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NRSA Research Training Grants

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A. Training Grants

1. Do Training Grants have pre-award cost authority?

Policies governing expenditure of funds on training grants are those permitted in the [NIH Grants Policy Statement](#). This would apply to both pre and post award expenditures of all costs--stipends, tuition, trainee travel and training related expenses. However, it must be noted that stipends and tuition costs may not be charged to the grant before the appointment is actually made. Since an appointment period cannot start before the budget period, grantees may not use pre-award costs for either stipends or tuition.

2. NIH uses a formula to calculate what would be awarded for tuition/fees and training related expenses. Should the grantee use this formula as part of their requested budget in a competitive grant?

No. Grantees are advised to continue to request full needs in these categories. Any formula will be applied by the awarding component at the time of the award. Citations: the NIH T32 Program Announcement. See most recent training program announcements in the T-Kiosk: http://grants.nih.gov/training/T_Table.htm.

3. Are grantees required to use the same tuition formula for actual expenditures?

No. The formula is used for award calculation purposes only. Funds are awarded in a lump sum and grantees are free to expend these as best meets their actual needs.

4. In a non-competing continuation application, what should the grantee request for tuition/fees?

While the grantee can request actual needs, be aware that awards will likely be made at the committed tuition level, unless actual is less. The formula used at the time of the competitive award provides no increase in future years.

5. Can a trainee be appointed to a grant if he/she has applied for his green card (permanent residency) but hasn't received it yet?

No. For training grants, citizenship/permanent residency requirements must be met at the time of the appointment.

6. Is there a consistent receipt date for renewal (formerly competing continuation) training grant applications across the NIH?

No. While many use the three standard dates of January 25, May 25, and September 25, a number of ICs use only one or two of these dates. See most recent training

program announcements in the T-Kiosk: http://grants.nih.gov/training/T_Table.htm. Applicants should contact the awarding components for verification.

7. **Are there forms for the tables that are requested in the grant application?**
Yes. See [Fillable Institutional Research Training Grant Application Forms and Data Tables](#).
8. **How should training grant PD/PIs calculate their program completion rates for reporting on Table 12A?**
A training grant's completion rate should be calculated based on students entering the institution's graduate programs ten years prior to the reporting year. For example, when reporting for 2009-2010, programs should report on the percentage of students that began graduate studies at their institution ten years earlier (i.e., academic year 2000-2001) and that were supported by the training grant at any point within that 10-year timeframe. If all of those students have completed a Ph.D. by the ten-year mark, the completion rate will be 100%. If some students have left the program without a Ph.D., transferred to medical school or another doctoral-level professional program, or are still in training, the completion rate should be reduced accordingly. Individuals transferring to or from Ph.D. programs in similar fields at other institutions should be excluded from both the entering and graduating cohorts in calculating the completion rate.
9. **Can a grantee ask for more slots in the renewal (formerly competing continuation)? Is there a limit?**
A grantee may increase the request for slots, and there is no limit unless stated in the applicable Program Announcement (see http://grants.nih.gov/training/T_Table.htm). However, any slot level must be well justified, showing that the program has an adequate applicant pool and faculty resources to support the request.
10. **In a renewal (formerly competing continuation), should the grantee list all trainees in the program or only those supported by the T32?**
As indicated in the instructions in the [PHS 398 application kit](#), programs should include data for all trainees who were or are supported by the training grant.
11. **Should a list of trainee publications be included in the renewal (formerly competing continuation)?**
Yes. However, this is only one of the data items requested. Grantees should follow the instructions provided in the 398 application kit and/or consult the awarding component for advice.
12. **Is there a consistent receipt date for non-competing (Type 5s) training grant applications across the NIH?**
No. A number of awarding components have special receipt dates, so each should be contacted for specifics.
13. **Does a trainee have to pay taxes on stipends?**
The interpretation and implementation of the tax laws are the domain of the IRS. NIH takes no position on the status of a particular taxpayer, nor does it have the authority to dispense tax advice. Having said that, some modest guidance is provided in the NRSA Guidelines on stipend taxability. Refer to NIH Grants Policy Statement—Taxability of Stipends (http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPs_Part10.htm).
14. **Can funds be rebudgeted between budget categories?**
It depends on the specific cost. See section on "[Rebudgeting of Funds](#)" in the [NIH Grants Policy Statement](#).
15. **A postdoc individual got his Ph.D. two months ago. What is the appropriate stipend level?**
The first level—"0" years of experience.
16. **What is the appropriate level of support for an individual with a health**

professional doctoral degree (e.g., M.D., D.V.M., Pharm.D.) enrolled in a predoctoral Ph.D. program?

Individuals holding doctoral-level health professional degrees should be supported as postdocs.

