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## *Comments for* **Institutional Officials**

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### **A7 Reasons the University requires a detailed budget**

- We have gone to a modified budget requesting information on IDC exclusions only
- Detail budget is reviewed for: \*Fringe Benefits \*Appropriateness of costs \*Determining the F&A is calculated correctly based on MDTC
- So they can manage to the detail budget
- To ensure all costs are captured
- we track faculty effort and we use budgets to verify that the appropriate \$s have been requested, that they, in fact, should be requesting using the modular format, and that the indirects are calculated properly. We also feel that is a very helpful tool for the department administrators to help monitor expenditures
- To track possible future effort on all personnel as well as how budgetary items will be appropriated for fiscal budgets. Detail budgets are a must for all grant submissions regardless if modular or not.
- G&C Accounting requires detailed budgets for set up in the accounting system.
- Despite training, faculty forget to include fundamental cost categories, e.g., fringe benefits, tuition (grad students), or other major cost categories. Some departments have administrative support, which prevents these types of errors, but- the majority of departments do not.
- they thought through the process and we can track their spending
- We need to know their release time vs. summer salary as well the costs that are excluded from indirect cost calculations
- To accommodate the needs of the post award Office of Business and Financial Services
- To ensure that all costs of the project are included in the budget and that there is not financial risk to the institution
- We find it more helpful for them to cost out their project, especially for new faculty.
- We use the information to populate our information system, e.g. pending support and time and effort reviews.
- It's the only way to check if the requested modular amount corresponds to the budget needed for the research proposal.
- We need the detailed budgets in order to monitor time and effort issues and to determine whether the number of modules is adequate to perform the scope of work.
- We need to calculate the indirect costs requested. Deans/department chairs need to know if a faculty member will need to have someone to replace him/her in the classroom for teaching purposes, as well as the number of graduate assistants who may be participating in the research.
- In order for USU to make sure that the faculty have included all the correct rates, and to make sure that all costs are appropriate.

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- To make sure investigators have planned for salary funding from the proposal for the number of hours they propose to work on the proposal. Also, to determine that they have budgeted appropriately for the experiments.
- We want to review the dollars requested behind the modules.
- The first reason is to insure that a PI is proposing the appropriate modules. The second reason is to insure institutional F&A is applied correctly and a final reason is to expedite award set-up because a detailed budget is required for account set-up. Audit reason applies here as well.
- The departments and schools have found that detailed budgets are required for planning purposes.
- The detailed budget is required by the University for the use in establishing an accurate allocation by University object code (salaries, wages, benefits, travel, materials/supplies, etc.) during account setup.
- to ensure appropriate effort, salary and fringe rates and to ensure appropriate calculation of indirect costs
- To make sure the thought process that went into developing the module is consistent with the scope of work and level of effort committed to the project.
- A rough budget to be sure PIs are using correct salary and fringe rate, annual escalation rate, calculating the number of modules correctly and possible need for additional module. Also, to be sure indirect costs are being calculated correctly.
- For three reasons: to accurately calculate F&A, to ensure that their budgets are adequate and reasonable, and because if awarded, the PI will ultimately need to produce a detailed budget anyway for the institution to set up his/her grant account.
- We want to make sure that the modular amount requested will allow the PI to cover the salaries of personnel at the percent effort listed.
- My office requires enough information to ensure that A21 issues are considered and that the MTDC is correctly calculated and that correct fringe benefit rates are used. We also must identify cost share and collaborative units for approvals. Departments and schools are concerned that adequate funds have been budgeted. The detail budget is also used in project planning and management. We offer an alternative information sheet which identifies the items above, but there has been no use of this alternative.
- Yes, so that the PI's can better estimate their budgetary needs and so our financial office can help the PI's manage their budgets post award, i.e. time and effort of personnel, supplies, travel, etc...
- So that we can estimate indirect costs and decide on the number of modules needed.
- Institutional setup.
- Not really detailed, but I need to know who will be supported by the grant and to what extent. I also like to know about travel and equipment. This can be done in conversation.
- For internal purposes to verify that costs requested are allowable and reasonable for the research intended to be done.

## **A7 Reasons the University requires a detailed budget**

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- Yes, to be sure that all costs are covered.
- to help the p.i. think out what is needed for their project, especially budgeting for salaries. Otherwise, how would they know whether they need a \$175k grant or a \$225k one?
- We work through the detail to determine the appropriate number of modules.
- The Division of Business and Finance requires a detailed budget to be submitted internally with the modular budget. This is used to verify indirect costs and to track spending in appropriate cost categories.
- Determine budget thoughtfulness and levels of effort- F&A and not F&A budget categories; if budget is reasonable and allowable...
- We need to know how much the proposed project will cost so that the PI will not get caught short when conducting the research. We need accurate costs (including exclusions) for calculation of F&A on the modular direct cost base.
- for planning purposes. to ensure the PI has thought of all possible expenditures, i.e. animal care costs, humans subject costs, mandatory university fees such as graduate tuition.
- Dept and College need to know what the expenses are especially as they relate to personnel effort and salary information. Need to know about equipment purchases.
- Primarily for internal planning.
- We will not approve a proposal submission without a budget breakdown because we need to know what commitments have been made by the P.I.
- We need to approve all budgets that are submitted for external funding. Some involve institutional space and commitment, and these need to be addressed beforehand, as does a faculty members' effort on a grant.
- Only partially detailed - we require detail for personnel commitments so that department chairs can review these commitments on grants when authorizing proposals and we need to know the amount for excludable items.
- If grant is awarded we need the breakdown of funds per category in order to set up our accounting system.
- To check that they are requesting enough money to cover their research needs and to review their fringe benefits.
- Even though the proposal is modular we still monitor the spending to make sure all regulations are being followed.
- to help researchers request correct number of modules and to assure recovery of costs to do their research
- We have to have some kind of estimate to review to see if it's applicable with our state/internal regulations and audit requirements.

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- So the institution can make sure correct salary, fringe, patient care costs and other per diem rates are calculated appropriately. Also so the institution will know what time commitment the staff will be contributing to the project for Time & Effort reporting purposes and future Other Support requests even though this information is on the modular budget page.
- In order to determine who is being paid from the grant and to insure that the cost is calculated appropriately and that the work can be done within the amount requested.
- to ensure that the specific aims of the grant can be accomplished within the budget requested and to set an expected level of effort on the grant for key personnel
- First, to make sure they are requesting adequate funding for the costs of the project; and, second, to be able to plan for resources needed if grant awarded.
- Helps us calculate IDC, fringe, determine allowable costs, etc.
- So that we know they are using the correct rates for fringe, tuition, and indirect costs when they put their modular numbers together.
- Our sponsored projects office does not require detailed budgets, but some departments/colleges do, in order to ensure % effort and salaries budgeted are appropriate.
- This is done mainly to calculate the indirect costs correctly, but also to ensure appropriate levels of salary/wage and benefit amounts are used.
- For Finance Department record keeping.
- To ensure that they are capable of doing the project for the required modular amount
- To make sure they are including the appropriate salaries, FB, etc. and not including items that violate the cost accounting standards.
- For internal purposes. To keep track of allocated funds and for internal accounting budgeting purposes.
- In order to verify the requested modules as well as budget items that affect the F&A base
- Detailed budgets are requested to ascertain that the correct fringe benefit rates are being used and that the F&A costs are computed on salary and wages only.
- We use PeopleSoft accounting modules. For accounting purposes, traditional budget categories need to be used anyway. It is easiest to set up these categories at the proposal stage, even though they might change when the award is made.
- The University's financial system requires budget line item detail. The internal budget is a check on the allowability of budget items and is the source document for award implementation.
- Because we work on MTDC, having a detailed budget is the best method to accurately calculate indirect costs. We also require the detailed budget to help investigators estimate the number of modules they will need each year.
- Budgets must be CAS compliant per A-21 therefore we need to know what constitutes each module requested under the NIH modular grant program. We also need to ensure they are following institutional guidelines in their budget estimates.

## **A7 Reasons the University requires a detailed budget**

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- Our experience that many investigators do not understand the full cost before choosing the number of modules. Competing renewals are exempt from this requirement.
- To ensure cost compliance, accurate budgeting, and to verify IDC.
- It allows both the PI and our office to better determine the correct amount to request each year and if a modular budget is the right mechanism. At time of award, the finance dept will have a budget that can be used to set up the account.
- To calculate F&A costs and obtain total figures for Face page
- Internal controls, need for proper budgeting
- PIs do not always think about issues such as fringe benefits or Cost Accounting Standards, etc. The detailed budget gives the dean's office a chance to make sure that nothing has been inadvertently neglected.
- THIS IS SUGGESTED TO THEM TO HELP THEM DETERMINE HOW MUCH THEY NEED TO REQUEST FROM NIH/ ALSO SAVE TIME, ONCE THE AWARD IS MADE, THE PI WILL HAVE HIS/HER ITEMIZED BUDGET FIGURED OUT ALREADY
- Calculating IDC appropriately; certifying salaries; determining committed cost share; determining costs budgeted are allowable
- Need budget data to calculate F&A, and to serve as basis for account set up when grant is awarded.
- We prepare a detailed budget for the PI so that they are aware what they will be able to support with the budget level requested and to ensure the scope of the proposed work is reasonable given that funding level.
- To help the PI to expend his budget following the A21 regulations.
- We ask them to submit the summary budget page that we have modified for our use. This helps us: 1.verify the F&A base; 2.have budget categories when awarded; 3. get answers on certain costing questions (such as the sensitive costs in OMB A-21, F.6.b.)
- We need the detailed information in order to correctly calculate the indirect costs
- Department Managers, to measure if all costs have been considered.
- To insure that all project costs have identified; to insure that the appropriate number of modules are requested; to provide line item detail for budget set up in the institution financial system following award
- To make them think about their costs. Also, if awarded it makes it easy to set up their projects or if cut to decide where to cut.
- To facilitate the setup of the new awards when they are received from the NIH.
- The detailed budget is needed to calculate the overhead. Having the detailed budget ahead of time enables the grant set up process to go quickly and smoothly.
- To improve the analysis and planning, to ensure correct # of modules are requested, impossible to calculate F&A without a budget

## **A7 Reasons the University requires a detailed budget**

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- To ensure that funds necessary to carryout the project are requested; ensure that correct number of modules is requested; track time and effort; track committed cost share; monitor subcontractors.
- The College of Medicine requires the key personnel breakdown, showing effort and salary requested and any items that would be considered exclusions from F & A.
- University needs to be sure that all categories for research program as well as per cent effort of each key persons are calculated correctly.
- PIs are required to submit detailed budgets to be sure all costs are included as appropriate and to be sure that cost estimates are correct. This is particularly true in review of the F&A calculations. These detailed budgets are also very helpful to have for post-award administration.
- Need it to calculate F&A. Also need budget to determine how many modules are needed.
- In order to determine the level of commitment required of both the key personnel and other support staff. Also used as a budgetary tool in the following years.
- Internal accounting
- We need them for internal review, prior to approval the numbers of modules.
- Departmental and Center Grant Administrators are not very strong. As such, the central OSP requires annual detailed budgets to ensure that the PI requests an appropriate amount of funds to (1) meet modular submission requirements and (2) to be able to conduct the research as proposed.
- To determine the exact expenses proposed
- To assure adequate funding is requested.
- To ensure that they've included all appropriate costs in their estimates, including fringe benefits.
- We review budgets for possible inclusion of unallowable cost items.
- Our accounting office (post awards) wants to track spending.
- We use it for our institutional planning.
- (1) investigators and departments need to be sure they're requesting the right number/size modules (2) the correct indirect cost calculation can't be made without knowing what's excluded (3) we compare the personnel percentages addressed in the application with the percentages on the internal budgets...and frequently find discrepancies! (4) We need to be sure that subcontracts are handled correctly and accurately
- It's the only way to estimate the costs of the project and properly identify the correct number of modules.
- So that we may establish a budget in our general ledger system and monitor spending by line item.
- To ensure fiscal integrity, especially cost accounting standards and exceptions

## **A7 Reasons the University requires a detailed budget**

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- 1. To review for correct F&A, and Fringe benefit rates 2. To review for compliance with NIH and institutional requirements 3. To verify the calculation of F&A on the check list page 4. To confirm that the correct number of modules has been requested. 5. To have on hand when institutes ask for same at JIT.
- We must be able to compute the appropriate indirect costs. If there are subcontracts, equipment and tuition included in their estimated modulars, we could be submitting a budget that is completely inaccurate with respect to indirect costs.
- to get a feel as to whether they are asking for the correct number of modules. It also allows us to determine the correct amount of indirect to request. The "detailed" budget for NIH is not as detailed as others budgets are.
- 1-to ensure that all costs were considered in determining the number of modules to request 2-to use as an initial budget once awarded to help PI track expenditures
- To ensure that they are not over committing resources or personnel
- So that we can be sure no unallowable costs are planned and so that we can accurately calculate the F&A.
- To ensure PIs think about all the issues that will need to be considered as they develop their budgets, either modular or full-blown.
- To determine appropriate IDC and verify University accounting guidelines
- We ask for a budget for internal review purposes (1) to ensure that F&A costs are correctly calculated and (2) to ensure that number of modules requested is reasonable.
- 1. To review for allowable, unallowable costs under University, federal, Program Announcement regulations. 2. To check that all budgeted costs are justified for the project. 3. To verify that modules and F&A costs have been calculated correctly.
- Dean's office in medical area wants to review budgets to assure they are in compliance with division policies
- To verify the numbers used and to calculate F&A cost base.
- A detailed internal budget helps to ensure that the amount requested is realistic and that the PI/s will be capable of undertaking the proposed research with the money requested.
- so that we can be sure the PI has requested sufficient number of modules to support the personnel & supplies needed for this project.
- For proper management and for the generation of informative budget-to-actual performance reports for Principal Investigators.
- We don't require detailed budgets but enough of a budget that we can verify that the proper fringe benefit and indirect cost rates are being applied.
- So we can calculate the F&A's and review the budget for unallowables.
- So I know what modular they will fit in and if the grant is awarded, I know how to budget and set up their account.
- emphasis on fiscal year detailed lab budgeting, including grants helpful exercise for lab administrators

