Office of Sponsored Programs

EQUIPMENT REQUEST CHECKLIST

Equipment requests should be submitted in PEER:

- \Box Click on "Grants" \rightarrow "Equipment Rebudget Request"
- □ Create from Primary Grant Rebudget request
- □ Add additional grant information
 - □ If multiple grants are involved in the request, each PI must electronically sign the PEER approval for the grant and % effort charged to the grant
- □ Attach a copy of the quote and any supporting documentation
- □ Add SOW justification to box (attachment as needed)
- Determine whether NIH prior approval is required
 - □ Significant rebudgeting
 - Review all rebudgets for the overall project period to ensure rebudget will not exceed 25% limit
 - Identify any red-flags that may constitute a change in scope (changes to the direction, aims, objectives, purpose, types of research training, or purchase of equipment in excess of \$25,000)
 - If the PI does not believe said request changes the scope of the project, he or she should secure the concurrence of the NIH Program Official. If the NIH Program Official concurs, the request does not warrant prior approval from NIH
 - Concurrence documentation should be uploaded with the equipment request
- Once submitted, confirm all PIs approve electronically so request will be assigned to Specialist for review

*See additional clarifications below regarding the following:

- Helpful information for PEER submission
- Allocation Requests for Multiple Grants
- NIH Prior Approvals
- Scope of Work

Helpful Information for Department Administrator to obtain from PI and others:

- 1. Information needed from the PI
 - a. Date of anticipated purchase
 - b. Grant # and year to be utilized
 - c. Price quote of equipment
 - d. Scientific Justification of Need
 - e. Departmental Approval for Purchase
- 2. If multiple cost centers will be utilized
 - a. Grant # and year or cost center # (internal dept)
 - b. Allocation justification across cost centers (% use by award)
 - c. Scientific justification of need for all additional restricted cost centers specific to the project
 - d. Approval of all PI's (will be coordinated in PEER)
- 3. If constituted a scope of work change, if it is over 25% of direct costs, or \$25,000 total
 - a. Email approval from Program Officer confirming no change in scope, or Letter request to PO requesting approval
 - b. Each grant requires individual approval

Allocation Requests for Multiple Grants

If an equipment purchase only benefits one grant, it should be charged entirely to that award. Sometimes newly purchased equipment can benefit more than one grant or project. When this happens, the equipment must be charged in the same proportion as it benefits each of the grants or activities.

Example of an Equipment Purchase Request Allocated Correctly

We would like to request approval for the purchase of a -80oC freezer to store biological samples. The cost of the freezer is \$15,324.61 and will be charged to three grants. The allocation was determined based on how much freezer space would be needed for each of these projects.

PI Name	Grant Number	Percentage	Amount
Matthew Snow	5R01 HL123456-02	30%	4,597.38
John Rain	1R01 Al345128-01	40%	6,129.85
Susan Sunshine	5P01 HL883456-07	30%	4,597.38
	Total	100%	15,324.61

Equipment costs may not be allocated based on:

- Amount of available funds on an Award.
- Budgetary convenience (to accommodate an Award that is either over or under budget, budget is ending soon).
- Avoidance of restrictions imposed by law or terms of the Award.

Example of an Equipment Request Allocated Incorrectly

• We would like to request approval for the purchase of a centrifuge with a cost of \$8,225.36. The cost will be split between four grants.

PI Name	Grant Number Percentage		Amount
Jack Frost	7R01 CA076543-03 25%		\$2,056.34
Jack Frost	1R01 HL246357- 01A1	25%	\$2,056.34
Mary Clouds	2R01 DK108473-32	25%	\$2,056.34
Linda Sleet	5R01 AI435640-28	25%	\$2,056.34
	Total	100%	\$8,225.36

NIH Grants Policy Statement: Prior Approvals

https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.1.2_prior_approval_requirements.h tm

<u>Change in Scope</u>: Potential indicators of a change in scope include, but are not limited to, the following:

