Waddayawannaknow? Ask a GMO!

>> Kristin Ta: Okay, so it looks like folks are starting to filter in. So we'll go ahead and get started. Welcome to What Do You Want to Know? Ask Achieve GMO. Today, we have a panel of five of our chief grants management officers from across NIH. I'm Kristin Ta. I'm a Senior Advisor in our NIH Office of Policy for Extramural Research Administration in the Office of the Director at NIH, and I'm just going to have our panelists introduce themselves. Erik, do you want to start?

>> Erik Edgerston: Sure. Hi, my name is Erik Edgerton. I'm the Chief Grants Management Officer for the Arthritis Musculoskeletal and Skin Diseases Institute. I've been a GMO for ... I'm relatively fresh on the job. I've been one of the newer GMOs, but I've been here at NIH for about 15 years, so some time under my belt, but I have a relatively fresh perspective as a GMO.

>> Kristin Ta: Okay, how about Grace?

>> Grace Olascoaga:Hi. Hi, there. My name is Grace Olascoaga. I'm the Chief Grants Management Officer of the National Institute of General Medical Sciences, and I've been at NIH and working in grants management for over 25 years.

>> Kristin Ta: Great, thanks. Dede.

>> DeDe Rutberg:Hi. So I'm Dede Rutberg, and I'm the Chief Grants Management Officer for the National Institute of Dental and Craniofacial Research. I've been doing grants management and I was a grantor for about 19 years and as a grantee for about 4 years prior to that, and I've been a Chief GMO for about 5 years.

>> Kristin Ta: Great, thanks. Samantha.

>> Samantha Tempchin: Hi, I'm Samantha Tempchin. I'm the Chief Grants Management Officer at the National Library of Medicine. I've been at NLM as the Chief GMO for just over 2 years. Before that, I worked with Kristin at OPERA, and I worked with Dede at NIDCR, and I was also at NIAID. So I'm happy to be with you all here today.

>> Kristin Ta: Great, and, Crystal.

>> Crystal Wolfrey: Hi, everybody. My name is Crystal Wolfrey. I think they put me on here because I'm old. So I am the Chief Grants Management Officer for the National Cancer Institute. I've been the Chief GMO for 8 years, and sadly, amazingly I've been in grants management for 34 years, but I started when I was 5. So I'm very young.

>> Kristin Ta: Awesome, and so just for all of our participants, this session is going to be Q and A. So if you have questions that you want us to talk about or address, type them in the Q and A box, and I'll read them out to our panel. We will do our best to get through as many as we can in the time that we have today. So if you can go ahead and start answering those questions, we'll tackle them, and try to use the Q and A rather than the chat just so we have all the questions in one place. Okay, so we'll start off with some questions about other support, and I'm going to preface this by saying I know there are lots of questions about other support. We have a whole session coming up tomorrow about commitment transparency. So while we can definitely touch on a few of these today, I would really encourage everybody to attend that session, where we're going to be going through all of those areas in a lot more detail. I don't want to steal all the thunder away from this session just with topics about other support. So to start, we'll go with, "So for other support, is it total cost, and if so, why is not direct support for the total years of the award?" So for other support, one of the things that's really been emphasized at the federal-wide level is the need for disclosure of all research support. And so in developing updated other support guidance for not only NIH, but across the federal government, the guidance has really been that we need to be capturing all funds that are made available, and that includes indirect cost. So that's why we have that shift from just the direct cost to the total costs. So I'm going to skip past a couple of these other support ones for now just so we can get through a few other topics. So here's another one, "What do you recommend if we talk to a PO over the phone to ask for our grant to be reviewed by a different study section, and they agree to do that, however, it turns out it was never reassigned to the different study section?" Does one of our panelists want to take that one? Kind of a question for a program official, but ...

>> Crystal Wolfrey: So I guess what I would say and others can jump in is that request for a study section is just a request. There's no guarantee that it will be honored, and it's very possible that your program official forwarded that request on, and the Center for Scientific Review decided not to honor that request. So just keep in mind it isn't a guarantee, and even if they say that they will try, it doesn't mean that it will necessarily happen. So I don't really know that I could advise on anything special that you could do about it. But others?

>> Grace Olascoaga:Yeah, I would agree exactly with that, that NIH certainly takes those into consideration, but there may be other factors that were in play, as well, that determined ultimately where the application was referred to.

