

Fogarty International Center NIH Grants Update

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Grants Update

BRAIN Network Meeting
October 22-23, 2012





Topics to Cover

- **Budget and funding levels**
- **Policy update**
- **Progress reports**
- **Common Questions**
- **New Applicant Submissions**



Budget and Funding Level News

- NIH is currently operating under a continuing resolution at the FY2012 level + 0.6%
- Non-competing awards will be issued at a level lower than indicated on the Notice of Grant Award until FY2013 appropriations are enacted
- <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-13-002.html>



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POLICY UPDATES



ARRA

- **Timely Quarterly and Closeout Reports Required (Final progress report, final financial report, final invention statement)**
- **Accelerating Unspent ARRA Awards**
We continue to strongly encourage grantees to accelerate expenditures for all active ARRA grants regardless of the current or projected project period end date.
- **NIH issued on December 13, 2011, [NOT-OD-12-014](#), Notice of Revised Term of Award for All Recovery Act Awards to Ensure Project Completion by September 30, 2013.**



Fiscal Policy for Grant Awards under CR

- No cost-of-living or inflationary increases for
 - Non-competing award levels for FY2013
 - Future years in the non-competing award
- Currently, the salary Cap of Executive Level II (\$179,700) remains in effect for all grants issued after December 23, 2011
- Grantees may re-budget to other categories if there are salary funds in excess of the salary cap
- Salary cap does not apply to consultants but does apply to subawards



Office of Extramural Research Policy Update

- Revised Regulation on Financial Conflict of Interest (FCOI)
 - <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-11-121.html>
 - Minimum threshold of \$5000 for payments and equities
 - FCOI must relate to investigator's professional responsibilities at the institution and the federally funded research; must contain a management plan
 - An institution's FCOI policy must be accessible via a public website
 - More rigorous reporting to include annual FCOI reports
 - Submission through FCOI module in eRA Commons
 - FCOI Investigator training prior to start of research



Financial Conflict of Interest

- The eRA FCOI Module has been updated
- 8/12/2012 Training Webinar on FCOI Reporting Requirements and eRA FCOI Module Demo (archived) found at <http://grants.nih.gov/grants/policy/coi/index.htm>
- Checklist for Policy Development for grantees
- Presentations and Case Studies
- Summary Charts on FCOI Reporting Requirements
- FAQs
- Tutorial (with certificate of completion)
- Summary of Changes to the Regulation



Financial Conflict of Interest-continued

- **Initial and annual FCOI Reports are provided to NIH through the FCOI Module**
 - **Before expending funds**
 - **During the period of award**
 - Within 60 days of identifying a new FCOI**
 - **Annually**
 - At the same time as when the annual progress report or multi-year progress report is due or at time of extension**



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FCOI Resources

- Mailbox for inquiries
 - FCOICompliance@mail.nih.gov

- OER FCOI Web Site
 - <http://grants.nih.gov/grants/policy/coi/>



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New Grants Policy Statement

- **New Grants Policy Statement was published 10/1/2012**
- **This version will supersede the October 1, 2011 (http://grants.nih.gov/grants/policy/nihgps_2012/index.htm)**



Policy Updates for Foreign Grantees

- **Foreign awards will now be paid using the Payment Management System**
- **Carryover of an unobligated balance from an award issued prior to October 1, 2012 to an award issued after that date must be done with NIH assistance;**
- **For all initial SNAP awards issued to foreign institutions after October 1, 2012, foreign grantees are not required to report expenditure data annually via the FFR. FFR expenditure data is required only at the end of a competitive segment for SNAP awards**



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Policy Updates for Foreign Grantees

- For initial awards issued after October 1, 2012 when preparing the FFR expenditure data, grantees must use the currency rate in effect at the time the funds are drawn down from PMS;
- For additional information, including the process for foreign grantees to register for PMS, please see NIH Guide Notice [NOT-OD-12-139](#).
- Stay tuned for more news about this transition

Changes in Human Subjects Policy and Prior Approval



- One of the potential indicators of a change in scope is a change from the approved involvement of human subjects (this is a prior approval action)
- NIH Guide Notice [NOT-OD-12-129](#) provides detailed guidance on the types of changes in human subjects research awards that will require prior NIH approval and provides information on the process for submission of such requests
- Generally , any modification in the research design that amplifies risk to human subjects will require prior approval
- Must be submitted 30 days before the proposed change



