

2012 NIH Grants Management Update October 10, 2012

Don Ellis and Pam Clark Grants Management Branch

National Institute of Environmental Health Sciences





2012 NIH FALL UPDATE

- Highlights from the 2012 NIH Fall Update
- Policy Reminders
- Questions and Answers



FY2013 President's Budget

- Requests 30.9 billion for NIH; same as FY2012
- From the HHS FY2013 Budget in Brief:
 - Continued focus on resources for young, first time researchers
 - Continued exclusion of inflationary allowances
 - Reduce non-competing continuation grants by 1% below FY2012 level
 - Manage competing awards to avoid growth in average award size
 - Provide consideration by IC Advisory Councils of awards to PD/PIs with existing grants of \$1.5 million or more in Total Costs



NIH FY 2012 Fiscal Policy for Grant Awards

- FY 2012 Funding Levels: Non-competing awards will be issued without cost of living/inflationary adjustments.
- Inflationary Increases for Future Years: Will be discontinued for all competing and non-competing research grant awards issued in FY 2012.
- Overall effort is to keep average size of grants consistent to the FY2011 levels or lower.
- NRSA / Graduate Students: NIH will implement a two percent increase at all stipend levels.
- Salary Limits: Applies Executive Level II.
- Additional Information: Additional details on Fiscal Operations, including specific funding strategies for ICs will be posted at http://grants.nih.gov/grants/financial/index.htm

More at: <u>NOT-OD-12-036</u>





NIH Salary Cap News

- Prior year awards (awards made in FY 2011, 2010, etc) are not impacted. No adjustments required;
- If the President signs a CR for any part of FY 2013, unless legislative language provides otherwise, the EL-II salary cap will apply regardless of what level was applied in FY 2012;
- Where applicable, grantees will be allowed to rebudget in an effort to accommodate the new salary cap limitations.
- Salary cap does not apply to payments made to consultants under a grant;
- Salary cap does apply to subawards/contracts for substantive work under a NIH grant;
- See Frequently Asked Questions website at http://grants.nih.gov/grants/policy/fy2012_salary_cap_faqs.htm

More at: <u>NOT-OD-12-035</u>





How the NIH Fiscal Policy Impacted Your FY2012 WETP Award

- Your progress report requested budget equaled the Total Cost committed on your FY2011 Notice of Award for this year.
- Out-year commitments will be revised to remove inflation, if applicable.
- Use the Executive Level II Salary Cap (\$179,700) on your budget request.
- Use the 2012 NRSA Guidelines to determine the graduate student compensation limits.



Closing out the Era of ARRA

- Timely Quarterly and Closeout Reports Required
 - All standard closeout documents apply to ARRA funded awards (Final Progress Report, Final Invention Statement, Final FFR), even if ARRA funded a Supplement to a non-ARRA parent;
 - Financial closeout requirements for multiple ARRA supplements: <u>NOT-OD-10-066</u>.

More at: http://www.grants.nih.gov/recovery/





New HHS Policy on Efficient Spending

- New HHS policy modifies grantee use of NIH funds for conferences, meetings, food, promotional items, and printing and publications.
 - Applies to NIH Grants and Cooperative Agreements where the primary purpose of the grant is to support a Conference and/or Scientific Meeting (i.e. R13s and U13s);
- Implications for Grants
 - Effective with awards issued on or after 01/27/12, a new term and condition prohibiting food/meal costs from being supported by or charged to NIH-supported conference grants will be included on all competing and noncompeting NIH R13 and U13 awards: "Direct charges for meals/food and beverages are unallowable charges to this project."
- More at: NOT-OD-12-041 and NOT-OD-12-048





Who to Contact for Grants Information:

- General Application Questions:
 - E-Mail: GrantsInfo@nih.gov
 - Phone: 301-435-0714
- Grants.gov Customer Support:
 - E-Mail: <u>support@grants.gov</u>
 - Webpage: http://grants.gov/
 - Phone: 800-518-4726
- eRA Commons Helpdesk:
 - Webpage: http://ithelpdesk.nih.gov/era/
 - Phone: 301-402-7469 or 800-504-9552

Division of Grants Policy:

- E-Mail: GrantsPolicy@mail.nih.gov
- Phone: 301-435-0949

Division of Grants Compliance & Oversight:

- E-Mail: GrantsCompliance@mail.nih. qov
- Phone: 301-435-0949



POLICY REMINDERS





Due Dates for WETP Program

- BUDGET START DATE
- FFR Due 90 days following the calendar quarter end of the previous budget end date
- Carryover Requests due at least 5 months prior to Budget End Date
- Progress Report Due 60 days prior to Budget End Date (45 days for any awards under eSNAP.)
- BUDGET END DATE





Non-Competing Continuation Progress Reports

- Failure to submit complete and timely progress reports may affect future funding to the organization;
- Non-SNAP annual progress reports are due two months prior to the anniversary date (paper submission);
- SNAP progress reports (e-SNAP) are due 45 days prior to the anniversary date (electronically submitted through eRA Commons eSNAP Module);
- All grantees have access to a searchable list to determine which progress reports are due at: http://era.nih.gov/userreports/pr_due.cfm



Prior Approvals

- Prior Approval Requests must be submitted by an Authorized Institutional Signing Official to the NIEHS Grants Management Specialist.
- The following are some issues that require Prior Approval:
 - Deviations from Award Terms and Conditions (e.g. changing consortium partners)
 - Carryover of Unobligated Balances
 - Change of Scope (e.g. significant rebudgeting of > 25%; change in human subject activities)
 - Reduction of Effort by PI/Key Personnel by 25% or more
 - No-cost Extensions (beyond first 12 months)
- NIEHS tries to respond to all prior approval requests within 30 days of receiving all necessary information from the grantee.