## **A7 Reasons the University requires a detailed budget**

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- In the proposal phase, it helps us apply the appropriate benefit and indirect cost rates, verify salary information, and all other cost. If the proposal is awarded, the detailed budget must be sent to our Grant and Contract Accounting office to be entered into the system.
- To be compliant with CAS requirements, to spend as we budget. For consistency in internal processes.
- To assure that all costs have been anticipated and that costs have been derived in a reasonable manner.
- (1) Verify time commitments (2) Verify asking for correct number of modules AND (3) calculate the Indirect Costs required on the Checklist Sheet
- to make sure they have truly considered all the costs involved
- Proper stewardship of federal funds
- Detailed budgets serve two purposes: (1) causes PI to evaluate the work proposed and the real cost of conducting that work; basis for the modular budget; (2) Accounting requires a detailed budget to set up the account
- In order to assure that proper fringe rates, salaries, etc. are applied; that only allowable costs are charged; and in general to ensure compliance with University policy
- To validate F&A base; to determine appropriate level of budget; to determine appropriate classification of planned expenses
- We require a detailed budget to ensure accurate rates are used for personnel, travel, consultants, and other direct costs, as well as indirect or F&A costs, before determining the number of Modules. Also, we must be consistent under CAS in estimating, accumulating and reporting costs, and feel that an original detailed budget is required to track for compliance in this area.
- There is no other way to know how to calculate the indirect costs; we also have a research foundation that insists on a detailed budget at the time of award.
- 1) To calculate indirect costs correctly for checklist page 2) Requiring it internally demonstrates good management/oversight practice
- So we know what is in their budgets to ensure allowability per Fed Regs and Institutional policies.
- So we can be sure they have included all appropriate costs and calculated the F&A costs appropriately, and so we can apply with the CAS provision of A-21 which requires us to be consistent in estimating and expending grant funds
- Our office does not require them, but some departments require the budget to be submitted for internal purposes. Our prefers budgets to be submitted with the proposal at the time of review.
- To ensure cost accounting principles are being followed.
- To ensure that all necessary costs are budgeted, that we are requesting the correct number of modules to cover the costs over the five years of requested support and that we know what the MTDC against which the F&A are calculated is.



## **A7 Reasons the University requires a detailed budget**

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- Detailed budget preparation at the proposal stage more accurately projects the total cost of a project and avoids under or over estimates of the requested funding. Our budget spreadsheet makes budget preparation easy and encourages proper management of the award. It also provides proof of consistency in budget preparation for all sponsored projects proposals.
- To ensure proper planning, accurate expectations, and compliance with budgeting rules
- Reality check for PI. Opportunity to identify non-allowable costs. Ability to calculate F&A appropriately.
- Departments may require detailed budgets to ensure proper costing; central office requires detailed budgets to establish awards
- We require them for calculation of indirect costs, possible tuition cost share. We also need it at the award stage in order to set up a line-item budget in the university financial system.
- To assure that the investigator has requested the appropriate amount to complete his work and that once the award is made we have record of how he/she plans to spend the money
- To assure that their request for financial support is realistic, in terms of salary and other expenses.
- At the time of award we require a detailed budget to be submitted that reconciles to the amount awarded on the NGA. This is required to determine that all costs charged to the grant are allowable.
- Certain colleges/departments want detailed information about personnel commitments to the project. This is important when individuals from several colleges/departments are involved in the project.
- We find that budgeting is a good process for the PI to go through to be sure they aren't forgetting important items like fringe benefits and travel costs, etc.
- We want verify that requests are reasonable. Also when awarded we can set of the project budget according to the detailed budget.
- For internal documentation purposes.
- for internal planning purposes
- So there won't be surprises when it's discovered they have left important items out or have used incorrect rates that greatly affect their budgets
- most individual departments require their faculty submit a detailed budget to be sure they are capturing their true costs and needs. The School of Medicine and University do not require it for sign-off but recommend they prepare detailed budgets.
- To determine that they will have the resources needed to complete the work
- for our accounting system
- At the time of submission our Institution requires a general budget. Once awarded our office requires a detailed budget in order to distribute the award.

## **A7 Reasons the University requires a detailed budget**

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- We have internal forms which need the endorsement of the PI's Chair and Dean. In one of our schools, the Dean requires a detailed budget regardless of how submitted to the external agency. Detailed budget does not need to match the Modular amount as the Dean is reviewing/approving the salary and effort of the faculty.
- We just want to make sure they've thought through what their projects are going to cost.
- To ascertain whether or not there is any equipment since it doesn't have to be justified, but does have an impact on the F&A calculation
- We still must adhere to A-21 and ascertain that costs are both reasonable and allowable. It is also impossible to calculate the correct number of modules without an itemized budget.
- In order to evaluate the modules for submission, we require our PI's (on the department level) to work up a full budget. Based on the actual budget, we submit a modular proposal. Also, an actual budget is used in later negotiations.
- for calculation of F&A costs; institutional policy
- Request budgets to review for reasonableness and allowability. Also needed to determine exclusions for F&A costs.
- A more detailed budget is required in order to set up the budget under the proper subcodes in the financial system.
- To insure investigators are requesting an adequate number of modules.
- Because it is a check whether they are taking out "IDC unallowable costs", such as equipment and patient care costs, when they are doing their IDC calculations
- For several reasons, including but not limited to: \* without the details, we would not know how the PI plans on expending the funds; \* without the details, we would not be in a position to ensure that s/he has approval to devote the anticipated time/effort to the grant \* to ensure that F&A is calculated correctly \* we believe that modular budgeting shifts monitoring responsibility from NIH to grantee -- we do not see how we could perform this responsibility without the details; \* school/departmental staff have continually asked us to require this of the applicants
- Because we have a salary & wage F & A rate and need a detailed budget to calculate indirect costs.
- We do not require highly detailed budgets but developing a budget can assist a faculty member in de/refining his/her scope of work as well as avoiding under or over-estimating budget needs. Additionally, when a project is funded there is often very little time prior to the submission of the required detailed budget.
- Our office does not require at time of review for modular; the School of Medicine requires a detailed budget for review of modular grants.
- To ensure that budgets are appropriately costed, to ensure that a sufficient number of modules are being requested, and to provide a major line item budget to use for expenditure to budget comparisons at the post-award stage.
- ONLY when the project is awarded; not at the proposal stage. We use the detail for grant account management and to comply with Cost Accounting Standards policy.

## **A7 Reasons the University requires a detailed budget**

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- In order to see what time and effort required of the personnel on the project, equipment and material costs, etc. If the award is made, we are required to input a detailed line item budget into the financial system
- To ensure all costs have been captured, to calculate IDC, and to enable Finance to load the budget in our computer system once an NGA has been received.
- Necessary for calculation of F&A, necessary for completion of Checklist Page, and working in some program solicitations implies that calculations should be done,
- We need to know the amount of items (equipment, rent, tuition remission, etc.)that will be excluded from the IDC base. The SOM also checks that salaries have been estimated appropriately.
- An administrative budget review is necessary in order to verify that costs comply with policies and regulations of the OMB Circulars, the sponsor, and the institution.
- To determine if salary is commensurate with effort and at the correct rate; to identify exclusions from F&A; to double check use of regulated items, e.g. animals, hazards; to confirm number of modules is sufficient to sustain project for the entire project period.
- Check indirect cost calculation based on exclusions; internal budgets needed for departments/schools; and for collaborations across several schools
- To make sure no budget items are left out of budget and also a check to make sure the PI has thought about the budget
- To assure proper budget estimating, key personnel effort estimating and financial accountability
- a) Some department administrators find the detailed budget helpful to new investigators. The process helps the PI's associate the science to reasonable costs. b) some department administrators want or need closer monitoring to adequately control spending.
- Submitting a detailed budget is the only way our Grants Accounting Office and the Research Administration Office know what dollars the PI wants in each category. We're still accountable for dollars being spent within NIH guidelines.
- Because we want to be sure the PIs have thought through the budget and included enough money. Also, if and when an award comes through, the budget is already set. PIs know, however, that there is flexibility and that they can rebudget as needed.
- So that the dept administrator can review the validity of the amount of funding being requested
- For internal accounting and compliance, for position control, and for auditing purposes

## **B4 Other reasons for implementing modular grants**

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### **B4 Other reasons for implementing modular grants**

- Significantly reduces over-reliance on the budget as a criteria for award.
- Keeps reviewers from focusing on the budget rather than the science.
- Saving time on reviewers from scrutinizing the detail budgets.
- Reduces the desire by reviewers to micromanage funding categories contained in the application
- I thought the purpose of the modular format was to relieve reviewers and help focus the peer review process on the science.
- The expanded authorities have made rebudgeting flexibility the norm. Requiring detailed budgets and budget justifications is an unnecessary administrative burden on all sides.
- Reduce reviewer's burden
- Transfer of responsibility and authority to Grantee Organizations. Although most grantee institutions continue to require detailed budget, modular grants substantially reduce the emphasis on project cost at the time of review and require less NIH staff time to check budgets in comparison with regular grants--this allows somewhat more time to scrutinize grant applications for language, policy and format compliance, etc. at deadline times. In addition, approximately 1/3 of applications are funded, narrowing the # of grants requiring detailed scrutiny.
- To remove budget details from the review process
- It facilitates more efficiency at the applicant agency.
- Supposed to streamline or simplify the process
- Reduces cost of paper, copying, etc. associated with proposal preparation.
- Streamline pre-award administration. JIT also streamlined proposal preparation and submission process.
- Saving the institutions and PI's some time in going through IRB/IACUC review processes approximately 9 months before the start of the research, leaving only three months or so before first renewal...sometimes wastes nearly a year of their "approval".
- Reduce administrative burden at NIH
- Easier for NIH
- Ease of administration for NIH.
- To allow reviewers to concentrate on the scientific aspects of the proposal rather than spend valuable time determining if the budget request is in line with the science proposed.
- I think it helps the agencies (pre-award) more than the grantees and I thought it was supposed to reduce review of budgets during scientific review.
- Focus reviewers efforts on the scientific content of the grant application

## **B4 Other reasons for implementing modular grants**

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- I feel the implementation of the modular grant process has reduced the burden on NIH administrators by not having the position of determining cost allowability in the absence of a detailed budget. However I do understand the time and effort compliance has been receiving more attention recently.
- Reduces NIH administrative burden.
- Some paperwork reduction
- Focus peer review on scientific merit of proposal.
- I would assume to streamline NIH's budgeting process...
- Decrease the administrative burden on the NIH.
- I would add that it was also meant to reduce the administrative burden on study sections as well--to not get caught up in all of the budget and other information but rather focus on the scientific merit of the application. Not sure if letter "a" above incorporates study section review under "institutional" officials
- To streamline the grant review process at the CSR?
- It was to remove the line-item budget from consideration in the peer review process; however, reviewers still make recommendations to cut budgets, and this is problematic since entire Modules of \$25K are cut, rather than smaller amounts.
- To focus the study section reviewers on the scientific merits of the proposal rather than budgetary detail.
- Reduce federal agency administrative burden
- Reduce administrative burden for federal sponsors
- To reduce NIH's administrative burden
- Easier for Federal reviewers of progress reports, and easier for federal institutes to estimate future budgetary requests
- For the NIH to be able to estimate the number of grants that each institute will be able to fund. They (NIH) knows the average number of grants that are submitted on each cycle, averaging the dollar amount to be requested helps the institute to budget more effectively and to also know if they can expect unspent dollars.
- Will facilitate electronic proposal
- To reduce the administrative burden for the National Institutes of Health.
- Make it easier for NIH to process/budget
- reduces the review criteria for the peer review committee
- Reduce budget reviews for study sections. Fixes direct cost award at level amount each year, which gives NIH more stable budgeting for future years. NIH can give more awards for smaller amounts because PI's stay below \$250k per year in order to submit modular proposals.
- To cut down on the wasting of paper on sections that can be submitted as "just-in-time". Hopefully it has eased some of the pressure placed on institutional review boards to approve protocols prior to grant application submissions.

## **B4 Other reasons for implementing modular grants**

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- Less work on the part of the agency
- to drive research administrators crazy
- To free up grants specialist time in "minor" reallocation of funds. To shift more of the burden of administration back to the university
- To reduce budget focus in the review process.
- I believe it allows the reviewers to focus more on the science rather than the cost of it. No more nit-picking on specific budget requests, i.e. that seems a little high for photocopying.
- To increase efficiency in NIH grants administration process To place emphasis on the science by the NIH panel reviewers
- Focus review on scientific merits.
- Ease the burden on the government.
- Focus the efforts of the study sections on the science, not on the budget
- It would also reduce the administrative burdens in the I/C's.
- To reduce the administrative burden on NIH's staff as well.
- 1. The modular grant application process relieves reviewers of unnecessary focus on budget issues. 2. The modular grant application process probably reduces workload of NIH grants administration staff.
- To focus the efforts of study sections on the science in a grant and away from the budget details. To shift the burden of accountability from NIH to the institutions.
- Initially, there was some suggestion that modular grants might lead to a shorter review cycle, due to easier review and administration at NIH. This has not yet happened.
- Expected efficiencies within the agency.
- NIH has implemented a very sensible flexible process, university campuses have maintained same old adherence to a detailed budget requirement.
- to make it easier on agencies awarding funds
- To reduce administrative burden for NIH staff in micromanaging awards
- Facilitate review and award administration
- To keep reviewers from nitpicking the detailed budgets so they will focus on scientific aspects of the proposal.
- reduce administrative burden on NIH grants personnel
- NOTE: I believe that the modular concept is served better in the post-award than in the application phase.
- In theory to keep study sections from becoming overly concerned with budget specifics, when in fact awards may be rebudgeted under expanded authorities
- I was under the impression that modular grants were helping NIH Grants Management deal more efficiently with the increased volume of awards.

