

Australian Government

National Health and Medical Research Council

BUILDING A HEALTHY AUSTRALIA

NHMRC Grantee Variations Policy





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Introduction

A grant variation is a change to a grant. This may include changes to the Funding Period, for example through a delayed start date, a delay during the grant, a change to the end date, and/or changes to the research team, Research Activity or Administering Institution. There are specific circumstances where it is appropriate for an NHMRC grant to be varied. Refer to <u>NHMRC's Funding Agreement</u> for definition of terms.¹

NHMRC grants are awarded following rigorous peer review of an application, which may include:

- assessment of the Chief Investigator(s)' research achievements and impact
- quality of the research proposal
- overall feasibility of the application, including Chief Investigator suitability, research environment suitability, budget, and time period.

NHMRC's Funding Agreement states that "Funds may only be used for the Research Activity for which they were provided" (clause 7.1) and accordingly any proposed grant variations, including changes to the Research Activity or Funding Period, need to be reviewed and approved by NHMRC.

Principles

NHMRC may at its sole discretion approve or reject a request to vary a grant. In making its decision, NHMRC will consider each request to vary a grant under this policy relative to the following:

- the individual circumstances outlined in the variation request
- the grant opportunity guidelines under which the grant was applied for
- the fundamentals of the grant that were approved in the original peer review
- the best outcomes for the grant against its aims and objectives
- whether the grant will continue to align with the purpose of the grant opportunity
- · whether the grant will continue to achieve value with relevant Commonwealth money
- any other matters of which NHMRC is aware relevant to the grant, Administering Institution or the researchers.

In addition to the above, NHMRC requires the following:

- A variation request must be submitted to NHMRC via NHMRC's grant management system at least a month before the proposed date of effect to allow adequate time for review (requests for variations with retrospective effect will only be approved in exceptional circumstances).
- A variation request must not be used as a means to meet NHMRC eligibility requirements or to avoid budget adjustments, unless specifically allowed in the grant opportunity guidelines.
- By certifying a variation request, the Chief Investigator A and Research Administration Officer (RAO) confirm that all affected Chief Investigators agree to the variation, noting the impact it may have on their suite of grants and hence their eligibility to hold/apply for other grants.

¹ Or the relevant Grant Agreement under which the grant entered into (e.g. the Medical Research Future Fund Grant Agreement).



Note for RAOs

All variation requests are to be certified and submitted by the Administering Institution's RAO. RAOs are the first point of contact for all grant administration matters.

RAOs are to maintain a record of the reason for the proposed variations and any relevant supporting documentation. NHMRC may at any point ask to view such evidence, including evidence that all affected parties have agreed to the change.

NHMRC makes grant payments as per the relevant Schedule, and Administering Institutions will be required to manage the flow of funds in accordance with the varied arrangements. Budget adjustments may occur following the approval of a variation (e.g. a variation that shortens the Funding Period).

For variations that are within the specified timeframes stated in this policy, and are within scope of the grant opportunity guidelines under which the grant was applied for, NHMRC approvals may be automated provided the variation request is correctly entered in NHMRC's grants management system.

Note for Chief Investigators

Researchers are not to approach NHMRC for advice on how to manage variations. Where the circumstances for a variation request do not match those listed in this document, Chief Investigators are to consult with their RAOs who may contact NHMRC for clarification. NHMRC will manage exceptional circumstance requests on a case-by-case basis.

It is important for all Chief Investigators to note that variations that extend the end date of the Funding Period may affect their eligibility to apply for grants in future years depending on the suite of grants held.

Submitting a variation

The grantee variation process involves the following steps:

- 1. The Chief Investigator reviews this policy then creates, completes, certifies and submits the grantee variation request to their Administering Institution RAO using NHMRC's grants management system.
- 2. The RAO from the Administering Institution reviews the request in the context of this policy and certifies the grantee variation request in NHMRC's grants management system. The Administering Institution must maintain a record of, and keep, any relevant supporting documentation.
- 3. NHMRC reviews the request and makes a decision whether or not to approve (or may seek additional information if required). If necessary, the request will be forwarded to a panel with scientific expertise for a recommendation.
- 4. The RAO and Chief Investigator A are notified by email of the decision.
- 5. If the variation is approved, revised schedules are only issued if the grant has transferred to a different Administering Institution.
- 6. NHMRC's grants management system is updated where required, e.g. Funding Period dates, reporting milestones, and/or budgets may be updated.
- 7. If the variation is rejected, the RAO will be asked to confirm that the grant will continue as originally awarded or as previously approved.