- Change in the specific aims approved at the time of award.
- Substitution of one animal model for another.
- Change from the approved use of live vertebrate animals.
- Change from the approved involvement of human subjects that would result in an increased risk. This includes:
 - An addition or change that would result in changing the overall human subjects or clinical trial designation of the award;
 - From non-human subjects research to human subjects research (exempt or non-exempt);
 - From exempt to non-exempt human subjects research; or
 - From "No Clinical Trial" to "Includes a Clinical Trial." Requests for this change must be submitted to a clinical trial FOA as a competitive revision. See NIH definition of <u>clinical trial</u> and <u>2.3.5 - Types of Funding</u> <u>Opportunity Announcements</u>.
 - The new inclusion of subject populations that are covered by additional regulatory protections under 45 CFR 46 subparts B, C or D (pregnant women, human fetuses, and neonates; prisoners; or children).
 - Any change to the study protocol that would increase the risk level for subjects including physical, psychological, financial, legal or other risks. This could include the addition of a new study population that would be at higher risk from existing research procedures, the addition of new study procedures that are greater than minimal risk, any modification of existing study procedures that would increase overall risk, or the addition of a new clinical study or a new clinical trial intervention arm not originally proposed that is greater than minimal risk.
 - New information indicating a higher level of risk to participants than previously recognized for a study intervention, procedure, or pharmacological treatment.
- Shift of the research emphasis from one disease area to another.
- A clinical hold by FDA under a study involving an IND or an IDE.
- Application of a new technology, e.g., changing assays from those approved to a different type of assay.
- Transfer of the performance of substantive programmatic work to a third party through a <u>consortium agreement</u>, by contract, or any other means. If the third party is a foreign component, NIH <u>prior approval</u> is always required.
- Change in other senior/key personnel not specifically named in the <u>NoA</u> (see <u>Change in</u> <u>Status</u>, <u>Including Absence</u>, of PD/PI and Other <u>Senior/Key Personnel Named in the</u>

<u>NoA</u> below for requirements for NIH approval of alternate arrangements for or replacement of named senior/key personnel).

- Significant rebudgeting, whether or not the particular expenditure(s) require prior approval. Significant rebudgeting occurs when expenditures in a single direct cost budget category deviate (increase or decrease) from the categorical commitment level established for the budget period by 25 percent or more of the total costs awarded. For example, if the award budget for total costs is \$200,000, any rebudgeting that would result in an increase or decrease of more than \$50,000 in a budget category is considered significant rebudgeting. The base used for determining significant rebudgeting excludes the effects of prior-year carryover balances but includes competing and non-competing supplements. Significant rebudgeting does not apply to modular grants.
- Incurrence of research patient care costs if costs in that category were not previously approved by NIH or if a recipient desires to rebudget additional funds beyond those approved into or rebudget funds out of the research patient care category.
- Purchase of a unit of equipment exceeding \$25,000.

Scope of Work (SOW)

The SOW describes the work to be conducted in the grant. It defines the deliverables, and if applicable, outlines the time frame in which they are to be delivered. The SOW may also define all personnel and their responsibilities.

Per NIH Grants Policy Statement (and several other federal agencies), the PI may make changes in the methodology, approach, or other aspects of the project objectives., however, the recipient must obtain prior approval, if there is a change in the scope. A change in scope is a change in the direction, aims, objectives, purposes, or type of research training, identified in the approved project. The recipient must make the initial determination of the significance of a change and should consult with the GMO as necessary.

Sufficient Examples of SOW support

Example of a SOW supporting a single grant:

This rebudget will support the purchase of a gobstopper simulator. This simulator is needed to sort and categorize the data collected in the first 3 years of this grant. Conversion of this raw data into workable units will allow us to complete Aims 2 and 3, and also facilitate dissemination of this information to the scientific community. This simulator will replace a 10-year old, less efficient model and will facilitate on-time completion of this project.

Multiple grant rebudget:

This rebudget for equipment purchase will impact the following Grants/centers. These grants do not share a common Aim, and have different levels of use/need as outlined below:

PI/Grant	%	Aims addressed	Purpose/SOW
	Use		
Dr. Bobb – 5R01CA4221-04	10	Aim 3 – clean data mining	Equipment will facilitate translation of
			data into collectible units
Dr. Wendy – 7U01CA24988-02	25	Aims 2, 3 and 4 – data conversion	Conversion of raw data for aims

Insufficient Examples of SOW support:

Single grant rebudget

This rebudget is needed to purchase a gobstopper simulator to complete Aim 2.

Multiple grant rebudget:

The rebudget will be shared 50-50 by two PI's in XX department who need the gobstopper simulator from time to time.