The Administrative Shell of a NIH Research Grant

(R01, R03, R15, R21)

May, 2013

http://med.umich.edu/medschool/grants/adminshell

Today we will...

- Cover most administrative sections of the grant
- Provide background & rationale for major issues
- Point out expectations from NIH & common pitfalls
Handouts

• All located on the web site

• Helpful Hints on Routing:
  http://www.med.umich.edu/medschool/grants/top10

Introductions

Heather Offhaus, Director
Jane Sierra, Manager, Grant Review
Amy Brooks, Grant Review
Claire Whittaker-Smith, Grant Review
Tracey Naylor, Training & Policy
Background

- Science is the MOST IMPORTANT!
- Administrative Shell supports the science and lists the resources
  - People Expertise
  - Space Available
  - Funds needed/provided
  - Institutional Assurances
The university...

- Wants good science to happen
- Is bound by government, sponsor, and Regents rules
- Wants to meet all commitments

*That’s why there are so many hoops to jump through!* 

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**Background**

- SF424 General Instructions
- Most concepts spread to other types of awards and other sponsors

*Note: Not RFA instructions – RFA instructions supersede these general instructions*
Multiple programs that these instructions apply to

- Regular Research (R01)
- Seed Funding (R03)
- Minority Supplements (R15)
- Exploratory/Developmental (R21)

**UM Medical School and NIH**

How many proposals does the Medical School submit a year?

How many awards has the Medical School received from NIH in the past year?
Proposals Submitted to NIH by Medical School

NIH Awards to Medical School
The Forms

Where to Find:

NIH forms and directions:
http://grants.nih.gov/grants/forms.htm
- Through the specific Parent Announcement

Individual form files

Official Application SF424
- eRPM system
Always download new files every time you apply!

- You can error out with old forms
- NIH updates the directions in a continuous online format. Watch the purple.
- NIH also posts lists of recent changes made

Type Size and Page Requirements

- Specifications must be followed or the application will be designated as incomplete and will be returned without peer review.

Fonts & Margins

The application must be clear, readily legible, and conform to the following requirements:

- **Type Font:** Arial, Helvetica, Palatino Linotype, or Georgia typeface, a black font color, and a font size of 11 points or larger.
- **Type density:** including characters and spaces, must be no more than 15 characters per inch
- **Minimum 6 lines of type** within a vertical inch
- Use 8.5” x 11” **paper size**
- **Margins, in all directions,** must be at least 1/2 inch

Format of Files

- **File Names** -- 50 characters or less
  - only use standard characters in file names: alphanumeric and underscore

- **PDF Attachments**
Page Limitations

Observe the page number limitations given in Section 2.6.1 in the 424 Application and Instructions.

- Resubmission/Revision Application Introduction 1 Page
- Specific Aims 1 Page
- Research Strategy 6 or 12 Pages (depending on FOA)
- Biosketches 4 Pages each
- Appendix no limit, but only 3 publications

http://grants.nih.gov/grants/forms_page_limits.htm#other

The NIH Division of Receipt & Referral has the responsibility to check for completeness and has the authority to return application.

http://grants.nih.gov/grants/receipt_referral.htm

The Grants.gov system is the new enforcer in town.
Components of the Administrative Shell

Proposal Approval Form (PAF)
SF424 Application:
- Cover Page
- Senior/Key Person Profiles
- Project Summary/Abstract (Statement of Work)
- Facilities & Other Resources // Equipment
- Performance Site Locations
- PHS 398 Cover Page Supplement

- Modular or R&R Budget Pages
- Budget Justification // Additional Narrative
- Multiple PI Plan
- Subcontract agreement and FCOI indication
- Letters of Support with commitments
- PHS 398 Checklist
Not required for administrative shell review:
- Biosketches
- Revised application explanations
- Science (Other than draft of abstract)
- Data sharing plans, Human and Animal Use descriptions
- Letters of Support that are “nice” and consultant letters

The Medical School submits to NIH

The science does not have to be complete until you Finalize your proposal and say “Send it”!!!**

**Barring changes that science revisions cause to the administrative shell, of course...**
Why is the administrative shell important?

- Describes how the aims are going to be accomplished
- Contains the UM provided items for project success
  - Dollar and space commitments
  - Effort spent on project
  - Description of work done on project
- Contains the institutional assurances
  - IRB, animal use dates
  - Conflict of Interest Disclosures

REMINDER

If you are using a 424 Form Set attached to a PAF, you can populate the form set with basic PAF information in eRPM.