Delayed-onset Human Subjects Research

- **At times a grant is submitted with the intent to utilize human subjects during the project period but without a definitive plan when and how the work will be done
(delayed-onset human subjects research)**
- **In this case, the grantee must submit a detailed human subjects plan as required in the competing application to the awarding IC for approval prior to conducting research on human subjects.**
- **Clarification may be found here:
<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-130.html>**



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PROGRESS REPORTS

Research Performance Progress Reports (RPPR)



- **Intent: Standardize progress reporting across federal agencies**
- **NIH implementing as a module in Commons; will replace PHS 2590, including eSNAP, and 416-9**
- **Includes standard fed-wide questions and NIH-specific data elements**
- **Mandated use of the new RPPR module is expected for all SNAP awards Spring 2013 (strongly encouraged to use SNAP)**



Differences in the RPPR from the SNAP

- **Format is different from eSNAP, but the information requested is similar**
- **SNAP awards will still not require budget**
- **Publications from PI's MyNCBI indicate Public Access Policy compliance status;**
- **Includes live links to Notice of Award;**
- **Streamlines ClinicalTrials.gov reporting**
- **Content varies depending on activity code**



RPPR Changes

- **New data collection on foreign components, dollars to foreign countries, and foreign affiliation of personnel;**
- **Effort for all participants must be rounded to nearest whole person month;**
- **Other support only required if change;**
- **Clarifies when report may be used to request prior approval (ONLY for reduction in level of effort for PD/PI or Senior/Key listed in NoA)**



SNAP RPPR Due Dates

- **SNAP RPPRs are due the 15th of the month preceding the month in which the budget period ends.**



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RPPR Training

- **October 17, 2012 Webinar for Grantees
1:30-3:00 pm EDT**
- **Transcripts and PPTs have been archived on the
RPPR webpage: <http://grants.nih.gov/grants/rppr/>**



Electronic Administrative Supplements

- **Electronic submission of administrative supplement pilot began February 1, 2012**
 - **Parent FOA PA-12-100 used for submission when we contact you for a specific request**
 - **Can submit through the eRA Commons**
To take advantage of pre-population of fields;
OR
 - **Can submit through Grants.gov**
For schools who have built systems to interact directly with Grants.gov
- **Supplement requests can come directly to us via email as well**



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Electronic Submission of Change of Grantee Organization

- **Pilot of electronic submission of post-award Change of Grantee Organization applications (Type 7)**
- **NIH Guide [NOT OD-12-134](#)**
- **Must use Parent FOA for Change of Grantee Organization Applications: [PA-12-270](#)**
- **Ability to submit Final Relinquishing statements via the eRA Change of Institution Module**

General Items to Include in the Progress reports



F O G A R T Y

- Items to include in the Progress Report Summary
 - Administrative challenges
 - Short term/ Long term program accomplishments
 - Future plans
 - Progress of supplement(s), including ARRA-funded supplements (separate out ARRA-funded accomplishments)
 - Ensure that manuscripts/publications have PMICD #s



Reminder on PMCID Numbers

- Note that PMID is different from PMCID. PMID applies only to abstracts while PMCID refers to the full text of the paper
- Include PMCID numbers for all trainees and personnel publications
- Include PMCID in the text of the progress report to refer to personnel or trainee publications
- The NIH Public Access Policy web site is <http://publicaccess.nih.gov/FAQ.htm>



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COMMON QUESTIONS



F&A Cost for Foreign Institutions

- 8% cost of modified total costs minus equipment is for **compliance** to NIH guidelines
 - Examples include protection of human subjects, animal welfare, financial conflict of interest, invention reporting, audit, public access policy issues
- Not a true F&A
- Think of **compliance** in BROAD terms, particularly if the institution has a challenging time in spending the 8% on only compliance costs
- Options for justifying a cost
 - Explain how a cost pertains to compliance
 - Or, find a way to charge a cost that would be normally deemed as direct cost as an F&A
 - Be consistent in your accounting and business practice when classifying a cost as a compliance cost



Allowable costs

- The NIH Grants policy is an excellent resource for determining allowability of a certain cost
 - Part II: Terms and Conditions of NIH Grant Awards, 7, Cost Considerations
 - http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch7.htm
 - Generally NIH follows
 - OMB Circular A-21 (relocated to 2 CFR part 220) Cost Principles for Educational Institutions
 - OMB Circular A-122 (relocated to 2 CFR part 230) Cost Principles for Non-Profit Institutions



