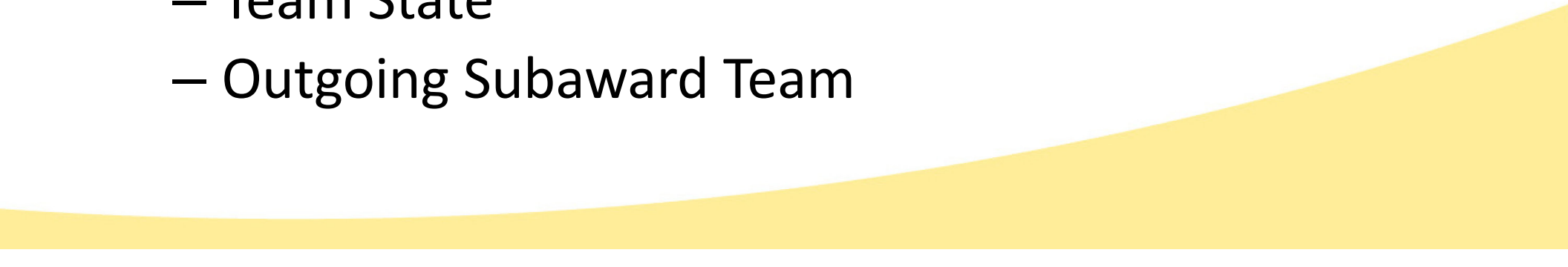# SPA Updates
SPA/SPAC Meeting

Thursday, September 11, 2025

2:00PM

SPA Agenda

- Personnel Updates
- SPA Contact Us
- Federal Updates
- Team Updates
  - Research Security Updates
  - Proposal Team
  - Grants Team
  - Incoming Contracts Team
  - Team State
  - Outgoing Subaward Team

SPA Personnel Updates

- – John Evermann, Executive Director
- – Victoria Pennacchia, Grants Administrator, Grants Team

Contact Us

For contact information and information on the responsibilities for each team please check out: https://www.umaryland.edu/spa/spa-contact-us/

Some updates to Team responsibilities (Baltimore City moved from Team State to the Incoming Contracts Team) so please check back.

SPA Reminders

Proposals

- **Proposals are supposed to be routed to SPA in FINAL form (in-progress does not count) 5 days before the deadline.**
  - If unable to meet the 5-day deadline please reach out to the appropriate team (Proposals, State, etc.) or if it has been assigned reach out to that person.
  - As PIs look for new sources of funding SPA needs time to research the submission process including the process for any new electronic systems.
  - In-progress proposal submission due dates should not be changed to the same date the proposal is routed to SPA.
  - The expectation is that proposals are submitted during normal business hours. Rare exceptions may be considered but must have prior approval from the SPA Executive Director or AVP.
- DO NOT reuse SPA signed forms
  - Sponsors might say it is okay to use forms signed by SPA from a previous submission, however SPA must review and sign again and the proposal should be submitted again through KR.
- Final copies of proposals must be submitted to SPA if SPA is not submitting.
  - Email submissions – copy the assigned SPA team member on the submission.
  - Portal/System submissions – send to the SPA team member a printed version of what has been submitted to the Sponsor.

SPA Reminders

UMB Departing Investigator

- Use the KB **Departing Investigator** form
  - For PIs transferring to a new institution
  - For PIs who retire
  - For other situations where a PI is no longer at UMB
- For existing/expiring awards, dispositions include
  - Transfer
  - Change of PI (KR routing also required)
  - Terminate
  - Expire – final reports due

SPA Reminders

Departing Investigator form (continued)

- Notifies SPAC and SPA

- Documents approvals by Chair and Dean for any action on the form

- Addresses equipment transfers

- Enter multiple awards on one form OR submit multiple forms as you determine the disposition of each award or set of awards

UMB Departing Investigator

SPA Reminders

Departing Investigator form (continued)

- For those awards that will remain at UMB under the direction of a new PI, please indicate that a KR routing is in process and provide the KR number if known.
- Instructions for completing the KB form can be found HERE

***Please submit this form as soon as you learn the PI will be departing. NIH requires notification 30 days in advance of the proposed change. ***

SPA Reminders

KR Routing Required for Change of PI

All Principal Investigator (PI) changes must be routed through the Proposal Development module in Kuali Research (KR). This update is necessary to ensure that all required certification questions are properly collected and documented.