If you populate the 424 further in the process with the PAF information, it will overwrite things you hand filled in....
SF424 (R&R) Page 1 & 2

Questions 1-4 – SF424 (R&R)

- Type of Submissions – should remain “Application”
- Date Submitted and Received stay blank
- Applicant Identifier will prepopulate with the PAF Number if you are using the pre-loaded form set in eRPM. Otherwise, use the PAF number!
- 4a Federal Identifier: 2 letters, 6 digits of any Competitive Renewal or Resubmission
Questions 5, 6, 7, 9, 10, 13, 14, 16, and 19 - SF424 (R&R)

Prepopulated –

but if ever you need more info:

http://orsp.umich.edu/proposals/proposaldata.html

8. Type of Application:
   - New – Type 1 - Never sent in before
   - Resubmission (A1) - applied & turned down (Type 1 or 2)
   - Renewal – Type 2 – next cycle of funding
   - Continuation – Type 5 – not used in applying
   - Revision – Type 3 – Supplements

11. Title:
   - Do not exceed 81 characters, including spaces between words and punctuation
14. Who are you?

- Most fields pre-populate
- Department
  Use PI's primary department
- Division
  Always Medical School

12. Dates of Project

- See Standard Receipt Dates, Review and Award Cycles Chart
  http://grants.nih.gov/grants/funding/submissionschedule.htm
- RFAs and PAs may dictate specific dates for award begin

15. Budget Figures

We’ll get back to these!
Research and Related Senior / Key Person Profile (Expanded)

- Instructions state to list last name first starting with PI, then alphabetically
- Anyone listed on this page from the UM should be on the PAF to comply with FCOI requirements regardless of effort level
- ONLY recommend Credential login (Commons User Name) for PIs
- May list up to 40 Key Personnel in total...
Roles

- NIH doesn’t recognize Co-PI

Definition of Key Person… Really!!!

- Substantive Scientific contribution
- Efforted
- Do you really want to list?

OSC? NIH Directions:

- “Other” // Text type: “Other Significant Contributor”

Biosketches

*(remember – not for administrative review!)*

Helpful Hints / Requirements for a Biosketch

http://www.med.umich.edu/medschool/grants/nih_bios.htm
Biosketches

Most important things to call attention:

- Research Support is **NOT** Other Support
  - Ongoing research or research completed in past 3 years relevant to project
  - **Do NOT** include dollars or % effort
  - **DO** include:
    - federal and non-federal projects
    - goals and roles

Project / Performance Site Location(s)
Performance Site

- You are not submitting as an individual
- Top section (Organization name and address) would prepopulate if using the 424 attached to a PAF
- You may not need any more – and then again you may....
  - VA Space
  - Subcontracts

Did you know?

Even if the full activity is at another site (e.g. VA) you must list the UM Regents and address first as we are the award recipient.....
Performance Site

- If UM owns or rents the space, it is UM space
  - Being internally charged “rent” does not make it non-UM space

- If a majority of the work of UM Personnel is done at an offsite location (e.g. VA) or the space is charged to the Federal Sponsor, it is off site.

Research and Related Other Project Information
1. Human Subjects Research

- Human Subject Assurance Number = 00004969
  - *Do not use the individual UM IRB assigned project number*
  - Individual Project Assurance is not due to NIH until there is a *likelihood* of funding

- You can mark approval Pending

- If you do list, remember approvals are valid for 1 year

2. Vertebrate Animals

- Animal Welfare Assurance Number A3114-01
  - *Do not use the individual UM assigned approval number*
  - Individual Project Assurance does not need to be processed until there is a *likelihood* of funding

- You can mark approval Pending

- Remember UM IACUC approvals are valid for 3 years
7. Project Summary / Abstract

- Does not need uploaded at time of Administrative Shell Review

- A “reasonable draft” does need to be copied into the PAF Abstract / Statement of Work section

- Do pay special attention to page and line limits in the instructions for these sections...

10. Facilities & Other Resources

11. Equipment
What are Resources?

- Anything that is available for this project to be completed
  - Space
  - Support/People
  - Equipment
  - Core Facilities

- You are required to address the institutional environment and how it benefits the project...

