

WV-INBRE Subawardee Grants Management Guidance (updated 1/12/11)

WV-INBRE subawardees may make changes to project scope, key personnel or subawardee organization. In general, all subawardees must obtain the approval of WV-INBRE Administrative Core and the appropriate research corporation (either the Marshall University Research Corporation (MURC) or the WVU Office of Sponsored Programs (WVU-OSP) for changes in (1) scope, (2) status of key personnel, or (3) subawardee organization, as defined below. Project Investigators must also provide a letter of approval for the changes from his/her mentor.

All requests must be submitted in writing to Gary Rankin in the WV-INBRE office and at least 30 days notice prior to the proposed action must be given. If the WV-INBRE Administrative Core approves the change, Dr. Rankin will notify the MURC or WVOSP and request their approval in all cases. Questions about changes may be addressed to Dr. Donald Primerano (primeran@marshall.edu).

(1) Changes in scope include any of the following actions:

- Change in the specific aims approved at the time of award.
- Substitution of one animal model for another.
- Any change from the approved use of animals or human subjects.
- Shift of the research emphasis from one disease area to another.
- A clinical hold by FDA under a study involving an investigational drug (IND) or an investigational device (IDE).
- Application of a new technology, e.g., changing assays from those approved to a different type of assay.
- Transfer of the performance of substantive programmatic work to a third party through a consortium agreement, by contract, or any other means. If the third party is a foreign component, this type of action will also require NIH prior approval.
- Change in key personnel
- Moving any amount of funds from or into the equipment category. In most cases this will also necessitate a change in indirect costs.
- Change in indirect costs. The total costs (direct + indirect) must remain the same as in the original subaward agreement
- Significant rebudgeting, whether or not the particular expenditure(s) require prior approval. Significant rebudgeting occurs when expenditures in a single direct cost budget category deviate (increase or decrease) from the categorical commitment level established for the budget period by more than 25 percent of the total costs awarded. For example, if the award budget for

total costs is \$200,000, any rebudgeting that would result in an increase or decrease of more than \$50,000 in a budget category is considered "significant rebudgeting." The base used for determining significant rebudgeting excludes the effects of prior-year carryover balances but includes competing and non-competing supplements. Example: if a subawardee moves \$5000 from supplies to travel, that would be a \$5000 change. If the total direct + indirect costs = 100,000, this would be a 5% change.

- Incurrence of research patient care costs if costs in that category were not previously approved by NIH or if a grantee desires to rebudget additional funds beyond those approved into or rebudget funds out of the research patient care category.
- Purchase of a unit of equipment exceeding \$25,000 (not in the original budget??).

(2) Change in Status of Key Personnel. Subawardees must notify the WV-INBRE Administrative Core if the PI or key personnel specifically named in the subaward agreement will withdraw from the project entirely, be absent from the project during any continuous period of 3 months or more, or reduce time devoted to the project by 25 percent or more from the level that was approved at the time of award (for example, a proposed change from 40 percent effort to 30 percent or less effort). The WV-INBRE Administrative Core and appropriate research corporation must approve any alternate arrangement proposed by the grantee, including any replacement of the PI or key personnel named in the Notice of Grant Award.

The request for approval of a substitute PI/key person should include a justification for the change, the biographical sketch of the individual proposed, other sources of support, and any budget changes resulting from the proposed change. If the arrangements proposed by the grantee, including the qualifications of any proposed replacement, are not acceptable to the Administrative Core, the grant may be suspended or terminated. If the grantee wishes to terminate the project because he/she cannot make suitable alternate arrangements, he/she must notify the Administrative Core, in writing, of his/her wish to terminate.

(3) Change of Grantee Organization. WV-INBRE Administrative Core and MURC/WVOSP prior approval is required for the transfer of the legal and administrative responsibility for a grant-supported project or activity from one legal entity to another before the expiration of the approved project period (competitive segment).

Subawardees should notify the WV-INBRE Administrative Core of all other budget changes on an annual basis. These changes include budget modifications less than 25% define above.