>> DeDe Rutberg:[Indistinct] put the request in writing with the application and the cover letter, where you can request rather than just relying on a phone call.

>> Kristin Ta: That's a great point. So here's a question about NRSA. "Are we only allowed to compensate GSRs up to NRSA post-doc level zero on all NIH awards?"

>> Crystal Wolfrey: Dede? I defer all ...

>> DeDe Rutberg:I'm sorry. Could you ... I was trying to read the chat at the same time to see the question. Could you repeat the question? I don't see it in the chat.

>> Kristin Ta: Sure, so, yeah, we've gotten a lot of questions. So, "Are we only allowed to compensate GSRs up to NRSA post-doc level zero on all NIH awards?"

>> DeDe Rutberg:That is correct.

>> Kristin Ta: Great. Okay, so, "When is it okay for grantees to extend a restricted supplement with the main grant versus a no-cost extension being required for a supplement?" So I think I might need some clarification on that question. Let's look at the next one about carryover. So, "Can you please elaborate on carryover between an existing award and a renewal? It is permitted in instances where carryover isn't restricted, correct?" So carryover between an existing award to its renewal.

>> Grace Olascoaga:It may depend on the type of award. There are certain mechanisms that don't allow carryover just on the basis of the nature of the award, but for a regular research grant, if the funds themselves are not restricted, generally carryover is permitted.

>> Crystal Wolfrey: Yeah, I would say if the grant has automatic carryover, that automatic carryover extends into the renewal, as well. I think that's kind of what they were getting at and what kind of Grace was. So if the grant does not have automatic carryover, carryover is possible, but it would still require prior approval, even into the renewal.

>> Kristin Ta: Mm-hmm, and kind of a related question that was right below it is, "Can you advise when we can expect the carry forward approval which was submitted as part of the RPPR? When should we follow up?"

>> Samantha Tempchin: So that's an interesting question because it depends whether your grant has automatic carryover authority or not. If you look in section three of your Notice of Award, it'll specify if you're required to request prior approval before carrying over funds that were not spent in 1 year into the next year of the grant. So if that's the case, and you have that automatic carryover authority, you're not actually asking NIH for permission prior to doing that in between years of the award. However, if your grant does not have automatic carryover authority, and you're required to submit a prior approval request, that needs to be done separately from the RPPR. The RPPR is not the place to request that carryover. You would have to submit a request under separate cover, and there's specific information that's required as part of a carryover request. That can also be done electronically through the prior approval module, if you want to do it that way. But definitely contact your grants management specialist if you're having trouble determining whether you have that automatic carryover or not.

>> Crystal Wolfrey: And I would say how fast it happens is very IC specific. So in my IC, we won't, generally speaking, approve a carryover without an FFR, unless it's really an emergency situation.

>> Samantha Tempchin: Same.

>> Crystal Wolfrey: If you submitted it with the RPPR or the day after you submitted the RPPR, until that final FFR is submitted and that award is closed out from the last budget period, we generally speaking won't do a carryover, at least for us.

>> DeDe Rutberg:Yeah, I agree, same thing at my institute. You have to be up to date and compliant with all required forms and timely with it.

>> Erik Edgerston: I would also just say if you submit a request, and it's been what you would consider an unreasonable amount of time, if it's been a week or 2 and you've heard nothing, by all means reach out to the specialist, and if you're not getting a response, we all have websites, and you should be able to find the team leader or branch lead or the chief and escalate that request. Because if you're not getting a response, we want to know about it.

>> Kristin Ta: Yeah, that's a great point, Erik. Here's one about fellowship payments. "Do fellowship payments need to be 12 equal payments, or does the awarded amount just need to be disbursed within the budget period?" Anyone want to jump in?

>> Crystal Wolfrey: I can't answer, if that was your question. I'm sorry.

>> DeDe Rutberg:I'm just trying to think of a situation.

>> [Indistinct]

>> DeDe Rutberg:I'm just trying to think of a situation where they wouldn't ... why your stipends wouldn't be ...

>> Grace Olascoaga:Right, I think generally we would expect it to be at a constant rate throughout the year, even if broken down monthly, but ultimately, depending on whether you're supplementing the stipend with other sources of support, I suppose it's possible that the accounting might work out differently.

>> Samantha Tempchin: It could be differently if they're not just asking about the stipend and perhaps the tuition payments, as well. That might not ...

>> DeDe Rutberg:For travel, or travel.

>> Samantha Tempchin: That could be.

