Notice of Award Arrives … Now What?

Session Transcript: 2022-2023 Grants Conference

Cynthia Dwyer: My name is Cynthia Dwyer. I'm the coordinator of the NIH Grants Conference this year and so pleased to also serve as your moderator. I'm honored to introduce our presenters for this session, ah, "Your Notice of Award Arrives .. . NOW WHAT?" So I'd like to first introduce you to Dr. Desirée Salazar. She is our Program Director from the National Heart, Lung, and Blood Institute at NHLBI, and I also want to introduce you to Ms. Kristen Williams. She's a Grants Management Specialist also at NHLBI. So I'm going to go ahead and turn this over to Kristen Williams. Thank you.

Kristen Williams: Hi, everyone. So today we're going to be talking about a few different topics. First, we'll talk about the Notice of Award. We'll discuss prior approvals. We'll also discuss reporting requirements, and we will end on closeout procedures. So to begin with Notice of Award, so what is a Notice of Award Letter? So a Notice of Award Letter is the official document that's issued to our grantees to inform them that their grant has been actually award. It contains all the details regarding the terms and conditions associated with that award, and it provides supporting documentation for the grantee to move forward with their financial obligations. So in 2020, actually our Notice of Award received a face-lift, or the first page did, and that was done in part because of HHS's initiative to standardize Notice of Award across its various platforms. Here you'll see a link associated with that particular change as well as our link to our Notice of Award Web page.

So there are actually four components of the Notice of Award. In Section I, you're going to find your award data as well as your fiscal-year information. In Section II, you find your grant-payment information and the Office of Inspector General Hotline information. So for our payment information, all of our grant payments are made through DHHS's Payment Management System, commonly called PMS. If you have any questions in regard to PMS, please make sure you direct them to PMS via this link. Also, this link will show you you're able to download forms and forms [Indistinct]. So for the Inspector General, here's the Inspector General Office's information. I do want to stress that any correspondence that you have with this office is kept confidential, as well as if you desire, you can submit your information anonymously. So Section III, so these are standard terms and conditions that are found in this section. Now these are the terms and conditions that are applicable to our awards across the board, things such as information on the Appropriations Act, information on legislation and regulations, even the Grants Policy Statement. You'll also find information that might be a little bit more specific to your award. So maybe your carryover designation as well as your Streamlined Noncompeting Award Process, commonly called SNAP. That designation is found here as well. So in Section IV, here are specific terms and conditions. So these are your terms and conditions that are more so associated with your specific IC, a specific grant mechanism or a specific action that's actually occurring with award. So if you have a revision that's being issued to you, if there are cooperative agreement terms or restriction terms or even minimum-effort terms maybe associated with this award, you'll find all of that information here. You're also going to find your staff contact information, whether it is your program or your Grants Management staff contact information, and it also shares some budgetary information not only on your current year but on your out years. So NIH considers that a award has been accepted by our grantee when our grantees have spent down at least $1 in PMS. So once that is done, we do expect that our grantees abide by the rules and regulations that are spelled out in the terms and conditions of the award.

