

Sponsored Programs Administration Buzz Session

May 28, 2025

12:10 – 1:00 PM CT



Agenda

- Federal Updates
 - NIH
 - DOD
 - NSF
 - DOJ
- Q&A



NIH



ZOOM POLL

Are you working on any
NIH R01s for the June 5
standard due date?



New NIH R01s

Notify SPA by	Release Proposal and RSS IFs by	Proposal due to NIH by
Thursday, May 22	COB Monday, June 2	5:00 PM CT on Thursday, June 5

March 31, 2025

This funding opportunity was updated to align with agency priorities. Carefully reread the full funding opportunity and make any needed adjustments to your application prior to submission.



Notice of Civil Rights Term and Condition of Award (NOT-OD-25-090) 04/21/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-090.html>

- By accepting an award, recipients certify that:
 - They do not, and will not during the term of this financial assistance award, operate any programs that advance or promote DEI, DEIA, or discriminatory equity ideology in violation of Federal anti-discrimination laws
 - They do not engage in and will not during the term of this award engage in, a discriminatory prohibited boycott
- NIH reserves the right to terminate financial assistance awards and recover all funds if recipients, during the term of this award, operate any program in violation of Federal anti-discriminatory laws or engage in a prohibited boycott
- The NIH GPS Section 4.1.2 “Civil Rights Protections” will be updated to incorporate this standard term and condition of award



JIT Notices to ARO and PI

Date: May 15, 2025

RE:

Dear Authorized Organization Representative (AOR)

This communication is regarding the grant referenced above. To proceed with funding consideration, the scope of the award including all the subprojects must be renegotiated to make it consistent with NIH's ongoing internal review of NIH's priorities and the alignment of awards with those priorities.

Specifically, NIH funds may not be used to support any Diversity Equity and Inclusion (DEI) related activities that were proposed in the application, or for any other DEI-related research or training activities, or programs. A term and condition to this effect will be included in any Notice of Grant Award. In addition, NIH funds may not be used to support research activities involving climate change, vaccine hesitancy, gender identity, or collaborations with China.

If this award involves human subjects research, information regarding study participant "gender" should not be collected. Rather, "sex" should be used for data collection and reporting purposes.

To continue with award consideration, all that is needed is a reply from an **AOR** to this communication affirming that the recipient organization acknowledges the funding restriction to renegotiate the scope of the award. **This acknowledgement must be submitted within two (2) business days of the date of this correspondence.** Please 'Reply All' to the email to facilitate processing of the response. Please note that NIGMS is not requesting any revised documentation at this time, and any extraneous materials submitted in response to this request will not be accepted.

We appreciate your immediate attention to this request.



Reminder: Application Requirements for Projects Involving Activities Outside of the United States or Partnerships with International Collaborators (NOT-OD-25-098) 04/23/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-098.html>

R&R Other Project Information Form

- 6. Does this project involve activities outside of the United States or partnerships with international collaborators?
 - Regardless of whether the foreign component will receive funds from the NIH award
- If yes, then: 12. Other Attachments
 - Include a file named "Foreign Justification"
 - Begin the document with heading "Foreign Justification"
 - Describe the special resources or characteristics of the research project (e.g., human subjects, animals, disease, equipment, and techniques), including the reasons why the facilities or other aspects of the proposed project are more appropriate than a domestic setting

Applications that do not include the required attachment will be withdrawn

- <https://grants.nih.gov/grants/how-to-apply-application-guide/forms-i/general/g.220-r&r-other-project-information-form.htm#6>



Updated NIH Policy on Foreign Subawards (NOT-OD-25-104)

05/01/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-090.html>

- NIH is establishing a new award structure that will prohibit foreign subawards from being nested under a parent grant
 - Prime award with linked independent awards
- NIH anticipates implementing the new award structure no later than September 30, 2025
 - Also plans to expand to domestic subawards
- Applies to all monetary foreign collaborations.
 - Does not apply to foreign consultants or vendors
- Until details are released, NIH will not
 - Issue new, renewal or non-competing continuation awards that include a subaward to a foreign entity
 - Not accept prior approval requests to add a new foreign component or subaward to an ongoing project
- ICs can renegotiate awards to remove subawards to foreign entities
 - If a project is no longer viable without the foreign subaward, ICs will negotiate a bilateral termination of the project



Implementation Update: Improving the Safety and Security of Biological Research (NOT-OD-25-112) 05/07/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-112.html>

- Rescinds *NIH Implementation of the U.S. Government Policy for Oversight of Dual Use Research of Concern (DURC) and Pathogens with Enhanced Pandemic Potential (PEPP)* (NOT-OD-25-061), released 01/10/2025
- NIH will issue revised guidance within 120 days (09/04/2025)
- NIH will not fund gain-of-function research