In KR, please use the "Change in PI/Dept." proposal type. In the attachments section, please upload required sponsor documentation and/or at minimum a scope of work and the budget.

- ➢ Budget for Change in PI-not needed unless Sponsor requires it.
- ➢ Budget for Change in Dept.-the budget would include the estimated remaining balance to be transferred to the new dept.

***If the Change in PI is related to a termination, a Departing Investigator Form must also be completed.

*** SPAC will automatically set up a new award and project id when there is a Change in Department.

***The same Award and PID are maintained when the routing is a Change of PI within the same department.

New Guidance/Tool - Proposal Attachments

https://www.umaryland.edu/kuali/user-resources-and-help/attachments/

Look here ⬆ for new downloadable guides on the topic of "What needs to be attached in my KR proposal?"

- Proposal attachments by proposal submission type
- Internal attachments

Federal Updates

IMPORTANT!

If you or a PI are contacted by anyone from outside of UMB requesting changes related to a federal award, immediately share the request with Jill and Laura, copying the department chair and dean. Do not respond to requests independently.

Federal Updates

NIH

- o Other Support Training (Will be covered during Research Security Team Updates.)

- o No Cost Extensions (Will be covered during Team Grants Updates.)

- o NOAs and Multi-year Awards

- o Foreign Subawards

NIH NOAs and Multi-Year Awards

- Please keep a close eye on your NOAs. We are seeing errors (incorrect budgets) and other data entry problems. Please alert SPA (spa@umaryland.edu) if you see any issues.

- NIH is required to make a significant portion of FY25 awards as Multi-Year Funded (MYF) Awards. This means all the years are funded with the initial NOA. R01s are typically 5 years, however when issued as MYF awards, the POP will be 4 years and can be extended for one year.

NIH Foreign Subawards

[NOT-OD-25-104](NOT-OD-25-104)

"Effective with the date of this notice and until the details of the new foreign collaboration award structure are released, NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity. Additionally, NIH will no longer accept prior approval requests to add a new foreign component or subaward to an ongoing project. In all cases, NIH will allow Institutes, Centers and Offices (ICOs) to renegotiate awards, whether new, renewal or non-competing, to remove subawards to foreign entities and, where the work can be performed domestically, allow the funds to be rebudgeted for use by the prime recipient (domestic or foreign) or a domestic subrecipient. If a project is no longer viable without the foreign subaward, NIH will work with the recipient to negotiate a bilateral termination of the project, taking into consideration any need to support patient safety and/or animal welfare.

Notices of Funding Opportunities (NOFOs) that state that foreign components are allowed are superseded by this notice. NIH will revise NOFOs to reflect the new award structure."

NIH Foreign Subawards

[NOT-OD-25-130](#) - July 18th, 2025

Taking into consideration concerns for patient safety risks for ongoing projects, NIH recognized the need to identify an alternative approach for removing the foreign subawards from existing grants and cooperative agreements involving human subjects research (e.g., clinical trials and clinical research) at the foreign site. As a result, NIH Institutes, Centers, and Offices (ICOs) will have the option to renegotiate the award structure with a recipient such that foreign subawards are financially removed from the primary award and awarded as administrative supplement (i.e., Type 3) awards. Each foreign supplement award will only include funds allocated for a single foreign entity, allowing NIH better ability to track obligations to foreign entities.

NIH Foreign Subawards

What does this mean?

- If the foreign subrecipient was engaged in human subjects research, NIH may allow the subaward to continue.

- The subaward costs will be pulled out of the regular NIH award and issued as a stand-alone Type 3 (Supplement) award.

- SPAC will assign a new Award/PID for this Supplement.