So now we're going to move on to our prior approvals. So a prior approval is a NIH requirement that a grantee must have prior consent before moving forward with a action or incurring a certain financial cost. So here's a pretty comprehensive list of a lot of the prior approvals that we have processed. For the purposes of this presentation, we're just going to focus on the ones that are highlighted in red. Please feel free in your spare time to go to the NIH Grants Policy Statement, and you will find not only this list but others that are included. So there are two ways to submit your prior approval request. You could submit your request via the Prior Approval Module, or you could submit your request in writing via email. Now if you submit your requests in writing via email, please make sure you include all the relevant details, so information such as the grant number, the PI name, contact information as well as providing information that's specifically tailored to that particular request. Additionally, please make sure, especially when your request is submitted in writing, that this is being forwarded to us by an AOR. This is the only way that that request will be deemed official. So please also make sure that when you are submitting your prior approvals that you do this in a timely fashion so it could give us as NIH staff a chance to process the request and get our answer back to you before you take action. Lastly, your answer in regard to the request, whether it is approved or whether it's denied, that answer can only come from a Grants Management official. So if you have received some type of correspondence, whether it is with some other member of NHLBI or any other IC that does not fall under the Grants Management Office, please, please, please make sure you follow up with your appropriate Grants Management official. So here are a few of the prior approvals that fall under the status of PI category, so things like whether a PI will be absent for a prolonged period of time, whether a PI withdraws from a project or a PI is added to a project, reduction in effort and whether we change a model from a multi-PI award to a single-PI award or vice versa. All of these require NIH prior approval. Also, change in recipient organizations, this is commonly referred to as a transfer, so for our transfer prior approvals, we do require that the original recipient and the potential new institution work together to provide a actual prior-approval package. So the original institution needs to make sure that they submit documentation such as the Relinquishing Statement, the Final Invention and Certification Statement and the Federal Financial Report. The new institution needs to make sure they provide the transfer application. Once these documents have been received, the program officer and the GMS, Grants Management official, work together to assess whether this transfer will have any negative impact on the progress to make sure that there's no issues with the resources or environment of the new institution, that this doesn't impact the availability of expertise or just in general have any problems that might come up due to the transfer. Please make sure you contact your NIH staff as early as possible even if it's just to put them on alert essentially about a transfer because these often take a long time to process. Also, once a decision is reached, especially if it's approval, what happens is the Notice of Award is revised for old institution, and funds are deobligated, and a new Notice of Award is issued to the new institution obligating funds to them. So here is for the category of scope, so any changes in the scope of a project requires prior approval, and here are just variety of examples of things that could fall under that category. Also, here's another common prior approval we see, a carryover of unobligated balances. Now I do want to say that, for carryovers, this is only applicable for awards that do not have carryover authority. So if your award does have carryover authority, you can have access to those prior-year funds without requesting the access from NIH. So for submitting a carryover request, you want to make sure that you have a strong justification and also that you have submitted your Financial Federal Report on time .. . or Financial Report .. . I'm sorry .. . on time because that is actually a part of our review process. Also, when you are submitting your carryover or considering submitting a carryover request, please make sure that there is a true financial need for these prior-year funds. If your issue or concern can be addressed via rebudgeting, please, please, please make sure you do so. The expectation, if we do approve the prior-approval request, is that you fully expend these carryover funds in the period that has been requested. So here's a great example of that logic. No-cost extensions. So our grantees for most of our grant mechanisms are allowed to request up to 12 months for a extended period of time up to 12 months without prior approval. This can be done on their end via eRA Commons. However, if you are requesting extension beyond that time, you must request for prior approval. You need to make sure that you have a strong explanation as to why your progress has not been sufficient to be completed in the period of time allotted as well as making sure there's a scientific rationale for continuing the project. Lastly, please make sure that you have remaining funds available to support you during this period of extended time. Lastly, any time that NIH awards additional funding, we do so with administrative supplement. These are program reviewed, and they worked to enhance the scope or add value to the parent grant. Here's the complete listing of a variety of administrative supplements and administrative supplement programs that we have awarded. I do want to note that not all ICs issue all administrative supplements that are listed here, so please make sure you keep it in mind when you're researching about this opportunity. So now I'm going to pass this on to my colleague, Dr. Salazar.

