

United States Department of of Food and **Agriculture** Agriculture

National Institute

National Institute of Food and Agriculture (NIFA) Federal Assistance **Policy Guide:**

Section III: Application Evaluation pp. 46-54

NIFA Office of Grants and Financial Management

April 21, 2021

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

III. Application Evaluation

A. Capacity Grants CAPACITY AWARDS

Capacity grant applications are reviewed to determine if all program, financial, and administrative requirements have been met and are current. All institutions receiving Smith-Lever 3(b) and (c), Smith-Lever Special needs, Hatch Act, Evans-Allen research, and 1890 Extension capacity grants must have an active and approved Plan of Work (POW) on file with NIFA. NIFA will notify the institutions when all requirements have been met or approved. If the eligible institution has met all programmatic and administrative requirements, capacity funding will continue to be released.

B. Competitive Grants COMPETITIVE AWARDS

NIFA evaluates competitive grant applications through a competitive process that is fair, equitable, timely, and conducted in an unbiased manner. Applications for NIFA competitive grants and cooperative agreements, including renewals, revisions, and continuations, are subject to peer review as required by the Agricultural Research, Extension, and Education Reform Act of 1998 (AREERA). NIFA solicits advice of peer scientists and other recognized specialists in the specific program areas to carry out the peer review process. A general overview of NIFA's competitive grant application process is available on the NIFA website

C. Initial Competitive Application Review COMPETITIVE AWARDS

NIFA's competitive review process consists of two parts: first, NIFA program staff conducts an initial review. A peer review panel conducts a second review. In the initial review, the application's responsiveness to the requirements of the RFA and all other administrative requirements are evaluated. Proposals that do not comply with the stated guidelines in the RFA may be rejected and not reviewed by the peer review panel. The Panel Manager may also participate in the initial review.

NIFA program staff receives all grant applications submitted to NIFA through Grants.gov. The program contact (NPL) for a particular program is identified in the RFA. Program staff conducts the initial

review of the application for compliance with all administrative requirements in the RFA. Applicants are notified of the review status of their application through email. Once the application is under review, application status updates will not be available through Grants.gov. Applications are reviewed for applicant eligibility. It is the responsibility of the applicant organization to select the individuals who have the appropriate expertise to manage the scientific and administrative aspects of the project. The qualifications of these individuals to complete the project will be evaluated during peer review and by the NPL and ADO.

NIFA program staff reviews applications to determine:

- Administrative compliance with all RFA requirements, including but not limited to required attachments;
- Whether the planned activities and expenditures are within the scope of the RFA and program; and

• Whether the institution's stated matching contribution meets the RFA requirements.

After the initial review, the NPL will convene a panel of peer reviewers to review the applications for compliance with the statutory requirements of the program and the scientific validity of the proposed project (7 CFR3430.31-37).

NIFA will reject the application without further review if an applicant is found to be ineligible or if the application does not meet published responsiveness criteria. When a grant is awarded, NIFA continues to monitor changes in recipient and project status to ensure continued eligibility throughout the duration of the award.

All incomplete and late applications and applications determined to be nonresponsive to RFA requirements will not be peer reviewed. An applicant may withdraw an application from consideration at any time before an award is issued. Successful applicants will be notified of additional information that may be required before an award decision is made.

D. Peer Review of Competitive Applications COMPETITIVE AWARDS

After the initial review by NIFA program staff, applications undergo a peer review. The peer review process ensures that NIFA funds proposals with high scientific merit that address the goals and requirements of the program. The NIFA peer review process uses independent reviewers with the appropriate skills, expertise, and experience necessary to evaluate applications. NIFA selects reviewers based upon their training and experience in relevant scientific, extension, or education fields, taking into account the following factors:

- The level of relevant formal scientific experience, technical education, or extension experience of the individual, as well as the extent to which an individual is engaged in relevant research, education, or extension activities;
- The need to include experts from various areas of specialization within relevant scientific, education, or extension fields;
- The need to include other experts (e.g., producers, range or forest managers/operators, and consumers) who can assess relevance of the applications to targeted audiences and to program needs;
- The need to include experts from a variety of organizational types (e.g., colleges, universities, industry, state and Federal agencies, and private profit and non-profit organizations) and geographic locations;
- The need to maintain a balanced composition with regard to minority and female representation and an equitable age distribution; and
- The need to include reviewers who can judge the effective usefulness of each application to producers and the general public.

Reviewers use the NIFA-established review criteria and make written recommendations on each application. Applicants receive de-identified reviewer feedback at the end of the review process.