NIH Foreign Subawards

What does this mean? (continued)

- SPA will issue a new child in KR for each supplement.
- Departments must request a new subaward via KB to reflect the new Type 3. (Existing subs should be terminated.)
- Both the parent NOA and the Type 3 are no longer subject to SNAP.
- No rebudgeting is allowed between the Parent and the Type 3.
- Separate FFRs will be submitted by UMB for the Parent and the Type 3.

NIH Foreign Subawards

This is interim guidance only for existing awards that included human subjects research at the foreign entity. We still expect NIH to issue a new structure for foreign participation before the end of September.

Team
Updates

Research Security Team

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Research Security Team

Federal funding agencies are posting Research Security training requirements and certifications for Covered Individuals and Senior/Key Persons, including NSF, NIH and the DoE.

- o Reference program information, NOFO, agency policies, etc.
- o Contact RS team for information re RS training requirements.

NIH Policy ([NOT-OD-25-133](#)) effective October 1, 2025: requires **NIH recipients** to provide training to all faculty and researchers identified as Senior/Key Personnel on the requirement to disclose all research activities and affiliations (active and pending) in Other Support.

- o UMB RS training, Section 2, addresses disclosures to UMB and to federal agencies using the Biographical Sketch and Current and Pending (Other) Support forms.
- o RS Team working with Grants Team on supplemental training specific for NIH disclosures
- o Information on SPA webpages
  - ▪ [NIH Other Support](#)
  - ▪ [Disclosure Information](#)

RS Team Office Hours
1st and 3rd Wednesdays 2:00pm – 3:30pm
SPA-Research_Security@umaryland.edu

Research Security Team

- Approximately **80%** compliance of those required to take the RS training pursuant to KR data of proposal submissions and award recipients.
  - Working with Departments/Schools for those non-compliant.

- **REMINDER**: Covered Individuals and Senior/Key Personnel **planning** to submit a proposal or have recently submitted a proposal, federal and federal flow through, strongly recommended to complete the UMB Research Security training by **September 15**.
  - Allows time for data entry into Kuali Research for proposal submissions
  - If training is not complete at time of proposal, proposal submission could be impacted
  - RS team to provide compliance reports, upon request

- **RAC Mentoring Session October 23, 2025**: Research Security Specialist to present on the research security international travel review process.

RS Team Office Hours
1st and 3rd Wednesdays 2:00pm – 3:30pm
SPA-Research_Security@umaryland.edu

Proposal Team

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Proposal Team Updates & Reminders

- Please remember the use of hyperlinks in NIH grants is not allowed unless NIH specifically asks for them. As in (Biosketches and Bibliography/Literature Cited), and in those two documents the Hyperlinks can only take you to NIH sites.

- When reviewing NIH applications please use the NIH-eApplication button on the S2S tab of the proposal. This will create a PDF that will make a copy of the application that will appear how NIH see the application.

Proposal Team Continued

- When reaching out to the proposal team for help please have a way for us to contact you. We find that many of the Admins do not have telephone numbers listed in the directory or in their signature line. This becomes really important on last minute submissions. If you send an email please leave a way for us to contact you back, especially on high priority items.

- Please make sure that the PIs/Key Personnel are certifying their proposals correctly. This becomes very important with proposals that the Deans Offices have given a deadline waiver on.

Proposal Team Reminders

- When a proposal is being created, please put the actual deadline that the proposal is due to the Sponsor. If it needs to be submitted earlier than that work with the Team Member, Most of the times we can work with you on that. If you find a proposal must be submitted earlier than the due date and the Team member is out, please send a message to SPA-Proposals@umaryland.edu and we will retriage the proposal.

Proposal Team Items to look forward to

- We are going to be working on a walkthrough on what is required on each of the tabs. Also included will be a list of the most common errors found on that tab and how to fix those errors. These items will be posted on our site and will be useful to anyone who works with proposals.
- Once we get the updates for when the Biosketches and the Current/Pending forms will be completed or made mandatory we will let you know.

