FAQs:

- Which grant conditions apply to carry-over funds?
  - If a new increment of funding is awarded on or after December 26, 2014, the UG and NIH's Interim Grant General Conditions apply to the new money as well as to any carryforward funds. However, if a notice of award is issued just for carryforward funds, then the old guidance applies.

- Which grant conditions apply to funds that were awarded before December 26, 2014 but which have not yet been spent or obligated?
  - Any unspent or unobligated funds not expensed by December 26, 2014 on old awards will need to follow the UG and NIH's Interim Grant General Conditions.

- How should direct charges for administrative or clerical salaries be reflected in NIH modular budgets? UG § 200.413 requires that such direct charges be either explicitly included in the budget or have the prior written approval of the Federal awarding agency. Does this mean that NIH requires prior written approval for all direct charging of administrative and clerical salaries?
  - NIH prior approval is waived for direct charging of salaries of administrative and clerical staff if the conditions in 45 CFR § 75.413 are met. In order to demonstrate that these conditions are met in modular budgets, include the following in the proposal budget justification:
    1. Name of position
    2. Whether the position will be full or part time
    3. The position’s role in the project
    4. A statement explaining how the use of administrative or clerical staff meets the full requirements contained in 45 CFR Part 75 Section 413.
  - For current grants that did not include the above in the budget justification, prior approval is required.

- Is prior approval required for cost increases for fluctuations in exchange rates?
  - In most cases, NIH has waived the prior approval requirement for exchange rate fluctuations. Prior approval of exchange rate fluctuations is required only when the change would result in the need for additional federal funding or would result in a change of the project scope.

- How is NIH handling participant support costs?
  - NIH will allow participant costs on an awarded grant only if such costs were specifically stated in the Funding Opportunity Announcement.

- How is NIH implementing the UG’s rules regarding the de minimis indirect cost (IDC) rate for subrecipients?
  - If an entity does not have a negotiated IDC rate, then 10% of the modified total
direct costs must be used. NIH will continue to use 8% on training and NRSA grants (base excludes tuition/fees, health insurance, subcontracts over $25,000, and equipment). Foreign awardees are still entitled only to 8% of the MTDC, less equipment.

- What does it mean in the Uniform Guidance and NIH’s Interim Guidance on page 19 that “receiving award is NOT an indication that proposed expenses are allowable”?
  - The awardee institution must review expenses for their allowability in the cost principles, just as under the old rules.

NIH’s NEW DEFINITIONS and NEW FLEXIBLE ALLOWABILITY:

COMPUTERS: A computer is now a supply cost item if the cost is less $5,000.

OFFICE SUPPLIES: Office supplies are now allowable costs to NIH grants.

RESEARCH TERMS AND CONDITIONS OVERLAY: This term refers to the NIH’s Interim Grant General Conditions, which are in effect until the new RTC are released.

Federal Closeouts and ANNUAL 90 DAY REPORTS

Awardees now have 120 days from the end of the performance period date to close out and submit final technical reports, final invention statements, and final financial reports. This policy applies to all awards that ended on or after October 1, 2014. Any awards prior to that end date are subject to the 90-day deadline. No extensions will be given on the 120-day deadline.

NIH will be releasing a new search engine tool with the April upgrade to eRA that will show when progress reports are due in the next 120 days.