

# GMO Guide: How Do I Manage my US Federally Funded Grant?

## Part 1: What are my ongoing Responsibilities?

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### US Federal Research Funds

#### Receipt of Funds

NIH grant payments are scheduled quarterly in advance, no invoicing or request is required by NIH. Other Federal Departments do not require an invoice, but may require UNSW to request an advance or reimbursement of funds spent. The GMO will arrange these requests after consulting with the UNSW Lead Investigator in regards to the most appropriate schedule for these requests.

If your award is > A\$50,000 it is UNSW policy that a hedged exchange rate is fixed for the term of the project. The Grants Management Office (GMO) will arrange the hedge with UNSW Treasury. This provides certainty around the funds that you will have available to spend. If your award is < A\$50,000 hedging is optional and the GMO will consult with you regarding your hedging preference, however if a US\$ grant is not hedged, researchers must monitor revenue v budget, so that adjustments are made for any fluctuations from the exchange rate used to estimate the A\$ budget.

#### Allowable Expenditure

US Federal Government funding agencies have clear guidelines relating to allowable costs. While these may vary slightly from scheme to scheme, there is a clear expectation across all agencies that US Federal funding should not be used to meet the indirect costs of institutions.

#### **Costs must be:**

- Reasonable: 'prudent person test' / specific circumstances;
- Easily identified and assigned to the activity on some reasonable basis;
- Incurred solely to advance the work under the sponsored agreement / not for convenience or to cover over-expenditures.

**Special conditions apply to the following costs:** *in some cases you will need to seek sponsor approval for expenditure or transfer costs to operating accounts.*

- International airfares- You must 'Fly America' where possible. UNSW travel policy and procedure must also be followed for all travel expenditure incurred.
- Entertainment costs- Considered to be unallowable and should not be charged to the grant.
- Catering- If outlined in the proposal, catering is allowable. This can be double-checked against the grant and the conditions of award.
- Staff expenses- *e.g. tea/meal money, gifts/awards, training/education*- generally unallowable and considered indirect costs that institutions should meet from their core operating funds.
- Membership fees- generally unallowable and considered indirect costs that institutions should meet from their core operating funds.

- Other Equipment- e.g. *communications costs (mobiles, telephone calls), personal computers, related network peripherals and software needed for communicating, writing and undertaking simple analyses, computer networks and basic network utilities, office services and laboratory services, furniture for research staff and research infrastructure*. Expenditure against this account should be carefully scrutinized. Only allowable if the equipment is unique and essential to the project. Normally would have formed part of the application budget.
- Computer Equipment- Only allowable if the equipment is unique and essential to the project. Normally would have formed part of the application budget. Any 'general purpose' IT or computing equipment disallowed as it is expected this will be provided by the University.
- Plant & Equipment- Expenditure allowed if appropriate, essential to the project and in-line with the approved research plan/budget.

### Indirect costs

Limited Indirect Costs, equal to 3% of total Direct Costs, MUST be budgeted to support the cost of UNSW complying with US audit requirements. This 3% is shown separately on your Budget Release Confirmation and is transferred by Research Finance to a specific UNSW account setup for US audit costs, at the time of Budget Release.

This amount covers UNSW compliance requirements such as:

- Legal and insurance costs
- Ethics approval and trial monitoring costs
- The cost of complying with OH&S requirements in a laboratory environment
- The cost of annual A133 Certification

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## US Federal Funding Administrative Obligations

### Certifications and Assurances

On submission of your US Federal Funding application the GMO certifies that UNSW complies, or intends to comply, with all applicable policies. There are a number of Public Policy requirements associated with US Federal Funding which you need to be aware of and the most relevant include:

- Animal Welfare – The UNSW Research Ethics Compliance Support Unit (RECS) maintains an Animal Welfare Assurance which is filed with the US Office of Laboratory Animal Welfare. UNSW is also required to ensure that Lead Investigators have a current Ethics approval before research activities covering live vertebrate animals commence.
- Data and Safety Monitoring - requires oversight and monitoring of human biological biomedical and behavioural intervention studies to ensure safety of participants and the validity and integrity of data. A data safety and monitoring plan is required for all applications that include clinical trials.
- Financial Conflict of Interest – promotes objectivity in research by establishing standards that provide an expectation that the design, conduct and reporting of research will be free from bias by any conflicting financial interest of an Investigator and requires UNSW to have an administrative process to identify and manage Conflicts of Interest.
- Fly America Act – generally provides that foreign air travel may only be conducted on US flag air carriers. There are limited exceptions e.g. where travel would be extended by at least 24 hours

where the travellers origin or destination airport is abroad or would increase the number of transit changes of plane by two or more or if a US carrier involuntary reroutes via a foreign flag carrier or any short distance travel of three hours or less where service by a US flag carrier would double travel time.

