

***Grant Administration Policies in Family Medicine are intended*** *to improve collaboration and transparency in the management of the pre-award and post-award process*

**Pre-Award Administration**

The SOM Research Administrative Services (RAS) unit will provide pre-award administrative support for ALL grants to be submitted by DFMPHS faculty, including subcontracts to grants submitted to a funder by another institution. Faculty will directly contact RAS to develop the administrative component of the grant application. Faculty who plan to submit any type of grant/subcontract, including applications for internal funding, should initiate contact with RAS as soon as possible by email: RAS@med.wayne.edu with a copy to swilliams@wayne.edu

Email RAS to inform them of an intended grant submission and to begin development of the administrative components of a grant with no more than one subcontract must occur no later than *3 weeks* prior to the deadline for submission to the sponsoring agency. If the grant has more than one subcontract and/or is complex (center grants, training grants, etc.), more time should be allowed for preparation of the administrative components and contact with RAS should be initiated at least 6 weeks in advance of the submission deadline.

* **Cost share and in-kind commitments for proposals**
	+ Cost sharing generally refers to the performance of activities for a grant or contract in the absence of any funds for salary support. Participation in such activities requires the approval of the Department Chair.  Cost sharing that is not explicitly stated to be required by the sponsor is prohibited by the SOM and cannot (unless approved) be referenced in either the budget narrative or technical proposal. See http://research.wayne.edu/spa/pdf/cost\_sharing\_commitment\_form.pdf
* **Indirect costs**
	+ In some cases, the indirect cost rate is not specified by the funder or may be scored as part of the budget. In such cases, identifying an acceptable indirect rate must be discussed with the Associate Chair for Research. All request to set or waive indirect costs requires multiple levels of approval. See: <http://research.wayne.edu/spa/pdf/spa-idc-waiver.pdf>
* **Non-NIH/NSF grants (e.g. PCORI, national foundations, local foundations, state government)**
	+ Discuss plans with Division Director or Associate Chair for Research prior to preparation as there may be specific issues to be considered that impede success.
* **JIT – Just in Time**
	+ The electronic submittal of additional grant application information after the completion of the peer review, and prior to funding. This may include requests for Other Support, Budget, IACUC, IRB, and/or Human Subject Assurances information.  Typically NIH requests the information noted in their JIT communication be uploaded into the "JIT" feature within eRA Commons. This can be accomplished by logging into [eRA Commons](https://public.era.nih.gov/commons/public/login.do?TYPE=33554433&REALMOID=06-1edb031f-46c7-44b3-b803-60b537de74d2&GUID=&SMAUTHREASON=0&METHOD=GET&SMAGENTNAME=-SM-938PYmoLVb4VrDeXo04LZUDVDvc%2B3899ByInEAjuSUvWNIGfB2zRpWiCivYGCogG&TARGET=-SM-http%3A%2F%2Fpub) and accessing the appropriate grant. To the right of the grant information should be a "JIT" link. Once selected, you will be taken to a web page where the information can be uploaded and saved. Once complete, please route to your Grants & Contracts Officer so he/she may submit the information as the authorized official for the University. Please note if IACUC or IRB dates are requested, please provide a copy of the one page IACUC or IRB approval with your email to your GCO.  Additionally, if NIH requests the information be emailed through the Business Office, please compile the necessary information in PDF format and forward NIH's JIT request email and attachments to your GCO with a request to submit to NIH.

**Post Award Administration**

Post-award activities occur between the time the Principal Investigator (PI) is notified of an award and the time when the award closeout process begins for sponsored program accounts.

