Current Issues at NIH: Grants Policy Updates

Session Transcript: 2022-2023 Grants Conference

Brian Sass-Hurst: Good morning, everyone, and afternoon, everyone, and welcome. For today's presentation, we will be providing updates on NIH policy and compliance topics as well as system processes. Intro for myself: my name is Brian Sass-Hurst. I am a Grants Compliance Specialist with the Division of Grants Compliance and Oversight. And we will be providing policy updates and recent updates on NIH system processes. I'd like to introduce my colleagues, Kasima and Carrie. Kasima, if you'd like to, introduce yourself.

Kasima Garst: Hi, everyone. My name is Kasima Garst. I'm a Systems Policy Analyst within OPERA's Division of Grants Systems Integration.

Brian Sass-Hurst: And Carrie?

Carrie Mitchell: Hi, I'm Carrie Mitchell. I'm an Assistant Grants Policy Officer in the Division of Grants Policy of OPERA.

Brian Sass-Hurst: Great, thanks. And I will be doing the moderation for this session, so let's start off with some budget news. Carrie, can you please walk us through some information about FY '23?

Carrie Mitchell: Sure! If we could move to the .. . Thank you. On December 29th of 2022, President Biden signed the Consolidated Appropriations Act of 2023 into law. We've included the link here, if you'd like to refer to that. NIH is currently issuing several important fiscal policy Guide Notices that came from that Appropriations Act. The FY 2023 Salary Cap has been announced. It is currently now set to $212,100. That Notice was released January 13th of this year. And to be published very soon are Guide Notices explaining what legislative mandates are in effect for FY 2023 as well as the FY 2023 NRSA Stipend Levels.

Brian Sass-Hurst: Great, so now for some policy updates. Carrie, what's up first?

Carrie Mitchell: Sure! The updated NIH GPS, or Grants Policy Statement, was published in December of 2023 and is now available on NIH's website along with a significant changes table. Previous versions of the GPS remain applicable as standard terms and conditions of award for all grants and cooperative agreements with budget periods that began prior to October 1st of 2022. NIH will continue to publish any interim grants policy changes or clarifications by issuing Guide Notices, which can be found on the NIH Guide to Grants and Contracts website linked on the slide. New for this year, NIH published a Federal Register Notice to announce the availability of the updated GPS and a significant changes table to the scientific community and other stakeholders. Any future updates to the GPS will be posted in the Federal Register prior to implementing those updates.

Brian Sass-Hurst: Great, thanks, Carrie. So moving on to a subject I know everyone has heard a lot about recently, commitment transparency. Carrie, can you talk a little bit about the intent of these commitment transparency updates?

Carrie Mitchell: Yes. Last year, NIH issued a Guide Notice clarifying the requirements for submitting other support. Our overall goal in clarifying this policy is to facilitate transparency and reporting of all research activities both domestic and foreign, not merely financial. NIH has been working with our federal-wide partners to ensure to the best of our ability that the requirements are aligned not only with each other but with all federal implementation guidance that has been issued.

Brian Sass-Hurst: And so what should applicants and recipients know about these requirements, Carrie?

Carrie Mitchell: They should become with the new required format pages, the use of electronic signatures, and the submission of any supporting documentation in line with what's described in the Guide Notice and in the updated GPS. I do want to note that NIH work closely with the Office of Science and Technology Policy on the National Security Presidential Memorandum -33 implementation guidance that was issued last year, and our other support implementation does align closely with that guidance. I'd also want recipients and applicants to be familiar with the appropriate formatting because not using the appropriate formats may cause NIH to withdraw an application from or delay consideration for funding. All research endeavors should be disclosed regardless of the form version being used. And finally, NIH has extensive FAQs on this topic, including some recently updated questions, and we also have a central mailbox for questions on this policy that we have linked on the slide.

Brian Sass-Hurst: Thanks, Carrie. So the Consolidated Appropriations Act signed into law on March 15th of last year included some requirements around recipient institutions notifying the NIH director when they remove or discipline certain individuals due to concerns about harassment, bullying, retaliation or hostile working conditions. Has NIH implemented any new policies addressing these requirements, Carrie?