>> DeDe Rutberg:Yeah, so I think that that would allow for variability. You don't have travel, you don't spend your tuition over 12 months. You spend it at one time. I think that would be expected. So if it's anything outside of that, like stipend should be equal payments, I would think, and then the cost should be as you incur them, that you're obligating them.

>> Grace Olascoaga:Right, I would say, right, if somebody were early terminating at less than 12 months for that final budget period, generally we do look to see that what you're reporting equates to an approximate proration of the stipend amount.

>> Kristin Ta: Great. So here's one about Just In Time. "When you receive a good score, an automatic request for Just in Time is generated. We advise our PIs not to respond to that request, to wait until the Grants Management specialist gets in touch and makes the request. What do you recommend?"

>> Erik Edgerston: So that's a little bit of a tricky one. So there is the automated notification that goes out, and I think it goes out to something like the 30th percentile, or it's some ridiculously high level that it's unlikely an application will be funded at that level. What I will say is it's useful to have some of this information already in. That expedites our ability to get an award out the door once a funding decision has been made. But generally it does make sense to wait until you hear from a specialist or somebody in the institute to submit those, because the information could go out of date by the time we're able to make funding decision, at which point we'll have to ask you to resubmit those materials again to make an award. It also depends a little bit about the time of the year, if it's sort of towards the end of the fiscal year. There's a pretty good chance that we would be able to get the award out, and if it's a reasonable score, and you can look at most of our websites and see what our pay lines are for our RPG awards. You can probably make a pretty informed guess about whether to submit the documents now or wait until someone reaches out to you.

>> Crystal Wolfrey: Yeah, so I agree with a lot of what you said, Erik, but from an IC that gets so many applications and funds so many awards, I never advise people to wait until you hear from us. Like you said, most of us publish some fundable range or pay lines or something like that, or if you're not sure, you can always reach out if you want to know if the score is something that could possibly get funded, but if you wait until a specialist calls you to even get started on it, that just delays everything. So we have way too many things that are floating later and later in the fiscal year, and it gets harder and harder for us to manage it. So while I agree the scores are really pretty high that it goes out on, and I also think it goes out really, really early, but once we get into the fiscal year, and you kind of know what round your grant application is going to, and you kind of have a sense that if you scored in the 50th percentile, it's probably not one that's going to get funded, but if you're under 12 that you might want to contact the IC and then get started on preparing that stuff. Because it's really hard for us when everything is waiting and waiting for you guys, for us to just contact you, and then you get started on it. That's my perspective from a really large IC. I don't know if others have it.

>> DeDe Rutberg:Yeah, I'm the same. It's a balance. It's a balance of being prepared and not getting to emotionally invested when you get something that ... The trigger used to be at 40. So I don't know if they dropped it to 30, but it used to be 40. So I just ... and some institutes, just so you know, don't post their pay lines. We don't post pay lines. We post success rates. So just know you may not be able to fund a pay line threshold in some institutes. So I would do exactly what Crystal says. I would reach out if you feel like you've got a decent enough score. So some of it's just experience, knowing and you kind of feel like if you work with one institute for a while, you get familiar with what kind of their pay is and who the players are. It's a little bit of a balance.

>> Kristin Ta: Great. So this one is kind of about the roles of the GMO. So, "My PIs, for the most part, just don't understand when to reach out to the GMO, the PO or both. So can you guys kind of talk about the difference?" Come on.

>> DeDe Rutberg:It's like a therapy session, Kristin.

>> Crystal Wolfrey: All jump at once here, people.

>> Samantha Tempchin: I'll say it's never a bad idea to CC both of us. I like to be kept in the loop, and I know the program officers at my IC do, as well. So what I would say is if you're asking for anything officially, that cannot be done over the phone. Make sure it's in e-mail, it's in writing. If it's an official request, it needs to come from a signing official, and I'm sure those of you that are signing officials are constantly telling your PIs that, but, yeah, I say, "Why not?" It's easy enough to CC someone for both.

>> Crystal Wolfrey: Yeah, I agree, and I kind of advise people if you're talking science, it's strictly a science conversation, there's really no point in looping in the grants management specialist or officer, because we're not going to have that conversation with you. So that is sort of your formal communication line to deal with your science and your project and what you're doing. If you need something from us, then you always want to loop in the grants management officer or the grants management specialist, because we're the only ones who can officially say yes or no. So I would copy that also on those communications, and we do encourage our program officials to loop us in, too, so that we're all working from the same page. So that's sort of my general rule on it.

