Administration of NIH Fellowship Awards

Purpose: The purpose of this operating procedure is to clarify and define the roles of the Faculty Sponsor, the Fellow who is referred to as the Principal Investigator (PI) by the NIH, the Department Staff (DA) in the fellow’s department/unit and in the faculty sponsor’s department/unit, and the Sponsored Research Administrative Services (SRAS) staff: Grant Proposal Specialist (GPS) and Grant Analyst, and the MD/Ph.D. Program Administrator if the fellowship award is an F30. It covers the process within the College of Medicine for the administration of NIH F-series fellowships as follows:

F30, Ruth L. Kirschstein Individual Predoctoral NRSA for MD/PhD and other Dual Degree Fellowships;
F31, Ruth L. Kirschstein Individual Predoctoral NRSA (parent or diversity);
F32, Ruth L. Kirschstein Individual Postdoctoral NRSA; and
F33, Ruth L. Kirschstein Individual Postdoctoral NRSA for Senior Fellows.

An NIH fellowship proposal will outline and detail all expenses required to achieve project aims and objectives. University of Kentucky budgets must comply with federal regulations, which are codified in a single guidance document known as the “Uniform Guidance” or 2 CFR 200 that must be used by all federal agencies. The Uniform Guidance (UG) provides standards to determine whether costs can be charged to federal grants and how those costs should be distributed between direct costs and facilities and administration (F&A) costs.

The standards established in the UG require that all sponsored project expenses must be (1) reasonable, (2) allocable to the project, (3) given consistent treatment, and (4) conform to any limitations or exclusions set forth in the UG or the award requirements.

Introduction: Grants and contracts for sponsored projects represent a contractual obligation between the sponsor and the University for the performance of a specific activity through which the sponsor is entitled to receive some consideration or benefit. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement. The University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit. In turn, the College of Medicine must ensure its faculty members are in compliance with all University and sponsor requirements.
1. For NIH’s purposes, the PI on these awards is the Fellow (student or post doc). Because neither of these roles at UK is considered an employee, the mentor of the student or post doc grant PI must be the PI for UK’s purposes. NIH refers to this individual as the Sponsor. The Fellow will be the Co-I for UK’s purposes.

2. The original Notice of Grant Award (NGA) is emailed from NIH awarding institute to the student/fellow PI and the University’s Office of Sponsored Project Administration (OSPA). This NGA will provide a six-month window for the fellowship to be activated.

3. The fellow must provide the NGA to his/her sponsor/mentor/UK PI and both must read the NGA. It will have details on the budget, which will include a specific annual stipend amount, based on current NIH-prescribed levels; a specific annual institutional allowance amount, also based on current NIH-prescribed levels; tuition, based on a formula from what was requested in the proposal based on current NIH-prescribed levels; and possibly a separate travel budget, if requested as such in the proposal.

4. The initial NGA will provide funding for year one. All years of the funding should be stated in the award, based on current funding limits; however, new and separate NGAs will be issued at the beginning of each budget period, based on current funding limits in place at the time each NGA is issued. (Stipends usually increase each federal fiscal year.) Automatic carry-forward of these funds isn’t allowed, so the project will get a new WBS/UK grant account number for each budget period.

5. Certain limitations on when the award can be activated may be included in the NGA. (For example, “This award cannot be activated from October 1 – 31.” Or “Activation dates between October 1 - November 30 are not permitted.”)

6. The fellow must complete the Individual Fellowship Activation Notice for the first year of the fellowship. No funds can be expended until the form is submitted.

7. A link to the current form will be provided in the NGA. The form as of the date of this SOP is found here: http://grants.nih.gov/grants/funding/416/phs416-5.pdf

8. The Individual Fellowship Activation Notice form requires the fellow, sponsor/mentor, and Institutional Business Official signatures.

9. The Executive Director of OSPA, currently Kim Carter, provides the Institutional Signature. This signature should be coordinated with the department’s assigned Research Administrator (RA) in OSPA, and once signed, OSPA will submit the form to the NIH.

10. Submission of this form would then prompt the RA in OSPA to initiate the WBS/grant account set up for the award.
11. Once OSPA has set up the WBS/grant account, PADR #1 will be issued and distributed to the Fellow, Sponsor/Mentor/UK PI, DA of the responsible unit for the grant*, and SRAS. All recipients must review the PADR for accuracy and agreement with the NGA. Any concerns or issues can be referred to the RA in OSPA. The Activation Notice with all signatures will be attached to PADR #1.

12. *At the time of the proposal submission, the responsible unit must be determined. If the Sponsor/Mentor/UK PI has an HR prime assignment in a center, then that will usually be the responsible unit for the grant as well. The administrator for the center will need to coordinate and keep the administrator for the academic unit for the fellow apprised of activities to ensure no steps related to payment of any of the grant or fellow’s expenses are overlooked.