Grants Team

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Grants Team

No Cost Extensions

- Per NOT-OD-25-14, the Automatic NCE Link was reenabled.
- However, we have noticed that some projects with less than 30-60 days remaining until project end are not available for automatic extension.
- Historically, the automatic extension link was available 90 days before the project period end date and closed at midnight on the last day of the project period.
- Team Grants is working with each individual GMS when this occurs to resolve the issue. Sometimes they will issue the automatic NCE via a NoA with an email request from the AOR. However, submission via the prior approval module may still be necessary where NCE uploads will need to be provided.
- SPA has been told that the NIH is aware of the issue and that they are working to resolve the availability of the automatic extension link up until the project end date.

Grants Team
No Cost Extensions Continued

- Certain awards are not available for an automatic first extension.
- Please use the [NIH No Cost Extension Uploads](#) document as a reference when preparing to submit a second or subsequent No Cost Extension, which will be submitted through the eRA Commons Prior Approval Request Module.
- **To allow time for processing, all requests must be received in SPA 10 days before the sponsor deadline.**
- NCEs and all prior approval requests:
  - ➤ We have multiple reports from NIH officials stating that prior approval decisions and responses will be delayed due to a major push to get all federal fiscal year obligations issued, e.g., new and continuation funding. Many have shared they will be reviewed requests after 10.1.
  - ➤ If an NCE response is still pending for your award, do not complete the closeout paperwork; we will respond to any closeout paperwork requests by stating that an NCE request is under consideration.

Grants Team

NIH Enhanced Post Award Review-IRB

•Please be sure that IRB protocols are submitted via CICERO and once approved, that they do not expire (if a continuing review is required).

- Some basic information for your knowledge:
    - All human research must be submitted through **CICERO**, UMB's electronic IRB system: cicero.umaryland.edu.
    - You must **not begin any human research** until IRB approval or exemption determination is received. *Note that JIT requests require approved protocols.*
    - If you're unsure whether your activity qualifies as human research, you can request a determination from the **Human Research Protections Office (HRPO)**
    - **Amendments** to approved protocols (e.g., changes in procedures, personnel, consent forms) must be submitted via CICERO.
    - Minor changes may qualify for **expedited review**, but significant changes may require **full board review**.
    - All modifications must be approved **before implementation**

Grants Team
NIH Enhanced Post Award Review-IRB (continued)

- All investigators and research staff must complete:
  CITI Human Subjects Training
  HIPAA 125 and HIPAA 201 Training

- IRB approval will be withheld until all required training is verified.

- A single IRB must be used for multi-site studies.

- **Contact the HRPO with questions.**

HRPO@umaryland.edu
HRPO Office Hrs.
2nd Monday of every month
from 12n to 1pm

Very Helpful UMB HRPO Link with Policies and Resources you can share with Investigators

Grants Team
NIH Enhanced Post Award Review-Unobligated Balance

- At the time of the RPPR and/or during a No Cost Extension prior approval request.
- At the time of the RPPR, be sure to answer Section G.10 a.-c. in an informed way.
  - ➢ Review the balance in Quantum Analytics and use the UMB RPPR Checklist as a guide. Carryover calculation examples are included. RPPR-Review-Checklist-063025
- Note that even when there is automatic carryover, any carryover of 25% or more must be reported and remember that anything that the GMS cannot see in the PMS may trigger a question in response to the RPPR, where the GMS may request a spending plan or revised budget from the PI. Use Section G.10b. and c. to provide an explanation for why there are extra funds (G10b) and how we intend to spend it (G10c).
- Use Section F. to explain significant challenges and delays that can support the explanation you provide in G10b.

Incoming Contracts Team

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Incoming Contracts Team

IMPORTANT REMINDERS

Use **SPA-Contracts@umaryland.edu** to:

- **Email us**. We receive and reply to emails via SPA-Contracts@umaryland.edu. ***Do not*** use SPA-Contracts-Shared-Services mail to send request or to communicate with the SPA contracts team.

- **Request electronic signature**. For signature portals and links send or have link requests sent to SPA-Contracts@umaryland.edu and please be sure to reference the related Kuali Research or Kuali Build #

- **Provide as authorized signatory email address**. To prevent delays, do not use the individual signatory's email address. Authorized representative email address should be entered as SPA-Contracts@umaryland.edu.