## **B4 Other reasons for implementing modular grants**

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- Less work for the government in audits and explanations.
- Makes the process simpler for faculty who are required by their institution "to do it all" (doesn't apply to this institution)
- To focus reviewers on the scientific aspects of the proposal and not to quibble over minutiae. NIH has tremendous info about "average" grant size & percent of costs as personnel, IDC etc. This info is what should be used to assess reasonableness of budget.
- Reduce the burden on the federal government
- Reduce NIH review burden and flow down greater responsibility to institutions
- The government's ability to budget the NIH budget when the President signs it and Congress approves it. It's a clear way of earmarking exact dollars for a specific number of awards to institutions. However, as PI's salary caps go up and the cost of salaries, etc., the modular \$250 remains unchanged which ends up being a strain on the investigator's ability to do research.
- The modular grant application process could be used for all R01s and R03s regardless of direct dollars requested and be submitted through the Commons. Maintain traditional application for special programs such as Program Projects, Training Grants, etc. with the intent of submitting through the Commons.
- statistically I understand that the majority of R-type funding is around \$250K so it's a logical focus of attention
- To expedite the review process by NIH
- Reduce the administrative burden for grants management specialists at NIH! (Rebudgeting, line item NOGA's etc.)
- I thought the main reason was to save NIH and the review groups from micromanaging the research. As a former study section member for a number of years, I remember well the time wasted chipping away at the budgets.

## **E2b Raise Modular Grant Limit Beyond \$250K**

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### **E2b Raise Modular Grant Limit Beyond \$250K**

- \$300,000 would be more reasonable. Investigators limit research projects because of the modular budget cap. They believe that putting in a regular budget will put them at a disadvantage with a study section.
- Potentially the University would see an increase in applications to NIH
- \$250,000 seems to be an outdated amount in light of today's going rates of expenses and personnel.
- Inconsistency in guidelines creates confusion among investigators. If all grants below 500,000 were modular, investigators would have a clearer understanding of the process.
- This would allow projects that may have a subcontract component or a piece of equipment that for one year of support increase the direct cost budget to >\$250,000 to be submitted under the modular grant process.
- The process has greatly improved the administrative work of PIs, departments, and central administration. Given regular inflation, the \$250K of 1999 should be increased. What is wrong with going to \$500,000 if the same rules apply?
- So that equipment purchases in year one can be accounted requested.
- Salaries comprise the majority of any grant award and thus may underfund and underscore the importance of the research proposed.
- Raise to \$300,000 or a little higher to take inflation into account... this program started two years ago.
- For the initial submission, NIH should eliminate all caps. A detailed budget exceeding \$500k should be incorporated into the other JIT components. Hey if the science doesn't cut it, why waste time on a detailed budget?
- Cost of research have increased since program was established, so the basic premise of a module being worth \$250,000 needs updating.
- For the simple fact that the cost of research is rising and the environment is much more collaborative these days which requires multiple subcontracts.
- 1. The current limit does not take into consideration the rising cost of research, particularly salaries and fringe benefits. If continued the amount of the award should be tied to some inflationary index such as the Higher Education Price Index.
- In many instances it more adequately reflects the amount of funded needed to do basic research project.
- To remain consistent with the overall policy. Perhaps only detailed budgets should be provided for grants over \$500K direct costs per year, which seem to fall into a different category any way.
- because I would like it higher
- We find many projects just over the \$250K. Our faculty would benefit from a \$300 limit.
- Increase the benefits of modulares to a larger population.



## **E2b Raise Modular Grant Limit Beyond \$250K**

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- More flexibility, room for any adjustments/negotiated amounts.
- cost of research has gone up
- Allow for larger projects
- I think you need to increase the grant limit up to \$350,000 to cover any 1st year set-up costs (i.e., large equipment, start-up lab supplies, computer programming, staff recruitment costs, etc.) and subcontract costs (including F & A )for 1st and subsequent years.
- Base cost of research has increase over the years since the modular program was instituted.
- As the costs associated with doing research continue to escalate, the use of the modular grant is beginning to decline slightly with the \$250,000 cap
- Costs have increased since the modular grant process was initiated and there has not been any increase in the ceiling for modular applications. PIs are being shut out of the process due to inflationary pressures.
- \$250,000 is often insufficient especially in the out-years of a 5 year proposal - we are a soft money institution and all PI salaries must be covered by external sources. Also the inclusion of subcontract F&A makes the \$250k cap particularly unrealistic, although I understand that may change (and if so I applaud NIH's efforts in that regard!)
- Salaries in the SF Bay Area are typically much higher than in other areas of the country.
- Yes. It's proven itself at this limit, now let's increase it and see if the results are as good.
- The amount is arbitrary and, as with the salary cap, promotes mediocre science by discouraging the best scientists from proposing the best, and more expensive, science.
- I believe some projects required more than the \$250 limit, but faculty keep the budget down in order to do a modular grant.
- I would raise the limit by removing the subaward indirect costs from the calculation when applying the cap. Including subawardee indirects in the calculation when applying the cap greatly hinders inter-institutional collaboration. PIs also believe it is more economical to include other institutions under other costs as fee for service and this costs the NIH more for indirects; the prime institution takes indirect on the full fee for service amount rather than on the first \$25,000 of a sub-award. And though reporting on fee for service is greatly reduced, it can be much more labor intensive to administer.
- I believe PIs are forcing their budgets to remain within the \$250,000 when the actual cost of the project is more.
- If additional funds are available our faculty will request them.
- It would increase the number of applicants.
- It's always nice to have more money and less work!
- \$250K seems to be a reasonable limit for modular grants, but it would be preferable if subcontracted amounts were excluded from the \$250K total, at least to some cap (e.g. \$150K) to allow for more extensive use of the modular application on grants with subcontracts.
- As the cost of research increases, if the limit is not raised, either projects will need to be scaled back or mode applications will shift to Traditional presentations.

## **E2b Raise Modular Grant Limit Beyond \$250K**

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- The expenditures on all categories are quite high. The investigator is often not reflecting the complete needs of the grant in order to fit into the modular mode.
- FOR INFLATION PURPOSES, COULD GO TO 300,000
- To encourage collaborative relationship and more "Center" type awards
- Some Investigators limit requests to \$250k (to avoid detailed budgets) on projects that cost more than \$250k.
- Inflation has decreased buying power
- The limit has been \$250,000 for 5 years and do not feel that the limit should remain stagnant for such a long period of time.
- For instances where more funds are required for the SOW
- Costs of interdisciplinary research---even on R01s---is escalating. This artificial limit is constraining, and PIs are superstitious folks at heart. I have seen PIs actually argue to keep a project's costs under the modular cap but NO VALID REASON other than their belief that it will improve their chances of getting funded.
- But our institution will still require a detailed budget for internal purposes.
- I would like to see it increased to \$300,000. Pre-award workload has decreased somewhat for PI's and for both department and central administrators. Post-award these grants are significantly easier and more flexible to manage.
- to encourage collaborative research
- Further streamline application process - reduce administrative burden on PIs and local administrators
- believe principal investigators are under budgeting their projects to be within the limit for modular applications
- It is easier to work with the modular grants.
- The \$250,000 limit is several years old. Costs have increased; the cap should increase also. Additionally, Study Section members are less likely to give outstanding scores to non-modular applications.
- We do relatively few NIH proposals and therefore have to put more time/per proposal in reviewing guidelines, relearning the terrain, relearning the safety's .
- It seems interinstitutional projects that are not in a Program Project format regularly exceed the \$250,000 threshold. An increase to \$300,000 may be a better limit.
- As an institution we feel comfortable going higher, since we are directly involved w/the budgetary process w/the investigator. There are situations in which the project would benefit from an increase.
- Costs more to do research
- Many grants seem to be in the \$250,000 & \$300,000 range.

## **E2b Raise Modular Grant Limit Beyond \$250K**

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- modular applications are more easily completed and provide NIH with the necessary information needed to make a decision regarding the award - so it would be helpful to have them be used for larger funding amounts
- Adjust to \$300k to account for the increase in costs since 2001.
- I think modular grants are working well and that institutions have become more accountable for their awards. I think raising the limit to less than \$500,000 per year (all those not requiring prior approval before submitting) would be beneficial.
- It limits collaborative projects.
- Lately PI's Budgets have been slightly over the \$250K and when they hear they need a detailed budget they tend to back down.
- The nature of certain types of research are more expensive and by virtue of that fact do not allow investigators involved in those types of projects the benefit of a modular submission
- NIH requires that PI's contact them and request permission to submit if their proposal is going to exceed \$500,000 in any one year. Why limit the modular format to \$250,000 instead of \$500,000?
- This was the limit set in 1999, and costs in all areas have gone up significantly, especially for grad students and insurance benefits. So fewer people can be supported on a grant of this size. Also, extra Modules for equipment, or for subcontracts, could be outside this limit, to give relief under the cap for other categories.
- Due to inflation from when the modular started in '99, I believe it is time to raise the upper limit. Also, from Faculty comments, they believe they can be "trusted" for higher limits.
- adjust for inflation every few years
- Can't put a fixed dollar amount on fluid research projects
- Because some research projects cost more than \$250,000. When this happens, the PI must then devote significant time to justifying each and every proposed research expenditure.
- Do not see 250,000 as a meaningful line of separation.
- Given the cost of doing research, the \$250K seems low. Additionally, I do not believe there has been a "downside" to the agency so increasing would provide a much larger base of grants to work with.
- Research costs more and research supplies are devastatingly expensive in this market economy.
- Costs of biomedical research continue to escalate.
- I am reviewing more and more applications that exceed the \$250,000 but under the \$500,000 and require a detailed budget.
- Limits the type of projects which can use the modular format.
- The system seems to work well and it could provide the same advantages for more expensive projects.
- Increasing this limit by one or two modules would encompass more of the activity.

## **E2b Raise Modular Grant Limit Beyond \$250K**

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- Will help the PI to have more time to work in the proposal narrative.
- Not a lot higher, maybe \$300K. PIs are sometimes reluctant to ask for more than \$250K, even if they need it for the proposed project. There is a perception that modular grants will be more competitive.
- Having one budgeting process for a sponsor is easier.
- to provide funding for more complicated research projects and also to allow for more collaborative research projects.
- The modular grant cap of \$250,000 does not match dollar for dollar the increase of PI's salary caps, increase in wages and increase in research expenses. While the PI's salary cap increase, it decreases the cost of research expense in supplies, etc. I hear the complaint all the time from PIs.
- It would be more realistic for PIs to be more realistic in estimating their proposal budget costs
- would provide greater flexibility for projects especially those with consortium costs
- In cases where collaboration between institutions is critical to the success of the research.
- \$250k not enough funds to cover large multi-disciplinary proposals
- When subawardees are involved, just more flexibility for total direct cost of needed project costs.
- Would support a greater number of grants.
- The modular limit should be some percent about the average direct costs (in all honesty - I don't recall what the average DC is these days.. so the current cap may be appropriate).
- The \$250,000 limit is seen as a barrier to PIs who try to force some proposals under the limit as they view the modular proposal as having a better funding chance. Of course this would be the same if the limit were raised.
- The ease of use has been easily and readily accepted. PIs prefer it.
- Some grants require more than \$250,000 per year to accomplish. This amount has not been increased since 1999.
- I think it would simplify more applications and capture more grants which require collaboration with other institutions.
- If it were slightly higher, the modular process could accommodate those projects that still fall at around \$300,000 in direct costs.
- We have a lot of subcontracts. Why not make all RO1's modular and take advantage of JIT?
- Modular grants often do not reflect true costs of research because faculty try to stay below \$250k in order to maintain competitive advantage. Modular grants are not large enough to support multi-investigator or interdisciplinary proposals. F&A costs of consortium subawards go against the direct costs cap of prime awardee.
- Would make allowances for salary increases and the overall cost of scientific research.

## **E2b Raise Modular Grant Limit Beyond \$250K**

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- Over time I see more and more grants that exceed the upper limit. This is probably due to inflation. At the outset of the modular program almost all grants here were within the limit. Currently I think that about 20-25% of our applications are now exceeding the upper limit.
- Reflect the cost of research better
- Many PIs with collaborative arrangements find it constrictive that consortium total costs (direct + F&A) are part of the cap. Allowing for limits above \$250,000 for projects with consortia would help here.
- We would be able to use the modular process for projects that require a higher budget.
- We require that P.I. salary/benefits be budgeted; therefore, personnel costs are the largest component of the budget.
- Costs for everything are escalating and at some point, the \$250,000 limit will be too low for a large number of investigators.
- It has been at the same threshold since its inception while the cost of doing research has continued to increase. Most of my faculty are now questioning whether they can perform their research if limited to \$250K per year.
- The program should be expanded.
- There are many advantages to the modular grant format, and perhaps most importantly is the flexibility it allows the PI. I would love to see this advantage afforded to PIs of larger grants.
- I would increase cap to \$300K to accommodate collaborations.
- Many PI's really could use more funds. They could avoid having to seek additional funding.
- I think the modular grant is easier for preaward administrators and PIs and I don't see the risk in going higher with the limit. There's nothing magic about \$250,000.
- If higher, it would enable more indirect costs to come into the university.
- It is simpler to prepare the proposals.
- I have worked on grants with multiple subcontracts and/or equipment and it is hard to stay under \$250,000
- Yes, but primarily the total amount so that subcontract indirects do not impinge the main PI from engaging in the study. This refers to Question D3
- Because I would have less budgets to review on the proposal side
- The very nature of some research projects require more than \$250K while others do not.
- ceiling should be re-evaluated periodically.
- It may eliminate the computations on the salary cap. \$300,000 would be a nice round number.
- When estimating future costs, taking into consideration COLA and inflation, future years maybe beyond the modular limit of 250K.

