

CLEAR Meeting

Central & Local Exchange for Effective Administration of Research

Presented by Sponsored Research | July 9, 2026

Agenda

- Announcements
 - Proposed federal policy changes
 - SR year-end operations
- Pre-Award Updates
- Complying with Federal Public Access Policies
- Sponsored Research Agreements

*Please join SR colleagues for networking
at Luna's Pub after today's meeting*

Proposed Federal Policy Changes

- Proposed Uniform Guidance Revisions (effective 10/1/26)
- NSF draft Guidance on Financial Assistance (GFA) to replace Proposal and Award Policies and Procedures Guide (PAPPG)
- NIH proposal to limit the number of research project grants per PI (NOT-OD-26-086)

Sponsored Research (SR) and Accounting Services for Research and Sponsored Programs (ASRSP) are partnering together and will notify the community of any implemented changes impacting research administration policies and procedures.

SR Year End/August Operations

- **Award Setup**

- Before August 14: Awards with completed ancillary reviews for outstanding items will be setup
- After August 14: Awards with outstanding items will be setup with budgets restricted and will require an AMR after September 1 to complete setup
- All notices of award without SR cc'd should be sent to SponsoredResearch@northwestern.edu

- **Just-in-time (JITs)**

- SR will route to departments as promptly as possible
- SR will review and submit completed responses

- **Award Modification Requests (AMRs)**

- AMRs typically reviewed in order of submission
- Time sensitive AMRs with a deadline must:
 - Include deadline in short title of AMR
 - Upload sponsor communication with deadline as supporting documentation
- Contact Maura Cleffi with any concerns (m-cleffi@northwestern.edu)

Pre-Award Updates

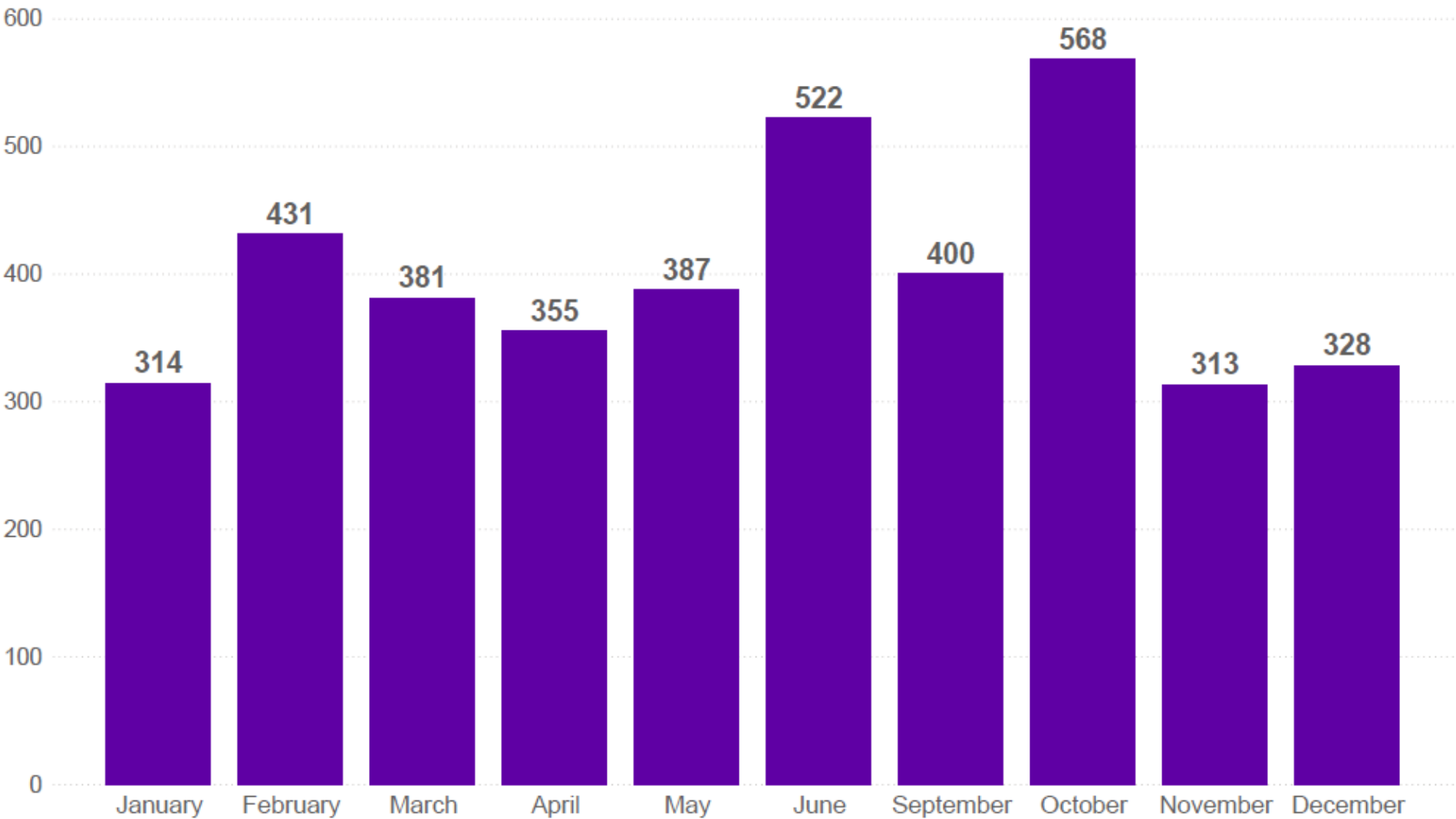
Carrie Holbo, Director of Pre-Award & Award Management

FY2026 Proposals To Date

Proposal Type	Submissions
New	3,067
Continuation (Progress Report)	516
Revision	197
Resubmission	110
Preliminary Proposal/LOI	66
Renewal	43
TOTAL	3999

*As of June 30, 2026
Excludes Industry Clinical Trials*

FY2026 Proposals To Date



NEW Pre-Award Resources



SPOT Course:
Proposal Development
& Submission

Proposal Checklist

Goals

-  Clearly outline what constitutes a **complete and compliant** proposal
-  Define Sponsored Research review **criteria**
-  Ensure **consistency** in reviewer comments
-  Enhance **onboarding resources**
-  Reduce send backs, resulting in **faster proposal submission**

Proposal Review & Submission SPOT Course

The screenshot shows a video player interface with a dark purple theme. On the left is a sidebar menu with the Northwestern Research logo and a list of course topics. The main video area displays a title card for 'Proposal Development & Submission' with a large 'P' icon and the Northwestern | SPONSORED RESEARCH logo. A 'pause' button is visible over the video. The bottom of the player features a progress bar and standard video controls like play, volume, and full screen.

