



**Dana-Farber**  
Cancer Institute



# **POPC Faculty Meeting- July 16, 2024**

## **INTERNAL DEADLINE POLICY**

Raquel Espinosa, Vice President, Research Operations

# Agenda

1. Why changes to our internal deadlines is needed
2. Challenges from departments and G&C

The background is a solid light blue. In the bottom-left corner, there is a dark blue triangular shape. To its left, there is a vertical orange bar. The text is centered horizontally in the upper half of the image.

**Why changes are needed**

# Implications when submitting a grant

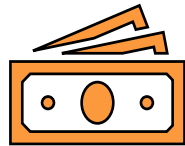
During the Pandemic months, several Non-Federal Sponsors began to share the award agreement terms and conditions in the **grant application instructions** and defined the institutional signature provided in the application submission as acceptance of these requirements.



Intellectual  
Property



Data  
sharing



Revenue  
sharing



Reporting



Disclosures on  
Allegations of  
Misconduct

Institutions that were willing to receive change requests required those changes to be provide at the time of application.

# Some of the challenges we are facing

- Increased Complexity in Agreement Terms and Compliance
- Requirements in Award Management
- Limited time to review grant and fellowship applications
  - Currently applications are received 9:00 a.m. day before they are due to the Sponsor
- Quality of applications routed for submission
  - First time GMOs become aware of Dept RA's issues or questions on application instructions, such as incomplete applications, applications with significant errors, or applications that do not align with instructions or sponsor's policies
- Recruitment and Retention during and post pandemic
  - Staff accepted remote positions at other organizations citing pay, reduced workload or more realistic internal grant deadlines
  - FY22 and 23 G&C onboarded 11 FTEs
  - Departments have also had high turnover, resulting in new people on G&C team supporting new people in the department

# New Internal Deadlines

# Internal G&C Deadlines

## **Grant Applications:**

- Soft launch: June
- Implementation date: September 1st

## **Progress Reports:**

- 5 business days

## **Just in Time- JIT:**

- 5 days if possible – we know that many times JIT is asked for in a shorter window these days

# Changes to reduce risks of institutional reputation

1

**Build-in Time to review applications**

**Departments** establish and enforce their **own timelines** and deadlines to meet this new policy. Guidance provided by **Dept's Business Office** for specific deadlines that apply to grant and fellowship proposals, progress reports, and JIT submissions.

2

**Built-in Comments**

Grants & Contracts review of application to be provided in **InfoEd** and **feedback will live in the record** for future reference.

3

**Feedback applications**

Comments and feedback will **inform** the **quality** of the **applications** to focus on training and resources.

4

**Improved quality of records**

Pre-award team update record status in the system to provide accurate reporting of proposals.  
• **QC management** of data

# Proposal Application

## Department Preparation

### Research Administrator:

- Requests G&C Agreements review of terms and conditions for applications that institutional signature certifies agreement terms acceptance
- Works with PI on all administrative components according to funding opportunity
- Coordinates w/staff and collaborators collecting biosketches, SOI/SOW, budgets and resources
- Work with G&C to clarify sponsor requirements as needed
- Secures Chief & DA approvals (all applications) and other institutional approvals (as needed)

## Administrative Sections

### GMO Reviews:

- Funding opportunity
- Administrative components including signed SOI/SOW
- Verifies budget congruency with budget justification
- Ensures compliance with institutional and funding requirements such as PI Eligibility, Cost Sharing, budget cap or restrictions of budget line items,
- Works with OGC, BODFI and/or Agreements team to review specific terms and conditions requiring approval during proposal
- Data Management Sharing Plan

## Science Sections

### GMO Reviews:

- URLs and hyperlinks
- PMCIDs
- Headings w/each section within page limit
- Bibliography format
- Blinded applications (example DOD, Mass Life Sciences)

- Dept and central resolve system issues involving eCommons, ASSIST, InfoEd
- Recalling and resubmitting applications at PIs request

# Late Applications

**Investigators will not be allowed to request an exception for a late submission more than two times**

In accordance with the NIH [NOT-OD-15-039](#), late submissions will be considered under the following circumstances.