Note that changes to the Funding Period will only be made in calendar month blocks of time.



Types of grantee variations

Types of grantee variations are listed below. RAOs and grantees should also refer to the grant opportunity guidelines under which the grant was applied for to determine eligibility and variation requirements.

Where a grantee variation request is not covered by the options outlined below, RAOs should email the details of the request to postaward.management@nhmrc.gov.au.

1. Defer commencement date

NHMRC grants are expected to commence on the Schedule commencement date.

Examples of circumstances where NHMRC may approve variations to defer commencement date are:

- when the commencement date has not passed by the date that NHMRC receives the variation request
- where payments against the grant have not yet commenced
- where institutional approvals needed at the commencement date are not in place
- where the Chief Investigator A has a contractual obligation that cannot be met in time to meet the Schedule commencement date
- where key personnel are taking up a temporary position in industry that will support building Australia's
 research capacity
- where there are visa issues affecting overseas relocation for Emerging Leadership Investigator Grants
- family-related or personal reasons, including reasons related to the birth and care of children
- where there has been a delay in recruiting key staff
- where there has been a delay in establishing arrangements with Participating Institutions.

NHMRC will allow up to 12 calendar months in total from the original commencement date for this variation. Variation requests exceeding 12 calendar months from the original commencement date will only be considered in exceptional circumstances.

The information required for this variation type includes:

- number of months for deferral
- reason for the proposed change.

2. Defer an in-progress grant and extended leave requests

Use this variation type to request:

- to defer a grant that has passed the commencement date
- to take extended leave
- to take parental leave
- a delay in relation to the performance of a Research Activity.

Examples of circumstances where NHMRC will approve this variation are as follows:

• family-related or personal reasons, including reasons related to the birth and care of children



- where Chief Investigator A is taking up a temporary position in industry that will support building Australia's research capacity
- where Institutional approvals are not in place as needed during the Funding Period.

NHMRC will allow up to 12 calendar months in total for this variation. Variation requests exceeding 12 calendar months will only be considered in exceptional circumstances.

The information required for this variation type includes:

- number of months deferral
- reason for the proposed change.

3. Extend end date

Where the Research Activity has not been completed, the Chief Investigator A may apply to extend the end date of the grant. Additional funds will not be provided. Funds that have not been spent by the current end date may be spent during the extension period. There is no separate approval required to spend these funds. Funds can only be spent on the Direct Research Costs of the Research Activity in accordance with the <u>Direct Research Costs</u> <u>Guidelines</u>.

NHMRC will allow up to 12 calendar months in total for this variation. Variation requests exceeding 12 calendar months will only be considered in exceptional circumstances.

The information required for this variation type includes:

- number of months extension
- reason for the proposed change.

4. Change in Full-Time Equivalent, Salary or Research Support Package (Investigator and People Support Schemes only)

This variation type only applies to Chief Investigators named under People Support and Investigator Schemes.

Use this variation type to request:

- change from full-time to part-time, part-time to full-time or part-time equivalent
- change in research support package
- change in salary as necessary.

These variation requests will be determined with reference to the grant opportunity guidelines under which the grant was applied for, e.g. whether FTE changes are allowed for professional and/or personal reasons.

The information required for this change includes:

- month of commencement for the proposed change
- reason for the proposed change
- type of change:
 - o current FTE and proposed new FTE
 - o proposed change to research support package



- o proposed change to salary
- duration of the proposed change (e.g. for X months or for the remaining duration of the grant).

5. Relinquish grant

Approval of this variation type will result in changes to the reporting milestones, in particular the due date of the Final Report and Acquittal Statement. Examples of circumstances where grants are relinquished include:

- where the Chief Investigator A requests a relinquishment and advises all other Chief Investigators of their request
- where the Administering Institution will no longer support the grant and the grant cannot be transferred.

The required information for this variation type includes:

- proposed date of effect
- reason for the proposed change.

6. Transfer Administering Institution

Examples of when NHMRC may approve a transfer to a new Administering Institution include:

- where the Chief Investigator A requests the transfer and both the relinquishing and new Administering Institutions agree to the transfer
- where the current Administering Institution will no longer support the grant.