Northwestern RESEARCH

Proposal Development and Submission

Proposal Development & Submission

Northwestern | SPONSORED RESEARCH

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1. Intro

- 1.1. Introduction ✓
- 1.2. Sponsored Project Lifecycle ✓
- 1.3. Course Description 🔒
- 1.4. Learning Outcomes 🔒
- 1.5. Why This Matters 🔒

pause

< PREV NEXT >

Proposal Review & Submission SPOT Course

Administrative Components



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The CERES Funding Proposal Record (FP)

- The record includes a summary called **the smart form** as well as various tabs to gather information on the budget, required sponsor documents, and compliance areas
- Captures information on the sponsor and sponsor type, the type of proposal, the funding mechanism, participating personnel, and the deadline and submission method



The Smart Form



Budgets



Sponsor Documents



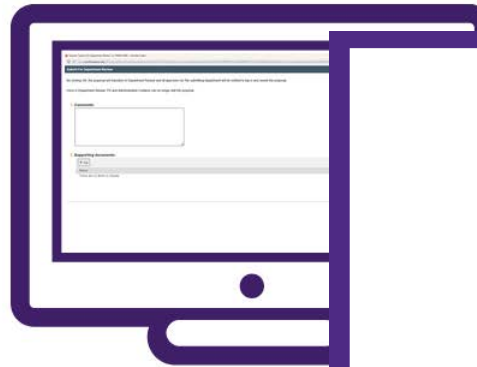
Compliance Areas

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Proposal Review & Submission SPOT Course

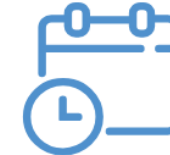
Best Practices

- 1 Create a CERES funding proposal as early as possible & include the funding proposal number in all communications
- 2 Check sponsor system access
- 3 Check website for current institutional information and letter templates
- 4 Add comments to the History tab to provide context



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Northwestern as Subawardee



If Northwestern is submitting a proposal package as a sub-awardee, you should include any relevant communication with the pass-through entity that assists SR in confirming required documents or forms, due dates, project title, and the approved budget allocation.

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Proposal Review & Submission SPOT Course

Applications Outside of CERES



**Assembled
Proposal**

- For submissions submitted outside of CERES, SR needs to see the full version of the proposal exactly how it will be viewed by the sponsor
- If a proposal is to be submitted outside of CERES and SR does not have access in the sponsor system, you must provide a full printout including 1) all web forms 2) all attachments

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Other Resources

Live Virtual SPOT Training Courses

featuring hands-on activities and interactive case studies

- Reading & Evaluating a Solicitation
- Proposal Budgets 101
- Proposal Budgets 102
- Award Set Up
- Proposal Development and Submission (NEW)

Next Dates TBA

Post-Submission Updates / Just-In-Time

In anticipation of the FY year end, we anticipate (hope!) for a high volume of requests for pre-award revisions/documentation (aka JIT).

Other Support

Banking information

Revised budgets

Supporting documentation

Language changes to abstracts and aims

IRB/IACUC approvals or status updates

Post-Submission Updates / Just-In-Time

Some JIT requests are more complex (e.g., they may require Ancillary reviews, coordination with other offices, etc.)

Representations & Certifications

Assurance forms

Allocation of IP rights agreements (INVO)

Risk mitigation (ECIC)

Documentation of institutional policies

Post-Submission Updates

Post-Submission Update Requested

Next Steps

View Funding Proposal

Printer Version

Create Funding Award

 Manage Ancillary Reviews

 Manage Tags

 Submit Post-Submission Update

 Add Attachments

Budgets	SF424 Summary	History	Reviewers	Attachments	Financia
Activity					
 Project with IRB or IACUC Protocol State Changed					
Related protocols were found for this proposal. RIT team has been notified about the state change.					
 NU Send JIT Compliance Notification					
 Post-Submission Update Requested					
JIT requested and due by 7/10/2026. Email request has been uploaded in CERES.					

@niddk.nih.gov>

@northwestern.edu>

estern.edu>

er :1R01DK144169-01A1

Dear Business Official:

The above referenced pending application falls within the NIDDK zone of funding **consideration** and has been selected for a potential award. Any commitments and expenditures made prior to the receipt of the official Notice of Grant Award is at the grantees own risk.

The information listed below must be submitted via eRA Commons for us to complete our review of this application and should be **submitted no later than July 15, 2026** to avoid delays in a potential award:

1. **Current and Pending (Other) Support:** Current and Pending (Other) support information is used to assess the capacity or any Conflicts of commitment that may impact the ability of the individual to carry out the research effort as proposed. The information also helps

JIT Reminders

- Highlight **deadlines** clearly
- Remind PIs not to respond directly; info must come from an **Authorized Organizational Representative**
- Follow **sponsor instructions** for Other Support (e.g. don't flatten SciENcv)
- Remember that PI/department must **upload documents to Commons**; SR will review and submit.
- Remind PIs that they must initiate requests in **Research.gov**

- Agency is significantly behind in issuing awards which may lead to **urgent requests**
- May involve **multiple steps** in Research.gov
- Read **PAPPG / Research.gov** resources
- If **budgets** are reduced, **scope** may have to change as well.
- Be cautious of implying **cost share** as it is prohibited.

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NEWS | 23 April 2026 | Correction [23 April 2026](#)

Delays have kept new NSF grants to a trickle – that could be about to change

The National Science Foundation is finally ready to distribute a spate of new grants, but it is also preparing substantial cuts to areas such as the biological and social sciences.

Outreach & Questions

Carrie Holbo

Director, Pre-Award & Award Management

carrie.holbo@northwestern.edu

Stephanie Logaras

Assistant Director, Pre-Award

s-logaras@northwestern.edu

Maura Cleffi

Assistant Director, Award Management

m-cleffi@northwestern.edu



**Meet your capsule
representatives!**

Complying with Federal Public Access Policies

Investigators' Dilemma

Pamela Shaw, Research Policy Librarian
NIH Public Access Compliance Reporter
Galter Health Sciences Library, FSM

Image content contributed by Karen Gutzman,
Head of Research Assessment and Communications
Content also provided by Kristi Holmes, Library Director
Galter Health Sciences Library

Federal Policy – Zero embargo



OSTP Memorandum – “the Nelson Memo”

“...no later than **December 31st, 2025**, to make publications and their supporting data resulting from federally funded research publicly accessible without an embargo on their free and public release”.

