

ORPA FAQs

1. Can a PI be listed at 0% effort in a proposal budget?

Per the UR effort reporting policy:

Faculty members are expected to propose either some level of effort (1% or more) or the minimum level of effort required by the program or proposal on which they are listed as principal investigator or key personnel, unless specifically exempted by the sponsor.

This is a reasonable expectation since a principal investigator has responsibility for the scientific, administrative and financial management of a sponsored project, and fulfilling those responsibilities takes time.

This requirement is not applicable to equipment awards, dissertation or training awards, other limited purpose awards (e.g., travel grants, conference grants).

Furthermore, if the salary and fringe associated with this effort is not included in the budget please complete the cost sharing section of the signoff and obtain approval from the appropriate Dean's office before routing the signoff to ORPA. If the proposal is funded a cost sharing commitment form will be requested at that time.

2. I received an automated Just-in-Time request from the eRA commons. What does this mean?

Applications receiving an impact score of 40 or less will receive a standard notice and request for submitting Just-in-Time (JIT) information. Typically, ORPA suggests that JIT documents not be submitted unless requested by the NIH Program Officer or Grants Management Specialist.

However, if you know you have a fundable score, please do not wait for that official request to begin preparing the necessary documentation. In this instance, please use the automated e-mail to begin completing your RSRB and/or UCAR application(s). Please note: RSRB will process your application only if they know you have a fundable score.

Once you have received the official request and have all the required JIT documentation, please work with your Departmental Research Administrator and your ORPA Research Administrator to upload and submit your JIT documentation.

3. What happens if a NIH deadline falls on a Federal holiday or weekend?

The deadline is automatically extended to the next business day.

4. I submitted an application to NIH. How long do I have to correct any errors?

Any submissions to correct errors or warnings MUST be done before the submission deadline (5PM local time of the due date) for the application to move forward for consideration by NIH. Submissions made after the deadline will overwrite the previous submission; these are subject to the late policy and are rarely accepted.

5. Will ORPA automatically extend a subaward each year?

No. You will need to send an e-mail to your ORPA Research Administrator with a budget attached requesting that the subaward be extended.

6. How do I calculate UR F&A costs when a subcontract is involved?

Subcontractor costs are included in the UR budget as a direct cost to the UR. When estimating UR F&A costs, exclude that portion of each subagreement contained in the proposal that exceeds \$25,000.

Normally F&A costs should only be applied to the first \$25,000 of each subagreement issued under any government-sponsored prime award regardless of the number of budget periods involved during performance. Subcontracts budgeted on awards that assess UR F&A on a Total Direct Cost (TDC) basis (e.g. industry or foundation awards) are subject to UR F&A on the full amount of the subaward, not just on the first \$25,000. Any waiver of the UR F&A costs on the subagreement cost requires the approval of the appropriate Dean's office.

7. When preparing an NIH proposal do the subcontract indirects count towards the \$500,000 direct cost threshold for which prior approval is needed before submission?

No. Consortium F&A costs are NOT included as part of the direct cost base when determining whether prior approval is needed to submit an application.

8. How do I request a no-cost extension?

ORPA has the authority to approve a first no-cost extension on most federal grants, including NIH. For audit purposes though, the PI must email their ORPA RA with a scientific justification for the extension. A no-cost extension can be requested and processed if:

- Additional time beyond the established expiration date is required to ensure adequate completion of the originally approved project.
- Continuity of grant support is required while a competing continuation application is under review.
- The extension is necessary to permit an orderly phase-out of a project that will not receive continued support.

•The e-mail should include confirmation that the extension is not being exercised merely for the purpose of using an unobligated balance.

• In addition, the email should clearly note if a 6, 9 or 12 months no-cost extension is needed. If the grant involves human subject research and/or animals, the ORPA RA will need current IRB or IACUC approvals before they can process the extension.

• And finally, the email should also clarify the proposed effort to be devoted during the no-cost extension period of all key personnel named on the sponsor's Notice of Award (the PI is always key but sometimes, the Sponsor identifies other investigators as key). Unless we notify the sponsor otherwise, it is assumed that effort will remain the same during that period. If effort will be significantly reduced (i.e. a reduction of 25% or more from what was originally approved), we will need to request approval for the reduction in effort from the sponsor at least 30 days prior to the end date.

If effort will not be significantly reduced, the department will need to determine if sufficient funds remain in the grant account to cover that effort during the whole no-cost period. If insufficient funds remain, an internal cost-sharing form will need to be completed and sent to the ORPA RA.

• The request for the extension should be provided to the ORPA RA at least 20 business days prior to the projected end date.

For second no-cost extensions, prior approval from sponsor is always required. Contact your ORPA RA for additional guidance on second no-cost extension requests.

9. How do I calculate the unobligated balance on an NIH award to answer question G.10A of the RPPR: *Is it anticipated that an estimated unobligated balance (including prior year carryover) will be greater than 25% of the current year's total approved budget?*

The *total approved budget* equals the current fiscal year award authorization plus any approved carryover of funds from a prior year(s). The numerator equals the total amount available for carryover and the denominator equals the current year's total approved budget. The unobligated balance worksheet, found at the ORPA website <http://www.rochester.edu/orpa/forms/>, will help you to determine whether or not the unobligated balance will be greater than 25%.

10. If a PI plans to cost share all of their effort for an award under which the salary cap applies, should I list the salary cap on the cost share form or the full salary amount?

The full salary amount must be used on the form, otherwise we would not be capturing the full cost of the project.

11. How do I know if one of my PIs has an upcoming NIH RPPR due for submission?

Log into eRACommons and obtain the NIH Pending Progress Report List for this institution.

1. Go to <https://public.era.nih.gov/commons/public/quickqueries/progressReportByIpf.era>
2. Click on IPF Number Search
3. Enter University of Rochester in the search box and hit Run Query or enter
4. Click on the IPF Code, 7047101
5. Search results will appear
6. Sort by due date

12. How do I know if the PI submits his/her own NIH RPPR, or if ORPA is required to submit?

There are two places to obtain this information. First, the NIH NOGA states whether it is subject to SNAP or excluded from SNAP. The PI may submit any RPPR that is subject to SNAP. Secondly, if you run the report in #11 above, there is a SNAP column. If an asterisk appears in the SNAP column, the RPPR is submitted by the PI. ORPA submits for all non-SNAP RPPRs.

13. When does ORPA require a University of Rochester Sign off Form in the NIH RPPR process?

ORPA requires UR Sign off for all RPPRs that are submitted by ORPA.