Icahn School of Medicine at Mount Sinai

Grants and Contracts Office
One Gustave L. Levy Place Box 1075
New York, NY 10029-6574
Phone: 212.824-8300
Facsimile: 212.241-3294
Email: grants@mssm.edu

Documentation and Instructions for Sponsored Projects with Subawards When ISMMS is the Prime Institution

Introduction

The purpose of this memo is to inform you of the required documentation you will need from the sub-recipient and the pertinent extramural and internal policies and procedures when the Icahn School of Medicine at Mount Sinai (ISMMS) is the prime institution submitting a sponsored project application. It also includes information specific to NIH competitive applications, NIH requirements for senior/key personnel submitting Other Support pages, and requirements for covered individuals on applications under the CHIPS and Science Act. The terms "sub-award" and "sub-recipient" are used interchangeably. The memorandum is organized in the following sections:

I. List of Required Documentation - p. 2
II. Checklist: Subaward Documentation on a NIH Competitive Application - p. 3
III. Instructions - p. 3
A. All Application Types (i.e., Competitive, Non-Competitive, No Cost Extensions)
1. Statement of Intent to Establish a Consortium Agreement (SOI) - p. 4
2. Statement of Work (SOW) or Confirmation of No Change - p. 4
3. Other Documentation Required by Funding Agency - p. 6
4. Certification of Compliance with HHS COI Policy - p. 6
B. Competitive and Non-Competitive Applications
1. Budget - p. 7
2. Budget Justification - p. 8
3. Other Requirements - p. 9
C. NIH Competitive Applications (i.e., New, Resubmission, Competitive Renewal)
1. Performance Site Information - p. 9
2. Resources and Facilities - p. 9
3. Biosketches - p. 9
4. eRA Commons ID - p. 10
5. Letters of Support - p. 10
6. Inclusion Enrollment Report Data - p. 10
7. Multiple PD/PI Leadership Plan - p. 10
8. Consortium/Contractual Arrangements - p. 10
9. F&A Rate Agreement - p. 10
10. Foreign Subawards - p. 10
D. Other Requirements and Guidance
1. Training Certification of Senior/Key Personnel on NIH Grants Submitting Other Support - p. 13
2. Federal Research Security Training for Agencies Under the CHIPS & Science Act - p.14
3. Data Entry on InfoEd Budget and Personnel Tabs - p. 14
4. Subawards on Subawards - p. 15

IV. Resources - p. 15
V. Significant Changes to this Document from Prior Versions - p. 16

Sections highlighted in blue are instructions on placement of information and documentation in InfoEd.

Any document that is for GCO use only and not submitted to the extramural funding agency, upload in InfoEd in the "Internal Documents" tab. All other documents, place in the appropriate InfoEd section.

Please contact your assigned GCO Grants Specialist for any questions you may have. For a listing, please click here:

I. List of Required Documentation

A. All Application Types (i.e., Competitive, Non-Competitive, No Cost Extensions)

The following documents are required for all sponsored project submissions with a subaward or subawards except when submitting final report applications:

1. Signed Statement of Intent (SOI) to Establish a Consortium Agreement
2. Statement of Work (SOW) or Confirmation of No Change
   - Competitive Applications: Include a SOW.
   - Non-Competitive and No Cost Extension Applications: Include a SOW or confirmation statement from the ISMMS PI that there is no change.
3. Other Documentation Required by Funding Agency

Please review these sections: Data Entry on InfoEd Budget and Personnel Tabs and Subawards on Subawards.

4. Certification of Compliance with PHS Federal Conflict of Interest (COI) rules and regulations effective 8/24/2012
   The COI certification is required only for U.S. Department of Health and Human Services (DHHS) sponsored research (e.g., National Institutes of Health, Centers for Disease Control and Prevention, Agency for Healthcare Research and Quality:

B. Competitive (i.e., New, Resubmission, and Competitive Renewal) and Non-Competitive Applications

In addition to all of the documentation above, the a following document is required from the sub-recipient for competitive and non-competitive sponsored applications in which funding is requested:

1. Budget

In addition to all of the documentation above, the following document is required from the sub-recipient for competitive applications:

2. Budget Justification

3. Other Requirements
   In addition to the documentation above, NIH non-competitive applications will need to include Other Support disclosure certification for any senior/key personnel submitting Other Support page or provide documentation from the subrecipient AOR that they have completed the training. See the Training Certification for Senior/Key Personnel on NIH Grants Submitting Other Support section for additional information.