- Human Subjects Protections – The UNSW Ethics Secretariat maintains a Federalwide Assurance which is lodged with the US Office of Human Research Protections. UNSW is required to ensure that Lead Investigators have a current Ethics approval before research activities covering human subjects commence.
- Lobbying – federal grants cannot be used to pay any person for influencing any officer or employee of an agency or of Congress or a Member of Congress.
- Research Misconduct – UNSW is required to have written policies and procedures for addressing allegations of research misconduct and GMO submits an Assurance of Compliance with the Office of Research Integrity annually.

### **Specific requirements for Conducting and Publishing Research funded by NIH**

- NIH Post award management – you can access your grant record and submit most Reports using the NIH online system eRA Commons. Your UserID and password for eRA Commons is setup by the GMO prior to submission of your NIH application.
- Clinical Trials – requires registration and results reporting for certain studies. NIH requires progress reports to include a certification by the Lead Investigator that all required submissions have been made to ClinicalTrials.gov
- Human Stem Cell Research – NIH Guidelines on Human Stem Cell Research apply
- Acknowledgement and Disclaimer - Publications resulting from NIH grant supported research must include an acknowledgement and disclaimer as follows “This publication was made possible by **Grant No** from **Name of Awarding Office**. Its contents are solely the responsibility of the authors and do not necessarily represent the official views of the **Name of Awarding Office**.”
- Public Access Policy – NIH requires the results and outcomes of NIH funded activities to be made publicly available wherever possible. Published results of NIH funded research are made available at the NIH NLM PubMedCentral (PMC) (a free digital archive of full-text biomedical and life sciences journal literature). An electronic version of the final peer-reviewed manuscript must be submitted to PMC by the lead author upon acceptance for publication. On submission a PMC reference number (PMCID) is allocated. The NIH requires this reference number (or appropriate substitute) to be included for each NIH funded research paper cited in an NIH application or Progress Report.
- Sharing - NIH encourages the sharing of Research Resources, Data and Model Organisms generated using NIH funding.

**A full list of NIH Administrative Obligations and links to comprehensive details are available at [http://grants.nih.gov/grants/policy/nihgps\\_2011/nihgps\\_ch4.htm#public\\_policy\\_requirements\\_objectives](http://grants.nih.gov/grants/policy/nihgps_2011/nihgps_ch4.htm#public_policy_requirements_objectives)**

*Please check with the GMO in regards to publishing requirements for other US federally funded grants.*

## Part 2: What are my reporting obligations?

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### Post-Award Management

You can access your grant record using your zID and zPass to login to UNSW's grant management system, InfoED. See <https://research.unsw.edu.au/infoed> for further information on access.

### Annual and Final Reporting Requirements

Practices for reporting on yearly progress and financial status differ between US federally-funded schemes. Please check the individual conditions of your grant for more information (websites of major US Sponsors are listed at the end of this document) or seek assistance from your Grants Officer at the GMO- see <https://research.unsw.edu.au/gmo-staff-contact-list>. Your upcoming reporting requirements will also be available for you to view in InfoEd.

### NIH Annual Reports

- Annual Progress Report – due 45 days before the next budget year start date in the form of a non-competing continuation application. An abbreviated Progress Report can usually be completed and submitted electronically through the SNAP function in eRA Commons by the Lead Investigator and this will be confirmed in the Notice of Award.
- Annual Financial Status Report – due 90 days after the end of each budget year. The Report is completed and submitted electronically through the FFR function in eRA Commons by the GMO.