- Death of an immediate family member of the PD/PI (or MPI).
- Sudden acute severe illness of the PD/PI (MPI) or immediate family member.
- Temporary or ad hoc service by a PD/PI on an NIH advisory group during the two months preceding or the two months following the application due date. Examples of qualifying service include: participation in an NIH study section/special emphasis panel, NIH Board of Scientific Counselors, Program Advisory Committee, or an NIH Advisory Board/Council. Qualifying service does not include participation in NIH activities other than those involved in extramural/intramural peer review or NIH Advisory Council/Board service.
- Delays due to weather, natural disasters, or other emergency situations, not to exceed the time the applicant organization is closed.
- For PD/PIs who are eligible for continuous submission ([link to Continuous Submission](#)), the late application policy applies to activities not covered under the continuous submission policy (i.e., other than R01, R21, and R34 funding opportunities that use standard due dates).

*\* Note for PI under continuous submission: the new deadline should be used and the internal deadline still applies to the new date.*

# Late Applications

- Late Applications that do not meet the internal deadline policy would require prior approval from the **CSO** -Chief Scientific Officer
- **G&C cannot guarantee** that a proposal received after the internal deadline will receive a **thorough review**. Late proposals may jeopardize successful submission of the proposal to the sponsor and may impact the funding of the application.
- If a late proposal is funded and is found to contain financial or administrative inaccuracies, **DFCI reserves the right to renegotiate** and/or re-budget the award and return funding to the sponsor if necessary.
  - For example, if F&A costs are not budgeted for the first \$25K of each sub-contract, the award will be re-budgeted using direct costs to compensate for the F&A – an F&A waiver would not be granted.

# Proposal Application Assurances

## 1. Principal Investigator Assurance (through the cover sheet):

- By signing below, I certify that the information submitted within this proposal is true, complete and accurate to the best of my knowledge. I am aware that any false, fictitious, or fraudulent statements or claims may subject me personally and/or DFCI to criminal, civil or administrative penalties. I agree to accept responsibility for the scientific and financial conduct of the project(s) and to submit all required reports if a grant/contract is awarded as a result of this proposal.

## 2. Department Chair Assurance (through the cover sheet):

- By signing below, I acknowledge scientific oversight and commitment of space & facilities needed for this proposal.

## 3. Department Administration Assurance (through the system approval):

- By signing below, I acknowledge I have reviewed all administrative and financial aspects of this proposal and accept responsibility for the administrative and financial oversight if this proposal is funded.

# Feedback

- Are there any issues to consider with the new internal deadlines?

**The internal deadline policy is critical for ensuring the integrity of grant proposals, foster collaboration, identify and address challenges, optimize proposal quality, align with institution policies, and ensure legal compliance.**

**It allows for a comprehensive review process that ultimately enhances the chances of securing research funding and retaining our talented staff.**

