



G&CAAlert!

Yale University
Grant and Contract Administration
Grant and Contract Financial Administration
Volume 3, Issue 2
Week of June 21 - June 25, 2010

Alert(s):

- Clarification Regarding Changes to NIH PHS 2590 Progress Reports

“The PI must now report the effort of ALL personnel (no longer just key personnel) who devote one or more person months to an NIH research project in addition to unique reporting requirements for key personnel.”

Grant & Contract Administration

47 College Street, Ste 203
Phone: (203) 785-4689
FAX: (203) 785-4159
FAX: (203) 785-4169
FAX: (203) 785-5938

Grant & Contract Financial Administration

47 College Street, Ste 216
Phone: (203) 785-3630
FAX: (203) 737-5837

www.yale.edu/grants

Clarification Regarding Changes to NIH PHS 2590 Progress Reports

Numerous questions have been received regarding the “All Personnel Report” section of the revised PHS 2590 report introduced by NIH in the fall of 2009. (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-09-139.html>)

The PI must now report the effort of ALL personnel (no longer just Key Personnel) who devote one or more person months to an NIH research project in addition to unique reporting requirements for key personnel. Postdoctoral associates or scholars who participate on an NIH project for at least one month must be included in the All Personnel Report and must now have eRA Commons IDs.

Key Personnel vs. All Personnel

Although the effort of all personnel must now be included on the progress report, Key Personnel may still be named by the PI when submitting a proposal and are still addressed in SNAP/eSNAP Question #1 on the PHS 2590 progress report even though they are no longer identified as a distinct subgroup on the All Personnel Report. **Note that only those individuals named on the notice of award (NOA) are subject to prior approval requests for effort reduction.** If the PI is the only person named on the NOA then only his/her request to reduce effort by 25% or more from what was in the awarded budget should be sent to NIH for review and approval. (Effort for these individuals should not be reduced by 25% or more until prior approval has been granted by NIH).

Although prior approval is required to reduce effort 25% or more for key personnel named on the NOA, changes to Other Support in the progress report should be included for all Key Personnel following the instructions in Section 2.1.2 of the PHS 2590.

<http://grants1.nih.gov/grants/funding/2590/phs2590.pdf>. Other Support for Other Significant Contributors should not be included unless their role has changed to Key Personnel.

Postdocs

NIH already requires that postdoctoral fellows and graduate students who submit NRSA fellowships have eRA Commons user accounts with a role of **PI**. They are now asking that all postdocs who work on research grants have an eRA Commons user account with a role of **POSTDOC**. If the Postdoc already has a user account with a role of **PI**, GCA can add the **POSTDOC** role on request. Similarly if a Postdoc on a research grant with a role of **POSTDOC** wishes to submit an application for a NRSA fellowship, GCA can add the role of **PI** to their account on request. It is not necessary that all postdocs have both roles but it is necessary that postdocs have the **CORRECT** role, depending on whether they are on a research grant, fellowship or are going from one to the other.

Because this is now a requirement, incoming postdocs may already have an eRA Commons user account from their previous institution. With some basic information from the Postdoc or department (user id, correct name and the email address used in their eRA Commons profile), upon request, GCA can affiliate those IDs to Yale University with an appropriate role of **POSTDOC** or **PI** as discussed above. This should be done before the Postdoc submits a fellowship application or is listed on an NIH Progress Report.

For additional information regarding the definition of Key Personnel and reporting requirements, refer to the ORA Newsletter from January/February 08.

<http://yale.edu/researchadministration/resources/docs/ORANewsletterjanfeb08.pdf>

Please note that in the article, the reference to the Key Personnel Report under SNAP Question #2 on page 4 is outdated. The All Personnel Report now replaces the Key Personnel Report.