13. NIH’s on-line electronic grants management system, eRA Commons, uses a specific module known as xTrain for the on-line management of fellowship and training grants. The fellow/trainee must set up a profile in NIH eRA Commons and xTrain (https://era.nih.gov/erahelp/xtrain/) to facilitate the submission of the annual Research Performance Progress Reports (RPPR) and the eventual Termination Notice submission.

14. Upon COM SRAS receipt of PADR #1, a kickoff meeting will be initiated by SRAS Post-Award Manager, and arranged with the Fellow, Sponsor/Mentor/UK PI, DA for responsible unit, Administrator for the MD/Ph.D. program for F30 awards, HR/Payroll contact, expense transaction processing person, COM SRAS analyst, COM SRAS reconciler, and Office of Medical Education Financial Aid staff support person, if it involves an F30 fellowship. The meeting agenda will include the following:

   a. Review of NGA.
   b. Review of budget.
   c. Explanation of rebudgeting limitations, which are not as flexible as regular NIH research grants, and an explanation of why and how the award will get a new account number each year.
   d. Explanation of how the appointment in HR/Payroll system is established. This should include an explanation of what the fellow can expect in payment bi-weekly, what portion is coming from the grant and any remainder from a department funding source. Advise on who to contact if they identify any discrepancies. A table with the schedule and amount of each payment will be provided and reviewed at the meeting. (STILL TO BE ATTACHED AS APPENDIX ONE: SAMPLE STIPEND PAYMENT SCHEDULE)
   e. Explanation of how tuition will be paid each semester. Responsibility for submission of the SAG form needs to be determined. It could be either the academic department where the student is housed or it could be another department where the grant is administered. The fellow and mentor should understand the expectation. For whomever is processing the SAG form, only what the NGA tuition budget provides can be included on the SAG form to charge to the grant WBS. Any additional tuition balance due needs to have a cost center provided on the SAG form to cover that difference.
f. Explanation of how the institutional allowance may be used. There needs to be a determination of who will be monitoring its use and balance, which would usually fall to the DA of the department where the grant is being administered.

g. Explanation of how health insurance is paid. Confirmation should be provided of who is making this payment.

h. If travel is planned, SRAS can assist with a budget revision to move funds from the institutional allowance (likely all in Other Direct Expenses, sponsored E530300, based on initial account set up), if needed. All travel for the fellow would be considered student travel, E530040. Travel can be arranged in various ways. The DA for the responsible unit for the WBS should provide guidance to the fellow on how to do this -- pre-payment with Student Procard and/or reimbursement after travel via BPM on this process. Everyone should be aware that it is a violation of UK policy to pay student travel via any other means (i.e., cannot be paid using a regular Procard that the sponsor/mentor/UK PI may have).

i. Explanation of how to buy other needed items. This process may differ across departments, so the DA will have to advise on this for the fellow.

j. Planning for the eventual termination and process to follow to ensure compliance, including a meeting prior to the fellow’s departure from campus, with an understanding of repercussions on future NIH funding if not done correctly. Recommendation to contact Financial Administrator (FA) in Research Financial Services (RFS) to address any possible discrepancies prior to routing the form to Jennifer Miles as BO in RFS.

k. Unique differences for F30 awards – while the student will transition to the MD program upon completing his/her Ph.D. during the course of the project period of the award, the responsible unit and the PI for UK’s purposes will remain the same for the duration of the project/fellowship period. The need for regular communication between the DA for that unit with the MD/Ph.D. program administrator will be reviewed.

15. SRAS will explain the Monthly financial report (also known as the RFS PI Report) that will be received and address other regular financial review needed by the fellow, sponsor/mentor/UK PI, and DA.

16. An annual progress report is required and is submitted via the Research Performance Progress Report module (RPPR) in NIH eRA Commons. The mentor likely has experience with this system and should provide some support to the PI fellow regarding this requirement. The SRAS GPS will assist in this submission as well. The mentor, as UK PI, will receive an email notification from OSPA of the upcoming due date for this report approximately 60 days in advance.

17. Before leaving campus and in advance of the fellow’s termination date, whether based on the NGA end date or at some earlier date, the fellow PI is responsible for initiating the Termination Notice in xTrain and routing it to Jennifer Miles as Business Officer, in the University’s Research Financial Services (RFS) office. Submission of this form needs to be coordinated with the mentor, DA for the responsible unit for the award, and the SRAS analyst to confirm the stipend amount(s) is (are) accurate. SRAS can arrange a pre-termination meeting to review the process
at the request of the fellow PI, sponsor/mentor/UK PI, and/or the DA. RFS is responsible for submitting the notice to NIH via xTrain.