17. **Can unobligated funds be carried forward?**
For most training grants at the NIH, expanded authorities do not apply, thus automatic carryover of an unexpended balance is not permitted. For these grants, carryover of any monies would require awarding component prior approval. However, some NIH ICs have included training grants under the Expanded Authorities. In that case, automatic carryover would be possible. Grantees should consult the notice of award (NoA) and/or the grants management specialist for more specific information.
18. **A training grant has a budget start date of 7/1. Do all trainees need to be appointed 7/1? What does a grantee do if a trainee doesn't start until 9/1—must the appointment be restricted to only 10 months?**
Trainees can be appointed at any time during a budget period, for an entire 12-month period. In doing so, the entire 12-month stipend and tuition is charged to the current year. Thus, an appointment period can technically overlap into the next budget period. Since the entire 12-months stipend and tuition is charged at the time of the appointment, that amount not yet expended at the end of the budget should be reported as an unliquidated obligation on the FSR.
19. **Can unexpended trainee travel and training related expenses be reported as unliquidated obligations?**
Not as a general rule. An unliquidated obligation is a cost that has been incurred but not yet paid or recorded. Although stipends and tuition are obligated for the full 12-month appointment from the budget period in which the appointment is initiated, this is not true for trainee travel or training related expenses. Charges from these categories are only made to the grant when actual expenditures are incurred. Therefore, only an actual charge for travel or training related expenses that has not cleared before the end of a budget period can be treated as an unliquidated obligation.
20. **Is a Payback Agreement required for all "New Appointment" postdoctoral trainees?**
Only if the appointment is their initial 12-months of postdoctoral NRSA support. If the trainee received any other NRSA postdoctoral support that totals 12 months, on either another training grant or fellowship, a payback agreement would not be required.
21. **An award included stipends for two postdocs at level 1. The actual trainees are one at level 1 but the other is at level 3. What can be done?**
Each IC deals with this issue differently. Some expect grantees to rebudget to accommodate this type of change within the total amount already awarded. Others are able to provide additional funds. The specific awarding component should be consulted when this issue arises.
22. **Under the new reimbursement policy, how much support may a grantee request under each category??**
The new policy effects only the reimbursement of tuition, and fees, and training related expenses. Levels for Trainee Travel remain the same. Since these vary among the awarding components, specific Program Announcements should be consulted. While grantees can request their actual needs, be aware that awarding ICs may make adjustments at the time of the award (see also [NOT-OD-06-093](#)).
23. **Does the NIH cap on total student compensation apply to NRSA?**
No, the NIH cap is not an NRSA cap. This is the cap for graduate student compensation on research grants ([NOT-OD-02-017](#))—not training grants.
24. **Is there a way to procure an additional slot on a training grant for a member of an underrepresented racial/ethnic group, or an individual with disability, or an individual from a disadvantaged background when all of the slots are**

already filled??

Perhaps. However, there are a number of factors that weigh into the decision, e.g., how many such individuals are already supported, institutional commitment, etc. The specific awarding component should be contacted for guidance.

25. **Can the salary/benefits of the program director and/or co-director be charged to the training grant?**
Training Related Expenses can be used to help defray such costs as staff salaries. However, such charges must meet the test of allocability and reasonableness.
26. **Can the cost of pizza and soda served at a seminar or meeting be charged to the training grant?**
No. Described in this manner, these would be considered entertainment costs and as such are unallowable.
27. **A training grant is awarded with five predoc and three postdoc positions. Can the grantee substitute a predoc for a postdoc?**
Perhaps. Again, ICs handle this situation differently. Some ICs allow this, but only with prior approval. Other ICs do not require prior approval for such a switch. The specific awarding component should be consulted.
28. **A training grant is in a no-cost extension. Can a brand new trainee be appointed during this period?**
NRSA policy does not prohibit such an appointment; however, the limited training experience a new trainee would receive could be a factor in whether or not the appointment is accepted. In addition, many ICs restrict appointments during an extension phase to only existing trainees by using a special term and condition on the award. Grantees should consult the notice of award (NoA) and/or the grants management specialist for more specific information.
29. **Can the cost of recruiting trainees be charged to the training grant?**
Excerpt from the [NIH Grants Policy Statement](#): "Project funds may not be used for a prospective trainee's travel costs to or from the grantee institution for the purpose of recruitment. However, other costs incurred in connection with recruitment under training or manpower programs, e.g., advertising, may be allocated to a grant-supported project according to the provisions of the applicable cost principles concerning recruitment costs."
30. **Can a trainee be supported on an NIH research grant at the same time they are receiving a stipend from an NRSA grant?**
PHS funds may not be used to supplement an NRSA stipend. Furthermore, trainees are required to devote full-time effort to the training program. However, a trainee may receive separate compensation from an NIH grant when employed for services such as laboratory assistant, on a limited part-time basis. Compensation may not be paid from a research grant that supports the same research that is part of the trainee's planned training experience. Under no circumstances may the conditions of the employment interfere with, detract from, or prolong the trainee's approved NRSA training program. For additional information see "[Stipend Supplementation, Compensation, and Other Income](#)" section of the [NIH Grants Policy Statement](#).
31. **Can a prebaccalaureate student (MARC or COR) be supported under both the prebaccalaureate training program (T34) and a short-term T35 training program?**
No. Since a MARC or COR student receives a stipend from the T34 on a twelve-month basis, he/she cannot participate concurrently in a T35 program. That would constitute duplicative support from Federal funding.



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