

NIH Roles for Grants:

Co-Is and OSCs and Consultants, oh my!

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SPA/Sponsored Programs Administration

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1

The presentation in one slide

	Co-I	OSC	Consultant
Sr/KP	Always	Always	Depends (SOW)
Biosketch	Yes	Yes	If Sr/KP
Other Support	Yes	Yes	No
eRA credential	Always	Always	If Sr/KP
Grant effort	Yes (check NOFO)	Never	Never pms/cms Could be milestones
Compensation	Effort/IBS-based	"zero person months"	Daily/hourly rate

2



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Past Sessions - Archives Buzz sessions

- August 23, 2023 (Gift versus Grant determination)
- July 26, 2023 (Other Support and Foreign Influence)
- June 28, 2023 (Cayuse Proposals [S2S] demo)
- May 24, 2023 (ADIS Internal Forms demo [routing ADIS IFS])
- April 26, 2023 (NIH updates)
- March 22, 2023 (NIH NRSA F grants)
- February 22, 2023 (Ticker updates)
- January 25, 2023 (NIH updates)
- October 26, 2022 (SPA 101)
- September 28, 2022 (NIH FORMSH)

3



More SPA Guidance

<https://unmcspa.zendesk.com/hc/en-us>

596
ALL OPEN TICKETS

323
SUBMISSIONS
GRANTS AND CONTRACTS

38
GRANT AWARD SET-UPS

235
CONTRACTS
NEGOTIATION AND AWARD SET-UPS

138
TICKETS CLOSED THIS WEEK

Q. Search

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Award Set-Up Technology Transfer

Post Award Guidelines Resources & Templates

Award Close-Out NIH Fiscal Year Policy

educational investigators: Register for Training

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4



Agenda

- NIH Roles for grants
- In detail:
 - Consultant
 - Other Significant Contributor
 - MPI, Co-I, Co-PI (?)
- Roundup
 - [NIH Policy Announcements](#) (only two slides, promise!)
 - [Vendor](#) vs. [Subrecipient](#) vs. [Consultant](#)

5



NIH Policy Announcements

As you'll recall, applications after Jan 25, 2023 needed to have a [Data Management and Sharing Plan](#) AND we needed to "pull out" those associated costs into a [single budget line item](#). And we needed to explain those costs in the budget justification.

NIH updated that policy in July 2023, which impacted applications submitted after 10/04/23.



6



NIH Application Instruction Updates – Data Management and Sharing (DMS) Costs

NOT-OD-23-161

This was a mid-year update to the Jan 2022 NIH DMS Policy.

June and July NIH grants were not impacted, but Oct and Nov grants are/were.

- NIH will no longer require the use of the single DMS cost line item.
- DMS costs must be requested in the appropriate cost category, e.g., personnel, equipment, supplies.
- While the single cost line item is no longer required, NIH will require applicants to specify estimated DMS cost details within the “Budget Justification”



Help wanted?

SPA/Library DMS Plan resources

<https://www.unmc.edu/spa/policies/nihdmisp/index.html>

Budgeting tool (and more help):

<https://www.unmc.edu/spa/policies/nihdmisp/budget.html>

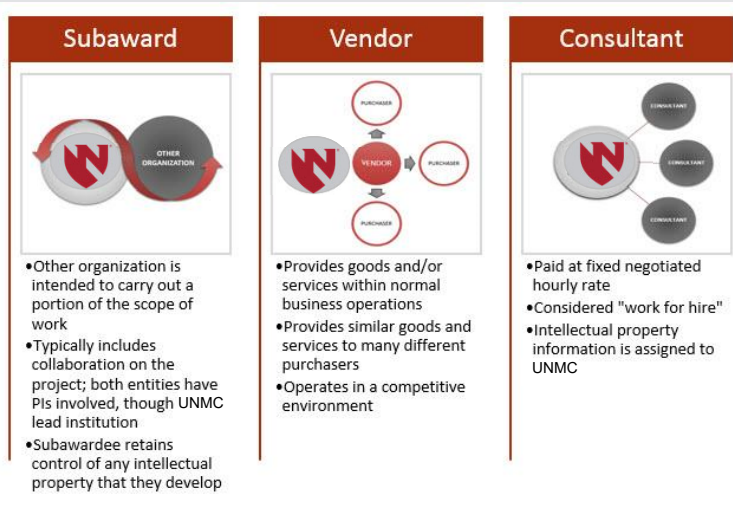


Questions

DMS Plan questions?