Incoming Contracts Team

IMPORTANT REMINDERS

For Unfunded Agreement Requests

- **Route NEW requests in KR**

- **Route RENEWAL/EXTENSION in KB**
  - Use assigned Kuali Award ID# to submit unfunded agreement renewal/extension in Kuali Build (KB). Contact SPA contracts team if you

- **Include *updated* version of Unfunded Agreement Questionnaire.**
  NOTICE: SPA will kick-back requests with older versions of questionnaire. NOTE: *Another Updated version coming soon!* https://www.umaryland.edu/media/umb/ord/documents/spa/Unfunded-Agreement-Questionnaire.pdf

- **Include a SOW**. Examples of information include: Objectives, purpose of the work performed by party(ies), or a general description of the actions to be performed by each Party and possibly the anticipated results.

- **Provide updated compliance**

Incoming Contracts Team

IMPORTANT REMINDERS

Unfunded Agreement Requests cont'd - **Additional reminders for DUAs:**

- **Include description of data and data type on unfunded agreement questionnaire.** The UMB PI or study team should provide sufficient information that each Party

- **Secured Research Environment (SRE)**. To ensure that UMB can accurately attest compliance with **NIST SP 800-171 - Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations**, all projects that involve access to NIH Controlled-Access Data Repositories must either utilize the UMB SRE which has already been certified as compliant with NIST SP 800-171, (Secure Research Environment; for more information and guidance for UMB SRE for UMB faculty , please see: https://www.umaryland.edu/cits/services/secure-research-environment-guidebook/; or undergo a NIST SP 800-171 assessment and implementation plan within 90 days of the start of the project. More information including information on REDCap SRE; see https://www.umaryland.edu/ictr/investigator-resources/ictr-informatics-core-services/index.php

- **Data Access or Repository**. Requests for Data access (e.g., NIMH, dgGaP, DAC, DUC, UK Biobank, etc.) require all same routing and submission to SPA requirements. What to upload? Upload the download agreement from online portal or the request email with instructions for approval.

Incoming Contracts Team

IMPORTANT REMINDERS

DON'T FORGET . . .

Compliance Information

- **Update compliance information.** Provide updated IRB or IACUC information in KR routing. Is your routing a Continuation but Compliance tab is set at "Pending" is this correct? If not, update. If so, provide explanation.

- **Relying on external IRB.** Provide both the up-to-date external IRB information and the UMB HRPO information. *REMEMBER:* External IRBs must be disclosed and reviewed by UMB HRPO.

Contracts related KR routings

- **Mark attachments, "Final".** This is required to be done by department and confirms uploaded attachments are the final document to be reviewed.

- **Include all attachments**. Are attachments referenced in the agreement? They should be included with the Agreement or uploaded in the routing.

- **Scope of Work**. KR routings should always have a scope of work.

- **Internal forms.** Upload required internal forms (e.g., unfunded agreement request questionnaire)

Incoming Contracts Team

WE ENCOURAGE YOU TO ATTEND

The SPA contracts team is available for your questions during SPA Office hours the 2nd and last Monday of every month

Come join us!!

Team State

TEAM STATE

1- If a proposal deadline date needs to be changed, the department needs to send an email to Team State indicating the new date, in addition to changing the date in KR. Notification to Team State is especially needed if deadline date changes are made after the original deadline date has passed.

2-If a sponsor has their own submission portal/system, (ie AHA, Tedco), a KR proposal submission still needs to be created and fully routed to SPA. SPA KR proposal approval should be completed prior to the Sponsor system submission.

3-As a reminder, to assist with the KR vs KB question re routing to SPA, we have a helpful tool available at www.umaryland.edu/spa/award-management/award-modification/ "Should I use the award modification form"

4- Please note that agreement review and signature could take three weeks or more to process. Although many state institution agreements are on templates and can be processed fairly quickly, many are not and these take time.

Outgoing Subaward Team

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Outgoing Subaward Team

Coming Soon:

- KB for Subaward closeout
- Annual Risk Assessment
- Brown Bags

- <u>Reminder:</u> Please use the Sub Commitment Form on SPA's website so that you have the most recent version. The SCF is only required for "New" Requests.