The Grant Services & Analysis Office (GS&A) provides a Streamlined Review Service for most proposals. For Clinical Trial Support Unit (CTSU) agreements, we complete a full budget review. Our office focuses on ensuring compliance with School, University and Sponsor guidelines with a timely turnaround time. See Streamlined Review Services for additional information.

We hope that this guide will answer many of the questions you may have when putting together and/or reviewing proposals for approval.

Questions & comments are welcome. Please email to the Grant Services & Analysis Office (msgrants@umich.edu)
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PROPOSAL APPROVAL FORM (PAF) WORKSHEET

1.1 Project Title

- Internal title – this field is for internal purposes. It does not have to match project title.
- For Clinical Trials, see Clinical Trial Support Unit (CTSU) Proposals
- For Recharge proposals, “RECHARGE” in all caps should precede the PAF Project Title field

1.1.2 PAF Long Title

- The PAF Long Title must match the Proposal Title or Agreement Title exactly.
- For Clinical Trial proposals, see Clinical Trial Support Unit (CTSU) Proposals

1.2 Purpose of PAF

https://orsp.umich.edu/route-submit-proposal/deadline-policy/how-answer-eresearch-paf-question-12-purpose-routing-paf

[Diagram showing decision tree for determining whether to submit a proposal or contract/funding agreement based on sponsor readiness and routing considerations.]
1.4 Pre-Proposal

When to use a PRE vs PAF

A pre-proposal needs to be routed if the Institution must **sign** or **submit** the pre-proposal.

See also ORSP's policy on PREs at [orsp.umich.edu/sop](http://orsp.umich.edu/sop).

Pre-proposals **only route to ORSP** if PAF Question 1.4.1 “Is ORSP required to sign this pre-proposal?” is answered YES.

If ORSP is **not required** to sign or submit the pre-proposal, it doesn’t need to be routed on a PRE unless the unit would like the Med School to review.

- **Caveats:**
  - If the pre-proposal is a Limited Submission, units **must** work with UMOR or Medical School Office of Research (see Limited Submissions) for appropriate endorsement/clearance prior to submission.
  - If categorical budgets and/or if any resource or effort commitments are represented, the information **MUST** follow standard Med School/UM policy of representation. Regardless of how information has been represented (e.g., use of DHHS salary cap, incorrect IDC rate or calculation), the **full proposal will be required to include the appropriate information and no exceptions will be made on the final / official proposal based on pre-proposal information**.

1.5 AWD Number

- This field must be completed if PAF is related to a previously awarded project.
- For NIH proposals, if the SF424 application type is Renewal (Competitive Renewal), the AWD number must be entered in section 1.5.
- For NIH resubmissions, see [Resubmissions](#).

1.6 Funding Opportunity Announcement

Verify the correct FOA number and Competition ID are used (i.e., FORM SET F).

1.7 Sponsors

**Direct:** Institution issuing funds directly to U-M. This is a required field.

- For Clinical Trial agreements, see [Clinical Trial Support Unit (CTSU) Proposals](#).

**Prime:** Where the funds originate from. If there is a **Prime Sponsor**, this field must be completed.

**Co-Direct Sponsor:** If a grant is jointly funded.

See [ITS Help Examples](#).

1.7.1 Sponsor Guidelines

- A PDF of guidelines must be attached to PAF as they can change from year to year except for NIH general funding opportunity announcements (there may be specific institute language that is be required to be uploaded). If an award is made, ORSP needs to be able to see what the guidelines/terms were at time of submission.
- When reviewing guidelines, check application form pages; FAQs; sponsor bylaws/grant award rules available on sponsor’s website. Upload to the PAF is applicable.
- Check the sponsor’s required eligibility / limited submission. See [Limited Submissions](#) section for information on limited submissions. *(It is the department’s responsibility to check for PI eligibility.)*
Direct Sponsor Instructions
When U-M is a subcontract, if instructions are not standard/clear, communication from the sponsor with their list of required items and due date (if documents are to be sent prior to Prime Sponsor deadline) should be uploaded. Such documentation will serve as the direct sponsor guidelines. Not required if overall guidelines are standard/clear.

1.7.2 Sponsor Guideline URL
- This field is optional. A PDF of the guidelines need to be uploaded in section 1.7.1 in case the URL changes or is inactivated.

1.7.3 Sponsor Contact Information
- Submissions to Grants.gov, Other Online System: Contact information optional per Help section in eRPM.
- For all other submissions, this is a required field.

1.7.4 Solicitation Number
- ORSP requests this field be completed when the application is in response to an opportunity with a solicitation number to make sure that the appropriate policies are used (i.e., NSF, NIH subcontract, DoD, etc.)
1.8 Proposal Type / Class Code

Definitions and Examples

Class code definitions. The ORSP website has some examples for each category

- **RESEARCH**
  - **Organized Research – 22000**
    - If there is *scientific merit* to the proposed activities, it would likely fall under Research.
    - Some key terms that define research: Explore, Observe, Study, Develop, Investigate, Examine, Create, Draw Conclusion
  - **Off Campus Organized Research -22100** (See ORSPs FAQs)
    - Effort of U-M Personnel working off campus is *greater than* effort on-campus. This includes cost-shared effort.
    - If the above is not definitive apply the following - Total direct costs incurred off campus are more than those incurred on-campus.
      - *The off-campus rate doesn’t apply to those who work remotely from home. Personnel working from home use University resources.*
    - U-M’s Federally Negotiated Indirect Cost Rate for Off Campus Research is 26%.
    - The PAF Class Code field needs to reflect the Activity (i.e., Instruction, Other Sponsored Activities) not where the work takes place. For instance, if the project is not Research (On Campus or Off Campus Research) and falls under OSA, the class code needs to reflect OSA-31000. If the project recovers our Federally Negotiated Indirect Cost Rate, use an IDC rate of 26% and a statement to the PAF Budget Comments explaining this is an Off Campus project.

- **Other Sponsored Research (OSA) – 31000**
  EXAMPLES:
  - Archive, Library and Registries (*exceptions apply* - See Clinical Trial Site Activity below)
  - Biorepositories
  - Consulting
  - Clinical Coordinating Centers (when UM is *not* the lead site) are considered OSA. For example, administering the work to get the sites up and running when a project needs to be able to recruit many subjects)
  - Development of a physician referral tool and training through community outreach events fall within the scope of OSA.
  - Journal editor roles
  - Established service / standard process (i.e., running a test and returning results to sponsor)
  - MDHHS proposals are often OSA since they typically provide a public service.

- **Clinical Trial Site Activity (CTSA) – 31200**
  - UM is a *participating site* on a multi-site study on a protocol held by the external sponsor.
  - U-M work involves collection of data on a study cohort and *returns the results to the lead site*.
  - Majority of work is following the protocol and returning the results to the lead site.
  - It is not unusual for participant sites to have a certain level of analysis, dissemination, and involvement in manuscript preparation.
  - Per the Class Codes and Definitions for Sponsored Awards
    - 31200 Clinical Trial Site Activity *excludes* projects where U-M serves in a lead role; for example: managing / overseeing the collection of data from other sites or having the responsibility to direct (independently) the U-M statement of work.
  - Registries may be classed as CTSA under certain circumstances.

- **Instructional – 11000**
EXAMPLES:
- AP Fellowships – training for clinical experience
- Curriculum development

- Research Training Grants – 16000
  - If the intent is to support the salary/stipend of a trainee (typically a postdoc or predoc), provide a training opportunity and there is a mentor/mentee relationship, it falls under Research Training Grants – 16000.
  - If the intent to fund a research project (funds used for supplies, etc.), it falls under Research -22000.

1.9 Project Abstract / Statement of Work
- This is a REQUIRED Medical School field.
- For Clinical Trial projects, see Clinical Trial Support Unit (CTSU) Proposals
- The Statement of Work / PAF abstract needs to reflect the work that U-M will be doing. When U-M is a subcontract, the overall parent abstract can be included as long it also specifies U-M’s involvement in the project.

2.0 People
- If PI effort is not stated and funds aren’t recovered for salary, a UM Other Commitment needs to be reflected on the PAF to indicate how measurable effort for the PI will be covered (Departmental Research Time or other appropriate source). Principal Investigators have inherent time for project oversight per SOP 500.01 and ORSP’s definition of PI.
- Similarly, if an investigator is doing work that takes time (mentoring not included) and effort is not specified, a UM Other Commitment is needed to show how their time on the project will be covered.
  - Typically, Faculty are required to have some time for administrative work, grant writing, attend faculty meetings, etc.
  - Faculty Appointment Titles
    - Research Scientist Faculty appointments can have the following titles: Research Scientist, Associate Research Scientist, Assistant Research Scientist, and Research Investigator
    - Clinical Faculty members can have the following titles: Clinical Professor, Clinical Associate Professor, Clinical Assistant Professor, or Clinical Instructor.
    - Tenure and Tenure Track Faculty can have the following titles: Professor, Associate Professor, Assistant Professor, and Instructor.

2.1 Students
- If students are involved in the project (paid or unpaid), this question needs to reflect YES.
  - The university needs to ensure we don’t agree to publication restrictions, as publishing is a crucial part of their career development.
  - See GSRAs

2.2 Excluding subcontract personnel, are there other personnel not affiliated with UM?
- This field is Optional. The Medical School does not require this section be completed.

2.3 UM Investigators

Eligible PAF Holders
Anyone that has an Independent Faculty Appointment as dictated in the Standard Practice Guide is eligible to hold a PAF (PAF Role – UM Principal Investigator). See Faculty Appointment Titles.
The Medical School will allow certain Faculty with ineligible job code (i.e., clinical lecturer) to hold the PAF as UM PI if the department deems the person independent. A note needs to be included in the Ineligible Job Code comment that indicates that the department considers Dr. X to be an independent investigator. Per the Med School policy, he/she is eligible to hold the PAF. In August 2021, Clinical Lecturers are phasing into Clinical Instructors and will be eligible PAF holders.

2.5 Non-UM Investigators
- Personnel not affiliated with UM who are NOT included in a subcontract. This field is OPTIONAL

2.7 Project Administrative Home
- The Administrative Home should typically match the U-M PI’s Department. The PI must be in the Admin Home department because they have overall responsibility for the project, and report to the Department Chair. There are a couple of exceptions (i.e., if the project is administrated through a Center where the PI does not have an appointment.)
  - When the applicant (UM Sponsor PI) is in a different unit than the UM PI (Mentor), options are (1) run the PAF through the primary unit of the mentor, or (2) select a UM PI in the same unit as the applicant.

Future Appointments
- If a Faculty Offer is PENDING, someone else within the department will need to hold the PAF until the appointment has been finalized, and then the PAF holder can be updated.

Howard Hughes Medical Investigator (HHMI)
The status map at the top of the PAF will indicate whether an HHMI investigator is included in the personnel section.

HHMI Investigator’s salary is paid by a HHMI (a third-party entity) not U-M. If an HHMI investigator is included and is devoting time (quantified or inherent) to the project, the following commitment needs to be captured on the PAF under “Non-UM Cost Sharing and Other Commitments”.

Example:

Details of Non-UM Cost Sharing and Other Commitments:

<table>
<thead>
<tr>
<th>Item Description</th>
<th>External Entity</th>
<th>Quantified Total Project Amount</th>
<th>Initial Period Amount</th>
<th>External Entity Approvals Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dr. X's Salary and fringe will be paid for by the Howard Hughes Medical Institute</td>
<td>Howard Hughes Medical Institute</td>
<td>$0.01</td>
<td>$0.01</td>
<td>no</td>
</tr>
</tbody>
</table>

PAF UM Roles
UM Principal Investigator (PI, MPI), UM Sponsor Principal Investigator (see Eligible PAF Holders), Participating Investigator With Specified Effort, Participating Investigator Without Specified Effort, Other Non-Faculty Investigator).

Verify that the correct UM PAF role was selected.

9/7/2021
For NSF proposals, see NSF Co-PIs

UM Personnel to list on PAF
Due to Foreign Influence, the rules on whom needs to be listed on the PAF are the same for all sponsors regardless of whether they follow FCOI or not.

