



UNIVERSITY *of* MARYLAND  
BALTIMORE

# SPA Updates SPA/SPAC Meeting

Tuesday, June 9, 2026

2:00PM

# SPA Agenda

- **Personnel Updates**
- **General SPA Updates**
  - Upcoming SPA Team updates
  - Early July Deadlines
  - New KB Forms/Updates to existing KB forms
  - KR updates
  - Other
- **Team Updates**
  - Research Security
  - Proposal Team
  - Federal Grants Team
  - Incoming Contracts Team
  - Team State
  - Outgoing Subaward Team

# SPA Personnel Updates

- Andrew Cromwell from Subs to Incoming Contracts Team
- Team Updates early/mid-July 2026-->
  - Simplify work flow (proposals/agreements)
  - No longer use Team State email – only for sponsors as it transitions away
  - Some tasks from Proposal Team to other teams
  - Allow for greater focus on proposals

**Please utilize the Team Email Addresses.**



<https://www.umaryland.edu/spa/spa-contact-us/>

# Upcoming Changes - SPA Team Functions

Proposals	Federal Grants	Incoming Contracts	Outgoing Subawards
All Proposal/JIT activities	Takes over when a direct Federal Grant/Cooperative Agreement NOA is received.	Reviews/Negotiates all direct Federal Contracts and Agreements for all other sponsors (contracts, grants, letter agreements, etc.)	Responsible for outgoing subawards (money to another institution) under all awards
<ul style="list-style-type: none"> <li>Review/Submit proposals for all sponsors</li> <li>Just-in-time actions</li> <li>Post Submission Materials actions</li> <li>Proposal Withdrawals</li> </ul>	<ul style="list-style-type: none"> <li>Process temp account requests for direct Federal grants/cooperative agreements</li> <li>Process Federal grant/cooperative award actions to SPAC</li> <li>Post Award actions for direct Federal Grants/Cooperative Agreements (NCEs, PI changes, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Process temp account requests for non-Federal awards and Federal contracts/subawards</li> <li>Reviews/Negotiate/Processes/ Awards and Modifications for everything except direct Federal grant/cooperative agreements</li> <li>Assists Proposal Team with RFP Review</li> </ul>	<ul style="list-style-type: none"> <li>Process outgoing subaward actions and mods to other entities</li> <li>Initial and annual subrecipient risk assessments</li> <li>FFATA reporting</li> </ul>

# Early July 2026 Proposal Deadlines

- July 4th holiday (observed July 3rd), and a one-time additional UMB holiday on July 6th....AS A RESULT....:
- Proposals for NIH July 5 AND ALL others due July 3, 5, and 6:
  - **ROUTED TO SPA AND IN FINAL FORM BY June 26, 2026**
    - SOM Internal Deadline remains June 24, 2026 for July 5 NIH
    - Other schools, consult your leadership as applicable
- Late Submissions
  - If a proposal is routed to SPA in final form after June 26, every reasonable effort will be made by SPA staff to review, resolve issues, and submit the proposal by COB July 2, 2026.

[The above was communicated to the RAC on June 1, 2026]

# SPA Forms

- Address Requests (add a non-UMB person, performance site, sponsor or subrecipient in Kualu Research)
- User Requests (Add, update, or remove roles/units in Kualu Research, update Approvers)
- MOVING TO KUALU BUILD as of tomorrow (6/10) - new links on the SPA Forms website (and we'll send an email to RAC)

# Temporary Project Request

- This form is ready for pilot testing.
- A few invited departments will begin using the form before we open to campus.
- Look for a RAC email with the link when we are ready for everyone to use the form
- We anticipate making the form mandatory beginning July 1
- A routed, approved KR Proposal is required for submission of the KB Temporary Project Request. After July 1, temporary requests will no longer be accepted as part of a KR Proposal.