### NIH Final Reports

- Final Progress Report – due within 90 days after the last day of the final budget period. The report is completed and submitted through the Closeout function of eRA Commons by the Lead Investigator.
- Final financial Statement – due within 90 days after the last day of the final budget period IMPORTANT as unspent funds need to be returned to the NIH all project expenditure should be completed well before the reporting due date. The Report is completed and submitted electronically through the FFR function in eRA Commons by the GMO.
- Final Invention Statement – due within 90 days after the last day of the final budget period – Form HHS 568. The statement is completed and submitted through the Closeout function of eRA Commons by the Lead Investigator.

### US Federal Funding Audit Reports

Organisations who expend >US\$500,000 in US Federal awards in any fiscal year are subject to an audit requirement called an A-133 audit. The GMO arranges this annual audit.

Time and Effort Reporting- Time and Effort Reporting is required by US Federal regulation and University policy for all individuals working on US Federally funded projects.

**Each individual** involved in the project is responsible for certifying that:

1. Effort supported (paid) by a US federally sponsored project has been performed as promised;
2. Effort expended in support of a US federally sponsored project but not paid by the project has been performed as promised.

Anyone certifying effort for another individual must credibly have firsthand knowledge of the individual's actual effort.

### **Variations to the original proposal**

Significant changes to your project may require a variation to be submitted. You should contact the GMO for specific advice in each case, but some common variations include:

- Carry forward of unspent funds to next budget period – requires approval if the carry forward required exceeds a specified % of total approved budget for the year being reported. Typically an explanation and plan for expenditure in the subsequent year must be included in the Annual Progress Report submitted by the Lead Investigator. The approval decision is included in the terms of the Notice of Award for the subsequent year.
- Budget change – does not need approval unless there is also a related change to the scope of the research project
- Extension of final budget period – if the project term needs to be extended to complete the project this request must be submitted through the GMO to the Federal Sponsor for approval.
- For NIH funded grants a once only extension of up to 12 months can be automatically approved by the Grantee's Organisation. The GMO submits the extension notification to NIH through the SNAP function in era Commons after receiving a request from the Lead Investigator. This must be processed prior to the current project end date. Additional or late no cost extension requests must be submitted through the GMO to NIH for approval.
- Change in the scope of the project – any planned change to the aims, objectives, purpose or significant budget changes must be submitted through the GMO to the Federal Sponsor for prior approval.
- Change to Senior/Key Personnel – changes to the time commitment, an absence of > 3 months or removal or addition of Senior/Key Personnel must be submitted through the GMO to the Federal Sponsor for prior approval

### **Part 3: Where can I find more information?**

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#### **Major US Sponsor Websites**

- Congressionally Directed Medical Research Programs (CDMRP)- <http://cdmrp.army.mil/default.shtml>
- National Science Foundation (NSF)- <http://www.nsf.gov/>
- National Institutes of Health (NIH)- <http://www.nih.gov/>
- Office of Naval Research- <http://www.onr.navy.mil/>
- USAid- <http://www.usaid.gov/>
- US Air Force Academy- <http://www.usafa.edu/df/dfe/dfer/?catname=research>
- US Department of Agriculture- <http://www.usda.gov/wps/portal/usda/usdahome>
- US Department of Air Force - <http://www.af.mil/>
- US Department of Commerce- <http://www.commerce.gov/>
- US Department of Defence - <http://www.defense.gov/>
- US Department of the Army- <http://www.army.mil/>

### Further Information on Policy

- Federal Demonstration Partnership website- US Government-University Research partnerships  
<http://sites.nationalacademies.org/pga/fdp/index.htm>
- The White House Office of Management and Budget provides documentation on Circulars-  
[http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default)
- NIH list of policies-  
[http://grants.nih.gov/grants/policy/nihgps\\_2011/nihgps\\_ch4.htm#public\\_policy\\_requirements\\_objectives](http://grants.nih.gov/grants/policy/nihgps_2011/nihgps_ch4.htm#public_policy_requirements_objectives)
- NSF Grant Proposal Guide- [http://www.nsf.gov/pubs/gpg/nsf04\\_23/](http://www.nsf.gov/pubs/gpg/nsf04_23/)
- CDMRP frequently asked questions- <http://cdmrp.army.mil/funding/faq.shtml>