Superfund Research Program

Best Practices for SRP Grantees

The following guidelines are intended for existing, awarded SRP grantees regarding best practices related to events or issues that may arise throughout the duration of a grant cycle. These guidelines are meant to complement, but not supersede, rules and guidelines emanating from the National Institutes of Health (NIH) and the U.S. Department of Health and Human Services (DHHS). Grantees are encouraged to refer to the NIH Grants Policy Statement (GPS) http://grants.nih.gov/grants/policy/policy.htm for further details.

The information contained in this document can be found on the "Materials for Grantees" webpage: http://www.niehs.nih.gov/research/supported/srp/resources/index.cfm. Please check to be sure you have the most up-to-date copy.

For specific issues, questions, and discussion, please contact your assigned program administrator listed in the "NIEHS Staff Contacts" on this page.

NIEHS Staff Contacts

Program Administrators:
Danielle Carlin, Ph.D., DABT
Phone: (919) 541-1409
E-mail: danielle.carlin@nih.gov
P42, R25 Grants

Michelle Heacock, Ph.D.
Phone: (919) 541-7824
E-mail: HeacockM@niehs.nih.gov
P42 Grants

Heather Henry, Ph.D.
Phone: (919) 541-5330
E-mail: henryh@niehs.nih.gov
P42, R01, R13, SBIR/STTR Grants

Grants Management Officers:
Lisa Archer Edwards
Phone: (919) 541-0751
E-mail: archer@niehs.nih.gov
P42, SBIR/STTR Grants

Bryann Benton
Phone: (919) 541-4259
E-mail: bryann.benton@nih.gov
P42, R01, R25 Grants

eRA Help Desk:
Toll-free: 1-866-504-9552
Phone: 301-402-7469
TTY: 301-451-5939
Web: http://grants.nih.gov/support
Email: commons@od.nih.gov
Hours: Mon-Fri, 7am to 8pm Eastern

Prior Approval Requests

Circumstances may change throughout the period of a grant award. Many changes do not need to be reported to NIEHS; however, there are several situations when official notification is needed in order to authorize changes to an award. This is referred to as "**Prior Approval**".

A Prior Approval request made to NIH 30 days prior to any anticipated changes in grant circumstances. Please refer to Grants Policy Statement 8.1.2 for circumstances under which prior approval may be required. An official prior approval means that you send an official request (pdf attachment in an e-mail) from your Institute's Authorized Organization Representative (AOR) to SRP grants management staff (cc: program administrator) that includes: a letter with reason for the post award change. The Grants Management Officer (GMO) will review the request and provide a response to the AOR regarding final disposition of the request. Please contact your AOR for institutional guidelines. For all requests, please include the grant number and PI name in the body of cover letter, requests, and as part of the subject line of your email.

This document summarizes some of the most frequently asked questions related to prior approval requests for common changes that occur throughout the duration of a grant.

Changes in Key Personnel and Other Personnel

While it is a courtesy to let your SRP Program Administrator know when there are changes in personnel associated with your grant, NIH has specific policy for individuals who are named as “Key Personnel” on your grant “Notice of Award” or NOA. For Center grants, Key Personnel tend to be each Project and Core leader as well as the Center Director. For all other grants, “Key Personnel” are usually only the Principal Investigator (PI). This section gives you an idea which types of changes require “prior approval”.

Key Personnel effort is reduced by 25% or more, withdraws from the project entirely or is absent for a continuous 3 months or more, a prior approval request would be required. This request should be sent at least 30 days prior to effective date of the change and should be submitted in the form of a pdf attachment in an e-mail from your Institute’s business official to the your grants management and program staff.

The request should include: a cover letter with reason for the change, a timeline for the change, a justification for selection of the individual who will replace the key personnel (if applicable), the biosketch of the proposed new individual (if applicable), and any other related materials (e.g. changes in staff contact details).

Please note that reporting of staff changes in annual progress reports/updates does not constitute official approval.

For other personnel who are not listed on the NOA, official prior approval is not required; however, we ask that you notify your SRP Program Administrator and provide updated contact information to ensure that new personnel are included in appropriate programmatic listservs and website information.

Note: Changes in P42 Center Director are rare and require early communication with SRP staff to ensure that an appropriate transition process will be followed. Therefore, it is imperative that your SRP Program Administrator be notified about the possibility of a change in Center Director 6 to 12 months prior to any effective change.

Key Personnel Moves to Another University: If the PI of an R01, R25, or SBIR/STTR plans to change institutes (move to another university), prior approval is required. In the case of P42 Project and Core leaders, many cases, prior approval is not required if project/core leader key personnel transfers institutes unless the activity constitutes a change in scope or there is transfer of work to a foreign component. Unless prior approval is required, these changes should be listed in the next progress report; however, please notify your SRP Program Administrator with updated contact information to ensure personnel are added to appropriate programmatic listservs and website information.