# Outgoing Subs form/process update

KR Award number:

- Begin entering the –00001 record in all cases
  - Example: 316888-00001
- For New subawards, Approved Subawards will be added to the –00001 record. (There will be a transition period for Approved Subawards data entry.)

# KR Internal Attachments Update

- Placeholders are no longer needed on the Internal Attachments tab

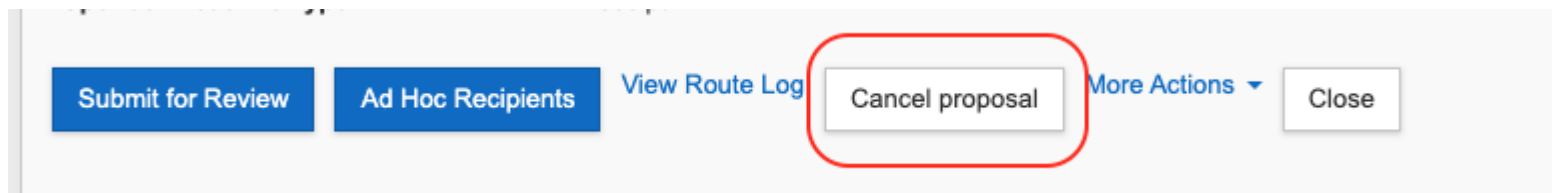
Thanks for your past cooperation. We will be updating on-line instructions soon.

Thank You!!  
A handwritten signature in black ink that reads "Thank You!!". The text is written in a cursive, slightly slanted style. Below the text are two parallel horizontal lines. To the right of the bottom line is a simple smiley face icon consisting of a circle with two dots for eyes and a curved line for a mouth.

# KR: Canceling or Deleting a Proposal

Did your PI abandon a proposal? Feel free to Cancel it

- If you can edit the proposal, you should have the Cancel button
- Cancel means the proposal is removed from the Dashboard, but you can view or copy it
- Delete means it's gone. Only "In Progress" proposals can be deleted. Only SPA can Delete (contact Janet or Greg).



# KR Proposal Clean Up

- PLEASE DO NOT COPY PROPOSALS THAT ARE MORE THAN 6 MONTHS OLD!!
- We have been canceling old proposals.
- This will help avoid issues with rates, questionnaires, etc.



# 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.**

# SPA Training Updates

- SPARKS – Sponsored Programs Administration Research and Knowledge Sessions
  - One-hour presentation + Q&A on a variety of topics
  - Open to all via Zoom on the 3rd Tuesday of each month at 9:00 am
  - June 16th: Limited Submissions
  - Slides & recordings available on the website  
<https://www.umaryland.edu/spa/research-administration-training/sparks/>

**COMING SOON!** ESP – Essentials of Sponsored Projects - New curriculum focused on the sponsored project lifecycle

# Reminder: RAC Listserv

- SPA and SPAC use the RAC Listserv for important communications.
- Email [CGEPPI@som.umaryland.edu](mailto:CGEPPI@som.umaryland.edu) to be added to the listserv
- Important SPA communications are archived here: <https://www.umaryland.edu/spa/spa-notices-archive/>  
- use the navigation menu to find the topic and date

# Team Updates

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# Research Security Team



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# Research Security

- [NSF RST Consolidated Training Module 2026-2027](#)
- RS Website
  - [Research Security Training Frequently Asked Questions \(FAQs\)](#)
  - [Federal Agency Risk Assessment/Risk Mitigation Matrices](#)
- Completion of research security training required within 12 months prior to all sponsored proposals submitted through SPA. Training is required when:
  - No date entered for "Date Submitted" or
  - If the respective due date for the proposal reviewed exceeds 12 months after the "Date Submitted" date.
- Check research security training completion in Quali Research

RS Team Office Hours

1st and 3rd Wednesday 2:00pm – 3:30pm

[SPA-Research\\_Security@umaryland.edu](mailto:SPA-Research_Security@umaryland.edu)

# Research Security

- Check research security training completion in Kualu Research
  - Via Common Tasks

The screenshot shows the Kualu Research interface. On the left, the 'Common Tasks' menu is highlighted, with 'Person Training' selected. The main area displays a search form for training completion. The form includes fields for 'KC Person' (24990194), 'Training' (UMB Research Security), and various date fields. A table below the form shows one training record. A callout box on the right provides a magnified view of the search form fields. A second table at the bottom shows the same record with red 'X' marks over the 'Actions' and 'Followup Date' columns.