C. NIH Competitive Applications (e.g., New R01, Competitive Renewal P30)

In addition to all of the documentation above, the following documents are required from the sub-recipient for all NIH competitive applications:

1. Performance Site Information
   Institution Name, Address, Country, UEI, Congress District
2. Resources and Facilities page
3. Biosketches for Key Personnel including Other Significant Contributors and Consultants
4. eRA Commons Requirement

5. Letters of Support
6. Inclusion Enrollment Report Data, if applicable
7. Multiple PD/PI Leadership Plan, if applicable
8. Consortium/Contractual Arrangements, if applicable
9. F&A Rate Agreement, if applicable
10. Foreign Subaward Data Access Provision in SOI, if applicable

II. Checklist: Subaward Documentation on a NIH Competitive Application

The checklist is a tool designed to help the PI and his/her research team gather the required information and documents for competitive applications as well as to provide the subawardee team basic administrative information they will need such as the project period dates, the subaward budget amount, funding opportunity #, and your deadline for submission of materials. The checklist includes additional instructions on the Statement of Intent (SOI) to Establish a Consortium Agreement, Statement of Work (SOW), and Federal COI policy. It is a duplication of instructions covered in this memo for the subawardee team.

The checklist entitled "NIH Competitive Subaward Checklist: ISMMS as the Prime Institution" can be downloaded here.

To use, complete the appropriate sections of the checklist and forward it to your contact at the sub-recipient.

We recommend that you receive all the required documentation (#1-13 in Section I above) in FINAL form from the subawardee at least 10 business days before the NIH deadline. Your application is due to the GCO in COMPLETE and FINAL form, including completed and signed Conflict of Interest and Suspension and Debarment forms as appropriate, at 11am 5 business days before the NIH deadline. That gives you 5 business days to review, enter, upload the information as well as process your InfoEd application through your department and any other departments where there are key personnel.

The checklist is not a required document. You do not need to upload it in your InfoEd application.

III. Additional Instructions

A. All Application Types (i.e., Competitive, Non-Competitive, No Cost Extensions)

1. Signed Statement of Intent (SOI) to Establish a Consortium Agreement

a. Other commonly used terms

This document is also commonly referred to as "Subcontracting Letter of Agreement," "Consortium Letter of Intent," and "Letter of Commitment or Intent Signed by the Consortium Participant" among other variations.

b. Purpose of Letter

The SOI is the official letter signed by the sub-recipient's Authorizing Organization Official (AOR) attesting that his/her institution is aware of all applicable Federal regulations and policies and will establish a subaward agreement. **ISMMS cannot submit the sponsored project application to the extramural funding agency without the SOI. Failure to obtain a signed SOI will result in the subawardee being removed from the application.**

Also, please note that the actual signing of the subaward agreement by ISMMS and the sub-recipient will occur at a later date if the project is funded. This letter does not take the place of the agreement. The SOI is a prerequisite for the submission of the application.

c. Template Form
Click here for a template. Many institutions use their own Subaward Statement of Intent form. The Federal Demonstration Partnership (FDP) Subrecipient Letter of Intent or Commitment Form is another acceptable option. There is no requirement to use the ISMMS template as long as the other version provides the appropriate information and endorsement.

d. PHS 398 and 2590 Face Page Options
GCO accepts the PHS 398 and 2590 face pages in place of the statement of intent since it includes the required language and signature.

e. Institutional Addressee and Signatory
SOI letters and templates from other institutions may require the name of your authorizing organization official (AOR). If so, please have them address the SOI to your designated ISMMS AOR. A listing of ISMMS AORs by department is available here.

The subawardee AOR must sign the SOI.

Please include the signed SOI in your InfoEd application > Internal Documents tab. Choose the "Subaward Statement of Intent to Establish a Consortium Agreement" category.

2. Statement of Work (SOW) or Confirmation of No Change

For competitive applications, include a SOW. For non-competitive and no cost extension applications, include a SOW or confirmation from the ISMMS PI that there is no change. The confirmation document can be a memo from the PI stating, "I confirm there is no change to the Statement of Work."

A Statement of Work is a description of the work the sub-recipient will perform. The SOW will be part of the legally binding subaward agreement if the project is funded. Also, if funded, please note that the SOW should be 4,000 characters or less and include information that may be made publicly available to comply with Federal Funding Accountability and Transparency Act (FFATA) requirements since it will be used to populate the "Sub-Award Description" section of usaspending.gov. There is no template since it is project specific. The document at a minimum should include the objective or purpose of the sub-recipient's participation and a general description of the actions to be performed by the site and the expected results.