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Resources continued

• Why are these pages important?
  - Reviewers want to know the proposed work can be done with what is available
  - Include:
    - Location and size of lab(s) as well as proximity to other facilities
      - They don’t care about specific room numbers!
    - Extent of availability of resources for this project
What is very important to list?
Anything that is available to the project that is:
- Indispensable
- Hard to come by

Don’t assume reviewers know!!

R&R Budget
(R&R Subaward Budget)
When do you use which format?

- **Modular**
  - R01, R03, R15, R21
  - Direct Costs do not exceed $250,000 in any year

- **Categorical**
  - All other research awards (R and P Series)

What does NIH expect?

- Regardless of format, a back-up actual budget that reflects true costs

- A determination of the correct budget format to use

- A final budget which reflects the NIH budget building requirements
Building the FULL Cost Budget

- Capture the complete cost of specific aims
- No cutting corners!
  - Allows discussion of several UM specific cost requirements and budget issues
    - Most budget snares in the UM review process are not NIH issues!

http://med.umich.edu/medschool/grants/budget_templates.htm

Institutional Base Salary

- Defined as the Academic Salary at UM
- Not Full Paycheck Salary
  - NO Clin A, Clin B (No “Risk”)
- Budget based on reasonable expectation at projected start of award
Months Effort

- NIH talks in terms of months effort
  - Doesn’t matter how much you work, you can’t exceed:
    - 12 calendar months OR
    - a portion of that based on your UM FTE
  - Academic Year appointments are no different

Support requested has to be justified by the roles and responsibilities on the project

Graduate Student Research Assistants

- UM has a bargained agreement
  - Receive compensation based on full stipend for a 50% appointment

- Full time research = 6 Calendar Months **NOT 12!**
- “6 months which is equal to full time research effort”
  - Reflect institutional base as the stipend (justification important!)
  - Remember that effort requires tuition be covered

http://orsp.umich.edu/proposals/students/gsra.html
Fringe Benefits - A Real Cost

- Staff benefits in post-award are charged to sponsored project accounts on a real cost (actual) basis
  - Different salary recoveries have variable charge rates
  - Real cost can be determined by Benefits Table

http://orsp.umich.edu/proposals/budgets/staff_benefits_table.html

Benefits: Actual vs. Estimated

- An estimator is often used, based on some average percentage of salaries committed to the project

- Possible estimator is 30%
  - “Comfortably defendable” if questioned by NIH as an overall campus average
C. Equipment

- Definition of individual pieces in our DHHS Negotiated Agreement
  - Cost \(\geq \$5,000\)
  - Useful life of 2 years

Multi-Part Equipment

- May meet the definition
  - Multiple items will be connected to form one system
  - May be bought on one Purchase Order or from multiple vendors within a Fabrication Account

*Three $2500 individual items on 1 Purchase Order do not constitute a piece of equipment!*
D. Travel

- Types to budget for:
  - Professional Societies/Scientific Meetings
  - Visits to/from Collaborating sites
  - Local Travel & Parking for study subjects
  - Consultant travel (if paid directly through UM)

E. Participant Trainee Support Costs

- Highly unusual in an R-Award
  - Does NOT mean patient stipends
  - Think Training Grant
F. Other Direct Costs

“Materials and Supplies” Category Examples

- Purchase & Housing of animals
- Lab chemicals
- One-time (non) equipment purchases
- Consumable Supplies
- Tuition
- Contracted Labor Expenses
- Mailing Costs

F. Other Direct Costs

2. Publication Costs

3. Consultants

- Paid v. Not Paid Issues
- Budget line should include any requested compensation amount and can reflect their travel costs
- Letters from consultants must reflect hourly or “package” rate, not effort level
F. Other Direct Costs

5. Consortium Costs - Definition

- Funds paid to a univ/ non-profit
- Contributing to a significant portion of the scholarly/scientific conduct at their site
- Performance is of a unique nature
- They do not provide similar services to others as their primary business
- Verification of performance is required

http://orsp.umich.edu/projects/grants_contracts/subagreements.html

Consortium Costs - Components

- Site has to provide (at minimum)
  - Letter of institutional agreement or face page signed by institutional official
  - FCOI compliance information
  - Full budget showing breakdown of direct and F&A costs
- Should also request that they include
  - Biosketches
  - Resources
  - Written Justification & SOW
Consortium Costs

- The subcontract site’s direct costs AND F&A are considered a DC at UM
  - Their F&A rate is based on their negotiation with federal entities, not ours
  - Foreign sites recover 8% F&A
  - Put as a single number in Line 5.