Carrie Mitchell: Yes, we have. We published the Guide Notice you see on the slide, NOT-OD-22-129, and recipient institutions are required to notify NIH which individuals identified as the PD or PI or other senior and key personnel in the NIH Notice of Award are removed from their position or otherwise disciplined by the recipient institution due to concerns about harassment, bullying, retaliation or hostile working conditions. The authorized organization representative must notify NIH through a dedicated web form within 30 days of the removal or disciplinary action. I want to be clear that this disclosure requirement does not replace any existing requirements to obtain prior approval for any significant change in the status of the PD, PI or other senior and key personnel specifically named in the Notice of Award.

Brian Sass-Hurst: Okay, and so, Carrie, what should recipients do if they have questions about this requirement?

Carrie Mitchell: Yeah, so I've included some additional resources in links on the slide, if recipients want more information on things like how NIH addresses institutional notifications, NIH's commitment to support a safe and respectful workplace, or reporting allegations of a harassment which would include sexual harassment, discrimination and other forms of inappropriate behavior that can result in a hostile work environment. They can also of course email our Division of Grants Policy in-box with any questions. And that email is going to be provided at the end-of-the-presentation slides.

Brian Sass-Hurst: Thank you. So it's my understanding that there's a new policy going .. . that just went into effect as it relates to data management and sharing. Carrie, can you tell us about the new Data Management and Sharing Policy and when it went into effect?

Carrie Mitchell: Yes, we implemented the new Data Management and Sharing, or DMS, Policy effective for all grant applications that are submitted on or after January 25th of 2023, so just last week. This new policy is comprehensive. The purpose of the policy is to promote the management and sharing of scientific data generated under NIH-funded or NIH-conducted research. Under this policy, we expect that investigators and institutions plan and budget for the managing and sharing of data, they submit a DMS Plan for review when they apply for funding and then comply with the approved DMS Plan. NIH expects there will be a potential impact on recipients as a result of implementing this policy, and we've taken several steps to reduce the administrative burden, such as peer reviewers not reviewing or scoring the DMS Plan unless it is integral to the project design and tied to a scored review criterion, and also permitting applicants to revise their plan as needed through the Just-in-Time process prior to the award. As a reference, applicants can look at the Data Management and Sharing Policy overview, FAQs as well as recommended optional DMS Plan format. There are resources available regarding the DMS Plan, and you can find more information on the NIH Scientific Data Sharing website. The FAQs I just mentioned. You can also communicate via email to sharing@nih.gov, and listen to a webinar series. And we've linked all of those resources on this slide.

Brian Sass-Hurst: Great. Thanks, Carrie. Moving on, natural disasters. We all understand that natural disasters can occur, and considering recent hurricanes and other disasters, is there any information available for applicants and recipients for .. . of NIH funding and the NIH Natural Disaster Policies?

Carrie Mitchell: Yes. NIH wants to ensure the safety and well-being of people and animals. We know recent disasters such as Hurricanes Fiona and Ian and recent flooding in Alaska have phenomenally impacted people, places and things, and we just want to reaffirm our stance of helping the extramural community conduct the research that it does. So NIH has issued several Guide Notices this fiscal year to make applicants and recipients aware of the various flexibilities currently available due to a number of these natural disasters. This includes a reminder of our Natural Disaster Policy which identifies actions to relieve short-term administrative, financial management and audit requirements without compromising accountability requirements. I'd encourage everyone to refer to the slide deck or the list of Guide Notices for more information on specific flexibilities available. But I did just want to highlight that some of these flexibilities shown on the screen, that were announced by OMB, will end March 23rd of 2023. So I would just encourage everyone to become familiar with those flexibilities available. And then for additional general information, I would recommend the Extramural Response to Natural Disasters web page that we've also linked onto this slide.

Brian Sass-Hurst: Thanks, Carrie. So switching gears a little bit, NIH recently issued a Guide Notice regarding Non-Discrimination Legal Requirements for NIH recipients. So, Carrie, can you offer any details on that notice?