>> DeDe Rutberg:Yeah, the relationship is a partnership. It's parallel. You kind of have two sides of a house, or arms that manage your grant. You have the business house, administrative house which is more our kind of world, and then you have the program scientific side of it. But often they overlap, and you do need us to do any official decision-making of a no, or go or no-go. For instance, if you're asking for a specific scientific piece of equipment, while it might be allowable, we run your financials, we still need okay and buy-in from the program person that this is scientifically necessary and reasonable and has merit. So I agree with both Crystal and Sam in that it doesn't hurt to e-mail both of us and save you some time of having to re-route it one way or the other and backtrack.

>> Erik Edgerston: One other thing I might say about this, too, is that if you have an investigator or are an investigator and you have a question about something, or you're considering doing something on a grant, always consult your sponsor programs office first. Because while we can tell you what may be allowable under a policy at NIH, you may have institutional policies that will be more restrictive or supersede the guidance that we could give you. So it's always a good option to stop with your sponsor programs office first to get feedback, and then progress to reaching out to Grants Management NIH with prior approval requests or those kinds of questions, if they can't help you.

>> Crystal Wolfrey: I agree. I just want to add one thing for those individuals who are AORs on this call. If a PI comes to you and says that their program director told them they could do something, always reach out to the Grants Management official, because you don't want to go down a road of the program official telling the PI they could do something, doing something and then finding out that it's not something we would approve.

>> Kristin Ta: Great. So here's a question from someone who's interested in pursuing a career in Grants Management. "What advice or programs would you recommend to those trying to get your foot in the door for these types of positions at NIH from a soon-to-be PhD graduate?" I see happy faces. Any advice to share?

>> DeDe Rutberg:Well, I think you're probably starting out on the right foot because you're having some exposure on this end, on the other side of it. I would say basic accounting classes are important, good reasoning. There's some stuff you just learn on the job. It's funny because when I do a lot of these sessions for associations, I always say like, "How many people went to school for Grants Management?" and I've been doing it for 18, 19 years this session, and nobody has ever said, "Oh, me! I grew up and said I wanted to go be a grants manager." So it was just funny how we all get into the career path, but it's been a very satisfying, gratifying one to me. But I think business classes. I took a couple of nontraditional medical and scientific vocabulary classes for the non-scientists, and I actually found that to be very helpful. Not all schools offer them, and I had to go to a local community college, and it was done online, but I thought it was very, very helpful in giving some context for when you do work with these scientific research grants. So those are just some kind of nontraditional things that I found to be helpful along the way, and I'll toss it up to my colleagues to weigh in.

>> Kristin Ta: Looks like they all loved your answer, Dede.

>> Samantha Tempchin: Well, I learned everything that I needed to know from Dede so ...

>> DeDe Rutberg:Oh, gosh, Sam, then you're in trouble!

>> Kristin Ta: So here's one about COVID-19, and I think I can go ahead and take this one. So, "In the beginning of COVID-19, there were some extension dates for a case-by-case basis for certain submissions. Do these still apply, or are all deadlines final?" So back at the beginning of the public health emergency, OMB issued lots of flexibilities for recipients who were both doing COVID research and also were affected by COVID. Those broad flexibilities have all ended, but where we can, NIH is still working to be flexible as much as we can, but that does all have to be done on a case-by-case basis. So there are things that require prior approval, and those can be sent in to your funding IC for consideration. But also it's important to keep in mind that a lot of the flexibilities for things like first no-cost extensions and carryover are flexibilities that we already had in place for our recipients. So you really do only need to come in when it is actually something that requires NIH prior approval. I don't know if you guys are still getting a lot of those types of requests at your ICs, but ...

>> Crystal Wolfrey: I think we will be. I think as the fiscal year ramps back up, there's going to be a whole lot of questions about it, and so we're going to have to deal with everything on a case-by-case. I do think COVID, 2020 was unusual. Getting into 2021 isn't promising to be a whole lot less unusual, in that it's compounding what happened last year. So I think everybody is just going to have to be patient and as flexible as we can be and as open as we can be to all the communications that we're going to get from everybody.

>> Kristin Ta: Great. So, "What determines if an award is covered under SNAP or not?"

>> Samantha Tempchin: I have the grants policy statement up. [Indistinct] just a sec, unless someone else wants to take it.