Note: Transfer of institution for a P42 Center Director is rare and requires early communication with SRP staff. Therefore, it is imperative that your SRP Program Administrator be notified about the possibility of a transfer of institution for the Center Director 6 to 12 months prior to any effective change.

Sabbatical Leave: For Key Personnel, when a PI is absent from the institute for a continuous period of 3 months or more, prior approval is required even if the PI intends to continue grant-related work at the sabbatical location. SRP Program Administrators need to determine whether an interim PI should be identified due to PI absence. Hence,

if you anticipate Sabbatical leave greater than 3 months, please notify your SRP Program Administrator and initiate prior approval process.

Significant Changes to Center Structure or Scope

Any significant change in scope in a project or core requires prior approval. Contact your SRP Program Administrator at least 4-6 months prior to making modifications to the scope of a project or core to determine whether the proposed changes necessitate a prior approval request. If it is determined a prior approval request is needed, please send your request as an official letter (.pdf attachment in an e-mail) from your Institute's business official to SRP program and grants management staff with justification for the change.

Requests for Supplemental Funds

Administrative Supplements are requests for additional funds to meet emergency or other unanticipated situations that result in unforeseen costs or to follow up on unanticipated results or to enhance components of research that have been unexpectedly productive. In addition, SRP provides supplements for training such as for KC Donnelly Externship (i.e. an exchange between SRP Grantees or an SRP Grantee and a Federal Research Laboratory) and for promoting diversity in environmental health sciences. Details about and the process for submitting Administrative Supplements may be found on the Materials for Grantees main page.

Requests for Conference Funding

The Superfund Research Program is now participating in the R13 Program for support of Conference and Scientific Meetings. For more information about the R13 mechanism, please see the following website: http://www.niehs.nih.gov/funding/grants/mechanisms/r13u13/ or contact Heather Henry (henryh@niehs.nih.gov).

Carryover Requests – for Center Grants (P42) Only

If you have unobligated funds remaining at the end of the grant's budget period, you may request for Carryover of Unobligated Funds from prior budget periods into your current budget period. Carryover requests are typically processed by SRP Grants Management and Program Staff beginning August 15, and we intend to approve Carryover requests by September 30. (If you do not plan to submit a carryover request, please let your Program Administrator know.) To do that efficiently, please submit the following three items to facilitate the process:

A. Your Federal Financial Report (FFR) is due by your institutional business office to NIH (via eRA Commons) on or before June 30 to avoid auditing issues. The FFR must be received and approved by NIH (Office of Financial Management) prior to a request for Carryover of unobligated funds and before SRP Grants Management and Program Staff can begin to process your carryover request. Any delay in the FFR may result in a delay in processing a carryover request.
B. Please have your Institute's Authorized Organizational Representative (AOR) send the following information to SRP Grants Management and Program Staff:

i. A cover letter requesting Carryover Funds (balance should match what is stated in the FFR) which includes a clearly written description of why there is an unobligated balance (e.g., projects and cores contributing to the carryover balance) and the intended use of carryover funds in the following budget year. The letter should be signed by the AOR and the Center Director.
ii. **New**: Please use the PHS 398 Form for the proposed budget for carryover of unobligated balance for each project and core. Also include a description of how these funds will be spent in the respective direct cost budget category. When completing the forms, please be specific and avoid jargon in the explanation of how the funding will be spent in the next funding cycle. If abbreviations are going to be used, please define them in the forms.
iii. Your AOR should send the signed cover letter and PHS 398 Forms as a pdf via email or fax (301-480-2725) to Bryann Benton (bryann.benton@nih.gov) and your Program Staff listed on the Notice of Grant Award no later than August 15. Any request received after Aug 15 may not be processed prior to November 1st.

C. In addition to the standard carryover request, please consider the following:
i. Justification for the use of carryover funds in the next budget period must be within the approved scope of the grant.
ii. Unobligated funds that have not been approved for carryover may be used by our office to offset future year costs for your SRP grant.
iii. For more information, please see Grants Policy Statement for Carryover of Unobligated Balances: http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch8.htm#_Toc271264933

Progress Reports

For multi-year awards, a progress report is due and must be approved before funds will be released for the next non-competing out years. The progress report must be submitted to eRA commons by the following due dates:

- For P42 Center Grants: The progress report is due 60 days (for non-SNAP) prior to the next budget start date (Due date: February 1).
- For R01s: The progress report is due 45 days (for SNAP) prior to the next budget start date (Due date: April 15).
- For SBIR/STTRs: The progress report is due 45 days (for SNAP) prior to the next budget start date (Due date varies per awardee – see your Notice of Award).

