

# 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. 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.

### 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 to authorize changes to an award. This is referred to as “**Prior Approval**”.

A Prior Approval request should be provided to NIH 30 days prior to any anticipated changes in grant circumstances. Please refer to [Grants Policy Statement](#) for circumstances under which prior approval may be required. An official prior approval is an official request sent by email from your Institute’s Authorized Organization Representative (AOR) to the SRP grants Management Officer (GMO) and Program Administrator that includes a letter with reason for the post award change (pdf attachment in an e-mail). The NIEHS 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 from the AOR, please have them include the grant number and PI name in the subject line of the email and in the body of the cover letter and the request.

### NIEHS Staff Contacts

#### Program Administrators:

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P42, SBIR/STTR 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](mailto:commons@od.nih.gov)  
Hours: Mon-Fri, 7am to 8pm Eastern

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Below are some of the most common prior approval requests that occur throughout the duration of a grant:

### 1) 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” (NOA). **For P42 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”.

**A prior approval request is required for Key Personnel effort that is reduced by 25% or more, withdraws from the project entirely or is absent for a continuous 3 months or more.** This request should be sent at least 30 days prior to the effective date of the change and should be submitted in the form of a pdf attachment in an e-mail from your Institute’s AOR to the your SRP 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), an NIH biosketch of the proposed new individual, 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.

### 2) 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.

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### 3) 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. Your SRP Program Administrator will 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.

### 4) 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. Examples of changes in scope include the addition or deletion of a specific aim or the addition of human subjects and/or vertebrate animals if they were not proposed in the initial review of the grant application (please review the NIH Grants Policy Statement for more examples). 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 AOR to your SRP grants and program management staff with justification for the change.

## Administrative Supplements

[Administrative Supplements](#) are requests for additional funds to meet emergency or other unanticipated situations that result in unforeseen costs. They may also be used 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. Note: it is important that you contact your SRP Program Administrator before applying for a supplement to ensure that the request is within scope of the parent grant and to determine whether a supplement is the most appropriate mechanism given timing and budgetary constraints.

## Requests for Conference Funding

The Superfund Research Program participates 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 Brittany Trottier ([brittany.trottier@nih.gov](mailto:brittany.trottier@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** of each year, and we intend to approve Carryover requests by

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**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 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. If you have questions about what to include in the letter, please contact your Program Administrator before submitting your Carryover request.
  - ii. 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 to the SRP GMO (Ms. Lisa Edwards ([archer@niehs.nih.gov](mailto:archer@niehs.nih.gov))) and your Program Administrator listed on the Notice of Grant Award no later than August 15. Any request received after Aug 15 will be delayed in processing.
- 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 (see section above “**Significant Changes to Center Structure or Scope**” for what constitutes a change in scope, which may require prior approval).
  - 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/policy.htm>)

## Progress Reports

For multi-year awards, a Research Performance Progress Report (RPPR) 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 and R25s: 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).

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- 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.

NIH RPPR instructions are available on the following website:

<http://grants.nih.gov/grants/rppr/index.htm>. Because the RPPR process is constantly evolving, SRP staff 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 NIEHS 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 you SRP GMO (cc: program administrator) that includes: a letter with reason for incomplete tasks and a timeline for completing the remaining activities. The 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 subject line of your email, body of the cover letter, and the specific request.

### **Grant Closeout**

Closeout requirements can be found in section 8.6 of Grants Policy Statement as well as in the Terms for your Notice of Award. SRP and NIEHS urge you to please submit your closeout documents in a timely fashion. Please review NIH Closeout Policy ([NOT-OD-18-107](#)) and please note that there are new requirements for [Interim](#)- and [Final](#)-RPPRs.

