October 3, 2013

Colleagues,

The most significant question we've had since the shutdown is how to handle Grants.Gov (and other) proposals due during the shutdown. As you know, Grants.Gov remains available during the shutdown period. The key question is whether proposal deadlines that require use of Grants.Gov will remain intact (even if individual agencies aren't "retrieving" the submitted proposals for review), or whether agencies will grant extensions to deadlines that occur during the shutdown or shortly thereafter.

**DEADLINES THAT OCCUR DURING THE SHUTDOWN**
Agency guidance on this matter is inconsistent. Key agency information is excerpted below; we encourage you to monitor the SPA Shutdown website [http://www.ospaumn.edu/documents/Federal Shutdown2013.html] closely for the latest information available.

**NIH** says "For the duration of the funding lapse, applicants are strongly encouraged not to submit paper or electronic grant applications to NIH during the period of the lapse. Adjustments to application submission dates that occur during the funding lapse will be announced once operations resume."

**NSF** has said FastLane will be down, and that proposals submitted to Grants.Gov during the shutdown will not be retrieved or validated until after the shutdown ends. They further indicate "Once normal operations resume, NSF will issue guidance regarding any funding opportunities that have a deadline or target date that occurs during the government shutdown."

**DOD Congressionally Directed Medical Research Program (CDMRP).** CDMRP has notified us that they expect proposals to be submitted by the original published deadline (even if that deadline is during the shutdown) because Grants.Gov is open for business.

**CDC** has said, "If you are considering submitting an application for additional HHS federal assistance funding, please be advised, that the Grants.gov system will be operational and will be accepting applications from prospective grantees. HHS will take action on those applications for fully funded and excepted programs. For those programs which are non-excepted, the Grants.gov system will accept and store applications until such time as the responsible Department has the authority and funding to return to normal business operations." Note that CDC does not specify whether they will permit extensions to their deadlines after the end of the shutdown. To be safe, we recommend submitting by the original deadline.

**SPA Recommendation:**
**Preferred Option:** If the agency explicitly allows for applications to be held during the shutdown (such as NIH), submit your completed proposal to SPA based on the usual 5 days-in-advance-of-
deadline schedule. This will allow SPA time to review the application and work out any necessary corrections with the PI and departmental staff. Unless otherwise directed by the PI, SPA will (effective with proposals received by SPA on 10-4-13 or later) HOLD Grants.Gov proposals for submission until after the shutdown is over and then will submit the proposal as soon as agency systems become available post-shutdown. SPA staff will confer with PIs on their preference for proposals submitted to us earlier than 10-4-13. Please note: after SPA has reviewed the proposal and any needed corrections are complete, SPA will not confer again with the PI on these ready-to-submit proposals, but will instead submit them as quickly as possible after the shutdown. If the PI wishes to continue working on the science, please use the Alternative Option below.

If an agency has not explicitly indicated that it intends to extend its proposal due dates that fall during the shutdown period, then SPA recommends submitting the proposal based on the original deadline. In these cases, please specify on your PRF that you want the proposal to be submitted by the original deadline. PIs may, however, opt to use the alternative option shown below if they wish to assume the risk.

**Alternative Option:** If a PI desires to continue working on their proposal during the shutdown and the agency has said it intends to extend deadlines that occurred during the shutdown (e.g. NIH), the PI has the option to retain the proposal locally and continue working. In some cases, such as NSF Fastlane proposals, there is no choice but to wait, since the system is not available. PIs are responsible for monitoring deadline extensions issued by their agency after the shutdown is over to make sure that SPA receives the proposal in time to meet the internal 5 day review period (Grants.Gov) or 1 day period (other proposals). Exceptions to SPA’s 5-day review period for Grants.Gov proposals will be made should an agency issue a revised deadline that is within the 5 days immediately following the shutdown, but PIs need to know that SPA’s review in those instances may necessarily be limited. For all other post-shutdown regular or shutdown-adjusted due dates, the 5 day (or one day, as applicable) expectation will apply. SPA anticipates a very heavy volume of proposals, awards, and agency prior approval requests immediately after the shutdown, so any extra lead time for proposal review (beyond the 5 days) would be most appreciated.

**HOW WILL AGENCIES REVISE THEIR DEADLINES THAT OCCUR DURING THE SHUTDOWN?**

The answer is - we don't know. It seems likely that major agencies using electronic systems for submission, such as NSF and NIH, will select staggered deadlines (to avoid crashing agency or governmental servers) but will do so with as minimal date slippage as possible, so the peer review process can happen as close to original timelines as possible. If any Grants.Gov funding opportunity announcements had a "close" date during the shutdown, they will need to be adjusted by Grants.Gov staff so that the electronic system will allow applications to be accepted by the Grants.Gov servers. If agencies have similar validations in their own electronic systems, they may also require additional time. We don't know how this will affect new deadlines that agencies will set. SPA will immediately post all of the deadline guidance it receives from agencies.
WHAT ABOUT AGENCY PROPOSAL DEADLINES THAT OCCUR IMMEDIATELY AFTER THE SHUTDOWN IS OVER?

PIs should assume those deadlines apply. As new deadlines approach and the shutdown is still ongoing, PIs can use either the preferred option or the alternative option recommended by SPA, above.

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