SPONSORED PROGRAMS SERVICES

Lunch & Learn

November 18, 2015
Discussion Topics

• **Welcome New Staff to SPS:**
  - Margaret Machaj, Administrative Program Coordinator
  - Pam Salka, Administrative Program Coordinator
  - Agnes Kowalewska, Systems Coordinator

**NSF Webinar: Proposal & Award Policy Update**

**Significant Changes to the NIH GPS and Items of Interest**

**2016 Regenerative Medicine (Stem Cell) Competition**
Welcome to the NSF Webinar on Updates to Proposal & Award Policy

• This presentation is available at:

• For audio
  1. Dial 1.800.475.0240
  2. When prompted, enter passcode 6610096
  3. When prompted, speak name and institution
NEW PAPPG Implementation Schedule

• May 19, 2015 - Posted in Federal Register
• October 15, 2015 - Published
• January 25, 2016 - Effective Date
• **PAPPG - Significant Changes**

  ➢ AOR will now provide proposal certifications upon submission of the proposal, thus removing the ability for post-submission certification.

  ➢ 5 p.m. submitter's local time is standard for all submissions, including proposals submitted in response to solicitations.
Language has been removed permitting solicitations to specify different type size, margin and spacing requirements.

Collaborator and Other Affiliation Information has been removed from Biographical Sketch and will now be submitted as a single copy document.  

(Page limitation on Biographical Sketch remains two pages.)

Use of "should" and "must" has been reviewed throughout, and revised, where appropriate.

Results from Prior NSF Support have been clarified:
- Identify when the start of the five year period begins; and
- Provide examples of the types of NSF awards include as prior support.
Biographical Sketches and Current and Pending Support information may no longer be submitted as a single PDF (to permit automated compliance checking).

*There is special treatment for biographical sketch of “Other Personnel” and “Equipment Users”*

Internal funds allocated toward specific projects has been added as an example of Current and Pending Support.

Greater clarity has been provided regarding the type of information necessary for proposals that include use of vertebrate animals.

NSF implementation of Dual Use Research of Concern has been incorporated.

Language has been added regarding NSF’s implementation of the Federal Awardee Performance and Integrity Information System.
- Post-award Notification and Request instructions have been revised to specify that such communications must be signed and submitted by the AOR.

- Public Access Implementation incorporated into the AAG, with a link to the award term and condition.

- Additional information provided regarding the types of costs appropriate for conference proposals.

- Due date for submission of the final project report and the Project Outcomes Report has been changed from 90 days to 120 days for consistency with financial reporting information.
NSF Public Access

- Expanding Public Access to the Results of Federally Funded Research (February 22, 2013)

- NSF Public Access Website:
  nsf.gov/news/special-reports/public-access/
  - NSF's Public Access Plan

- NSF partnered with DOE to develop NSF-PAR, the first NSF publication repository
NSF Public Access Key Principles

- Focus on publications in the initial implementation
- Minimize burden on PI
- Protect PI autonomy
- Evolve incrementally
- Learn from one phase to inform the next
- Leverage existing practices and systems
- Honor NSF's customer service standard
- Provide ways to communicate and petition for a waiver
- Requirement will follow standard procedures and be implemented as part of the NSF PAPPG
NSF Public Access: Next Steps

• Launch NSF's first repository: end of calendar 2015
  Finalizing wireframes and conducting usability testing

• Effective date of Public Access policy: January 25, 2016
  Applies to awards made from proposals submitted after
  January 2016
  First set of proposals awarded June- July 2016
  Likely to see first publications requiring deposit in Fall 2016

• Prior to effective date:
  PIs will have the option to voluntarily deposit publications in
  NSF-PAR
NSF Public Access: Next Steps

- Project Reporting
  - Reduce burden on PIs by automatically ingesting publication information submitted through NSF-PAR into annual and final project reports
  - Cumulative listing of all products
  - Simplify reporting of products
  - Automatic ingest will only happen for awards that must comply with the new Public Access policy
  - NSF will be working with a small group of PIs that will voluntarily deposit publications in NSF PAR to test the automatic ingest process prior to the effective date of new policy
Public Access: Frequently Asked Questions

1. What is NSF’s public access policy?
2. Why does NSF have a public access policy?
3. How does NSF’s public access policy work?
4. Who must comply with NSF’s public access policy?
5. Does the public access policy apply to NSF staff?
6. What material is covered by NSF’s public access policy?
7. When does the policy go into effect?
8. What is a “final accepted version” of a manuscript?
9. What is a “version of record”?
10. What are “page charges”?
11. What is an Article Processing Charge (APC)?
12. Does NSF require PIs to deposit their publications in a “trusted repository”?
Ten additional Notifications and Requests were migrated to Research.gov in August 2015. They include:

