

DATE: August 5, 2010

TO: Office of Management and Budget

THROUGH: NIH Project Clearance Officer, OPERA

FROM: Carol Wigglesworth, Grants Policy Analyst
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SUBJECT: Amendment to the PHS 2590 Non-competing Continuation Progress Report Instructions
(OMB No. 0925-0001, expiration date 6/12/2012)

The PHS 2590 is the noncompeting continuation progress report required annually of PHS award recipients. It is necessary in order to receive continued funding for each noncompeting year of a project.

NIH developed the Streamlined Noncompeting Award Process (SNAP) in 1995 in order to simplify the noncompeting award process for low-risk awards (primarily awards under \$250K per year with carryover authority). The streamlined progress reports eliminates the routine submission of detailed budget information and requires that grantees answer three "SNAP questions" regarding changes in other support for key personnel, changes in level of effort for key personnel, and explanation of unobligated balances greater than 25%. SNAP also included business process changes, e.g., providing grantees with an extra two weeks to submit the progress report, and replacing the provision of specific Institutional Review Board and Animal Care and Use Committee approval dates with assurance that such review and approval was conducted. Approximately 95% of NIH awards are now issued under the SNAP provisions. (Non-SNAP awards are large scale, complex, multi-project grants (often with multiple subprojects), that do not have carryover authority, and require closer monitoring.)

In 2003, NIH created the electronic Streamlined Non-competing Award Process (eSNAP), originally pilot tested by members of the Federal Demonstration Partnership (FDP). eSNAP provides grantees with SNAP eligible awards the ability to submit the SNAP progress report electronically using the eRA Commons. Use of eSNAP has grown significantly in the ensuing years, and NIH estimates that as of June 2010 use of eSNAP was at approximately 80%.

Beginning with August 1, 2010, NIH implemented a policy mandating use of eSNAP for awards that are subject to the SNAP provisions. This implementation date allows NIH to electronically capture all SNAP progress reports eligible for funding in FY 2011, and is another step towards use of electronic systems for all NIH business processes. NIH's implementation of the Research Performance Progress Report (RPPR) will build upon the existing infrastructure and functionality of eSNAP.

The required use of eSNAP is cause for clarifications to the PHS 2590 instructions. Specifically, now obsolete information concerning paper SNAP progress reports is deleted, and instructions concerning mandated use of eSNAP are clarified.

The amended instructions also include the following routine updates: accommodation of the integration of a citation management tool (My Bibliography) with eRA Commons, and updated reporting

requirements for institutional training and career development awards in the instruction in the responsible conduct of research.

A copy of the revised instructions is attached. There are no changes to the information collected and no changes to the total burden hours associated with the PHS 2590, listed below.

Estimate of Burden				
Types of Respondents	Number of Respondents	Frequency of Response	Average Response Time	Annual Hour Burden
NIH Grantees	37,000	annually	15 hours	555,000

Thank you for your consideration of this amendment to the PHS 2590 Instructions.

Attachment: PHS 2590 Instructions