Carrie Mitchell: Sure! The Guide Notice provides the responsibilities for grant and cooperative agreement recipients administering their awards in compliance with federal civil rights laws that prohibit discrimination. I want to be very clear that these requirements are not new for recipients. It's just that we've updated language in our Notice of Funding Opportunities, or NOFOs, and our Notice of Awards to reflect these requirements. Again, I encourage recipients to read the Guide Notice for full details, but I did highlight on this slide and the next couple of slides what recipients can expect to see in those NOFOs and Notices of Award as a new term and condition. So all new notices .. . Excuse me, all new Notice of Awards will now include this language shown on the slide in Section 3, explaining what recipients must do to comply with the requirements. And then finally, recipients will see this language in the Administrative Terms Section in all new NIH NOFOs, Notice of Funding Opportunities, and in Section 3 for the Notice of Awards.

Brian Sass-Hurst: Great. So my last policy question for you, Carrie, is around the SBIR and STTR programs. So have these programs been reauthorized?

Carrie Mitchell: Yes, they have. On September 30th of 2022, Congress passed Public Law 117-183, which is also known as the Small Business Innovation Research and Small Business Technology Transfer Extension Act, or the SBIR/STTR Extension Act. This reauthorized the SBIR/STTR Program and Pilot Program under the Small Business Act, and key provisions for Small Business Concerns, or SBCs as some people might refer to them, it defines applicant submission requirements and criteria for restricting awards and requiring repayment. Also, federal agencies are now required to assess an SBC applicant's foreign affiliation. That's currently assessed through the Other Support at the researcher level. NIH will be issuing new policy guidance for these requirements over the next several months, but did want everyone to be aware of that reauthorization of those programs.

Brian Sass-Hurst: Thanks.

Carrie Mitchell: Thanks, Brian. I want to give you, Brian, a moment to share an update from our compliance team regarding the transition of iEdison from the NIH eRA system to N.I.S.T. or NIST. Brian, can you tell us about this update to iEdison?

Brian Sass-Hurst: Yeah! So iEdison, which was developed and maintained by NIH since 1995, recently transitioned to NIST under the Department of Commerce in August of this year. So a quick overview of this slide, a few highlights: You can subscribe to NIST for the latest email updates on the redesigned iEdison including multiple training webinars. You can attend NIST training sessions online, and one important thing to note is that access to the new iEdison system requires a login.gov account. If you don't have one, you can create one by going to login.gov, and use the same email address you have for your existing iEdison account to ensure that there's a linkage between your existing and your new iEdison accounts. And then using login.gov is going to ensure an extra layer of security through two-factor authentication. And a friendly reminder, there will be no changes to the longstanding NIH requirements for invention and patent recording under the Bayn-Dole Act as incorporated by reference as a term and condition of every NIH Grant Award. The only change is the new iEdison system interface and associated login.gov requirements for access. And you can refer to the Grants Policy Statement for specific and mentioned reporting requirements.

Carrie Mitchell: Thank you, Brian.

Brian Sass-Hurst: Thank you. So transitioning now for some systems process updates, Kasima, I have heard that NIH has transitioned to new application form versions. Is that correct?

Kasima Garst: Yes! So some of you may remember that we transitioned to FORMS-G in 2022. This was primarily driven by the federally-wide mandated transition from the DUNS to the new Unique Entity Identifier, or UEI. Now NIH has implemented another forms transition for FORMS-H.

Brian Sass-Hurst: So, Kasima, can you tell us more about when this change went into effect and why NIH transitioned to FORMS-H?

Kasima Garst: Absolutely, so FORMS-H is required for application submission for due dates on or after January 25th, 2023, so I believe that was last Wednesday at the time of this recording. This transition was necessary for the implementation of our new 2023 NIH Data Management and Sharing Policy that Carrie referred to earlier. The FORMS-H application guide instructions were posted in October, October 25th, and the FORMS-H application forms packages have been posted to all active NIH Notice of Funding Opportunities. On this slide we have outlined some of the key changes for the implementation of FORMS-H, primarily the addition of the four forms noted on the slide, adding the Other Plans single attachment field. This is where applicants that are required to submit a Data Management and Sharing Plan will attach their plan. We also linked on the slide a high-level summary for more information. On this next slide here we have an example of what the Other Plans attachment looks like on the PHS 398 plan form.

Brian Sass-Hurst: Great, thanks, Kasima. And so next, Kasima, if you could, touch on FFR submission in PMS.

