NIH Update – NCURA

NIH OFFICE OF POLICY FOR EXTRAMURAL RESEARCH ADMINISTRATION

MARCH 2022



Budget News & Fiscal Policy Updates

- On March 11, 2022, President Biden signed a short-term continuing resolution to fund the government through March 15, 2022.
- NIH maintains several important fiscal policy Guide Notices:
 - NOT-OD-22-076, FY 2022 Salary Cap
 - Effective Jan 2, 2022: \$203,700
 - NOT-OD-21-056, FY 2021 Legislative Mandates
 - NOT-OD-21-049, FY 2021 NRSA Stipend Levels
 - Effective for all FY21 NRSA awards
 - <u>NOT-OD-21-058</u>, Notice of Fiscal Policies in Effect for FY 2021



POLICY UPDATES



Publication of the Revised NIH GPS for Fiscal Year 2022

- Update is applicable to all NIH grants and cooperative agreements with budget periods beginning on or after October 1, 2021.
 - Previous versions of the NIH GPS remain applicable as standard terms and conditions of award for all NIH grants and cooperative agreements with budget periods that began prior to October 1, 2021.

See details: NOT-OD-22-050

 NIH will continue to publish interim grants policy changes and/or clarifications through the issuance of NIH Guide Notices, available <u>here</u>.



Publication of the Revised NIH GPS for Fiscal Year 2022 – Significant Changes Table

- As is standard, <u>a significant changes table</u> was published alongside the GPS update.
 - The full table is linked, with a few highlighted changes below:
 - Language related to updated Other Support and Biosketch requirements and links to instructions and resources were added to Sections 2.3.7.12: Biographical Sketches, 2.5.1: Just-in-Time, and 4.1.10: FCOI.
 - Language about the NRSA Childcare Cost initiative was added to Chapter 11: Ruth L. Kirschstein National Research Service Awards.
 - Clarifying language related to single Institutional Review Board (sIRB) was added to Section 4.1.15.10: NIH Policy on the Use of Single Institutional Review Board.
 - Language was added related to application requirements, enhancing diversity, review, and reporting requirements for Conference Grants in Chapter 14.

See details: <u>NOT-OD-22-050</u> and <u>significant changes table</u>



NRSA Childcare Costs: F's and T's

- NIH began providing childcare support to recipients of NRSA fellowships on April 8, 2021.
 - Applies to full-time NIH-NRSA-supported fellowship positions.
 - Each fellow is eligible to receive \$2,500 per budget period
 - For households where both parents are NRSA fellows, each parent is eligible to receive \$2,500.
- NIH also began providing childcare support to recipients of NRSA training grants awarded (continuation, new, or renewal) in FY 2022.
 - For eligible Training Grants, childcare costs will be provided, unless otherwise specified on the notice of award, based on the number of trainee slots awarded.
 - No additional action is needed on the part of the applicant at the time of application to request these funds.

See details and application instructions for F's: <u>NOT-OD-21-074</u> See details for T's: <u>NOT-OD-21-177</u>

See Frequently Asked Questions: Childcare Cost FAQs



Implementation of Changes to the Biographical Sketch and Other Support Format Page

- NIH expects applicants and recipients to use the updated Biosketch and Other Support format for applications, Just-in-Time (JIT) Reports, and Research Performance Progress Reports (RPPRs)
- As of due dates on or after January 25, 2022, NIH now requires the use of the updated format pages.
 - Effective January 25, 2022, electronic signatures and supporting documentation will be required
 - Failure to follow the appropriate formats on or after January 25, 2022, may cause NIH to withdraw applications from or delay consideration of funding.
- Applicants and recipients remain responsible for disclosing all research endeavors regardless of the version of the forms used

Learn more: <u>NOT-OD-21-110</u> Learn More: <u>Biosketch FAQs</u> & <u>Other</u> <u>Support FAQs</u>



Reminder: Submission Validations for Clinical Trial Registration and Results Reporting

- Recipients will continue to receive an error preventing submission of an RPPR if there are studies involving clinical trials where:
 - Registration is due and no National Clinical Trial (NCT) number has been entered into the Human Subjects and Clinical Trials Information (HSCT) form <u>or</u>
 - Results are due and have not been submitted in <u>ClinicalTrials.gov.</u>
- To address the delinquent registration error, the recipient will be required to:
 - Provide the NCT number issued by <u>ClinicalTrials.gov</u>, or
 - Provide the <u>ClinicalTrials.gov</u> registration receipt that is received upon submission of the trial registration information to <u>ClinicalTrials.gov</u>.
- To address the results reporting error, the recipient will be required to:
 - Submit the trial results information to <u>ClinicalTrials.gov</u> or
 - Provide the ClinicalTrials.gov submission receipt for a (1) Good Cause Extension request or (2) Certification of Delayed Submission of Results Information from ClinicalTrials.gov.
- Detailed language for resolving these warnings can be found at the linked guide notice.