- PI(s)
- Sponsor PI
- All Faculty with effort.
- All Mentors, if listed in the application form pages. If only a letter of support is provided and the mentor is not listed on the application form, they do not need to be on the PAF.
- ANYONE listed under Key Personnel must be on the PAF. For example, individuals that are included in the Sr/Key Person profile in grants.gov (regardless of their role), need to be on the PAF.
- Individuals named “Investigator” in the application.

2.11 Personnel Detail
- Reflecting effort on the PAF is NOT a Med School requirement. (Departments may have requirements.)
- If effort is on the PAF and represented to the sponsor, effort needs to match in all places.
- If effort is NOT represented to the sponsor, effort can be listed on PAF if listed in an internal budget (doesn’t need to be uploaded to PAF)
- If there is no representation of effort to the sponsor and an internal budget wasn’t created, effort may be listed as an Internal as an Internal UM Commitments.

Partial Appointments
If effort is reflected on the PAF, the Medical School expects to see % of UM Appointment. If % of Total Professional Effort is listed, a clarifier needs to be added to the effort comment section.

Options for listing effort on PAF for partial appointments. See EXAMPLE
- If % of UM appointment is listed, the Med School DOES NOT require a clarifier.
- If % of Total Professional Effort (TPE) is listed, the comment section needs to indicate that the effort is of TPE. For example, “TPE”, “X% of U-M appointment”, or “X CM” are all acceptable.

PROPOSAL
- When effort is represented as a percentage, our office expects the % indicated to reflect the % of university appointment being devoted to the project. Percent of Total Professional Effort (TPE) can be represented (except for GSRAs*) as long as it’s clearly explained.
  *A GSRA who is committing 6 calendar months would be listed as 100% effort. GSRA’s have an FTE of 0.5, which is equivalent to 100% of their university effort.

  See MDHHS Effort Representation.

Calculating % of UM Appointment
1) % Total Professional Effort (TPE) divided by UM FTE = % of UM Appointment

    Or

2) UM FTE * 12 = Calendar months that person has available to give.
Divide the CM committed by the CM available to get the % of UM Effort

EXAMPLE
Dr. Zodiak is devoting 1.2 CM = 10% TPE (1.2 CM / 12 months); Dr. Z’s UM FTE: 0.85

Calculate % of UM Appointment:
Option 1: 0.10 (% TPE) divided by 0.85 (UM FTE) = 11.76%
Option 2: 0.85 FTE * 12 months = 10.2 calendar months
1.2 CM / 10.2 CM = 11.76%

Options for reflecting effort on PAF for this example:

![Proposal and Expenditure Form](image)

Hours
If hours (in place of effort / person months) are reflected in the application, the following statement needs to be added to the Budget or Budget Justification.

NEW LANGUAGE: Effort has been listed in hours at the request of the sponsor. The work week for each individual may vary, and the University will track time based on percent of effort.

NOTE: If hours are required but effort and/or person months are listed somewhere in the application, this statement is NOT required.

3. Budget
Budget and Time Period

Budget Guidance
– See [Budgets](#)

Project Period
• The PAF project period should be for the years of expected funding. For instance, if U-M is a subcontract and isn’t participating in all years of the project, the PAF (and subrecipient letter of intent) should only reflect the dates that U-M will be involved.
• If there isn’t a definitive Budget Period to or from the sponsor, project periods and costs can be represented as prorated or according to phases.
• For proposals to NIH, check the Funding Opportunity Guidelines and [Standard Due Dates](#) for earliest start dates.
• For Grants.gov submissions, the proposed start date needs to be a future date, or it will cause an error upon validation. To avoid G.g errors, the following steps need to be followed.
  o PAF budget section needs to reflect the actual start and end dates.
  o A statement needs to be added to the PAF Budget Comment section explaining that the application reflects a future date to avoid errors during submission.
  o The project period start date on the G.g application needs to be at least one day out from the date the application will be submitted, otherwise it will error.
  o The Budget Justification should include an explanation.
    ▪ Example: The supplement request dates are 6/1/2019-5/31/2020' however the application reflects a future start date to avoid errors during submission

Indirect Cost (IDC) Rate

• The IDC rate reflected on the PAF’s Proposed Total Project Budget as well as the Proposed Initial Budget Period should be the rate on the first day of the project.
• Make sure that the appropriate IDC rate is reflected and applied.
• Specific programs (e.g., K, F, and T activity codes for NIH proposals) have a mandated published rate (refer to Funding Opportunity Announcement) that is applicable to all applicants.
• Clinical Trial Site Activity (CTSA) – 31200 is a subset of Other Sponsored Activities (OSA). See 1.8 Proposal Type / Class Code. The Indirect Cost Rate for OSA is used for this type of activity.
• Full recovery of indirect costs is expected on all grants/contracts.
• In all cases, the Federal Rate is the maximum rate that can be recovered. This is important to remember in situations when a sponsor allows a higher rate. For example, if submitting an Other Sponsored Activity (OSA) project to a Foundation which allows 40%, the federally negotiated rate for OSA (currently 29%) needs to be used, not 40%.
• For IDC recovery for foundations, see Foundations
• If the standard expected rate is not used, a waiver should be requested prior to routing a PAF. See https://az.research.umich.edu/medschool/policies/indirect-cost-waiver. Requests should be submitted at least one month prior to submission to allow adequate time to review.

Exclusions
For Federally Sponsored Projects and Non-Federally Sponsored Projects that recover the Federal Rate, the University uses a Modified Total Direct Cost (MTDC) base for calculating indirects. Equipment purchases for $5,000 or more with a life expectancy of one year or greater.
• Alterations and renovations of facilities
• Tuition
• Patient care costs (as charged through the Clinical Pricing Tool)
• Subcontracts – the first $25,000 of each subcontract is included in the base for calculating indirect costs, any amount over $25,000 gets excluded from the indirect costs base.
If the sponsor DOES NOT recover the full federal rate (such as foundations), there should not be exclusions from the base unless stated in the sponsor guidelines /instructions.

FOUNDATIONS
The Medical School will accept a Non-Profit’s standard published rate if it is accessible in the terms and conditions, guidelines, and/or entity by-laws. If there is no published rate, it is expected that a minimum rate of 20% will be used.
Note: the IDC rate can exceed 20%; it just cannot exceed the Federal Rate for the work.

Higher Education and Academic Medical Centers are collectively treated as Non-Profit

Notes:

9/7/2021
1. The Medical School does NOT accept emails, phone calls, letters, or other non-published announcements as indication of a lower than standard rate. In special circumstances, when sponsors are silent on the issue, conversations may be started with the Grant Services & Analysis Office on the appropriateness of using an historical rate prior to budgeting.

2. In cases where the sponsor is silent or clarification on a rate is needed, **only the Grant Services & Analysis Office is authorized to engage a sponsor for further information and clarity.**

3. The Indirect Cost Rate is assumed to be a % of Total Costs unless the sponsor specifically refers to the rate as “% of direct costs” (on the instructions, form pages, budget, etc.). e.g., Sponsor lists maximum costs as $300,000 and states “up to 10% may be used for indirect cost recovery”.

**EXAMPLE Forced Indirect Rate to be used when IDC rate is % of Total Costs:**

- Sponsor Allows 10% indirects of Total Costs
- Total project costs = $300,000
- $300,000 * 10% = $30,000 for indirects.
- To calculate the forced IDC rate, divide the indirects by the directs (i.e., $30,000 divided by $270,000 = 11.1111%).

A statement needs to be added to the PAF Budget comment section explaining the rate used. **10% of total costs results in a forced indirect rate of 11.11%. the PAF indirect rate field has to show the forced rate.**

**Standard Exceptions**

**JOURNAL EDITOR ROLES**

- The Medical School agrees to waive indirects on journal editor roles.
- PAF needs to be marked “YES” for IDC waiver and “Medical School waives IDC recovery on journal editor roles” needs to be added to the comment section.

**INVESTIGATOR-INITIATED INTERVENTIONAL CLINICAL STUDIES – INDUSTRY SPONSORED:**

- In the case of an Industry-Sponsored, U-M Investigator-Initiated Interventional Clinical Trial where the protocol is created and held by U-M, the On-Campus Research Class Code (22000) should be used, but a reduced Indirect Cost Recovery Federal OSA Rate (currently 29%) will be accepted.
- PAF needs to be marked “YES” for IDC waiver and “Medical School waives IDC recovery on U-M Investigator-initiated interventional clinical trials” needs to be added to the comment section.

**SBIR/STTR PHASE I PROJECTS:** Medical School waives indirects, no formal waiver is needed.

- PAF needs to be marked “YES” for IDC waiver and “Medical School waives IDC recovery on Phase I STTR/SBIR proposals” needs to be added to the IDC waiver note section of the PAF. **NOTE: a project team may request 0% or 56%, nothing in between. If a Med School proposal, our rate should be used, not another college’s rate.**

When indirects are not requested, the IDC base field in the R&R Budget needs to be completed. The line should read MTDC-→0% indirects→IDC base figure→$0.00

Add a note to the PAF to indicate whether Phase I or Phase II. If the PAF includes both Phase I and Phase II of the project, the Phase II portion needs to recover UM’s full federally negotiated rate.

If Departments choose to recover full indirects on Phase I STTR/SBIR, add the following statement to the PAF Budget Comment section “X Department is intentionally recovering full indirects on this Phase I project”. 

9/7/2021
As a reminder, NSF does not allow cost-share. Be cognizant of language in application regarding waived indirects.

**INDIRECT COST WAIVERS ON FEDERAL PATIENT PASS-THROUGH COSTS**

The Medical School allows use of a waiver for indirects to be recovered on the first $25,000 to each site and then IDC waived for all other Federal Patient Pass-Through Costs, for pass-through expenses related to clinical trial patient payments on federal projects. Medical School units seeking a reduction of indirect costs on pass-through expenses related to these costs meet the following conditions:

- The activity is per patient reimbursement costs to participating sites.
- It is proposed in an application for Federally Sponsored Multi-site applications (this does **NOT** apply to Industry-Sponsored Multi-site projects)
- If Administrative Home Department agrees with the use of a waived rate (indicated by approval of the PAF, no formal waiver request).

When preparing an SF424 Budget for submission to Federal Sponsors, the total amount allocated to the sites for per-patient activity should be shown on a separate line item (these costs **do not need** to be reflected on the “Subawards/Consortium/Contractual Costs”). Formal subcontract paperwork is not required; however, it may be appropriate to include in the proposal a letter of agreement from each site.

PAF needs to be marked “YES” for IDC waiver with a description of the circumstances in the text field: “This proposal includes patient care pass-through costs. The indirect costs on these expenses are included for only the first $25,000 for each of the X sites.”

**IRB Fees**

IRB fees are charged to Industry sponsors (not Foundations or Federal Agencies) for New Projects that involve Human Subjects. See **IRBMED FAQs**.

- The IRB MED Fee for review of new studies with Industry Sponsors is **$3,750** (effective 7/1/2021).
  
  Incremental PAFs for the same study will not incur an IRB fee.

- In cases when IRB MED cedes oversight to an external IRB, the IRB charge is **$1,300** (effective 7/1/2021). PAF section 5.1.3.2) will indicate that the project will use an external IRB as IRB-of Record.

- IRB fees are **excluded** from the IDC base.

**3.1 Budget Components**

Review the Budget Justification, Resources, Letters, and other relevant documents for commitments. When reviewing language, consider whether the commitment is to the PI’s overall lab work/research vs to this specific proposed project.

As PI of the project, he/she has direct oversight of the work. If no effort is requested for the PI, a UM Other Commitment needs to be added to the PAF with a statement indicating that the PI will have protected departmental research time (or other appropriate source) to complete the work.

Commitments made with sponsored funds (such as salary support provided by an existing project) need to be captured in the PAF budget notes section. Include the Grant ID (i.e., T32 number) or Project Grant Number (PGN) as well as the period of coverage.

All commitments that are **specific to the proposal** need to be reflected on the PAF.
UM Cost Sharing

UM cost sharing occurs when the University states in a proposal that it will provide a specific, quantified resource without asking for funding to cover the cost. Examples include: 10% of a faculty member's effort, $5,000 in research supplies, etc.

UM Other Commitments

UM Other Commitments occur when the University states in a proposal that it will provide a resource to the project but does not quantify the item. Examples include unspecified faculty effort beyond what is budgeted and accounted for in the proposal, running samples at no cost and without mentioning value, etc.

