

Grants Administration: Post-Award Topics

An Overview for Investigators after the award...

What will be discussed...

- Explanation of the Notice of Award (NoA)
- Accounting for the funding of an award
- Annual Reporting
- Prior approval – specific situations
- Unobligated balances
- Things to remember
- Resources

The Notice of Award (NoA)

- Legally binding document
- Identifies grants number, recipient, PD/PI
- Establishes funding level and period of approved support with future year commitments
- Sets forth terms and conditions
- Includes awarding agency contact info – Grants and Program
- Electronically available to recipient

Accounting for the funding in the NoA

- 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 grant
- The recipient indicates acceptance of all terms and conditions included in the award by drawing down funds from the Payment Management System

Annual Reporting

- Annual reports are required to be submitted using the [Research Performance Progress Report \(RPPR\)](#)
 - Required for “SNAPs” and non-SNAP awards
- SNAP RPPRs (ex. virtually all K-series grants)
 - Due no later than 45 days prior to the listed start date
 - Does not require detailed budgets, IRB and/or IACUC approvals
 - Federal Financial Report due at end of competing segment
 - SNAP Questions: Change in other support? Change in effort for key personnel? Unobligated balance greater than 25%?

Annual Reporting

- Non-SNAP RPPR
 - Same as SNAP RPPR except:
 - Due no later than 60 days prior to listed start date
 - Requires detailed budget
 - Annual Federal Financial Report
- Ensure all programmatic requirements are accounted for (as appropriate)

Prior approval issues – the Rules

- All requests for prior approval must be:
 - Submitted in writing/e-mail letter – included complete grant number, PD/PI name and recipient name
 - Must be submitted by the Authorized Organizational Official for the recipient
 - Best to 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 – the Rules

- Standard terms and conditions of award grant 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)
 - 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)

Prior Approval – the Rules

- The following items do require prior approval which can only be provided by the grants management office (in consultation with Program)
 - Additional 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

Prior Approval – 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 your request
 - Include any biosketch and other support
 - If multi-PI, address the leadership plan

Prior Approval – Change in PI’s Effort on a K-award

- For mentored Ks, there is the option to request a reduction in effort (not less than 6 calendar months or 50%) in the 2nd to last or last year of the K-award – [NOT-OD-08-065](#)
- This is done only when you become a PI on a competing NIH research-grant application or a sub-project director on a multi-component or center grant
- K award must be active when the competing research grant is submitted
- Does not apply if the “PI” of a subcontract project – has to be an official multi-project such as a P01
- K-award will be reduced as appropriate with the approved change

Prior Approval – Change of Recipient Organization

- Award belongs to the recipient and must be relinquished (even for Ks)
- Need to submit a change of recipient organization application (in essence, a new competing award)
 - Can be done [electronically now](#)
- Address any impact to the award because of the change in organization including:
 - Budget
 - Scientific/research plan
 - Humans and/or animals involvement (i.e. need new approvals)
 - Progress report depending on timing

Prior Approval – Change of Recipient Organization

- 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 will not be the site substantially involved

Prior Approval – 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

Prior Approval – Additional Funds...if money is available!

- Supplements to the award in the form of competitive or administrative
- Competitive Supplements:
 - Expansion in scope
 - Peer-reviewed
 - Must be in response to an FOA
- Administrative Supplement:
 - Is within the approved scope (not an expansion)
 - Supporting costs not originally budgeted for in the competing request
 - Does not need to response to an FOA
 - Can be submitted [electronically](#)

Post-Award Issue – 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

Post-Award Issue – unobligated balances

- Consider with your award has “carryover authority” or not (listed on NoA)
- NIH is held to the Bona Fide Need Rule – can we (the awarding agency) expect all available and yet to be awarded \$ to be spent in the listed time period given what is scientifically planned?
- Provide an accurate estimate of the balance and assessment of the project
- Be clear in explaining what may have occurred and what you are planning

Post-Award Issue – Unobligated Balance

- Tips in working with NIH on situations regarding your balance:
 - Balances typical equate to slow progress – be forthcoming
 - Submit timely reports (FFRs) and information
 - Discuss options proactively

WE ARE NOT LOOKING TO TAKE THE \$! We are looking to do what is in the best interest for all parties!

Things to Remember

- Prepare for closeout for any projects that are ending
 - Close-out is serious business – see [NIH guidance](#)
- Submit timely reports and applications
- Stay on top of your associated requirements (ex. [Public Access](#) and [Financial Conflict of Interest](#))
- Make sure you know your organization's policies and procedures – they may be more rigid than the Federal requirements

Resources (some of many)

- NIH Grants Policy Statement (11/2016) which includes comprehensive info on prior approval requirements
 - <http://grants.nih.gov/grants/policy/nihgps/HTML5/introduction.htm>
- NIH Forms & Applications
 - <http://grants.nih.gov/grants/forms.htm>
- NIH Grants Compliance and Oversight
 - <http://grants.nih.gov/grants/compliance/compliance.htm>
- NIH Outreach Activities and Resources
 - <http://grants.nih.gov/grants/outreach.htm>



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