**Common Tasks Menu:**

- Dashboard
- Search Records
- Common Tasks**
- All Links

**Quick Links:**

- Action List
- Doc Search
- Current & Pending Support
- Person Training**
- View S2S Submissions
- Locks

**Search Form Fields:**

- KC Person: 24990194 (Brandal, Stephanie M.)
- Training: UMB Research Security
- Date Requested From: [ ]
- Date Requested To: [ ]
- Date Submitted From: [ ]
- Date Submitted To: [ ]
- Date Acknowledged From: [ ]
- Date Acknowledged To: [ ]
- Followup Date From: [ ]
- Followup Date To: [ ]
- Score: [ ]
- Comments: [ ]
- Is Active:  Yes  No  Both

**Training Record Table:**

Actions	Person Training Id	KC Person	Full Name	Training Number	Training	Date Requested	Date Submitted	Date Acknowledged	Followup Date	Score	Comments	Is Active
edit copy delete	300850	24990194	Stephanie M. Brandal	1	UMB Research Security		05/13/2025 12:00 AM		03/13/2024 12:00 AM			Yes

**Callout Box Fields:**

- KC Person: 24990194 (Brandal, Stephanie M.)
- Training: UMB Research Security
- Date Requested From: [ ]
- Date Requested To: [ ]
- Date Submitted From: [ ]

**Bottom Table:**

Actions	Person Training Id	KC Person	Full Name	Training Number	Training	Date Requested	Date Submitted	Date Acknowledged	Followup Date	Score
edit copy delete	300850	24990194	Stephanie M. Brandal	1	UMB Research Security		05/13/2025 12:00 AM		03/13/2024 12:00 AM	

# Research Security

- Check research security training completion in Kualu Research
  - Via Proposal

KUALI RESEARCH

Kuali Research

Proposal Development

Proposal: # 123456  
PI: John Smith

Document  
Doc Nbr:  
S2S Con  
Initiator:  
Status: A  
more...

Data Validation (off) Print Medusa Budget Versions

Key Personnel

Search for and add key personnel

Basics

Personnel

John Smith (Principal Investigator) (Certification Completed and Answered By 67390062 - 09/09/2021 04:57 PM)

Details Organization Extended Details Degrees Unit Details **Person Training Details**

Person Training Details

Show 10 entries

Training Number	Training	Date Requested	Date Submitted	Date Acknowledged	Followup Date	Score
1	UMB Research Security		09/25/2025 12:00 AM		07/25/2028 12:00 AM	

Showing 1 to 1 of 1 entries

Xuefang Cao (Co-Investigator) (Certification Completed and Answered By 67390062 - 09/09/2021 05:46 PM)

Person Training Details

Show 10 entries

Training Number	Training	Date Requested	Date Submitted	Date Acknowledged	Followup Date	Score
1	UMB Research Security		09/25/2025 12:00 AM		07/25/2028 12:00 AM	

# Proposal Team



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# Proposal Team

## BioSketch Lessons Learned from June 5<sup>th</sup> and Other Reminders

1. All Senior/Key people will need to create an ORCID ID before going into SciENcv to create the biosketch.
2. Both NIH and NFS Biosketches Applicants will be required to use Science Experts Network Curriculum Vitae (SciENcv) for preparing and certifying NIH Biosketch and Current and Pending (Other Support) forms to produce **digitally certified PDFs** for use in application submission.
3. And that key person must verify that their Biosketch is linked properly.