*There is a new provision that the F&A of the subcontractor does not apply to a DC cap established in an RFA. Most proposals are unsolicited and do not qualify.*

Other Categories...

4. ADP/Computer Services

6. Equipment or Facility Rental / Use Fees

7. Alterations and Renovations
   - Has to be to provide facilities appropriate specifically to the proposed project
   - Occurs infrequently
   - If you have them and need help, call
Other Categories...

8-10 are open fields  - Use at will

Patient Care Costs
- The costs of routine and ancillary services provided by hospitals to individuals in research programs
  - *Separate those done on an inpatient basis from those done on an outpatient*
  - *Are NOT* subject volunteer fees, patient parking reimbursement, etc.

A-21 Items
- OMB Published guidelines of what may *(more may not)* be charged to a federal sponsored project without prior approval
  - Do not budget items that are not identifiable as a direct grant expense/benefit to the project
Examples of A-21 Items

- Secretarial Support
- Base charges for phone and fax lines
- Photocopying
- Subscriptions to journals/magazines
- Dues for Professional Societies

If you are going to charge these things to a Categorical budget, be ready to justify them and which specific aim they directly impact!

You’ve Found All Your Costs

It’s now time to figure out what type of budget to use.

Yep, it took that long....
Side note: $500,000 Direct Cost Rule

Proposals $500K or more Direct Costs in any year

- Prior approval at least 6 weeks prior to the submission from the NIH Institute
- Must include a cover letter identifying the program staff member and Institute
- Any application received without letter will be returned to the applicant without review
- Your subcontract F&A does not count...

Modular or Categorical?

Characteristics:

<table>
<thead>
<tr>
<th>Modular</th>
<th>Characteristic</th>
<th>Categorical</th>
</tr>
</thead>
<tbody>
<tr>
<td>• $250K or less</td>
<td><strong>Average</strong> per year</td>
<td>• $250,001 or more</td>
</tr>
<tr>
<td>• Request in $25K</td>
<td><strong>Costs</strong></td>
<td>• Request based on</td>
</tr>
<tr>
<td>Increments (&lt;= 10)</td>
<td></td>
<td>Actual</td>
</tr>
<tr>
<td>• Equal – unless</td>
<td><strong>Amount</strong> per year</td>
<td>• Varies with cost</td>
</tr>
<tr>
<td>specific anomalies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Limited Information</td>
<td><strong>Justification</strong></td>
<td>• Detailed &amp; tied to</td>
</tr>
<tr>
<td></td>
<td><strong>Format</strong></td>
<td>budget by line</td>
</tr>
</tbody>
</table>
Calculation

Average the cost over budget years
- Subcontracts – Only Direct Costs are pooled with UM Direct Costs to determine the average...

- Budgets obviously < $250,000 per year should be Modular (if an R01, R03, R15, R21)
- Obviously > $250,000 are Categorical
- Budgets +/- $250,000, should be recalculated with NIH fiscal policy in final check

Modular Specifics

Must
- Be recalculated consistent with NIH Fiscal Policy
- Be modified to reflect unequally distributed costs as appropriate

Of Note: R21 – built for uneven modules
NIH Fiscal Policy
(on a Modular Application)

3 Areas to Apply to a Modular Budget:

- DHHS Salary Cap
- GSRA Compensation Package Cap
- Inflationary Increases Cap

- Required to apply all 3 when calculating a Modular Budget request

DHHS Salary Cap
(on a Modular Application)

- Currently tied to Executive Level II pay grade ($179,700)
  – Maximum allowed Institutional Base Salary
  – Reviewed & set by Congress every federal fiscal year
  – For UYear faculty, cap is prorated based on number of months worked

- Only applies to PHS - not an all-federal cap

- If applying NIH Fiscal Policy: Use every year to calculate
GRSA Compensation Package Cap
(on a Modular Application)

- GSRA Stipend + Fringes + Tuition = Lowest Postdoc Level

- How to Budget
  - For the cap at most

Inflationary Increases for Future Years
(on a Modular Budget)

- Currently, NIH will accept only 0% inflationary increases (no Cost of Living)

- How to Budget
  - Use 0% before you average costs
Calculate Again....

