

SUPPLEMENTARY INFORMATION FOR NATURE 493, 588–589 (2013).

Funding agencies' position statements on duplicate grants

Following a Nature investigation into the frequency and handling of overlapping grant applications and awards, US funding agencies provided detailed responses about their positions on the matter — as a service to our readers, they are reproduced below.

National Institutes of Health

With regard to the situation in which a researcher requests funding for a project that is duplicated or overlapping with a project funded by another source, this type of overlap would be monitored and addressed in the pre-award stages.

NIH's review for potential duplication begins at the receipt and referral stage, immediately after the applications is submitted to NIH. Applications are reviewed against previous submissions to ensure an application is "new" with significant and substantial changes in content and scope rather than a resubmission of an earlier application. In addition to comparing a submission to previous applications, NIH also assesses overlap between two concurrently submitted applications. Essentially identical or identical applications can also be identified during Peer Review. Applications to the NIH are grouped by scientific discipline for review by individual Scientific Review Groups and not by disease or disease state. Thus, the reviewers can easily identify multiple grant applications for essentially the same project. The agency also has instituted a policy that requires Institutes and Centers (ICs) to perform a Special Council Review for well supported investigators who currently receive \$1 million or more in direct costs of NIH funding. This policy requires IC Council members to recommend consideration of funding for applications that afford unique opportunity to advance research which is both promising and distinct from other funded projects from the investigator.

After review, and if an application is recommended for funding, it undergoes administrative review. Documents requested at this time include those described in the Grants Policy Statement (NIH GPS) in the Just in Time Procedures and Other Support. The information found in the Other Support documents helps NIH staff and grantees with the identification of similar applications and duplicative research prior to the issuance of an award. Greater detail on Just-In-Time procedures and Other Support is provided below.

NIH also monitors duplication of effort in the post award phase, and procedures for this are found in the progress report instructions. NIH grantees are required to respond to the following question, "Has there been a change in the other support of senior/key personnel since the last reporting period?"; when submitting their annual progress report. If a previously active grant has terminated and/or if a previously pending grant is now active, a grantee should respond "yes" that active support has changed, then the grantee must explain changes as well as provided updated Other Support with the progress report.

KEY RESOURCES:

The Division of Receipt and Referral at the Centers for Scientific Review maintains policies and procedures that address the evaluation of unallowable resubmission and overlapping application for consultation: <http://public.csr.nih.gov/ApplicantResources/ReceiptReferral/Pages/Evaluation-of-Unallowable-Resubmission-and-Overlapping-Applications.aspx>.

The NIH GPS has policies regarding Similar, Essentially Identical, or Identical Applications under Section 2.3.9.4 : http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch2.htm#just_in_time_procedures.

With regard to policy references, Just-In-Time procedures and Other Support are described extensively in the NIH Grants Policy Statement (10/12) in Section 2.5.1, Just-in-Time Procedures: http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch2.htm.

For more information on NIH policies during the post-award phase, please consult section 2.2.5 Other Support (non-SNAP awards only); and section 2.1.2 SNAP Questions; in the Non-Competing Continuation Progress Report Instructions (PHS 2590): <http://grants.nih.gov/grants/funding/2590/phs2590.pdf>

NIH makes every effort to eliminate or amend overlap **regardless of the funding source** prior to the issuance of a Notice of Grant Award. NIH has extensive policies, procedures and guidance in place geared toward the extramural community and NIH staff that is designed to monitor and manage potential overlap in funding. It should also be noted that while agencies may fund health research on the same general topic, the precise methods and focus of the work could be quite different, reflecting the mission of the agency supporting it.

Our policies and procedures state that it is the responsibility of program and grants management staff to routinely review Other Support documentation (which includes all financial resources, whether Federal, non-Federal, commercial or organizational, available in direct support of an individual's research endeavors, including, but not limited to, research grants, cooperative agreements, contracts, or organizational awards, but not training awards, prizes, or gifts) to determine if there is budgetary, scientific, or commitment overlap. The Other Support information helps meet the goal of identifying and eliminating overlap to ensure there is no duplication of funding for scientific aims.

If overlap is found with other federal agencies, NIH staff may use other methods to determine potential duplication of funding this include inter-agency communication through interagency coordinating committees, discussions with colleagues at other agencies, and information disseminated at scientific conferences.

It may be helpful to clarify that there are three distinct types of overlap that NIH looks for in grant documentation:

a. Scientific overlap occurs when substantially the same research is proposed in more than one application; or is submitted to two or more different funding sources for review and funding consideration; or a specific research objective and the experimental design for accomplishing that objective are the same or closely related in two or more pending applications or awards, regardless of the funding source.

b. Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salary) are requested in an application but are already funded or provided by another source.

c. Commitment overlap occurs when any project-supported

personnel (including support staff and key personnel) has time commitments (percent effort) exceeding 100 percent, regardless of how the effort/salary is being supported or funded. (See: Section 2.5.1 Just-in-Time Procedures, Other Support http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch2.htm)

While the types of overlap are distinct, in some cases they may affect one another and may be some cause for confusion.

The level of scientific overlap can vary, meaning sometimes the entire research plan can be completely duplicative with a pending application under review or active award; in this case, the PI must negotiate with

NIH staff concerning which grant will be funded.