# Help when creating your New Biosketches

- No page limit, but strict entry and character limits for individual sections to control the length of the document.
- All individuals must personally certify that their generated biosketch is accurate and complete
- New forms has five certifications, sign and date
- Commons Form and the NIH Supplement Form, both are required

# Biosketch Errors Troubleshooting

- Make sure that you only have one NCBI account and one eCommons account
- More than one? Call the NCBI Helpdesk, ask them to merge the accounts.
- Verify that you have linked the ORCID ID into the SciENcv, My NCBI and eCommons Profile.
- Verify that the Key Persons Email is the same in ORCID, My NCBI and eCommons.
- Verify that there are not any pending Publications on the Biosketch.

# Biosketch Errors: IDs not linked or PDF flattened

- No page limit, but strict entry and character limits for individual sections to control the length of the document.
- All individuals must personally certify that their generated biosketch is accurate and complete
- New forms has five certifications, sign and date
- Commons Form and the NIH Supplement Form, both are required

# Biosketch Troubleshooting: Test Tips

Three options to check your Biosketches.

- Create a TEST ASSIST proposal and attach the Biosketch.
  - You will have to input a bit of information and then Validate the component.
  - Delete out the info, then you can test the next biosketch the same way.
  - This will show you some of the errors and/or warnings.
- Add the Biosketch to a pending JIT entry or a pending RPPR (remember to remove before submission)

# Two Common Errors

Form Name	Validation Message
RR_KeyPersonExpanded	The ORCID ID entered in the Biographical Sketch Common Form for Taylor, Rodney does not match the ORCID for any eRA Commons users personal profile. An ORCID identifier, linked to their eRA Commons account, is required for all Senior/Key Personnel at the time of application with receipt dates starting on January 25, 2026 <a href="https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-018.html" target="_blank">(NOT-OD-26-018)</a>. (005.53.6)

The above error means the eRA Commons profile and ORCID are not linked properly. Please have the individual verify that the accounts are linked properly.

Type	Form Name	Validation Message
Error	RR_KeyPersonExpanded	The grantor agency requires the use of SciENcv to produce the Biographical Sketch Common Form attachment for this application. The Senior/Key Person Shapiro, Paul does not have a Biographical Sketch Common Form attachment meeting this requirement (<a href="https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-018.html" target="_blank">NOT-OD-26-018</a>). (005.53.4)

The above error means there is an issue with the format of the biosketch, the required digital certification is missing. Please have the individual regenerate the biosketch. Do not use the “preview” version that is generated.

## Reference: Further Resources - New Biosketches

- Frequently Asked Questions:  
<https://grants.nih.gov/faqs#/common-forms-biographical-sketch-current-pending-support.htm?anchor=57887>
- SciENCv: <https://www.ncbi.nlm.nih.gov/sciencv/>
- NIH's Implementation of Commons Forms for Biosketches and Current and Pending Support NOT-OD-26-018:  
<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-018.html>
- Announcement of Upcoming System Enforcement of Commons Forms and the End of NIH's Leniency Period NOT-OD-26-079: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-079.html>
- Link ORCID ID  
[https://era.nih.gov/erahelp/commons/PPF\\_Help/8\\_2\\_orcid.htm](https://era.nih.gov/erahelp/commons/PPF_Help/8_2_orcid.htm)

# Proposal Reminder: Appendices & General

- Proposals recently rejected by NIH for having an appendix that did not meet NIH criteria. Appendices allowed are:
  - Blank Data Collection Forms, Surveys and Questionnaires; Simple lists of Interview Questions, blank Consent & Assent Forms.
  - There may be other items allowed that will appear in the Opportunity Announcement.
  - Read Opp Announcement carefully.
- Use the correct date that the proposal is due to the sponsor. If items are needed earlier still leave the real Due Date and then work with the person who is assigned to the proposal to get the proposal completed earlier and the needed forms signed.
- F&A or Routing Waivers? Ensure uploaded into the internal attachment section of the proposal.
- **Please note info on Late Applications in Slides that follow for reference**