1. Peer Review System (PRS)

Peer reviewers and potential peer reviewers use the Peer Review System (PRS) to update their personal information. Once selected to serve as panelists, PRS is used to complete and submit reviews. PRS can be accessed on the NIFA website. First-time users of PRS are prompted to create an account after receiving an invitation to review. The PRS system maintains a database of reviewers' educational information, areas of expertise, and availability to review. If selected as a panelist, PRS provides information on NIFA's conflict of interest and confidentiality policy, the program's evaluation criteria, submitted reviews, review scores of other panel members, and ad hoc reviews. Once complete, reviews are submitted to the NPL through the PRS system.

Visit the NIFA website for additional information.

2. Reviewer Selection

The NPL for the applicable program will assemble a panel of peer reviewers based on their knowledge, expertise, and experience in the program area. For most grant programs, a Panel Manager assists the NPL in panel organization and facilitation. For more details on the NIFA peer review process, visit the NIFA website.

3. Types of Review Panels

Peer review panels may be conducted onsite, virtually, or as a combination of the two. If a virtual panel is conducted, panelists will convene by telephone, internet, or both to discuss their reviews and provide recommendations on proposals to be funded. Submitted applications for review will be available to reviewers who do not have a conflict of interest through the PRS system. Virtual panels will be used when it is the best method of review for the particular program.

4. Operation of the Review Panel

The NPL and Panel Manager screen proposals carefully for completeness and assign them to panel reviewers for review who do not have a conflict of interest with the proposals and, when additional expertise is needed, to ad hoc reviewers. A minimum of three, but generally three to five panelists review each proposal. If needed for additional expertise, up to three ad hoc reviewers may also evaluate a proposal. In most cases, each panelist is assigned 12 to 20 proposals, for which they provide written reviews. During the review panel meeting, each panelist also provides an oral evaluation of the assigned proposals (7 CFR 3430.31-37). The operation of the review panel is covered in the NIFA Peer Review Process for Competitive Grant Applications Fact Sheet.

Reviewers will assess all proposals in accordance with the Evaluation Criteria identified in the RFA.

When U.S. Department of Health and Human Services (HHS) approval of research with human subjects is required, the recipient institution must ensure that those subject to HHS approval comply with the HHS regulations incorporated by reference into 7 CFR 1c, as well as the provisions not incorporated.

Other evaluative criteria, as required by the authorizing legislation or applicable regulations, may also be used in the review of applications. Following the evaluation and final ranking of each proposal, panel members write a "panel summary" for proposals they reviewed which reflects the panel consensus. It details the salient points of the panel's assessment of the strengths and weaknesses of the proposal. This review will be available to applicants, but the identity of individual reviewers will not be disclosed.

At the conclusion of the panel, the NPL and/or Panel Manager review the final panel ranking to determine the proposals to recommend for funding. The NPL and/or Panel Manager also review the budgets of the top applications to determine if all funding requests are appropriate. Generally, proposals are funded according to the panel recommendations until program funds are exhausted. For AFRI, there is also a statutory set-aside of funding to enhance or strengthen institutional capacity under the Food and Agricultural Science Enhancement (FASE) program. Visit the NIFA website for more details on the FASE program.

Throughout the paneling, the Panel Manager and NPL enforce the conflict of interest rules and ensure confidentiality is maintained. They ensure that panelists leave the room during review and discussion of applications submitted from their own institutions or from individuals with whom they have a conflict of interest. The Panel Manager and NPL also emphasize confidentiality regarding all matters concerning applications, review, recommendations, ranking, and panel composition, and that confidentiality must be maintained outside the panel meeting room and after the panel meeting has adjourned.

5. Confidentiality

Confidentiality is critical to ensuring the integrity of the peer review process. The identities of reviewers will remain confidential to the maximum extent possible. The names of reviewers will not be released to applicants or to the public. Reviewer comments and discussions are not released. Names of institutions and individuals submitting applications, as well as application content and peer evaluations, will be kept confidential, except to those involved in the review process, to the extent permitted by law.

6. Conflict of Interest

During the evaluation process, extreme care is taken to prevent any actual or perceived conflicts of interest that may impact review or evaluation. For the purpose of determining conflicts of interest, the academic and administrative autonomy of

an institution shall be determined. Reviewers are expected to be in compliance with NIFA Conflict of Interest Guidelines. A conflict of interest might arise when the reviewer, or an immediate family member of the reviewer: has been associated with the applicant or applicant organization within the past 2 years as an advisor or advisee, co-author or collaborator, owner, partner, officer, director, employee, or consultant; has any financial interest in the applicant or applicant organization; is negotiating for, or has an arrangement, concerning prospective employment (2 CFR 200.318(c)(1)).

