Agenda

- Revised NIH Grants Policy Statement
- Q&A


March 2015 version
- Effective for awards with budget periods beginning on or after 12/26/2014
- Incorporates changes announced in previous notices
- Implements UG

October 2013 version
- Effective for awards with budget periods beginning between 10/01/2013 and 12/25/2014
Changes announced in previous notices

• Videos Submitted as Application Materials
• Post-Submission Application Materials
• Restricting Pornography on Computer Networks
• Pilot Program for Enhancement of Employee Whistleblower Protections
• Application Submission Policy
• Reporting Sex/Gender, Race, and Ethnicity Information
• Use of Individual Development Plans for Graduate Students and Postdoctoral Researchers
• Research Performance Progress Report
• Late Application Submission
• Legislative Mandates

Interim Guidance for Videos Submitted as NIH Application Materials (NOT-OD-12-141) – 09/27/2012

NIH
• Strives to
  • Accommodate ever-changing technology
  • Maintain fair standards for all applicants
  • Maintain compatibility with NIH information systems
• Will accept videos as non-traditional application materials
  • Unless specified in FOA


• Revised budget pages
  • e.g., change in budget request due to new funding or institutional acquisition of equipment
  • Biographical sketches
  • e.g., change in senior/key personnel due to the hiring, replacement, or loss of an investigator
  • Letters of support or collaboration resulting from a change in senior/key personnel
  • due to the hiring, replacement, or loss of an investigator
  • Adjustments resulting from natural disasters
  • e.g., loss of an animal colony
  • Adjustments resulting from change of institution
  • e.g., PD/PI moves to another university
  • News of an article accepted for publication
    • a copy of the article should not be sent

- All applications
  - News of professional promotion or positive tenure decision for any PD/PI and/or Senior/Key Personnel
  - Applications submitted for last due date of multiple-due date RFA
  - Updated Specific Aims or Research Strategy pages, late-breaking research findings, and new letters of support or collaboration
  - Institutional training and training-related grants (not Fs or Ks)
  - News of trainee's or former trainee's graduation, employment, promotion, funding, publication, or other professional achievement
  - News of faculty member's promotion, funding, publication, or other professional achievement
  - News of additional faculty member who will be involved in the training activity

Notice of Additional Legislative Mandate in Effect for FY2014 Restricting Pornography on Computer Networks (NOT-OD-14-062) – 02/27/2014

- NIH
  - None of the funds made available in FY2014 Consolidated Appropriations Act may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography

- UNMC “Computer Use/Electronic Information” policy 6051
- NU “Policy for Responsible Use of Information Resources” executive memorandum 16

Notice of Implementation of Pilot Program for Enhancement of Employee Whistleblower Protections (NOT-OD-14-068) – 03/07/2014

From July 1, 2013, to January 1, 2017
- Inform employees working on any federal award that they are subject to whistleblower rights and remedies of the pilot program
- Include such requirements in any subrecipient agreement

“Whistleblowing” = Making a disclosure that the employee reasonably believes is evidence of:
  - Gross mismanagement of federal contract or grant
  - Gross waste of federal funds
  - Abuse of authority relating to a federal contract or grant
  - Substantial and specific danger to public health or safety
  - Violation of law, rule, or regulation related to a federal contract or grant

Disclosure must be made to (among other options):
  - Management official or other employee of contractor, subcontractor, grantee, or subgrantee with responsibility to investigate, discover, or address misconduct
After an unsuccessful resubmission (A1), NIH and AHRQ will accept a new application (A0) that:
• Need not demonstrate substantial changes in scientific direction compared to the A1
• Must not contain a response to the previous reviewers’ comments ("Introduction")

The following policies remain in effect:
• NIH will not accept duplicate or highly overlapping applications under review at the same time
• A1 application must be submitted within 37 months of A0 application
• New Investigators may submit A1 applications for consecutive review cycles, using the New Investigator resubmission due dates (April 10, August 10, or December 10)

• No time limits between
  • Unsuccessful resubmission (A1) and new application (A0)
  • Unsuccessful new application (A0) and subsequent new application (A0)
• Unlimited number of submission cycles
  • NIH encourages applicants to update preliminary data, literature citations, letters of reference, et cetera, and to reflect the current status of the field
  • New application (A0) can follow unsuccessful new application (A0) without an intervening resubmission (A1)
NIH Launching New System and Procedures for Reporting Sex/Gender, Race, and Ethnicity Information to the NIH (NOT-OD-14-086) – 04/30/2014

RPPR
• Section G. Inclusion Management System

Descriptions on the Use of Individual Development Plans for Graduate Students and Postdoctoral Researchers Required in Annual Progress Reports beginning October 1, 2014 (NOT-OD-14-113) – 08/04/2014

Biomedical Research Workforce working group’s recommendations (June 2012)
• Require IDPs for all NIH-supported grad. students and postdocs, whether on training grants, fellowships, or research project grants

NIH
• “Strongly encourages” institutions to use IDPs for grad. students and postdocs supported by NIH awards
• Annual progress reports must include a description of whether/how IDPs are used
– RPPR Section B. Accomplishments – Question B.4

UNMC
• Grad. students: http://www.unmc.edu/gradstudies/news/idp.html
• Postdocs: http://www.unmc.edu/postdoced/current/forms.html

Reminder: NIH Requires the Research Performance Progress Report (RPPR) for All Type 5 Progress Reports (NOT-OD-15-014) – 10/16/2014