9

Vendor vs. Subrecipient vs. Consultant



Sub: an intellectual collaboration between co-equals

Vendor: sells goods/services in a competitive environment

Consultant: "WFH" independent contractor, hourly rate, may/may not be Sr/KP

10

UNMC and “sponsor” systems have roles



One quick note up-front: all systems have **user roles**

- eRA Commons
- NIH
- DoD
- CDC
- HRSA
- NSF
- Grant Solutions
- SAMS direct
- SAM.gov
- Proposal Central
- foundations, foundations, foundations, foundations

We’re not talking about this today, although this is a significant concern.

It takes time to work through who needs which access in which portals.

Also, US gov’t is embracing multi-factor authentication – adds more time. [HRSA, anyone? Amiright?]

We are going to focus on a few **specific roles** for NIH grants: **PI, co-I, OSC, Consultant**

11

NIH Grant Roles



RESOURCES

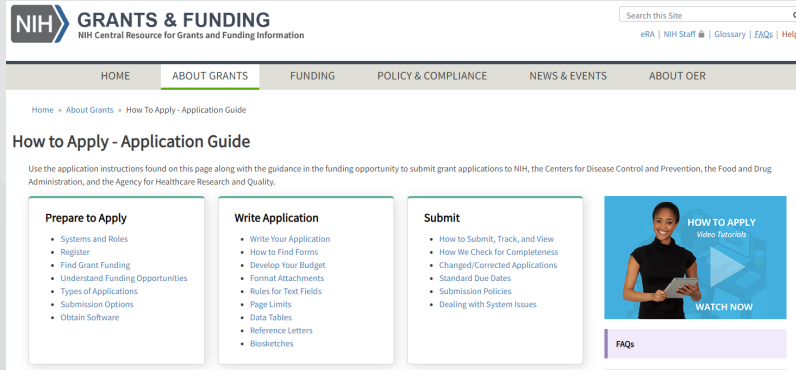


12



The best how-to resource for NIH grants

<https://grants.nih.gov/grants/how-to-apply-application-guide.html>



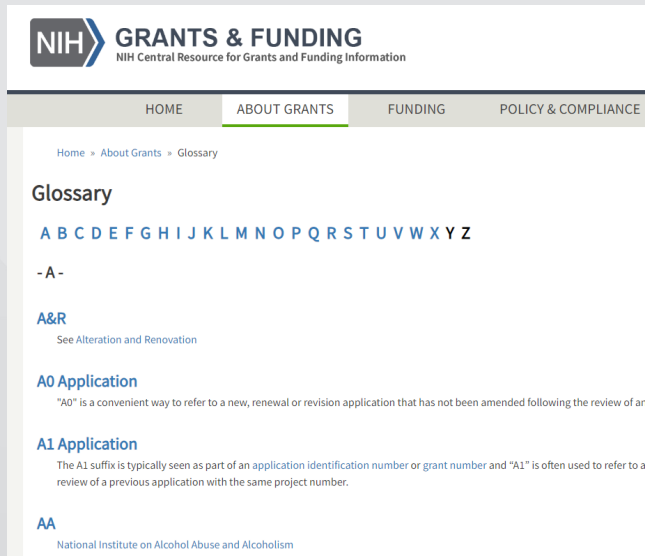
- Research applications
- MPI submissions
- Grants for trainees
- Font limitations
- Resubmissions vs. Revisions
- PHS Clinical Trials Information
- Are URLs allowed?
- Are OSC Sr/KP?
- Page limits for Research Narrative
- How to budget subrecipients
- Letters of Support: how many?
- Mentor reference letters
- Glossary

It's all there!

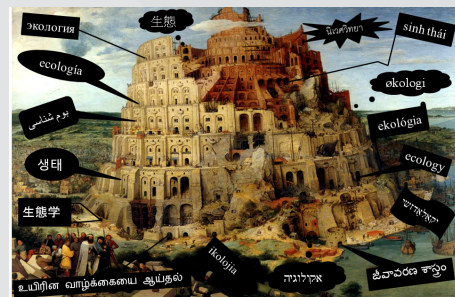
13



Not to be neglected: NIH Glossary



<https://grants.nih.gov/grants/glossary.htm>



Let's take a quick look at four or five defined terms.