Individuals involved in the review process may not participate in any aspect of the proposal evaluation if they have a spouse, child, sibling, parent, partner, close friend, or otherwise have a relationship that might affect judgment, or could be seen as doing so by a reasonable person familiar with the relationship.

These rules apply to everyone involved in the review: the agency's program staff, the Panel Manager, panelists, and ad hoc reviewers. When a proposal comes up for discussion during panel, any panelist with a conflict of interest must leave the panel room or exit the discussion forum and not participate in review, discussion, or ranking of that proposal. Similarly, a Panel Manager or NPL who has a conflict of interest with a proposal may not participate in any aspect of the review for the proposal, including assigning reviewers or being present during panel discussion. Reviewers can identify a conflict of interest issue in the PRS system prior to the review of proposals.

During the peer evaluation process, NIFA takes extreme care to prevent any actual or perceived conflicts of interest that may impact review or evaluation. See the Peer review process for competitive grant applications document on the NIFA website for further information about conflicts of interest as related to the peer review process.

E. Evaluation Criteria COMPETITIVE AWARDS

1. Application evaluation criteria

To ensure any project receiving funds from NIFA is consistent with the broad goals of the funding program, the content of each proposal/application submitted to NIFA will be evaluated based on the set of review criteria specific to each program that is detailed in the RFA. The NPL develops, adopts, adapts, or otherwise establishes the criteria used to evaluate proposals. It may be appropriate for the NPL to involve other scientists or stakeholders in the development of criteria, or to extract criteria from legislative authority or appropriations language. The review criteria are described in the RFA and will not include criteria concerning any cost sharing or matching requirements, per section 103(a)(3) of AREERA (7 U.S.C. 7613(a)(3)); 2 CFR 200.306(a). All reviewers use the evaluation criteria listed in the RFA to evaluate applications.

2. Other review criteria

Before a final funding decision is made, the following factors will also be considered:

- Commitment of sufficient effort to the project
- No scientific, budgetary, or commitment overlap. Scientific overlap occurs when the same research is proposed in more than one application or a specific research objective and the research design for accomplishing the objective are the same or closely related in two or more applications or awards. Budgetary overlap occurs when duplicate or equivalent budgetary items (e.g., equipment, salaries) are requested in an application but already are provided by another source. Commitment overlap occurs when an individual's time commitment exceeds 100 percent (i.e., 12 person months), whether or not salary support is requested in the application. Overlap, whether scientific, budgetary, or commitment, is not permitted. Any overlap will be resolved by NIFA with the applicant and the PD/PI at the time of award. NIFA will not make awards in support of projects that are already funded.
- Certification of Institutional Review Board (IRB) Approval. If the proposed project involves human subjects' research, the certification date of IRB review and approval must be submitted. Pending or out-of-date approvals are not acceptable.
- Verification of Institutional Animal Care and Use Committee (IACUC)Approval.
 If the proposed project involves research including live vertebrate animals, the verification date of IACUC approval along with any IACUC-imposed changes must be submitted.
- Human Subjects Education Requirement. If the proposed project involves human subjects in research, certification that any person identified as senior/key personnel involved in human subject's research has completed an education program in the protection of human subjects must be submitted.
- Human Embryonic Stem Cells (hESCs). If the proposed project involves hESCs and the applicant did not identify a hESC line from the NIH Human Embryonic Stem Cell Registry in the application, the information should be submitted to the Registry.
- Other information as requested by NIFA.

F. Non-competitive application review

A NIFA grant program may be established by either authorizing legislation and/or appropriations to specifically support a designated institution or set of institutions for particular research, education, or extension topics of importance to the nation, a state, or region. Although funding for these projects or activities is awarded noncompetitively, they are subject to the same application process, award terms and conditions, Federal assistance laws and regulations, reporting and monitoring requirements, and postaward administration and closeout policies and procedures as competitive Federal assistance programs, unless otherwise provided. All noncompetitive applications recommended for funding must be reviewed by the NPL and, as required, other Departmental and NIFA officials (7 CFR 3430.35).

The panel's proposal rankings are advisory to NIFA and do not constitute the ultimate funding decision. Favorably ranked proposals recommended for funding are submitted by the NPL to OGFM for further review prior to an award determination being made.

G. Pre-award Review and Risk Assessment ALL AWARDS

Pre-award review may include (as applicable): review of OMB-designated repositories of government-wide data; assessment of risk, including cost analysis of the project/program budget, assessment of the applicant's management systems, review of the project budget, and history of performance; the applicant's ability to effectively implement statutory, regulatory, or other requirements, and confirmation of applicant eligibility or ensuring continued application eligibility (continuation awards). Pre-award reviews also follow the Uniform Guidance, 2 CFR 200.206.