M.A. Dr. Desirée Salazar, Ph.D.: Hello, everyone. So next, I'm going to talk about the reporting requirements. Okay, so we .. . There are two different types of reporting requirements. There are annual reporting requirements for each year that the award is active, and then there's closeout reporting, so I'm going to talk about each of these in more detail. So first, you are required to report on inventions and patents, and this is part of a congressional requirement from the Bayh-Dole Act of 1980. So if any inventions arise from your NIH-funded grant work, you are required to submit that through the IEdison.gov website. Additionally, the Federal Financial Report, or FFR, is required to be submitted through the Payment Management System, and this will reflect the funds that were expended during the budget period. And as we'll talk about later, this will be really important for any carryover requests for any non-SNAP awards. Additionally, we also require federal cash transaction reporting via the Payment Management System, and the deadlines for when that is due depending upon the quarter of your award is shown here. Additionally, we also require that institutions submit financial conflict of interest information. It's required that all investigators be free from bias or any conflicting financial interest, and the institution has to certify that that's the case. If there is a financial conflict of interest, that needs to be reported as well as the plans for managing that financial conflict of interest. Additionally, institutions who receive more than $750,000 in federal awards are also required to undergo audit reporting, so depending upon the institution type that you're at, government, nonprofit or for-profit, there are different policies and procedures for complying with the audit reporting.

Okay, and next we're going to focus quite a bit on the Research Performance Progress Report, or RPPR, and this is a very important part of your award reporting. Okay, so RPPRs are submitted through the eRA Commons website, so you'll want to get to know that website. It will pre-populate your face pages for this, and this is really essential reporting. So the RPPR comes in three different flavors, so one, there's your Annual RPPR. And this is used to demonstrate your scientific progress over the year, report any significant changes and plans for the upcoming year. And I assure you that both Program and Grants Management staff do read the RPPRs each and every year, so this is a very important part to us, so please do complete these in a timely manner and with all the information. At the end of your award period, say you had a 4-year R01, you would be submitting a Final RPPR, which has some additional components, and this is part of the grant closeout process. In the event that you say your 4-year R01 is ending but you are applying for competing Type 2 renewal application, then you would submit an interim RPPR, and so depending upon the outcome of your Type 2 application, this could either serve as the Annual RPPR if the Type 2 renewal application is successful, and if not, it will serve as your Final RPPR, so it requests all the relevant information so that it could be used in either case. And so I saw some questions in the chat a little bit about SNAP versus non-SNAP awards, so the SNAP is the Streamlined Noncompeting Award Process. And in general, most K awards and R awards with the exception of R35 fall into this category. So these applications have automatic carryover authority, so you can carry over funds that are not spent from year to year. In contrast, the non-SNAP awards, which in general include our Institutional Training Grants, the Ts, the cooperative agreements, Us, Ps, some of our SBIR, STTR awards as well as clinical trials and R35 fall into this category and, being non-Streamline, require some additional information. So these applications in the RPPR will require a detailed budget request. They also require submission of an annual FFR, Federal Financial Report, and these awards do not have carryover authority. This will require prior approval. And the FFR must be both submitted and accepted before we're able to consider those requests. Okay, so again, for the SNAP awards, those are a little bit simplified. No detailed budgets are required. FFR is due at the very end, and you have automatic carryover authority. But we do want to see any changes in other support, so if you have a new grant that could potentially have scientific overlap, this is the place to report that. ,And I did see a question in the chat. In some cases, there may be a loss of funds if those awards are overlapping, since you cannot receive funds from multiple grants for the same work. You'd also report any changes in level of effort that are more .. . that are significant, more than 25 percent. And then any anticipated, unobligated balance. So unobligated balance is really just the money that you have not spent or do not intend to spend, so it hasn't been obligated to specific personnel, equipment, supplies, et cetera. So that's the money that you anticipate not spending at the end of a budget year. And if it's 25 percent or more of the award, then we'll want .. . you'll want to alert us and tell us what your plan is to spend that money in the next fiscal year, in the next budget year. We don't want to see funds just building up over time, so you have to share with us what your plan is to spend those funds and to keep the research project on track. The RPPR is also used to comply with the NIH Public Access Policy. So this is the policy in which, once you have peer-reviewed manuscripts accepted, they must be submitted to the National Library of Medicine's PubMed Central and be made publicly available within a year of publication, so it's really important to list all your publications citing the grant in the previous year, and there's no need to wait for the RPPR to do this. You can update your PubMed Central account whenever your manuscripts are published. Okay, and in contrast, the non-SNAP awards, again, require some more detailed information: budget, justification, updated other support, things like IRB and IACUC approvals. And again, we still want you to address any significant planned unobligated balances or nonspending of funds, and these awards will also require the Annual FFR. Okay, and a key thing, so Kristen talked a lot about prior approval requests, and I just want to emphasize that these should not be submitted within the RPPR. These are separate administrative actions, and you want to submit these on their own so they can receive the attention that they need and be processed in a timely manner.