- Many agencies’ policies are in place, others are still being finalized



CODE OF FEDERAL REGULATIONS

Government Use License at [2 CFR 200.315\(b\)](#)

“The Federal agency reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes and to authorize others to do so. This includes the right to require recipients and subrecipients to **make such works available through agency-designated public access repositories.**”

- In place since late 1970s, but has risen to prominence (and been emended) under zero embargo policy

Example: The NIH Public Access Policy

2008 policy: 12-month embargo for deposit to PMC

2024 policy: zero embargo for deposit to PMC



What's at stake?

Funding at the individual and institutional levels may be affected or withheld

Example: NIH

NIH will delay processing of an award if publications resulting from it are not in compliance with the [NIH Public Access Policy](#).

- Please see [NOT-OD-12-160](#) for more details.

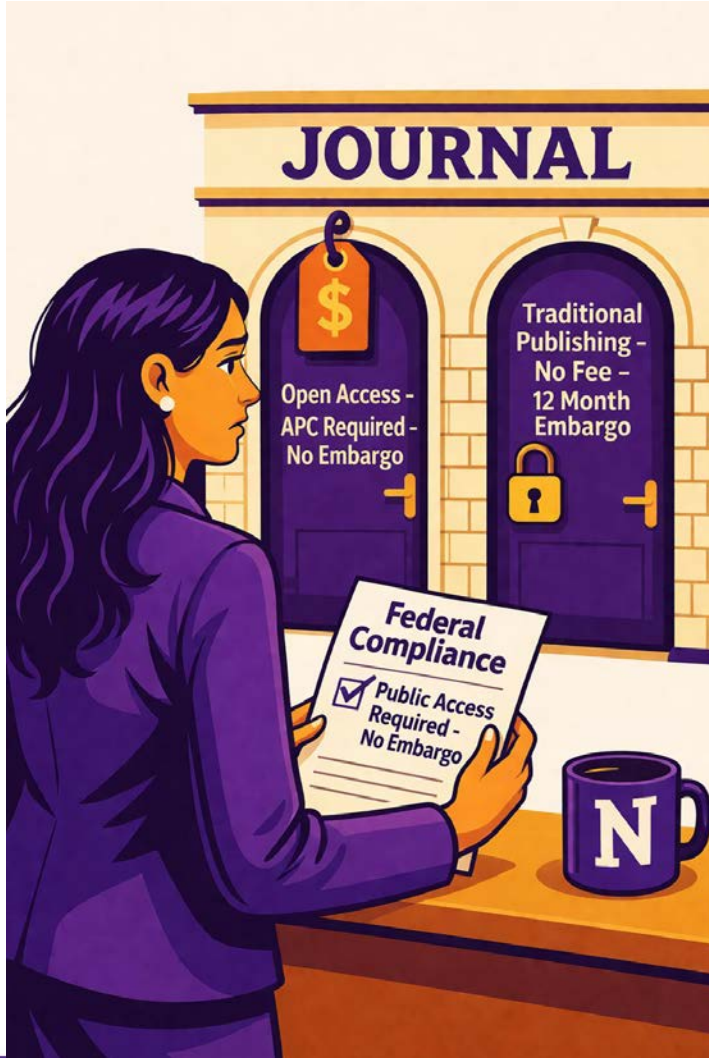
NU grantees must be made aware of the consequences of non-compliance (with any funder's policy).



Note: Noncompliance with the any NIH policy may be considered by NIH regarding **future funding decisions for the recipient institution** (as authorized in the NIH [GPS 8.5](#), Specific Award Conditions and Remedies for Noncompliance (Specific Award Conditions and Enforcement Actions)).

Conflict: Federal Law vs Publisher Copyright Agreements

Authors are caught in the middle



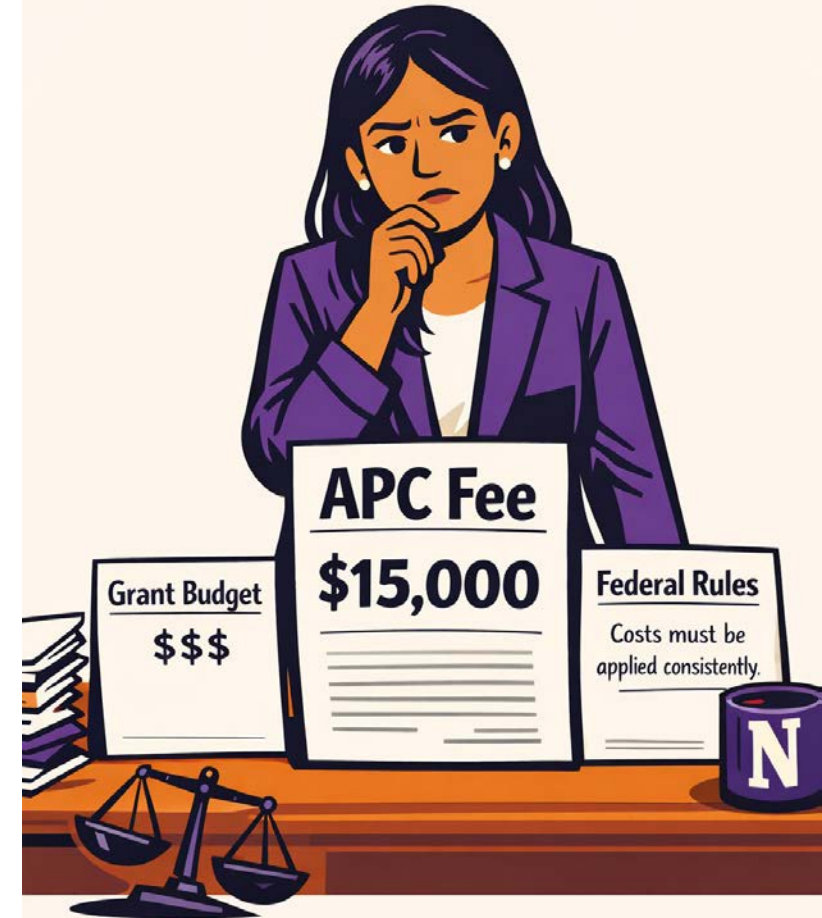
Authors feel pressured to choose from

1. Breaking federal law (publishing with an embargo under traditional publication model) or
2. Paying gold OA fees to bypass publisher embargoes or
3. Breaking the copyright agreement (depositing manuscripts to federal repositories with no embargo without paying OA fees or publisher permission, after signing an author agreement)