## **E2C Keep modular grant limit at \$250K**

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### **E2C Keep modular grant limit at \$250K**

- Currently based on the research the University conducts the maximum modular level of \$250,000 is acceptable.
- Anyone spending a more than a quarter of a million dollars plus facilities and administration costs of the taxpayers money in a 12 month period should take a long hard detailed look at how she or he intends to spend it.
- As an institutional official, I personally do not care for modular grants. Departments need budgets for planning purposes and faculty do not like when they are asked to prepare them. Faculty do not understand and have difficulty dealing with the constant
- Project planning requires thought be given to the budget. Costs are frequently higher than estimated without a detail budget.
- I do not think that the modular process has resulted is any less work for institutions, and often is more confusing to PIs.
- The PIs still have the option of doing a larger non-modular proposal don't they?
- I think it's a good cut off. I think if researchers want larger amounts of funding, they should be prepared to justify the request in detail, as is done now.
- Most of our applications fall within this range.
- This ceiling serves its purpose, especially at a time when NIH's budget is going down rather than up.
- most research grants fall under \$250,000
- University accountants tend to be very conservative about spending money, want to control it, and this might send them screaming out the door.
- If the limit were increased, I would feel more comfortable submitting a detailed budget so that NIH would have more information in deciding if an award should be made and what administrative financial cut to make to the award.
- From my perspective, our PIs don't seem to feel constrained by the \$250,000 limit.
- A limit is necessary to ensure accountability. Grant awards greater than \$300,000 are covered by the single audit.
- This is a lot of money and XXX University is so happy when we receive awards from NIH. The grant limit of \$250,000 USD is good to us at XXX.
- Traditional application process is still available to PIs (if allowed by the program announcement)
- I would want a budget for an award in excess of 250K
- I feel that any grant over \$250,000 should be justified to a greater extent; therefore, not modular.
- Very large budgets have more potential impact on the university (increased needs for space, new personnel, etc). The university needs to know up-front what might be required should an award be made.

## **E2C Keep modular grant limit at \$250K**

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- I do not like the modular process for any amount
- Most budgets seem to fall under \$250K
- \$250k seems like a reasonable amount
- Our NIH applications (as prime) are rare, and those that do exist might not exceed 250k.
- seems a good start
- Need more detailed budget for larger amounts
- It has not decreased nor increased our proposal submissions. Lack of funding or funding cuts have driven the increased proposal submissions.
- Because as an overall budget request increases, the Accountability needs to be documented/justified.
- For single investigator, R01s I think that level is currently sufficient. But, I think it should be assessed periodically. Larger, more complex projects should require more budget scrutiny.
- It does not matter to us. We require the same amount of detail from the PI for submitting under either scenario.
- It is amazing how difficult this process is to understand for some faculty and administrators. At this time, I would like to see how overspent the grants (due to the spending at the rate of award) might be before suggesting that the limit be increase (thereby increasing the number of modular applications).
- A grant budget higher than \$250,000 typically involves more individuals and would hence be more on the level of a program grant.
- The MGA process seems to work well as it is.
- This is a fair cap.
- not necessarily - I think higher limits would keep younger investigators from being competitive.
- The average modular grant is around \$200,000 at our institution so the current amount seems to be a reasonable limit for the modular grant.
- We believe a detailed budget and budget justification should be supplied for higher dollar request.
- Because this amount is usually sufficient for the PI to conduct research
- PIs are just guessing at budgets now and they will guess even higher with an increased limit.

## **E3 Reasons for Liking Modular Grants**

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### **E3 Reasons for Liking Modular Grants**

- Simpler budget
- Simplicity and flexibility when processing/preparing/reviewing budgets.
- The budget is more flexible.
- Attempts to streamline processes.
- not having to verify detailed salary/benefit figures.
- Simplicity of the out years budget calculations.
- Greatly reduced budget justification has simplified matters for the PI and Research Administration.
- The perception of investigators that administrative burden has been reduced somewhat.
- budgets
- Modular format gives PIs more flexibility to use dollars where needed to achieve goals. Modular format allows for more flexible planning when finalizing budget for submission.
- Flexibility in budgeting
- easier for PIs to complete the application; more flexibility for PIs in making actual project spending decisions within the modular budget limits; peer review is based on scientific merit
- The JIT features. Not needing IRB & IACUC approval at the time of application
- Not having to rush presentable budget pages at the deadline date.
- simplified budget
- Not having to provide a detailed budget justification.
- I am pleased that we no longer waste hours attempting to assure that dollar figures in every cell on a multiple year budget form must add up and across to the exact dollar. While our internal budgets remain fairly detailed and accurate, we no longer hassle over small dollars. We save a good deal of time and effort in that regard.
- flexibility
- Less work for PIs
- PIs can rebudget as they deem necessary.
- Encourages reviewers to focus on science portion of proposal.
- The flexibility.
- Very streamlined! Easy to process!
- The flexibility.
- less detailed budget to complete for NIH - less detailed monitoring of awarded budget needed



## **E3 Reasons for Liking Modular Grants**

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- I especially like the fact that it saves time at the end of the proposal-development process, when time is usually of the essence. I also like that the PI has more flexibility once the award is made. With new information from the time the proposal was submitted to the time the award was made, the PI is able to make a few changes in budget allocations without too much fuss. This is a wonderful asset.
- I do think it is simpler and easier for the PI.
- The preaward budgeting process is much simpler and does not lock the PI into deciding so many details at the on-set.
- Absence of a required detailed budget justification; PIs largely do not do that well.
- 1. Less work for PIs and Research Administrators. 2. Just-in-time process
- Budget flexibility
- No other support pages
- We have designed a special budget template for Modular grants, so our PIs are submitting similar budgets with the same rates, as opposed to different formats or the wrong rates. The budget justification is easy to prepare. Modular grants allow for rebudgeting, just as for regular grants under Expanded authorities.
- PI does not seem as "stressed" about preparing a budget -- he perceives that the process is easier. Administrators can review budgets quickly and easily.
- simplifies the work
- Obviously, it does take a lot of the burden off the PI. While we still discuss and develop a detailed budget with the PI, we still realize there is much more flexibility at time of award ... research doesn't always go as planned and the modular mechanisms is much more accommodating to that.
- A one-page budget.
- Detail budget not being required at proposal level
- When the sponsored projects office is required to review many awards and meet the deadline, a modular format allows the process to proceed at a faster pace.
- The PIs do not need to spend time on detailed budget justifications.
- Not having to prepare a detailed budget or submitting other support.
- While at another institution I liked the modular grant application from the reviewer aspect as it was much simpler to review. (We did not require internal budgets). At my current institution that aspect doesn't apply now. I could review a modular grant in 15 minutes a non-modular took 30 to an hour depending on the complexity of the budget.
- Takes less time to complete the forms. There's no budget adjustments to the forms as long as they stay within the modules.
- Less paper work to present up front, may simplify transition to electronic grant submission.
- Not having to do a detailed budget at the proposal stage saves time because many proposals are not funded.

## **E3 Reasons for Liking Modular Grants**

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- The PI is able to focus more on the research design and less on budget development
- The simplicity of the initial submission.
- modules, and easy of in budget justification.
- Preparation of budget forms is simpler.
- the p.i. doesn't have to worry so much about adding up every single budget item
- Overall, it is better for our PI's.
- The reduction in the amount of support documentation required
- Study sections may involve themselves less with the budgetary aspects of a proposal than they once did.
- Detailed budget pages do not have to be submitted.
- The Modular budget page.
- Easy to complete budget
- The brevity of the budget section compared to a standard application.
- Not having to check detailed salary/fringe calculations on faculty AY/summer salary
- Streamlined budget forms take less time to check/crosscheck with internal paperwork.
- Less budgetary review time and no budgets each year.
- Less weight on budget as reflection of plan.
- The final application preparation is somewhat less burdensome.
- Very easy to review grant prior to submission. It also reflects the uncertain nature of research expenses. More detailed budgets are hard to define before research begins.
- The simple instructions and straight forward budgets.
- The process is much more streamlined for the P.I.
- Simplicity and concentration on science over costs.
- I like that the budget takes much less time to present (no long form to complete and make mistakes on).
- Lack of detailed budget
- While we still require detailed budgets internally, they don't have to as detailed (or justified!) as a traditional NIH budget and that does make the investigators happy. Also, making rebudgeting questions go away is a big plus. Anything that makes Grants Management's life easier is good for us.
- Flexibility in budgeting, less budget justification, no other support required at the time of application.
- Don't have to spell out and justify each and every line item in detail.
- PIs have more budgetary flexibility

## **E3 Reasons for Liking Modular Grants**

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- It should give more flexibility to researchers and universities, and save time for researchers and preaward administration. But we need to train postaward accountants and external auditors to live with flexibility. Can that happen?????
- Simplifies paper and reporting to NIH
- Faster review of proposals Just-in-time items
- I agree with the philosophy behind modular grants.
- Less work for all involved in the preaward phase.
- SNAP! Expanded Authorities.
- 1. Less information to review/verify 2. Less expense associated with proposal preparation (paper cost, time/effort spent copying, fixing errors, replacing pages)
- simplicity
- Less paperwork up front.
- Streamlined aspect easier post award
- I like the ease of the process from the PI's perspective.
- Simplified budget and modular nature of funding requests. Emphasis on reducing administrative burden for faculty and their support staff. Emphasis on basic assistance. Ease of post-award administration (no need to appropriate a detailed budget).
- Reduces the opportunity for "nickel and dime negotiation" and the problem of checking things to the dollar when research doesn't work that way. It recognizes that one cannot have precise costs for these types of projects.
- The theory
- I'm an administrator, I review grants internally so not having a detailed budget obviously leaves room for less error on the part of the faculty/staff who has prepared the budget.
- I like the idea that reviewers focus on the scientific content rather than budget analysis.
- the flexibility it gives the PI
- It's somewhat easier to fill out only the modular forms instead of the budget detail forms.
- Easier to do last minute submissions without having to worry about small mathematical and typo errors.
- The rounding to the nearest \$25,000, which allows for greater flexibility in spending. Exact dollar amounts are difficult to predict 6-12 months in advance.
- There does seem to be slightly less administrative burden in the submission of documents in the proposal process.
- Less forms to fill in. Slightly reduces pre-award administrative time.
- Not having to worry about all the details for the application.
- Flexibility is important for PIs. It allows the data to dictate the direction of the research rather than the dollars.

## **E3 Reasons for Liking Modular Grants**

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- Budget page easier to deal with...the 398 form is not easy to fill out on the computer
- The ease in constructing a budget.
- The application review is much easier and more efficient.
- Easier pre-submission review
- The process has streamlined the application process considerably.
- time in prep of paperwork
- We like that there is not a need for detailed budget justification because it is less for us to scrutinize. It is also less work from the investigators standpoint.
- Saving time and effort for everybody (P.I., institute and NIH), more budget flexibility, easy to control and manage the grant.
- Less paperwork for PI at submission; budgetary flexibility appreciated by PI.
- Increased post award flexibility. Research projects frequently have unexpected demands, and this permits the investigator to respond to these more readily. Also, despite the fact that similar preparation goes into a modular vs. non modular application, the modular application is much easier to review for important issues, rather than focusing on details of the budget.
- Less forms to fill out (i.e. budget forms)
- It does somewhat cut down on the Institutions review mechanism prior to the application being signed.
- Other than fewer entries required on PHS form sets, the actual construction of the information to be entered requires about the same effort.
- Limits on budgets requested in modules and the condensed justification requirement is easier to review and critique. The Other Support added to the Biosketch for ongoing and completed research has made the process easier, however with the compliance requirements on monitoring 100% total effort, the omission of this may require more work on our part.
- Reduction in paperwork and administrative burden until paperwork is necessary.
- Less paper work, not a whole lot but some.
- It decreases the amount of time spent on budgeting.
- I like the idea of PI's having the ability to devote more time to the scientific part of the proposed project.
- flexibility in post award monitoring
- Clear, clean budget pages that are simple to check in our office. Elimination of pre-approval for rebudgeting over 25%.
- less administrative paperwork to review
- Don't have to submit a detailed budget, so that if there are significant changes in salaries or other costs between the creation of the proposal and the awarding of the grant, it can usually be accommodated within the modular cap.

## **E3 Reasons for Liking Modular Grants**

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- Fewer forms, less time on budget preparation
- The streamlined budget justification process and the fact that Other Support pages are not required at the time of submission.
- Simpler budget preparation process
- fewer form pages to review
- Focus on the overall cost of the research rather than on the detail. Focus on commitment of effort/FTE rather than the exact salary and fringe dollars requested for personnel. Postaward SNAP submissions and flexibility in budget management over the life of the project.
- Simplicity of the form
- I like the just-in-time part and the fact that detailed budgets don't have to be submitted to the agency.
- I like the attempt at streamlining the process.
- No line item budget detail, saves some time during deadlines
- EASE OF PROCESSING PROPOSALS AND POST AWARD MANAGEMENT
- I'm not sure I want to choose between like and dislike - we just do it !
- If time is tight, we can agree internally to work with the budget developed by a PI, and fine tune it later, if an award is made.
- Reviewers focus on the soundness of the proposed research rather than the budget and regulatory compliances.
- That it assists faculty to concentrate on the technical or scientific aspects of their work.
- Budgets are more flexible.
- Not having to verify budget details, nor math accuracy
- Not having to itemize the supply and other costs and not having to submit Other Support at the time of application.
- There is less paperwork.
- Not having to work in the NIH budget form. Being able to be somewhat less detailed on budget lines
- At proposal submission time it is effective in reducing time spent on review resulting in quicker submission. This is very valuable since not all that are submitted ever reach the award stage. Also, the flexibility in moving the funds around when needed without having to seek approval is greatly appreciated by the accountants.
- Budget reviews are simplified, budget justifications more straightforward.
- From an administration point of view, it has made no difference to my office. JIT information is another story.
- This is a very smart way of doing things on all sides (the PI, their assistants, the institution, & NIH). I am very happy the modular grant application process is working well.

