Office of Sponsored Research Services (OSRS)

RA Forum
March 2013

OMB Grant Reform
NIH Public Access Policy

1. All NIH-funded investigators must submit or have submitted for them to PubMed Central (PMC) their final, peer-reviewed manuscript.
2. Submittal should be made upon acceptance of publication.
3. The full text should be made publicly available no later than 12 months after the official date of publication.

Applicability

• This policy applies to peer reviewed articles that arise in whole or in part from NIH direct costs (FY2008 and beyond) that were accepted for publication on or after April 7, 2008.
• Compliance with the NIH Public Access Policy is a legal requirement, and a term and condition of an award.

Sanctions

• Effective Spring 2013, NIH will delay processing of non-competing continuation grant awards if publications arising from that award are not in compliance. NOT-OD-13-042 NOT-OD-12-160
Compliance Begins Before Publication

There are 4 possible methods for submission to PubMed Central.

What is the journal policy for NIH-funded works?
What submission method does the journal follow?
• Copyright agreement form
• Journal website—usually in instructions for authors or journal policies
• NIH Public Access Policy website
• Editor-in-Chief
• Editorial staff
• Ruth Lewis or Cathy Sarli

Documentation of Compliance

- PMCID (PubMed Central reference number)
  • Method A, B, C, and D forms of submission

  A PMCID is required for demonstration of compliance for works three months post publication and beyond.

In the interim, compliance can be demonstrated by:
- “PMC Journal – In Process”
  • Method A and B forms of submission only

OR:
- NIHMS ID (NIH Manuscript Submission system reference number)
  • Method C and D forms of submission

  Using “PMC Journal – In Process” is NOT accepted as documentation of compliance for works submitted via Method C or Method D forms of submission.
Compliance Management Using the My Bibliography Tool in My NCBI

“My Bib” in NCBI allows eRA Commons users to:

• Determine whether their publications are compliant with the Policy.
• Associate their NIH awards with publications.
• Assign delegates to manage their bibliography via My NCBI.

Initial Steps

• Each PI should:
  – Create a My NCBI account and link it to their eRA Commons account.
  – Assign a delegate to manage their My Bibliography account.
  – Have delegate create a bibliography containing all publications associated with an investigator’s name and grants (even if the PI is not an author).

• Once all publications are entered into My Bibliography, compliance status for each publication is automatically updated and can be monitored.
My NCBI Examples


Public Access Compliance: Non-compliant. No PMCID 3 months post publication.

NHMS ID: NIHMS16891
NIH Funding: No funding has been associated with this citation.


Public Access Compliance: Non-compliant. No PMCID 3 months post publication.

NHMS ID: NIHMS168911
NIH Funding: No funding has been associated with this citation.

NIH Public Access Policy

Public Access Compliance Monitor (PACM)

- PACM is an informational tool provided by NIH which lists articles it believes a grantee institution is responsible for which are out of compliance.

- “PACR” status is needed to obtain access to PACM. PACR status will be assigned to ONE person for each department.

- A “PACR Roles & Responsibilities” agreement must be signed.

- To obtain PACR status, contact Laura Langton at langton@wustl.edu.
NIH
- PublicAccess@NIH.gov (for questions)

WUSTL
- https://becker.wustl.edu/classes-consulting/specialized-expertise/nih-public-access-policy
RPPR Public Access Implementation
April 2013

• Use My NCBI now to track compliance with public access policy.

• Consider delegates to assist PIs with My NCBI and associate papers with awards today.

• Ensure compliance well before your annual reports are due to avoid last minute scramble.

WU Libraries Help with Compliance

• Guidance on how to comply.
• Locate journal policies.
• Provide third party submitter guidance and services.
• Assist with documentation of compliance.
• Contact publishers on behalf of NIH-funded authors.
• Help discover why no PMCID available.
• Provide workshops upon request.
Assistance

Questions about PMC, NCBI, status of publications?
Cathy Sarli, sarlic@wustl.edu
Ruth Lewis, rlewis@wustl.edu

Questions about compliance related to your award?
Laura Langton, langton@wustl.edu

OSRS Grants Update
General Reminders

- If the PI's application will result in an award, regardless of whether Institutional Signature is required, the application should be processed through OSRS Grant Team.
- Applications submitted through Grants.gov – sign up for updates to the appropriate FOAs to avoid any errors in submission.
- Please be mindful of 11PM deadlines (etc.) if OSRS (vs. the DA or PI) has to submit the application. Note that OSRS operates during normal business hours.
- PI needs to maintain effort during a no cost extension period.
- Revised Budgets need to be vetted through OSRS.
- NIH approval is required for any changes regarding the use of animals or humans.
What to Submit to OSRS Grant Team

Hard Copy Applications

- Cover Page
- Table of Contents
- Project Description
- Budget
- Budget Justification
- Projected PI and Co-PI CVs
- Letters of Support
- Application

Electronic Applications

- Cover Page
- Project Description
- Budget
- Budget Justification
- Letter of Support
- Application

For more information, please visit http://grantsandcontracts.wustl.edu/medadmin/gcsite.nsf/WV/FF34CD20BED744868625703500579DC6?OpenDocument
**PDS Enhancement**

- New Menu Item Under Proposal Development – Submit S2S
  - What is it?
    - A link to a dedicated server for the purpose of submitting applications via S2S.
  - Why is this option available?
    - Will only have S2S traffic, with goal of quicker submissions.
  - ‘Submit S2S’ and ‘Proposal Preparation’ will have the same functionality.

**Proposal Central Due Dates/Times**

- Each agency controls their own due dates/times.
- Due dates are always eastern standard time. If solicitation states 5PM EST – the application is due 4PM CST.
- Once the set due date/time expires, the SUBMIT button is immediately deactivated.
NIH UPDATE

NIH Research Performance Progress Report (RPPR)

- Implementation of the RPPR
  - Available since 10/19/2012.
  - At present, both RPPR and eSNAP formats can be used to submit continuation applications subject to Streamlined Non-competing Award Process.
    - Once the format is chosen (either RPPR or eSNAP – cannot be changed without Commons Help Desk assistance).
  - Similarities and differences between RPPR and eSNAP available at: http://grants.nih.gov/grants/rppr/rppr_vs_esnap.htm
NSF UPDATE

Increased Automatic Compliance Checking

- FastLane will be enhanced to automate compliance checking of all required sections of proposals as outlined in the NSF Proposal and Award Policies Guide (PAPPG) of the Grant Proposal Guide (GPG). The GPG—required sections of a proposal include:
  - Project Summary*
  - Budget and Budget Justification
  - Project Description
  - Current and Pending Support
  - References Cited
  - Facilities, Equipment and Other Resources
  - Biographical Sketch(es)
  - Data Management Plan*
  - Postdoctoral Mentoring Plan (if applicable)*

- The solicitation will dictate which sections are not required; however, the applicant must indicate as such by inserting text that states 'Not Applicable'.
- If non-compliant, the SPO (OSRS) will not be able to submit the application.

*These proposal sections are already being auto-compliance checked by FastLane.
Questions?