Publication costs (APCs)

Are allowable on awards under [2 CFR 200.461](#) at present, BUT

- The OMB [proposed a rule on May 29, 2026](#) that would, among many other proposed changes, change this regulation to rule that "...**publication costs** (including page charges, article processing charges (APCs), or similar fees such as open access fees for professional journal publications and other peer-reviewed publications) **are unallowable under Federal awards**"
- Even if this rule is not passed into law, there may be limits imposed on allowable APCs in the future (NIH)
- Some awards (e.g., NIH Training (T) awards) do not have a budget line for publication costs



Publication costs (APCs) – The dilemma

Are allowable on awards under [2 CFR 200.461](#)

- The (current) regulation stipulates that allowable charges must be “levied impartially on all items published by the journal, whether or not under a Federal award” - 2 CFR 200.461(b)(2)
- The federal government maintains that authors should not have to pay to comply with zero embargo requirements, BUT
 - Publishers traditionally impose gold open access APCs to “allow” authors to bypass standard journal embargoes
 - This is not new, but it has become more relevant under current federal zero embargo requirements
 - Investigators are required to choose zero embargo publishing options to satisfy federal funder requirements
 - Therefore, authors must pay the journal to bypass embargo



**This is not
allowable,
according to
2 CFR 200.461**



Subscription

☒ Publish as a subscription article

I will publish my article under the subscription model, making my final published article available to all journal subscribers, and to others through [Elsevier's free access initiatives](#) ↗.

I understand that I must wait 12 months before I can share my accepted manuscript publicly in my institution's or funder's repository. I can immediately share my accepted manuscript on non-commercial personal homepages and blogs, within my institution, and privately with collaborators. [Read Elsevier's article sharing policy](#) ↗ for more information.

Open access

☐ Publish as an open access article

National Institutes of Health funded my research. I will publish my article open access, making my final published article immediately available to everyone. I need to pay an APC (Article Publishing Charge).

I can immediately share my article publicly in my institution's or funder's repository, in accordance with the user license that I select. Further details on [Copyright | Elsevier policy](#) ↗.

Article Publishing Charge (APC)

List Price (excluding taxes)

USD 3,480.00



Where to publish?

New considerations for journal choice are necessary

There is currently no single resource to direct authors to these options

Green open access journals or PMC Journals (for NIH funded papers) are the best choices, but they are a small subset of all possible journal choices

- Galter Library maintains a [zero embargo green OA publisher list](#)
- [PMC Journals](#) can be found at the NLM site
- NU (or NU as a member of the Big Ten Academic Alliance) has [transformative agreements with some publishers](#) to reduce or waive gold OA fees in their hybrid journals

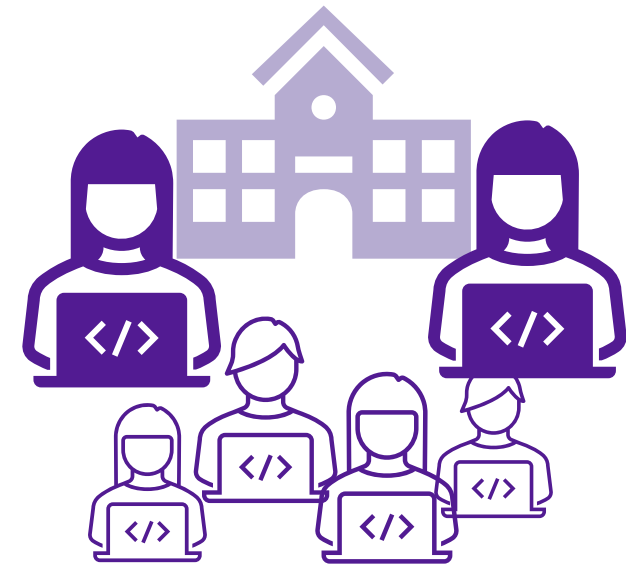


A New Working Group

A new Public Access Working Group has been formed

Members from:

- Office for Research
- Northwestern Libraries (NUL and Galter)
- NUIT Research Computing



Goals:

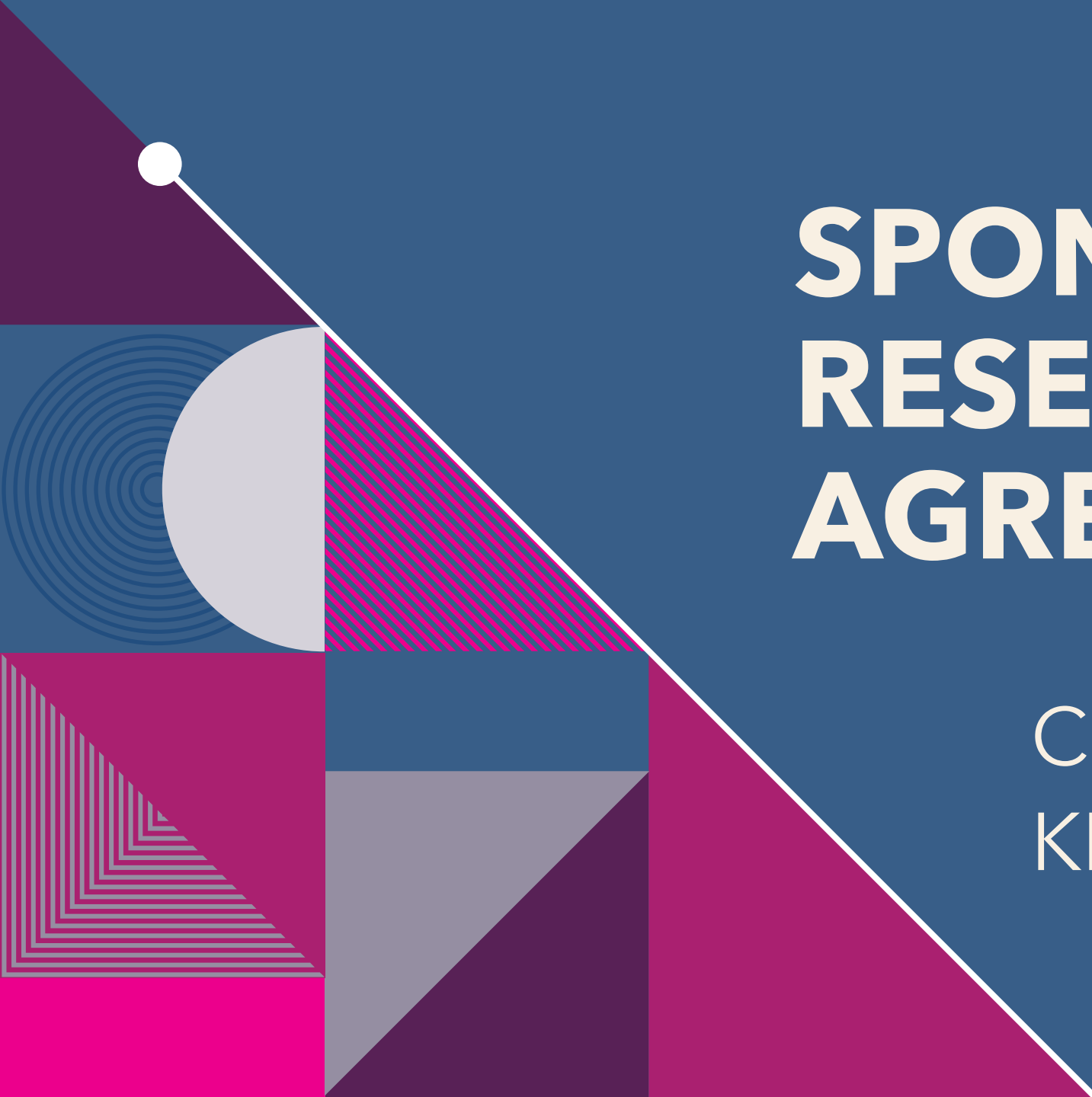
- ✓ Create finding tools for journal information and publishing agreements (for APC discounts)
- ✓ Create a decision support tool for publishing under federal funding requirement
- ✓ Create a central website resource for discovery of university and external guides, these new tools, and information for public access compliance for publications and data

Resources at Northwestern

From the libraries and NUIT

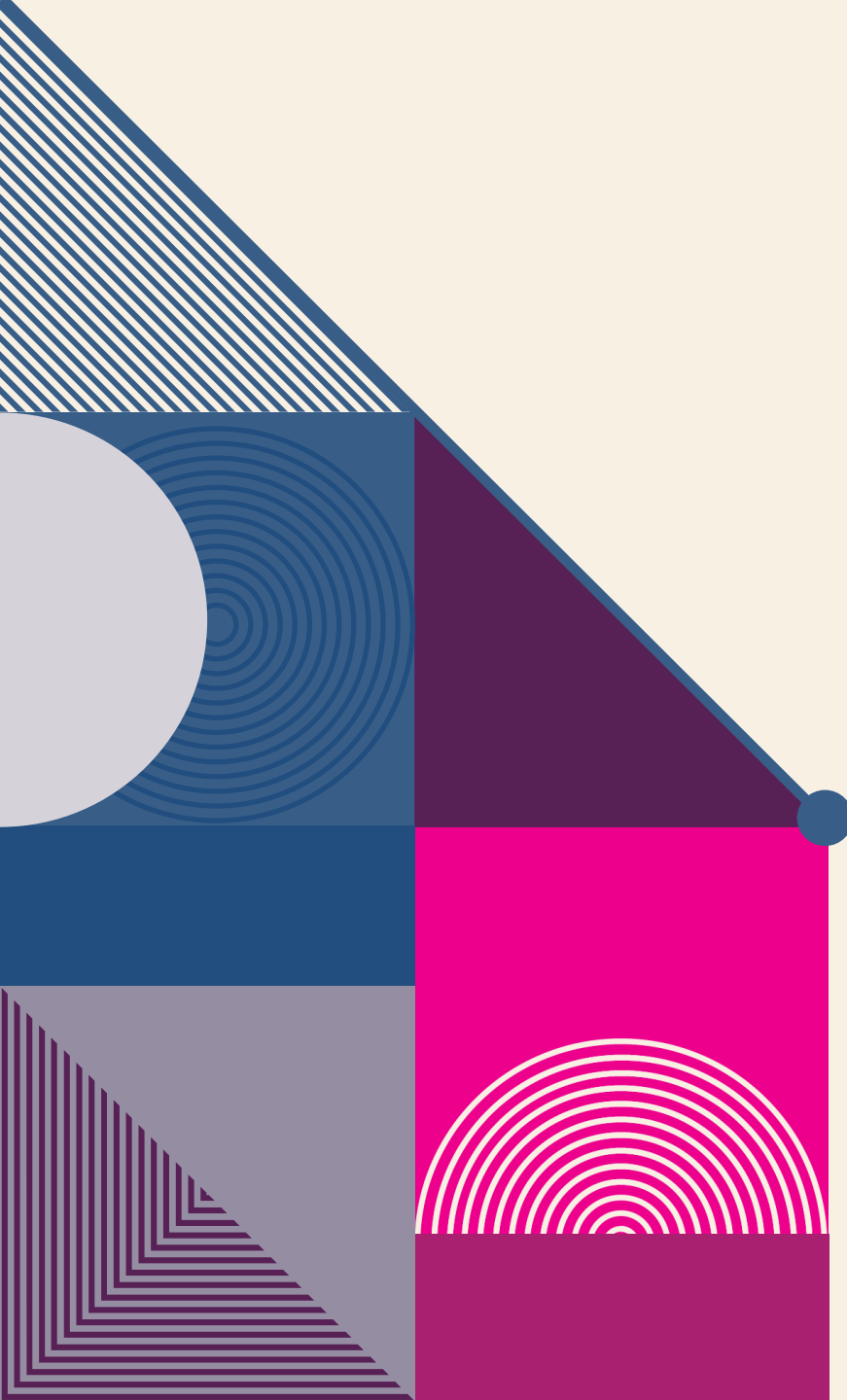


- In-depth NIH Public Access policy (Galter Library):
<https://libguides.galter.northwestern.edu/NIH-public-access>
- Federal funder public access policies (Galter Library):
<https://libguides.galter.northwestern.edu/other-funders/public-access>
- Open Access publishing (NUL):
<https://www.library.northwestern.edu/use-the-libraries/research-teaching/open-access-publishing/>
- Data management resources (NUIT):
<https://www.it.northwestern.edu/departments/it-services-support/research/data-storage/northwestern-university-research-data-management-resources.html>



SPONSORED RESEARCH AGREEMENTS

CLAIRE SCHNEIDER
KENDALL SIMMS



AGENDA

What is an SRA?