Internal UM Agreements

Internal UM Agreements occur when one or more unit(s) of U-M make(s) a commitment to provide a resource if the project is funded, but the arrangement is not referenced in the proposal and has not been shared with the sponsor. Examples include, if not mentioned in the proposal, provision of additional lab space, coverage of fringe benefits that the sponsor will not fund, etc.

Non-UM Cost Sharing and Other Commitments

Non-UM Cost Sharing and Other Commitments occur when a proposal includes contributions from an entity external to U-M (a.k.a., Third Party Commitments). Contributions may be quantified in the proposal or may be unspecified. Examples include: A local community organization’s commitment of volunteer time, a corporation’s donation of a $10,000 piece of equipment, etc.

Indirect Cost Waiver

The budget includes a request for an indirect cost waiver, if your unit allows. (A request to use a rate less than the University-recognized recovery for the sponsor and activity types)

Subproject/Grant Distribution

The unit would like to list projected details of intended subproject/grants with other campus units. (These estimated distribution details are subject to change based on the actual award and subsequent negotiations and are not considered final.)

UM Cost Share

### 3.2 UM Cost Share

<table>
<thead>
<tr>
<th>Line Item</th>
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<th>Total Period</th>
<th>Indirect</th>
<th>Initial Period</th>
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<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
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</tr>
</tbody>
</table>

**UM Cost-Share Fields**

- **Line Item**: Description (e.g., 10% effort for John Doe or equipment)
  - If a specific level of effort is being committed rather than a specific dollar amount, we suggest the description reflect % effort/or CM vs “salary and fringes”. This simplifies post-award when determining whether the cost share requirements have been met. Per Sponsored Programs (SP), if the sponsor isn’t explicit in the agreement about cost-share and % effort is reflected in the cost-share section of the PAF, SP will let either the effort or the dollar amount meet the cost share requirement.
  - Preference would be to list each cost-shared item on separate lines. If aggregate amounts are funded by Department, they can be listed on one line.

- **Indirects**: Must follow the IDC rate of the project. Indirects must be imputed even if they will not hit the cost-share account.

- **Source**: The source field must be completed for each line of cost-sharing reflected on the PAF. This field can either reflect a short-code or type of funds (i.e., general funds) that will be used to cover the cost sharing.

- **Department**: Appropriate Dept ID.

**Cost-Share Approvals**

Departments have various approval processes.

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UM Other Commitments

- See 2.0 People
- Description should not include quantifiers (i.e., % effort or dollar amount).
- Source of funds needs to be included (i.e., departmental funds, etc.)
- If the commitment is with sponsored dollars (such as salary support provided by an existing project) it should be captured in the PAF Budget notes section. Include the Grant ID (i.e., T32 number) or Project Grant Number (PGN) as well as the period of coverage.

Internal UM Commitments

This field is for internal use (when a commitment is made but not referenced in the proposal such as coverage of fringe benefits that the sponsor will not fund, etc.). The Medical School doesn’t’ review this section of the PAF.

Non-UM Cost Sharing and Other Commitments

Non-UM Cost Sharing and Other Commitments occur when a proposal includes contributions from an entity external to U-M (a.k.a., Third Party Commitments). The contributions may be quantified in the proposal or may be unspecified. Examples include - A local community organization’s commitment of volunteer time, a corporation’s donation of a $10,000 piece of equipment, etc.

See Howard Hughes Medical Investigator (HHMI) and VA faculty with effort cost-shared on an NIH proposal

3.13 Budget Comments

- Add notes in this section to clarify the budget or budget calculations, such as exclusions to IDC base for modular applications, sponsor IDC rules, IDC base exclusions for non-federal applications.
- If a U-M personnel’s project effort is concurrent with a sponsored award (i.e., K award), reflect the award number and end date in the Comments field.
- If a conversion rate was used, add notes to indicate the rate used and the date the rate was looked up. If you have a PDF of the rate conversion, upload it to the PAF.
- If sponsor does not require/want a budget, Sponsored Programs need to know how funds will be spent. Notes can be added to this field (categories the funds will be used for such as supplies, salary, travel) or an Internal Budget can be uploaded to the PAF.

3.17 Subcontracts

- A Statement of Collaborative Intent signed by an Authorized Representative at the sub consortium site is required to be uploaded before routing for approval.
  If the Subrecipient does not an have an enforced Conflict of Interest (COI) policy, and UM will manage, a Non-U-M Affiliate Disclosure Form for each investigator needs to be completed, signed and uploaded to this section of the PAF if submission is to a PHS sponsor.
- For DHHS proposals (see DHHS Salary Cap) we expect salary over the cap to be treated consistently throughout the application including subcontract sites.
- For Pre-Applications (see 1.4 Pre-Proposal), if we are representing information for another site, a signed LOI or a provisional sponsored projects office acknowledgement that the PRE is being submitted and they understand that that they are involved is required.

4. Space for UM Investigators

- Space needs to be indicated for all UM Investigators who have specified effort.
- We only require a space comment for departments that are under Med School oversight—for example, Biostatistics may use “Adequate Space” with no comment.
• Specific room numbers do not need to be listed. Many choose to select “Adequate Space”. When choosing the “Adequate Space” option, a comment needs to be added describing the type of space that will be used (i.e., Medical School space, Hospital/Clinic space or Hospital Research Space”’. If a specific building and/or room is indicated, the type of space still needs to be included.

• If space listed belongs to a department not under Admin Home and Admin Home is not listed as an occupying department, the DeptID may not be overridden. Override either needs to be removed so correct department can approve, or if Admin Home department is responsible for providing adequate space, the “adequate space” with a comment can be used.

Clinic/Hospital Space
Space approval from the Clinical Department’s CDA is required for Hospital / Clinic space. Hospital Office space does not require CDA approval.

• Use of the Ad Hoc Approver activity on the PAF

OR

• The CDA’s approval, either by Unit Approval of the PAF or an uploaded email from the CDA. (Email must include PAF #, specific space used, and an indication of approval uploaded under the PAF documents on the PAF).

VA Space

• We DO NOT require space approval for space listed in the PAF under Work Off UM Property. As with any other external entity, we don’t require approval to use space listed under Work Off U-M Property. This includes VA space.

Michigan Clinical Research Unit (MCRU) Space

• If MCRU is the ONLY clinical space, it needs to be reflected on the PAF.
  o MCRU will ONLY USE DEPT ID 231915 (CTSO-Research Innovation (MCRU)).

Core Space

• Core space typically doesn’t need to be listed on the PAF. The space is paid for as part of the recharge rate.
  o Core space should be listed on the PAF is if it is the only space (PAFs to establish recharges for the Core).

5. Research Activity

• Double check the Statement of Work and other documents to verify that these questions have been answered correctly.

• Check the Human Subjects and Vertebrate Animal answers against the application, including Yes/No answers and Approval Date (if applicable).

• Check the biosafety questions against project abstract to ensure consistency.

• If transgenic animals (knock out mice / genetically modified mice) are used, PAF question 5.4.6 use of transgenic animals? needs to be marked YES. (Note, that PAF question 5.4 Does this project involve research in a U-M laboratory with biological materials? needs to be marked YES for 5.4.6 to populate.)

• The PAF answer to "Multi-study sites for human subject research" should correlate with the human subjects’ study record section “Multi-study site” question in the study record section of G.g applications.

• For G.g applications, if PAF 5.4.4) Use in a U-M research laboratory of human-derived substances (including cell/cell lines, blood products, body fluids, tissues, pathology materials, organs, body parts, cadavers)? is marked YES and Human Subjects are NOT involved, the following question must be marked YES and an explanation of why the application does not involve human subjects research must be uploaded.

PHS Human Subjects and Clinical Trials Information

1. If No to Human Subjects:
2. Does the proposed research involve human specimens and/or data?

   NOTE: if only human data is proposed and does not involve human specimens, the PAF question 5.4.4 would be marked NO even though the PHS Human subjects question reflects YES.

NIH-Specific

   NIH Flow Chart for determining whether a project is considered Human Research

Exempt vs. Not regulated

   Helpful sites:

   IRBMED Exempt Human Subjects Research
   IRBMED Frequently Asked Questions (scroll down to “Other Application Types” for information regarding not regulated and exempt studies)

   Exempt Studies ARE considered Human Subjects Research. Exempt studies do not need to be reviewed yearly. (Note, if a study is considered Exempt, not all sections need to be completed within the PHS Human Subjects and Clinical Trials Information section of the application. The “Protection of Human Subjects” document needs to state why the project meets the exemption criteria.)

   Not Regulated projects ARE NOT considered Human Subjects Research. If the work is covered by a not-regulated IRB, it isn’t considered human research. If the only IRB applicable to the project is not-regulated, the application and /or subrecipient form should reflect NO to Human Subject Research. (Not-regulated projects don’t need to be reflected on the PAF. It’s okay if they are.)
Data and/or Biospecimens Policy

When Individual-Level Patient/Participant Data or Biospecimens will be sent to a sponsor and falls In Scope (see Out of Scope and In Scope below), the transfer is subject to review and approval by the Medical School Human Data & Biospecimen Release Committee and the Dean of the Medical School. Approval is required prior to requesting that ORSP negotiate an agreement. This policy was brought about because of inconsistent data sharing practices. This policy ensures research participants are informed with whom their data/biospecimens will be shared with and who may benefit financially.


Out of Scope (the following do not need to be reviewed by the DOCTR office):
- Patient Care
- Aggregated, summary level data
- Governmental and Academic Entities
- Clinical Trials that adhere to NIH's definition of a Clinical Trial
  If ALL of the following four answered YES the study is considered an NIH Clinical Trial
  - Does the study involve human participants?
  - Are the participants prospectively assigned to an intervention?
  - Is the study designed to evaluate the effect of the intervention on the participants?
  - Is the effect being evaluated a health-related biomedical or behavioral outcome?

NIH Definition of Clinical Trial Case Studies and NIH FAQ page can help determine whether the study is considered an NIH-defined clinical trial.

For example, interventions don’t need to be randomized and include a comparison group to be considered an NIH-defined clinical trial.

In Scope (the following need to be reviewed by the DOCTR office):
- Human data & biospecimens – individual level, even if de-identified (unless it’s a trial that falls under NIH’s definition of a clinical trial – see above)
- Transfers to for profit or commercial entity
- Industry, Foundations Professional Society (Foundations that use third parties (industry partners (i.e., AHA))

A $5,000 data transfer fee applies. The $5,000 fee is inclusive of indirects. It needs to be split between directs and indirects at the appropriate rate being used for the proposed type of activity. For example, if the activity is OSA (29%), the split would be $3,876 directs / $1,124 indirects (Calculation: $5,000 / 1.29 = directs)

The DOCTR office can assist with determining study details including what data are to be sent and whether industry is involved.

Contact: Med School Human Data & Biospecimen Release Committee (DOCTR) Oor-DataRelease-All@med.umich.edu

5.11 Non-financial agreements in place related to proposal
- If this question is marked YES, a UFA or SSP number needs to be included.

6. Submission Information
6.1.1 Submission Deadline

- Last date proposal can be submitted to meet the sponsor’s deadline
  - See Prime Sponsor Deadline below if there is a prime sponsor.
- ORSP will use the Submission Deadline date to determine Service Level Standard (Full Review; Limited; At Risk)
- If submitting to NIH, the submission deadline should reflect the last day of the receipt period. See NIH Standard Due Dates, if standard dates apply. Otherwise, check the announcement for due date information.
- If submitting to NIH using Continuous Submission Eligibility, see Continuous Submission.
- The Submission Deadline must reflect a Business Day. If the deadline falls on a weekend, review the sponsor’s policy to determine whether the deadline rolls to the next business day (NIH does). If not, the deadline needs to reflect the last business day that ORSP needs to approve the PAF to meet the sponsor deadline.
- Submission Deadlines need to reflect a documented date requested by the sponsor. If the date was received via email, instead of from a published document, the email needs to be uploaded to the PAF.

6.1.2 Early Submission Time

- If the sponsor requires the proposal be submitted earlier than 5 p.m. EST on the due date, the PAF needs to reflect YES to Early Submission Time. The PAF only allows early deadlines to be on the hour. If the early deadline utilizes another time always round down (Example: 3:30 pm deadline would round down to 3 pm).