# Reference: Late Applications

## NOT-OD-26-064 - Update of NIH Late Application Submission Policy and the End of Continuous Submission

- End on Continuous Submission – Continuous Submissions will be allowed up until Aug 10, 2026. After that point continuous submissions will be under the Late Application Submission Policy.
- Updated Late Application Submission Policy - NIH only accepts late applications in limited situations and considers each late application for acceptance on a case-by-case basis. Decisions are based on the cover letter explanation, the funding opportunity, and the completed submission date. Your cover letter is only seen by NIH staff who need the information for referral or review decisions. We do not share cover letters with peer reviewers or include them in the assembled e-Application seen by reviewers and general NIH staff.

## Reference: Late Applications (cont.)

- You may submit during the late application period if all the following are true:
- One or more of the PD/PIs listed on the application encountered extenuating circumstances that led to the missed deadline
  - We don't accept late applications due to situations involving individuals other than a PD/PI (e.g., authorized organization representatives (AORs)/signing officials (SOs), senior/key personnel, other significant contributors, mentors/sponsors, co-investigators, collaborators, consultants, project or core leaders in a multi-component application)
- The PD/PI's extenuating circumstances are documented in the cover letter submitted with the late application

# Reference: Late Applications (cont.)

- Your application is in response to a program that allows late submission
  - We will not accept late submission for
    - Fellowship (e.g., F30, F31, F32, F33, F99/K00) and
    - Small Business (e.g., R41, R42, R43, R44, SB1, UT1, U44) applications which have the shortest processing time prior to review
    - Collaborative International Research applications (e.g., PF5, UF5)
    - Any funding opportunity that states in the Key Dates section that late applications will not be accepted
  - Late submissions are considered for all other programs

# Reference: Late Applications (cont.)

## NIH Review Service

You may also submit within the late application period, if within four calendar weeks before or after the due date, any PD/PI named on the application participates in:

- An NIH peer review study section or special emphasis panel
- An NIH Board of Scientific Counselors, Program Advisory Committee, or an NIH Advisory Board or Council
- This specific review service is the only pre-authorized reason for a late submission (i.e., automatically accepted once review service information provided in the cover letter is confirmed). Other types of NIH activities and services for other federal agencies or private organizations are not acceptable reasons for late submission.

# Reference: Late Applications (cont.)

## Submitting a Late Application & Cover Letter

- Submit your application as soon as possible. We consider your submission time as a factor when evaluating your case.
- You must document your situation in the Cover Letter attachment on the SF424 R&R form submitted with your late application. Clearly explain the reason for the delay (including delays for qualifying NIH review service). NIH receipt and referral staff use the cover letter to evaluate whether your situation warrants late application acceptance. While the reasons for late application submission are sometimes personal in nature, specific information about the timing and cause of the delay should be provided so an informed, objective decision can be made. For example, in the case of sudden, acute, severe illness, the timing/onset and severity should be explained.

# Grants Team



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# Grants Team

- **REMINDER:** Within the Research Performance Progress Report (RPPR). ALL Senior/key personnel must certify annually to their participation or non-participation in an MFTRP by uploading a certification statement in Section G.1 of the RPPR.
- SPA has developed a form to collect these certifications for senior/key personnel at the RPPR stage. This form can be found here: [https://www.umaryland.edu/media/umb/ord/documents/spa/NIH-RPPR-MFTRP-Certification\\_Fillable.pdf](https://www.umaryland.edu/media/umb/ord/documents/spa/NIH-RPPR-MFTRP-Certification_Fillable.pdf)
- These forms must be flattened .pdf files, named with the convention MFTRPcert\_PIname, digitally signed, and uploaded separately.
- IF the Key Person uploaded their Other Support document in Section D. Participants, the MFTRP form is not needed.