Carryover Requests

A carryover request should include the following:

- A cover letter explaining why there is a balance, and what the intended use of funds is, countersigned by a Signing Official.
- A detailed budget and budget justification for unobligated balance AND requested use of unobligated balance.
 - Levels of effort must be stated for all salary requests
 - Separate budget breakdowns should be provided for each subproject
 - Separate budget breakdowns should be provided for each consortium involved
- A checklist page identifying any requested indirect costs

It may be helpful for you to categorize your unobligated balance and request in the following budget tables.



TABLE 1: BUDGET PERIOD ______ UNOBLIGATED BALANCE ANALYSIS

Category	NGA Award Amount (NA)	Supplements, if applicable (S)	Prior Years Carry-Over (PCO)	Total Awarded (NA+S+PCO)	Total Expenditure	Unobligated Balance	Explanation of Unobligated Balance
Salaries				\$ -		\$ -	
Fringe Benefits				\$ -		\$ -	
Total Personnel	\$0	\$0	\$0	\$0	\$0	\$0	
Consultant				\$ -		\$ -	
Equipment				\$ -		\$ -	
Supplies				\$ -		\$ -	
Travel				-			
Other				<u> </u>		\$ - \$ -	
Consortium A				\$ - \$ -		\$ -	
Consortium B				\$ -		\$ -	
Consortium C				\$ -		\$ -	
Consortium D				\$ -		\$ -	
Total Consortium	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Total Direct Cost		\$0	\$0	\$0	\$0	\$0	
List F&A Rate							
List Base							
Indirect Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
TOTAL		\$0	\$0	\$0	\$0	\$0	





TABLE 2: PROPOSED BUDGET FOR CARRYOVER OF UNOBLIGATED BALANCE FROM BUDGET PERIOD ______ TO BUDGET PERIOD _____

Category	Amount
Salaries & Wages	
Fringe	
Personnel	\$ -
Consultants	\$
Equipment	\$
Supplies	\$
Travel	\$
Other	\$
Consortium Cost	\$ -
Total Direct Costs	\$ -
Indirect Cost	\$ -
list F&A rate & base in box below	
TOTAL	\$ -

formulas

Justification/Explanation





Reasons why Carryover Requests are Rejected:

- The prior year Federal Financial Report (FFR) must be received and approved by NIH first.
- The request was not signed by an authorized institutional signing official.
- Requested costs appear to duplicate costs in the current year's award (e.g. extra salary for someone already at 12 months of effort).
- All carryover funds must be spent in the budget period they are requested (so get your requests in early!)
- Carryover funds must be within the currently approved scope of the grant.
- Carryover requests should only reflect immediate needs (therefore, try to avoid salary for "TBN" positions).



Closeout : Final Reports

Grantees are **strongly encouraged** to submit closeout documents electronically through the eRA Commons!

- Failure to submit timely reports may affect future funding to the organization;
- Documents are due within 90 days of project period end date:
 - Final Federal Financial Report (FFR) SF-425 Expenditure Data (submitted through eRA Commons);
 - Final Inventions Statement & Certification;
 - Final Progress Report;
- Grantees must ensure there are no discrepancies between the final FFR expenditure data (in eRA Commons) and the FFR cash transaction data in the Payment Management System.





Closeout: NIH Centralized Processing Center

- Centralized office accepts receipt of all non-financial, paper-based closeout documents;
 - Final Progress Report;
 - Final Invention Statement and Certification.
- If not using eRA Commons Closeout Module, mail closeout documents to the Central NIH unit at:

NIH Centralized Processing Center 6705 Rockledge Drive, Room 2207, MSC 7987 Bethesda, MD 20892-7987 (for regular or US Postal Service Express mail)

Bethesda, MD 20817 (for other courier/express mail only)





Audit Requirements

All NIH Grantees that expend \$500,000 or more within a year in Federal awards are subject to an audit requirement.

- Audits are due within the earlier of 30 days after receipt of the auditor's report(s) or 9 months after the end of the grantee's audit period.
- Grantees delinquent in submitting audits risk the imposition of sanctions and potential loss of Federal funds.



Grantee Type	Source of Audit Requirement	Where to Submit Audit Reports
State & Local Governments Colleges & Universities Non-Profits Hospitals	OMB Circular A-133 45 CFR Part 74.26	Online to: http://harvester.census.gov/fac/ collect/ddeindex.html Questions: 1-800-253-0696
For-Profits	45 CFR Part 74.26 (d)	HHS Office of Inspector General HHS Office of Audit Services National External Audit Review Center 1100 Walnut Street, Suite 850 Kansas City, MO 64106-2197 Phone: 800-732-0679/816-426-7720
Foreign	NIH GPS, uses 45 CFR Part 74.26(d)	(same as For-Profits)



Questions?