Kasima Garst: Absolutely. As you may recall, as part of an HHS mandate, NIH transitioned to submitting FFRs from the eRA Commons to the Payment Management System, or PMS, on January 1st of 2021. This was part of a two-phase process, first creating a single point of entry for FFR submission via PMS, and then the second to remove the requirement for the quarterly Federal Cash Transaction Report, or FCTR. We know that many recipients have previously reported significant errors and challenges with this transition. And as a result, in addition to providing leniency as appropriate, NIH has requested that PMS relax some of those validations that were impacting final FFR submission by converting those final FFRs to Interim Annual reports until that FCTR requirement was removed. As of April 1st of 2022, recipients are no longer required to submit the Federal Cash Transaction Report, and as a result of this completion of phase two, NIH final FFRs will no longer be converted to Interim Annual reports. Instead, PMS will prepopulate the Cash Transaction sections so lines 10A through 10C on the FFR using recipient real-time cash expense information from PMS and adjust the recipient-reported disbursements to equal cash advance drawdowns on all non-closed sub-accounts. PMS system validations will now also prevent the submission of final FFRs that are not reconciled, so please make sure that you complete those drawdowns in a timely manner so that you can submit your final FFRs.

Brian Sass-Hurst: Thank you. So, Kasima, speaking of FFR submission, is it true that OPERA has set up a new FFR Service Center?

Kasima Garst: Yes, that's correct. So this past August NIH and OPERA established a central Federal Financial Report, or FFR, and Financial Closeout Service Center under OPERA. This center will address and prevent financial drawdowns .. . overdraws, excuse me, by recipients and encourage recipients to complete those drawdowns and reconcile before submitting those FFRs to NIH.

Brian Sass-Hurst: So, Kasima, what exactly will this center do?

Kasima Garst: Great question. So this new center, in addition to receiving, reviewing and reconciling annual and final FFRs submitted to NIH including some FFR process improvements to coordinate those reviews with NIH ICs in order to minimize errors on those reports, but they're also going to assist in submitting those closing transactions, those O59 transactions within PMS, as part of the final FFR reconciliation and Financial Closeout processing. They're also going to be reviewing our Fellowship awards after the termination notice has been received and then submitting the closing transactions to PMS for those sub-accounts since FFRs are not required for Fellowships. So on this next slide we wanted to highlight some of the new central email inbox that was set up for this new team in the center. Recipients can send any inquiries related to FFR submission and processing and Financial Closeout to the in-box on the slide. There are also some helpful links to existing resources that are related to FFRs, such as NIH Grants Policy Statement resources, the Grants and Funding Closeout web page and Grants Closeout frequently asked questions. On this next slide we are also going to highlight some of the relevant contact information for recipients. If you have any technical system support needs related to FFR submission or PMS-related issues, the main thing that we wanted to highlight for everybody on this slide is that because the data that is creating the FFR is originating within eRA systems, we do recommend that recipients reach out to the eRA Service Desk first when they encounter technical issues to help sort of do that initial triaging and determine whether it is something that eRA would have to maybe push updated data to PMS first. So we highly encourage you to reach out to the eRA Service Desk if you encounter technical issues.

Brian Sass-Hurst: Great, thanks, Kasima. So another system process update we issued relates to requests for a drawdown outside of liquidation period. NIH grant recipients have a 120-day liquidation period following the project period end date, and after 120 days PMS systems prevent automatic payment approval. Is that right, Kasima?

Kasima Garst: That's correct. This is to allow time for final payments and reconciliation before recipients submit those final financial reports. The PMS system prevents automatic approval of payment requires once the liquidation period has ended for a document or PMS sub-account.

Brian Sass-Hurst: And so, Kasima, can you tell us about the new process we've laid out for recipients once that period has ended?

Kasima Garst: Absolutely. As a friendly reminder, recipients must submit timely and accurate grant expenditure reports and reconcile those drawdowns in PMS and submit payments to PMS up to 120 days past the period of performance end date for a PMS sub-account. In rare circumstances where recipients are unable to complete their drawdowns in a timely manner, the recipient must first submit a prior approval request to the awarding IC Grants Management Specialist with the required information that is outlined on the slide and within the linked Guide Notice before submitting the payment request in PMS. The IC will then review the request and determine the adequacy of the justification and will notify the recipient if the request is approved. After approval from the awarding IC, the recipient may then submit the payment request within PMS. And at the same time, concurrently the awarding IC will also be communicating the approval to OPERA's new financial close .. . FFR and Financial Closeout Center team, who will coordinate the agency approval with PMS as the recipient requests payment.