# Grants Team

- An updated “UMB RPPR Checklist” has been posted to include the changes in the January 2026 RPPR Instruction Guide. [RPPR Instruction Guide January 2026](#)
- A guidance document to calculate the unobligated balance to answer G.10 a. in the RPPR has been created by the SPA Grants Carryover Spreadsheet Work Group.
- Both documents may be found on the [UMB Federal RPPR Webpage](#)

# Grants Team

- **NIH Notice Reminders**

- All prior approvals must be submitted via eRA Commons. This does not include the NIH automatic NCE link for eligible awards. See [NOT-OD-26-026](#). If you have questions about how to prepare a prior approval request, please contact SPA Grants (upload guidance from SPA is available).
- Remember that NIH RR or PHS budget forms must be used. PHS forms are preferred by the NIH for post award prior approval submissions, unless revisions related to a Type 3 are being requested.
- The addition of a new domestic subrecipient must be approved by the NIH by submitting an NIH prior approval request. [NOT-OD-26-062](#)

# Grants Team

- The **2026** updated version of the Other Support form must be used because it includes the updated research security certification.
- Instructions for the PI to convert the 2025 version to the 2026 version:
  - Go to MyNCBI SciENcv [Creating SciENcv Documents](#)
  - Create a new document
  - Choose Other Support
  - When prompted for a data source, choose "use an existing document in SciENcv. "
  - Choose your 2025 OS form to populate the data into the new form.
  - Check for accuracy and certify

# Grants Team

- Foreign Component Definition-Foreign collaborations are highly scrutinized at the moment, but the definition of foreign component has not changed. Review NIH's new Notice [NOT-OD-26-084](#)
- "The performance of any significant scientific element or segment of a project outside of the United States, either by the recipient or by a researcher employed by a foreign organization, whether or not grant funds are expended. Activities that would meet this definition include, but are not limited to:"

# Grants Team

## Foreign Component Definition Continued...

- the involvement of human subjects or animals at a foreign site
- extensive foreign travel by recipient project staff for the purpose of data collection, surveying, sampling, and similar activities
- any activity of the recipient that may have an impact on U.S. foreign policy through involvement in the affairs or environment of a foreign country
- collaborations with investigators at a foreign site anticipated to result in co-authorship
- use of facilities or instrumentation at a foreign site
- receipt of financial support or resources from a foreign entity.

Foreign travel for consultation is not considered a foreign component.

**This is not an exhaustive list. Please contact SPA-Grants @umaryland.edu if you are unsure.**

# Grants Team

## NIH STATUS INQUIRIES

- **Inquiries requesting the status of NIH NoAs and Prior Approval Requests** should be well justified and made within a reasonable time after the submission of the annual RPPR and/or prior approval request.
  - For example, two weeks after the submission of the RPPR or prior approval request submission is too early.
- NoAs are often issued up to the start date of the next budget period and sometimes after, and prior approval requests may take months before final approval if provided.
  - If there are extenuating circumstances that may impact the issuance of the award that you become aware of, please share with SPA Grants so SPA Grants may assist the PI and dept. if needed.
- NIH is delayed in reviewing prior approval requests and issuing awards.
  - To maintain a considerate and measured approach with status inquiry checks to the GMS, please contact SPA Grants before sending an email to the GMS.

# Grants Team

- **Ways to help expedite the issuance of the next year's funding:**
  - Ensure publications are compliant
  - Submit prior approvals early
  - Review Other Support documents to ensure compliance
  - Avoid significant carryover of the unobligated balance
  - Request subaward invoices and technical updates early (consider using the [UMB RPPR Subrecipient Progress Report Form](#) )
  - Address extenuating circumstances as soon as possible: Example-request to revise Specific Aims and Abstract
  - Respond to Progress Report Additional Materials Requests (PRAM) as soon as possible
  - Reach out to [SPA-Grants@umaryland.edu](mailto:SPA-Grants@umaryland.edu) when you need guidance.