6.1.3 Target Date

- Date ORSP is requested to complete work. See ORSP Response Time Goals.
- Used alone or in combination with Submission Deadline
  - If there is a Submission Date AND a Target Date, the School Deadline is based on the Submission Deadline.
- ORSP will try to meet Target Date, but no guarantees.
- If a Target Date is listed with no Submission Deadline date, the School Deadline needs to be calculated using the target date.
- Contracts do not have the option to utilize a Submission Deadline in the PAF. The Target Deadline for these may be a hard submission deadline on occasion.

6.1.4 Prime Sponsor Deadline

- The Prime Sponsor Deadline must be completed if a Prime Sponsor is involved, and the Prime Sponsor has a deadline. Sometimes a PAF will be routed after the Prime Sponsor has awarded to the Direct Sponsor. On those occasions, there may not be a prime sponsor deadline.
- The Submission Deadline date must be the same as the Prime Sponsor Deadline date UNLESS
  - There is written documentation from the Direct Sponsor uploaded to the PAF stating that the institution needs to receive UM’s paperwork by a specific date.
  - If there is no written documentation from the Direct Sponsor, the Target Date field can be used.
- Example: Direct Sponsor is asking UM to participate on their February 5th NIH proposal.
  - If there is no written documentation from the direct sponsor of their internal deadline, the Prime Sponsor Deadline will be 2/5 & Submission Deadline will be 2/5. A Target Date with an early deadline can be used.
  - If there is written documentation then the Prime Sponsor Deadline will be 2/5, and the Submission Deadline will be the internal deadline date of the direct sponsor.

6.1.5 School Deadline

- The GS&A office requests the Admin Shell arrive in our office 10 business days (when counting, include the due date in your calculation) prior to the sponsor’s deadline. School Deadline Calculator.
- The School Deadline field is required for Medical School proposals with a Submission or Target deadline.
- The School Deadline is to be based on the Submission Deadline.

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• If there is a Submission Deadline AND a Target Deadline, the School Deadline is to be based on the Submission Deadline.
• If there is only a Target Deadline, the School Deadline is to be based on that deadline.

6.2 Submission methods

6.2.2 Proposal Submission Methods
• Check to ensure that the appropriate submission method is selected.

6.2.3 Routing Instructions
• If documents need to be signed and/or provided by ORSP, add notes in this section indicating what you need ORSP to do.
• For contact/funding agreements, if an agreement is not attached, indicate whether ORSP should provide an agreement. Include any requested contract terms (i.e., fixed price or cost-reimbursable; whether the sponsor has already agreed to fund this project; whether publication is anticipated and whether it’s likely that IP will be developed.)

6.3 Final Documents for Submission
• If PAF is finalized at time of review, all documents to be submitted to sponsor need to be uploaded in this section.
• If final documents require PI and ORSP signature, ORSP expects the PI to sign prior to finalization.
• For Clinical Trials, see Clinical Trial Support Unit (CTSU) Proposals.

6.4 Supporting Documents
• This section is for internal documents that will not be sent to the sponsor.
• If you are routing a contract to be negotiated, attach an EDITABLE version (e.g., a Word document) of the contract and supporting documents to this section.
• Make sure that all Medical School Administrative Shell documents are attached to the PAF and/or included in the application.
  o If documents are uploaded in multiple places (PAF and application), all versions need to match.

CTSU Agreements
There are instances when it is necessary to keep prior versions uploaded to the PAF (for instance, for CTSU proposals, prior versions of the agreement).

Instructions on how to upload a new version of a document and keep a version history (keeps previous documents): https://documentation.its.umich.edu/node/1290
OTHER

Budgets

- See “Budgeting & Costs” on our website.
- If the sponsor does not require a budget, it needs to be indicated on the PAF how the funds will be spent. It can be as simple as categories the funds will be used for listed in the PAF budget comments section (supplies, salary, travel, etc.) or an Internal Budget can be uploaded to the PAF. For Clinical Trial proposals, see Clinical Trials.
- Budgets should be in Sponsor Format (i.e., R&R Budget Forms for NIH submissions unless a modular budget), in most instances, so that we can review what will be submitted to the sponsor.
- Internal budgets aren’t typically reviewed by the GS&A office, but there may be circumstances when we need to refer to the internal budget. If an internal budget is the only budget, it may need to be looked at to see how costs will be spent (i.e., if PI will devote measurable effort. See UM Other Commitments.
- The GS&A Office performs a Streamlined Budget Review of most proposals. (A full budget review is completed for Clinical Trial Support Unit (CTSU) agreements). Effort levels, investigator salary calculations, F&A calculations and justification language are reviewed as well as budget categories of special interest (i.e., equipment, sponsor restrictions). See Uniform Guidance.
- Loss or profit cannot be represented. If an Internal Budget represents a LOSS or PROFIT, it needs to either be removed or updated to show only the costs from the sponsor.

Salary

- We expect to see consistent application of Salary Cap. See DHHS Salary Cap email.
- Salary cannot be averaged over the project period resulting in over inflation in year 1 (i.e., you cannot increase salary for each year and then average the salary over a 5-year period). We do not allow this budgeting practice since it removes the option for NIH to address each line item. We would be providing a false rate that can’t back up if audited. A reasonably expected base salary needs to be used for the start of the project.
- If sponsors do not require use of salary cap, actual salaries must be used OR the difference must be cost-shared.

DHHS Salary Cap

Email from Jane/Heather/Beth dated 1/15/2021:

Pre-Award implementation:
Considerations:

- If you are submitting a modular proposal, you are expected to use the salary cap when building your internal budget.
- If the sponsor has a mandated direct or total cost limit on your request, where using the actual salary would penalize your ultimate award, we recommend using the cap. Please consult your department for further instruction.

This is a review of the three acceptable ways to treat individuals that are compensated over the cap (you must use only one approach within a proposal!):

- Ask for actual! Let the sponsor reduce you at time of award. This is the Medical School preferred when there is not an application limit!
- Start at the current cap and increase in future years... (NIH has said their fiscal policy is to not give increases, but maybe they will change some day – and if you didn’t ask for it, they will not apply it).
- Start at the current cap and hold everyone at the cap each year. Be careful in out-years to also limit people that cross the cap. This is the approach suggested only when there is an application limit on your budget request.

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If you choose to use the 2nd or 3rd options:

- We encourage you to use the new cap in proposals beginning now ($199,300) but realize that many proposal budgets have already been created and are routing for approvals.
- At this time, if the administrative home department has approved the budget at the old cap, we won’t require until Feb 8. If you have something already routing that you would like to change, please call us and work out a plan.

If you participate as a subcontract, the other institution may not be prepared for your rebudget. Please chat with them and include clear information (an email?) on your PAF to let us know if they are prohibiting you from using the new cap.

**Remember:** You may not take the current salary cap and increase for the first-year budget. You must either start with the current cap or actual. And the school requires ALL personnel within the proposal at/above the cap to use the same capped dollar amount. You may NOT put some participants at the old cap, some at the new, and some at actual. It must be consistent within the proposal. Plan ahead – especially for multi-unit proposals.

And last budgeting note – the salary cap is the maximum that can be recovered for a full 12-month period. If you are working with someone with a 9/2.5 appointment, the cap over the 9 months is $149,475 and over the 2.5 months is $49,825. (In other words, they do not reach a total $199,300 since they do not have a full 12-month appointment.)

**Partial Appointments**

- Many sponsors (including NIH) request University Compensation Rate be listed. For individuals with a partial appointment, University Compensation Rate (the annual compensation paid by the employer) is not equal to their Full Rate (FTR).
  - See NIH
- The Department of Defense requires that the Full-Time Equivalent Base Salary (the amount the individual would be paid if they were employed full-time) to be reflected in the base salary field. See DoD
- See U-Year faculty

- **Some sponsors calculate in terms of a percentage.** Whether the individual has a full 1.0 FTE or a partial appointment (for example, 0.8 FTE) all employees of UM have 100% of their appointment to allocate. Budgets should be built on the University Compensation Rate and the % of time (out of 100%) is applied to calculate the reasonable amount to charge the sponsor.
  - For example, if someone with a 0.8 FTE is devoting 9.6 CM to a project, they are devoting 100% of their appointment to the project. (0.8 * 12 = 9.6 CM)

**Calculating salary for Partial FTEs**

Dr. University
- FTE: 0.75
- University Compensation Rate: $166,686
- Full Time Rate: $222,248

Dr. U is devoting 1.8 CM to the project.
Percent of University Appt: 20% (Calculation: % TPE / FTE = 0.15 / 0.75)
- Calculation using % University Appt: 166,686 * 20% = $33,337

**NOTES:** For individuals with VA appointments, the UM and VA base salaries aren’t always the same. The UM Compensation Rate needs to be used when determining whether the individual is at/over cap (DHHS Cap * FTE).
VA Appointments
See Veteran Association (VA) Appointments

U Year Faculty
For those with U-Year appointments: U Year faculty are required to have two weeks in the summer that are not funded by sponsored dollars. Summer salary for faculty with AY appointments, can be calculated at 1/9 of their institutional salary for each month of summer effort, up to 2.5 months for the entire summer. When these individuals are at the NIH cap and if cap is applied, the max base salary that can be listed is 11.5/12 * Current Cap. For NIH applications, the base salary field is not a required field and can be left blank.

DETERMINE IF U YEAR FACULTY ARE AT OR ABOVE DHHS SALARY CAP
U Year Faculty’s salary that is listed in the system is for 9 months out of the year. To determine if NIH cap applies, you will need to convert their salary to a 12-month salary or convert the NIH cap to a 9-month salary.

To convert their salary to a 12-month salary:
Faculty Member 1: $180,000/9-months x 12 months = $240,000 (Yes, they are over the NIH Cap)
Faculty Member 2: $140,000/9-months x 12 months = $186,666.67 (No they are not over the NIH Cap)

To convert the NIH cap to a 9-month salary the calculation would be reversed:
Current NIH Cap = ($199,300 / 12 months) x 9 months = $149,475. Based on this only the first faculty member is over the NIH cap.

If you are including summer effort for U Year faculty over the cap, you can only include the maximum amount of summer salary per month. This would be determined by taking the $149,475 / 9 to figure out how much 1 summer (ninth) would be allowable on the NIH grant. In this instance, that would be $16,608.33.

CALCULATE REQUESTED SALARY FOR U YEAR FACULTY
EXAMPLE:
Faculty Member 1: 9-month salary =$185,000,
Proposed effort:
  0.6 Acad months (UM effort = 0.6 / 9 months = 6.6666%),
  0.6 Sum months (UM effort =-0.6 / 2.5 months = 24%)

Option 1: Multiply Monthly Salary by Person Months
Monthly salary: 185,000 / 9 months = $20,556
  0.6 Acad * $20,566 = $12,333
  0.6 Sum* $20,566 = $12,333
Total requested salary: $24,667

Option 2: Multiple % UM effort by Base Salary
  Acad Months: $185,000 (9-month base salary) * 6.6666% = $12,333
  Sum months: $51,389 (2.5-month base salary*) * 24% = $12,333.

* To calculate summer base, multiply monthly salary (20,556) by summer months (typically 2.5 Sum months)

Clinical Trial Support Unit (CTSU) Proposals
The Clinical Trial Supports Office supports Clinical Research that has a billing calendar and is an NIH-defined Clinical Trial. Project teams can submit an Intake form here.
Clinical Trial Site Activity—Someone else’s protocol, U-M is seeing the subjects and returning the data to the sponsor. Not doing interpretation of results beyond that of what other sites are doing. See 1.8 Proposal Type / Class Code

PAF Abstract/Statement of Work must reflect what the study is about and should identify that UM is a site.

Revenue Budget—A feasibility budget showing profit/loss CANNOT be uploaded to the PAF.

If there is a Master Agreement, it may need to be listed in the UFA section of the PAF.

If sponsor budgets or agreements don’t identify a specific number of subjects, the study team will estimate the number of subjects they anticipate recruiting.

The following language CANNOT be included in agreements since it creates a Medicare Secondary Payer Issue. “Study costs considered Standard of Care (SOC) but not covered by a Study Subject’s insurance will be reimbursed upon submission of invoice”, Contact the CRAO office if you have questions.