Indemnification

Intellectual Property

Industry versus Non-Profit



SPONSORED RESEARCH AGREEMENTS



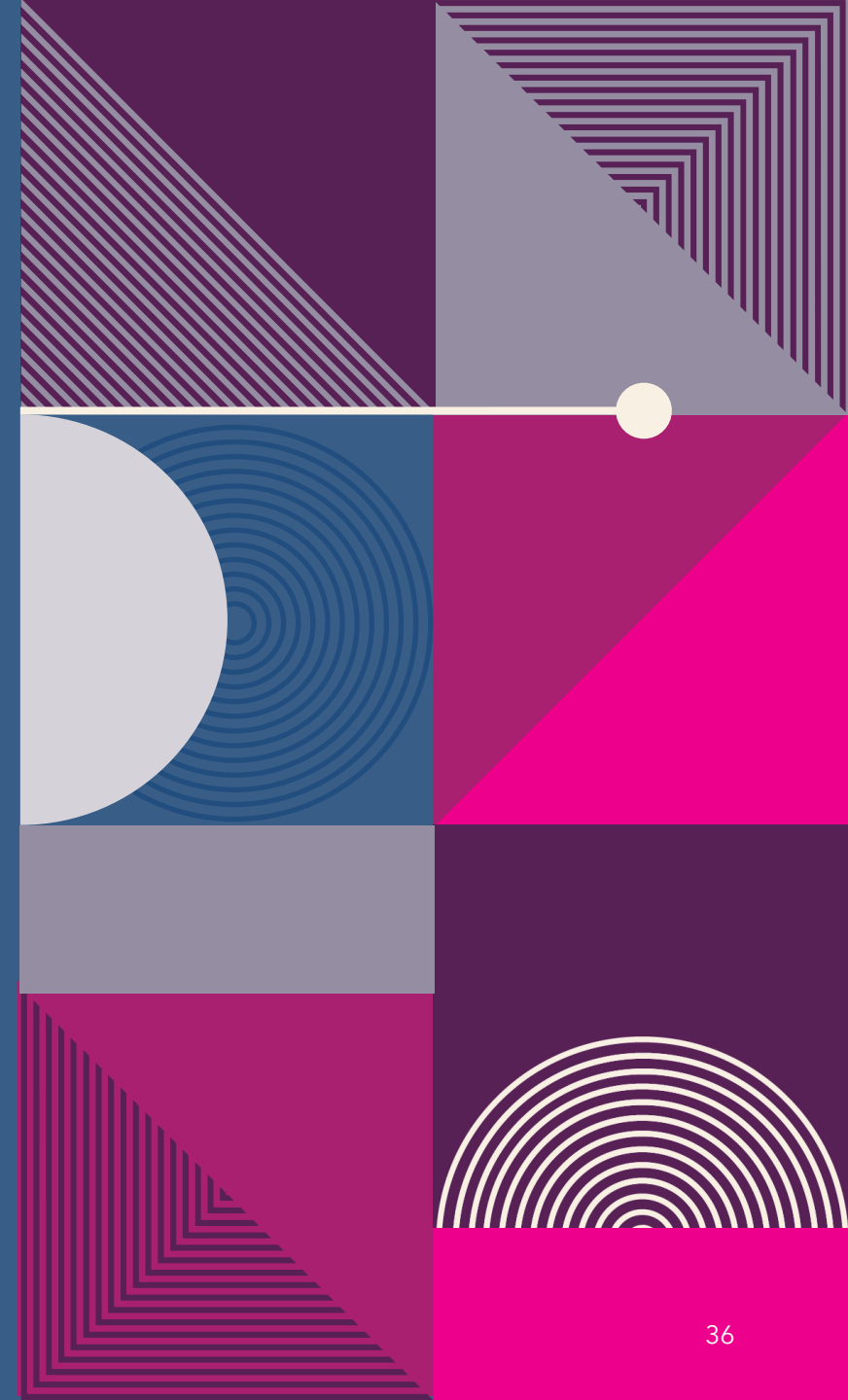
WHAT IS AN SRA?

