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NIDA T32 TRAINING

Purpose

- NIDA has been accruing unobligated balances on the T32 programs. This is jeopardizing the program.
- Clarify policies and procedures to rectify this situation, specifically related to:
 - Appointments
 - Allowable costs
 - Unobligated vs unliquidated balances

APPOINTMENTS

Length of Appointments

- Trainees are considered full-time participants in the training program
- 9-12 month appointments
- Less than 9 months not allowed unless there is written assurance that individual will be immediately reappointed in subsequent year. Cumulative training period must be at least 9 months

When Appointments Can be Made

- Appointment may begin anytime during the budget period
- In the last year of the grant - New appointments are only allowed under the following circumstances:
 - New trainee(s) require(s) support under this mech for only a brief time, or
 - There is a contingency plan in place to provide continuous support for the trainee(s), should the competing application not be awarded.
 - Written request accompanied by a reasonable justification must be submitted to the assigned PO at least 2 months prior to appointment

When Appointments Can be Made

- During a **NCE**, initial appointments for trainees are not allowed. Only re-appointments of existing trainees are allowed

“Overlapping” Appointment

An appointment period may overlap budget periods. For example:

Year 9	Year 10
7/1/2010 – 6/30/2011	7/1/2011 – 6/30/2012

Appointment Period
1/1/2011 – 12/31/2011

Stipend & Tuition \$\$ (6-months reported as unliquidated obligation)

Statement of Appointment

- Due on or before the start of the appointment period – must be within 30 days
- No stipend or other allowance may be paid until submitted
- Electronic Submission through eRA Commons xTrain now required

Termination Notice

- Required at time an appointment is ending
- Reflects total period of support & NIH stipend only (do not include any supplementation)
- If there was a hiatus of support, report only current period
- Do not include support already reported on a prior Term Notice
- Electronic Submission through eRA Commons xTrain now required

xTrain – Electronic Submission of Appointment & Termination Forms

- The feature in the eRA Commons to electronically submit trainee appointments, reappointments, amendments, and Termination Notices
- Eliminates the need for signed paper forms (except for NRSA payback agreement and proof of permanent residency)
- Allows grantees to also track status and timing of trainee actions
- Use now mandated beginning with submissions on/after 1/1/2011. See Guide Notice OD-11-026: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-11-026.html>

FAQs

Q When a PI wants to add a slot mid-year (with justification) and is under IRG approved levels, can s/he do it without having his/her own unobligated balance?

A The PI can request to add the slot, but s/he will have to wait until the start of the next budget period for it to be added.

FAQs

Q PI was approved for 3 PhDs and 2 MDs but is having problems getting another PhD. Can he hire another MD instead of a PhD (even though the cost of the MD is greater than the PhD)?

A Programmatically, the decision to hire an MD vs PhD is at the discretion of the PI. If the PI doesn't have adequate funds in the budget year, this would be a good use of the PI's unobligated balance and the PI should request a carryover.

COSTS

Stipends

- NIH publishes levels in NIH Guide when increases are approved
 - Also see: <http://grants.nih.gov/training/nrsa.htm>

Predoctoral:

- One level for all individuals, regardless of years of experience
- FY 2011 Level = \$21,600

Stipends

Postdoctoral:

- Dependent on number of years of relevant experience (0 – 7)
- level set ***at time of appointment***
- Once set, no change mid-year
- Subsequent year based on initial level + 1
- Relevant Experience = research, teaching, internship, residency, clinical duties, or other time spend in a health-related field beyond the qualifying degree

Stipends

Years of Relevant Experience; FY 2011 Levels:

0 = \$38,496

1 = \$40,548

2 = \$43,476

3 = \$45,192

4 = \$46,884

5 = \$48,900

6 = \$50,382

7 = \$53,112

Stipend Supplementation

- Grantees may supplement stipends
- Using non-Federal funds
- Without additional effort or obligation to trainee/fellow
 - Amount determined according to formally established institutional policies applied to all in similar training status
 - Consistent treatment is key