Please include the SOW or confirmation in your InfoEd application > Internal Documents tab. Choose the "Subaward Statement of Work" category.

3. Other Documentation Required by Funding Agency

Refer to the extramural funding agency application instructions for any documents or information that the agency requires from the sub-awardee. You will need to submit those documents to the GCO as well.

4. Certification of Compliance with HHS Financial Conflict of Interest (COI) Rules and Regulations Effective 8/24/2012

The National Institutes of Health (NIH) and all of the Department of Health and Human Services (DHHS) agencies, such as the Centers for Disease Control (CDC) and the Agency for Healthcare Research and Quality (AHRQ), must comply with the HHS COI policy.

a. NIH Policy

The NIH issued a revised conflict of interest policy and mandated compliance from all institutions who receive funds from the NIH either directly or as a subaward. The revised regulations were designed to promote greater objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research performed under NIH grants or cooperative agreements will be free from bias resulting from an investigator's financial conflicts of interest. Policy information is located on the NIH COI website.

b. **Compliant Institutions: Check to Ensure Sub-recipient's COI Compliance in Advance of the NIH Deadline**

Most of the institutions and academic medical centers that ISMMS collaborates with are compliant with the PHS COI regulations but some smaller sites and international sites that don't receive funding from the NIH might not be.

Check as soon as possible the list of compliant institutions entitled "List of Compliant Institutions and Entities" located on the Federal Demonstration Partnership (FDP).

In the cases numbered "ii – iii" below, the sub-recipient will need to submit an additional certifying statement or add the appropriate certification statement in the Statement of Intent to Establish a Consortium Agreement (SOI). The institution can also use the ISMMS SOI template, which includes the COI language.

i. Compliant and on FDP List

If the institution is compliant and also listed on the FDP list, there is no further action necessary.

ii. Compliant and not on FDP List

If the institution is compliant and not listed on the FDP list, the Subawardee AOR must certify that his/her institution is compliant with the COI regulations. The sub-recipient must submit an additional certifying statement or add a certification clause to the SOI, as follows:

"My institution is compliant with HHS Financial Conflict of Interest (COI) Requirements 42 CFR Part 50, Subpart F, entitled "Responsibility of Applicants for Promoting Objectivity in Research" effective 8/24/12."

iii. Compliant under ISMMS Policy

Institutions that are not compliant may choose to rely on ISMMS Policy for compliance. They will need to take 2 actions as follows each year of the project:

#1: The sub-recipient must submit an additional certifying statement or add a certification clause to the SOI, as follows:

"My institution agrees to comply with HHS Financial Conflict of Interest (COI) Requirements 42 CFR Part 50, Subpart F, entitled "Responsibility of Applicants for Promoting Objectivity in Research" effective 8/24/12 under ISMMS COI policy. Each Investigator, defined as a person responsible for the design, conduct or reporting of research regardless of title or position, and/or Covered Individual (defined as an individual who— (A) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (B) is designated as a covered individual by the United Stated Federal research agency concerned, shall complete the education presentation and disclosure form. Any potential conflicts shall be managed through a plan formulated by ISMMS."

#2: Each Investigator (see definition in #1 above) and/or Covered Individual must complete the education presentation and disclosure form. Both of these items are included on one form. Click here for the "COI Form for Subawardees Under ISMMS Policy". The COI form must be completed no less than annually. Any Investigator or Covered Individual added to the research team during the grant funding period must immediately submit a COI form...

Please upload the signed COI form(s) (one form per investigator) in your InfoEd application > Internal Documents tab. Choose the "Subaward COI Information" category.