# Grants Team

- Please do not route RPPRs to Greg Sorensen.
- These are reviewed by the SPA Grants Team and the PI will have received a courtesy reminder from the SPA Grants Team member that is assigned to review their RPPR.
- Please contact [SPA-Grants@umaryland.edu](mailto:SPA-Grants@umaryland.edu) if you or the PI do not know who will be reviewing and submitting your RPPR.
- IF the PI has been asked to revise public facing documents, such as the Specific Aims, Abstract/Summary, or Public Health Relevance Statement/Narrative, please share this request with SPA Grants immediately. We now have significant feedback from the NIH regarding their expectations and how to complete these revisions; therefore, SPA guidance is supportive and will help prevent delays. All of these submissions must be submitted by the AOR to the NIH.
- When submitting the Departing Investigator Form, please use **one form** to include the PI's entire portfolio of Active Awards.

# Incoming Contracts Team



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# SPA Contracts Updates

- Andrew Crowmell joins SPA Contracts!
- Turnaround times should be back to normal to requests as we are fully staffed.
- Catching up on our backlog of KR Award ID# set up for unfunded agreements. Contact [SPA-Contracts@umaryland.edu](mailto:SPA-Contracts@umaryland.edu) if you need a KR Award ID# in order to submit a MOD in KB Award MOD
- Focused on FY 26! - team is focused on finalizing & getting executed agreements with start dates for FY26. Additionally, seeking to obtain and execute agreements that will finalize TEMP
- Look for our upcoming articles in the SPA Express!!

# SPA Contracts

## *Need SPA Contracts review?*

### **Frequently asked:**

- "I have an agreement, but it doesn't have a KR Award ID# yet?"
  - Submit via email to [SPA-Contracts@umaryland.edu](mailto:SPA-Contracts@umaryland.edu)
- "I have an agreement or amendment but previously I submitted a TEMP?"
  - Submit via KB Award MOD
- "I need to request prior approval for NCE?"
  - Submit via KB NCE
- "I have an amendment that authorizes a NCE?"
  - Submit via KB Award MOD
- "I need to process a NCE but don't need sponsor approval?"
  - Submit via KB NCE
- "I have an unfunded MOD?"
  - Submit via KB Award MOD

# SPA Contracts

- *Did you know?*
- If you have a continuing project but the sponsor issues a new agreement, that agreement will be assigned a new KR Award ID#
- If the award you've received is not covered by a previous Kualu Research (KR) routing, you must submit that award agreement in KR
- Any request related to a contract/agreement that requires institutional sign-off must be submitted via KB Award MOD (e.g., closeout, COI, etc)
  - But, if it is a change in scope, personnel or project, it must be submitted via KR

# SPA Contracts

## DATA INTEGRITY

The SPA contracts team seeks to support the data integrity of the actions and assignments they are responsible for reviewing in an effort to streamline project and award information for lifecycle support and for accurate records and reporting

Based upon the action assigned, an assessment checklist is completed by assigned team member to assist in accurate data/information across systems.

We complete these assessments on:

- *Funded*
- *Unfunded*
- *Pre-Award*
- *Post-Award*
- *Compliance*
- **WORK WITH US!** Please ensure your requests/submissions have accurate and up-to-date information

# SPA Contracts

## EXAMPLES OF WHAT DATA IS ASSESSED FOR DATA INTEGRITY

- ✓KR Award information
- ✓Period of Performance
- ✓Fiscal year information & funding
- ✓Pre & post award information
- ✓Project information (for accuracy; e.g., title, sponsor,)
- ✓Project compliance info (e.g., IRB, IACUC, Data, COI, waivers)
- ✓Project type (proposal type)
- ✓Award type
- ✓Activity type
- ✓Subaward information/allowance
- ✓KR routed year and overall budget
- ✓Agreement information (obligation dates, associated agreements, restrictions/allowances (e.g., carryforward, NCE)
- ✓Sponsor point of contact information
- ✓Prime funder / prime agency information
- ✓Award Identifiers
- ✓Indirect cost rate