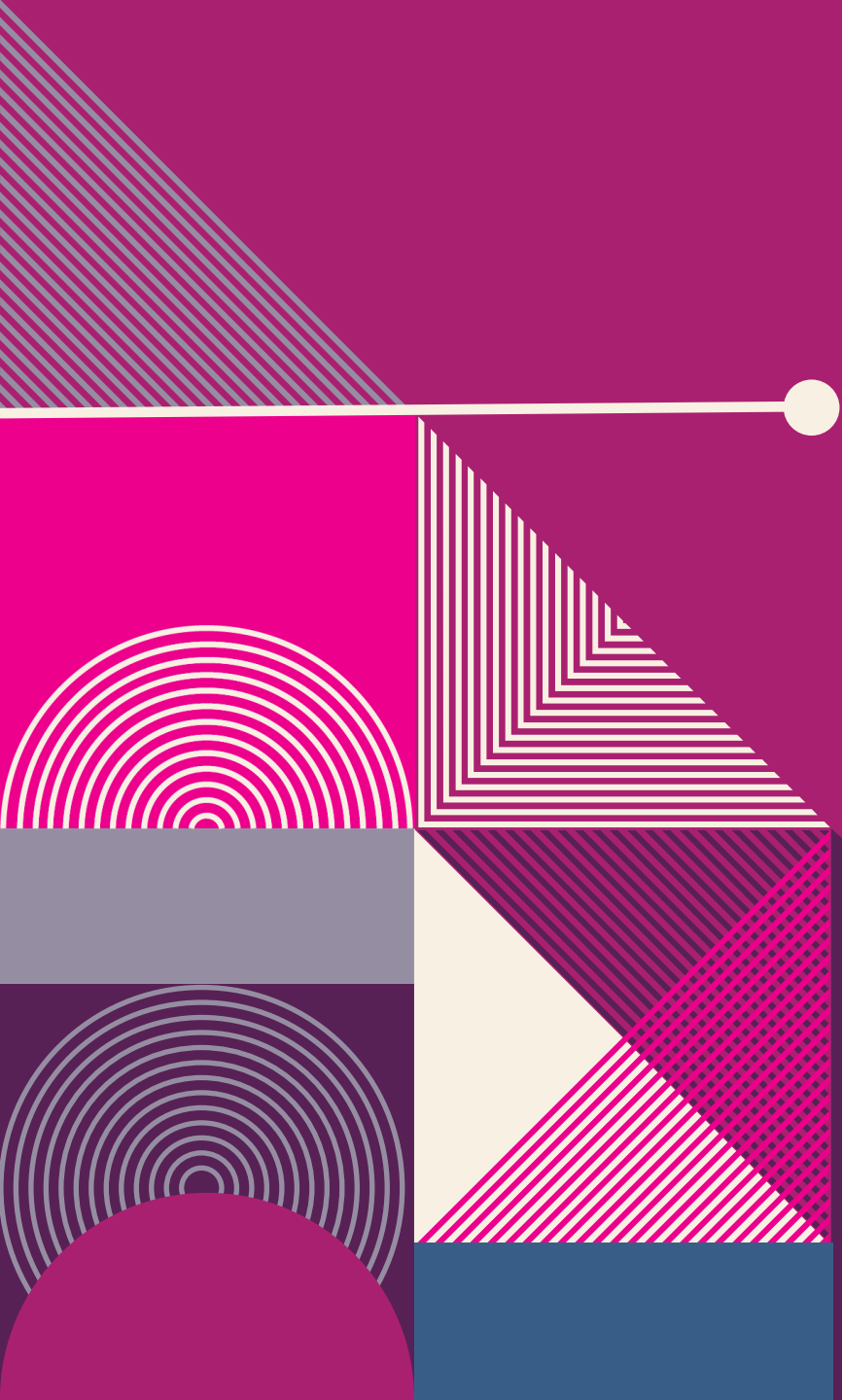
A legal contract between a funding entity (the sponsor) and a research institution (like NU). The sponsor provides funding to support a specific research project, while the researchers agree to conduct the research.

INDEMNIFICATION

A legal concept here one party promises to financially compensate or protect another party for specific losses, damages, or legal liabilities.

It essentially shifts the financial burden of certain risks from the injured party to the party responsible for causing the harm





INDEMNIFICATION IN SRAS

NU prefers to indemnify for only our gross negligence or willful misconduct.

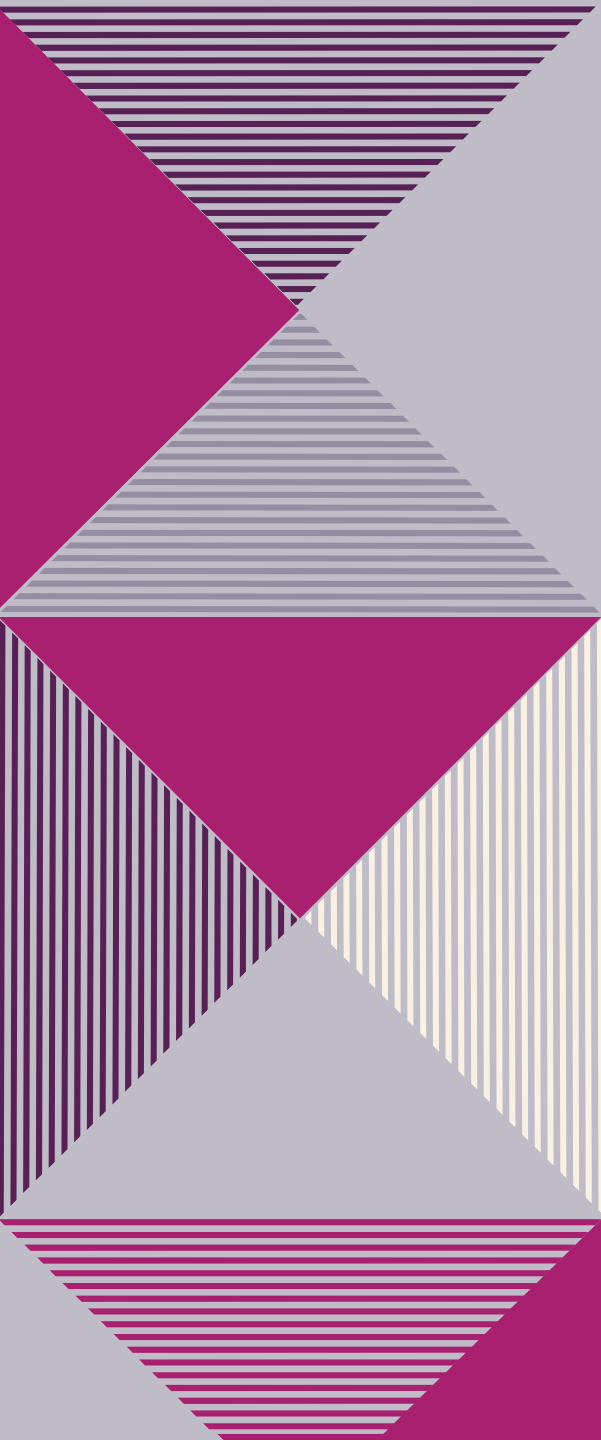
COMMON PAIN POINTS IN INDEMNIFICATION

Industry partners

- Sponsors want NU to indemnify for a lot, including IP
 - Requires extensive approvals
- Sponsors not understanding the nature of the research relationship
 - CAA having calls with sponsors is a great time to help explain NU's positions and where they came from (IE FRE)

