### Post-Award Administration

An Overview for R15 Investigators



#### Topics to Discuss:

The Notice of Award (NoA) — What is it?

- Reporting What is due & when?
- Prior Approvals Is approval needed to make this change?
- Resources I have more questions!

Final Reminders & Things to Consider

## The Notice of Award (NoA)

What is it?

#### The Notice of Award (NoA) – In Detail!

- NoA is available in the eRA Commons & provides:
  - Grant number, recipient organization, and Principal Investigator(s)
  - Budget Period and Project Period
  - Amount of federal funds provided
  - Terms and conditions
    - Legally binding, so be familiar with what they are!
    - Drawing funds from the award constitutes agreement with the terms
- Multi-Year Funded:
  - Budget period is longer than 12 months in duration
  - R15: all funds are issued in the initial competing award

Your institution's sponsored projects staff will help you navigate the NoA – reach out to them for assistance!

Reporting

What's Due When?

#### Annual Reporting – What's Due & When:

- Annual reports are required to be submitted using the <u>Research</u> <u>Performance Progress Report (RPPR)</u> module in eRA Commons
  - Questions: Change in Other Support? Change in effort for key personnel?
  - Public Access (publications) and Invention Reporting, if applicable
  - No updated IRB or IACUC approvals needed
  - Carryover authority is not applicable for MYF grants
    - However, balances greater than 25% of the current year's award must still be reported on the RPPR
- Due Dates: Multi-Year Funded (MYF) RPPRs are due on or before the anniversary date of the budget/project period start date of the award

#### Other Reporting – What's Due & When:

- Final Federal Financial Report within 120 days of project period end date
- Final Invention Statement and Certification Form within 120 days of project period end date
- Final RPPR within 120 days of project period end date
- Financial Conflict of Interest Reports
  - Any investigator on the award with a significant financial interest that could directly & significantly affect the award

## Prior Approval

Needed or Not?

#### Recipient Authorities – What you can do:

- Standard terms and conditions of award give some authorities to the recipient (i.e. no need for prior approval). This includes (in general):
  - Cost-related changes/rebudgeting unless change in scope
  - Extension of project period without additional funds (up to 12 months)
  - Transfer of work to a 3<sup>rd</sup> party unless change in scope or foreign entity
- Any authority listed in policy can be overridden by any special term on the award and/or specifics listed in the Notice of Funding Opportunity (NOFO)

#### The Rules – What you need prior approval to do:

- The following items <u>do</u> require prior approval, provided by OGA:
  - Addition of a foreign component
  - Pre-award costs more than 90 days ahead of a competing award
  - Change in scope
  - Change in the PI or other key personnel identified in the award
  - Change in recipient organization (i.e. transfer)
  - Extension for more than 12 months
  - Need of additional funding
  - Deviation from award terms and conditions

#### The Requirements – Asking for approval:

- Requests should be submitted via the <u>eRA Prior Approval module</u>
  - If it must be emailed, the AOR must send the request to <u>NCIGrantsPostAward@mail.nih.gov</u> with a cc: to the assigned Program Official
- Submit the request at least 30 days prior to the proposed change
- Provide a scientific and/or budgetary justification for the change
- Approval for any prior approval request must come from the Office of Grants Administration

# Prior Approval: Some Common Examples

#### Change in Key Personnel:

- Change in the PI or key person's status
  - NIH definition of key person PI or PIs (if multiple) and any person named on the award
  - Any change in effort greater 25% from approved level
  - Replacement or absence greater than three continuous months

- Prior Approval Request:
  - Be sure to detail any scientific and budgetary impact in the request
  - If adding new individual, include biosketch and current Other Support
  - If multi-PI, address the leadership plan

#### Change of Recipient Organization:

- Award belongs to the recipient organization and must be relinquished
- New institution needs to submit a Change of Recipient Organization application
- Address any impact to the award because of the change
- Issues that are typically encountered:
  - Late notice of a PI leaving (ex. find out in the RPPR)
  - Late submission of the relinquishing and/or transfer application
  - An associated change in scope of the project
  - Multi-PI situation where the contact PI is moving &/or the proposed new recipient will not be substantially involved in the project

#### Change in Scope:

- Recipient makes the initial determination on significance of change
- Consult with NIH as needed
- The following <u>may</u> indicate a change in scope:
  - Significant rebudgeting of more than 25% of total award
  - Change in use of animals or human subjects research
  - Significant change in key personnel
  - Shift in research emphasis
  - Application of new technology

### Available Resources

I have A LOT more questions...

#### Resources:

- NIH Research Enhancement Award Page <a href="https://grants.nih.gov/grants/funding/r15.htm">https://grants.nih.gov/grants/funding/r15.htm</a>
- eRA Commons Help & Tutorials <a href="https://www.era.nih.gov/help-tutorials/era-commons/user-guide.htm">https://www.era.nih.gov/help-tutorials/era-commons/user-guide.htm</a>
- NIH Grants & Funding Page <a href="https://grants.nih.gov/grants/oer.htm">https://grants.nih.gov/grants/oer.htm</a>
- NCI Grants and Training Page <a href="https://www.cancer.gov/grants-training">https://www.cancer.gov/grants-training</a>
- Office of Laboratory Animal Welfare <a href="https://olaw.nih.gov/">https://olaw.nih.gov/</a>
- Research Involving Human Subjects <a href="https://humansubjects.nih.gov/">https://humansubjects.nih.gov/</a>
- Invention Reporting <a href="https://seed.nih.gov/small-business-funding/small-business-program-basics/grant-policy/ip">https://seed.nih.gov/small-business-funding/small-business-program-basics/grant-policy/ip</a>
- Public Access Policy <a href="https://publicaccess.nih.gov/">https://publicaccess.nih.gov/</a>
- Financial Conflict of Interest Policy <a href="https://grants.nih.gov/grants/policy/coi/index.htm">https://grants.nih.gov/grants/policy/coi/index.htm</a>

## Final Reminders & Things to Consider

Please, Don't Forget!

#### Reminders & Things to Remember:

- Submit timely reports and applications be sure to follow the instructions!
- Stay on top of the requirements (e.g. Public Access and Financial Conflict of Interest)
- Make sure to know your organization's policies and procedures
- Have conversations at the appropriate time with your NCI Program Director about your continuation

- Thank you!
  - Feel free to contact me at <u>Mallory.Shramek@nih.gov</u>



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