>> Kristin Ta: So I would just say there are definitely certain things that are never under SNAP. Right? So things that always require annual reporting, things like construction, foreign award ... I can't remember now if all foreign awards fall under SNAP. I'm going to ...

>> Samantha Tempchin: Okay, so, first of all, your Notice of Award will specify. Most K awards, most R awards, except for R35, and non-SBIRs. A lot of times, SBIRs are not under SNAP, centers, cooperative agreements, training grants, some clinical trials. Some ICs do it differently, but that's the basic yes-no, and if for any reason during the project period, if NIH determines that there's a need for closer monitoring of an award, if there is some pattern of things not getting done in the award or some kind of high risk situation, we can always move you from SNAP to non-SNAP, if it's needed.

>> Crystal Wolfrey: Yeah, I agree, and it always says it in the Terms of Awards. So read that first term, it says whether it's under SNAP or not, and then if you're not sure why it is or why it's not, reach out to the grants management specialist and ask the question. It's a great question. [Indistinct] different than what you expect.

>> DeDe Rutberg:That's really important to read the Notice of Grant Award. I know it sounds very simple, but we've run into problems where, on our end, where we accidentally put something out of SNAP that should have been for just because it was overlooked. And it caused a lot of reporting requirements because you have to submit an FFR, and then you need to change it back, and you're doing it. So please, please do your own little checkbox of your Notice of Grant Award and make sure you're screening that.

>> Kristin Ta: Great. So I've seen this question a few times as I've been scrolling through. So I'm going to go ahead and take this one. "How far into year five could the year one carryover approval be requested?" and just kind of in general, folks are asking, "When should carryover requests be submitted?"

>> Crystal Wolfrey: How far into year five should the year one carryover? Is that what the question is?

>> Kristin Ta: Yes. So I'm assuming they mean the type two.

>> Crystal Wolfrey: So I'm going to with this from the perspective it doesn't have automatic carryover. So they have to submit a carryover request. At my institute, at NCI, if a carry forward request has not been submitted by the time we would be looking at that FFR for funding that year ... So in other words, if we're funding the third year, and we're looking at the 01 year FFR, and there's been no carryover request submitted, we automatically use that money as an offset. We don't ... You have a whole year to ask for carryover. If you haven't asked for it in that year, then we just assume that you don't need a carryover, and we use it automatically as an offset. So we don't allow balances to roll forward for years and years and years if there's no carryover request, at least where I work. I don't know how others feel about that.

>> Samantha Tempchin: Yeah, that's not how we do it. We only do that for training grants. We do that for all of our training grants, but for other awards, we don't automatically offset. Offset is always an option, but we don't do it as a routine.

>> DeDe Rutberg:We didn't use to do it. We did it much like Sam just mentioned, but we're trying to move ... We're moving towards the Crystal-NCI approach. We're doing it more and more frequently just as the funding climate and landscape gets a little tighter and tighter. We're having to just rein in a little bit more on those carryovers and offsets. So we are just seeing, at my institute, a little bit more frequency of doing that.

>> Grace Olascoaga:We tend to do it the way Sam mentioned, except for training grants where we will, more likely, use an offset in an off year, but we also tell people to be sure that they have a concrete bona fide need to make that request. I think there are instances where some grantees or PIs think that if they don't just go ahead and request the carryover that the funds will just disappear on them, but we do ask that they think carefully about that and make a thoughtful request. That it's something that's well-justified and concrete that we can make an informed decision about.

>> Crystal Wolfrey: So again, from NCI, if you haven't requested it, the funds do disappear on you. So if I'm going into the third year, and you've had a whole year to request a carryover from year one, we're not going to open the door and say, "Hey, by the way, did you know you had this balance? Do you need to this carryover?" That's just not the way that we do business, and it is a cost containment issue. It's a funding issue. If I allow balances to stay in FFRs and never use them, it possibly one or two more grants that don't get funded this fiscal year because that money is just sitting in somebody's account, and in a place, we just don't ... can't afford to do that. So I guess it is very IC-specific. So again, call your grants management specialist and find out what the policy is there.

>> DeDe Rutberg:Right. And to segue off that, you don't want to be in habit ... We had some grantees and some PIs that just were very financially savvy and conscientious. So there wasn't bad intent, but they would really squirrel away the money in acorns and save and save and save, and when we started taking offsets because they didn't have any reason, they weren't obligated. They just said they were being prudent with their funds and just were saving, saving, saving each year and waiting and waiting and waiting, and it can bite you in the behind. So just be a little bit mindful of that, too, to your PIs. You do. You spend what you need, and you just ask for what you need, when you need it.