<https://www.umaryland.edu/kuali/user-resources-and-help/proposal-entry/activity-types/>

<https://www.umaryland.edu/kuali/user-resources-and-help/proposal-entry/proposal-types/>

<https://www.umaryland.edu/kuali/user-resources-and-help/proposal-entry/anticipated-award-type/>



# Team State

**\*\*Please continue to monitor RAC emails for changes to Team State and related updates\*\***

- You must always create and route a KR proposal, even if the sponsor has their own submission portal.
- The institution name is:

University of Maryland, Baltimore

# Outgoing Subaward Team



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- U.S.-based entity performing programmatic work
- Subject to NIH Grants Policy Statement
- Different from vendor (procurement)
- UMB retains full accountability.

# New NIH Requirement

**Effective June 1, 2026**

**Notice Number:** NOT-OD-26-062

**Release Date:** March 25, 2026

- NIH now **REQUIRES** prior approval to add a new domestic subaward post-award
- Applies if the subaward was **NOT** in the original, peer-reviewed application

# Domestic Sub Prior Approval

## Common Issues Driving This Policy Change

- Incomplete subrecipient documentation at proposal
- Delays in issuing subawards
- Misclassification of vendors
- Weak or missing risk assessments

## Best Practices

- Treat subrecipient package like a **mini proposal**
- Use **checklists at department level**
- Engage [SPA-Grants@umaryland.edu](mailto:SPA-Grants@umaryland.edu)
- Ensure PI understands:
  - Scope clarity
  - Oversight responsibility

# When Prior Approval Is Required

- New subrecipient not included in the original proposal
- Work represents a change in scope, such as:
  - Adding new aims or activities
  - Shifting key work to another institution
- Rebudgeting funds into a subaward that exceed NIH thresholds
- Adding or changing a key person at the subrecipient
- Moving work from UMB to a subrecipient

# When Prior Approval NOT Required

- Sub included and approved in proposal
- No change in scope
- Routine rebudgeting within limits
- Still must document internally

If the sub was NOT in the proposal → **STOP**  
and email SPA-Grants to initiate prior  
approval request before work begins.

# Request for Prior Approval

Prior approval requests should be made 30 days in advance of the proposed change. SPA Grants submits the request via the eRA Commons Prior Approval Module.

For NIH: Departments email the following required documents to the Grants team:

- Sub Scope
- Sub Budget
- Revised UMB Budget incorporating the Sub
- Justification Document incorporating the effective date, reason for the addition, and confirming if the scope will change.
- Human Subjects Certifications
- New Sub PI Biosketch
- New Sub PI Other Support

# Bottom Line

- **This is a major NIH policy shift (2026)**
- Focus = **transparency, oversight, and accountability**
- UMB must ensure:
  - No unauthorized subawards
  - Full documentation
  - Audit-ready compliance

# NIH Prior Approval Decision Tree (2026)

**START:** Need to add a subrecipient?

Was the sub included in the original NIH proposal?

○→ **YES**: No prior approval typically required (if no scope change)

○→ **NO** ↓

○→ **NO**: Likely vendor – follow procurement rules

○→ **YES** ↓

# NIH Prior Approval Decision Tree (2026) - Continued

Does this change WHO, WHAT, or WHERE of the project?

○→ **YES:** NIH PRIOR APPROVAL REQUIRED

○→ **NO:** Consult SPA Grants at [SPA-Grants@umaryland.edu](mailto:SPA-Grants@umaryland.edu) for confirmation

**FINAL RULE:** If NOT in proposal or NOA → **STOP**

The PI, following school and/or department procedures, submits the request to SPA Grants for prior approval. The sponsor must approve the request in writing. Sponsor approval may be provided by the sponsor's grant or contract officer in the form of a letter, email/electronic notification, or formal award modification.

**NIH Prior Approvals: SPA Grants will submit the request through eRA Commons. [NIH NOT-OD-26-026](#)**



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