# Appendix Slides

# Appendix

1. FY2023 Activity
2. Where G&C wants to be
3. G&C Restructuring
4. Other Efforts

# FY2023 Activity



1273  
applications  
requesting  
\$1.2+ Billion



337  
awards  
funding  
\$323+ Million



365  
Principal  
Investigators



669  
Fellows



## Fellowships

244 Applications

- 72 Awards

## Awards/Contracts

*DFCI is Pass-through Entity/Prime*

614 Applications

- 222 Grant Awards
- 2 Contracts

## Subawards (outgoing off Awards)

- 543 executed  
agreements and amendments

## DFCI Subaward/Subcontracts

*DFCI is Subrecipient (Inbound)*

407 Applications

- 106 Subawards
- 2 Subcontracts

## Billing Agreements (in/outgoing)

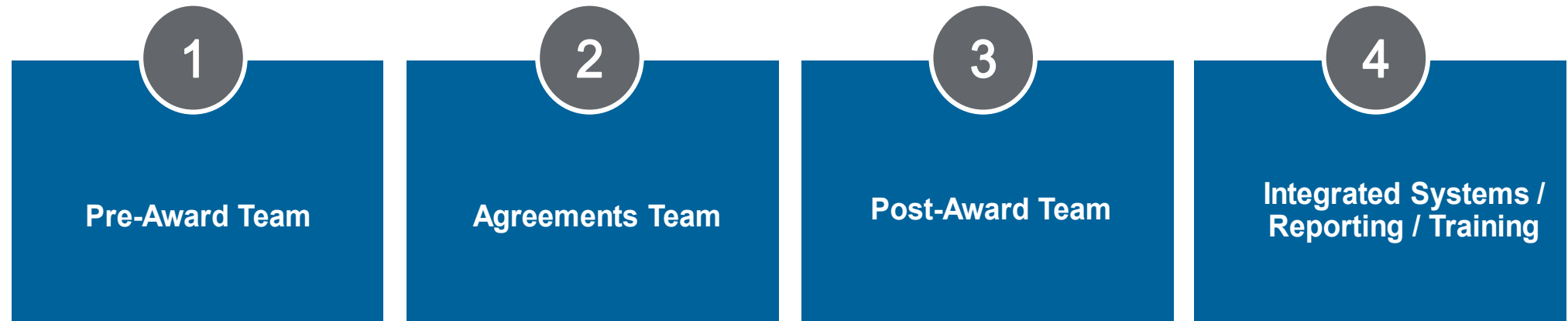
- 359 Billing Agreements

## **Vision:** Where Grants & Contracts (G&C) wants to be

- Defined **subject matter expert teams** for greater support and **scalability**
- **Functional teams** that provide focused expertise for research enterprise
- Ongoing, cross-training, **staff flexibility** to help meet the evolving needs of the research enterprise
- **Leverage systems** to define clear workflows and create efficiencies
- **Leveraging a road map for agreement terms and conditions** with areas identified by Senior Leadership and OGC for being “nimble” from a risk perspective

# Restructuring to **Improve G&C Services**

Internal Deadline and a Team Restructure are identified to improve the wide range of services preformed by G&C:



With the new proposal deadline, establishing a Pre-Award Team of subject matter experts to better support the institutional review of final applications and provide training and guidance.

With the Agreements Module, the Agreements Team will be able to provide workflows and transparency to the negotiation process to bring about the best agreement for both the investigator and the institution as well as identify efficiencies for the process.

Establishing a Post-Award Team will allow us to improve our efficiencies with award management, to leverage systems and ensure data integrity, and support overall compliance with our accepted awards.

- QC management of data
- System optimization
- Training guides and one-pagers
- Web site content
- Continuous learning and cross-training
- Forms

# Grants & Contracts Responsibilities by Team

## Pre-Award Services



Responsible for ensuring that all grant and fellowship applications conform to the sponsor guidelines, includes all required forms, and institutional information is correct. Responsible for the review and submission of Just-in Time (JIT) requests and annual, interim and final technical reports (RPPR) and final invention statements (FIS). Subject Matter Experts on all forms related to the Pre-Award process.

## Agreement Services



Responsible for reviewing, drafting, negotiating, and accepting the grant agreement to ensure institutional acceptance of the award obligations. Responsible for ensuring the institution and PI's interests are protected and to advise when terms cannot be negotiated in accordance with established institutional policies. Areas of focus include: Intellectual Property, Publication Rights, Data Rights, Patient Privacy. Assists with ancillary agreements related to grants or serving on peer review panels, such as Confidential Disclosure Agreements (CDA) and Non-Disclosure Agreements (NDA).

## Post-Award Services



Responsible for account set-up; drafting and negotiating federal subaward; obtaining sponsor approvals for administrative actions such as pre-award expenditures, re-budgeting, no-cost extensions, etc. Subject Matter Experts on compliance with award agreement terms. Manage communications with Sponsors when change necessitates prior approval.

# Other Efforts

- New Internal Deadline Policy
  - Application Feedback
  - Budget Template
  - Reporting of internal deadline compliance
- Complex Agreement Processes – Master Agreements Grid
- Grant Funded Clinical Trials Best Practices
- InfoEd Enhancements
  - Agreements Module
  - System Improvement: leveraging InfoEd features and review of processes
- Project NExT
- Assessment and prioritization of Backlog based on Aging Reports
- New Workgroups
  - Other Support
  - Breakthrough Cancer