Reminder: FORMS-G Grant Application Forms & Instructions Must be Used for Due Dates On or After January 25, 2022

- Applicants **must** use FORMS-G application packages for due dates on or after January 25, 2022.
 - (see <u>NOT-OD-21-169</u> for details).
- FORMS-G Grant Application Instructions are now posted on the <u>How to</u> <u>Apply - Application Guide</u> page.

See details: NOT-OD-22-018

- All significant changes to form instructions are published.
- FORMS-G application packages have been posted to all active Funding Opportunity Announcements (FOAs).
- NOTE: Application due dates remain unchanged.



Expanding Requirement for eRA Commons IDs to All Senior/Key Personnel

- An eRA Commons ID must be entered in the "Credential, e.g. agency login" field for all personnel listed on the R&R Senior/Key Person Profile (Expanded) Form
- Senior/Key Personnel (NIH defined in <u>NIH GPS 1.2</u>)
 - The PD/PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the grant.
- Applicants will encounter an eRA system validation if the "Credential, e.g. agency login" field is blank or does not contain a valid eRA Commons ID. Currently, this is a warning.



Update – Implementation of Requirement to Submit SF-425/FFR via Payment Management System

- Recipients have reported a significant increase in errors in submitting reports via a single-entry point since January 1.
- The system does not allow recipients to submit reports that do not reconcile expenditure versus quarterly cash transaction data.
- Given the significant impact, agencies will provide leniency, as appropriate, where these challenges prevent recipients from submitting timely FFRs.
 - Notify the Grants Management Official of any delays and retain all documentation related to this flexibility in the event of an audit finding.
- Beginning in March 2021, on behalf of NIH, PMS began converting all NIH Final FFRs to Interim Annual FFRs in order to relax the validations on a weekly basis.
- Recipients should indicate in the Remarks section that this is a Final FFR. The FFRs will be reviewed by NIH OFM staff as Final FFRs.

12



Mandatory Submission of SF-425/FFR via Payment Management System- Points of Contact

- Direct all systems policy inquiries to:
 - NIH Office of Policy for Extramural Research Administration (OPERA) Systems Policy Branch Email: <u>OPERAsystemspolicy@nih.gov</u>
- Direct all eRA systems-related inquiries to:
 - eRA Service Desk Submit a web ticket: <u>https://grants.nih.gov/support/index.html</u> Toll-free: 1-866-504-9552 Phone: 301-402-7469
 - The FFR due date and the data on Lines 1 thru 9 are populated by NIH eRA. If any of this data on the FFR is incorrect, please contact the eRA Service Desk directly.
- Direct all PMS systems-related inquiries to:
 - ONE-DHHS Help Desk Self-Help Web Portal: <u>http://www.psc.gov/one-dhhs</u> Email: <u>PMSSupport@psc.hhs.gov</u> Toll-free: 1-877-614-5533
 - For all inquiries related to Line item 10a Cash Receipts, 10b Cash Disbursements and line item 10d Total Federal Funds Authorized, please contact PMS Helpdesk at 1.877.614.5533 or you can submit a ticket to PMS using the self-service web portal. Please ensure that you provide the Payee Account Number (PAN), PMS Document Number and Sub-account number and provide the details of the issue.
- PMS Training opportunities will be posted at: <u>https://pms.psc.gov/training/gr-ffr-training.html</u>