If the Contract Research Organization (CRO) is a party to the contract, they would be the direct sponsor on the PAF.

NOTE: If the CRO is signing on behalf of the prime sponsor or is the signatory authority for the prime sponsor, the CRO would not be a direct sponsor on the PAF.

The Protocol should be included in PAF section 6.3 Final Documents for Submission since this document serves as the proposal.

PAF Budget Proration
The first year of the budget needs to be prorated based on the number of years in the project; startups can be incorporated into the initial budget year.

Budgets need to be prorated in Full Years.

- If the last budget period is > 6 months, round up. If the budget period is < 6 months, round down. If = 6 months, round up OR down.
  - Examples:
    - For a 27-month (2 years, 3 month) budget period, prorate by 2 budget periods.
    - For a 34-month (2 years, 10 month) budget period, prorate by 3 budget periods.
    - For an 18-month (1 years, 6 months) budget period you can choose to round down to prorate for 1 or 2 years.

Example if Start Ups are included in the PAF Initial Budget Period

<table>
<thead>
<tr>
<th>Total Cost</th>
<th>$528,574.00</th>
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<tbody>
<tr>
<td>IRB Fee</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Startup Costs</td>
<td>$12,500.00</td>
</tr>
<tr>
<td>Number of years</td>
<td>8</td>
</tr>
<tr>
<td>IDC rate</td>
<td>0.29</td>
</tr>
</tbody>
</table>

Total Budget

| Direct | $410,309 |
| Indirect | $118,265 |
| Total  | $528,574 |

Initial Budget Period

| Direct | $61,955 |
| Indirect | $17,242 |

1. Total costs minus the IRB Fee ($2,500 for full-IRB; $1,000 if external IRB)
   - $528,574 (Total Costs) - $2,500 (IRB Fee) - $12,500 (Startup Costs) = $513,574

2. Divide by the number of years.
   - $513,574 / 8 (# of years) = $64,197

3. Add Startup costs for year 1
   - $64,197 + $12,500 = $76,697

4. Divide by 1.29; add the IRB fee for the Year 1 Direct Costs
   - $76,697 / 1.29 = $59,455 + $2,500 (IRB fee) = $61,955 (Year 1 Direct Costs)

5. Divide the Year 1 Directs (excluding the IRB fee) by 0.29. for Year 1 Indirect Costs
   - ($61,955 - $2500) *0.29 = $17,242 (Year 1 Indirect Costs)
Consulting Agreements

- Check the maximum contracted hours against the PAF effort to ensure that the PAF effort does not exceed the maximum number of hours.
- If travel is anticipated, read any travel clauses carefully. Does the company make travel arrangements for the consultant directly? If the company reimburses the institution, the department needs to understand that only actual travel costs can be invoiced, and the associated IDC on the travel costs that will hit the account will end up coming out of the hourly rate.
- If the department chooses to only invoice for the hours and not to invoice for any travel expenses, the wording in the agreement would need to be updated to indicate these expenses will be reimbursed directly to the consultant.

House Officers

Some grants require an explicit statement of effort to be dedicated to the project. The following guidelines apply to Residents and Fellows regarding effort dedicated to grant-funded research:

1. Residents/Fellows who DO NOT have a dedicated research block during the grant funding period (i.e., who will be on clinical services for the duration of the grant) CANNOT have a percentage of dedicated effort listed and CANNOT request salary support as part of the grant budget. Applications in this case must list (-) or 0% dedicated effort for the trainee. Letters should convey the support of the mentor/program director; all necessary facilities are available to the applicant to complete the research; and the trainee will be able to accomplish the project during the award period. Trainees will be expected to abide by duty hour restrictions including their clinical and research activities.
2. Residents/fellows who have a dedicated research block during the grant funding period CAN have a percentage of dedicated effort listed and may request salary support as part of the grant budget. This excludes residents/fellows who are on a T32 as they are not eligible to request additional salary support.
3. Residents/fellows who are graduating and will have a UMHS faculty appointment which begins immediately following the conclusion of their clinical training program may apply for grants with funded effort when the funding period takes place after graduation, assuming that their program and future supervisor are supportive (i.e., graduating resident who will be starting on the faculty applying for a career development award).

Industry Projects

PAF Attachments

- Draft of agreement (unless Investigator-Initiated) or request in routing instructions for ORSP to provide a draft agreement. Include any requested contract terms (i.e., fixed price or cost-reimbursable; whether the sponsor has already agreed to fund this project; whether publication is anticipated and whether it’s likely that IP will be developed.)
- If a draft contract is attached, a Word version should be uploaded for ORSP to red line.

Budget Considerations

- Project worth – how was the project worth determined? What was sent to the sponsor to lead them to agreeing to fund this amount? Include on the PAF any budget comments that would be helpful in determining the contract worth (i.e., number of patients anticipated, basic breakdown of costs, etc.)
- If Human Subjects are involved, see IRB.
- If Human Specimens/data are involved (even if de-identified), see Data and Biospecimen Policy.
- When preparing a budget for an Industry Sponsor, consider using a full cost budget. A full cost budget shows the total costs of conducting the study, as opposed to the standard budget where direct and indirect (F&A) costs are shown separately in addition to the total cost. For example, instead of requesting $1,000 for travel and $560 for
overhead, consider requesting $1,560 for travel. Representing costs as a full cost may remove some of the
discussion about the institutional overhead recover. If total costs are represented and indirects are not stated,
the following statement needs to be added to the budget/budget justification: “Funds requested include all
university required costs.”

- If Cost-Reimbursable and a budget with built in overhead was used, there should also be an internal budget
attached showing the split of DC and IDC.
- In the PAF ORSP Routing Instructions, include any requested contract terms (i.e., Fixed Price* or Cost-
Reimbursable**; whether the sponsor has already agreed to fund this project; whether publication is
anticipated and whether it’s likely that IP will be developed.

*Fixed Price agreements are based on milestones or submission of deliverables. See Fixed Price
Contracts
**Cost Reimbursable agreements are paid as costs are incurred and invoiced.

Limited Submissions

- If a Funding Opportunity limits the number of proposals an institution may submit, approval to submit must be
obtained and uploaded to the PAF.
- The U-M Medical School and the U-M Office of Research (UMOR) coordinates limited submission funding
opportunities. The Medical School Office of Research manages biomedical limited submission opportunities.

Multiple Principal Investigators (MPIs)

- If there isn’t anything in the guidelines specifying that Multiple PIs are allowed or indication the sponsor will
name more than one person as PI on the agreement/award notice, there should only be one person named
on the PAF as UM PI. The UM Role on the PAF for the second sponsor PI should reflect “Participating
Investigator” rather than “UM PI”.
  o The written application materials can still use the Co-PI designation except for NIH as they do not recognize
the Co-PI designation.
- See NIH Multiple PI Leadership Plan

Other Support

- Unless the sponsor requires effort to be listed in an Other Support document, do not include effort. This
removes the risk of submitting incorrect information.
- Zero effort/CM should not be reflected since participation on a project equates to time, no matter how
small (even if just oversight of the project). Time spent on a project is not dependent on salary recovered
from that project (time might come from departmental research time, etc.).

NIH Specific

Typically, Other Support is requested at Just in Time (JIT) and is not included in the application.

See NIH Other Support Format Pages, Instructions and Samples. New format required for due dates on/after January
2022. See NOT-OD-21-073

NIH Career Development applications require Modified Other Support documents for Mentors and Co-Mentors. See K
Career Development Instructions.

- For Mentored applications, modified Current and Pending documents are required for mentors and co-
mentors only.
- 3-page limit per attachment
- Do not include information on “percent effort/person months” or on “overlap”.

9/7/2021

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NSF Specific
NSF has a specific form to be used to report Current and Pending Support. See NSF-Approved Formats for Current & Pending Support. https://www.nsf.gov/bfa/dias/policy/cps.jsp

For the application under consideration, the dollars, date, title, and effort need to match the information reflected on the proposal.

Per NSF’s Proposal & Award Policies and Procedures Guide (PAPPG), “effort included in Current and Pending support (C&P) may differ from effort requested on a budget. Even though salary is not requested/expended, the individual will be spending time on the project; therefore, a number larger than zero must be reflected on the C&P. If an individual is not requesting salary and will not be spending any effort, the project shouldn’t be included in the C&P document.”

DoD Specific
Required for all Key Personnel at part of application.

Excerpt from DoD General Instructions:

This file must be titled “Support_LastName.pdf” where “LastName” is the last name of the PI.

For all previous (award period of performance ending within the past 5 years), current, and pending research support, include the title, time commitments, supporting agency, name and address of the funding agency’s procuring Contracting/Grants Officer, performance period, level of funding, brief description of the project’s goals, and list of the specific aims. If applicable, identify where the proposed project overlaps with other existing and pending research projects. Clearly state if there is no overlap.

List all positions and scientific appointments, both domestic and foreign, held by senior/key personnel that are relevant to an application, including affiliations with foreign entities or governments. This includes titled academic, professional, or institutional appointments whether or not remuneration is received, and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary).

Report all resources and other support for all individuals designated in an application as senior/key personnel—including for the PI and for other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation. Information must be provided about all current support for ongoing projects, irrespective of whether such support is provided through the applicant organization, through another domestic or foreign organization, or is directly provided to an individual who supports the senior/key personnel’s research efforts.

Report all current projects and activities that involve senior/key personnel, even if the support received is only in-kind (e.g., office/laboratory space, equipment, supplies, employees). All research resources including, but not limited to, foreign financial support, research or laboratory personnel, lab space, scientific materials, selection to a foreign “talents” or similar-type program, or other foreign or domestic support must be reported.

Provide the total award amount for the entire award period covered (including facilities and administrative costs), as well as the number of person-months (or partial person months) per year to be devoted to the project by the senior/key personnel involved.

If there is no previous, current, or pending support, enter “None.” An updated previous, current, and pending support document will be required if an award is recommended for funding.
Office of Research and Sponsored Projects (ORSP)

Communication & Response Times with ORSP
ORSP has published information about their target response time goals and handling of various requests.

This “Communications & Response Time with ORSP” document provides additional information from the Grant Services & Analysis Office to outline how to best contact ORSP, when to follow-up, and, if needed, how to escalate issues. These steps, especially requesting and documenting in the system, may be used with any of the central offices that complete work in eRPM.

RAAC Communications helped put together a Best Practices document.

Project Team Request ORSP Action: Use this activity to submit requests to ORSP whenever possible on an existing file. This will place work in their system work queue. Emails, Posted Comments, and phone calls may not be seen.

Post a Comment: If you communicate with ORSP outside of the eRPM system, it is recommended that project teams record the activity in the eRPM system by posting a comment documenting their activity and checking the box to send the communication to No One and include a summary of the issue with each posted comment. This will document the history of contacts.

In general, the Medical School promotes the approach of “half the distance to the goal” for updates and follow up. For example, for 10 business day ORSP response goal times it is reasonable to ask for an update at intervals after that time expires and subsequent 5 and 3 business days. In the chart below (Blue Example), a PAF arrives at ORSP with a contract for redline on Day 1, requesting an update (if needed) on business days 11, 16, and 19 is appropriate. Likewise (Green Example), if there is a Request ORSP Action which has response time goal of 3 business days, following up on business day 4, 6, and 8 seems reasonable.

<table>
<thead>
<tr>
<th>Monday</th>
<th>Tuesday</th>
<th>Wednesday</th>
<th>Thursday</th>
<th>Friday</th>
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<tbody>
<tr>
<td>1 PAF #1</td>
<td>2</td>
<td>3</td>
<td>4 AWD #2 Request ORSP</td>
<td>5</td>
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<tr>
<td>Arrives at ORSP</td>
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<td>6</td>
<td>7</td>
<td>8 AWD #2</td>
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<td>11 PAF #1</td>
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<td>Earliest ask for update</td>
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<td>(Posted Comment)</td>
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<td>(Posted Comment)</td>
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Recommended Escalations for Update Requests that have NO response:
- Earliest Ask Include PR and Support Staff
- 2 nd Ask Include PR and Support Staff, your department lead research administrator,
Asking the Medical School to Intervene: At the point you have exhausted the process above and would like the Medical School to intervene on your behalf, please be sure that the notes posted to the eRPM system are very clear, contain summarizing information, and were followed to the letter. Then contact us with a specific note asking us to intervene (you can do in eRPM if you check MSGrants as a recipient or send email directly to MSGrants), it can be done right after the 3rd ask. We also ask that the department GPAC Member complete a line in this tracker.