Brian Sass-Hurst: Great, thank you. I understand there is some new functionality deployed for administrative supplements. Can you tell us more about that?

Kasima Garst: Yes! So as you all may be familiar, the application viewing window provides 2 full business days after application submission for organizations to check that the assembled application image is appearing as expected prior to the application moving forward for further agency processing, of course before the due date. If additional changes are needed within this window, an organization signing official can reject that application and submit a corrected application again before the due date. The new functionality will offer the ability to bypass this 2-day viewing window and expedite the submission process for administrative supplement applications. This is new functionality that became effective in October, and we've highlighted some of the features on the slide. The main thing that we want to highlight for everybody is that organizations really must carefully review the applications prior to using this verified function within the eRA Commons status screens to mitigate any need for resubmissions.

Brian Sass-Hurst: Great, that sounds great. Can you share where recipients can go for more information on the new functionality and how it works?

Kasima Garst: Yes, of course! So you can reference the Guide Notice that was provided on the slide as well as the link to the eRA Commons online help. And of course, as always, if you have any technical issues, you can reach out to the eRA Service Desk.

Brian Sass-Hurst: Great, and so our last system process update is regarding the system recipients use to administer research training, career development, Fellowships and research education awards. Kasima, can you tell us about those changes coming to xTrain?

Kasima Garst: Yes! So for those who may not be familiar, the eRA xTrain module allows recipients and agency staff to manage and process appointments, reappointments, amendments and termination notices electronically. It also tracks the status and timing of training actions. eRA is in the process of redesigning and modernizing the xTrain module, and that's going to be coming soon. These updates are going to include new visual appearance in .. . That aligns with other eRA modules that have been updated recently as well as added security and stability of the technology for the module. There's also going to be some streamlined workflows and other aspects and enhancements that are going to make it a more user-friendly interface, so a lot of new details are going to come about that, and look forward to seeing a Guide Notice outlining that information soon.

Brian Sass-Hurst: Thank you. So before closing up we wanted to provide some reminders related to HHS and fed-wide systems that will be affecting NIH applicants and recipients. We have recently heard of challenges, yeah, the community may be facing with sam.gov registration and renewals recently. Kasima, can you tell us more about that?

Kasima Garst: Yes, so as part of the federal-wide transition from the DUNS to the UEI, the GSA implemented a new process in SAM to validate entities as the first step to requesting a UEI and for completing SAM.gov entity registration. Due to the high demands that were put on their systems in this new process, the GSA has experienced delays in the SAM registration process used to update and renew this entity registration. Under normal circumstances the NIH late application policy does not allow late submission due to failure to complete and renew required registrations. However, due to these challenges NIH has made an exception to the late application policy until the issue is resolved. Currently, if an applicant entity does not have a current SAM registration at the time of application submission due date, NIH will accept those late applications within the 2-week late window, as long as the entity has submitted all the required documentation and referenced the delays in the cover letter of the application. More information is obviously detailed on the slide and within the Guide Notice, but we do want to remind everybody that the key thing to keep in mind is that organizations that do not have an active SAM registration cannot be issued an NIH award.

Brian Sass-Hurst: Great, thank you. So this concludes the Substantive Update portion of our presentation today. I'm going to turn it over to Carrie to address some standing updates and conclude the presentation for us.

Carrie Mitchell: Thanks, Brian. I know we want to allow time for some questions and answers, so I'm going to ask attendees to refer to our slide deck for any standing policy reminders on things like reporting and the closeout of awards, and we've also included a number of slides with our contact information and a number of helpful NIH resources. With that, I will conclude this part of our presentation, and we'll open it up for some audience questions.

Brian Sass-Hurst: So looking at some of the questions we've received, I do .. . Let's see. So here's one. With the rising costs for products and personnel as well as the higher salary cap, are there plans to increase the budget caps for RO1 grants that would not require an advanced approval?

Carrie Mitchell: I will take that one. I am not aware of any current plans to update the budget caps. That's definitely something we can take back to NIH and discuss, and of course if any of those budget caps change, we would widely publicize and distribute that through our usual channels of Guide Notices and other large communications from NIH to make sure all of our recipients and potential applicants are aware of those changes.