## **E3 Reasons for Liking Modular Grants**

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- Easy to review modular budget and justification for central office staff
- Forms easy to fill out, no detailed budget forms to complete, reduced up-front workload, it streamlines the budget process for the PI...he does not have to spend a lot of time writing up a major justification
- The simplicity of the budget justification
- The greatest achievement in reducing institutional burden and allowing PIs to focus on science is not the advent of the modular application but rather the awarding of expanded authorities and the use of SNAP.
- Once internal budget is approved, less time is required by different administrative offices to review and approve grant.
- less details for the PIs to worry about at application submission time
- Simplifies and streamlines the application process.
- The weighted average approach to submitting a budget request and the reduced budget justification.
- Simplicity in the pre-award stage.
- No requirement for Other Support at time of submission (is usually outdated by the time of potential award anyway). Rebudgeting flexibility is also a plus.
- The simplified budget process and the just-in-time requirement for other support, IRB approval and animal subjects approval.
- Reasonable cost control of the project based on program needs.
- Since rebudgeting is allowed, detailed budgets seemed to be a waste of faculty time. It is a much easier process for faculty to put together and takes less time to fill out an application.
- Not having to review as many detailed budgets.
- It takes less time to put it together
- The submission of additional paper work such as other support has made our job easier.
- The stream-lined format.
- Not reviewing a detail budget and justification.
- Simplified budget justification, less documentation involved, streamlined form processing, easier to modify information.
- The ease of administering the actual award and preparing them with the faculty. Even though we still need a detailed budget from them, we do not need to have detailed justifications.
- Not requiring an "Other Support" page. More flexibility in budgeting for the PIs, but we still require a detailed budget.
- Not having to fill out the PHS 398 detailed budget forms.
- Review for institutional approval is much easier and faster.
- Reduces administrative burden

## **E3 Reasons for Liking Modular Grants**

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- Just-in-time information
- Flexibility, simplified budget form
- no detailed budget needs to be provided up front.
- less detail required for budget in application
- Simply the relief from dealing with multiple budget aspects when more time can be spent on the real focus of the application, the scientific thrust.
- Not having to do the detailed budget
- makes PI's focus on the dominant cost category - effort/salary. and reflect on who is doing what when. I think this is a good thing. I also think it focuses the review on those very important elements.. with the biosketch info, this gives good sense of qualifications, judgment and feasibility off work team to produce
- I like not having to complete the detailed budget with the justification.
- It is systematic and consistent. Compared with other application vehicles, it allows few exceptions, which obfuscate the application process both on the preparation end as well as on the evaluation end.
- It's simplicity. The PIs love the process. They set up an in-house budget and we check it for them as a courtesy. Because a full budget isn't required by NIH, the PIs can concentrate more on the research components of the grant and have added flexibility with regard to the financial components of the grant.
- Shorter applications. Less budget detail required. No listing of current support.
- Easy to complete NIH forms
- Less forms to complete. Therefore, more proposals can be submitted.
- Having the PI write a less stressful budget justification. It doesn't require as much information.
- I liked the fact that the process brought about the overall "disregard" by NIH concerning rebudgeting approval.
- It is easier to review
- Don't need detail budget. Don't need categorical explanation on continuation applications
- No budget requirements Other support and supplementary documents required only when needed (just in time)

## **E4 Reasons for Disliking Modular Grants**

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### **E4 Reasons for Disliking Modular Grants**

- Providing JIT Information Later Harder to manage the project later without a lot of detail in the original application.
- The fact that, as an institution, we must still prepare a detailed budget to accurately reflect indirect costs.
- We do not require a detailed budget for routing proposals. When PIs do not provide a detailed budget, we have a problem calculating F&A costs and determining the feasibility of executing the project and the allowability of direct costs.
- Internal institutional budgets must be detailed, and must somehow be made to match a modular amount. Level of internal review of a modular grant proposal is the same as for any other proposal; there is no reduction in the amount of time or effort that is spent preparing a modular proposal. The whole modular concept seems to confuse PIs.
- Preparation of detailed budgets with grant application is now an institutional policy, requiring more of an administrative role to get the same information.
- Modular budgets and justifications Problem with F&A checklist PIs think that they can spend the funds anyway they chose.
- Convincing the PI that while NIH does not require a detailed budget the institution does. I feel it's important to always go through the budgeting process. Projects usually cost much more than a PI thinks because of fringe benefits, etc.
- Indirect costs are calculated on the basis of the module(s) less actual exclusions; many people have trouble with this concept. The JIT other support follow-up still takes more time than anything else!
- The PI still needs to develop a full budget in order to determine how many modules will be required. While investigators were led to believe that funding would be in modules administrative cuts are taken which leave investigators with less funding that necessary for completion of the work. Some institutes ask for a detailed budget at JIT time even for modular grants.
- That local accounting rules demand detailed budgets. See my answer above--we need to train and introduce accounting rules so that this isn't needed. I would be interested in knowing how many univ. still require detailed budgets. When modular budgets first started, almost all universities did require detailed budgets for modular grants.
- I think the modular grant process is great, but we are sometimes asked by the technical person to provide a detailed budget before an award will be issued. I've never understood this since I thought the modular budget was supposed to make this unnecessary.
- NIH end - none. On Campus - implementation remains like detailed budgets
- Funding limits and including indirects of other institutions
- The problem of investigators whose project requires a little more funds that the \$250,000, but do not want to bother to make up a budget.
- the perception that PIs are somehow less responsible for the appropriate budgetary oversight of their projects



## **E4 Reasons for Disliking Modular Grants**

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- PIs sometimes think they don't need to do as much advance planning, and that creates problems later.
- I feel better justifying all costs.
- Faculty are sometimes confused if they've applied for non-modular grants in the past. It's difficult to get them to understand the difference.
- The NIH hype of this policy as allowing the investigators to focus solely on the science runs contrary to our institution's commitment to encourage investigators to practice appropriate fiscal oversight on their research. The 1,000 rounding on the subcontracts causes a lot of confusion.
- I dislike the "hybrid" modular grant applications I see and review that come from faculty that are uncomfortable not submitting more detail.
- just in time requests often arrive at a grant deadline time. NIH grant specialists make errors in calculating indirects on modulars.
- If you accidentally submit a detailed budget, then you are penalized.
- I can't think of anything right now, although I look forward to electronic processing.
- Coaching PIs throughout the process.
- See my response under E2. In addition, our office has had to develop a questionnaire to substitute for the budget. The questionnaire addresses specific budget concerns such as the NIH salary cap, unallowable items, cross-school approvals, etc.
- I don't like how consortiums are accounted for. What is up with identifying subx to the nearest thousandth? Why identify any costs associated with the subs. Heck, the onus is already placed on the awardee. identifiedaccounted
- It puts the department or school in the awkward position of requesting more information than the agency to stay in compliance with regulations and insure that projects are adequately budgeted.
- The low modular dollar value. Indirect costs for subcontractors should be allowed to recoup their indirect costs separately from the direct costs of the proposing organization. This will reflect the true direct costs of the research effort.
- not having a required budget makes compliance with CAS difficult and often causes A-133 audit difficulties
- The perception by the PIs that the central Research Office is making things more complicated than they need to be by requiring budget detail. It seems to me that we have had to provide additional detail at time of award as far as F&A calculations are concerned, especially when subcontracts are involved.
- It's a challenge to my honesty! I exclude equipment from F&A but always wonder whether other institutions are doing the same. If you don't exclude equipment you could get more F&A some of which could then be rebudgeted into direct costs (which the PIs would love!).
- PI's are reluctant to use the traditional application process in fear that their request is too high and therefore will not be considered for funding.

## **E4 Reasons for Disliking Modular Grants**

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- PIs don't want to submit internal detailed budgets that are needed by this office.
- The requirement, whether modular or non-modular, to include a percentage of academic year effort for the pi, especially when no funding is requested for this effort. It's a real negative in the system and imposes an undue burden without any additional benefit.
- The faculty don't always remember the different requirements for modular and therefore it requires more clarification.
- At the time of proposal submission, PIs are bothered by providing information about IDC exclusions - which we need to assure they are calculated appropriately. At the time of Award it slows down the process to have to get the account breakdown information from the PIs - Accounts are inevitably broken down by subaccounts for accounting purposes. The Modular concept does not translate into the accounting realm. PIs get upset at still having to give totals for various spending categories and having to wait for the award's to be set up.
- Trying to get the breakdown of personnel salary from faculty, when they know it is not required by NIH.
- The need to explain to faculty why it is necessary that they submit a detailed budget to our office when it is not required prior to submission to the NIH. We request the detailed budget so that we can determine the F&A because we are salary and wage base.
- Ensuring we have a compliant budget--allowable, allocable, reasonable, consistent.
- The Just-in-Time process where something is needed immediately in order to award. Fitting the actual budget to the modular amounts.
- our contract accounting office still operates in the dark ages. flexibility and supporting research within the reg's & guidelines is not what they are about; rather, at all costs, avoid even minor audit findings. one thing you might clarify is when it is appropriate to document "unusual" expenses in the modular budget pages (i.e., typically those in F&A).. we do lots of survey/training stuff and have been recommending our PIs add a blurbette to that effect to avoid problems with contract accounting down the line.
- the cap
- Info not required at the time of app is needed immediately before funding and when a lot of these requests for info come in a bottle neck is created because we have to get info from different sources so it doesn't happen instantaneously.
- The "black box" aspect of a modular budget--that's why we require detailed budgets for internal use.
- Saves time for NIH staff, but little savings to institutional or departmental research administration.
- No increase allowance for each project year.
- Because the modular process is limited to NIH and capped - i.e., not universal with all federal agencies - it is difficult for PIs and departments to drop their reliance on detailed budgets. This limits the streamlining benefits for the PI and department admin.
- PI's still believe they must provide detail in the narrative "because the reviewers want to see it".

## **E4 Reasons for Disliking Modular Grants**

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- Inclusion of subcontract F&A; absence of inflationary increases - particularly problematic with regard to projecting salary requirements.
- Having a budget reduced by one module as a result of the study section review and then incurring an across-the-board I/C cut is leaving investigators with much less money than is needed for their project.
- The limit of \$250,000 in modules and the lack of escalation in modules. Costs always go up over time and the requirement of requesting the same number of modules does not address the reality of the situation.
- That the limit isn't higher than \$250,000.
- what NIH has done is taken the burden off themselves to look at budgets and given it to the institutions, making the institutions look like they want more than the government. In reality, I was at a meeting not too long ago where an NIH staffer stated that despite the fact that modulars didn't require budgets, institutions should have budgets as a way of assuring correct spending.
- The nicest part of the modular grant application process is not having to write out the budget justification details. However, the consequence of this is that it does not encourage specific planning on the part of the investigators. Investigators can be extremely vague in their estimates and consequently, they receive awards that may be greatly out of line with their needs. Planning is not the best timepoint at which to relax their attention.
- The modular form creates an additional internal step in the application process
- The perception that the modular grant process has significantly reduced the time and effort required of the pre-award staff to complete an application.
- trying to fit needed equipment into a \$25,000 module. The cost of equipment should be specifically omitted from the module process.
- 1. PIs struggle to figure out the # of modules to request 2. PIs believe that there are increasing expectations by study sections for budget justification beyond guidelines
- TDC cap
- The biosketch was confusing at first but I think that everyone is used to it now.
- No escalation, same # of modules every year, fact that PIs sometimes don't want to give us detailed budgets that we need.
- It really isn't achieving its purpose on the pre-award side, as most institutions are requiring full budgets. However, the flexibility on the post-award side is terrific.
- Internal (deans') questions on budget detail, convincing PIs they don't need to provide detail.
- Since our institution still requires a detailed budget, then we catch flak from the PI's because the NIH does not require the same level of detail and it makes us look like the "bad" guys.
- We still need to develop internal budgets to be sure the PI has included ALL costs. PI's often forget to include animal per diems, travel, and other expenses when they develop modules, so we find that we just have to go through an internal review anyhow.

## **E4 Reasons for Disliking Modular Grants**

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- Not being able to determine how/where the IC thinks the budget/project should be revised whenever modules are cut from the number of modules requested.
- That it really makes no difference to our internal procedures.
- PIs feel that sponsored research offices are being burdensome by asking for a detailed budget when it is not a NIH requirement.
- FIGURING F&A COSTS
- I think the guidelines are confusing, the limits too low, and the funding increments unrealistic.
- From the preaward standpoint it really did not change the need for a budget and investigators may resent the need for detail that is still imposed. From the post award standpoint, it is bit more challenging to ensure that expenditures occur in a timely, uniform manner.
- What to do if PA says to use the modular grant guidelines and also states that you do not have to include subk F&A in your direct cost limitations but you must still request the subk F&A in direct cost amounts. OK to increase this module even if at the \$250k limit? Don't think a detail budget should be required.
- Instructions for PIs could be clearer, especially relating to subcontract IDC and escalations for future years.
- The inclusion of the subs F&A in the direct cost limit. Overall inability to file applications electronically.
- Uniqueness of the modular process to other budget processes. Also, our institution requires detailed budgets from PIs and the often question why since NIH does not require them; this is confusing for PIs.
- Auditors still expect us to have a detailed budget and follow it in order to comply with the CAS standards included in A-21, but PIs resist accountability since they say NIH doesn't care how they spend the money. The Research Office is seen by PIs as being too demanding and inflexible and By auditors as being too accommodating.
- I do think you should probably explain the exemptions on the checklist somewhere so that it is obvious where the indirect costs came from
- PIs can prepare a "loose" budget that may or may not reflect the real cost of conducting the research.
- Just In Time process needs to be refined and better coordinated at NIH.
- No detail budgets
- The \$250k cap.
- Focus for improving and simplifying processes has not concentrated on the institutions receiving the awards
- You don't ask for a detailed budget, but then ask to calculate Indirect Costs on the Checklist page... How can you do this without a detailed budget? It's a personal pet peeve.