B. Competitive and Non-Competitive Applications

In addition, the following document is required from the sub-recipient for all competitive and non-competitive sponsored applications in which funding is requested:

1. Budget

GCO requires, at a minimum, as much budget information and documentation as the extramural funding agency requests.

a. Competitive Applications

See note above for requirements. For NIH non-modular grants (e.g., new R01 where direct costs per year are greater than $250,000), an initial budget from the subaward is required. If the budget differs each year, also please provide the entire proposed period of support budget. In the case of NIH modular grants, at a minimum, the subaward budget must include all key personnel, other direct costs, F&A, and total costs for the initial and entire proposed period of support.

b. Non-Competitive Applications

The GCO requires the budget for the upcoming budget period only. If this was originally a NIH modular grant, you will need a budget that at a minimum includes all key personnel, other direct costs, F&A, and total costs.

c. No Cost Extensions

Only in the case where the funding agency requires a budget, does the GCO also require the budget. Please consult the extramural funding agency instructions for additional information. Since the NIH does not require a budget for the first no cost extension period requested prior to the project period end date, GCO does not require the budget either. However, do consult with your department for other requirements. It is good business practice, for example to request a budget for an NIH no cost extension, if there are key personnel from the sub-recipient designated on the notice of award to confirm that effort will not be reduced by 25% or more.

a. – c. *above*:
For S2S submissions, please upload the budget(s) InfoEd > Internal Documents tab. Choose the "Subaward Budget" category.

For non-S2S submissions when the budget is part the funding agency application (e.g., new private foundation grant application that has a budget form, upload it in InfoEd > Research or Program Plan tab for new projects and the InfoEd > Progress Report tab for all others. You don't need to separate it from the rest of the documents that you upload in these tabs.

For non-S2S submissions when the budget is not part the funding agency application forms (e.g., NIH R21 non-competitive continuation, upload it in InfoEd > Internal Documents tab.

2. Budget Justification

In addition to all of the documentation above, a budget justification is required from the sub-recipient for competitive applications.

For NIH modular grants, provide a budget narrative for all personnel (e.g., subaward PI, TBN post doc) including consultants and other significant contributors. For NIH non-modular grants, provide a detailed budget justification. Please refer to the agency instructions for all other applications.

For S2S submissions (e.g. NIH new R01), upload in InfoEd Budget>Budget Items> Subcontractors> Detailed Budgeting > Justifications.

For non-S2S submissions, if the budget is part of the documents requested by the funding agency, upload into the "Research or Program Plan" tab for new projects and the "Progress Report" tab for all others. You don't need to separate the justification from the rest of the documents that you upload in these tabs.

3. Other Requirements

In addition to all of the documentation above, non-competitive applications will need to provide NIH Other Support disclosure certification for any senior/key personnel submitting Other Support page or provide documentation from the subrecipient AOR that they have completed the training. See the Training Certification for Senior/Key Personnel on NIH Grants Submitting Other Support section for additional information.

C. NIH Competitive Applications: Additional Documentation

Additional instructions are provided below for NIH competitive applications.

1. Performance Site Information

As per the NIH instructions, the Institution's name, address including the 9 digit zip code, country, and congressional district number are required. This information may be pre-populated in InfoEd so you may wish to check this tab once you set up the subaward. Also, some subawardee institutions are participating in a Federal Demonstration Partnership (FDP) pilot program whose goal is to reduce the administrative burden associated with subawards. If the institution is included on this FDP Expanded Clearinghouse list, you will find the required administrative information for the performance site tab, and therefore will not need to request it. Finally, if you use GCO's NIH Competitive Application Subawardee Checklist, the contact person at the sub-award institution submits this information to you on the form but can opt out completing this section if the institution is on the FDP Expanded Clearinghouse list. The GCO checklist also includes the DUNS number (optional in NIH application for secondary sites) because InfoEd requires this unique identifier for all subawards.

Data enter this information on InfoEd > Performance Sites tab.

2. Resources and Facilities page

As per the NIH instructions, "If there are multiple performance sites, describe the resources available at each site." Obtain an additional Equipment statement, if applicable. "List major items of equipment already available for this project and, if appropriate identify location and pertinent capabilities."

Upload the Resources and Facilities page in InfoEd > Resources tab.

3. Biosketches for Key Personnel including Other Significant Contributors and Consultants

Upload the Biosketches into the "CV" sections in InfoEd > Personnel tab.