Okay. Lastly, we'll talk about the closeout process. So at the end of your award, so you had a 4-year R01. You're required to submit some final reports that contribute to the closeout process, so the Final Federal Financial Report, the Final Invention Statement and the Final RPPR, or the Interim RPPR in the event that you have applied for a renew of 2-year award. And then after 180 days, the award will enter unilateral closeout, so you want to make sure you have everything in, in a timely manner. And for the Final Federal Financial Report, it's really important that this is submitted on time and that it is accurate and there is no discrepancies with the FFR cash-transaction data within the Payment Management System. So if there's issues, it could result in nonpayment and the institution having a federal debt, so it's really important that this is done in a timely manner and that it's accurate and no discrepancies between those two reports. And this slide here just shows a number of notices about the new Final Federal Financial Report and how it is submitted, so you'll have this on the slides. Additionally, there is a Final Invention Statement and Certification of whether any inventions or patents occurred as a result of your research. And then one of the .. . another unique thing in the final RPPR is that we want to see the project outcomes. And the project outcomes is a very important part of the Final RPPR. This is a section that really should be a concise summary or abstract of the findings of your award written in lay language for the general public. So this will be made publicly available. It will be in the NIH RePORTER. So we really want you to make this accessible to the public. It's part of our government-transparency goals, and so you really want to write this at the eighth-grade level without using scientific jargon. Anyone can look at it. We want .. . Hopefully your congresspeople would be able to read this and understand the work you did, so this is a very important part of the Final RPPR. And lastly, here are some links. The slides are already posted, so you can go back to where you joined, find the slides. There's a lot of links available throughout the presentation, and we're happy to answer questions. Thank you very much.

Cynthia Dwyer: Hi there. Thank you very much, Kristen and Desirée. We greatly appreciate it. That's a lot of information, a lot of good policy links in there as well. So we've had quite a few questions come in, and I know as we continue on we're going to see even more. So I did say we were going to use those upvoted questions to .. . at least to kick this off, so our most requested question has to do with budgeting. Says, "If a PI needs to move expenses from one line item of their budget to another, do they need prior approval? In other words, can they move a certain percentage of their award from line item to line item?" So would that be Desirée? Would you want to address that one?

Kristen Williams: I can answer this one.

Cynthia Dwyer: Oh, perfect. Kristen, thank you.

Kristen Williams: So it really depends. So we do have grant mechanisms where funds are restricted, and so, in those cases, you obviously can't move funds from one line item to another. But in many of our cases if it is not deemed significant rebudgeting, and usually our threshold for that is about 25 percent of the total cost in a particular category, then we usually will allow that with no prior approval from us. Now again, if it does fall in that category where it is deemed significant rebudgeting or if it's a restricted .. . sorry .. . category, then of course that is something that does not fall under that [Indistinct].

M.A. Dr. Desirée Salazar, Ph.D.: Yeah, some of the training awards in particular have certain designated categories that cannot be moved around, so you'll want to always reach out to your Grants Management Staff and program officials, and they can help determine what works for your award.

Cynthia Dwyer: Excellent. All right. So I'm going to ask you a question about prior approval. Do we need prior approval for a change in PI of a subrecipient even if the sub-PI wasn't named in the Notice of Award?

Kristen Williams: Oh, that's a great question. So if the subrecipient's PI was not named in the Notice of Award, meaning they weren't listed as another PI or as a key personnel, then, no, you don't need our prior approval for that.