National Institutes of Health

Learn more: <u>NOT-OD-20-127</u>, <u>NOT-OD-21-046</u>, <u>NOT-OD-21-060</u>,

<u>NOT-OD-21-128</u>, <u>NOT-OD-21-138</u>

Update – Process for Requesting Drawdowns Outside of the Liquidation Period

- Recipients must submit timely, accurate grant expenditure reports, and reconcile all cash transaction reports.
- Recipients may request payments from the Payment Management System (PMS) up to 120 days past the period
 of performance end date of the PMS subaccount.
- In circumstances where recipients are unable to complete drawdowns in a timely manner, the recipient must submit a prior approval request to the IC GMS **BEFORE** to submitting the payment request in PMS.
 - Must provide the PMS subaccount (e.g. award document number), NIH grant number, the amount of funds being
 requested, and a justification for the late payment request. The recipient must also describe what action is being
 taken by the recipient to preclude similar situations in the future.
 - IC will review the request, determine adequacy of the justification, and will notify the recipient if approved.
 - After approval, the recipient may submit the payment request in PMS.
- Requests are reviewed and considered on a case-by-case basis. Recipients remain responsible for ensuring that
 information submitted to NIH in Federal Financial Reports (FFR) is accurate, complete, and consistent with the
 recipient's accounting system (see <u>NIHGPS Section 8.4.1.5.2</u>).
- When submitting the FFR through PMS, the Authorized Organization Representative (AOR) or the individual designated to submit this report on behalf of their institution, certifies that the information in the FFR is correct and complete and that all outlays and obligations are for the purposes set forth in grant documents, and represents a claim to the Federal government.



Update- Adjusted Timeline for Requiring Two-Factor Authentication to Access eRA Modules Using Login.gov or InCommon Federated Accounts

- As of Sept. 15, 2021, eRA users are now required to transition to the use of the two-factor authentication service provider Login.gov.
- Timeline:
 - All PIs and key personnel associated with an application or Research Performance Progress Report (RPPR) are required to transition to the use of two-factor authentication 45 days after the submission of their competing grant application (Type 1 or 2) or their RPPR.
 - This approach currently is only applicable to all <u>scientific account</u> holders but excludes <u>administrative accounts</u> until early-to-mid 2022. (See also <u>eRA Commons User Roles</u>)
- See step-by-step instructions, FAQs, video tutorials and more related to Login.gov at the <u>Access eRA Modules via Login.gov</u> webpage.
- For further information about using an InCommon Federated account see the <u>Access eRA Modules Via an InCommon Federated Account</u> webpage.



HHS AND FED-WIDE SYSTEM UPDATES



Upcoming Change in Federal-wide Unique Entity Identifier Requirements

- In March 2019, the General Services Administration (GSA) announced that the U.S. Government is moving to a new government-owned Unique Entity Identifier (UEI) which will replace the DUN and Bradstreet (D&B) Data Universal Numbering System (DUNS) number in all systems.
- By April 2022, the federal government will stop using DUNS to uniquely identify entities registered in SAM.
- Entities currently registered in SAM will automatically be issued a UEI.



Upcoming Change in Federal-wide Unique Entity Identifier Requirements

- Note: Entities registering prior to April 2022 must still obtain a DUNS prior to SAM registration.
 - March 29, 2022 is the last day to obtain a new DUNS for registering an entity. Starting April 4, 2022, registrants will no longer obtain a DUNS first.
- SAM.gov will be down for maintenance to complete UEI transition beginning on April 1 at 8:00 PM (ET) until no later than 9:00 AM (ET) April 4.
- Beginning April 4, DUNS will no longer be displayed in Integrated Award Environment (IAE) systems or accepted for entity registration.



UEI Implementation

- Mid-FY 2021- All entities registered in SAM were automatically issued a UEI.
 - Note: DUNS still required for new registrants prior to April 2022.
- Beginning October 2021-
 - Entities registered in eRA Commons will begin to see UEI populated in Institutional Profile File (IPF).
 - NIH recipients' UEI will be populated on Page One of the Notice of Award
 - NIH recipients' UEI will be transmitted in award data reported to HHS TAGGS and USASpending.gov.
- Due dates on or after January 25, 2022- Applicants must have a UEI at the time of application submission (FORMS-G).
- March/April 2022- eRA RPPR module will be updated to require entry of the UEI.



Questions?

Division of Grants Policy:

• E-Mail: <u>GrantsPolicy@mail.nih.gov</u>

Division of Grants Compliance & Oversight:

• E-Mail: <u>GrantsCompliance@mail.nih.gov</u>

Systems Policy Branch

• E-Mail: <u>OPERAsystemspolicy@mail.nih.gov</u>

Division of Extramural Inventions and Technology Resources:

• E-Mail: Inventions@nih.gov