* **Notification of grant/contract award**
	+ PI should send the notice of award, amendment, contract agreement, etc. to the DFMPHS grant administrator as soon as the documents are received. (Only PI and the Sponsored Program Administration (SPA) receive notice of award.) The grant administrator will work with SPA to set up the index in the WSU financial management system. All rebudgeting of funds (e.g., due to the sponsor reducing budget, disallowing specific costs, et.c) is done with department grant administrator (not RAS).
* **Researcher's Dashboard**
	+ Dashboard provides a system to access pre- and post- award grants administration data such as internal approval status, contract status, accounting information, current labor distribution and imaged documents (award documents, GFAs, etc.). Principal Investigators can access the Dashboard by [logging in to Academica](https://login.wayne.edu/). Researchers will have access to their individual proposals and awards, if proposal and/or award information is presently in Evisions.
	+ See the Dashboard User Manual <https://research.wayne.edu/spa/pdf/dashboard-user-manual.pdf>
* **Effort Changes (changes in labor distribution) for individuals funded on grants or contracts**
	+ The PI is required to provide 2 weeks advance notice of any change in FTE effort by working with the department grant administrator. This includes effort on projects for which faculty in other WSU departments or schools serve as the PI. The PI must ensure that any relevant sponsor regulations are followed (e.g. NIH does not allow changes of more than 25% in effort by investigators without prior approval.)
	+ For department faculty who are co-investigators (co-I) on grants with a PI in another department of WSU, notification of change in effort should be reported to DFMPHS grant administrator. Similarly, the department grant administrator will consult with the faculty co-I if a change in effort is requested by the PI/administrator of another department without evidence of the co-I’s awareness of the change. Retroactive changes in labor are highly discouraged.
* **Progress Reports (e.g. RPPR)**
	+ PI should provide 1 month advance notice to the department grant administrator when a progress report is due. The grant administrator will work with the PI and with SPA to determine the budget balance, prepare any needed financial status reports (FSR), and project the budget for the next period, if the award is continuing. The final progress report is more extensive and requires additional review to reconcile all expenditures, so allow more time for its completion.
* **No-Cost Extension Procedures**

*Non-federal awards*

* + No-cost extensions of non-federal awards will almost always require approval from the sponsor. If guidelines for extending the budget period are not included in the terms and conditions of the award, SPA will contact the sponsor on behalf of the PI (see Procedures for Obtaining a No-cost Extension below).

*Federal awards*

* + Regulations typically allow institutions such as WSU to internally approve a one-time extension of the expiration date of an award for up to 12 months. (These regulations are subject to change and it cannot be assumed will continue; in addition, check the terms and conditions in the notice of award for potential restrictions on such extensions.) The extension may be issued unless one or more of the following conditions/restrictions apply:
* The terms and conditions of the award prohibit the extension.
* The extension requires additional federal funds.
* The extension involves any change in the approved objectives or scope of the project.
	+ For extensions longer than 12 months (e.g. a second year of no-cost extension), sponsor approval must be requested. If WSU approves a request for an extension of less than 12 months and the PI subsequently wishes to lengthen that time period to 12 months or longer, sponsor approval must be obtained.

*Procedures for obtaining a no-cost extension*

* + The Letter of Request. The PI must prepare a letter describing the need for an additional period of time to complete the project objectives. The letter must address programmatic issues and may describe justifiable delays, such as the loss of a skilled technician. The fact that there may be money remaining in the project's account is not sufficient reason for an extension. If sponsor approval must be sought, the letter should be addressed to the sponsor grants officer, but sent first to SPA for an authorizing signature. If WSU has been given the authority to approve the no-cost extension, the request should be addressed to the PI's post-award officer in SPA.
	+ The Timing of the Request. If sponsor approval must be sought, and if the sponsor is a federal sponsor, requests to extend a project period must be received by the agency at least 10 days before the expiration date of the grant, unless otherwise specified. The PI will need to provide the letter to SPA for review and authorization before it is mailed to the sponsor. If the sponsor is a non-federal sponsor, the award document should be consulted for requirements regarding the timing of the request.
	+ See the above policy on Cost-Sharing. In a no-cost extension period, salary support for the PI may no longer be available, while funds for other staff (e.g. research assistants) may still be available. In such cases, approval for salary cost sharing must be sought from the department grants administrator who will take the request to the department chair. The Letter of Request must overtly state that the PI salary will be cost-shared, along with the specific amount of effort to be cost-shared.