Travel Policy

- US carriers must be used to the maximum extent possible and should **not** be influenced by cost, convenience, or personal travel, only a few exceptions to this dictate
 - **Travel delayed by 24 hours at the origin**
 - **Increases flight changes outside of US by two**
 - **Extends travel time by six hours or requires connecting flight wait time of four hours or more at overseas interchange point**
- Other than that, follow your institution's policy for travel
- If your institution does not have a policy, use Federal Travel Regulations issued by the U.S. General Services Administration (<http://www.gsa.gov/portal/content/104790>)
- Due to code-sharing airlines, this is not as much of a problem anymore.
- Estimates for travel costs provided in budget justification should be allocable, reasonable, and consistent



Prior Approval Actions

- Common actions that always require prior approval
 - Change in scope
 - Change in status of the PI or senior/key personnel names on NoA
 - Deviation from award terms and conditions
 - Foreign component added
 - Need for additional NIH funding
 - Additional no-cost extension after the 1st NCE



Actions that can be considered a change in scope

- Common actions that may be considered **indicators** and can **signal** a change of scope:
 - Change in specific aims
 - Change in the use of animal and/or human subjects
 - Transfer of substantive programmatic work to a third party
 - Significant re-budgeting
 - Purchase of a unit of equipment exceeding \$25,000



Existing NIH Policy Reminders

Institutional vs. NIH Policy

- **Remember.** Institutional policy can be more restrictive than NIH policy. If this is the case, then institutional policy trumps NIH policy.
- Institutional policies must be consistently applied regardless of the source of funding.
- **Maintain** communication with your business office.
- If your institutional policy allows something that is not allowable under NIH policy, then you can not charge costs associated with those activities to the grant.



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New Application Submission

Electronic Submission of Grant Applications for Foreign Institutions



- Video, transcript, and PPT slides of recent webinar from 9/27/12 are available here:

http://grants.nih.gov/grants/webinar_docs/webinar_20120927.htm

- Reviews required registration process, completing application forms, submitting through grants.gov, tracking status on eRA Commons



Key dates for the BRAIN R21/R01 to remember

- **Letter of Intent Due Dates:**
 - Non-AIDS Related Applications: January 14, 2013
 - AIDS Related Applications: March 11, 2013
- **Application Due Dates:**
 - Non-AIDS Related Applications: February 14, 2013
 - AIDS Related Applications: April 11, 2013

Funding Expectation Specific to the BRAIN program



- It is expected that the majority of funds (at least 51% or more the award) will be used for supplies, training costs, equipment, services, travel, and personnel at the LMIC site and that any funds spent at the HIC site will be directly related to the collaborative research or training under the grant and will involve the LMIC collaborators.
- Note also that funds from the grant should be set aside to attend the network meeting every year



Forms

Use the latest version of forms available for your Funding Opportunity Announcement (FOA)

- Identify form version by the Competition ID
- Competition ID ADOBE-FORMS-B2 currently used for most new FOA postings



Updated Forms and Instructions

- **[NIH Forms & Applications](http://grants.nih.gov/grants/forms.htm)** page has updated forms/instructions for progress reports, other post award actions)
<http://grants.nih.gov/grants/forms.htm>
- **Revised competing applications and instructions to be implemented in the summer of 2013, following electronic development of applicable forms**



Registrations

- Register Early!
 - Registration with both Grants.gov (organizations only) and eRA Commons (organizations & PD/PIs); must be completed before the submission deadline
 - Allow 4 weeks to complete new registrations.
- Keep registrations active
 - Central Contractor Registry (CCR) information must be updated at least every 12 months to remain active;
 - As of August 2011, Grants.gov rejects submissions from applicants with expired CCR;
 - Use your organization's DUNS to view your CCR registration status at <http://www.bpn.gov/CCRSearch/Search.aspx>



Application Submission Contacts

Application Submission Contacts

- [Grants.gov Customer Support](#) (Questions regarding Grants.gov registration and submission, downloading or navigating forms)
Contact Center Phone: 800-518-4726
Email: support@grants.gov
- GrantsInfo (Questions regarding application instructions and process, finding NIH grant resources)
Telephone 301-435-0714
TTY 301-451-5936
Email: GrantsInfo@nih.gov
- eRA Commons Help Desk (Questions regarding eRA Commons registration, tracking application status, post submission issues)
Phone: 301-402-7469 or 866-504-9552 (Toll Free)
TTY: 301-451-5939
Email: commons@od.nih.gov



