Council on Governmental Relations (COGR) Update: NIH Notice on Recovery Act Funding (April 7, 2009)

On April 3, NIH issued Notice number NOT-OD-09-080, entitled “NIH Award Terms and Additional Information for Recipients Receiving Recovery Act Grant Funding:”

Institutions should carefully review the new terms described in this April 3 announcement; a summary is provided below. The terms, particularly the reporting requirements, have been anticipated and generally conform to the requirements outlined in the Recovery Act and included in the recently released Federal Acquisition Regulations (FAR) interim rule and data elements proposed by the Office of Management and Budget for financial assistance awards.

NIH Award Terms and Additional Information for Recipients Receiving Recovery Act Grant Funding

Using a special banner, NIH will mark each Recovery Act Notice of Award (NOA) and reference the special Department of Health and Human Services-approved special terms. The award numbers will include an additional last character – a “Z” – to further identify the awards.

NIH provides the reporting requirements in the linked DHHS-approved terms. Report are required for each ARRA award and sub-award (sub-grant and sub-contract) separately. The quarterly reporting – not later than 10 days after the end of each calendar quarter – includes new data elements. In addition to predictable data – amount of the award; expenditures and obligations – the expenditures must be linked to project activities and an evaluation of the completion status. The report will require an estimate of the jobs created and/or retained and detailed information on subrecipients. The information on subrecipients includes the data required for compliance with the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282).

The Notice includes information on the payments as well. Recipients will draw down ARRA funds on an award-specific basis. Pooling of ARRA award funds with other funds for drawdown or other purposes is not permitted. The DHHS Payment Management System is establishing separate “P” accounts for grantees receiving ARRA funds and each individual NIH award will be established as a sub-account under the “master” P account for the institution.

This Notice describes special terms and business processes established for managing ARRA Administrative Supplements and Competitive Revisions – ARRA T-3 awards. Institutions applying for and receiving such awards will want to review this Notice carefully, as it describes unique business processes for rebudgeting, carryover of funds, no-cost extensions, and separate financial and closeout reporting.