Although these reviews and determinations occur before NIFA makes an award, recipients must continue to comply with eligibility and public policy requirements and maintain adequate management systems. The pre-award process for non-competing continuation awards is a streamlined version of this process.

- Review of OMB-designated repositories of government-wide data ALL AWARDS NIFA's Office of Grants and Financial Management (OGFM) will review SAM and the Federal Awardee Performance and Integrity Information System (FAPIIS) web databases prior to making an award to determine whether an entity is registered in SAM, as well as whether there are any reports in FAPIIS and to ensure the entity is not on the excluded parties/suspension and debarment list.
- 2. Cost Analysis COMPETITIVE AWARDS
 - Cost analysis is the review and evaluation of each element of an applicant's costs to determine reasonableness, allocability and allowability. Cost analysis involves obtaining cost breakdowns, validating cost data, evaluating specific elements of cost, and examining data to determine the necessity for, and the reasonableness and allowability of, the costs included in the application budget. The extent of cost analysis will depend on the type of funding instrument and award mechanism, the complexity of the project, prior experience with the applicant, and other factors. The amount of NIFA funding is based on reasonable and allowable costs consistent with the principles of sound cost management, considering the program priorities, constraints on the growth of average grant costs, and available funds.
- 3. Financial and Other Management Systems Analysis COMPETITIVE AWARDS
 In addition to considering the specific information provided in the application, the
 Authorized Department Officer (ADO) determines the adequacy of the applicant's
 financial and business management systems that will support the expenditure of,
 and accountability for, NIFA funds. When an applicant has had no prior Federal
 grants or cost-reimbursement contracts, the ADO may review the applicant's
 financial management and other management systems before an award is made, or
 within a reasonable time after the award, to determine their adequacy and
 acceptability. For an applicant with prior NIFA or other Federal cost-reimbursement

awards, the ADO may review recent audit reports and other available information to determine whether the applicant's management systems meet the standards established in 2 CFR 200.302 and 7 CFR 3430.42, as appropriate.

For grants to institutions of higher education, hospitals, and other non-profit organizations, recipients must relate financial data to performance data and develop unit cost information when practical. The recipient's financial management system must meet the following requirements (2 CFR 200.302):

- Accurate, current, and complete disclosure of the financial results of each
 Federally-sponsored project or program in accordance with the reporting
 requirements set forth in 2 CFR 200.328-329. If a Federal awarding agency
 requires reporting on an accrual basis from a recipient that maintains its
 records in a manner other than on an accrual basis, the recipient is not
 required to establish an accrual accounting system. These recipients may
 develop such accrual data for required reports on the basis of an analysis of the
 documentation on hand.
- Records that identify adequately the source and application of funds for Federally-sponsored activities. These records must contain information pertaining to Federal awards, authorizations, financial obligations, unobligated balances, assets, outlays, income and interest.
- Effective control over and accountability for all funds, property, and other assets. Recipients must adequately safeguard all assets and make sure they are only used for authorized purposes.
- Comparison of outlays with budget amounts for each award. Whenever appropriate, financial information should be related to performance and unit cost data.
- Written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the issuance or redemption of checks, warrants, or payments by other means for program purposes by the recipient.
- Written procedures for determining the reasonableness, allocability, and allowability of costs in accordance with the provisions of the applicable Federal cost principles and the terms and conditions of the award.
- Accounting records including cost accounting records that are supported by source documentation.

The ADO will advise the applicant if additional information is required. On the basis of the review results, the ADO will determine the need for any corrective action and may impose special conditions on the award. The ADO also will oversee the recipient's systems as part of its routine post-award monitoring.

4. Submitting Revised Documents COMPETITIVE AWARDS

The applicant may be asked to submit additional information (such as an updated

budget or "other support" information or verification of IACUC review) or to undertake certain activities (such as negotiation of an indirect cost rate) in anticipation of an award. However, even at this point in the process, such requests do not guarantee that an award will be made. Following review of all applicable information, NIFA approving and business management officials will determine whether an award can be made, if special conditions are required, and what level of funding is appropriate.

When requested by NIFA as part of the pre-award process, PD/PIs and the AR should discuss potential changes in scope with the NIFA NPL and revise the Project Summary/Abstract, Specific Aims, and/or other sections of their application, as appropriate. Once all issues are resolved, applicants should submit the revised document, as permitted, to the appropriate NIFA individual as a PDF file. All revised application information submitted to NIFA must be approved by an AR.