Helpful Hints
- Review the eRPM record to be sure that all attempts have been documented. It should be clear to anyone receiving the issue what the previous contact has been - without needing additional side information.
- Follow the stated ORSP request that you share the impact to the project if there is a lack of completion or response as of the third attempt to connect.
- Be reasonable! Not everything will make it all the time. Be sure that the ones that are important are the ones requested to escalate. Likewise, know that the Medical School can’t escalate everything, and we also must pick and choose among priorities.
- As a friendly reminder, “updates” do not mean that the issue will be fully resolved. Open dialog to understand challenges with executing the request may be necessary. This follow up and escalation schedule is most appropriate to set expectations about communication on the project.

Phone Calls
Although connecting by phone is sometimes challenging, this is still a viable option. (Again, recommended to document messages left through Post A Comment to No One!). ORSP has indicated that even though remote, they are picking up their phone messages.

If something is extremely time sensitive and you need to reach someone by phone, remember that the general ORSP contact phone number is available: 734-764-5500

Rackham Shortfall
Rackham shortfall commitments need to be reflected on the PAF in one of the following sections.
- If the Rackham Commitment IS NOT reflected to the sponsor (no reference within the proposal documentation), the commitment needs to be in the Internal UM Agreement section of the PAF.
- If the Rackham Commitment IS reflected to the sponsor, the commitment needs to be on the PAF as UM Other Commitment.

If the Rackham shortfall commitment needs to be moved from one section to another section of the PAF (i.e., Internal to UM Other Commitment), the commitment should be added to the correct section BEFORE un-selecting the “Other UM Commitment”. Otherwise, Rackham approval will be removed, and they will have to re-approve the PAF.

FYI - the Rackham Web-site states that this should be reflected in the UM Other Commitment section of the PAF. This was before the “Internal UM Agreement” section was added to eRPM. The information on their website hasn’t been updated.

Per Rackham, they will NOT commit to cover a specific dollar amount to cover shortfall. Rackham provides specific language be added to the PAF Internal UM Commitment or UM Other Commitment section of the PAF.
Per Rackham, hard-cost sharing for Rackham support **SHOULD NOT** be on the PAF. If Rackham support is quantified in an application and requires cost-share, the commitment within the application needs to be removed or re-worded so that hard cost-share is not required.

If the Rackham Commitment is in PAF Internal UM Agreement section, the Initial Period and Total Project Amount fields should reflect **$0.00**. Rackham doesn’t want specific dollar amounts reflected in these fields.

More information can be found on the Rackham web-site.

**Recharge**

Per the guidelines for Recharge projects, a new PAF is required each year or when 120% of the PAF’ed amount is collected, whichever occurs first. A new PAF is needed to collect approvals and expected revenue upcoming for the year in adding to the AWD. A new PAF is required even if the amount is not collected to 1) confirm the correct recharge rate is used, not expired, does not need amended, and 2) to discuss with project teams the amount expected vs collected if drastically different to make sure the expectations of the recharge account are in line with reality.

Current rate agreement needs to be uploaded to the PAF.

**Sponsor Specific Guidelines**

**American Heart Association (AHA)**

- ORSP needs to see the Association-Wide Guidelines and Terms & Conditions document. These are needed in case anything changes and the old information is not available. When a project is awarded, they need to use the Terms & Conditions for that period.
- Make sure the AHA Association-Wide Guidelines and Terms & Conditions documents are uploaded to the PAF Sponsor Guidelines section. If you send the PAF back, send them the documents they need to add. If you don’t end up sending it back, upload before approval.
- Be sure to look at the Supporting Documents section online. For some projects, collaborator letters require level of effort.
- See ORSP AHA web page for additional information.

**National Institutes of Health (NIH)**

See our website for helpful information.

- NIH Research Proposal Review Checklist – This new checklist is created for all NIH applications due on or after May 25, 2020.
- NIH Specifics – Tips & Tricks

**ASSIST**

- Most applications can be submitted electronically through System to System (grants.gov).
- If the application is Multi-Project (the FOA will state), you need to use ASSIST since our current eRPM system does not allow for submission of multi-project proposals. That is why Program Projects can only be submitted through ASSIST.
- For instance, the following RFA would need to be submitted through ASSIST. Even though the FOA states that System to System is an option, our current eRPM system does not allow for it.
- The PAF # needs to be in the “Application Identifier field” of the R&R Cover section of the Overall Component.
- A PDF of final ASSIST needs to be uploaded to the PAF.
• Steps for finalization/submission
  • Verify the status of All Components is set to Final
  • Perform validations
  • Update the application to Ready for Submission, using the Update Submission Status Button
  • Upload PDF of final application to the PAF
  • Finalize PAF
• See NIH’s web-site for how to prepare an application using ASSIST.

Biosketches (NIH specific)
  • Not required as part of administrative shell
  • Check page limits (NIH has a 5-page limit)
  • Ensure that effort, dollars, and overlap are not included (in the new format, research projects can be described in A) Personal Statement since section D) Research Support will be removed.)
• See NIH Biosketch Format Pages, Instructions and Samples. New format required for due dates on/after January 2022. See NOT-OD-21-073

Budgets (NIH specific)
See DHHS Salary Cap

NIH requires that the Annual Compensation be listed in the Base Salary field of the SF424 R&R Budget. This field needs to either reflect the individual’s University Comp Rate or be left blank (not a required field.)

OPTIONS FOR REFLECTING ON NIH APPLICATION

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<tr>
<th>Last Name</th>
<th>Suffix</th>
<th>Project Role</th>
<th>Base Salary ($)</th>
<th>Col. Months</th>
<th>Acad. Months</th>
<th>Sum. Months</th>
<th>Req. Salary ($)</th>
<th>Fringe Ben. ($)</th>
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</table>

IF USING NIH CAP

NIH Cap x UM FTE = UM Appointment Compensation rate at cap

199,300 * 0.75 = $147,975

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• If the application is in response to a Program Announcement and more than $500,000 or more in direct costs is requested in any one budget year (excluding consortium F&A), prior approval is required and should be included in the cover letter. An application in response to an RFA is NOT SUBJECT to the prior threshold approval (check the FOA).
• Modular Budgets:
  o If there are exclusions, 1) a note stating the type and dollar amount of exclusions needs to be in the PAF budget comment, or 2) an internal budget needs to be uploaded to show the exclusions.
  o Modular budgets do not allow inflationary increases on salaries at the cap. If NIH requests details at JIT, the departments need to make sure the budget doesn’t include that inflation.
  o See NIH Grant Policy Statement, section 2.3.7.9 Graduate Student Compensation when estimating the number of modules. See the NIH training website for the latest NRSA stipend levels. (Note, not something our office checks, but it’s good to be aware.)
- Modular budgets must be used if directs per year are ≤ $250,000. If Human Fetal Tissue (obtained from elective abortions) is used, a detailed R&R budget must be used regardless of the funding amount and FOA.
- Consistent treatment with cost accounting practices / Uniform guidance, if federal. See Uniform Guidance.

See NIH’s Develop Your Budget for additional information regarding budgeting for NIH proposals.

SUBAWARD BUDGET COMPONENTS

For NIH applications and sponsors following SF424 guidelines, the Budget Periods in the Subaward Budget forms need to be aligned with the Budget Period Start and End Dates of the parent budget. If the consortium is not participating in all years, empty budget periods need to be added to the subaward budget. Excerpt from SF424 instructions on empty budget periods below:

**Budget Period Start/End Dates (align with budget periods and dates of the prime budget)**

In Question "A: Senior/Key Person," provide a single entry including the following:

- PD/PI or subaward lead First and Last names
- Project Role (may default to PD/PI; adjust as needed)
- Calendar Months = .01 (smallest amount effort allowed in the field)
- Requested Salary = $0
- Fringe Benefits = $0

Career Development – “K” series for NIH and Other PHS Agencies

See NIH K Award Admin Shell PDF for additional information.

PERCENT EFFORT AND SUPPORT

**CONCURRENT EFFORT**

The awardee may devote concurrent effort without compensation if the research is related and consistent with the objectives of the K award. Per the NIH Policy guide, there should not be significant duplication of the scope of work.

If effort on an application is concurrent with a K award, a statement needs to be included in the PAF Budget Comment section and include the grant number and end date of support.

**REDUCTION OF EFFORT**

For most NIH Career-Development Awards (CDAs), there is a 75% (9 calendar month) for the first three years of the project.

In the last two years of most K awards (NOT-OD-08-065), the awardee can request a reduction of their effort on their K to 50% if they are a PD/PI or Project Lead on a multi-component on any Federal award. Check the Notice of Award (NoA) in the AWD record for specific requirements.

**For NIH submissions, a letter must be attached to the application from the chair stating the following**:

1. Evidence that the recipient will continue to focus on the development of his/her research career.
2. Will continue to have access to his/her mentor; and
3. That the recipient’s total level of research effort will be maintained and protected at a minimum of 9 person-months (75% full-time professional effort)
Per, NOT-OD-18-157, NIH is updating this policy “to expand the categories of support for which mentored K awardees may request reduction of effort to include peer-reviewed research grants of at least $100,000 in direct costs, obtained from non-Federal sources; e.g., foundations or professional societies.”

The remaining 25% can be used towards additional research, clinic time, teaching and/or other commitments. The awardee may devote time to other projects with compensation (as PI or another role) if the aims are not the same as those of the K and effort is available. **Confirm effort is not concurrent with the K award (if it’s not clearly stated) and the awardee has available effort considering clinic time, teaching and other commitments.** For applications to NIH, a statement needs to be in the budget justification stating that effort is not concurrent with their K.

Charts from NIH Extramural Nexus blog post:
VA APPOINTMENTS

Career Development applicants with a VA appointment, must include a completed MOU in the Budget Justification. The MOU doesn’t have to be signed since it a plan, not a finalized agreement.

Per the Program Announcement for Career Development Awards:

**Level of Effort**

*At the time of award, the candidate must have a “full-time” appointment at the applicant institution. Candidates are required to commit a minimum of nine person months of effort (i.e., 75% of full-time professional effort) to their program of career development during the mentored phase. Candidates may engage in other duties as part of the professional effort not covered by this award if such duties do not interfere with or detract from the proposed career development program.*

*Candidates who have VA appointments may not consider part of the VA effort toward satisfying the full-time requirement at the applicant institution. Candidates with VA appointments should contact the staff person in the relevant Institute or Center prior to preparing an application to discuss their eligibility.*

Continuous Submission Eligibility

- See [NIH's webpage](https://www.nih.gov) for information on eligibility, deadlines, and frequently asked questions.
- Only applies to R01, R21 or R34 activity codes.
- A cover letter must be included in the application

Late Submission Policy - NIH

- Per [NOT-OD-15-039](https://www.nih.gov), there are certain circumstances when a late application (two weeks after the date) might be accepted.
  - One example includes service on an NIH advisory group.
  - A cover letter must be included in the application

Fellowship Applications – “F” series for NIH and Other PHS Agencies


Foreign Component

Prior approval from NIH is required if a foreign component is a part of the NIH proposal. *Submitting a Foreign Justification with the application is considered prior approval.*

ORSP has some guidance [here](https://www.umich.edu).

Departments can contact [InternationalResearchGuidance@umich.edu](mailto:InternationalResearchGuidance@umich.edu) with questions.

From the SF424 Instructions:

6. Does this project involve activities outside of the United States or partnerships with international collaborators? This field is required.

*Indicate whether this project involves activities outside of the United States or partnerships with international collaborators. Check “Yes” or “No.” Applicants to NIH and other PHS agencies must check “Yes” if the applicant organization is a foreign institution or if the project includes a foreign component. See NIH Glossary for a definition of a foreign component.*
If you have checked “Yes” to Question 6, you must include a “Foreign Justification” attachment in Field 12, Other Attachments. Describe special resources or characteristics of the research project (e.g., human subjects, animals, disease, equipment, and techniques), including the reasons why the facilities or other aspects of the proposed project are more appropriate than a domestic setting. In the body of the text, begin the section with a heading indicating “Foreign Justification” and name the file “Foreign Justification.”