14

Glossary Time – Program Director/Principal Investigator



PD/PI

The individual(s) [with] the appropriate level of **authority and responsibility** to direct the project ...supported by the award. ... When multiple PD/PIs are named, each is responsible and accountable to their organization. The presence of more than one PD/PI on an application or award diminishes neither the responsibility nor the accountability of any individual PD/PI.

15

Glossary Time – EEI and ESI



Early Established Investigator (EEI)

A Program Director / Principal Investigator (PD/PI) who is **within 10 years of receiving their first** substantial, independent competing NIH R01 equivalent research award as an Early Stage Investigator (ESI).

Early Stage Investigator (ESI)

A Program Director / Principal Investigator (PD/PI) who has completed their **terminal research degree** or end of post-graduate clinical training, whichever date is later, **within the past 10 years** and who **has not previously competed successfully as PD/PI for a substantial NIH independent research award**.

A list of NIH grants that a PD/PI can hold and still be considered an ESI can be found at <https://grants.nih.gov/policy/early-investigators/list-smaller-grants.htm>.

16



Glossary Time - MPI

Multiple Program Director/Principal Investigator awards are ...multidisciplinary efforts and collaboration ...under a single grant award. All PD/PIs share equally the **authority and responsibility** for **leading and directing** the project, intellectually and logistically. Each PD/PI is responsible and accountable to their organization for the proper conduct of the project or program, including the submission of all required reports. The presence of more than one PD/PI on an application or award diminishes neither the responsibility nor the accountability of any individual PD/PI. Go to [Multiple Principal Investigators](#).



17



Glossary Time - Consultant

Consultant

An individual* who provides professional advice or services for a fee, but normally not as an employee of the engaging party. In unusual situations, an individual may be both a consultant and an employee of the same party, receiving compensation for some services as a consultant and for other work as a salaried employee. To prevent apparent or actual conflicts of interest, recipients and consultants must establish written guidelines indicating the conditions of payment of consulting fees.

***Consultants** also include firms that provide professional advice or services. However, these entities are most often treated as **vendors** (as opposed to **subrecipients**). SPA [training here](#).

18

Glossary Time – Other Sig. Contributor



Individuals who have committed to contribute to the **scientific development or execution of the project**, but are **not committing any specified measurable effort** (i.e., person months) to the project. These individuals are typically presented at "effort of zero person months" or "as needed."



Individuals with measurable effort may not be listed as Other Significant Contributors (OSCs).

19

Poll Question 1



Must all PIs, co-Is, OSC, and Consultants be listed as Sr/KP?

- A. Yes
- B. PIs and co-Is, but not OSC or Consultants
- C. PIs and OSC, but not co-Is or Consultants
- D. PIs and Co-Is and OSCs, but depends for Consultants
- E. PIs and co-Is, but depends for OSC and Consultants

20

Roles for Senior/Key Personnel

[https://grants.nih.gov/grants/how-to-apply-application-guide/forms-g/general/g.240-r&r-seniorkey-person-profile-\(expanded\)-form.htm](https://grants.nih.gov/grants/how-to-apply-application-guide/forms-g/general/g.240-r&r-seniorkey-person-profile-(expanded)-form.htm)

The screenshot shows the NIH Grants Application Guide website. The main heading is "GENERAL APPLICATION GUIDE FOR NIH AND OTHER PHS AGENCIES SF424 (R&R) - Forms Version G". Below this, there is a list of application forms, with "G.240 Senior/Key Person Profile (Expanded) Form" highlighted in green. To the right of the list, there is a detailed description of the G.240 form, including a "Quick Links" section with links to "Profile - Project Director/Principal Investigator Instructions for a Biographical Sketch", "Profile - Senior/Key Person", and "Additional Senior/Key Person Profiles".

- The General Application Guide explains how to fill out the R&R Sr/KP Profile (Expanded) form.
- Faculty and staff on grants must have a role.
- ALL Sr/KP must have an eRA user ID.
- Dept Admins fill this out in [Cayuse](#).
And ADIS.

21

Senior/Key Person Profile form

The screenshot shows the "PROFILE - Senior/Key Person 1" form. The form contains various fields for personal and organizational information, including Name, Address, and Contact Information. A red circle highlights the "Project Role" dropdown menu, which is currently set to "PD/PI". Below the form, a red arrow points to a detailed view of the "Project Role" dropdown menu.