Cynthia Dwyer: Okay. Great. All right. So this is a question I know a lot of people asked, and if there's a change in institution, how long does a change in institution usually take after the new institution submits an application?

Kristen Williams: Wow, so that is a very hard question to answer because a lot of times for our change-of-institution request, it involves a lot of documentation being in place. So a lot of times you need your approvals for your research subjects in place. You need to make sure you have all your other supporting documentation ready to go as well as you need to make sure your budget, there's no issues or complications with your budget, and a lot of times I've seen in practice that there's a lot of kinda back and forth trying to gather all of that documentation, and that tends to make the process last a little bit longer. I will say that we strive to have all of our prior approvals really completed within a decent amount of time, so most places say a month or so, but I will say the change of institutions, they tend to be the most challenging, and they often take sometimes up to several months to fully be processed.

Cynthia Dwyer: Excellent. Thank you, Kristen. Got some great questions in here that I know apply to many .. . going to be very informative to many of you. Does change of effort greater than 25 percent prior-approval requirement .. . Can it be submitted via the Annual RPPR, or should it be submitted outside of the Annual RPPR?

Kristen Williams: So I would say, just like Dr. Salazar said in their .. . in the presentation, that if you do have a prior approval that coincides with that submission of the Annual RPPR, please submit that request separately. Yeah. But you can also .. . There .. . I believe there is a section in the RPPR that does ask you to note if there's any change as well, so it can be noted there, but please make sure you follow up regarding that prior-approval request.

Cynthia Dwyer: And for those who just tuned in or tuned in a little bit late, what is an RPPR?

Kristen Williams: Desirée, you want to take that, or you want me to take that?

M.A. Dr. Desirée Salazar, Ph.D.: Yeah. Yeah, that's a Research Performance Progress Report. So that's the annual reporting where you'll share your scientific progress as well as various budget and personnel-related information and plans for the subsequent year.

Cynthia Dwyer: Okay. Great. This is an interesting question too. Could you discuss the difference between an unobligated and an unliquidated balance? What's the difference between the two?

Kristen Williams: That is a really good question. I think in the most layman's way of explaining it. So for your unobligated balance, you're talking about your funds that you have not expended. They have not been set aside to be expended, but they .. . At this point, they are just kind of, I guess, in a way left over. There's been no really decisions made on those funds, and then you have your kind of unliquidated funds, which are funds that you might have already kind of earmarked, but they have not been spent yet. So a good example of this is with our training grant program, a lot of times, our training grants when they submit their Federal Financial Reports, they'll have unliquidated funds because they have to earmark certain funds for their stipend payments. It's a requirement. They know they have to do that. But it may not have been spent down yet because this report has been submitted prior to those particular trainings needed to be paid. So that might be a good example to kind of explain that difference but great question.

Cynthia Dwyer: Okay. Great. I'm skipping around a little bit. I'm sorry. I'm not grouping all of these together, but there's just so many great questions out there. Is the RPPR .. . We're going back to RPPR. Is the RPPR done semi-annual and annual, or how often would someone be required to submit the RPPR?

M.A. Dr. Desirée Salazar, Ph.D.: That is annual. I've seen some cooperative agreements, sometimes additional reporting is required on progress, but the RPPR is annually.

Cynthia Dwyer: Okay, so we've got a question about no-cost extension. I see a lot of acronyms in these questions, and so some of you who are brand-new to this are probably going, "What is .. . What do these mean?" But on NCE, no-cost extension, do we need to request approval for carryover if it's greater than 25 percent for a no-cost extension?

Kristen Williams: So in circumstances where you do not have carryover authority, you always need to ask for approval for carryover, so even if you are in a no-cost-extension period or if you're actually asking for carryover during the original life span of the grant.

Cynthia Dwyer: Okay. Great. All right. So here's a question, a little bit more detailed. On Fs and Ks, mentors are listed as key personnel. If they have had a change in active support in the reporting period, is another support required? This person has received conflicting guidance. Some say, "Yes." Some say, "Only the PI." So can either of you answer that? No?

