NIH Update – FDP

NIH OFFICE OF POLICY FOR EXTRAMURAL RESEARCH ADMINISTRATION

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NIH > National Institutes of Health
Office of Extramural Research

Budget News & Fiscal Policy Updates

- As of December 27, 2020, NIH is funded under the *Consolidated Appropriations Act, 2021* ([Public Law 116-260](#)).
- NIHs FY 2021 budget amount is $42.9 billion which represents a 3 percent increase over the FY 2020 final funding level
- NIH has issued several important fiscal policy Guide Notices:
  - [NOT-OD-21-057,](#) FY 2021 Salary Cap
    - Effective Jan 3, 2021: $199,300
  - [NOT-OD-21-056](#), FY 2021 Legislative Mandates
  - [NOT-OD-21-049](#), FY 2021 NRSA Stipend Levels
    - Effective for all FY21 NRSA awards
  - [NOT-OD-21-058](#), Notice of Fiscal Policies in Effect for FY 2021

2021 NIH Virtual Seminar on Program Funding and Grants Administration

- [Save the Date!](#) November 1-4, 2021

- Free Registration—Opens Soon! [Sign up](#) for notification when registration opens!

POLICY UPDATES

Updates to the Non-Discrimination Legal Requirements for NIH Recipients

- NIH has updated and implemented HHS language on the Non-Discrimination Legal Requirements for Recipients of Federal Financial Assistance, to comply with 2 CFR Part 200.300 and to ensure that NIH is promoting equity in its grant awards.

- NIH is updating its Funding Opportunity Announcement (FOAs) and terms and conditions of award.
  - Updated language is outlined in the linked guide notice.

- This language will be incorporated into the NIH Grants Policy Statement (GPS) upon its next publication.

- Reminder- There is no policy change or change in requirements.

See details: NOT-OD-21-181

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Reminder: NIH Natural Disaster Policy

- It is highly likely that recent hurricanes have adversely impacted some NIH applicants' and recipients' ability to submit applications and/or reports in a timely manner.

- Generally, NIH considers accepting late applications when delays occur because the applicant or recipient organization is officially closed due to a natural disaster or other emergency.

- In addition, note the following:
  - Institutions must submit applications or reports as soon as possible after reopening, not to exceed the number of days the institution was officially closed.
  - Institutions must submit a cover letter with the application, with enough detail about the delay so that NIH staff can determine whether circumstances justify accepting the application late.
  - Institutions need not request advance permission to submit late due to a disaster-related delay.

See details: NOT-OD-21-178

Reminder: Grants Policy Related Inquiries

- The NIH grants policy inbox has experienced an increasing volume of inquiries that are from non-designated contacts, or best directed to the:
  - recipient or applicant organization's internal grants administration contacts (e.g., Office of Sponsored Programs),
  - NIH contacts named in the Funding Opportunity Announcement (FOA),
  - NIH grants management contact at the awarding Institute or Center (IC).

- Inquiries regarding general grants-policy matters are best directed first to the recipient's Office of Sponsored Programs; specifically, the AOR.

- Where these contacts are not able to assist in resolving the inquiry or determine a need to seek guidance on a complex or unusual policy circumstance, recipient/applicant's AOR may submit policy-related inquiries on the organization's behalf to the NIH grants policy inbox.

See details: NOT-OD-21-051

NRSA Childcare Costs

- 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.
- Costs are permitted for dependent children living in the eligible fellow's home from birth under the age of 13, or children who are disabled and under age 18.
  - Childcare costs do not apply to elder or non-child dependent care costs.

See details and application instructions: NOT-OD-21-074

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

- Targeting due dates on or after January 25, 2022
- An eRA Commons ID must be entered in the "Credential, e.g. agency login" field for all Senior/Key Personnel listed on the R&R Senior/Key Person Profile (Expanded) Form
- Senior/Key Personnel (NIH defined in NIH GPS 1.2)
  - 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.

See details: NOT-OD-21-109

COMMITMENT TRANSPARENCY

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What is commitment transparency?

Transparency and reporting of *all* research activities, domestic and foreign

- Openness and transparency enables productive collaboration and helps ensure appropriate disclosure of potential conflicts of interest and commitment

- Failure by some researchers at NIH-funded institutions to disclose substantial contributions of resources from other organizations, including foreign governments, threatens to distort decisions about the appropriate use of NIH funds

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)

- NIH will require the use of the updated format pages on and after **January 25, 2022**
  - Electronic signatures and supporting documentation will be required beginning **January 25, 2022**
  - 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

- **Questions about OS and Biosketch should be sent to nihosbiosketch@nih.gov**

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Commitment Transparency – Looking forward

- NIH understands that most institutions and researchers are honest and dedicated, and that the individuals violating laws and policies represent a small proportion of scientists working in and with U.S. institutions.

- We continue to work with our federal-wide agency partners on implementation of disclosure requirements across the government

- More detailed discussion will be held on **FDP's Wednesday Science and Security Session**

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.

- Errors mainly caused because 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.

Learn more: NOT-OD-21-060, NOT-OD-21-128, NOT-OD-21-138

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Update – Process for Submission of FFRs for Closed PMS Subaccounts

- Recipients are unable to submit FFRs on closed PMS subaccounts (e.g. "C" status).

