Grants Management:
Reporting and Revision Strategies Funders Will Applaud

Presented by: Michael Lesiecki, PhD

Provided By:
Principal Investigators Association™

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Best Regards,
Leslie Norins, M.D., Ph.D.
Founder
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Grants Management:
*Reporting and Revision Strategies Funders Will Applaud*
-What Every PI Should Know and Do

Michael Lesiecki, PhD
PI and Consultant

About the Presenter

- I have had the privilege to be a PI and Reviewer for both NIH and NSF grants since 1989.
- My technical background is chemical physics with a lot of focus on applications of laser technology in science and medicine.

About the Grants Management Series

- The proposal has become a funded grant. Let’s get on with the work!
- However, in addition to the scientific endeavor the PI bears responsibility for the overall management of the project.
- What are those responsibilities? How is a PI supposed to know?
PI and Grants Management

- What can a PI do at the beginning to insure a smooth running project?
- Looking forward, what can the PI set in place now to insure a clean close out?
- How can the PI make adjustments or corrections for errors that may come up in spending or compliance related issues?
- And...what should the PI do when the auditor comes?

The series focuses on five major topics:

1. **Effort Reporting** including certification and the issues of summer salaries.
2. **Costs and Finances** including misallocations, cost sharing and transfers.
3. **Monitoring** with a major focus on subaward and contracted efforts.
4. **Reporting and Revisions** to scope of effort, budget and personnel.
5. **Compliance** including Conflicts of Interest, Institutional Review Boards, Data Management.

Point of View

- The PI and Research Team.
Reporting Is A Fact Of Life For a PI

- Annual
- Final

At Some Point

- You will face a report deadline and wished you had organized the whole thing sooner.

Grants Management Series: Outcomes

- What Successful Grant Project Management Looks Like.
- Catalyze a Discussion With Your Office of Sponsored Programs.
- Disclaimer……
Reporting Issues Can Lead To

- Inefficient Project Management.
- Potential Audit Findings.

NIH Image, capillary DNA sequencing effort

Diversion Into Audits

- The federal government uses various types of risk indicators regarding the management of grant funds:
  - A “Single Audit”
  - Desk Review
  - Site Visits
- If risk (financial or compliance) is identified this can trigger an Office of Inspector General audit.

The Single Audit

- Sometimes referred to as a A-133 audit.
- Audits of Institutions of Higher Education and Non-profit organizations.
- Applies to recipients who expend more than $500k in one year.
  - Typically leads to an identification for high or low risk.
  - In AZ ...
Desk Review

- Assesses the financial and administrative capabilities of awardees.
- Often done for new grantees.

Site Visit

- Ensure adequate internal controls, policies, processes, and systems exist to appropriately manage awards.
- Assess capability, performance and compliance against administrative regulations and public policy requirements.
- Report on the effectiveness of grantees and grant programs and the stewardship of public funds.

Grantee Risk Areas: NIH

- Inaccurate Effort Reporting
- Misallocation of Costs
- Excessive Cost Transfers
- Unallowable Costs
- Inadequate Subrecipient Monitoring
- Delinquent Reporting to Sponsor

Today: To Frame This Issue We Look at an Audit Story…

- A Large University in the Southwest:
  - …Another audit finding criticized two late reports on the University’s use of federal grant funding.
  - The reports, compiled by the Contract and Grant Accounting office and submitted as many as 10 months late.

Audit Report: Consequences

- The departments “didn’t get it done, and our guy in the central offices who’s responsible for it let them slide,” the officer said.
- “He got caught. He’s no longer working with us.”


The Responsibility the PI Faces: Reporting

- NIH and NSF perspectives.
PI Responsibilities: NIH Language

- There are reporting requirements associated with every NIH grant:
  - financial reports,
  - progress reports,
  - invention reports,
  - and audit reports.

  [http://grants.nih.gov/grants/funding/welcomewagon.htm#rprtreq](http://grants.nih.gov/grants/funding/welcomewagon.htm#rprtreq)

And …

- An annual project report also serves as the Awardee’s request for continued support.

NSF Language

- Annual Reports are due within 90 days prior to budget end period.
- Final Reports must be submitted within 90 days following the expiration.
- Annual Reports individually address each reporting year;
- The final report should only address the last year.
Important New NSF Reporting Requirement

- Project Outcomes

PIA 22

NIH Gallery Image

More About Project Outcomes

- Project Outcomes Reports do not take the place of the annual or final technical project reports.