Brian Sass-Hurst: Thanks, Carrie. We also have a question about Biosketches. This person asks. They're wondering if NIH takes into account the admin burden needed to address changes in things like the order of previous positions on a Biosketch and weighs it against whether the change really brings major improvement to the process. This person says that the across-the-board approach to NIH forms and policy updates would be appreciated by admin teams and institutions.

Kasima Garst: Yeah, I'll jump in and take this one a little bit. My team helps coordinate our OMB clearance approvals and those efforts. We want to first say that we greatly do take into account the administrative burden that is placed on our applicant and recipient community regarding the various requirements that have to be implemented as part of applying for an continuous reporting on .. . Progress reporting on our NIH grant applications and awards. Sometimes there are different requirements that are driven by regulatory and other departmental and federal wide efforts that we do have to implement. And we try to find the best ways that we can to provide system solutions and other means to help minimize some of that burden, such as the implementation of the availability of the NIH Biosketch electronically within SciENcv and the ongoing pilot with the federal demonstration partnership looking at the Data Management and Sharing Plan formats. So we are always looking for ways that we can reduce that burden while also meeting the requirements both by policy and the compliance needs related to the different requirements that we have to implement. But certainly we also always welcome feedback from the applicant and the recipients' communities related to those efforts, and we utilize forums like this and FDP and other methods in order to get that feedback. So we also always welcome feedback from the extramural community.

Brian Sass-Hurst: And, Kasima, I heard you mention SciENcv, and that actually matches another question we received, which this person asked, "Will you be requiring the use of SciENcv for Biosketches like NSF is implementing this year?"

Kasima Garst: That's a great question. At this time, NIH does not have plans to roll out that implementation and the requirement of SciENcv, but we are certainly evaluating that as we work to further align with interagency and federal-wide efforts for the Other Support and Biosketch requirements such as interagency efforts towards a common form for those items. But we of course would always communicate out in advance of any implementation requirements via Guide Notice and with all of these different outreach opportunities to give plenty of advanced notice and testing opportunities for the .. . our applicant community.

Brian Sass-Hurst: Great. And it seems like there's a lot of questions about Other Support, so here's another one for you. This person says, "We often have issues with Other Support signatures not being able to be collated due to the signature." And so they have to go through a long loop around to combine it all into one PDF, and they want to know, "Are there any options or workarounds?"

Kasima Garst: At this .. .

Carrie Mitchell: Yeah .. .

Kasima Garst: Oh, go ahead, Carrie.

Carrie Mitchell: Go ahead. No, Kasima, go ahead.

Kasima Garst: I was just going to say from the technical perspective, at this time we do not have any specific workarounds other than the requirement and the flattening of those PDFs. However, we know that the eRA Service Desk has certainly assisted many recipients with the .. . and applicants with the submission of their Just-in-Time with that Other Support information. So if you run into any technical challenges, please feel free to reach out to the eRA Service Desk.

Carrie Mitchell: Thanks, Kasima. I just also wanted to add I saw a couple of questions regarding the kind of systems people need to use to obtain those electronic signatures on their documents for Other Support and Biosketch and just wanted to point out NIH has not required a particular system. I know someone specifically mentioned their organization has issues with the Adobe signature process, so just wanted to put it out there that you're not required to use any particular system. So if you find one that provides that electronic signature for you, that should be fine, and also if you have not the technical issues that Kasima was just talking about, but if you have questions about specifically what needs to be included in your Other Support or how to format some of that information, you can reach out to our Other Support mailbox. It's at nihosbiosketch@nih.gov, and we're happy to answer those questions that can be fairly specific to what your institution is trying to .. . or what your PI is trying to put on those forms.

Brian Sass-Hurst: Thanks, Carrie. I see a few questions here that have come in about DMS Plans specifically around costs and budgeting. So a few folks had said that when you load the DMS in the Other Plan file, it requires that you add a budget or else it shows an error. And so what if a PI doesn't want a budget line item for the DMS? Should they put a zero? And then other folks have said when NIH staff see a $0 budget for Data Management and Sharing Costs, they wonder if that's going to raise concerns or red flags that could negatively impact the likelihood that a proposal would be funded.