Revision: Notice of Updated Effective Date for the 2024 NIH Public Access Policy (NOT-OD-25-101) 04/30/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-101.html>

Author Accepted Manuscripts accepted for publication in a journal on or after ~~December 31, 2025~~ **July 1, 2025**

- Must be submitted to PubMed Central upon acceptance for publication
- For public availability *without embargo* upon the Official Date of Publication

McGoogan Library NIH Public Access Policy Toolkit:

<https://unmc.libguides.com/nih-public-access-policy>



Increased access to publications resulting from NIH funding

- Allows patients, families, and healthcare providers to better understand and address the most critical health concerns facing their communities
- Allows researchers, students, and members of the public in all communities to have equitable access to such content
- Accelerate future research, lead to collaboration, and allow interested readers and patients to follow the latest advances more closely
- Improve transparency and accessibility of taxpayer-funded research



**Supplemental Guidance to the 2024 NIH Public Access Policy:
Government Use License and Rights (NOT-OD-25-049) 12/17/2024**
<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-049.html>

Public Access Policy Requirements Related to Rights

I hereby grant to NIH, a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use this work for Federal purposes and to authorize others to do so. This grant of rights includes the right to make the final, peer-reviewed manuscript publicly available in PubMed Central upon the Official Date of Publication.

Communicating Rights in Author Accepted Manuscripts

This manuscript is the result of funding in whole or in part by the National Institutes of Health (NIH). It is subject to the NIH Public Access Policy. Through acceptance of this federal funding, NIH has been given a right to make this manuscript publicly available in PubMed Central upon the Official Date of Publication, as defined by NIH.



Supplemental Guidance to the 2024 NIH Public Access Policy: Publication Costs (NOT-OD-25-048) 12/17/2024

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-048.html>

Points to Consider when Assessing Reasonable Costs

- Amount of publication cost in relation to NIH award
- Other works researchers may wish to produce during an award period
- Professional and institutional priorities
- Sustainability in terms of the library budget, laboratory budget, and other relevant budgets, if such costs were to be consistently paid
- Relevance of the journal in communicating findings to advance science and/or improve health outcomes
- Suitability of the journal's target readership for the dissemination of the content



Updated NIH Processes for No-Cost Extensions (NOT-OD-25-110)

05/07/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-110.html>

- NIH has temporarily disabled the No-Cost Extension functionality in eRA Commons
- Director of NIH has directed NIH staff to review all existing grants and cooperative agreements to ensure NIH awards do not fund off-mission activities or projects
- At this time, all NCEs must be submitted as a prior approval requests in eRA Commons



Updated NIH Processes for No-Cost Extensions (NOT-OD-25-110) 05/07/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-110.html>

Grants Policy Statement:

- https://grants.nih.gov/grants/policy/nihgps/HTML5/section_8/8.1.1_nih_standard_terms_of_award.htm#Extensio

Commons user guide:

- https://www.era.nih.gov/erahelp/Commons/Commons/Prior_Approval%20Module/Request_NCE.htm?TocPath=Prior%20Approval%20Module%7C_____3

Enter

- Number of months
- Unobligated balance
- Measurable effort for PI?
- Regulatory approval dates

Attach

- Progress report
- Budget and budget justification
- Scientific justification



Notice of Short-Term Extension to Early-Stage Investigator (ESI)

Eligibility Period (NOT-OD-25-114) 05/20/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-114.html>

Early-Stage Investigators

- Within 10 years of completing their terminal research degree or post-graduate clinical training, and
- Have not previously competed successfully for a substantial NIH independent research award

To addresses delays impacting applications between January 1, 2025, and May 31, 2025, investigators whose last ESI-eligible submission date was

- October/November 2024,
- February/March 2025, or
- June/July 2025

will be extended ESI eligibility through October 2025.

eRA Commons profiles

- ESI end dates updated by June 8, 2025
- Investigators may confirm their status via the Education section



NIH Operates Under a Continuing Resolution (NOT-OD-25-084)

04/03/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-084.html>

On March 15, 2025, President Trump signed the Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4)

- Continues government operations through September 30, 2025, at FY24 levels (no reductions)
 - ICs may, at their discretion, issue non-competing awards at a level below that indicated on the most recent NOA
- Policies
 - Legislative Mandates (NOT-OD-24-110) remain in effect
 - Salary Limitation for Grants and Cooperative Agreements
 - Ruth L. Kirschstein National Research Service Award predoctoral and postdoctoral levels



Guidance on Salary Limitation for Grants and Cooperative Agreements FY 2025 (NOT-OD-25-085) 04/03/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-085.html>

- 03/15/2025 Full-Year Continuing Appropriations and Extensions Act, 2025 (Public Law 119-4) signed into law
 - Restricts the amount of direct and indirect salary to Executive Level II
- 01/02/2025 Office of Personnel Management increased Executive Level II to **\$225,700**
- No additional funds will be provided
 - Grantees may re-budget if adequate funds are available



Federally negotiated rate agreement

Current agreement dated 05/09/2024

https://www.unmc.edu/spa/about/unmc_rate_agreement.pdf

Draft fringe benefit rates have been announced but not entered into RSS Internal Forms.