Additional Compensation

- Trainees may receive additional compensation for services associated with employment (e.g., teaching assistant, lab assistant) on a limited part-time basis
- However, it cannot be same research that is part of training experience
- Individual receives salary for additional effort
- Compensation can come from a NIH research grant.
- Fellowship Sponsor or Training Grant Program Director must approve
- May not interfere with, detract from, or prolong the approved NRSA training

Costs: Stipends, Tuition

- Grantees request **full amount for tuition & fees**
- Grantees are awarded tuition and fees based on the formula:
 - Predoctoral – 60% up to \$16,000 (\$21,000 for dual degree)
 - Postdoctoral – 60% up to \$4,500 (\$16,000 for additional degree)
- Grantees can disperse the funds as needed (*not restricted to formula for actual expenses*)

Costs: Trainee Travel

- Usually per/trainee formula based for award calculation
- \$1000 cap per NIDA trainee
- Scientific meetings OK
- Cost of travel from residence to institution (unallowable)
- Training experiences away from institution OK but requires IC prior approval

Costs: Training Related Expenses

- Formula is based per trainee: \$4,200/Predoc, \$7,850/Postdoc
- Can be used for:
 - Health Insurance (if consistently applied according to Institution's policies)
 - Staff salaries
 - Consultant Costs
 - Equipment
 - Research Supplies
 - Staff travel
 - Publication costs
 - Other Expenses directly related to the training program

Rebudgeting

- No prior approval (unless restricted in the NoA) for:
 - Stipends: Into Tuition & Fees only
 - Tuition: Into Stipends only
 - Trainee Travel: any category
 - TRE: any category
- Prior approval required to rebudget stipends and/or tuition into travel or TRE

FAQs

Q Can the cost of pizza served at a seminar be charged to a T?

A It depends. If it can be documented that the meeting's primary purpose is to disseminate technical information, then the cost of meals is allowable. However this has to be in line with written institutional policy and the costs need to meet a test of reasonableness.

Allocation: since the seminar is probably attended by others not supported by the training grant, only a portion of such costs should be allocated to the grant.

FAQs

Q Is health insurance excluded from the F&A base?

A No, health insurance is now part of TRE and is no longer excluded from the base.

UNOBLIGATED VS. UNLIQUIDATED

Unliquidated Obligation

- Any trainee cost that has been obligated but has not been expended by the end of the budget period (June 30)
- Reported on the FFR
- Unless appointments start on the 1st day of the budget period (July 1), most programs will incur an unliquidated obligation

Unliquidated Obligation

Q Can health insurance be reported as part of the unliquidated obligation?

A It depends on how the institution obligates this cost; particularly now that it is part of the training related expenses category (and not tuition/fees). If the entire amount is obligated at the time of initial appointment (*as the case for stipends*) then yes, that portion that is not fully expended at the end of the budget period may be included in the unliquidated obligation.

Any portion *not* obligated at the time of initial appointment becomes unobligated balance at the end of the budget period, unless appointing on July
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Unobligated Balance

- All trainee related costs that have not been used or obligated during the budget period
- Institutions are restricted from using any unobligated balance without prior approval from NIDA

Unliquidated vs. unobligated Balance

- Unliquidated Obligations are obligations that have been incurred, but not yet paid for.
- These amounts do not accrue from year to year and are not contributing to our current unobligated balance problem

FAQs

Q Does trainee leave contribute to my unobligated balance?

A No. The trainee continues to receive a stipend for up to 15 days if on sick leave, or up to 60 days if on parental leave.

If the leave is extended, prior NIDA approval must be obtained for a leave of absence and the trainee must be terminated then reappointed upon return.