The detailed view of the "Project Role" dropdown menu shows the following options:

- PD/PI
- Faculty
- Post Doctoral
- Post Doctoral Associate
- Other Professional
- Graduate Student
- Undergraduate Student
- Technician
- Consultant
- Other (Specify)

22



RR Senior/Key Person Profile roles mirrored in Cayuse

Prefix: [Redacted] * First Name: [Redacted] Middle Name: [Redacted] * Last Name: [Redacted] Suffix: [Redacted]

Position/Title: [Redacted] Organization Name: University of Nebraska Medical Center

Department: [Redacted] Division: [Redacted]

* Street1: 682155 Nebraska Medical Center Street2: [Redacted]

* City: Omaha County/Parish: Douglas

* State/Province: Nebraska * Zip/Postal Code: 68198-2155

* Country: United States

* Phone Number: 402-[Redacted] Fax Number: [Redacted] * E-Mail: [Redacted]@edu

Credential, e.g., agency login: [Redacted]

* Project Role: Co-Investigator Other Project Role Category: [Redacted]

Please Select...
 Degree Type: PI PD/PI
 Degree Year: Z Co-PD/PI
 Co-Investigator
 Faculty
 Post Doctoral Associate
 Post Doctoral Scholar
 Other Professional
 Graduate Student
 Undergraduate Student
 Technician
 Consultant
 Other (Specify)

Final | Draft

* Attach Biogra [Redacted] Biosketch No draft [Manage] [Delete]
 FIFPDF1134.96KB

Attach Current Support No final | No draft [Add] [Delete]

23



When to use “Other (Specify)”

- When the individual in question doesn't fit the other listed (in Cayuse/RR KP Expanded Form) project roles.
- When instructed to do so by the NOFO.
 - Mentors for trainee awards
- For all Other Significant Contributors
- Other times (ask SPA)

NIH guidance is [here](#).



24

How many co-PIs can I have?



For NIH, the **co-PI** role does not exist.

Project Role:

Select a project role. Use "Other (Specify)" if the desired category is not available.

Special Instructions for Multiple PD/PIs: All PD/PIs must be assigned the "PD/PI" role, even those at organizations other than the applicant organization. The role of "Co-PD/PI" is not currently used by NIH or other PHS agencies to designate a multiple PD/PI application. In order to avoid confusion, do not use the role of "Co-PD/PI."

Neither does “**collaborator.**”

Co-Investigator

An individual involved with the PD/PI in the scientific development or execution of a project. The **Co-Investigator (collaborator)** may be employed by, or be affiliated with, the applicant/recipient organization or another organization participating in the project under a consortium agreement. A Co-Investigator typically devotes a specified percentage of time to the project and is considered **senior/key personnel**. The designation of a Co-Investigator, if applicable, does not affect the PD/PI's roles and responsibilities as specified in the [NIH Grants Policy Statement](#), nor is it a role implying multiple PD/PI.

25

Poll Question #2



Would NIH allow someone from UNMC to serve as a **Consultant** on my NIH grant?

A: **Yes**

B: No

[https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.9_allowability_of_costs_activities.htm#Salaries Wages Co nsulting](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.9_allowability_of_costs_activities.htm#Salaries_Wages_Consulting)

26

UNMC faculty/staff serving as Consultants on UNMC grants



NIH technically allows this, but there are stringent tests for when grant recipient institution F/S can serve as Consultants.

- https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.9_allowability_of_costs_activities.htm#Salaries_Wages_Consulting

In addition, UNMC has even more stringent tests. Individual UNMC colleges have additional requirements.

- HR: https://wiki.unmc.edu/index.php?title=HR_Employee_Guidelines:Home&mobileaction=toggle_view_desktop
- UNMC P&P: https://wiki.unmc.edu/index.php/Policies_and_Procedures
- Faculty and Staff guidance: <https://www.unmc.edu/audience/facstaff.html>

LSS (long story short): This is rare, likely raises audit flags, is meant to be discouraged, and there may be a better way to accomplish what you're trying to do.

27

Questions before we proceed to OSC?



28

Let's talk Other Significant Contributors



29

What is an “Other Significant Contributor?”



Other Significant Contributor (OSC) is an individual ...committed to contribute to the **scientific development or execution of the project**, but has **not committed any specified measurable effort** (in person months) to the project.

These individuals are typically presented at “effort of zero person months” or “as needed” (individuals with measurable effort cannot be listed as OSCs).

Cheat Sheet/Summary Guide

- Always Sr/KP
- eRA Credential
- Never effort
- Always biosketch
- Always Other Support
- Listed **LAST** in RR Sr/KP Person Profile Form

Learn more [here!](#)

30

Exactly how are they listed in grant applications?