4. eRA Commons ID

Beginning with NIH competitive application due dates on or after January 25, 2022, all key personnel must include their eRA Commons ID in the application. **NIH is beginning to issue error messages rather than warnings and will reject your application if eRA Commons IDs are missing for key personnel.**

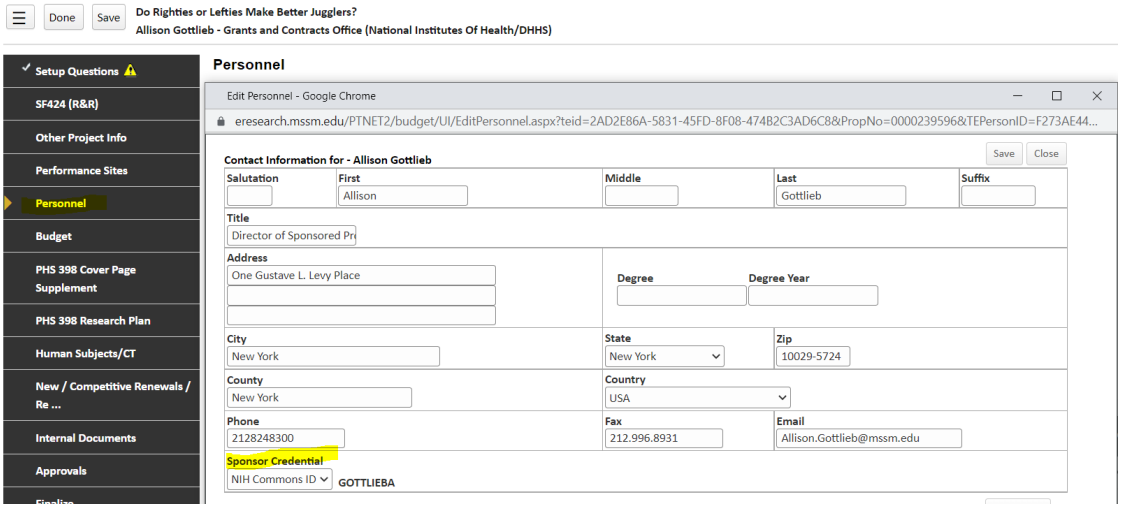
Subaward institutions must register their organization in eRA Commons and create their own eRA Commons IDs for their key personnel.

What Are the Options for Obtaining an eRA Commons Username (Commons ID) For a Senior/Key Person Who Isn't Affiliated With a Registered Organization? Please refer subaward institutions on your application to the "Option 1" instructions in this NIH link.
The GCO assumes that academic institutions that routinely submit NIH grants will already be registered. However, there is a concern that these institutions may not have signed up all their key personnel (e.g., consultant on their subaward project) with eRA Commons user names. An additional concern is that institutions that do not regularly submit grants will not register their organization.

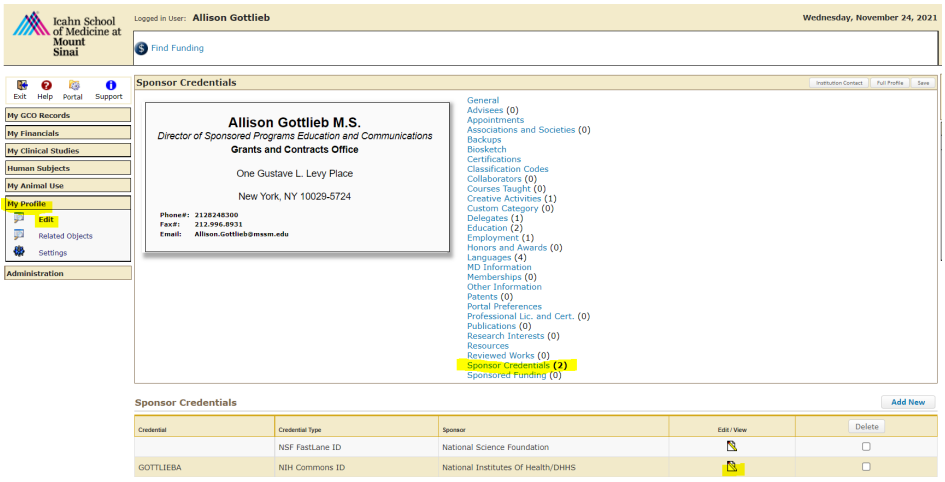
Add the eRA Commons ID in InfoEd

Please add in one of the two places.

1) Add the eRA Commons ID to the InfoEd record in "Sponsor Credentials" field in the "Personnel" tab of the project you are working on as per this screenshot below.



2) The eRA Commons ID can also be added directly to the investigator's "My Profile." Please see the "My Profile" snapshot below.