If this is your first time submitting a progress report to NIH, please contact your AOR to become familiar with your institute's submission procedures and internal deadlines.

Please note that NIH has transitioned to the government-wide "Research Performance Progress Report (RPPR)" progress report format NOT-OD-15-014 and no longer uses the PHS 2590 progress report format. For reference, NIH RPPR instructions are available on the following website: http://grants.nih.gov/grants/rppr/index.htm. Because the transition to the RPPR is an evolving process, SRP will provide specific details of what to include in your progress report closer to its due date. These details are provided on the Materials for Grantees webpage in a separate document.

No Cost Extensions

If at the end of the project end date, a grantee needs more time to complete tasks, they may request a "No Cost Extension" (NCE). Grantees must use the eRA Commons No-Cost Extension feature to electronically notify NIH that they are exercising their one-time authority to extend without funds the expiration date of an award. This extension may be up to 12 months beyond the final budget period end date. In the eRA Commons, this notification can be made up to the last day of the current project end date. Upon receipt of this notification, the budget and project period end dates are automatically extended in the eRA system and an e-mail notification is automatically sent to the GMO. No further action is required by the grantee.

If you miss the deadline (last day of your current project end date) or need an additional year NCE, a prior approval request is required. Send your prior approval request as a pdf attachment in an e-mail from your Institute's AOR to SRP grants management staff (cc: program administrator) that includes: a letter with reason for incomplete tasks and a timeline for completing the remaining activities. The Grants Management Officer (GMO) will review the request and provide a response to the AOR regarding final disposition of the request. Please contact your AOR for institutional guidelines. For all requests, please include the grant number and PI name in the body of cover letter, requests, and as part of the subject line of your email.

Grant Closeout

Closeout requirements can be found in section 8.6 in the Grants Policy Statement as well as in the Terms for your Notice of Award. When a grant comes to an end, grantees must submit the following closeout reports:

- Final Federal Financial Report (except for Fellowships)
- Final Progress Report* (except for Fellowships for which the Termination Notice will continue to serve as the Final Progress Report). *NIH is updating its Final Progress Report (FPR) process in 2015/2016 and will introduce the federal-wide "Final Research Performance Progress Report (FRPPR)" to replace the FPR.
- Final Invention Statement and Certification

All reports required for closeout must be submitted no later than 90 days after the project end date. The Final Federal Financial Report ***must*** be submitted through the eRA Commons at https://commons.era.nih.gov/commons. (Also see eRA Commons User Guide.) Grantees are ***strongly encouraged*** to submit the Final Progress Report and the Final Invention Statement (if applicable) through the eRA Commons (as opposed to mailing a hard copy to NIH).

SRP and NIEHS urge you to please submit your closeout documents in a timely fashion. New NIH Closeout Policy (NOT-OD-14-084) emphasizes the importance of timely closeout process to prevent forfeiture of funds.

Foreign Projects or Studies

Any foreign studies, collaborations, or sub-contracts not approved for the competitive application require NIEHS, NIH, and other Federal approval. You must provide the following information: a detailed description of the project and a justification for why it must be performed

outside the domestic US or with a foreign collaborator. Please be aware that foreign projects need complete and compelling justification. Examples of these projects include access to a population exposed to a chemical or level of a chemical agent that does not occur in the US; a collaborator with a singular piece of equipment or resource that is not available in the US; or a population with a unique set of polymorphisms (such as in a unique and identified, large family) and exposure history. See 8.1.2.10 in Grants Policy Statement http://grants.nih.gov/grants/policy/nihgps_2013/nihgps_ch8.htm#_Toc271264939.

Lobbying Guidance for Grantee Activities

The NIH has provided guidance on the use of appropriated funds by NIH and its grantees for advocacy, lobbying, and related activities. For more information please see the Lobbying Guidance for Grantee Activities and the Reminder of Lobbying Prohibition on Federal Funds for All NIH-Supported Institutions.

Trainee Tracking: eRA Commons ID and CareerTrac

New NIH Policy NOT-OD-13-097 requires that each trainee have their own eRA commons account.

CareerTrac is an NIH/NIEHS-funded system to enable evaluation of the training program for SRP trainees (i.e., pre- and postdoctoral trainees either directly supported or conducting research/activities supported by SRP P42 or R01 grants) specializing in the environmental health sciences. CareerTrac is accessible through the NIEHS Research Partners website.

Please contact Danielle Carlin phone: (919) 541-1409 or email: danielle.carlin@nih.gov for specific instructions for adding trainees to eRA Commons and CareerTrac.