>> Kristin Ta: Great. So here's another question about Just In Time. "Can you talk about IRBs and how they impact Just In Time submissions?"

>> Crystal Wolfrey: Erik, you haven't spoken in a while.

>> Erik Edgerston: Yeah, I was kind of thinking about how to ... That's kind of a little bit of an open-ended question in terms of JIT submissions and IRBs. So obviously if it's involving humans, we're going to need an IRB approval date before we can issue it. In some cases, particularly as we get to the end of the fiscal year, and we're running out of time, we will sometimes allow these to go out with a restriction, which will prevent all work involving human subjects until we get that approval date from the IRB, but I'm not quite sure what we're asking or what the question is here in terms of how that affects the JIT. Or is this in terms of timing, or is it more general? Because I would say if you're holding up an entire JIT submission just for the IRB approval, again, I would probably go ahead and submit the other documents and let the specialists know IRB is pending, and that gives them a better option to decide, "What's the time frame here? Should we put this out restricted, or should we hold off until it arrives?" Because there are times it's beneficial to wait, and times it's beneficial to issue that award with the restriction. And we're trying to figure out what's going to be best for the grantee, best for the project and what's going to be sort of the least amount of risk in compliance with grants policy.

>> Samantha Tempchin: Yeah, I agree with Erik on that. Don't hold up your Just In Time submission if you're only waiting for the IRB, and in that case, it can be really helpful if you can reach out to the grants specialist or include a note in your JIT saying when you're expecting the IRB is going to meet to discuss this application. That helps us be able to plan what Erik said, whether we're going to put it out with the restriction or hold it.

>> Crystal Wolfrey: Yeah, and I would add to that we just ... We have a case study like this in the session that I just did. Sometimes you won't have the IRB because the human subjects research isn't scheduled to start until a future year of the project period, which was something that we called delayed start. So if that's the situation, then I would highly recommend getting the rest of the JIT and contacting the specialist and providing a statement that, yes, there's human subjects going to be involved, but it's not going to happen until year two or year three, and then we can move forward with a whole bunch of options on restricted awards and so forth. So I think the question was timing. Don't ... and I also believe in the old days you could only do Just In Time once or whatever, but now I think you can ...

>> DeDe Rutberg:Yeah.

>> Crystal Wolfrey: ... keep modifying and adding more documents. So I would suggest that you have documents ready, submit them in Just In Time so that the specialists can get started reviewing them, and then as soon as the IRB comes through, that award could go out the door. If you wait and hold everything, then it's the whole process starting over again, and if it hasn't come through yet, my message is we're trying to get grants out the door as quickly as we can because we just have too much that slides into the last quarter, and nobody likes that so ...

>> DeDe Rutberg:Yep.

>> Kristin Ta: So here's kind of a more general question. "What tips do you have for grant administrators at the universities? Any tricks or things you frequently see us miss or things you wish we knew?"

>> DeDe Rutberg:Yeah, I have something I wish you guys knew. That we don't actually ... We don't use the Commons. We have a system that interfaces with the Commons. So often I get questions of Commons submission issues or IT issues that they want me to troubleshoot, and I always feel bad redirecting, saying, "Call the help desk," because I don't want people to think I'm just punting and then kicking the can down the road, but we don't have access as staff, other than IT help desk staff. NIH staff does not have access to the Commons the way that you guys have access to the Commons. We have systems that interface with the Commons. So I like to educate people that just so that you guys have understanding that we're not being not sympathetic or empathetic. We just really don't have the technical ability to help you. So I'll stop there.

>> Crystal Wolfrey: No, I agree. I get so many things, and I'm like, "I can't get into it. I don't have that view." I also don't have the same view of some of the other systems that are used. So I get questions about it. But I would say my one thing that I would take away, as a takeaway that I would say to everybody new or ... Inexperienced or experienced as an AOR, and this is what I tell everyone. We are absolutely here to help. We are here to facilitate research. Most of us ... Like I said, I've been doing this for a ridiculous amount of time, and this is my career, and I do it to facilitate science. So anything that I can do to help facilitate science, I am happy to do. So don't feel shy or uncomfortable or anxious about reaching out to us because I think all of us in this room and all of us that work for ... all the staff work for us feel the same way. We would so much rather to help you figure out a way to do something than have to fix something after it's been done the wrong way. So that's my little spiel.