5. Letters of Support

As per the NIH instructions, "Obtain appropriate letters of support, including any letters necessary to demonstrate the support of consortium participants and collaborators such as Senior/Key Personnel and Other Significant Contributors included in the grant application. Letters are not required for personnel (such as research assistants) not contributing in a substantive, measurable way to the scientific development or execution of the project. Letters should stipulate expectations for co-authorship, and whether cell lines, samples or other resources promised in the letter are freely available to other investigators in the scientific community or will be provided to the particular investigators only. For consultants, letters should include rate/charge for consulting services and level of effort/number of hours per year anticipated. In addition, letters ensuring access to core facilities and resources should stipulate whether access will be provided as a fee-for-service."

Upload these letters in InfoEd > PHS398_Research Plan > Letters of Support section.

6. Inclusion Enrollment Report Data for Projects with Human Subjects, if applicable

If the Inclusion Enrollment Report (IER) form is required for your research, please obtain the data from the subaward site so you can add it to the form.

Data enter this information in InfoEd > Human Subjects/CT > Study Record > Inclusion Enrollment Report.

7. Multiple PI (MPI) Plan, if applicable

If this is a multiple PI grant and the Subaward PI is one of the MPIs, you must include the required plan in your NIH application. The GCO template, which includes additional language for grants with PIs at subaward sites, can be downloaded here.

Upload this section in InfoEd > PHS398_ResearchPlan > Multiple PI Leadership Plan.

8. Consortium/Contractual Arrangements

In this section of the application as per the NIH instructions, "Explain the programmatic, fiscal, and administrative arrangements to be made between the applicant organization and the consortium organization(s). If consortium/contractual activities represent a significant portion of the overall project, explain why the applicant organization, rather than the ultimate performer of the activities, should be the grantee."

The GCO recommends including the following information:

- For programmatic arrangements, adapt language that the subaward already provided in the SOW.
- For fiscal arrangements, state: "We will establish a standard subaward agreement which will allow ISMMS to issue payments to the site."
- For administrative arrangements, explain how the teams collaborate and communicate (e.g., weekly/monthly/yearly in person meetings and/or teleconferences.)

Upload this section in InfoEd > PHS398_ResearchPlan > Consortium/Contractual Agreements.

9. F&A Rate Agreement

Please obtain the subaward F&A Rate Agreement if the organization is not participating in FDP Expanded Clearing House Pilot? Click here to determine.

Please upload the agreement in InfoEd > Internal Documents tab.

10. Foreign Subawards

a. No New Foreign Subawards

Effective May 1, 2025, which is the date of NIH Notice, Updated NIH Policy on Foreign Subawards (NOT-OD-25-104) and until the details of the new foreign collaboration award structure are released, NIH will not issue awards to domestic or foreign entities (new, renewal or non-competing continuation), that include a subaward to a foreign entity. Please refer to the NIH notice for complete information Below are summary points and GCO recommendations:

1) July 2025 Competing Submission
   Please consider if a foreign subaward can be replaced domestically. If it cannot, in the Foreign Justification attachment clearly indicate how the subaward serves U.S. interests.
2) Current Awards that Received Funding for this Federal Fiscal Year Already
   No changes at this time. Changes will impact you next year.
3) Current Awards that Did Not Yet Receive Funding for this Federal Fiscal Year AND the RPPR is Already Submitted
   We await further guidance. Your award will likely be delayed and/or may skip funding this fiscal year. Please consider if the foreign subaward can be removed or replaced domestically. If yes, please reach out to GCO to discuss renegotiation of the award.
4) Current Awards that Did Not Yet Receive Funding for this Federal Fiscal Year AND the RPPR is Not Yet Submitted

Please consider if the foreign subaward can be removed or replaced domestically. If yes, urgently act on finalizing plans as part of preparing RPPR, and reach out to GCO to discuss renegotiation of the award. If no, submit as is, but make contingency plans if funding is disrupted.

You may be considering changing your current subaward to a consulting agreement. As a reminder, per the Uniform Guidance, it is the substance of the relationship, not the contractual vehicle, that determines if an entity qualifies as a subrecipient or consultant. In most cases, we cannot change a current subaward to a consulting agreement. Please refer to GCO's Subawardee, Consultant, and Vendor Determination Checklist for additional information.

b. Foreign Subawards Involving Human Subjects Research A*ctive on or Before* May 1, 2025
See NIH Notice Updated Implementation Guidance of NIH Policy on Foreign Subawards for Active Projects NOT-OD-25-130.