- Having an overdue Project Outcomes Report will delay NSF actions on any other proposal or award related to the PI or co-PI.
Example

- The report should serve as "a brief summary (200-800 words).
- Prepared specifically for the public.

Example: The ability to see deeply into the multiple layers of tissue at the back of the eye and observe blood flow can help identify diseases that limit vision or cause blindness.

Map the Outcomes to Intellectual Merit and Broader Impacts

- The report should describe the project outcomes or findings that address the intellectual merit and broader impacts of the work.

Submitting the Project Outcomes Report

- Log-in to Research.gov (first time Research.gov users, see How Do I Login?).
- If you are a PI or co-PI on an award that requires this report, you will see the Project Outcomes Report dashboard on your homepage.
- Click on the Project Outcomes Report link to see a list of awards.
- From there, you can create, edit, and submit reports for each award.
How Do You Know When Reports Are Due? NSF


What Is The NSF Program Officer Looking for in Addition to Activities and Findings?

- NSF Acknowledgement.
- Changes in the use of human subjects that could mean a change in IRB approvals.

How Do You Know When Reports Are Due? NIH


- Must be submitted to, and approved by, the NIH to receive funding for each subsequent budget period
What Are the Consequences of a Late Final Report?

- NIH will consider imposing sanctions to institutions that fail to correct recurring reporting problems:
  - restriction of facilities and administrative (F&A) costs,
  - delay or withholding of further awards to the project or program,
  - designation as a high-risk grantee.

Questions?

Resources

- Tips and Guidelines on the Submission of Effective Annual, Final, and Project Outcomes Reports
As A PI

- I missed a report deadline.
  - Automated notifications went out to my Vice Chancellor.
  - My co-PIs were notified and they were now prevented from seeking additional grants while my report was “overdue.”

A Closer Look: NIH

- Progress reports are required at least annually as part of the non-competing continuation award process.
- PHS 2590
  - [http://grants.nih.gov/grants/funding/2590/2590.htm](http://grants.nih.gov/grants/funding/2590/2590.htm)

SNAP: A Streamlined Process for Non-Competing Awards

- SNAP includes a number of provisions that modify annual progress reports and financial reports.
NIH FLAGS (Audit and Otherwise)

- Annual reporting observed issues:
  - Accurate responses to SNAP questions, specifically unobligated balance greater than 25%
  - Accurate Personnel Report - listing of ALL personnel involved in the project

NSF: A Closer Look at A Similar Issue

- Address any carryover funds in the annual report. This will help the NSF Program Official evaluate the financial needs of the project.

Reporting the “Carry Forward” Funds: Year 1

- Unobligated balance calculation: assume 100k per year base budget

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### Reporting the “Carry Forward” $ Year 1

- Unobligated balance calculation: assume 100k per year base budget

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### Reporting the “Carry Forward” $ Year 2

- Unobligated balance calculation: assume 100k per year base budget

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### Reporting the “Carry Forward” $ Year 2

- Unobligated balance calculation: assume 100k per year base budget

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**Reporting the “Carry Forward” $**

**Year 2**

- Unobligated balance calculation: assume 100k per year base budget

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**Year 3**

- Unobligated balance calculation: assume 100k per year base budget

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**Year 4**

- Request a No-Cost Extension

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Special Requirements: Examples

- CAREER Awards
- Annual reports must also provide approval and reaffirmation of the department's endorsement of the work plan and continuing partnership in the individual's career-development plan.

Requests for Revisions

- “It’s best to discuss these with a Program Officer before the change is made in fastlane.” Source: David Campbell, NSF, Program Director, 2010.

Revisions and NIH

- After discussing with Program Officer, you must revise the:
  - Project Summary/Abstract,
  - Specific Aims, and/or
  - Public Health Relevance sections as appropriate.

A Change in Scope? Examples

- Changing the Specific Aims.
- Changing to a different animal model.
- A clinical hold by FDA for a study involving an investigational new drug or investigational device exemption.
- Any change pertaining to research animals or human subjects in a way other than approved.
  - [http://www.niaid.nih.gov/researchfunding/int/grantspolicy/Pages/gm03.aspx#c1](http://www.niaid.nih.gov/researchfunding/int/grantspolicy/Pages/gm03.aspx#c1)

More Possible Scope Change Examples

- Shifting the research emphasis from one disease area to another.
- Using a new technology.
- Rebudgeting funds in or out of a single budget category by more than 25 percent of the total costs of the award.
- Making a change in key personnel, including if the principal investigator is on a leave of absence for more than 90 days.