- When a recipient identifies a need to revise an FFR for a closed PMS subaccount, the recipient should contact the NIH Office of Financial Management (OFM). Recipients should email the OFM staff member assigned to their account. These assignments may be found at https://ofm.od.nih.gov/Pages/Grants-FFRS0.aspx.

    - In that email, the recipient should provide the grant number, PMS document number, details on the FFR revisions needed, and a request to re-open the subaccount.

- Upon receipt, OFM will review the information, and submit a transaction in the NIH financial system to re-open the subaccount. OFM will notify the recipient when the action is complete, and the recipient must then submit the revised FFR in PMS for NIH review and approval.

    - Any questions or issues should be sent to the OFM-GAB Branch Chief – Don Geiger don.geiger@NIH.gov.

Learn more: NOT-OD-21-060, NOT-OD-21-128, NOT-OD-21-138

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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: OPERAsystemspolicy@nih.gov

- Direct all eRA systems-related inquiries to:
  - eRA Service Desk
    Submit a web ticket: https://grants.nih.gov/support/index.html
    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: http://www.psc.gov/one-dhhs
    Email: PMSSupport@psc.hhs.gov
    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: https://pms.psc.gov/training/gr-ffr-training.html

Learn more: NOT-OD-20-127, NOT-OD-21-046, NOT-OD-21-060,

NOT-OD-21-128, NOT-OD-21-138

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FORMS-G

- Effective for application due dates on or after January 25, 2022.
- FORMS-G Application Guide publication and posting of FORMS-G application forms package to active FOAs will begin in late October 2021.
- Additional guidance and final implementation details will be provided in Fall 2021.
- Substantive form changes (i.e. new/deleted/modified fields):
  - SF424 R&R
  - R&R Senior/Key Person Profile (Expanded)
  - R&R Budget and Associated Subaward Budget Attachment(s) Form
  - Project/Performance Site Location(s)
  - PHS 398 Training Budget and Associated Subaward Budget Attachment(s) Form
  - PHS Additional Indirect Costs
  - PHS Fellowship Supplemental Form
  - PHS Human Subjects and Clinical Trials Information
  - SBIR/STTR Information

Learn more: NOT-OD-21-169

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FORMS-G Key Changes

- Federal-wide transition from the DUN and Bradstreet (D&B) Data Universal Numbering System (DUNS) number to the new government-owned Unique Entity Identifier (UEI). See NOT-OD-21-170.

- Required use of the updated Biographical Sketch and Other Support format pages. See NOT-OD-21-073, NOT-OD-21-110, and NOT-OD-21-122.

- Federal-wide adoption of the Grants.gov updated country and state lists

- Expansion requirement for eRA Commons IDs to all Senior/Key Personnel. See NOT-OD-21-109.

- New budget section for requesting childcare costs on the PHS Fellowship Supplemental Form. See NOT-OD-21-074.

- See High-level Summary of Form Changes in FORMS-G Application Packages for full list of changes.

Learn more: NOT-OD-21-169

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

- In December 2020, NIH announced that eRA users were required to transition to the use of a two-factor authentication service provider, specifically Login.gov, by September 15, 2021.

- To ensure a smooth transition and to respond to feedback from users, the timeline for implementing the requirement is being adjusted to phase in the requirement for most users and introduce another supported two-factor authentication service to support InCommon Federated institutions.

- Adjusted Timeline and Approach:
  - Starting September 15, 2021, eRA will begin a phased approach for requiring the use of two-factor authentication for user accounts. The new timing of enforcement depends on the type of user account.
  - This phased approach applies to all scientific account holders but excludes administrative accounts until early 2022. (See also eRA Commons User Roles)
  - Triggering event: All PIs and key personnel associated with an application or Research Performance Progress Report (RPPR) will be 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.

- Creating a Login.gov account and associating it with your eRA account is a simple, one-time, three-step process that should only take a few minutes. See step-by-step instructions, FAQs, video tutorials and more at the Access eRA Modules via Login.gov webpage.

- For further information about using an InCommon Federated account see the Access eRA Modules Via an InCommon Federated Account webpage.

Learn more: NOT-OD-21-040, NOT-OD-21-172

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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.

- Note: Entities registering prior to April 2022 must still obtain a DUNS prior to SAM registration.

Learn more: NOT-OD-19-098, NOT-OD-21-170

UEI Implementation

- Mid-FY 2021- All entities registered in SAM will automatically be 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.

- For applications due on or after January 25, 2022, applicants must have a UEI at the time of application submission. Application forms and packages required for application submission will be updated to reflect UEI instead of DUNS (FORMS-G).

Learn more: NOT-OD-19-098, NOT-OD-21-170

Questions?

Division of Grants Policy:

- E-Mail: GrantsPolicy@mail.nih.gov

Division of Grants Compliance & Oversight:

- E-Mail: GrantsCompliance@mail.nih.gov

Systems Policy Branch

- E-Mail: OPERAsystemspolicy@mail.nih.gov

Division of Extramural Inventions and Technology Resources:

- E-Mail: Inventions@nih.gov

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