Summary:

- For foreign subawards involving human subjects research *active on or before* May 1, 2025 , the NIH has a temporary option of converting foreign subawards into administrative supplements.
- A permanent policy will be put in place, communicated to be 9/30/2025.
See NOT-OD-25-104: Updated NIH Policy on Foreign Subawards.
- ICOs may still renegotiate with the primary recipient to move activities to a domestic entity, remove the scope of the foreign component from the overall project scope, or bilaterally terminate the award.

GCO Recommendation:

Please initiate a dialogue with your AOR to discuss options.

c. Data Access Requirement for Foreign Subrecipients
In accordance with NIH notice NIH Final Updated Policy Guidance for Subaward/Consortium Written Agreements (NOT-OD-23-182), foreign subaward institutions must provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, to the primary recipient with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. Such access may be entirely electronic, but will be via a method determined by the Prime Institution.

Foreign subaward institutions must either use Mount Sinai's subaward letter of intent or include the equivalent language above.

D. Other Requirements and Guidance

1. Training Certification for Senior/Key Personnel on NIH Grants Submitting Other Support

To comply with NIH notice NOT-OD-25-133, subrecipient senior/key personnel submitting NIH Other Support provide certificate(s) of other support training completion or provide documentation from the subrecipient AOR that they have completed the training.

Starting October 1, 2025 under NOT-OD-25-133 senior/key personnel when submitting Other Support to the NIH, whether for Just in Time (JIT), as part of a Research Performance Progress Report (RPPR) submission (i.e., non-competing continuation), or as part of a prior approval request, must complete the training.

For additional information, please refer to GCO's Guidance document on Federal Research Security and NIH Other Support Disclosure Training.

2. Certification for Covered Individuals on Sponsored Project Applications Covered Under the CHIPS & Science Act

For deadlines on or after October 10, 2025 in compliance with the CHIPS and Science Act (C&S), all covered individuals on applications in which the agency is covered under C&S must complete the required Research Security training.

Compliance will be verified through the standard SOI language.

For additional information, please refer to GCO's Guidance document on Federal Research Security and NIH Other Support Disclosure Training. You may also refer to this CHIPS and Science Act of 2022 Summary Fact Sheet for the agencies listed and for further information.

3. Data Entry on InfoEd Budget and Personnel tabs

Enter the budget in InfoEd > Budget > Subcontract tab and the personnel in InfoEd > Personnel tab.

Click here for further InfoEd technical step by step instructions.

You can data enter the subaward budget and personnel in its entirety or follow the shortcut instructions in the following table.

Data Entry on InfoEd Budget and Personnel tabs				
#	**Technical System Type / Funding Agency Budget Type**	**Examples**	**Budget Tab Instructions** Enter the following budget information:	**Personnel Tab Instructions** Enter the names of the following personnel:
1	S2S / Federal Detailed	♦NIH New non-modular R01 (> $250,000 DC per yr) ♦NIH U01 Resubmission ♦DOD Competitive Renewal	1. All detailed and summary budget information as per funding agency instructions.	♦ All

2	S2S / Federal Modular	♦NIH New modular R01 (< or = to $250,000 DC per year) ♦NIH R21 Resubmission	1. Each key personnel (KP) **with % effort (no $s)** 2. Cumulative Direct Cost (DC) only; NO itemized costs 3. Facilities and Administrative Costs (F&A)	♦ Key Personnel (KP); do not enter non-KP staff (e.g., research coordinator)
3	Non-S2S/ All	♦NIH Non-Competitive RPPR SNAPSs (e.g., R01s, R21s) ♦NIH RPPR Non-SNAP (e.g., P50, U19) ♦NIH ASSIST New P01 grant ♦New Foundation grant ♦Non-Competitive Foundation Grant	1. Subaward PI only **with % effort (no $s)** 2. Cumulative DC only; NO itemized costs 3. Facilities and Administrative Costs (F&A) 4. Upcoming year's budget only	♦ Subaward PI only; do not enter other staff (e.g., co- investigator, research coordinator)

The Technical System Type in the table refers to the two InfoEd submission types:
1. System to System (S2S); 2. Non System to System (nonS2S).

For S2Ss, InfoEd is used to submit NIH and other federal sponsored projects to these agencies directly. You don't need to complete a separate agency application. For #s 1 and 2 in the above table, you need to enter more details because InfoEd exports this information into the SF 424 agency forms which are submitted to the extramural funding agency. The agency requires this information on their forms.

For NonS2Ss, InfoEd is used internally at ISMMS only. For # 3 in the above table when you are not using InfoEd to submit your project to the extramural funding agency, less information is needed on the InfoEd budget and personnel tabs.