## **E4 Reasons for Disliking Modular Grants**

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- PIs do not understand that they are spending tax payers dollars and do not pay attention to producing a well thought-out budget of needs and do not think through their grants and experimental procedures as much as they should. The ability to be "sloppy" with the budget has lead to "sloppiness" in the scientific body of the grant. Its an attitudinal thing.
- The PHS 398 instructions should come right out and say that an administrative (internal) budget may be required by the institution at the proposal stage, in order for the Sponsored Programs Office to verify the proposed costs comply with institution policies and OMB Circulars.
- The perception of investigators that the university requires needless administration because we still require a detailed budget for funded proposals. Good certainly outweighs this internal problem.
- Modular budgets place more responsibility for documentation and accountability on Institutions. More not less administrative burden. The "Research Support" section is continually confused with "other support", a change to the name of the section to read "Relevant Research".
- Biosketch, Just-in-time and SNAP questions
- Not having a detailed budget to work from.
- The current limit on the amount allowed to request of 250K/year.
- The need to do Other Support twice. Current support of the PI & key personnel should have no influence on whether or not to fund the research.
- If voluntary cost sharing is involved it is a more difficult to spot than it was with the full budget where one could immediately see the devoted effort compared to salary, etc. Some compromise needs to be made concerning cost share.
- Having to explain to a PI that we still need to do a detailed budget, even if one is not required by NIH.
- Greater administrative and fiscal compliance burden on the institution. Modular process does not require detailed budget, institution does; this creates tension between institution and PI.
- The backend work once the award is made is quite a bit more complicated. With a nonmodular grant, the PI's don't have any misconceptions as to how they must monitor the financial portion of their award.
- PI's thinking that a modular grant can be thrown together at the last minute. It can't, but they think it's less time consuming from an administration point of view. It's not.
- It is difficult to find specific info on how to calculate the indirect costs on the Checklist. I have had to use the grants web sites of universities to get practical info on this.
- The modular process, while the review at the preaward stage is simpler, it has, as a direct result of no review by NIH, increased our burden because the entire determination of allowability falls on the university administrators at the post award stage (i.e. - our Pre-award office requests and reviews budgets then sends to post award office for a further review and account set up).

## **E4 Reasons for Disliking Modular Grants**

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- Puts pressure on post-award administration to ensure that there are sufficient funds in the uninflated outyears. Inclusion of subcontractor F&A in the modules. No provision for inflation  
Need to do a regular budget anyway
- 1. We still need a detail budget because our research foundation does not understand modular budgets. 2. It encourages PIs to wait until the last minute to bring things in for review.
- We still require from our investigators a detailed budget. Some investigators are quick to point out that the NIH does not require a detailed budget. However, like a previous answer we want to verify that the budget is reasonable and will eventually need it if funded. Having the budget in advance of the award makes it easier to open the project for the investigators to begin to work on the project.
- We set up a detailed budget in our financial system, even though the award is made as total direct, plus indirect or F&A, amounts, which can require additional time to get a revised budget from the PI based on a reduced award. The peer review process allows for budget cut recommendations by reviewers, as well as NIH program staff, and there is no feedback on why the cuts were made, whereas a detailed budget and award would make this more clear. Extra one-time costs must come out of the annual Modules, and when the budget is at \$250K per annum, this does not allow for steady support of personnel across all years, since the year with extra costs is absorbing those one-time costs. Subcontracts should be outside, and on top of, the annual Modules for direct costs of the prime grantee; this would allow for NIH to see what the prime institution is budgeting over the project period, separate from the subcontractors. Receiving the same direct costs every year does not reflect real escalating costs over time. A 5-year project will have lower costs in year 1, which means we have to carryover large unspent balances to cover higher costs later on. NIH has given notice that they understand this, but how do we separate out what is year 1 funding not spent and future year funding not spent, in our carryover statement in annual progress reports? And how do the PIs make sure they haven't spent too much in the beginning of the project so they aren't short at the end?
- The PIs don't seem to evaluate the anticipated costs as closely as they would otherwise.
- Discussions between PI and administrators as to what is the real cost
- It seems to me that OMB Circular A-21, CASB requirements still hold institutions accountable for estimating cost of sponsored projects in a consistent manner but the Modular grant program forces institutions to treat budget development differently for these grants applications.
- forces us to fit research/budget into groupings of \$25,000
- PIs must create detailed budgets to determine number of modules to request - this isn't a complaint, just an observation. Sometimes difficult to find F&A exclusions.
- that no detailed or limited budget is required. It forced us to create a "modular workbook" that we use to see if an investigator has chosen the right modules. So in some respects it has cut down our review time, but often we can tell just by reading a justification that they have not requested enough or went over by using our workbook--so in some respects it might have saved time to have the budget included in the first place.
- Budgeting for a subcontract.
- convincing the PI I still need a budget...

## **E4 Reasons for Disliking Modular Grants**

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- no area to explain exceptions for indirect cost calculations. Grants Mgt officer usually calls and asks for an explanation.
- For internal grant management purposes, a detailed budget is easier to setup because the spending categories are kept as funded by the agency. However once a modular grant award is setup according to internal spending categories, the same ease exists.
- The level modules year over year are not realistic. Costs of personnel and supplies increase in an inflationary environment.
- PIs are still confused as to what expenses require a justification.
- It duplicates work. This institution requires a complete budget, which this office assists the PI in doing, and once that is approved then we assist the PI in doing the modular budget
- Having to decide which modular amount the budget must be when the detail budget falls in between modules.
- We need budgets at our institution. It would be easier if they were required for these proposals also
- Grant limit amounts.
- Including subawardee's F&A in the module has created some problems. We need certain information to calculate the F&A; PIs sometimes don't understand this because it is not part of the guidelines.
- Limitation of funds
- Having to complete detailed budgets, other support, etc. institutionally, which does not reduce our administrative paperwork.
- The inability to provide more justification for some budgetary aspects. I think that reviewers may have some doubts that are created by not enough resource information.
- Because of the lack of an escalation feature, the budget rarely reflects a realistic spending pattern and the award never matches the year-to-year budget. This confuses our accounting folks. The \$250,000 ceiling is now too low.
- The institution still needs detailed budgets, so we are cast in a bad light; our need for a detailed budget initially viewed as bureaucratic obstacle.
- I think budgeted categories might be a thought
- The mixed message that NIH and the institutions must give. NIH requires little detail, but yet the institution needs more detail.
- The process did NOT improve or simplify either pre-award or post-award. The application process has increased, as an internal budget is required (by this institution) before completing the modular budget page. Many faculty want to list all of their costs to help justify their request. If that is done in any modified format - what would be the purpose of submitting in a modular grant. And, as was stated previously, the financial outcome should be assessed.
- Inclusion of F&A for subawards in total cap.
- Unless it is necessary for scientific review, I would like to switch human, animal and literature cited to just-in-time as needed.

## **E4 Reasons for Disliking Modular Grants**

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- Expected equipment purchases exempt from indirect are not always clear enough to calculate the indirect for the checklist.
- Investigators continue to press for longer budget explanations, convinced that reviewers need to have the information.
- Non-routine salary escalation is a problem for salary and wage based institutions, who need to be able to estimate indirect costs.
- Tends to make the institution the "bad guy" when we have to ask for info from PI's to correctly calculate the base for F&A.
- Because of our accounting system, we still need a budget (at least by cost category) to load to the grant account. The modular application process doesn't recognize this.
- Obtaining institutional budget information from the PI is sometimes harder since they perceive it as not being required by the NIH.
- Need more information about salary
- I dislike the limit, think it should be more widely used. I wish that subaward F&A costs were excluded from the limit.
- The fact that a detailed budget is not required by NIH, but I need to have the applicant prepare one anyway.
- You have to remember to remove the equipment, cost of subcontracts when doing the computation of F&A. For internal purposes and to do the calculations properly, you still need a budget.
- Faculty don't understand that in order to actually know if they will have enough money to conduct their research, they still need to do a detailed budget and then figure the modules from that point. Otherwise they will have no idea of if they can support the research they are proposing for a particular dollar amount. It is also really difficult to educate faculty that they need to write a less detailed justification. They tend to want to make all of their grad students "key personnel" and describe them in the narrative.
- Nothing strongly enough to mention
- Limit of direct cost for some projects
- Since the PI does not have to justify equipment unless the modules are different. It is hard to apply the correct F&A rate. The PIs feel that justification of equipment is important if the equipment is necessary because if the budget is cut they may not be able to absorb the cost of the equipment in the reduced budget
- Explaining the calculation of F&A costs!
- Just in time requests come at points where other deadlines interfere with response to NIH for JIT info.
- The fact that we still have to have a detailed budget for our office.



## **F6 Reasons for Liking Just-In-Time**

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### **F6 Reasons for Liking Just-In-Time**

- Decreases burden on IRB and IACUC.
- For the simple fact that is JIT
- There is a lot less paperwork flowing through this office.
- Irb and/or IACUC review and approval is not required unless the grant is likely to be awarded.
- The fact that specific requirements do not have to be fulfilled at the time the proposal is sent in. Before submission, the focus should be on preparing the best scientific proposal possible.
- I like the fact that some items are not required at time of submission. This is what actually speeds up the process. I like when we can submit electronically.
- It allows greater flexibility for the PI if he/she will receive an award.
- Not having to have all the paperwork for the deadline date.
- Current and Pending support is more accurate closer to award but I am not sure what the value is of these data after review.
- Upfront savings of time for the PIs, institutions and paper reduction.
- Providing compliance (HSRB, IACUC) approval information later as well as other support. If a grant is not funded, this information is never sought.
- Gives investigators time to get projects reviewed/revise thru HSIRB or IACUC so certification can go when requested, also does not require a second review before the project begins. Other support is prepared once and is accurate when project starts Clues central research office into pending NIH awards
- FOR THE MOST PART, we don't have to check OS, HS & animal approvals unless the grant will be funded.
- It's a benefit to not do all the "administrivia" for proposals that don't make the funding line.
- Fewer submissions of material
- Facilitates proposal submission and meeting application deadlines.
- There is no need to go through IACUC and IRB approval prior to submission. Since Other Support pages are not submitted with the proposal, there is no need for these documents to be created and updated several times prior to award.
- It saves time for the researcher.
- Checking other support is EXTREMELY time-consuming. We prefer to do it only when necessary.
- Not having to provide information for projects that probably will not be funded.
- JIT allows PI's to submit needed documents only when necessary

## **F6 Reasons for Liking Just-In-Time**

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- Prevents last minute rush to ensure compliances are in place before submission - gives us time to do things correctly and accurately. Additionally, requests for Other Support at time of award make much more sense than at time of application submission, particularly if effort must be adjusted.
- 1. Being able to submit the JIT info via the Commons. 2. Not having to submit this information with the original application.
- Don't have to collect materials at proposal submission when struggling to meet deadline. Only have to provide information for awards not for all proposals.
- Some documents are not required at submission
- not having to supply the IRB, IACUC, or other support at the time of submission
- If I have a PI who does not consider the time element of putting a grant together for submission, then it's helpful that I don't have to submit these documents. I would, however, prefer to have done the entire grant at one sitting.
- The fact that you do not have to submit details at the time of the proposal.
- Administrative aspects..
- Not having to supply "Other Support" page at application stage.
- The fundamental J-I-T process does make things a little easier for this office.
- less work for applications that are NOT likely to be funded
- We like not having to worry about this information at the time of submission -- that is excellent!
- In general JIT is GREAT. However, the expected turnaround time is totally crazy and in my opinion, unjustified!
- If it reduces administrative burden for the PI it is a good thing.
- We like that our IACUC and IRB do not have to review grants that will not be funded!
- not having to ask everyone for things that are not needed
- Investigators have more flexibility to submit proposals when IRB approval is pending.
- It saves everybody's time at the proposal writing stage. Also, it was silly doing C&P's that would be out of date by the time the grant started.
- Not sure how to answer this question. The + and - of the Just in time process has to be judged on a case by case basis.
- Elimination of mountains of paper processing at the crunch of application deadlines
- Not required to prepare the items until possible funding of project.
- As stated previously, the sponsored programs office burden is diminished because we only process the just in time info for grants that have a possible chance of award.
- Simplify the process and save everybody's time.
- It's very sensible, and in particular reduces the institutional burden on our compliance committees--IRB and IACUC in particular

