage](https://commons.era.nih.gov/commons/) (https://commons.era.nih.gov/commons/) and click on the Grantee Organization Registration link. Follow the step-by-step instructions. The institution is registered when the information is completed, submitted (by pressing the Submit button) and confirmed by the NIH.

Having Problems with NIH eRA Commons?

Contact Information:

eRA Commons helpdesk available at:

<http://era.nih.gov>

Email: commons@od.nih.gov

Phone: 301-402-7469/866-504-9552 (Toll Free)

Final Note:

NIH Grants Policy Statement Revision - FY2011

- **Effective October 1, 2010, revision will supersede the December 2003 version**
 - **incorporates policy changes since 12/03, public policy changes, clarification of existing policies**
 - **Includes new chapters recommended by users (Career Awards, Multiple PD/PI), terminology changes as well as document enhancements.**
 - **Improves organization of existing chapters**
- **NIH Guide Notices announcing posting of new Grants Policy Statement**

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