When a grant comes to an end, grantees must submit the following closeout reports whether or not the grant is renewed:

- Final Federal Financial Report
- Final Invention Statement and Certification
- Final Research Performance Progress Report (F-RPPR) or Interim Research Performance Progress Report (I-RPPR)

All reports required for closeout must be submitted no later than 120 days after the project end date (if a no cost extension is requested, the project end date is the end of the no cost

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extension). 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](#).) The Final/Interim-RPPR and the Final Invention Statement (if applicable) are submitted through eRA Commons (as opposed to mailing a hard copy to NIH).

The following webpages provide guidance for the Final Research Performance Progress Report (F-RPPR) or Interim Research Performance Progress Report (I-RPPR); however, please see (below) specific guidance tailored to your grant's mechanism. Contact your Program Officer if you have any questions.

- Final Research Performance Progress Report (F-RPPR) or Interim Research Performance Progress Report (I-RPPR) <https://grants.nih.gov/grants/rppr/index.htm>
- Overview of I-RPPR (and F-RPPR): [https://era.nih.gov/erahelp/commons/Commons/rppr/Interim\\_RPPR/interim\\_RPPR\\_overview.htm#Overview](https://era.nih.gov/erahelp/commons/Commons/rppr/Interim_RPPR/interim_RPPR_overview.htm#Overview)
- What to include in the FRPPR / IRPPR: [https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final\\_RPPR.htm](https://era.nih.gov/erahelp/commons/Commons/status/closeout/Final_RPPR.htm)

**Multi-Component (P42) I-RPPR / F-RPPR:** These – as well as other closeout documents - are due 120 days after the budget period (which may have been extended due to no cost extension requests). If your Center is in competition status at that time (most likely scenario), you will submit an I-RPPR. If your Center is no longer competing, you will submit an F-RPPR. The forms are exactly the same – the only difference is that NIH converts your I-RPPR to an F-RPPR in the event that the grant is unsuccessful in the competition.

For Multi-Component grants, the I-RPPR / F-RPPR process is a simplified version of the regular RPPR process in that all reporting is done through the “Overall” component. Hence, progress from the projects and cores must be combined for this submission. In eRA Commons, you will be asked to fill in the Sections A, B, C, D, E, G, I for the I-RPPR / F-RPPR. We suggest the following approach:

- A. Cover Page: Follow instructions.
- B. Accomplishments: For each project and core, include a summary of advances since the last RPPR report – i.e. the current reporting year plus all no cost extension years. Combine all projects/cores in one attachment. For content, refer to SRP's RPPR instructions for components section “B2 Studies and Results” which includes a “Progress Update for SRP Website” (250 words) and a “Full Progress Report” (up to 2 pages).
- C. Products: List publications, patents, data citations, etc. for all projects/cores since the last RPPR report – i.e. the current reporting year plus all no cost extension years.
- D. Participants: Include all participants for the current reporting year plus all no cost extension years. Follow RPPR guidelines for criteria for inclusion for the “Participants” section.
- E. Impact (optional): Generally, this section does not apply to P42s; however, other mechanisms use this section to describe ways in which the grant made an impact, or is likely to make an impact, on commercial technology or public use, including: transfer of results to entities in government or industry; instances where the research has led to the initiation of a start-up company; or adoption of new practices. You may report such items

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in section “E. Impacts,” or you can mark this section as “Not Applicable” and include any of these items as part of “C. Products.”

- G. Special Reporting Requirements: Include an attachment with the names of attendees at the SRP Annual Meeting(s). If the project period included more than one SRP Annual Meeting, please break it down by year.
- I. Project Outcomes (summary of Center for the [NIH RePORTER](#) website): Summarize, in plain language, the success of the whole Center from the most recent award period (that is, since your most recent competition, or, usually, 5 years). This section is limited to 8000 characters (*approximately* 2-3 pages) **for the entire Center**. We recommend including a succinct description of the major accomplishments of each Project and Core as well as any other overarching accomplishments of the Center. (Tip: Often, this would be included as part of the Overall section of the competitive renewal). Please note: the “Project Outcomes” will be posted on [NIH RePORTER](#), so it is important to **redact any proprietary information and write in lay language for the general public** (NIH will not approve I-RPPR / F-RPPR if the “Project Outcomes” section is written in technical jargon).

