

## EYE ON PI

### Frequently Asked Questions from the Division of Grants Policy, OPERA



This month, the *Nexus* turned to the OER's Office of Policy for Extramural Research Administration (OPERA) for answers to some of OPERA's recent most frequently asked questions...

#### **Who are "senior/key personnel" and how do they differ from "other significant contributors?" What about consultants?**

Senior/key personnel are defined as individuals who contribute to the scientific development or execution of a project in a substantive measurable way. The program director/principal investigator (PD/PI) is always considered senior/key personnel. The PD/PI may designate other senior/key personnel if they fit the definition. Biosketches, other support information, and level of effort greater than zero person months are all required of senior/key personnel named in the application.

Other significant contributors are those that are committed to contribute to the project, but without measurable effort (zero person months or "as needed"). Biosketches of other significant contributors are required; however, other support information is not.

A consultant is defined as an individual hired to give professional advice or services for a fee. Generally, a consultant is not considered senior/key personnel. Grantees should describe the services to be performed by the consultant(s) in their justification and include the number of days of anticipated consultation, the expected rate of compensation, travel, per diem, and other related costs for each. In those cases where a consultant may actually meet the definition of senior/key personnel, the applicant should list them as such and include the appropriate biosketch and other support information.

#### **Does a significant change in level of effort for senior/key personnel require the prior approval of the grants management official (GMO)?**

The NIH Grants Policy Statement requires prior approval of changes in status of

senior/key personnel who are specifically designated in the Notice of Award (NoA).

Change in status is defined as withdrawal from the project, absence for any continuous period of three months or more, or reduction of time devoted to the project by 25 percent or more from the level in the approved application. The PD/PI is always named on the NoA and when multiple PD/PIs are involved all are automatically named on the NoA.

NIH program officials use discretion in naming senior/key personnel other than the PD/PI(s) in the NoA. This does not diminish the scientific contribution to the project of the other senior/key personnel; it merely limits the number of individuals that are affected by the prior approval requirement to those specifically named on the NoA.

### **What about the Key Personnel Report in the PHS 2590 Non-Competing Grant Progress Report?**

There are several places where senior/key personnel are mentioned in the Progress Report. The PHS 2590 streamlined non-competing award process (SNAP) instructions request information on (1) changes in other support of senior/key personnel since the last reporting period, and (2) significant changes in the next budget period in the level of effort for the PD/PI or other personnel designated on the NoA from that which was approved for the project.

SNAP Question #1—changes in other support of senior/key personnel—refers to changes in active support of the PD/PI, and of all other personnel considered by the PD/PI to meet the definition of senior/key personnel (i.e., individuals who contribute in a substantive measurable way to the scientific development or execution of the project).

SNAP Question #2—significant change in level of effort—applies only to the PD/PI and other individuals designated on the NoA.

For both SNAP and non-SNAP Progress Reports a Key Personnel Report (form page 7) is also required. This report once again covers all individuals designated by the PD/PI as senior/key personnel. Remember to include biosketches in the Progress Report for any new senior/key personnel.