>> DeDe Rutberg:Yeah, well said, Crystal. We really are trying to get to the yes and find a way for something to work. We truly are.

>> Kristin Ta: Great. So here's another question about no-cost extensions. "How many no-cost extensions can you ask for? I heard you can ask for more than one. Is there a limit?" So for most awards, you get your first one kind of as a freebie when you need it. But do you guys want to talk about how many you can get after that? Grace, you haven't said anything in a while. You want to jump in?

>> Grace Olascoaga:Well, it is possible to ask for another extension. And again, like with other prior approval requests, we just ask that you have a well-reasoned explanation for it. At my institute, we typically will ask additional questions about exactly how much money remains or what sorts of support you have and exactly what work remains to be done. And then we'll take that into consideration. There does come a point, though, fiscally, where we run up into some hard limitations where we simply can't continue to extend and push out the project end date, and that's something that a specialist would be able to explain when you're running into that situation. It may vary across institutes, though. I believe some are probably more stringent about looking at a second or third extension request. So again, it's one of the situations where if you're running up against that situation or project running into that, reaching out to a specialist to just ask about how the institute typically handles that.

>> Kristin Ta: Great, and there's kind of a related question in here about prior approval requests. So, "Would you recommend e-mailing prior approval requests or using the ERA Commons Prior Approval module to submit them? What do ICs prefer?"

>> Crystal Wolfrey: I'm going to say, "Please use a Prior Approval system request." You would be amazed how people's in-boxes, especially because we're all working virtually, our in-boxes are out of control, and it's really hard to keep track of stuff. You do it through the Prior Approval module, it's an electronic thing, and many of us have systems that track electronic requests. So if there's a Prior Approval module, whatever you're asking for is in that module, please use that module. It's so much easier than things getting lost.

>> Kristin Ta: Yeah, agreed.

>> Crystal Wolfrey: Also, another point, my management staff monitors my specialist response to Prior Approval requests. When they come in the in-box, I have no idea how long it's been there. If it comes in through the system, then we can track how long it's been there, and we can follow it.

>> DeDe Rutberg:Yes. Yeah, it's centralized. So everyone has access to it, as opposed to someone's e-mail box where, if I'm out sick, nobody else has access to that. So I would definitely say, "Please use a Prior Approval," for your sake and for our sake and for tracking and documentation and timeliness and just transparency. All the way around, it's a win-win.

>> Kristin Ta: So I see a couple questions here asking about when we're going to have FAQs posted about our recent guide notice for PPE. So I can assure you we are working on that. We're a little swamped this week with the virtual seminar, but we do have our FAQs drafted, and so you should be seeing those posted in the next week or 2. So I assure you we are getting to that, and if you have specific questions, I'd recommend visiting our policy booth, and we can answer those questions about that guide notice for you there.

>> Crystal Wolfrey: While you're reading, Kristin, I'm going to put in a plug for all the booths because all of us have them. I know we have some people managing the booth from 12 to 5 every day through the week, and a lot of the other ICs are, as well. So it's so hard. I see 148 Q and As in 45 chats. There's no way we could do that now, but there's a lot of one-on-one sessions, and so please visit the policy booths. We're doing ours in WebEx. You can actually go into a WebEx room with a program director and a grants management specialist, and you can ask questions and all of the ICs are doing it different ways. So [Indistinct] it's great in this virtual environment to do that.

>> Kristin Ta: Yeah, that's a great point. The booths are a really good resource. Okay. Sorry, there's just a lot in here.

>> Crystal Wolfrey: Someday we'll all be in a room again, and you can just yell these questions out.

>> Kristin Ta: I know. So, "If an IHE has a scheduled indirect rate change per their rate agreement at the beginning of an award that's scheduled to go into effect during the award, can we" ... I'm not sure who this question is from. "Can we recognize the new rate, or do we need to stay with the original rate?"

>> Samantha Tempchin: Hard to tell if they're asking about a split rate situation, or if they're talking about they get an entirely new rate agreement in the middle of a project period.

>> Kristin Ta: Mm-hmm.