Grants.gov
- Division – Medical School for all Med School faculty.
- Department – PI’s primary appointment unit.
  - The Department on SF424 Cover Page and Key Personnel for the PI needs to reflect an NIH recognized department. Centers (i.e., Rogel Cancer Center) and institutes (MNI) aren’t departments that NIH recognizes. If that’s the case, then the Department field needs to be listed as the PI’s primary appointment. The PAF Admin Home does not need to change.

It is important that the Division and Departments fields for the PI are answered correctly since it directly impacts the Med School and Department ranking in the NIH Rankings.

Human Fetal
If using Human Fetal Tissue (HFT) obtained from elective abortions, the following is required:
- PHS 398 Cover Page Supplement
  - See NOT-OD-19-137 for HFT clarification
  - HFT Sample IRB Consent Form – upload a blank sample
  - HFT Compliance Assurance (letter signed by PD/PI) must be uploaded
- Cover Letter: required to include a statement regarding HFT, even if there are no human subjects or associated costs.
- R&R budget is required.
  - Human fetal costs must be included in section F. 8-10 Other, on its own specific line item. If there are not associated costs, enter “0”.
  - The Budget Justification must be clearly labeled as HFT and include: quantity, type(s), source(s) of the HFT and state of development.
- Research Strategy must include specific information in the Approach section for applications proposing HFT.

Multiple PI Leadership Plan - NIH
- Required for applications with multiple PIs.
- All MPIs need to have a role of PI in eRA Commons.
- The credential agency field within the Sr/Key Person section of the application needs to be completed for all MPIs with their eRA Commons Username.
- The NIH does not recognize the term co-PI.
- The Conflict Resolution Statement needs to indicate how conflict will be handled by someone not involved in the project to oversee arbitration.

See our web-site “Multiple PI Leadership Plan” for additional information.

National Cancer Center (NCI) Effort Requirements
NOT-CA-20-047 Policy Regarding Minimum Level of Effort for NCI-Funded Awards
Unless the FOA states otherwise, the minimum level of effort requirements are as follows for those with a PD/PI Role:
<table>
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<tr>
<th>Mechanism</th>
<th>Role</th>
<th>Minimum Level of Effort in person months/year (%)</th>
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<tbody>
<tr>
<td>R01/U01</td>
<td>Single PI</td>
<td>1.8 months (15%)</td>
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<tr>
<td></td>
<td>Multi-PI</td>
<td>1.2 months (10%) each</td>
</tr>
<tr>
<td>P01¹</td>
<td>Single PI</td>
<td>1.2 months (10%)²</td>
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<tr>
<td></td>
<td>Multi-PI</td>
<td>0.96 months (8%) each</td>
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<td>Project PI</td>
<td>1.8 months (15%)</td>
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<td>Core Leader</td>
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<td>R21</td>
<td>Single or Multi-PI</td>
<td>0.6 months (5%) each</td>
</tr>
</tbody>
</table>

**Other Support**

See [Other Support - NIH Specific](#)

**R56 (NIH High Priority Short-Term Project)**

R01 applications that score well but are outside the funding limits are sometimes awarded as an R56. R56s are short term (1–2-year awards) bridging funds to allow the PI to collect data and work on their revised application.

R56 awardees can submit a New, Resubmission or Continuing Renewal Resubmission of their Original R01 competing application to be considered for future funding. The NIH Resubmission policy applies. NIH Allows one resubmission (A1) of an unfunded application.

If an R01 resubmission (A1) or an R01 Continuing Review Resubmission (A1) is awarded as a R56, subsequent submissions will need to be submitted as New submission since the NIH only allows one resubmission.

If an R01 Continuing Renewal submission (A0) is awarded as an R56, a resubmission to the R01 CR can be submitted.

Continuing Renewals of R56s are not allowed, since R56s are not competitive submissions (they are not opportunities that can be applied for.)

**Subaward Consortium/Contractual Arrangements**

A “Consortium/Contractual Arrangements” description must be attached to the SF424 when a subcontract is included. The Letter of Intent to Establish a Subaward Agreement can serve as this description, OR this document can be a description explaining “the programmatic, fiscal, and administrative arrangements to be made between the applicant organization and the consortium organization(s) (otherwise known as the subrecipient(s))”.

See our website “Consortium/Contractual Arrangements” for additional information.

**SBIR and STTR Programs**

[https://sbir.nih.gov/](https://sbir.nih.gov/)

- For SBIR applications, the contact PD/PI must be primarily employed with small business unless a waiver is granted.
• For STTR applications, the contact PD/PI may be from the small business or partnering Research Institution
• If the U-M Investigator is the Contact PI on an SBIR or STTR application, the announcement typically states PI may be employed with the small business concern OR the partnering Research Institution if they have a formal relationship to the SBC. **Verify that the PI reflects YES to Conflict of Interest.**

**Types of Applications**

**COMPETING REVISION – ADMINISTRATIVE SUPPLEMENTS**

**Administrative Supplements** fall under Type 3, Competing Revision.
Per [NOT-OD-20-128](#), effective July 25, 2020, all supplement applications to existing single and multi-project awards MUST be submitted electronically through Grants.gov using NIH ASSIST, Grants.gov Workspace, or institutional system-to-system (S2S) solutions.

Review the awarding Institute and Center's (IC) web site to determine any IC-specific submission deadlines or eligibility criteria before submitting an administrative supplement request.

The **Federal Identifier field** needs to be completed for Revision applications. The IC (two character) and serial number (six digits) of the previously assigned application needs to be added to this field. For example, grant number 3 R01 DK123466-01S1 – use DK123466 (no spaces).

**MULTIPLE PRINCIPAL PROJECTS (MPI)**
If the parent project is a Multiple Principal Investigator (MPI) project, the supplement request needs to have all the MPIs listed on the PAF, even if they are not participating in the supplement. **NIH requires that approval from all the MPIs be obtained for all project changes. By having all PIs on the PAF, this fulfills this requirement.**

When the MPI is at another institution and therefore does not have the ability to sign the PAF, concurrence is needed from the PI(s) to fulfill NIH’s requirement of having written assurance on file.

An email or letter from the file affirming to the following needs to be uploaded to the PAF:

> The PI assures [1] that the information submitted within the application is true, complete and accurate to the best of the PI's knowledge; [2] that any false, fictitious, or fraudulent statements or claims may submit the PI to criminal, civil or administrative penalties; and [3] that the PI agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as result of the application.

**PROJECT DATES**

• Start Date must be a future date, or an error will occur upon G.g validation. See Project Period for additional information.
• Project dates must be within the parent project period.
• If the Program Announcement states that the project and budget periods must be within the currently approved project period for the existing award, the budget periods in the application for the supplement should align the existing grant. As a rule, supplements must fit within the timeframe of the parent project. One option is to align the requested budget period with the current award. See example below.

**EXAMPLE:**
The parent award has a project period of 1/1/2019 – 12/31/2023.

9/7/2021
If the supplement is requesting funds for a project period of 6/1/2020 – 5/31/2021, the first period of the budget would reflect 6/1/2020 – 12/31/20 and the second period 01/01/2021 - 5/31/2021 so that it aligns with the existing grant.

Second option is to use a budget period of 6/1/2020 – 5/31/2021 with the understanding that the funds might all be awarded in one year rather than split into two budget periods.

**ABSTRACT**

- The abstract on the PAF and application needs to be the abstract of the supplement project. The parent abstract summary should include in the Research Strategy section (if G.g submission) or “Other Attachments” if submitting via eRA Commons.

**RESUBMISSIONS**

- The Federal Identifier field needs to be completed for Resubmissions. The **IC (two character) and serial number (six digits)** of the previously assigned application needs to be added to this field. For example, grant number 1 R01 DK 123446-01A1 – use DK123466 (no spaces). The PI may have to provide this information.
- NIH Allows one resubmission (A1) of an unfunded application. See the NIH Resubmission policy.
- Applications can be submitted up to 37 months after the application due date of initial application. See related policy notice.
- See NIH Resubmission Frequently Asked Questions
- Deciphering NIH Application / Grant Numbers

**RENEWAL (CONTINUING RENEWAL)**

The Federal Identifier field needs to be completed for Renewal applications. The IC (two character) and serial number (six digits) of the previously assigned application needs to be added to this field. For example, grant number 2 R01 DK 123446-06 – use DK123466 (no spaces).

**Department of Defense (DoD)**

**Guidelines**

General Application Instructions should be read in conjunction with the Program Announcement. The General Instructions Document is available by downloading from the grants.gov funding opportunity announcement. Select the Package tab, click preview, and select “download instructions”.

**Current/Pending/Ended Support**

See DoD Specific

**SF424 Application Page**

In the Federal Identifier field, enter the PI’s eBRAP Log Number. This number is obtained in the pre-application state. Start date:

- Refer to the General Application Instructions. **Typically**, the start date should be 9/30 or earlier since funds need to be used before the end of the federal fiscal year.
Research & Related Budget Form

- All Senior/Key personnel involved in the project must be reflected in this section of the budget even if they aren’t devoting specified effort. The form sets in eRPM require that the “Cal Month” field be filled in. Enter “0.01” in the CM field and $0 for those who will not be devoting specified effort.
- Per DoD General Guidelines, full-time rate base salary must be reflected in the base salary field.
  o For U year faculty, the base salary might not appear correct. There is no guarantee of summer salary, so sometimes the base salary field will reflect their 9-month salary.

BUDGET JUSTIFICATION

Helpful Tips:
Note – these are suggestions (might save time at JIT) but not required for Medical School Admin Shell approval.
  o Provide a clear justification for each item.
  o Itemize Travel (include meeting name, purpose, location and date if known)
  o For materials and supplies that are $5,000 or more per year, provide additional breakdown.
  o Fringe Benefit Statement
    o Example if using an estimated fringe rate:
      *Per our F&A rate agreement negotiated with DHHS, and dated XXXX, “the fringe benefits are specifically identified to each employee and charged individually as direct costs”. Actual rates will be based on the selection of benefits by personnel assigned to the project. We have used an estimator of XX%.*

  • Indirect Cost Rate Statement
    o Example:
      *The University of Michigan has a DHHS approved indirect cost rate of XX% approved XX/XX/XXXX. The indirect cost rate is applied to the modified total direct cost (MTDC) base excluding equipment, capital expenditures, patient care expenses, tuition remission, off-site rental costs, scholarships & fellowships, and the portion of subcontract more than $25,000.*

Michigan Department of Health and Human Services (MDHHS)

HHS Salary Cap

DHHS salary cap should only be used for there where the prime sponsor is a DHHS agency. If no prime or the prime is not a DHHS agency, actual salaries need to be used. See caveat below.

From: Sierra, Jane <jmsierra@med.umich.edu>
Sent: Thursday, October 29, 2020 11:15 AM
To: msgrantreviewers@umich.edu
Subject: FW: MDHHS FY21 Salary Cap Language

MDHHS funding for this year FFY is still being held to the HHS salary cap.

From: Brant, Elizabeth <Ebrant@med.umich.edu>
Sent: Friday, October 23, 2020 10:50 AM
To: jmsierra@umich.edu
Subject: MDHHS FY21 Salary Cap Language

*On Page 21 of attached agreement section Q. Cap on Salaries*

*Cap on Salaries None of the funds awarded to the Grantee through this Agreement shall be used to pay, either through a grant or other external mechanism, the salary of an individual at a rate more than Executive Level II. The current rates of pay for the Executive Schedule are located on the United States Office of Personnel*
Management web site, http://www.opm.gov, by navigating to Policy — Pay & Leave — Salaries & Wages. The salary rate limitation does not restrict the salary that a Grantee may pay an individual under its employment; rather, it merely limits the portion of that salary that may be paid with funds from this Agreement.

IDC Rate
MDHHS allows a different Indirect Cost Rate percentage depending on what pool of funding they will utilize for each project. A notice was issued in 2015 stating:
- General Fund/General Purpose and/or State Restricted Funding: 10% indirect cost rate
- Block grants and Medicaid funded projects: 20% indirect cost rate
- Federal grant applications: 26%; recommended to cap at 20%. NOTE, 20% should be used since 26% will not be award based on prior experience.