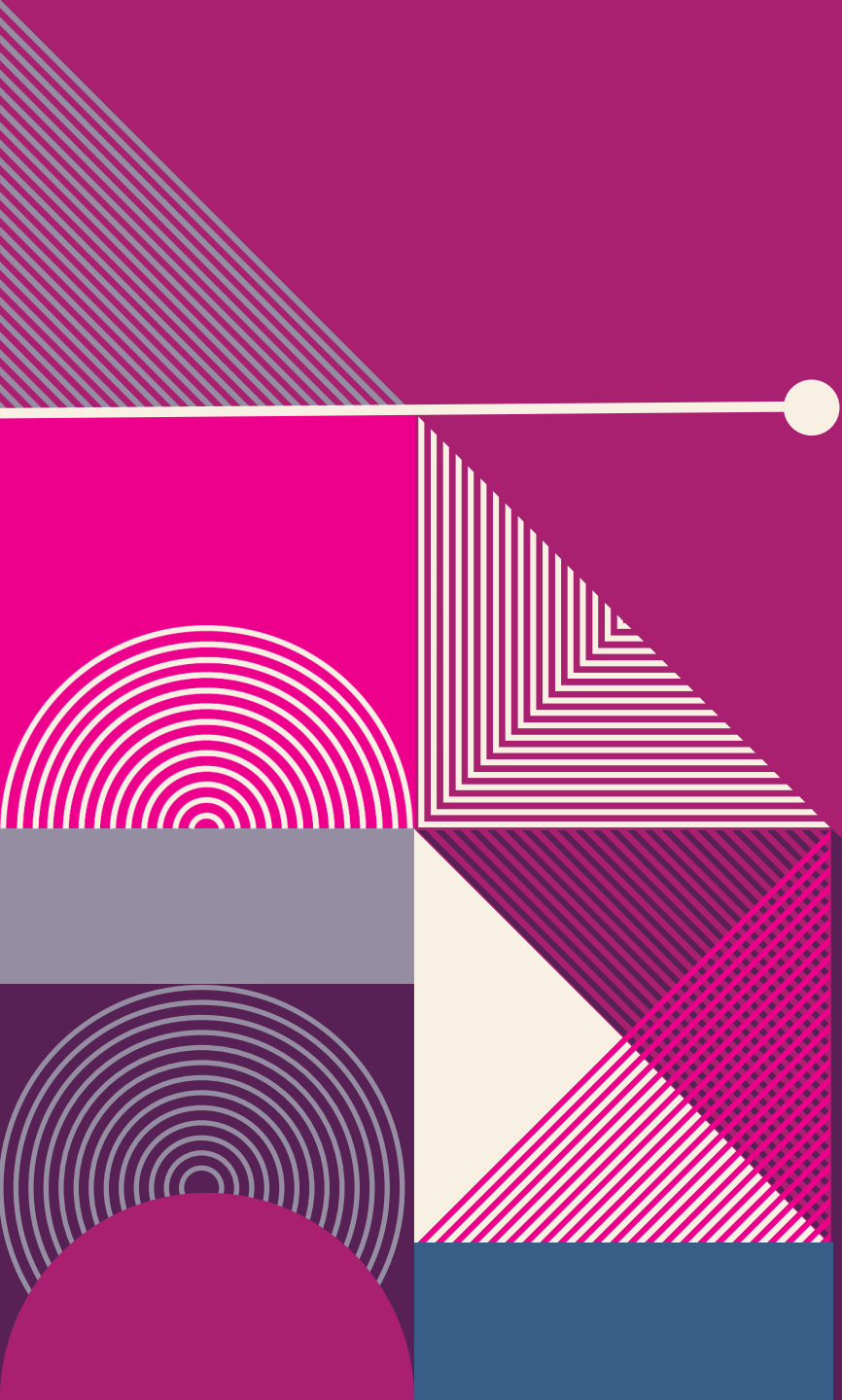
Non-profit or federal

- Some states have laws where school cannot indemnify based on state constitution
 - NU can typically accept this
- Federal agencies not budging on indemnification beyond what NU can offer
 - Escalations to stakeholders and SR Senior Leadership



INTELLECTUAL PROPERTY

- What is it?
 - Creations of the mind—such as inventions, artistic works, designs, symbols, and names used in commerce
- Can include patent, copyright, license, trademarks, and trade secrets



PATENTS, COPYRIGHT, AND TRADEMARK

Patents are government-issued property right to invention

NU copyright-NU PI owns all

Trademark: not seen often in SRAs



TRADE SECRETS

Trade secrets are highly confidential information known by few that have specific legal protections

NU cannot accept trade secrets

- Violate FRE

- Require VPR approval

Sponsors often believe confidential information is a trade secret, which is untrue because of the legal requirement for a trade secret

- EG Coca Cola

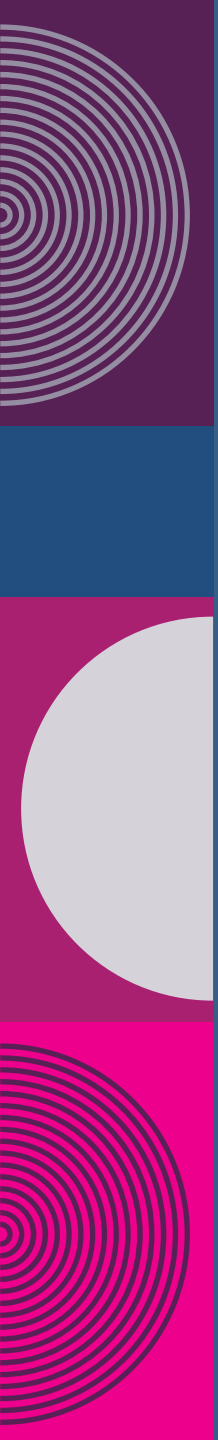


IP IN NU SRAS

- Northwestern prefers to follow the US laws of inventorship
 - Yours, mine, and ours
- Deviations require escalation to INVO

POTENTIAL IP ISSUES

Issue	Why is that an issue?
Commercial license to sponsor	Sponsor would make money off IP/Invention, not NU
Sponsor owning IP	Not following US laws of inventorship, loss of patent potential for NU
Sublicensable NERF	NU cannot control who sponsor license IP to
Owning everything jointly	Potentially unfair to PI, should be based on individual input



IP IN INDUSTRY VERSUS NON-PROFIT

Industry

- Industry wants to own everything
- Like indemnification, this is when CAA can have a call to explain the position of a school to move things along
- Refine delivery style
- Important to have a solid SOW in CERES since it will be needed to escalate non-standard provisions to INVO

1. Really not an issue in agreements with non-profit entities
 - a. Caveat is government work, agreements where someone is subbing work to NU and NU must follow the prime agreements IP

An abstract geometric design on the left side of the slide. It features a dark blue background with various geometric shapes and patterns. A white circle is positioned near the top left. Below it, a light blue semi-circle is visible. To the right of the semi-circle, there is a pink triangle with diagonal lines. Further down, there is a pink square with a pattern of concentric lines. At the bottom, there is a pink triangle with a pattern of concentric lines. The overall design is modern and minimalist.

QUESTIONS?

Thank you for joining us!

Please join us for future events:

August TBD Coffee Connect
Fall SR CLEAR