An example of when NHMRC may not approve a transfer to a new Administering Institution:

 where the new Administering Institution does not demonstrate a capacity to support the grant for the remaining Funding Period.

The required information for this variation type includes:

- proposed date of effect
- reason for the proposed transfer
- confirmation from the new Administering Institution that it accepts the administering responsibilities for the grant. Note that the relinquishing RAO will need to obtain this from the new Administering Institution and retain a copy for their records. NHMRC may ask to view this evidence at any point.

Where NHMRC approves the request to transfer Administering Institutions, the following steps complete the transfer process:

- the relinquishing Administering Institution advises the new Administering Institution of the value of any unspent funds
- the new Administering Institution invoices the relinquishing Administering Institution for the value of the unspent funds
- the relinquishing Administering Institution pays the invoice raised by the new Administering Institution
- NHMRC issues a revised Schedule to the new Administering Institution for acceptance (this may occur before the invoice has been raised or paid); this Schedule will not include unspent funds from the relinquishing Administering Institution



- payments to the new Administering Institution will not commence until the new Schedule is accepted in NHMRC's grants management system
- the relinquishing Administering Institution submits the Transfer Acquittal statement to NHMRC disclosing the unspent funds that have been paid to the new Administering Institution.

7. Change to research plan

This variation type to change the research plan is where there is a change in the aims or objectives as specified in the application for the Research Activity and as approved in the peer review process for funding. Improvements to the research techniques used to achieve the research plan (e.g. new, cheaper or more accurate technique or technology becomes available) do not require a variation request.

NHMRC will only approve a change to the original or previously approved Research Activity in exceptional circumstances, or where the change results from an institutional ethics committee approval process.

Applications for approval to change partners included in peer reviewed applications will be considered on a case by case basis.

The required information for this variation type includes:

- details of exceptional circumstances
- details of how the proposed change will affect the completion of the grant in accordance with its peer reviewed objectives and outcomes in balance with the best outcomes for the grant
- proposed date of effect.

8. Change to Chief Investigators

Whilst Chief Investigators are expected to remain on the grant for the full Funding Period, a request for approval to remove, change or add Chief Investigators will be considered by NHMRC. NHMRC will not normally approve the addition of a new Chief Investigator unless it is for the reason of replacing a departing Chief Investigator.

Examples of circumstances where NHMRC may approve a change to Chief Investigators on a grant include:

- where NHMRC is provided with evidence that a change in the Chief Investigator's employment prevents them continuing in the peer reviewed Chief Investigator's role (e.g. the change of employment results in the researcher no longer working in same field/topic of research or the Chief Investigator A is no longer going to be based in Australia for 80% of the grant duration). Long-service leave, sabbatical or leave without pay will not be considered as changes in employment. If a Chief Investigator is unable to demonstrate that the employment change prevents their continuing to perform their peer reviewed Chief Investigator role, the Chief Investigator is expected to remain on the grant for the duration of the Funding Period.
- exceptional circumstances.

Changes to Chief Investigators for NHMRC grants may result in a budget adjustment.

The required information for this variation type includes:

- details of exceptional circumstances or evidence which demonstrates how a change in employment prevents the Chief Investigator from continuing in their peer reviewed role
- details of how the proposed change will not affect the completion of the grant in accordance with its peer reviewed objectives and outcomes in balance with the best outcomes for the grant



• proposed date of effect.

In addition, the Administering Institution must retain the following:

- confirmation from all affected Chief Investigators that they agree to the proposed change
- confirmation from new Chief Investigators that their addition to the team will not result in eligibility issues, and their Profile/CV section in NHMRC's grants management system is up to date.

9. Change to Associate Investigators

Associate Investigators are expected to remain on the grant for the full Funding Period.

However, Administering Institutions may approve a change to Associate Investigator membership on a grant, provided the change is not detrimental to the project and the Research Activity as described in the signed Schedule for the grant will still be undertaken.

The Associate Investigator change and the reason for change are still to be recorded in NHMRC's grant management system via a grant variation.

10. Change in supervisor

Administering Institutions may approve a change in supervisor provided the change is not detrimental to the project and the change and the reason for change are recorded in NHMRC's grants management system, and the Research Activity as described in the signed Schedule for the grant will still be undertaken.

Enquiries

Any enquiries about this policy should be directed to postaward.management@nhmrc.gov.au

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