Kasima Garst: Those are great questions. So we do outline in the application guide that when you are required to enter the Data Management and Sharing Costs that you would enter the value or $0 if appropriate, and then you would just explain in your budget justification the line item that you required and the amount. So particularly if, for example, if your .. . The cost might be covered under your F&A, then specifying that and of course the $0 then would be appropriate, so rest assured that that line item in particular with the $0 is not going to penalize your ability to be funded. We just need to be able to see specifically whether or not you are requesting direct costs specific to those Data Management and Sharing Costs.

Brian Sass-Hurst: Thank you. And I see we only have about 5 minutes left, but I .. . Another question on Data Management and Sharing is, does NIH expect organizations to absorb the ongoing costs of meeting these requirements once a grant it terminated? Or will it allow organizations to project those costs and potentially prepay them?

Carrie Mitchell: I'll jump in and answer this one, Kasima. So NIH does expect if you're planning to continue Data Management Sharing for that research data after the end of the award period, that would be sort of preplanned and included in your plan and in your budget amount and then paid for or .. . Kasima, jump in if you have better wording than what I'm saying, but it would mean that costs that are incurred and paid for during the project period. So if you know in advance that you want to share that data for X number of years past the end of your project period, you would need to include that in your current .. . in the application budget and in the plan and then pay for it during the life of the award. And I know there's a number of Data Management and Sharing questions that I've seen pop up. I just wanted to sort of put in a plug for the DMS website that NIH has that we mentioned in the slides. It has a lot of information explaining exactly how you can go through budgeting for your DMS Plan, how to write the plan, all kinds of questions about what might be included in it, and they're also available to answer any of your specific questions related to the DMS Plan. There's also going to be a Data Management and Sharing session during this conference, so I would encourage you to attend that or view the recording of that, if possible, to get all the information you can on that policy and the plans.

Brian Sass-Hurst: Great. Another question on the Data Management and Sharing and is .. . One person asks if someone could describe the differences between a Resource Sharing Plan and a DMS Plan?

Kasima Garst: That's a great question. I can take that one from an application instruction perspective. So as you all may be aware, the previous Data Management and Sharing Plan requirements were part of that Resource Sharing Plan attachment that was provided in applications. So effectively what we have done was separate out the Data Management and Sharing Plan attachment and requirement into that new Other Plans attachment. However, anything else that would have normally been required in the Resource Sharing Plan attachments such as sharing of model organisms or .. . I believe there's also a sharing tools or web tools. I forget the name of it, but it is located within the application guide. So anything else that would have normally been required for the Resource Sharing Plan attachment, that still remains. It's only the Data Management and Sharing Plan that is part of this separate attachment. And I think .. .

Brian Sass-Hurst: Terrific.

Kasima Garst: In this last minute, I'll also just highlight for everybody I know there were a few repeated questions of the same. I did provide typed responses for your questions related to some of the progress reporting and budget forms and things, so please check that out because I know we're running out of time. And of course, as Carrie mentioned, there is the Data Management and Sharing session, and we will continue to be updating our FAQs and other web resources related to Data Management and Sharing, Other Support resources and all of those areas.

Brian Sass-Hurst: Great, thank you. So I think we have time for one last question. I will do a pretty quick one. So this person asks, "Can annual cost of living increases be included in the budget for salaries?" They note that they believe AHRQ has a notice that it's not allowed, but they don't recall seeing this sort of notice for NIH.

Carrie Mitchell: That one I would have to look up. I think I know the answer, but I don't want to give anyone wrong information, so let me look that one up. Unless you know, Kasima or Brian?

Kasima Garst: I am not familiar with that one myself, no.

Carrie Mitchell: All right.

Kasima Garst: I'd have to look that up as well.

Brian Sass-Hurst: Same. I suppose probably your IC Grants Management Specialist would be a great point of contact for that, or you can email one of the email addresses on people's screens. But there's 1 minute left, and we don't want to make anyone late to their next session. So we want to say thank you very much for your time. There are .. . A reminder that we had a survey that should pop up. Please fill it out, and hope everyone enjoys the rest of this conference. And, yeah, we would say thank you, and if you have any questions, please reach out to the Grant Events email at nihgrantevents@nih.gov. So thank you and have a great day.