After recalculation of adjusted budget

- Add all years’ direct costs and average again
- Round to nearest $25K increment
  - Any major purchases/costs that skew modules requested may be added in separately as a “stand alone” module in the dollar distribution (Still has to be less than 10 modules)

http://med.umich.edu/medschool/grants/budget_templates.htm

Modular - What to Justify

- Personnel (paid and unpaid!) - 4 items
  - Name
  - Role on Project
  - Effort
  - Duties on project

• Watch for future verbs!
Modular - What to Justify

- Any change in module amounts
  - One time equipment purchases
  - Additional required effort in future years

- Upload under “Additional Narrative” attachment

Modular - What to Justify

- Consortiums (Subcontracts) -- 4 items
  - Name of institution or entity
  - Domestic or Foreign Ownership
  - Total Costs (per year) - rounded to nearest $1,000
  - Justification of all personnel (same 4 items as before)
Modular - What NOT to Justify

- Any $$ amounts
- Any costs that are usual to the cost of doing research
- Any A-21 items

But you can clarify costs in the Additional Narrative if you feel necessary.

Categorical Budgets

May either

- **Recommended**: Show ACTUAL costs (with the expectation that NIH may adjust the budget to match guidelines at time of award)

  <OR>
  
  - Be recalculated with NIH fiscal expectations

  *Talk to your DEPARTMENT – it is their call...*
Categorical & Fiscal Policy

DHHS Salary Cap - Options to budget
- Ask for full academic salary with increases (even if it exceeds cap) for all years
- Start year 1 at cap and inflate in subsequent budget periods
- Keep at cap across all budget periods
- Regardless of method, be consistent!

GSRA Salary Cap - Ask for actual costs and let NIH reduce

Inflationary Increases - Same

Categorical- What to Justify

- Personnel (paid and unpaid!)- 2 required items
  - Name
  - Duties on project

  - Items on 424 Form - if you restate, match!!!
    - Role on Project
    - Effort
Quick Hint on Key Personnel

If someone is listed in the Senior / Key Person section of the 424 budget, they should be listed in the “Key Person Profile”

- All others go in the “Other Personnel” Section B

Categorical - What to Justify

- Equipment
  - Benefit to multiple users on the project
  - Whole system use if on a fabrication account

- Travel
  - Provide purpose and destination of each trip and the number of individuals for whom funds are requested
Categorical - What to justify

- Consultants
  - Include names and organizational affiliations, whether or not costs are involved
  - Include consultant physicians in connection with patient care and persons who serve on external monitoring boards or advisory committees to the project

Categorical - What to Justify

- Consultants - continued
  - Describe the services to be performed
  - Include the number of days of anticipated consultation, the expected rate of compensation, travel, per diem and other related costs
  - Include letters from consultants confirming their roles in the project
    (again, no effort!)
Categorical - What to justify

- A-21 items
  - Project specific - But don’t say “This is project specific.” Give a reason

- Anything that seems to be unusual
  - To the science proposed
  - Out of market-expected cost (High or Low)
  - A benefit to the NIH

The more dollar detail you include, the more there is to nit-pick!!!

There is a difference between providing enough info to get funded and too much info.

If you are reading and start to gloss over – it is too much!
H. Facilities & Administration Calculation (F&A)

- We have a DHHS negotiated agreement
- Current date is 3/2010
- Indirect Cost Type: Modified Total Direct Cost (MTDC) agreement
- Occasionally “Off-site” when space is at the VA or rent is directly charged to the budget

What is an Indirect Cost Rate (%)?

- Facilities: Lights & Water, Space
- Administration: Administrative/Secretarial Support, University Central Services

Not everything recovers F&A
F&A Usual Exclusions

– Equipment
– Tuition
– Patient Care*
– Alterations and Renovations
– Rental Space
– Subcontracted amounts over $25,000

(CUMULATIVE by site - not yearly!)

Patient Care Costs

- Excluded from F&A Base if:
  – The cost is included in the University’s negotiated Research Patient Care Cost Agreement
    ▪ Think MBECT Charges....
  – You may need to thoroughly justify/explain if it sounds like patient care, but isn’t....