UNMC Fringe Benefits Rates	APPROVED		Draft
Fringe Group	FY24	FY25	FY26
Faculty	29.3%	29.9%	29.1%
House Officers	23.4%	24.9%	25.2%
Staff	31.4%	27.7%	30.5%
Post Docs	24.6%	17.2%	22.9%
Graduate Assistants	0.5%	0.4%	0.6%
Students	2.3%	3.8%	3.2%
Temp	7.8%	7.5%	7.7%



Ruth L. Kirschstein National Research Service Award (NRSA) Stipends, Tuition/Fees and Other Budgetary Levels Effective for Fiscal Year 2025 (NOT-OD-25-105) 05/16/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-105.html>

Line-item	Formula
Stipend	<ul style="list-style-type: none">• Predoctoral \$28,788• Postdoctoral (0 years) \$62,232• Postdoctoral (1 year) \$62,652• Postdoctoral (2 years) \$63,120• Postdoctoral (3 years) \$65,640• Postdoctoral (4 years) \$67,824• Postdoctoral (5 years) \$70,344• Postdoctoral (6 years) \$72,960• Postdoctoral (7 or more years) \$75,564
Tuition and Fees	60% of actual tuition <ul style="list-style-type: none">• Up to \$16,000• Up to \$21,000 <i>for dual-degree</i>• Up to \$4,500 <i>for post-doc</i>
Institutional Allowance	<ul style="list-style-type: none">• Pre-doc: \$4,750• Post-doc: \$12,400
Childcare Costs	<ul style="list-style-type: none">• \$3,000

Updated Procedures for Childcare Costs for Ruth L. Kirschstein National Research Service Award (NRSA) Institutional Research Training Awards (NOT-OD-25-100) 04/25/2025

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-100.html>

- Previously: NIH provided annual childcare costs for each full-time predoctoral or postdoctoral NRSA trainee appointment slot at the time of award
- New: NIH will provide annual childcare costs for 25% of the slots
 - If more than 25% of the trainees have eligible childcare costs, then the recipient may request additional costs via an administrative supplement
- Why the change?
 - Childcare costs are restricted and cannot be rebudgeted
 - Utilization of childcare costs were reviewed and determined to be less than 100%



DOD



Department of Defense May 14, 2025 Memo Implementation of a 15% Indirect Cost Cap on Assistance Awards to Institutions of Higher Education

https://www.cogr.edu/sites/default/files/Implementation%20of%20a%2015%20Percent%20Indirect%20Cost%20Cap%20on%20Assistance%20Awards%20to%20Institutions._.pdf

- While nothing formal is in effect or challenged in the courts. The memo outlines DoD plans to Notify OMB of this change within 21 days of the issue of the Memo and Develop formal policy and procedure around this move.
- Anticipate more formal direction on or about June 4th.
- The proposed change will only impact Financial Assistance Awards (Grants and Cooperative Agreements). Contracts and awards from NSRI would not be impacted.





NSF



National Science Foundation May 2, 2025 Policy Notice: Implementation of Standard 15% Indirect Cost Rate NSF 25-034

<https://www.nsf.gov/policies/document/indirect-cost-rate>

- Policy Notice issued May 2nd.
- Lawsuits followed and is currently under a TRO until June 13th.
- NSF is temporarily pausing implementation of the NSF Policy Notice: Implementation of Standard 15% Indirect Cost Rate, NSF 25-034, through June 13, when a hearing is scheduled to occur in the United States District Court for the District of Massachusetts.
- New NSF awards issued during this pause will not implement NSF 25-034, but will include a term applying NSF 25-034 for the entirety of the award upon a court decision permitting application of the policy.



DOJ



Justice Department Establishes a Civil Rights Fraud Initiative

<https://www.justice.gov/opa/pr/justice-department-establishes-civil-rights-fraud-initiative>

- The Department strongly encourages anyone with knowledge of discrimination by federal funding recipients to consider filing a *qui tam* action under the False Claims Act.
- Nothing directly impacting our Day-to-Day operations, but it is encouraging individuals to report supposed / presumed violations.
- Somewhat related Big 10 peers are seeing more FOIA requests on newly issued awards. UNMC has received to such FOIA requests on new projects that involve animal work.
- Anticipate more inquires on newly issued awards.



Q&A

<https://guides.unmc.edu/books/sponsored-programs-administration-guidebook/page/training>