## **F6 Reasons for Liking Just-In-Time**

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- It is less burden on the PIs at the proposal-writing stage.
- reduces number of protocol reviews required
- The elimination of paperwork.
- We use this notification as a point in which the file can be reviewed for documentation needed for potential award and account setup
- As an administrator/reviewer of grants, the proposals are not held up waiting for IRB approval, etc., they can continue to move forward in the processes internally so that submission is on time and not at the 11th hour.
- The concept is brilliant. Since approximately 2/3 of new applications are not funded, it allows investigators to pursue their research and waste time on protocol preparation, and in some cases detailed budgets. This also eliminates un-necessary administrative preparation and review time by IRBs and IACUCs.
- Enables investigators to focus on science of application, rather than being diverted to get authorizations (eg. IRB, or ACC) approved at the same time.
- Reduced burden of review of proposals for compliance approvals and providing paperwork that is unnecessary unless recommended for funding
- Decreased workload on IRB/IACUC. Decreased stress to try to get a meeting schedule for review of a protocol that might not get funded rather than once the chances are good.
- The other support, IRB and IACUC requirements. If a application is not chosen for funding very earlier in the process, none if this work is ever needed to be done!
- The provision of "Other Support" only for those proposals that are to be funded and the ability to follow-up on "needed" IRB and IACUC approvals.
- It decreases the burden on the pre-award side since we don't have to process paperwork for proposals that are not going to be funded.
- Not having to provide Other Support with the application. It is outdated by the time of the award, and we were always asked for an updated version prior to award.
- the fact that some of our investigators and, in particular, our review committees, are spared work on proposals that will not be funded
- The ability to process information electronically
- Not having to provide all materials for proposals which won't be funded.
- It makes sense. It relieves the IRBs of unnecessary work. It also makes the other support documentation more meaningful.
- I don't have to chase down investigators for IACUC approval in the face of a tight deadline.
- Don't have to prepare documents for proposals that will not be funded.
- Less paperwork when grant is submitted.
- It requires less paperwork up front and makes the proposal process go more quickly.
- Providing up to the minute Other Support documentation when needed

## **F6 Reasons for Liking Just-In-Time**

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- Prevents unnecessary work.
- We don't have to provide detailed documentation at the time of proposal submission/
- no need to provide JIT info. on applications that are not close to the funding range protocol approvals more in line with budget/project periods
- We really like the fact that many materials are not required unless a grant will be funded. Also, it's considered good news to receive a JIT request since it usually means that funding is imminent. The best change was to allow IRB and IACUC protocols to have "to be submitted" status on the application. This greatly reduced the burden on our IRB and IACUC reviewers.
- It reduces the need for documentation on proposals which may not be funded.
- Don't have to send in all material for grants not funded.
- INFORMATION REQUIRED IS PRETTY MUCH STANDARD
- Do not have to worry about submitting at proposal time, saves wasted time for those proposals not funded
- No need to do human and animal subjects for as many proposals as before. Less follow-up, fewer protocols to be reviewed by IRB and IACUC.
- Decreases administrative burden
- It is somewhat easier to develop an internal budget, and fine tune if an award is made.
- No need for our IRB to spend time reviewing applications prior to submission that are later not approved for funding. Time spent preparing supplemental sections is only required only when the application is approved.
- Regulatory approvals not needed until time of award.
- Applications can be submitted before documentations are ready
- Admin. burden is reduced (overall) since we only have to provide JIT info for approx 25% of proposals submitted
- 1. IRB/IACUC approvals not needed at time of proposal (or within 60 days of submission) 2. Information provided is current
- I don't have to provide the information with the proposal.
- Eliminates unnecessary work
- Encouraging the faculty who have to submit the information in that chances of funding are pretty high.
- The need to only prepare this information/document for those proposals likely to be funded.
- JIT saves an enormous amount of committee review time.
- I like not having to go through the process of obtaining protocol approvals for projects that may not get funded
- Not having to do everything up front; reduces IRB and IACUC burdens.
- Information only required when it's needed and can be provided thru on-line process.

## **F6 Reasons for Liking Just-In-Time**

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- Eliminates wasted time and effort for our compliance committees.
- Don't have to provide the materials if the proposal is "Triaged" out...
- A number of proposals are not funded the first time, so the compliance and other support documentation do not have to be provided until it is funded. We can now submit this information through the NIH Commons.
- The need for IRB & IACUC approval only if it looks like the grant will be funded. Not having to write, proof and include long budget justifications.
- Submitting the additional documents when a proposal may be funded. This procedure cuts down on the paperwork for us.
- It give us more time to work with PI to secure approval for use of human subjects or animals. NIH staff used to ask for the same information repeatedly, that happens much less now.
- Haven't run into any. Procedures are still required by our University. JIT can add sever time pressure to the Process using Just-in-Time
- Not having to submit forms for grants that won't be funded.
- I like that it does not burden the PI and institution with providing certain information at the proposal stage that might no longer be current at the award stage.
- Needless paperwork is eliminated.
- time saved
- JIT reduces the amount of information requested for unfunded applications. JIT allows investigators time to apply for their IRB/ACUC approval.
- Having additional time to get IRB and IACUC approvals dates
- The materials only have to be prepared if the PI is being considered for the award - saves time at the beginning of the proposal process
- I like Just-in-time in that it saves considerable PI's time in processing forms that might not be needed in his/her proposal is not selected for funding.
- The faculty can focus on the science in the proposal, rather than the submission of an IRB protocol. The burden on the IRB and IACUC committees is somewhat reduced because there is less timing pressure.
- Not having to provide certain material until it is absolutely necessary.
- Reduces burden of providing approvals (IRB, IACUC, etc) until funding is likely. This saves time for everyone (PI, central administration, review committees).
- I especially appreciate that some of this material, which can be very detailed, does not have to accompany the application at submission.
- I like not having to work on the "other support" section until needed.
- Pre-review burden is definitely less.
- The alleviation of unnecessary abuse of the IACUC and IRB offices reviewing protocols that may not be funded.

## **F6 Reasons for Liking Just-In-Time**

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- Makes sense to only deal with "other support" detail if funding is likely, and to submit some of the other materials at that time.
- Not having to do the administrative work in a rush for projects that are not funded.
- Ability to delay certain process
- Decreases administrative burden and grants go out the door more quickly.
- Virtually everything -- but at times it is a rush
- It's positive that our IRBs and IACUC have to review only protocols that will be funded.
- can't really speak to this aspect of the process since our School of Medicine office is not directly impacted by this. The individual departments are impacted when our central research office contacts them. Seems to make a lot of sense though and in most cases I believe our investigators have the necessary information prepared already and available when requested.
- Bio-sketches and Other support
- ability to get proposals in without all details
- overall, less work for IRB and other safety committees
- It saves time and energy because only investigators with a great chance of being funded need to provide additional information.
- Simplifies the application process for our investigators
- It has reduced the burden of the IACUC and the IRB. This is a significant improvement to the process.
- The fact that some of the work can be put off and is not needed for all proposals.
- that time isn't wasted filling out the info by p.i.s who won't get funded--they never have it ready ahead of time. Also, other sources of funding is a moving target, so it should be filled out at the last minute. That's the way it should be even on non-modular grants.
- I like the fact that the other support is at the proper time to report. If a grant is proposed with other support and is not funded for 6 months to a year then the other support has likely changed.
- Materials requested are standardized and the office to submit the materials is clearly identified in e-mail message.
- Delays the initial need for information on all grants
- Eliminates the necessity of submit paperwork for investigators who will not be funded.
- We don't need to address certain issues (e.g., proof of training in human subject research) at the proposal stage.
- Notification process works well.
- The fact that the institution doesn't waste time gathering the information for all grant submissions, but only for those likely to be funded.
- I like completing the information when needed rather than for the proposal.

## **F6 Reasons for Liking Just-In-Time**

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- IRB/IACUC/Other Support is not requested unless the award receives a decent score. This removes some of the proposal-review burden at the initial application stage.
- Work required only if funding odds are pretty good
- The process is straightforward.
- That it clearly states that all administrative materials are to be included in the submission.
- Not having to provide detail information for projects that are not receiving funds; having JIT on Commons
- The P.I. or the committees do not have to waste time reviewing something that could possibly be funded.
- the procedures do not place unnecessary burden on PIs at the time of application
- It gives us a heads up about pending funding
- saves time in pre-award process
- The elimination of unnecessary administrative work on applications that will not be funded. The ability to provide more up-to-date information, since a lot can change between submission and award.
- Not having to submit this information at the time the application is submitted.
- We do not have to submit materials for applications not likely to be funded.
- Just-in-time procedures just-make-sense. It relieves the PI and others of going through a lot of red tape and gathering an incredible amount of information that most probably won't ever be necessary.
- Not having to complete/provide information not needed until/if an award is made that does not impact the award decision.
- The request for submission of the just-in-time information provides sufficient lead time so as not to send the Investigator into a panic that he/she will miss a submission deadline.
- We are only submitting required information when an award is eminent.
- Only needs to be submitted when proposals are being considered for funding.
- Being able to view status of NGA
- Not having to develop the Current and Pending Support pages until a proposal is deemed likely to be funded is a good feature.
- only needing to prepare materials if in fact the proposal is being reviewed favorably.
- If a PI is not likely to be funded, not having to submit at time of the application is nice.
- helps the investigator
- Fewer requests for information, less IRB IACUC review and less prep of other support pages.
- At proposal application level not having to submit all info until award selection...

## **F6 Reasons for Liking Just-In-Time**

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- Can't really say I "like" it. It is just a way of doing business. It doesn't save the universities any time.
- Notification to institutional grants office that materials are requested. Perhaps an email to the investigator and grants administrator would work better.
- Once I figured out what Just-in-time really meant, I'm pretty satisfied. You don't have to worry about all the details at once. I go back to the days when all the forms had to be completed, everything was extremely detailed and having this method is much easier.
- That investigators do not have to wait on approval of IRB and IACUC prior to submitting an application.
- Allows non-critical administrative tasks to be deferred from application process.
- Only preparing these materials (which can be time-consuming) for funded applications
- I like that we don't have to spend time during the proposal stage getting information that may never be needed by NIH. I also like that we don't have to provide the information until it is requested so we don't have to keep track of submitting information within 90 days of proposal submission.
- More timely information about LOE, current and pending support; ability to verify IACUC and IRB clearances are current. We don't have to deal with these issues at submission time, which would detract faculty's focus on the science.



## **F7 Reasons for Disliking Just-In-Time**

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### **F7 Reasons for Disliking Just-In-Time**

- Collecting all the information in a short period of time. This process puts the burden on our Departmental Office more than the PI office.
- Sometimes the time frame for providing documents is very short. For example, I got a just-in-time request with only 5 hours to submit information, last week, before the end of the fiscal year.
- No real reduction in time. The time lines for reply are problematic. We are asked for materials more than once. Requests for information are often sent only to the PI, with very short turnaround time. In fact our IRB and IACUC cannot respond in the short time frame given so there can be little change in PI practice.
- The time frame to turn around submission of the requested material. Sometimes, the time line doesn't meet up with the time line for our review boards, or the time line falls within a semester and PI is not around.
- Some institutes request JIT information right after the study section meets, as well as just before the grant is funded. COULDN'T YOU PLEASE PUT AN END TO THIS????? In addition, having to gather Other Support information in a hurry is nearly always difficult. This is probably because no one in the academic community has a really terrific real-time tracking system, but in any case, for those institutions with much NIH funding, more time is spent correcting Other Support statements than on almost any other part of the grants process, and that seems wasteful.
- Often submit the materials several times to different individuals. Seems to be an uncoordinated effort on the part of NIH.
- This step becomes an added step (separate from proposal submission). Therefore it's not as automatic as it is when it's done all in one step as proposals are submitted.
- It seems like there is always a rush at the end to get everything in when the award is being made.
- I feel like I'm asked for the same stuff several times. Also, it's easier to get the information at proposal time so I'd like to get the information up front when the PI is working directly with our office on an almost daily basis. This is probably mostly a function of being a large university with a centralized office as opposed to working in a departmental sponsored programs office.
- 1. Multiple requests for same information. It often seems that information submitted to the general fax # of the Grants Management Office listed in the JIT request doesn't get where it needs to go, and we get requests a few months later from the Program and/or Grants Officer for the same information.
- Not given much time to gather all requested information when grant is about to be awarded.
- Short turn around time.