Yes, but Why do I need to submit annual and final reports for my award?

- Because you have to.
- Project reports are a critical communication between you and the program(s) that manages your award.

NIH Image, Hair cell of amphibian inner ear
Photo credit: A.J. Hudspeth, M.D, Ph.D.
Your Project Report Is

- An essential resource when Program Officers are looking for program highlights.
- A permanent record of the work that has been supported by NSF.
- Used by outside reviewers to evaluate NSF programs.

More About Your Report

- And, can be used by NSF to assure Congress and the American taxpayers that NSF is addressing its mission and goals.

What Other Reports May Be Required?

- Invention Reporting
Invention Reporting: iEdison

- [https://s-edison.info.nih.gov/iEdison/](https://s-edison.info.nih.gov/iEdison/)

- The Bayh-Dole Act regulations require that government funded inventions be reported to the federal agency who made the award.

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Unanswerable FAQ

- Why does the Government only Add regulations and never take any away?

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Grants Management Tip

- Use a variety of ticklers to invoke reports and due dates.
- Engage your research team.
PI Responsibilities: Revisions

- Revisions happen.
- When should you Revise?
  - Change in Co-PI
  - Addition or Deletion of a Major Goal
  - Equipment
  - Shifting of Effort

NIH Clinical Center, NIAMS Arthritis and Rheumatism Branch, Molecular Inflammation Section

Nevers

- Fail to discuss major revisions with your Office of Sponsored Programs.
- Get a revision approved without your OSP in the loop.

Transmission electron microscope, NIH Image

Audit Tip

- Use documentation to head off problems.

Dino Footprints, NSF, Credit: Russell Cothren, University of Arkansas
How to Test Your System

- Think like an auditor.
- Ask your staff and research team the following questions.

Ask These Questions

- When is the next annual report due? When will it be over due?
- Who can take the section of the report for Goal 1. Who has the most direct knowledge?
- What is our projected carryover for next fiscal year?

What to Do When the Auditor Comes

- In the case of reporting, documentation is the key.
- Retain your records.
- Poll how long should you retain project records?
  - 3 years
  - 5 years
  - 7 years
Grant Management Tips: Don’ts

- Don’t give a step by step listing of your data analysis;
- Don’t provide all the results of your statistical analysis – summarize instead!
- Don’t leave blank sections for which you can report something;

More Don’ts

- Don’t upload your article(s) as a replacement for your report;
- Don’t list publications or presentations that report activities and findings that were not supported by the award;
- Don’t upload copies of unpublished manuscripts.

Grants Management Success

- Think of reporting as an integral communication vehicle.
- Use reports as content for email announcements, press releases, newsletters, reports to congress.
- Consider posting reports on your project’s website.
Grants Management Success (cont’d)

- Include in your report, discussion of any impediments that altered or interfered with the progress of your funded project, and how you plan to address them.
- Help your research staff gain experience by contributing to reports.

Summary

- Framed Reporting as a “must do.”
- Described the PI responsibilities from both the NSF and NIH perspectives.
- Introduced the new (this month) Project Outcomes report.
- Described in detail the reporting of “carry over” funds.
- Looked carefully at revisions and the concomitant changes in Scope.

Questions?

Biomechanical Modeling, NSF/Sung-Hae Lee, Efthychios Sifakis and Demetri Terzopoulos, University of California, Los Angeles
Grants Management: What Every PI Should Know and Do

It's official! Your proposal has now become a funded grant. Yet, in addition to the scientific endeavor, as a PI, you bear responsibility for the overall management of your project. But, what exactly are those responsibilities and what does it mean to you? What can you do from the start to ensure a smooth and compliant running project? What should you do when the auditor comes?

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Each Webinar completely covers one important facet of the grants management process, but as a series they represent a comprehensive view of the major aspects of grants management today.

Who Should Attend?

PI's, Research Teams, Grants Management, Sponsored Program Office and Administrative personnel. This series can and will catalyze a strong working relationship with grants accounting, grants management, research and the PI's team.

Meet Your Expert Presenter:

Michael Lesiecki, PhD, is the principal investigator for a large grant from the National Science Foundation’s Advanced Technological Education program. He has 27 peer-reviewed journal publications and one patent. He received his PhD in Physical Chemistry from Oregon State University.

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