RCRA - Research Security

David Sundvall, Assistant Director Research Security

Ask RCRA January 2024

NIH Foreign Subawards

Effective January 2, 2024, NIH Grants Policy Statement, section 15.2, is being updated to require that foreign subrecipients receiving subawards under a grant provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the RPPR (Research Performance Progress Report), to the primary recipient no less than once a year. Access may be entirely electronic.

NIH Foreign Subawards

The agreement to the new requirement must be in writing and must be signed by both parties; NIH will not support grant awards lacking agreement to the new requirement

NIH reserves the right to request copies of the written agreement and relevant supporting documentation as needed, as part of its oversight responsibilities.

NIH Foreign Subawards

NIH expects recipients to update existing foreign subaward agreements within 60 days of the effective date (by March 2, 2024).

NIH recognizes that recipients may need additional time depending on the number of agreements an institution has in place for each project. Therefore, extensions may be requested, if needed, by contacting the Office of Policy for Extramural Research Administration.

NIH Foreign Subawards

NIH expects prime recipients to ask potential subrecipients, at the application stage, to submit language in their letters of support indicating their awareness of these requirements and the subrecipient's willingness to abide by all requirements should an award be issued.

NIH Foreign Subawards

Emory's Office of Sponsored Programs, Grants and Contract team will coordinate agreement updates.

NIH Foreign Subawards

Prime recipients should continue to review all subaward documentation to confirm that the performance outcomes that are reported in the Research Performance Progress Report (RPPR) are accurate, complete, and properly reflect programmatic goals, as stated in the RPPR.

No change to records retention: 3 years from the date the final FFR is submitted to NIH.

NIH Foreign Subawards

Research Compliance and Regulatory Affairs (RCRA) is working with the Office of Information Technology (OIT) to set up a repository solution that meets the new requirement. Emory's SharePoint Sites may be a suitable solution in some cases. Technical support for the decision-making process can be obtained from local IT support and Emory's Office of Information Technology.

NIH Foreign Subawards

Survey sent out in December to 64 PIs with NIH foreign subawards (2 were contracts – not grants)

34 Responses (53% response rate)

NIH Foreign Subawards

Would you be likely to make use of this new Emory SharePoint repository to meet the new NIH requirement?

- Yes   19
- No   9
- Other   6 (possibly or unknown)

Do you already have access to the required supporting documentation to meet the new NIH requirement?

- Yes   15
- No   11
- Other   8 (not started, no data yet, need to gather data)

If YES, is the data kept at the foreign subawardee's site or at Emory?

- 14 at subawardee's site
- 15 at both Emory and foreign sub, one is using Emory's Redcap

Questions

For more information:

RCRA

Research Security | NIH Foreign Subawards

Email: researchsecurity@emory.edu

NIH Foreign Subawards