Listservs

Email Updates - Subscribe to the Brain Disorders in the Developing World ListServ to receive updates on this program and related issues. Send an email to LISTSERV@LIST.NIH.GOV. Type in the body of the email SUBSCRIBE BRAIN-FIC-L

FIC Grants Competition Cycle 101



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- **FOA** Published (after 2-3 m writing, review, approval)
- **Letter of Intent** (1 m before receipt deadline)
- Application Receipt **Deadline** (>60 days after FOA)
- CSR **Review** (2-3m after deadline)
- **Scores** (1-2 days after review)
- **Summary Statement** (2-3 weeks after review)
- Review results presented- next FIC **Advisory Board** (Feb, May, Sept)
- FIC Director- **Funding Decisions** (w/i 1-2 weeks after Advisory Board meeting)

FIC Grants Cycle & Budget 101



- FIC/NIH budget submitted to Congress in Feb.
- USG Fiscal Year: Oct. 1-Sept. 30
- FY 2012 Continuing Resolution until mid-Nov.
- Sept. Advisory Board- new awards problem
- Non-competing awards- PRs due Jan-June
- Supplement Opportunities- May/June
- End of Fiscal Year Decisions- August- Sept

E Submission Resources: On Your Mark...



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- Grants.gov Institution Registration-4 steps
http://grants.nih.gov/grants/ElectronicReceipt/preparing_grantsgov_reg.htm
- eRA Commons Registration- institution & PIs
<http://grants.nih.gov/grants/ElectronicReceipt/preparing.htm>, http://era.nih.gov/applicants/how-to_steps.cfm#register
- FAQs for Foreign Institutions
http://grants.nih.gov/grants/ElectronicReceipt/faq_full.htm#special

E Submission Resources: Get Set.....



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- NIH Guide for Grants & Contracts
- Email announcements to PIs
- FIC Funding Newsletter:
<http://www.fic.nih.gov/Funding/News/Pages/default.aspx>
- FIC website:
<http://www.fic.nih.gov/FUNDING/Pages/default.aspx>
 - Fogarty Funding Opportunities
 - Trans-NIH Programs and Collaborations
 - Other NIH Funding Opportunities
 - Non-NIH Funding Opportunities
 - **Postdoctoral**
 - **Predoctoral/Graduate**
 - **Faculty**
 - **Health Professionals**
 - **Institutions**
 - **Travel**

E Submission Resources: Get Set....



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- Forms & Instructions: SF424
<http://grants.nih.gov/grants/funding/424/index.htm>
- Prepare an Application
http://grants.nih.gov/grants/ElectronicReceipt/prepare_app.htm
- Annotated Application Forms
<http://grants.nih.gov/grants/ElectronicReceipt/communication.htm>



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E-Submit!

- Submit, Track, Correct Errors & View
http://grants.nih.gov/grants/ElectronicReceipt/submit_app.htm
- Help Desks
http://grants.nih.gov/grants/ElectronicReceipt/files/international_support.pdf
- Avoiding Common Errors
http://grants.nih.gov/grants/ElectronicReceipt/avoiding_errors.htm

E-Submission Resources- International Applicants



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- Foreign Grant Information OER Webpage-
<http://grants.nih.gov/grants/foreign/index.htm>
- Help Desks for each step
http://grants.nih.gov/grants/ElectronicReceipt/files/international_support.pdf
- E Submission Tips for International Applicants
http://grants.nih.gov/grants/ElectronicReceipt/files/Tips_for_International_Applicants.pdf
- Common Q&A for International Applicants
http://grants.nih.gov/grants/ElectronicReceipt/files/international_qa.pdf
- Special Guidance for Foreign Research Grant Opportunities
http://grants.nih.gov/grants/foreign/special_guidance.htm



Useful Resources

- Office of Extramural Research (OER) Web Page
 - <http://grants.nih.gov/grants/oer.htm>
- NIH OER Nexus
 - <http://grants.nih.gov/grants/nexus.htm>
- NIH Guide for Grants and Contracts
 - http://grants.nih.gov/grants/get_connected.htm#listserv
[S](#)



Useful Resources cont.

- NIAID Site on International Grants
 - <http://www.niaid.nih.gov/researchfunding/int/pages/fos.aspx>
- Foreign Grants Information
 - <http://grants.nih.gov/grants/foreign/>
- NIH Grants Policy Statement
http://grants.nih.gov/grants/policy/nihgps_2012/index.htm



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Questions ?

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