- Long-Term Disengagement of the PI or Co-PI
- Pre-Award Costs in Excess of 90 Days
- Significant Changes in Methods/Procedures
- Significant Changes/Delays or Events of Unusual Interest
- Changes in Objectives or Scope
- Reallocation of Funds Provided for Participant Support Costs
- Change in Person-Months Devoted to the Project
- Withdrawal of PI or Co-PI
- Rearrangements/Alterations in Excess of $25,000 (Construction)
- Conflicts of Interest

No Cost Extensions were migrated in October 2015.
Research.gov
Notifications and Requests (Cont'd)

Features:
- "Prepare New" or view N&Rs needing action
- View all N&Rs whether created in Research.gov or Fastlane
- Click the "Go to Fastlane" to view N&Rs created in Fastlane without signing in again
- N&Rs organized by type
- User will be taken to Fastlane if they select a N&R that is not yet available in Research.gov
Automated Compliance Checking

• NSF continues to focus on implementing automated proposal compliance checks to reduce workload.

• Newest set of compliance checks surround proposals submitted in response to program solicitations (by funding mechanism). Warning messages are triggered if any of the following sections are not included:
  References Cited
  Biographical Sketch(es)
  Budget Justification: Primary Organization
  Budget Justification: Sub-recipient Organization
  Current and Pending Support
  Facilities, Equipment and Other Resources

• Grants.gov does not perform these types of compliance checks and may allow a proposal to be submitted.
Automated Compliance Checking

<table>
<thead>
<tr>
<th>COMPLIANCE CHECK</th>
<th>FUNDING OPPORTUNITY TYPE</th>
<th>ERROR / WARNING</th>
<th>FUNDING MECHANISM TYPE</th>
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<tbody>
<tr>
<td>Proposal Section Exists Checks</td>
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<tr>
<td>1. Project Summary is required</td>
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<td>IDEAS LAB</td>
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<td>2. Project Description is required</td>
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<td>Program Description</td>
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<td>INTERNATIONAL TUNNEL</td>
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<td>Program Solicitation</td>
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<td>FACILITY CENTER</td>
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<td>3. References Cited is required</td>
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<td>4. Biographical Sketches is required</td>
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<td>5. Primary Budget is required</td>
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<td>6. Budget Justification for the Primary Organization is required</td>
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<tr>
<td>7. Budget Justification for each Subrecipient Organization that exists is required</td>
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Proposal Submission Modernization (PSM)

- PSM is a multi-year initiative to modernize the proposal submission capabilities currently in Fastlane and implement new capabilities in Research.gov.
- Recent survey results indicate strong interest and support in the following areas:
  - Pre-populating proposals with existing data;
  - Allowing certain documents or approvals (e.g. data management plan, detailed budgets, Institutional Review Board approval) to be submitted after proposal submission;
  - Revising the format of NSF solicitations to identify the difference between solicitation-specific requirements and standard NSF proposal requirements;
  - Tailoring the proposal interface to reflect the requirements of a given funding opportunity;
  - Publishing and enforcing a NSF-wide list of proposal compliance requirements.
Reducing Administrative Burden

• In January 2015, NSF provided an update to the NSB Report, Reducing Investigators' Administrative Workload for Federally Funded Research.

• NSF is identifying pilot projects to reduce PI and NSF staff administrative burden.

• Considerations are related to preliminary proposals, streamlined budgeting, just-in-time submissions, IRB and IACUC protocols, project reporting and proposal development.
Reducing Administrative Burden
Pilot Programs

• "Just-in-Time" budget process for selected core programs in MPS/DMS, MPS/PHY, and ENG/liP
  – Require only a textual description of the resources necessary to complete the project.
  – Require detailed budget only if the proposal is recommended for an award.
  – Allows reviewers and NSF staff to focus on the science.