If it is not one of these two conditions, it may not be appropriate for the charge to be in Patient Care... Call...
Calculating F&A Amount

- For calculating F&A recovery, yearly base is the budget form DC amount (from budget form) minus costs of exclusions
  - **Categorical** Exclusions -- Costs as listed
  - **Modular** Exclusions-- Costs off of internal ADJUSTED budget

MTDC Base * Applied F&A Rate = F&A $

Am I Done??

- Go back and populate budget information in #15, Page 2 of the Cover Page
- Carry forward numbers onto the internal routing form
- Keep a copy of your Full Cost budget and underlying internal budget (if modular) so you have notes to start from at time of award...
NIH allows you to send a cover letter on your proposal that indicates what study section or institute that you would like your proposal to go to. You can even disclose who has a conflict with reviewing your proposal.

Take them up on it!
PHS 398 Cover Page Supplement – Pages 1 & 2

Cover Page Supplement

Most is prepopulated

2. If you have Human Subjects, be sure to check directions for definitions of Clinical Trial and Phase III

4. Human Embryonic Cells – Cell Lines name must be valid or your submission will error
PHS 398 Research Plan

Research Plan

• Reminder: Watch page limits in the instructions

• Most of page does not need to be uploaded until Finalized and ready for submission

• Grants Office Top 10 Issues had some pointers
  http://www.med.umich.edu/medschool/grants/top10
Research Plan

- Multiple PD/PI Leadership Plan
  - Must have for administrative review
  - Understand the relationship of parties
  - Tie back to the Key Personnel Sections
  - Address what happens in case of issues

  See Training Class Web page for a helpful document

Research Plan

- Consortium / Contractual Arrangements
  - Include institutional sign off
  - Make sure they address FCOI issues
  - Dollars in these documents should match the dollars in your budget
Research Plan

- Letters of Support
  - Looking for institutional commitments (i.e. Cost Sharing)
  - Need to know exactly who backs what commitment

PHS 398 Checklist – Pages 1 & 2
PHS 398 Checklist

- Pay particular attention to
  - 3. Inventions & Patents on Renewals
    - Often missed
  - 4. Program Income
    - Infrequent – Revenue as part of an activity under the proposal
  - 5. Disclosure Permission Statement
    - Also often missed
    - Allows NIH to share information about the proposal if someone wants to contact you

Finishing Touches
Thank You

Your Presenters:
- Heather Offhaus, Director
- Jane Sierra, Manager, Grant Review
- Amy Brooks, Grant Review
- Claire Whittaker-Smith, Grant Review
- Tracey Naylor, Training & Policy

*Special thanks to Tracey for production and Mike Yiu for data!*
University Process of Routing the PAF

What is a PAF?
- Proposal Approval Form
- Summary of everything we requested from (and promised to) the sponsor
- All information for the PAF should come directly from the proposal
- Signatures representing that every unit involved agrees

Now electronic ePAF
http://www.research.umich.edu/proposals/forms/forms.html#PAF
Routing the PAF continued

Required Signatures from the following:

- Project Director
- Financial & scientific responsibility (page 3)
- Conflict of Interest (page 2)
- Department of Project Director
- Space/Facility Use

Routing the PAF continued

When you need more:
- Department & Dean of Participating Investigators
- Fax copies are acceptable
- Approach multiple areas at once
- Have to have for most departments/required for Medical School Dean review
- Units providing cost sharing
- Anything listed in proposal: details
- Mandatory CS is listed on PAF, page 3
ROUTING THE PAF continued

DEADLINES

Departments require at different times

Medical School Dean's Office
  Requests 7 working days before
  should meet sponsor and DRDA deadlines
  Works on in the order received
  Calls as soon as possible

DEADLINES continued

DRDA has a 5 day requested timeline
DRDA has a 2 day Service Policy
Arrive 2 full working days before Fed Ex with the Administrative Shell and 1 day prior with the completed science, FULL SERVICE
Less than above, LIMITED SERVICE

Even if DRDA cannot mail for you, they should give you a mailing label!
ROUTING THE PAF continued

DEADLINES continued

" NIH deadline is in the Application Receipt, Award and Review Cycle Chart
  " Varies by proposal type
  " Watch definition of Receipt Date

ROUTING THE PAF continued

When is the drop dead time?

" On the one hand it doesn’t exist
  " Never stop research
  " Intended to support the research

" On the other....
  " Administrative shell and assurances are there to make sure that the research can happen