Kristen Williams: So what .. .

Cynthia Dwyer: I thought this might be a .. . This one might throw a curve. Let's see what we can get from it.

Kristen Williams: So unfortunately what I will say about this is, this is .. . kind of comes down maybe to different ICs have different practices. It is always a very good practice, especially for our fellowships and our career awards, to inform your NIH staff contacts about any changes in mentors. However, I will say, if there is .. . For NHLBI, if there is an effort change for the mentor, we do not usually require that that be provided to us in a prior approval. Now we do require if the effort change means that the mentor is leaving the award or there's a new mentor coming to replace this person, but if it's just some variance, we usually do not. But like I said, that's something that I am sure is just .. . I see specific in terms of the practices, so I'm sorry if that doesn't help.

Cynthia Dwyer: No, you know what, Kristen? You brought up a really good point. We have 27 different institutes, centers, 24 fund awards. So really we're giving you some advice and some guidance, but you .. . On that Notice of Award, you have your grants management specialist, your program officer. You need to be reaching out if you have questions for that very reason that Kristen was given .. . giving a while ago is that sometimes each institute or center, they have .. . handle things a little .. . some .. . There are some differences and with some of the types of mechanisms that are awarded, so definitely reach out. We hope this guidance helps, but the ultimate answer is going to come from that institute or center that funded the award. So we had a couple questions actually about Notices of Award, and when would they actually see a Notice of Award? Going to throw out one that's a little bit easier than some of the curves I've been throwing.

Kristen Williams: So in terms of .. . Well, you'll see your Notice of Award when the actual competing application has been reviewed and approved for funding, so I will always say make sure you're in contact with your grants management specialist because they usually can give you a better timeline if you are concerned that, oh, I saw in the system that it's pending and seems to be taking a longer time than I expected. A lot of times, that might be due to maybe some type of pending review over some documentation or some .. . maybe a office practice that has things on hold at the moment, or you just might, like I said, need to just reach out to your grants management specialist, make sure they're aware, hey, I'm still here, and again, they can give you an update on the status.

Cynthia Dwyer: Okay. Great. All right. So we only have about 1 minute left for .. . so maybe one final question. We do get .. . We do have quite a few that are related to the no-cost extensions. This one says, "If we're in the final year of a multiyear award and request a no-cost extension after the due date of what would be an Annual RPPR, what report is due, and when would they need to submit it?"

Kristen Williams: So I want to make sure I'm understanding this correctly, so .. .

Cynthia Dwyer: They're in the final year of a multiyear award.

Kristen Williams: .. . your final year .. .

Cynthia Dwyer: And they request a no-cost extension.

Kristen Williams: Let's say after.

Cynthia Dwyer: It sounds like it's a little bit .. .

Kristen Williams: Okay.

Cynthia Dwyer: It's later than they should have requested one.

Kristen Williams: Okay, so obviously ideally please submit your no-cost extension request while your grant is still active. However, if you are beyond that period, usually you just submit the prior approval to your grants management specialist. They can let you know if this is something they can still move forward with in terms of their review of it. As stated, I believe in the presentation .. . I believe it did have a list of different requirements for the no-cost extension. So you will not necessarily need an additional RPPR, but you probably will need to have explained your progress and the justification of that prior-approval request. Now, at the end of that period as Desirée had stated, you're going to have to still provide those final documents associated with closing out the award.

Cynthia Dwyer: Great. Well, I want to thank both of our presenters. You're very informative today. And we had, as we expected, a lot of questions that came in, and so we're hoping that this at least helps some of you get some of yours answered. But I wanted to also mention that, during the conference, that we do have booths where you can go and you can ask a grants management officer. You can ask a program officer many of the questions that you were asking today. So I'm going to remind you about that in just a moment, but I did want to say thank you to our presenters and thank you to all of you for joining.