1. Overview

National Institutes of Health (NIH) grants policy allows the submission of certain elements of a competing application to be deferred for certain programs and award mechanisms until an award is anticipated as referenced in the NIH Grants Policy Statement [see section titled Just-In-Time Procedures under Completing the Pre-Award Process]. These elements, that can be submitted Just-in-Time by the applicant when requested by NIH, include:

- Other Support – specific requirements
- Certification of Institutional Review Board (IRB) Approval of the project’s proposed use of human subjects (when applicable)
- Verification of Institutional Animal Care & Use Committee (IACUC) Approval of the project's proposed use of live vertebrate animals (when applicable)
- Evidence of compliance when the education in protection of human subjects is a requirement.
- Verification of Facilities and Administrative (F&A) rate agreement
- Confirmation EIN

2. Purpose

To outline expectations and requirements for submitting Just-in-Time (JIT) information and to provide guidance to faculty and staff regarding the process to successfully respond and submit information to NIH.

3. Who Must Comply

Principal Investigators
Project Personnel/Staff
Deans Directors, Chairs and Department Heads
Department Personnel
Business Managers
Research and Sponsored Programs
Office for Research

4. Definitions

Other Support: Other Support includes all resources made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant. See guidance for examples of what should be included.

5. Procedure

If a Just-in-Time (“JIT”) submission is required, Principal Investigator (PI)/Project Director will be notified by NIH Grants Management Specialist directly, which will allow the PI to generate and upload any necessary documentation into eRA Commons for submission. NIH advises recipients to not respond to automated messages sent by eRA commons or to JIT hyperlinks that appear automatically in eRA Commons without receiving an e-mail from the Grants Management Specialist. When the PI
receives the JIT request, a copy should be forwarded immediately to the appropriate RSP Grants Specialist. Once the PI has uploaded the required information, the RSP Grants Specialist should be notified by email that the JIT is ready for final review. If the JIT is amenable for submission, the RSP Grants Specialist will then submit on behalf of the investigator and the University.

JIT is typically time sensitive information that was not submitted as part of the application. Often there is little time to respond to these requests completely; for example, human subjects or vertebrate animal protocol approval can take a substantial amount of time from application to protocol approval. If there is not enough time to provide all JIT information by the deadline provided, NIH may issue awards with restrictions. This practice has become more and more common. These awards are set up and held until the restriction is removed. Please note funds cannot be expended on award categories for which a restriction is applied. Other sponsors may choose the hold off making an award until they have received all protocols and required approvals. To assist with timely approvals, PI’s should submit protocols for approval once they are notified the proposal is in a fundable range.

If you have any questions/concerns regarding any of the information included herein, please contact your RSP Grant Specialist for further assistance.

6. Roles and Responsibilities

| Department Personnel | • Support the current PI with the request for Just-in-Time  
|                      | • Provide guidance on Department/School policy for JIT review. |
| Principal Investigators | • Forward Just-in-Time notice to RSP Grants Specialist once received.  
|                         | • Complete Just-in-Time documentation request in eRA commons and notify RSP Grants Specialist when complete.  
|                         | • Make sure to follow specific guidelines for content and formatting (Other Support documentation)  
|                         | • Ensure timely submission or required compliance protocols |
| Research and Sponsored Programs | • Review documentation to make sure if conforms to University and Sponsor guidelines.  
|                                      | • Submit Just-in-Time documentation as requested by sponsor either via eRA commons or by e-mail. |

7. Resources
   a. NIH Policy Statement JIT  
   b. Research & Sponsored Programs website