Fiscal Management of U54/P20 Budgets

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Office of Grants Administration

What is the Office of Grants Administration (OGA)?

- Manages all NCI business-related activities associated with NCI grants and cooperative agreements

  - Pre-Award - negotiation of budgets, period of performance, etc.

  - Award – determining terms & conditions of award, issuing Notices of Award

  - Post-Award - changes in the project (PI, effort, budget, scope, etc.), answering questions related to the Notice of Award (NoA), the reporting requirements, etc.

- Ensures that all legal, regulatory, and policy requirements are met by NCI and the recipients during all stages of the award process

Grants Management Specialists

- Serve as the primary administrative and policy contact for every award

- Responsible for ensuring all legal requirements, regulations and administrative policies are followed by recipient

- Responsible for maintaining the official grant file

- Average ~190 awards annually

- Grants assigned by institution to improve consistency, customer service, and expertise

- Work very closely with your Program Directors, who review the science side of your research.

Annual Reporting: Research Performance Progress Report (RPPR)

What's Due When?

Annual Progress Reporting:

- Annual reports are required to be submitted using the Research Performance Progress Report (RPPR) module in eRA Common at least 60 days prior to cycle date
  - RPPR Questions:
    - Change in Other Support?
    - Change in effort for key personnel?
    - Unobligated balance greater than 25%?
  - All publications must be compliant with the NIH Public Access Policy
  - **Require detailed budget – please be as detailed as possible and include calculations within your budget justification.**
  - The RPPR Instruction Guide is helpful in completing the forms

Federal Financial Report (FFR)

- Required on an annual basis for non-SNAP awards to report the status of funds and expenditures

- Due no later than 90 days after the calendar quarter in which the budget period ends

- Must be submitted to the Payment Management System via the FFR navigation link in the eRA Commons

Post-Award Issues

What are they? What can be done?

Prior Approval Requests

- *What we do:*
  - Assess whether we can and/or need to accommodate the request

- *What does __not__ need prior approval*
  - Rebudgeting of funds (unless change in scope)
  - Change in Level of Effort for **non-key** personnel
  - Change in third parties (unless adding a foreign component and/or change in scope)

- *What needs prior approval:*
  - Carryover of unobligated balances
  - Change in scope/objectives/aims
  - Change in PI or PI absence ≥ 3 months
  - Reduction in effort ≥ 25% for **key personnel**
  - Change in recipient organization

See section 8.1 of the Grants Policy Statement for additional information

For prior approval requests that cannot be submitted via eRA Commons,
please send them to: NCIGrantsPostAward@nih.gov

Problems with the Research?

- **Best Practice:** Discuss with your Grants Management and Program Directors sooner than later
  - Will greatly aid in future conversations and considerations
  - Asking permission is much better than seeking forgiveness in these circumstances!

Balances and Carryover Requests

What happens if you have a balance?

Carryover of Unobligated Funds

- Carryover is the process by which unobligated funds remaining at the end of a budget period may be carried forward to <u>cover allowable</u> <u>costs in the next budget period.</u>

    - **No automatic carryover authority-** must submit prior approval request for carryover with justifications that match the most recently approved FFR's Unobligated Balance

    - **Reminder -** Rebudgeting is allowed without NCI prior approval (if no more than 25%, no change in scope, and does not include restricted funds)

- **<u>Bona Fide Need Rule</u>** – carryover can only be approved if there is a need for the funds in the current budget period

How and When to Submit an NCI Carryover Request

- **How:** The NIH [eRA Commons](#) Prior Approval module is available for electronic submission of a carryover The eRA Commons video for [Carryover Requests](#) offers step-by-step instructions for using the system to submit requests. Or, NCIGrantsPostAward@nih.gov.

- **When:** Carryover requests should be submitted in a timely manner with enough time in the budget period to complete the work proposed and should be submitted after the Federal Financial Report (FFR) has been submitted and approved.

What to Include in the Carryover Request

- Provide the grant number and PI name

- Note the amount of funds to be carried over (direct and indirect)

- Identify if any funds were restricted

- Provide an explanation for the unobligated balance with supplement breakdown

- Include an expenditure plan with a description of activities to be completed, plans for catch-up of progress, and how those activities relate to the aims of the project

- Give reasons why the work cannot be accomplished through rebudgeting of current budget period funds, especially if there is a large current year balance as well

Justifying the Carryover Request

- When preparing a justification for a carryover request, recipients should consider the following:

  - Why weren't the funds spent in the past year?

  - Budget and scientific justifications:

    - What additional work will be done during the current grant year that is not possible with the current award amount? For example, thought should be given to how the work will be accelerated - will more staff be hired, effort increased, more assays run, etc.?

    - Focus on the scientific progress over the budget – how do you plan to catch up and prevent future delays?

Carryover Justifications Continued

- How will recurring expenses that go beyond the budget period such as supplies and personnel, be paid for in the future?

- Is the request essential? Are costs reasonable, allowable, necessary and in line with the existing budget? Are there new costs that were previously unforeseen? Is anything duplicated in the parent award budget?

- How will the work be impacted if the funds are not approved for carryover?

- Once submitted, the Grants Management Specialist (GMS) and Program Official will review the request. If the request is approved, a revised Notice of Award will reflect the additional authorized fund.

  - If carryover is not approved (or not requested), balance will be used as an offset on a future award

Final Reminders & Things to Consider

Please, Don't Forget!

Things to Remember

- Have ongoing conversations with NCI staff regarding the Program progress/delays

- Be as detailed as possible when submitting requests

- Submit reports on time and requests as early as possible

- Stay on top of your associated requirements and registrations (ex. Public Access, Financial Conflict of Interest, and SAM registration)

- Make sure you know your organization's policies and procedures---Talk to your business office.

- [Prepare for closeout for any projects that are ending – see NIH guidance](#)

Available Resources

A Very Small Sampling…

Resources:

- NIH Grants & Funding Page - https://grants.nih.gov/grants/oer.htm
  - Instructions & Forms Library
  - NIH Grants Policy Statement
  - NIH Guide for Grants & Contracts (FOAs, Policy Notices, etc.)
- NCI Grants and Training Page - https://www.cancer.gov/grants-training
  - Policies and Processes
  - Grant Funding Information (FOAs, Funding Strategy, etc.)
- Office of Laboratory Animal Welfare - https://grants.nih.gov/grants/olaw/olaw.htm
  - Policy Changes & Guide Notices
  - Reporting Noncompliance

Resources, continued:

- Clinical Trial Requirements for Grants and Contracts - https://grants.nih.gov/policy/clinical-trials.htm
    - Policies & Changes
    - Clinicaltrials.gov Registration & Reporting
- Research Involving Human Subjects - https://humansubjects.nih.gov/
    - Regulations, Policies & Guidance
    - Human Subjects Protections Training
- Public Access Policy - https://publicaccess.nih.gov/
    - When & How to Comply
    - Managing Papers & Reporting to NIH

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