There may also be a partial duplication, where it will be necessary to modify the pending application, other applications, or the active award prior to NIH's funding the pending application. If scientific overlap is associated with budgetary or commitment overlap (occurs when duplicate or equivalent budgetary items (e.g., equipment, salary) are requested in an application but are already funded or provided by another source), budgetary negotiations by grants management staff may be in order.

National Science Foundation

When proposals are submitted to NSF, the proposer must fill out a cover page that asks them whether the proposal is being submitted to another federal agency. You can view NSF's proposal requirements in our Grant Proposal Guide, specifically Chapter IV: http://www.nsf.gov/pubs/policydocs/pappguide/nsf13001/gpg_4.jsp. The fourth paragraph on that link page specifies:

“NSF must be notified if any funding for the proposed project is received from another source or sponsor. If it is brought to NSF's attention that funding for a proposal to NSF has been accepted from another sponsor, NSF will send a withdrawal confirmation to the PI and the SPO without waiting for the official withdrawal notification.”

Department of Defense

The Department of Defense (DoD) US Army Medical Research and Materiel Command (USAMRMC) Congressionally Directed Medical Research Programs (CDMRP) uses multiple standard processes and communications with the Principal Investigator and institutional Business Official to minimize the likelihood of duplication of health research projects undertaken by other agencies. Financial regulations guiding recipient institutions are outlined in the Administrative and Cost Principles section of the General Application Instructions (<http://cdmrp.army.mil/funding/default.shtml>) accompanying each of the CDMRP program announcements used for soliciting research applications.

There are many points in CDMRP's science management model, including application submission, peer and programmatic review, and negotiation and monitoring of funded awards to identify and prevent overlap and duplication.

Application Submission: Duplication of research projects is difficult to assess from project titles and abstracts. Thus, for every research application, a comprehensive list of current and pending funding support for the principal investigator and all key personnel must be submitted to the CDMRP at the time of application submission. Specific instructions are provided in the General Application Instructions, and include “For all current and pending research support, include the title, time commitments, supporting agency, name and address of the funding agency's procuring Contracting/Grants Officer, performance period, level of funding, brief description of the project's goals, and list of the specific aims.” The applicants are also instructed to identify where the proposed project overlaps with other existing and pending research projects, or to state if there is no overlap. The instructions state that an updated current and pending support document will be required during award negotiations.

Scientific Peer and Programmatic Reviews: During Peer Review, the peer reviewers, who have extensive knowledge of the subject they are reviewing, determine if the research proposed has been done, if the research is the subject of another application to another funding agency, if the effort of the principal investigator and all key personnel are appropriate, and if the budget is justified. The peer reviewers consult the pending and existing support documentation provided with the application to assist with this process. Their comments are captured in the peer review summary statement and also as administrative notes, both of which are reviewed by the CDMRP Science Officer during award negotiations. Programmatic Review is the second tier of application

review, conducted by each program's panel of distinguished experts that sets the initial investment strategy, and ultimately recommends research projects for funding. These panels include representatives from other relevant federal funding agencies, such as the NIH, the CDC, and/or the VA. As part of the Programmatic Review, each panel evaluates if the research proposed is being or has been done, or if the research project has been submitted to another funding agency. All notations of potential overlap are further investigated by CDMRP Science Officers during award negotiations.

Negotiations and Research Award: After a project has been recommended for funding, the Principal Investigator and institutional Business Official receive a funding status notification letter. If recommended for funding, the funding letter states “To expedite the award process, please answer the post-submission questions found under the “Required Award Information” tab on the CDMRP eReceipt website (<https://cdmrp.org>). You and your institution are responsible for ensuring that there is no duplication of the science, budget, or level of effort in separately funded studies in which you were or currently are involved. If you received funding for any portion of this application from another source, or if any portion of the proposed work has already started, please indicate so under this tab.” eReceipt also queries whether the research project proposed in the application to CDMRP, in part or its entirety, has been submitted to another funding agency, and that information is forwarded to the CDMRP Science Officer managing the award.

The funding letter further directs the PI to submit several required award documents, including: “Updated details on all existing and pending support for yourself and key personnel, including the title of the project, goals, specific aims/tasks, estimated start date and end date, level of effort (percentage or calendar months) in the project, and point of contact at the funding agency.” The updated documents submitted during award negotiations are routed through and signed by the institution's Business Official who certifies that the information is current and accurate, and addresses any scientific or financial overlap.

The CDMRP Science Officer evaluates the updated current and pending research support for potential scientific overlap or level of effort over-commitment. The Science Officer also uses the CDMRP's internal grants management database, NIH's ERA Commons system, NIH Reporter (<http://projectreporter.nih.gov/reporter.cfm>), and the International Cancer Research Partnership (<http://www.cancerportfolio.org/index.jsp>) sites to investigate potential overlap between the DoD award

and other projects funded or submitted for funding to other federal or non-federal organizations. If duplication or overlap is found, the Science Officer coordinates with the Principal Investigator to delete or modify duplicative tasks and reduce funding as appropriate. If the proposed research project is duplicative in its entirety with another funded research project, the PI is required to withdraw the application from the DoD, or to relinquish the other funding.

Monitoring of Funded Research Awards: During the life of the funded

award, potential duplication and overlap is monitored during review of progress reports (annual and final, and for some awards, quarterly).

The recipient institution's Business Office is responsible for charging appropriate costs to the appropriate award instruments/vehicles. In compliance with OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations", institutions expending \$500,000 or more in a year of federal funds are audited annually by a third party auditor, and the results are filed at the Federal Clearinghouse.