• Improving the IACUC process- award to PRIM&R
  – Award is to develop a Train-the-Trainer IACUC Institute
  – Goal is to improve oversight of animal care and use programs nationwide by ensuring IACUC accurately apply current regulatory standards
  – Funding also provided by NIH, FDA, and USDA
Key Documents

- Proposal & Award Policies & Procedures Guide

- Fiscal Year 2016 Budget Request
  [nsf.gov/about/budgetfy2016/index.jsp](http://nsf.gov/about/budgetfy2016/index.jsp)

- NSF Strategic Plan for Fiscal Years 2014-2018

- NSB Report on Merit Review
Summary of Upcoming Significant Changes to the NIH Grants Policy Statement

The revised NIH Grants Policy Statement (NIHGPS, rev. 11/2015) will represent an update to the 03/31/2015 version and will be applicable to all NIH grants and cooperative agreements beginning on or after the revision date. It incorporates new and modified requirements, clarifies certain policies, and implements changes in statutes, regulations, and policies that have been implemented through appropriate legal and/or policy processes since the previous version of the NIHGPS dated 03/31/2015. When issued, the revised NIHGPS will supersede, in its entirety, the NIH Grants Policy Statement (03/31/2015) as a standard term and condition of the award. Please note that this document is for information only and that these changes will not be effective until the revised NIHGPS is issued by NIH in November.

<table>
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<tr>
<th>Section</th>
<th>Significant Changes</th>
<th>Reason</th>
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<tr>
<td>PART 1: NIH Grants – General Information</td>
<td>Sec. 2.3.7.10 NIH Genomic Data Sharing: Requires that applications proposing to generate large-scale human and/or non-human genomic data are expected to include a genomic data sharing plan; requires that applicants who wish to use controlled-access human genomic data from NIH-designated data repositories briefly address their plans for requesting access to the data in the application, and state their intention to abide by the NIH Genomic Data User Code of Conduct.</td>
<td>Implements provisions announced in <a href="https://notod.nih.gov/NOT-OD-15-083">NOT-OD-15-083</a> and <a href="https://notod.nih.gov/NOT-OD-15-086">NOT-OD-15-086</a>.</td>
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<tr>
<td>Chapter 2 – The National Institutes of Health as a Grant-Making Organization</td>
<td>Sec. 2.3.9.5 Application Non-compliance: Reminds applicants that NIH may withdraw any application identified during the receipt, referral and review process that is not compliant with the instructions in the SF424 (R&amp;R) Application Guide, the Funding Opportunity Announcement, and relevant NIH Guide Notices. Subsequent subsections renumbered.</td>
<td>Implements provisions announced in <a href="https://notod.nih.gov/NOT-OD-15-095">NOT-OD-15-095</a></td>
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<tr>
<td>PART II: Terms and Conditions of NIH Grant Awards</td>
<td>Chapter 4 – Public Policy Requirements, Objectives and Other Appropriation Mandates</td>
<td>4.1.3 ClinicalTrials.gov Requirement Text added to clarify that results reporting is still required after the period of performance has ended.</td>
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<td>Sec. 4.1.15.9 Informed Consent for Research on Dried Blood Spots Obtained Through Newborn Screening:</td>
<td>Implements provisions announced in NOT-OD-15-127.</td>
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<td>Sec. 4.1.14 Human Fetal Tissue Research The language is changed from “guidance” to “regulatory requirements”.</td>
<td>To highlight this is a regulatory requirement.</td>
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<tr>
<td>Chapter 8 – Administrative Requirements</td>
<td>Sec. 8.1.1.3 Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds</td>
<td>To reduce administrative burden, NIH will allow our recipients to reduce effort during a NCE without prior approval.</td>
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<tr>
<td>Sec. 8.1.2.5 Change in Scope: Expands the description of Changes from the Approved Involvement of Human Subjects Requiring Prior NIH Approval</td>
<td>Implements provisions announced in NOT-OD-15-128 and NOT-OD-15-129.</td>
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<tr>
<td>Sec. 8.2.3.3 Genomic Data Sharing (GDS) Policy: Allows investigators to request permission to transfer controlled-access genomic and associated phenotypic data obtained from NIH-designated data repositories that are under the auspices of the NIH GDS Policy to public or private cloud systems for data storage and analysis.</td>
<td>Implements provisions announced in NOT-OD-15-086.</td>
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<td>Sec. 8.2.4 Inventions and Patents: Requires recipients to report inventions subject to Bayh-Dole regulation electronically to NIH through iEdison (<a href="http://iEdison.gov">http://iEdison.gov</a>).</td>
<td>Implements provisions announced in NOT-OD-15-080.</td>
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Here is some of the stuff our staff look for:

- Does the topic of the application fit NIH’s mission?
- Is the applicant eligible to apply?

For example, if applying to the AREA (R15) program do the applicant organization and PI meet the eligibility requirements specific to that program?

- Does the application include all critical sections?