4. Subawards on Subawards

The GCO discourages the use of subawards on subawards, which is defined as the process of a sub-recipient issuing a subaward to a third tier institution. Subawards on subawards will add unnecessary bureaucratic burdens and delays to your project. They also put Mount Sinai at risk for late filing of reports. The GCO understands that the desire to use subawards on subawards is often driven by scientific reporting lines. These scientific reporting lines can be preserved without adding extraneous institutional financial and administrative reporting lines. The direct subaward arrangement expedites both the research project as well as the receipt of funds. Please contact your designated Grants Specialist if you have any questions.

IV. Resources

NIH

- Refer to SF424 Application Guide for complete information on the NIH sections included above.
- NOT-OD-23-133: NIH Updated Policy Guidance for Subaward/Consortium Written Agreements
- NOT-OD-25-104: Updated NIH Policy on Foreign Subawards
- NOT-OD-25-130: Updated Implementation Guidance of NIH Policy on Foreign Subawards for Active Projects

- NOT-OD-25-133: NIH Announces a New Policy Requirement to Train Senior/Key Personnel on Other Support Disclosure Requirements
- NOT-OD-25-142: Update: No-Cost Extension Functionality in eRA

Federal
- CHIPS and Science Act (C&S)

GCO
- NIH Competitive Application Subawardee Checklist
- Subaward/Consortium Statement of Intent Template: ISMMS as the Prime Institution
- NIH Prior Approval Requirements

V. Significant Changes to this Document from Prior Versions

Date	Description
11/11/2025	Added two new sections and relevant resources 17. Certification of Senior/Key Personnel of NIH Sponsored Submitting Other Support in compliance with NOT-OD-25-133 18. Certification for Covered Individuals on Sponsored Project Applications Covered Under the CHIPS & Science Act in compliance with the CHIPS and Science Act (C&S). Renumbered all sections.
8/17/2025	Updated guidance based on these NIH Notices: 1. Update: No-Cost Extension Functionality in eRA NOT-OD-25-142 and 2. Updated Implementation Guidance of NIH Policy on Foreign Subawards for Active Projects NOT-OD-25-130. Added "Covered Individuals" to the Compliant Under ISMMS Policy subsection in the Certification of Compliance with HHS Financial Conflict of Interest (COI) Rules and Regulations Effective 8/24/2012 section, III.4.B.iii.
6/22/2025	Updated guidance based on these NIH Notices: 1. Updated NIH Processes for No-Cost Extensions NOT-OD-25-110 and 2. Updated NIH Policy on Foreign Subawards NOT-OD-25-104
12/17/2024	Updated InfoEd instructions link
2/11/2024	Updated InfoEd instructions link Added eRA Commons ID and DHHS Agreement sections
9/26/2023	Added Foreign Subaward section
7/5/2022	Added FDP template letter of commitment form as another acceptable option.

6/22/2020	Removed sIRB Reliance Statement, if applicable, in Section III.11. No longer required for competitive applications due 5/25/20 or later.
2/17/2020	Removed PHS COI certification for projects sponsored by applicable non-DHHS funding agencies
8/17/2019	Corrected typo Section III. 15 Modular grants are "< or = to $250,000 DC per year"
3/21/2018	Added sIRB Reliance Statement, if applicable, in Section III.11.
3/21/2018	Updated the Inclusion Enrollment Report data requirement, if applicable, in Section III.12.
4/11/2016	Added FFATA requirement in Statement of Work in Section III.A.2
4/11/2016	Added information about subaward institutions participating in FDP Expanded Clearinghouse pilot project In Performance site section in Section III.C.7
4/11/2016	Added information about "PHS 398 Inclusion Enrollment" form for applications with dues dates 5/25/16 and later in Section III.C. 11 and 12.
12/22/2015	Moved "3. Certification of Compliance with HHS Policy" from the "NIH Competitive Applications" section to the "All Application Types" section.
12/22/2015	Added the option to include a signed PHS 398 Face Page in lieu of SOI in Section III, "1. Statement of Intent (SOI)".
12/22/2015	Added the clarifying statement that documentation is a yearly requirement in Section III, "3. Certification of Compliance with HHS Policy".
12/22/2015	Updated the link to GCO's most updated policy document in Section III, "13. Multiple PI/PI Leadership Plan".
12/22/2015	Added "Subawards on Subawards" to Section III.