>> Samantha Tempchin: I guess we kind of sort of ... Splits we see all the time. That's if your rate agreement has two rates in it, it changes on a certain date. If that rate agreement is available at the time of the award, we'll use it and show the split accordingly. If you get a new rate agreement negotiated after a project is already started, there is a whole bunch of specific situations that are enumerated in the grants policy statement. We, for the vast majority of cases, no, we do not change that award, but there's a couple little exceptions in there. So you can always ask the grants management specialist, but most of the time, it's no. The rate carries for the whole project period.

>> Kristin Ta: So here's one about public access. "After the submission of an RPPR, where it was determined that a publication was noncompliant, does the GMO or PO receive confirmation from public access when the issue has been resolved, or does the institution still need to send them the My NCBI PDF report when they've resolved it?"

>> Crystal Wolfrey: So I'll start. So there is a public access center at NIH, and those of us that use the public access center, we don't need to get the My NCBI report from you. We get the notification from the public access center. So they handle all the negotiations and the collection of the evidence of compliance, and they send it to us, and we act on that. So that's how it works for us because we use them. I don't know if others don't use them or ...

>> Samantha Tempchin: That is not how it works for the ones that don't use it. That would be great. We don't use it. So please do send us an updated My NCBI PDF when you get it. And I realize that it's ironic coming from the National Library of Medicine.

>> DeDe Rutberg:I was going say that, Sam, but ... and we apologize for the fact you have to support two different processes based on the IC, but this is NIH. So it's IC specific.

>> Erik Edgerston: And that's another one of those issues that if you submit it and you see that you got a noncompliance message when that goes in, and you're not sure, reach out to the specialist, and they'll tell you who to work with or how that's handled.

>> Kristin Ta: Great, and so we've just got a couple of minutes left. I am just going to put another plug out there for our commitment transparency session that's tomorrow. We'll be talking about the other support and biosketch updates that we're going to be making that we mentioned today in the NIH update. Those will be announced probably next month, in November, and then things will ... The new updated forms will be required likely beginning in January or early next year. So if you have questions about other support in the biosketch, I would really recommend coming to that session. Okay, here's one more about no-cost extensions. So, "If we have a 1-year supplement, and the main grant is extended, the parent grant, can we extend the supplement, too, or do we need to request a separate no-cost extension for the supplement?"

>> Samantha Tempchin: I guess ...

>> Kristin Ta: Anyone?

>> Samantha Tempchin: Sorry, yeah. So I would say normally, yeah, if the parent grant is extended, the supplement is extended with it. But if it's a COVID supplement, was issued with COVID funds, please check with your grants specialist, and you can always check with your grants specialist first because the COVID funds are ... have a lot of extra just different processes associated with them.

>> Kristin Ta: Yeah.

>> DeDe Rutberg:Also if it's a diversity supplement, it may not be automatic, if it's directly related to a person. So if you have a diversity or reentry supplement, it may not automatically be extended.

>> Kristin Ta: Yeah, and that COVID point is a really good one, too, Samantha. I saw a question here that I'm never going to be able to find scrolling back through again, but someone was asking about being able to commingle funds from a COVID supplement with their regular parent award, and if they're a COVID supplemental appropriation, that's definitely not an option. So it is important to read the Notice of Award for your COVID supplements and make sure you're following all of those special terms and conditions. I think that brings us just about to time. I know we didn't get through all of the hundred-and-some questions that we got today, but like Crystal said, there are lots of fantastic booths, and I would really encourage everybody to check those out. I know myself and our OPERA colleagues will be at ours, and I'm sure all of our chiefs will be checking in at their IC booths, as well.

>> DeDe Rutberg:Or you can call us after the visual is over.

>> Crystal Wolfrey: Yep, all of our contact information is out there somewhere. I love answering questions, and so, please, feel free to contact us.

>> DeDe Rutberg:Oh, yeah, I'd much rather you ask.

>> Kristin Ta: Yep, that's always the best approach because the answer is always, "It depends," and, "It's case-by-case." So ...

>> DeDe Rutberg:Right.

>> Crystal Wolfrey: Thanks, Kristin, for reading all of them. I know that had to be a ...

>> DeDe Rutberg:Yes, thank you so much!

>> Kristin Ta: Thank you, guys.

>> Grace Olascoaga:Thank you.

>> Kristin Ta: Thank you, all, for coming.

>> Crystal Wolfrey: Yes, thank everybody. There's ... We have 942 participants. That's a lot. All right. You all have a nice day.

>> DeDe Rutberg:You guys have a good conference.

>> Kristin Ta: All right. Bye, everybody.