## **F7 Reasons for Disliking Just-In-Time**

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- 1. I dislike it if several NIH administrators request the same information at different times in the proposal review and award process. 2. I also dislike it when the JIT request gives only a few days for the materials to (1) be prepared by the PI and (2) to be authorized by the institution (if not submitting the information via the Commons). 3. Finally, I dislike it when only the PI receives the JIT request instead of the request being sent to the PI AND to the OSP. The PI may not respond ASAP, or may not even know what to do with the request, leading to delays and rushes on the part of OSP.
- The inadequate methods used to notify my office about the need for just-in-time documents. Sometimes it is sent to the PI, sometimes it is sent here, sometimes it never arrives or goes to the wrong person. The same occurs with grant award notices.
- It does not save time for administrators--it is a hurry-up process and we run into problems if the researcher is out of town or country. Even the name of the procedures raises my administrative hackles--we urge our faculty to get paperwork done early, not just-in-time.
- Where do I start? Commons allows JIT submission. We work to get it uploaded and then grants management tells us that they don't have access to it. Three different people in three different offices ask for the same info. The term "updated other support" is still used, so investigators get confused and try to submit updated biosketches. Some grants management seem to have no clue that IACUC and IRB are ethics boards that take time. I cannot pressure them to give approval, nor is appropriate to say "Get me IRB approval by tomorrow or the grant won't get funded.", especially if the PI was just informed of the potential for funding. Grants management needs to be educated on this issue.
- The urgency of having to submit document quickly at the time of award. Often seems to compete with the next NIH deadline stress in this office.
- Not enough time is allowed for our responses.
- The last minute nature is disrupting to the work flow. The PI may not be available at the time the request is made.
- requests for JIT materials should be sent out mindful of major grant deadlines
- it requires time management skills for the PIs - something they need to master anyway
- PIs sometimes panic at the rush of getting the information in at award time thinking that they will lose their award.
- The speed in which we need to supply the materials can be very burdensome. Some grants specialists have requested immediate turn round. It would be helpful to set a standard for time to respond.
- This increases by a small amount the burden for administrators since it requires handling projects twice. But if this helps the PI's the increase to the administrators is inconsequential.
- The fact that sometimes a researcher is sent a JIT request, then not funded. There are disclaimers all over the place, but it is still very disappointing and demoralizing to the researcher to have the information requested, but be denied funding. Frequently, no explanation is ever given for the decision not to fund, so the decision from the researchers perspective seems capricious.
- the last minute pressure makes it hard to plan workflow in those areas effected

## **F7 Reasons for Disliking Just-In-Time**

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- It's a rush and with travel and other commitments of the PI, getting them to do things on short notice can be difficult.
- IRB turn-around time for review sometimes not adequate.
- Broader use of electronic medium for all institutions. This will create an even faster mechanism.
- When a range is fundable on the pink slip it would be helpful to include a note to the PI to begin the IRB process because we have noticed that PI's sometimes let this process slip after the application is submitted and they can't get approval by the start date.
- More often than not, the university is required to submit the same document two or three times.
- The urgency with which the system must respond to requests for JIT information.
- The turnaround time
- On occasion we are asked for the same information multiple times. Also at times when a PI is out of town it can be difficult to meet the turnaround time requested by NIH staff.
- The central admin office is not always included in the JIT request.
- n/a -- I haven't experienced post-award application of Just-in-Time procedures.
- Some institutes at NIH require written authorization to reduce a PI's effort prior to making an award. Effort is often reduced to the levels reviewed and approved in the original application, and the reduction is allowable under expanded authorities. This is unnecessary, duplicative burden on institution staff and staff at the other NIH institutes.
- In most cases, PI's have obtained necessary compliance authorizations since pilot data is extremely important in demonstrating feasibility of scientific approaches to the peer review committee.
- Frequently, we are rushed to submit the required information in order to meet the NIH imposed deadlines. Plus, the timing is often in the middle of other big deadlines.
- It seems that NIH e-mail the PI directly and our office of research does not hear from it until institutional signature/approval is required. We would like to be informed at the same time as the PI is required to provide additional documents/information to NIH. This would be very helpful to us.
- Need better communication with the grants office as well as the PI.
- At times we are notified of need for JIT materials just before the grant is to be awarded. This can cause a mad scramble to put materials together on very short notice, which can be difficult on large projects in particular. Also, many requests seem repetitive in nature. A better way to manage the request process (i.e. a standardized document listing exactly what is required for JIT submission, preferably in electronic format) would make this process simpler. Overall, however, this is a major saver of resources for the institution.
- The duplication of currently funded grant information in the biosketch and in the Other Support.

## **F7 Reasons for Disliking Just-In-Time**

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- The amount of time given between the request for things like Human Subject protocols and the deadline for receiving them are not always realistic. Time for the IRB to review and approve the protocol should be considered when setting the due date. Although, we have never had trouble getting extensions when needed.
- Quite often we are asked for JIT for the Council and then again, prior to award. It would be best if only requested prior to a confirmed award.
- the timeframes; granted, it is the end of the fiscal year, but we received a JIT request today and were given one hour to supply the information (which, incidentally, had already been supplied two weeks before)
- I think that more time needs to be given to get materials to the agency prior to the award being made.
- I dislike that Just-in-time information provided prior to award is due with such short term notice.
- PIs are often pressured into hurrying the administrative procedures - this places additional pressure on the Institutions safety and compliance committees. The electronic process has no built-in routing notifications. When a PI enters information the institutional officials are not notified by the Commons system. Often, the notices are sent only to the PI and not copied to the grants administrators.
- On several occasions we have been asked to provide the same information, after having sent it in, repeatedly.
- The frequency of J-I-T information getting lost between the Institute and the institution seems to be increasing. This is perhaps because of the back-end rush that both sides experience.
- NIH grants management pressure to provide JIT documentation with unrealistic deadlines - i.e. by the end of the day, by tomorrow. We just can't pull it together with a snap of the fingers.
- multiple requests for the same information (i.e. updated current and pending support) no "standard" across I/Cs on how or when JIT information is requested
- We often get multiple (two or three) requests for the same JIT information for the same grant. Usually requests are from the grant specialist, an assistant in the grants office, and occasionally also the program officer. We send or fax the same information to each.
- Sometimes the IRB information is not completed within the notice time given by the JIT email.
- Typically short turn-around time.
- short response time--in one situation it was 48 hours
- Items must be submitted several times, less time to provide information to NIH, which is especially difficult when multiple institutions are involved (need to rush).

## **F7 Reasons for Disliking Just-In-Time**

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- It has tripled the paperwork and had a great impact on email & phone calls through the central office. The info has to come through RSP, so we are fielding both the requests from the NIH and the responses from the PIs. There is no documentation of this increased load, so it is difficult to convince bosses of the need for more staff. It also seems that, not only do the G&COs want the information NOW, they lose it an astounding portion of the time and it has to be resent. Each of these phases causes someone to get the email or call from NIH, go get the file, contact the PI or department administrator, wait for a response and follow up if the info is not received, and process the info once received, forward to the NIH, and put the file back. As we are a university with a huge volume of NIH proposals and awards, this has added a tremendous burden that was not there when we simply received all of the paperwork at one time for processing.
- I find it hasn't really reduced by workload---but I'm at a small institution, where I handle all preaward issues, IRB, Animal Care, etc., and some postaward issues, intellectual property etc.
- There does not seem to be a system-wide process for requesting the information. It is a bit disorganized across the board.
- Institutes which accept documentation directly from PI, without verification from institution
- For the 25% that require JIT response, the short turn-around time creates an increased burden ---- limited to approx. 1/4 of our submissions.
- The mad dash at the time of award.
- It can sometimes be confusing about which type of application PI's are submitting and exactly which paperwork is required.
- Requests for the information without confirmation of receipt or individuals requesting the same information more than once
- The "hurry up" aspect. Although, administrative requirements are eased at submission time and increased later in the process - overall I think it's a winner.
- Short deadlines for submission. Potential for PI to submit without routing through central office.
- The window for turn around is very small, NIH asks for things piecemeal.
- Need more "lead time" to get IRB approvals--
- The need to list Other Support in the application and then having to send it again in another format.
- Constrains time to get approvals
- The short time in which Institutions must respond to JIT requests.
- We frequently submit forms based on a request from CSR. By the time the NIH grants specialist is processing the award, our documents have been lost and must be resubmitted. In some cases, NIH waits until the last minute before requesting the forms. There should be a more standardization of 1) which proposals will have to submit forms; 2) when the forms will be requested, and 3) to whom the forms should be sent. This last item may be solved by the NIH eRA Commons, at least when it begins to accept documents that are not all ready at the same time.

## **F7 Reasons for Disliking Just-In-Time**

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- The request for JIT usually goes to the PI, who may not get it to their department or central research administrators to review and submit in time. The review scores also to the PI rather than the research office, so we don't know ahead of time if the proposal is in the fundable range, and PIs should start their review process for compliance with human or animal subjects well before the JIT notice. If this information could come from NIH to the research office, we would be able to monitor and manage the process better.
- Having to provide info so soon after submission; it would be simpler to include with original. Also, having to provide info more than once.
- It seems at time that the time between the call for just-in-time information and the deadline for its receipt is rather small. I know NIH officials have their own deadlines to meet and they allow as much time as they can. This is not a major complaint. On the whole, I am very pleased with the just-in-time procedures that have been implemented.
- Requests for this information to be submitted ASAP and sometimes the PI is not available.
- Currently there seems to be some confusion at NIH regarding how the JIT information should be submitted to NIH. Sometimes we have Program Managers request it directly from the faculty, and sometimes the NIH contracts side can not access the Commons site for the download. In addition, the download on Commons only provides for one document, and there may be several. The process for requesting the data needs to be clarified.
- We get repetitive requests for JIT information and when the information is requested, it is always "urgently" needed. This puts pressure on the Human Subjects and Animal Welfare Committees to review and approve proposals quickly.
- NIH staff from different offices often request the same materials.
- Request for compliance materials at the last minute. This is disruptive of normal processes and can cause problems of PI assuming that decision to fund provides sufficient approval of IRB or IACUC responsibilities. Major problems can occur when institutional compliance committee requires significant changes in procedures after the decision to fund.
- Ability to delay has taken an 11th hour process and made it an 11 hr and 59 minute process. Never completed in time
- While not a JIT issue per se, we have been having difficulty submitting it in the Commons (it frequently does not go through and we typically have to provide it hard copy anyway).
- Occasionally these materials have to be provided within a very brief period of time, and this can be stressful for administrators with multiple responsibilities. It is also somewhat more awkward to review this material because it is not automatically provided with the grant application.
- IRB and IACUC approvals can be difficult if the PI has not done the paperwork at proposal submission time. If they wait until NIH asks for it, it put a LARGE burden on our compliance committees.
- Sometimes investigators delay seeking IRB,IACUC, etc. approvals - which can burden these Committees when deadlines are close

## **F7 Reasons for Disliking Just-In-Time**

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- Lack of communication of the newly developed submission thru the NIH Commons - we just stumbled across the link and had to figure out how it worked. Now I am aware this option is relayed through the JIT email request. We wish the NIH Commons personnel worked closer with the NIH Grants Specialists - it seems there have been some communication issues.
- The close deadlines for submission. Getting the timing right for human and animal protocols is difficult.
- Needing to provide documents with very little turn-around puts a strain on our staff.
- The short and unexpected time frame for submitting other support, etc.
- The mad dash, usually at the end of a quarter, especially at the end of September, to get information in.
- Overall I think just-in-time is a good feature however it sometimes requires that Sponsored Programs staff drop other work in order to assist PI's in getting updated forms and approvals to the agency.
- Would like it to be applied to financial disclosures as well.
- We often have to submit JIT information 2 or more times before a grant is awarded. Also asked to submit information in hard copy after submitting it through the NIH Commons. Besides being inefficient, this is incredibly annoying!
- IACUC and IRB's These take more time and the PI's are constantly pushing the committees and staff.
- As a Research Office, it is difficult to keep material related to a single grant in the same file, because the material is produced/submitted at various times.
- The "hurry up" mentality when the JIT materials are requested.
- Repeatedly getting requests for the same information that has already been supplied
- Usually JIT requests come at same time as preparing applications for submission. Requested fast turn around is stressful. Some agencies require both PI and institutional signature. Institutional signature should be sufficient.
- the two week turn-around time needed; especially for IRB approvals.
- Not uniformly enforceable across all research departments.
- Nothing - but would like to include for sections of the application as a just-in-time request if possible, from a scientific standpoint.
- The time we have to approve something once we received notification that it will be funded.
- notification of information needed with a very short turnaround time.
- Compression of the volume and time required to provide the information requested. This occurs occasionally when a relatively large number of grants are being considered for funding.
- If signatures are needed from university officials it may take longer at our institution than what NIH wants, because of our signature process
- The quick turnaround requirement from NIH staff

## **F7 Reasons for Disliking Just-In-Time**

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- None. All institutes/centers have made it easy for us to provide the JIT information, by mail, fax, and even email in some cases.
- speed with which materials must be provided when an investigator is being considered for an award
- The same as above. We get notified of the JIT and usually neither the IRB nor the IACUC have yet reviewed the protocol. This normally takes about 1 month for review. Usually we are told we do not have a month to get this information to NIH. We have also had repeated requests for the same information - sending it to several locations.
- Not enough time to respond at potential award notification
- I don't like having to revisit a grant that I submitted six months ago and pull information together in a very deadline fashion. It's stressful and sets one up for errors. I'd rather just submit everything at the time of the grant submission.
- there is some inconsistency in "flow down".. some institutions we've been sub's too have not required correct documentation (including Human Subjects approvals/education certifications)... which means the PI thinks it doesn't apply ... conflict is an issue. so - education on how JIT impacts consortium agreements might be a topic for future training sessions
- There's not enough notice given to supply the requested materials. There are not any centralized instructions for JIT.
- Quick turnaround time when JIT requests come in. Trying to find or contact faculty at award time because they are on research trips. Investigators tend to delay human subjects or animal experimentation review too long and then want IRB/IACUC to respond right away. Asked multiple times for the same JIT information.
- Comes several months after the grant is submitted and are no longer familiar with the original grant material without re-review. Comes when we are really busy with subsequent deadlines.
- We request protocols to be reviewed when the proposal is submitted.
- The timing can sometimes feel pressured, particularly to get collaborators at other institutions to comply with the revised "other support" pages, etc.
- We have experienced few, but significant problems for awards that are being made at federal fiscal year end if PI hasn't received IRB/IACUC approval. Awarding components need to be more flexible in these situations - making awards and restricting human participant/animal use until approval is obtained. We are faced with the choice between pulling together a meeting of 15 or so individuals on short notice or foregoing an award.
- I don't dislike it because, I'm the one who has to push the faculty and or the AA to get it done.
- The crunch time when having to provide the information
- It really hasn't saved us that much time. The info provided on an other support page, is still requested on the bio sketch to a certain extent.
- We cannot always respond on a timely basis with IRB approvals due to timing of scheduled meetings. This can hold up funding.



## **F7 Reasons for Disliking Just-In-Time**

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- The quick turn around. PIs tend to get caught flat footed and a IRB or IACUC approval is not a quick turn around item. I do like that the NIH will sometimes issue an award with restrictions so that some work may begin on the project.
- Only that it seems only the PI is notified that information is being requested and by the time our office learns of the request, so much time may have elapsed that we are faced with very short time lines to get information submitted.
- Quick turn-around necessary to submit required paperwork.
- turn around time
- There is difficulty in providing information on short notification.
- Stress involved in trying to pull together all forms/documentation just prior to award. "Other Support" form is confusing for most investigators.
- Sometimes the turn around is almost too immediate.
- The short amount of time in which NIH requires this information when it is requested.
- Would like to have a little more time to gather required information