• Currently
  • SNAP
  • Non-SNAP
  • Fellowships
  • Multi-year funded awards
• TBA
  • Final reports
  • Administrative extensions (Type 4)
No later than two weeks, except
  • If “no late applications will be accepted for this FOA”
  • As part of the New Investigator Initiative
  • As part of Continuous Submission policy

Reasonable justifications
  • Death of an immediate family member of the PI
  • Sudden acute severe illness of the PI or immediate family member
  • Temporary or ad hoc service by a PI on an NIH advisory group during the two months preceding or following the application due date
  • Weather, natural disasters, or other emergency situations

Not reasonable justifications
  • Heavy teaching or administrative responsibilities
  • Relocation of a laboratory
  • Ongoing or non-severe health problems
  • Personal events
  • Participation in review activities for other Federal agencies or private organizations
  • Attendance at scientific meetings
  • Very busy schedule
  • Problems with computer systems at the applicant organization
Notice of Legislative Mandates in Effect for FY2015 (NOT-OD-15-054) – 01/12/2015

FY2014 Mandates
• Salary Limitation (Section 203)
• Gun Control (Section 217)
• Anti-Lobbying (Section 503)
• Acknowledgment of Federal Funding (Section 505)
• Restriction on Abortions (Section 506)
• Exceptions to Restriction on Abortions (Section 507)
• Ban on Funding Human Embryo Research (Section 508)
• Limitation on Use of Funds for Promotion of Legalization of Controlled Substances (509)
• Dissemination of False or Misleading Information (Section (515(b))
• Restriction on Distribution of Sterile Needles (Section 521)
• Public Access to Scholarly Publications (Section 525)
• Restriction of Pornography on Computer Networks (Section 526)
• Compliance with Guidance on the Spread of the Ebola Virus for Applicable Grants (603)

Uniform Guidance implementation

• Definitions
• Selected Items of Cost
• Administrative requirements
• Closeout

Uniform Guidance: Definitions

- Computing devices: Machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information.

- Expanded authorities: Operating authorities provided in Federal Administrative Regulations (e.g., A-110) to recipients that waive the requirement for prior approval of specified actions. NIH extended expanded authorities to all NIH awards except for the provision to automatically carry over unobligated balances. Because the NIH Standard Terms of Award, the term Expanded Authorities is no longer used at NIH.

- Foreign component: The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by researchers employed by a foreign organization, whether or not grant funds are expended. Activities that would meet this definition include, but are not limited to:
  1. the involvement of human subjects or animals
  2. extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities
  3. any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country.

Examples of other grant-related activities that may be significant are:
- collaborations with investigators at a foreign site anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site
- receipt of financial support or resources from a foreign entity

Foreign travel for consultation is not considered a foreign component.
Uniform Guidance: Definitions

Internal controls
A process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:
1. Effectiveness and efficiency of operations
2. Reliability of reporting for internal and external use
3. Compliance with applicable laws and regulations

Micro-purchase
A purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-Federal entity's small purchase procedures. The non-Federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and to minimize the associated administrative burden and cost. The micro-purchase threshold is $3,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

OMB Circulars
Government-wide guidance issued to Heads of Federal agencies by the Director of OMB. OMB Circulars directly pertinent to grants include the following:
• cost principles (OMB Circular A-21, OMB Circular A-87, and OMB Circular A-122)
• uniform administrative requirements (OMB Circular A-102 and OMB Circular A-110)
• audit requirements for non-profit organizations (OMB Circular A-133)

Some (but not all) of these OMB Circulars were reissued in Title 2 of the Code of Federal Regulations (CFR). Effective December 26, 2014, these Circulars were superseded by OMB’s Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) located in 2 CFR Part 200.

Simplified acquisition threshold
The dollar amount below which a non-Federal entity may purchase property or services using small purchase methods. Non-Federal entities adopt small purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 and in accordance with 41 USC § 1908.

Uniform Guidance: Selected Items of Cost

Materials and supplies, including Costs of Computing Devices
a) Costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award are allowable
b) Purchased materials and supplies must be charged at their actual prices, net of applicable credits. Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.
c) Materials and supplies used for the performance of a Federal award may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a Federal award.

Meals
Allowable for subjects and patients under study, or where specifically approved as part of the project activity, provided that such charges are not duplicated in participants’ per diem or subsistence allowances, if any.
When no line items are an integral and necessary part of a meeting or conference (i.e., a meeting that is an ancillary activity to a larger conference), grant funds may be used for such meals.
The cost of meals served at a meeting or conference, for which the primary purpose is the dissemination of technical information, is no longer allowable on NIH grants where the primary purpose of the grant is to support communication of scientific and technical information. For such a meeting, the cost of meals need not be based on a per diem allowance for each person present.

Uniform Guidance: Administrative requirements

“Expanded authorities”
• Rebudgeting that does not reflect a change in scope
• Carryover
• Except of Ps, Us, Ts, or otherwise indicated in NOA
• First no-cost extension up to 12 months
• Direct charging of administrative and clerical salaries
  • If services are integral to project
  • If individuals can be specifically identified with the project
  • If such costs are explicitly included in the budget
  • If the costs are not also recovered as indirect costs
• New subcontracting
  • If domestic
Uniform Guidance: Administrative requirements

- Prior approval
  - Change in scope
  - Carryover for Ps, Us, Ts, and others indicated in NOA
  - Second no-cost extension or more than 12 months
  - New subcontracting
    - If foreign

Uniform Guidance: Closeout

- Due within 120 days of end date
- Final federal financial report
- Final progress report
- Final invention statement

Questions