Note: Sections F: Changes and Section H: Budget are not part of Interim/Final RPPR.

**Other SRP Mechanisms (R01, R13, R25, R41-44) I-RPPR / F-RPPR:** The **I-RPPR / F-RPPR** – as well as other closeout documents - are due 120 days after the budget period ends (which may have been extended due to no cost extension requests). In eRA Commons, you will be asked to fill in the Sections A, B, C, D, E (required for SBIR/STTR), G, I for the I-RPPR / F-RPPR. For Sections A – G, include relevant information **since the last RPPR report** – i.e. the current reporting year plus all no cost extension years. For Section “**I. Project Outcomes**” summarize accomplishments **over the entire grant** (all years). “Project Outcomes” will be posted on the [NIH RePORTER](#) website. This section is limited to 8000 characters (*approximately* 2-3 pages). Because this section will be publicly available, please **redact any proprietary information and write in lay language for the general public**. NIH will not approve I-RPPR / F-RPPR if the “Project Outcomes” section is written in technical jargon. Follow instructions in the I-RPPR / F-RPPR guides (see links above) for general instructions. For specific instructions tailored to your grant mechanism, please see the tips below:

**R01 Individual Research Grant F-RPPRs** – Generally, R01s will include an F-RPPR since the SRP R01 RFAs are typically not re-released. Contact your PO for questions about specific instructions (Heather Henry, [henryh@niehs.nih.gov](mailto:henryh@niehs.nih.gov); 984-287-3268).

**R13 Conference Grant F-RPPRs** – Generally, R13s will include an F-RPPR since they are typically not re-released. Please include sections in the “B. Accomplishments”: title, date (including year), location of the conference. Please be sure to identify how the NIEHS funds were utilized (e.g. information about the people you traveled and their role in the conference). Please include websites and information about potential outcomes, such as publications. If the conference resulted in a consensus decision/message; identification of new scientific opportunities; or identification of research gaps; please use include in your F-RPPR. Contact your PO for questions about specific instructions (Brittany Trottier, Phone: 984-287-3331 Email: [brittany.trottier@nih.gov](mailto:brittany.trottier@nih.gov)).

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**R25 Occupational Health Grants I-RPPRs / F-RPPRs** – Contact your PO for questions about specific instructions (Danielle Carlin, Phone: 984-287-3244; E-mail: [danielle.carlin@nih.gov](mailto:danielle.carlin@nih.gov)).

**R41-R44 (SBIR/STTR) I-RPPRs / F-RPPRs** – Contact your PO for questions about specific instructions (Heather Henry, [henryh@niehs.nih.gov](mailto:henryh@niehs.nih.gov); 984-287-3268).

## 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 the NIH Grants Policy Statement (Section 8.1.2.10) for more information.

## 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

The SRP defines "trainees" as graduate students and post-doctoral researchers as either supported directly by the Center or performing research/activities that are supported by a P42 or R01 grant. In addition, NIH Policy [NOT-OD-13-097](#) requires that each trainee have their own eRA commons account 1 calendar month or more, regardless of source of funding.

CareerTrac is an NIH/NIEHS-funded system to enable evaluation of the training program for SRP trainees specializing in the environmental health sciences. CareerTrac is accessible through the [NIEHS Research Partners](#) website.

Please contact Brittany Trottier ([brittany.trottier@nih.gov](mailto:brittany.trottier@nih.gov)) for specific instructions for adding trainees to eRA Commons and CareerTrac and the pertinent trainee information that should be added to the system.

## Logos

If you would like to use the Superfund Research Program, NIEHS, or NIH logos on any electronic or printed materials, please contact Christine Bruske Flowers, Director of the NIEHS Office of Communications & Public Liaison, for guidance on proper use of the logos and to request the image files. Ms. Flowers can be reached at [bruskec@niehs.nih.gov](mailto:bruskec@niehs.nih.gov).

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