Fellow PI named on NGA is responsible for:

- Serving as PI for NIH’s purposes and Co-I on UK WBS/grant account.
- Reading the Notice of Grant Award upon receipt.
- Completing the Individual Fellowship Activation Notice and providing to the Sponsor/Mentor/UK PI for signature. Coordinate the submission of this form to OSPA for institutional signature and eventual submission to NIH.
- Reviewing PADR #1 upon receipt from OSPA. Alert SRAS if any concerns for them to coordinate communications with the RA in OSPA.
- Set up and/or update NIH eRA Commons Profile as a TRAINEE to facilitate future RPPR submissions via eRA Commons and termination notice submissions via xTRAIN. Familiarize themselves with these systems.
- Attending kickoff meeting.
- Understanding the anticipated biweekly payment amount to be expected and confirm its accuracy upon receipt.
- Coordinating with the DA the payment of the appropriate tuition amount via the SAG form.
- Requesting payment for expenses via the institutional allowance as directed by the Sponsor/Mentor/UK PI and the DA.
- Reviewing the monthly PI Report received from RFS.
- Reviewing subsequent PADRs for accuracy.
- Initiating termination notice prior to leaving campus. Review accuracy of stipend figures with the DA, prior to routing the form to the BO, Jennifer Miles.

Sponsor/Mentor/UK PI is responsible for:

- Serving as PI for UK’s purposes, on WBS/grant account.
- Reading the Notice of Grant Award upon receipt.
- Reviewing and signing the Individual Activation Notice. Coordinate with the Fellow PI the submission of this form to OSPA for institutional signature and eventual submission to NIH.
- Reviewing PADR #1 upon receipt from OSPA. Alert SRAS if any concerns for them to coordinate communications with the RA in OSPA.
- Attending kickoff meeting.
- Overseeing payment of expenses from the Institutional Allowance at the request of the Fellow PI and DA.
- Reviewing the monthly PI Report received from RFS.
- Reviewing subsequent PADRs for accuracy.
- Coordinating submission of the termination notice to RFS with the fellow PI, DA, and SRAS.

DA is responsible for:
• Reviewing PADR #1 upon receipt from OSPA. Alert SRAS if any concerns for them to coordinate communications with the RA in OSPA.
• Attending kickoff meeting.
• Coordinating with appropriate staff – either in the department or the IBU – to set up appointment for Fellow in SAP HR for stipend payments.
• Processing SAG forms for payment of tuition, in coordination with the Fellow PI.
• Overseeing payment of expenses from the Institutional Allowance at the request of the Fellow PI and Sponsor/Mentor/UK PI.
• Processing appropriate paperwork for payment of health insurance.
• Reviewing subsequent PADRs for accuracy.
• At the time the Fellow PI initiates the Termination Notice, review stipend figures for accuracy.

MD/Ph.D. Program Administrator is responsible for (F30 awards only):
• Reviewing all PADRs as forwarded by the SRAS staff.
• Attending kickoff meeting.
• Coordinating/interacting with DA and provide similar type support for all tasks for F30-funded MD/Ph.D. students. This will be the only person who can access and address any related issues with these particular student’s medical student account activity.

SRAS staff is responsible for:
• Reviewing PADR #1 upon receipt from OSPA and coordinate with PI Fellow and Mentor/Sponsor/UK PI and DA to address any concerns to the RA in OSPA.
• For F30 awards, forward any PADRs to the MD/Ph.D. Program Administrator.
• Arranging Kickoff Meeting.
• Offering assistance to the Fellow PI for interacting with eRA Commons, profile updating, and other associated administrative activities.
• Reviewing financial activity on the WBS monthly and follow up on issues identified as necessary.
• Offering assistance with annual RPPR submission, as per usual process for these reports with all PIs.
• For F32s, preparing JVs at least quarterly to remove unallowable life insurance costs.
• Reviewing subsequent PADRs for accuracy.
• Assisting with administrative issues related to termination.

Abbreviations
ASST – Assistant, NIH designation in eRA Commons
BO – Business Officer; NIH designation in eRA Commons
DA – Department/Center Administrator
NRSA – NIH National Research Service Awards
NGA – Notice of Grant Award
OSPA – Office of Sponsored Projects Administration
PADR – Project Account Data Record
PI – Principal Investigator
RA – Research Administrator (OSPA staff)
RFS – Research Financial Services (UK office)
RPPR -- NIH annual Research Performance Progress Report
SAG – Scholarship and Grant (SAG form is used by Student Financial Aid for processing certain expenses on student accounts)
SRAS—Sponsored Research Administrative Services

STILL TO BE ADDED AS APPENDIX ONE:

SAMPLE STIPEND PAYMENT SCHEDULE