Our systems can tell if you attached a pdf document in a certain spot in the application, but can’t assess the content of that attachment. We’ve received all sorts of “unintended” attachments over the years from our own application guide instructions to a great recipe for cranberry margaritas (true story). To be fair, the recipe makes excellent margaritas (I’ll be making them again this holiday season), but it was a poor substitute for a research strategy.

- Does the application include information in inappropriate places to get around page limits?

We refer to the use of appendices and other non-page limited application sections to augment information in page limited sections as “overstuffing” your application (NOT-OD-11-080, NOT-OD-07-018). Your specific aims, research strategy, abstract, biosketches and other application attachments have page limits for a reason – to provide a fair and level playing field to convey information. We take that “fairness” thing pretty seriously around here.

- Was the application submitted on-time?

Unlike many agencies, NIH does not shut down the ability to submit to a funding opportunity announcement at 5:01 pm on a due date. We keep the submission door open and assess the circumstances of “late” submissions on a case-by-case basis. Staff check your cover letter submitted with your application for documented circumstances allowed under our late policy. They check to see if the application falls under our continuous submission policy. They also check to see if you ran into any system issues along the way and appropriately notified the eRA service desk to document them.

- Do you already have an application with essentially the same content under review?

Even under our latest submission rules which allow you to submit the same application again, you can’t have overlapping applications under review at the same time (NOT-OD-14-074).

- Does your application adhere to FOA-specific instructions in Section IV – Application and Submission Information?

Instructions in this section are often not systematically enforced, since they are exceptions from our general guidance. So, don’t rely on system checks to catch page limits and missing attachments documented in this section.

- If reference letters apply, were the correct number of reference letters received by the due date?

- Did you follow font and margin guidelines documented in the application guide when preparing all your attachments?

- If requesting over $500K in direct costs in any budget period, did you have institute permission to submit?

- If human embryonic stem cells are indicated, were all restrictions for their use met?

Although you may not have seen this particular list of checks before, I doubt there are a lot of surprises. The real takeaway here is that system checks are great (begin shameless plug – The Validate Application feature in ASSIST is awesome! – end shameless plug), but they are not the whole story when it comes to assessing whether an application meets all the conditions to be accepted for review and funding consideration.

When submitting your application, don’t just think about getting through our systems. Stop to think how your application will hold up to the scrutiny of someone with eyeballs.
• Mistakes Are Meant for Learning, Not Repeating – Biosketch Compliance

On November 5, NIH started sending email notifications to applicants indicating reviewers found one or more biosketches that did not comply with our current biosketch format (NOT-OD-15-032). Hundreds of letters have already gone out. If you’ve received one of these notifications, don’t panic. These letters are currently just warnings and require no action on your part. However, they do demonstrate NIH’s commitment to enforcing compliance with our biosketch policy.

• What does it mean to have a compliant biosketch?

• eRA systems ensure some biosketch rules are met by flagging errors upon submission. Applications that violate these rules won’t even move forward to NIH for consideration.

• A biosketch is attached for each and every Sr/Key person listed in the application

• Each biosketch is less than or equal to 5 pages

• Each biosketch attachment is in PDF format

But, there are additional rules you must follow to be compliant that aren’t systematically caught by eRA systems.

• Include each section (A - Personal Statement; B – Positions and Honors; C – Contributions to Science; D – Research Support or Scholastic Performance)

• Include no more than 5 contributions to science with no more than 4 citations per contribution

• Ensure that if you include the optional link to a full list of your published work in a site like My Bibliography that the URL is public, accessible without providing any login or personal information, and doesn’t link to websites that may violate page limit rules

  • Note: We will restrict this link to federal (.gov) sites beginning with applications to due dates on/after May 25, 2016 (NOT-OD-16-004)

• Refrain from including information, such as preliminary data, that belongs elsewhere in the application

• Follow NIH guidance on font type, font size, paper size, and margins (See section 2.6 of application guide)

Did you catch the part where I said “reviewers found” the non-compliant biosketches? We have provided instructions to our reviewers to flag any applications with biosketches that don’t follow current guidelines. Don’t make extra work for your reviewer – give them a clean application without the distraction of non-compliant formatting they have to write up.

• Having trouble keeping up with NIH’s biosketch rules and getting your key personnel to follow them? Encourage people participating on your application to use SciENcv. Not only does SciENcv help manage biosketch information, it also creates perfectly compliant biosketches.

• If you’ve received a warning letter, learn from your mistakes and don’t repeat them. Eventually, these warning letters will be replaced with notifications that applications have been removed from consideration. You’ve been warned (queue foreboding music in your head).