Expenditure Reporting on the FFR

- Required annually 90 days after end of calendar quarter in which budget period ends
- Example: Budget period ends **6/30**; Expenditure report of FFR due **9/30**
- Expenditure reporting of FFR required through eRA Commons
- Unliquidated obligations can be used to report any stipends and tuition charges for “overlapping” appointments
- Automatic Carryover of an unobligated balance is not allowed

New Policy for Newly Accrued Unobligated Balances

- Starting at the end of the current budget year, NIDA will offset 50% of the unobligated balance accrued during the current budget year.
- Offset is the decrease of the current FY's dollars by partially paying the current year's grant with funds from a prior year
- NIDA Budget Office reserves the right to offset any portion of the currently existing unobligated balance in order to rectify the current problem

New Policy (cont.)

- The 50% offset policy will not affect the large unobligated balances that currently exist
- In no case will any of these policies affect the number of slots that are awarded or the amount awarded in subsequent years

How to Request Use of Unobligated Balance

- If all allocated slots are not filled, request will not be considered
- Institution must submit written request signed by authorized organizational official for “carry over” (aka carry forward) of unobligated balance

How to Request Use of Unobligated Balance (cont.)

- Detailed budget (PHS 2590 form page 2 and checklist), explanation for existing unobligated balance, and detailed justification for the use of funds must be included in the request
- Request must be in PDF format and sent to PO and GMS

How to Request Use of Unobligated Balance (cont.)

- If approved, a revised NoA will be issued, allowing the grantee to spend funds carried forward from the previous FY / budget period
- This will effectively increase the approved budget, yet the Total Federal Award Amount remains unchanged since “new” dollars are not being added

Unobligated Bal Request – Allowable Costs

- Carry over of unobligated balance can be used towards additional slots and associated costs
- Will not pay for costs above travel cap, and will not supplement stipend, TRE, or other costs set by NIH for already appointed trainees
- Requesting slots up to IRG approved levels: formal request from institution must be sent to GMS – RTC review & approval of request required
- Requesting slots above IRG approved levels: administrative supplement appl must be submitted – RTC review & approval of request required

FAQs

Q Can I use my unobligated balance to appoint a higher level postdoc than I am budgeted for?

A Yes. This is an acceptable way to use your unobligated balance, but carryover must first be requested and approved.

QUARTERLY PROGRESS REPORTS

Quarterly Progress Reports

- Due January 1, 2012, April 1, 2012, July 1, 2011
 - PIs must submit a **brief report** to the PO and GMS by email on a quarterly basis outlining:
 - The number of trainee slots filled at the time the quarterly report is submitted; and whether appointment forms (when applicable) have been submitted to NIDA through X-Train
 - The name of each trainee
 - The appointment period for each trainee
 - The number of trainee slots that remain unfilled at the time the quarterly report is submitted
- **Regular annual progress reports must still be submitted**

Quarterly Progress Reports

- Quarterly reports will be reviewed by NIDA
- Additional information may be requested
- PO will communicate any issues and may recommend course corrections

Example

PI was approved for 3 level 7 postdocs but was only able to recruit level 1 postdocs.

- For that year, 50% of the unobligated balance that accrues will be offset unless it is rebudgeted appropriately
- The PO must get assurances from the PI that they will be able to recruit level 7 postdocs the following year. If they cannot get such assurances, NIDA will reduce the level of postdoc awarded for the subsequent year.

Other Resources

- NIH Training Website:
<http://grants.nih.gov/training/nrsa.htm#policy>
- T Kiosk (FOAs): http://grants.nih.gov/training/T_Table.htm
- F Kiosk (FOAs): http://grants.nih.gov/training/F_files_nrsa.htm
- NRSA Chapter in NIH GPS:
http://grants.nih.gov/grants/policy/nihgps_2010/nihgps_ch11.htm#_Toc271265032
- Training Grant Instructions: See Section 8 of the SF424 (R&R) Application Guide: <http://grants.nih.gov/grants/funding/424/index.htm>
- xTrain Resources: http://era.nih.gov/training_career/index.cfm
 - Includes User Guide, quick reference sheets, online tutorials, presentations
- Resources for Applying Electronically:
<http://grants.nih.gov/grants/ElectronicReceipt/index.htm>

Thank You
Questions?