[https://grants.nih.gov/grants/how-to-apply-application-guide/forms-g/general/g_240-r&r-seniorkey-person-profile-\(expanded\)-form.htm#Additional](https://grants.nih.gov/grants/how-to-apply-application-guide/forms-g/general/g_240-r&r-seniorkey-person-profile-(expanded)-form.htm#Additional)

Note on OSCs: For OSCs, enter "Other (Specify)" for the "Project Role" field, and enter "Other Significant Contributor" in the "Other Project Role Category" field.

Remember:

- Always Sr/KP
- Listed Last
- Need Biosketch
- Need OS (for RPPR or adding new)
- Need eRA Credential

Prefix: [] * First Name: Charles Middle Name: [] * Last Name: Maris Suffix: PhD

Position/Title: Assistant Professor Organization Name: University of Nebraska Medical Center

Department: Vice Chancellor's Office

Division: SPA, baby!

* Street1: 985450 Nebraska Medical Center Street2: []

* City: Omaha County/Parish: Douglas

* State/Province: Nebraska * Zip/Postal Code: 68198-7835

* Country: United States

* Phone Number: [] Fax Number: [] * E-Mail: cmaris@unmc.edu

Credential, e.g., agency login: charlesmaris

* Project Role: Other (Specify) Other Project Role Category: Other Significant Contributor

Degree Type: PhD

Degree Year: 2003

31

NIH Grants: what's needed for OSCs?

Other Support? No

Biosketch? Always

Daily/hourly rate? Never

Re: budgeting: person months, calendar months effort? Never

Commons ID/eRA credential? Always always always always

Project Role:

Select a project role. Use "Other (Specify)" if the desired category is not available.

Special Instructions for Multiple PD/PIs: All PD/PIs must be assigned the "PD/PI" role, even those at organizations other than the applicant organization. The role of "Co-PD/PI" is not currently used by NIH or other PHS agencies to designate a multiple PD/PI application. In order to avoid confusion, do not use the role of "Co-PD/PI."

Note on OSCs: For OSCs, enter "Other (Specify)" for the "Project Role" field, and enter "Other Significant Contributor" in the "Other Project Role Category" field.

32



What about Consultants?

Might or might not be Senior/Key Personnel:

it depends on what they are doing.

Examples:

- Hosting community events, organizing meetings, managing social media outreach – **probably not** Sr/KP.
- Analyzing data, contributing to publications, needed for their specific scientific expertise – **probably** S/KP.

Take note: If they're utilizing institutional resources, then **SUBRECIPIENT**.



If you're not sure, ask SPA

33



Some Q&A

34



Poll Question #3

Select all that are true regarding Consultants and Other Significant Contributors.

Typically, OSCs may have measurable effort but receive no compensation

Typically, Consultants have no measurable effort and receive no compensation.

Typically, OSCs have no measurable effort but may receive payments for the work they contribute to the grant.

Typically, Consultants have an hourly or daily rate for which they are paid.

OSC must NOT have any committed effort. (or receive funds)

35



Poll Question #4

Is an Other Significant Contributor Sr/Key Personnel?

A: yes, they must be Sr/KP.

36



Poll Question #5

What agreement do we need to get in place to support the work an OSC will be doing for your grants?

- a. Subaward
- b. Consulting agreement
- c. Either A or B, depending upon if institutional resources are needed
- d. Either A or B, depending upon if the institution wants to recoup F&A/indirect costs
- e. No agreement needed, (unless there are materials or data being shared; then possibly MTA or DUA)

37



Poll Question #6

Since Consultants are independent contractors, and therefore **not** faculty at subrecipient institutions, we do not need a Data Use Agreement.

True

False

I need more information

If the project is covered by HIPAA and they are receiving a Limited Dataset, then always DUA. Need more information is the best answer.

38



The presentation in one slide

	Co-I	OSC	Consultant
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Other Support	Yes	Yes	No
eRA credential	Always	Always	If Sr/KP
Grant effort	Yes (check NOFO)	Never	Never pms/cms Could be milestones
Compensation	Effort/IBS-based	“zero person months”	Daily/hourly rate

39



Let's have some discussion

What's on your mind?

Consultants

Other Sig Contributors

NIH applications

Sr/Key Personnel

Data concerns

Agreements



40



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41



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42



43



44