MDHHS Master Contract Agreement
For projects that fall under the MDHHS Master Contract Agreement, do not exceed 20% IDC rate. Most projects fall under the MDHHS Master Contract Agreement. The exception would be when we are a subcontractor. In instances where we are a subcontractor and the project is not part of our Master Agreement with MDHHS, we should ask for our full IDC recovery.

Application Components
- Excel budget on a standardized template (okay if converted to PDF)
- Work Plan
- Budget Justification - ORSP needs a budget justification when the entire package of projects is submitted to MDHHS; therefore, each project needs a budget justification from the beginning.

INSTITUTIONAL NUMBER
The Institution Number (INST #) needs to be included in each Component (Justification (top), Work Plan (top), Budget – usually after the title in the Program field or in the Contractor Name field). The INST # is the PAF Number minus “PAF” (i.e., 19-01234).

Sometimes, proposals come through with EGrAMS summary documents. There is a specific space in that form set for the INST#.

NEW OR AMENDMENT
- For New proposals, all information between the PAF and Documents should match.

For Amendments, the PAF should show only new funding and effort while Documents should include the entire budget/proposal, not just the new funding. (An internal budget showing the new funding can be uploaded to proposal documents for internal purposes.)

BUDGET
In the Program Budget Summary, there will be at least two tabs.
1. Program Budget Summary which gives totals of all categories and details where the money will come from. Some MDHHS proposals are 1:1 split between the sponsor and a local match. The local match is UM or one of their community partners (Starfish takes on this role often).
2. The second and all subsequent tabs (titled Program Budget – Cost Detail Schedule) detail each category.

Michigan Department of Health and Human Services (MDHHS) Effort Representation
Effort should be listed as FTE. For example, 9 CM would be represented as 0.75 in the Cost Detail Schedule. If the project period is less than one year, be sure FTE is correctly reflected.

EXAMPLE: See exemption below.

9/7/2021
If an investigator is devoting 15% over 10 months, that would be equivalent to 0.125 FTE.
To calculate, take the % Effort, divide by 12 and multiply by the number of months.
OR, take the % Effort multiplied by the number of months to get the CM. Divide the CM by 12 to get the FTE.

Departments have reported having issues in eGRAMS when representing effort as FTE for projects less than 12 months. Departments can list % effort over the time period (i.e., 15% over 10 months), if a qualifier is included in the Budget Justification. Example: “FTE for personnel equals percent effort for time on project” and indicate % effort over # of months in the justification description (i.e., 15% effort for 10 months)

For Partial Appointments, when listing % of University on Budget Form/Justification, an explanation needs to be added to the justification description to explain that FTE isn’t reflected on the Budget.

We typically expect FTE to be reflected but understand that it doesn’t calculate correctly in EGrAMS. We are okay with listing % of Univ appt, but would expect to see an explanation in the justification

Be sure that the Budget Agreement box is correct between Original or Amendment on each tab of the budget.

If a project is utilizing a 1:1 split, the Program Budget Summary will utilize 3 columns in the budget section instead of just the total budget column. One will be a column for the state funding (could be titled State, 50%, or anything else that makes sense), a Local column (for the cost sharing/community partner funding), and the Total Budget column. The Total Expenditures rows need to match or come within $1 for the state and local funding but the dollars must be rounded to the nearest whole dollar.

If a Community Partner is contributing to the cost, they must be listed after row 15. Other(s) with their name and amount to be paid in the appropriate column.

Tips and Notes
The title is listed in multiple places. Make sure it is consistently reflected in all places.

Check the dates in the Work Plan for each Activity. The date range needs to stay within the budget year.

If a renewal, the PAF needs to show the Related Award number with the understanding that a new AWD# will be assigned when funded.

National Science Foundation (NSF)
Budget/Budget Justification
As a general policy, NSF limits the salary compensation requested in the proposal budget for senior personnel to no more than two months of their regular salary in any one year. (See Exhibit II-3 for the definitions of Senior Personnel.)

NSF’s Proposal and Award Policies and Procedures Guide (PAPPG) states that the University’s definition of the term “year” must be defined in the Budget Justification. ORSP recommends that the following statement be included in the Budget Justification.

"The University of Michigan uses the following definitions for the purpose of calculating the two-month limit on salary requested in the proposal budget for senior personnel:
• A calendar year is the 12-month period starting January 1 and ending December 31.
• A fiscal year is the 12-month period starting July 1 and ending June 30.
• A University Year (aka U-Year), per Sec. 5.01 of the University of Michigan’s bylaws and as used in connection with appointments of members of the faculty and other personnel, contains any two terms in the calendar, as defined for the year in question."
Co-PIs
If an individual is listed as a co-PI we expect them to be listed on the PAF as a UM PI since our understanding is that NSF co-PIs are multiple PIs. If investigators are designed as Co-PIs and are not reflected as UM PI on the PAF, confirm their role.

Cost Sharing
Inclusion of voluntary committed cost sharing is prohibited.

Research.gov
When using Research.gov to prepare and submit application, the options for entering information do not always match the fields that populate.

For instance, in the budget personnel section, there is not an option for academic/summer/calendar. There is only a field for “months”.

Senior Personnel
Per the PAPPG, if effort or salary are not being requested for Senior Personnel, they should be removed from section A of the budget and the budget justification. A description about the person’s participation can be included in the Facilities Section of the proposal. **NOTE, this policy might not always apply since non-PIs cannot be listed on the Cover Page.**

Except from PPG:
(c) Procedures The names of the PI(s), faculty, and other senior personnel and the estimated number of full-time-equivalent person-months for which NSF funding is requested, and the total amount of salaries requested per year, must be listed. For consistency with the NSF cost sharing policy, if person months will be requested for senior personnel, a corresponding salary amount must be entered on the budget. If salary and person months are not being requested for an individual designated as senior personnel, they should be removed from Section A of the budget. **Their name(s) will remain on the Cover Sheet and the individual(s) role on the project should be described in the Facilities, Equipment and Other Resources section of the proposal.** For postdoctoral associates and other professionals, the total number of persons for each position must be listed, with the number of full-time-equivalent person-months and total amount of salaries requested per year. For graduate and undergraduate students, secretarial, clerical, technical, etc., whose time will be charged directly to the project, only the total number of persons and total amount of salaries requested per year in each category is required. Compensation classified as salary payments must be requested in the salaries and wages category. Salaries requested must be consistent with the organization’s regular practices. The budget justification should detail the rates of pay by individual for senior personnel, postdoctoral associates, and other professionals.

Students
Graduate Student Research Assistants (GSRA)
When listing GSRA in an application, the salary requested on the budget may appear incorrect, even when it’s correct. Below are a few acceptable options that can be included in the justification if the project team wants to include an explanation.

- “GSRA have a 0.5 FTE appointment at the University and the base salary reflects the reduced appointment.” This statement is only applicable for applications where a base salary is reflected.
- “X will devote 6 calendar months, which is equal to full time research effort for a GSRA.”


• “X will spend his full university appointment, which, under GSRA contract, is 6 calendar months.”
• “X will devote 100% of her appointment to this project. Under University of Michigan policy, GSRAs are contracted appointments of 6 calendar months.”

For information on budgeting GSRAs see the Frequently Asked Questions section and view “The Budget/Justification Issues” section.

**Undergraduate Students**

If undergraduate students are included in the budget, we need to recover at least 7.64% for FICA for fringe benefits.

**Subrecipient/Hybrid Agreement/ Purchase Order**

ORSP’s website explains the differences between the various types of agreements. [https://orsp.umich.edu/develop-proposal/subawards-hybrid-agreements-and-purchase-orders](https://orsp.umich.edu/develop-proposal/subawards-hybrid-agreements-and-purchase-orders)

• A Purchase of Service Agreement is a contract for the provision of services (paid via a hybrid PO).
• Subawards primary purpose is to perform part of a project as an equal collaborator.

**Indirect Cost Recovery**

For Subawards, indirects are recovered on the first 25k of subcontracts (if the sponsor recovers the full federal rate). IF the sponsor does not recover the full federal rate, there shouldn’t be exclusions from the base unless stated in the sponsor guidelines.

For Hybrid PO/Purchase Orders, indirects are calculated on the TOTAL AMOUNT of the PO.

**NOTE:** As a Fee-for-Service agreement, the terms & conditions flow down to UM. We would expect to recover our federally negotiated rate for the project.

**Subrecipient Statement of Collaborative Intent**

When U-M is a Subrecipient:

- Subrecipient Statement of Collaborative Intent was established to be used when UM is the direct sponsor. Ensure the new form is used. The previous form is no longer accepted.

There is no longer a separate form for when U-M is the subcontract. When the direct sponsor does not provide a form, the U-M Subrecipient Statement of Collaborative Intent can be used. The following edits are needed:
  o Update the top line from University of Michigan as the PTE to the direct sponsor.
  o Or, you can just change #1. PTE PI, to represent the direct sponsor PI and their institution. U-M’s information is to be included in section #2. Subrecipient Proposal Information Example below.

![Subrecipient Proposal Information Example](image-url)
• On the Subrecipient Commitment Form, the assurances should be the University-wide numbers and not the specific HUM or PRO numbers. For human subjects, the assurance number is 00004969 with the approval date for the specific protocol or “pending” if not yet approved. For the animal protocols, this should be A3114-01 with the approval date for the specific protocol, or “pending” if not yet approved. See ORSP Frequently Requested Proposal Information.

Uniform Guidance
Uniform Guidance (UG) is a set of rules and requirements for how Federal Awards can be spent.

UG does not apply to non-Federal awards. Non-federal sponsors may have specific requirements. Be sure to read sponsor guidelines and terms & conditions.

Items such as postage, office supplies, computers, hosting and administrative staff support are expected to be provided by the university and are covered by indirect costs. If expenditures are requested that are typically unallowed as direct costs, Under the Uniform Guidance Policy, these costs need to be adequately justified to show how they are allocable and allowable to the project under the Uniform Guidance Policy. The justification needs to include an explanation of why these items are necessary to complete the proposed research project and how usage will be allocated only to the project.

For NIH Modular applications, for UG items to be allowable without additional sponsor approval, an additional narrative needs to include the item, dollar and justification.

Example from ORSP’s web-site:
The circumstances surrounding the expenses in this category play a major role in determining whether to treat as an exception, i.e., to permit as a direct charge. As an example, computers are necessary to the overall administration of a sponsored project. Purchasing computers for this purpose would generally be considered an indirect cost expense -- part of the normal wherewithal the institution can reasonably be expected to provide for its research staff. Purchasing computers to control and monitor scientific equipment, however, represents a different circumstance or use of that equipment and would typically be allowed as a direct charge.

Veteran Association (VA) Appointments
Refer to our website regarding UM/VA Split Appointments here, under BUDGET TEMPLATES / VA MoUs & VA Cost Share Form.

If applying to NIH, language about partial VA appointments needs to be in the justification.

Example: “Since we are applying to NIH, would you please add language to Dr. X’s section of the budget justification indicating that he has a VA appointment, which part of his appointment his time on this project will come from, and that a division of his total professional effort between the University and the VA is formally described in a written Memorandum of Understanding?”

VA faculty with effort cost-shared on an NIH proposal
• The commitment needs to be reflected on the PAF in the Non-UM Cost Sharing and Other Commitment Budget Component. The Cost-share approval should be uploaded to this section.
• If the person has a U-M appointment, they can be reflected on the R&R budget.
• VA needs to be listed as a Performance Site in NIH applications if VA space will be used.
• Either UM or VA can be listed as the organization in the application. VA faculty have split appointments.
RESOURCES

Medical School Grants Review & Analysis Office
- Proposal Review Checklists
- Budgeting & Costs
- Grant Routing Deadline Calculator
- Service Policy on Submitting PHS Proposals
- NIH Specific Tips & Tricks
- Proposal Sampler
- Space FAQs

Office of Research and Sponsored Programs (ORSP)
- Deadline Policy
- Find Funding
- Develop Proposal
- Route & Submit Proposal
- Policies & Procedures
- Training & Workshops