I. PURPOSE

Just-In-Time (JIT) is a term used by federal granting agencies or sponsors such as the National Institutes of Health (NIH), to refer to an application timeframe that defers submission of certain required documentation until after a proposal has been reviewed and is deemed likely to be funded. JIT allows for proposals to be submitted for review with limited administrative information. The NIH will request additional administrative information (for example, Institutional Review Board (IRB) or Institutional Animal Care and Use Committee (IACUC) approvals or Other Support documentation) only for proposals under consideration for funding, based on peer review score or institute decision.

Note that many sponsors have a similar processes and request similar documentation, but it is not necessarily called Just-in-Time. For the purposes of this document, the term JIT will be used to refer to this process, regardless of sponsor name.

A JIT request does not constitute an offer of funding. A JIT request alone should not be used to justify the issuance of a Provisional Award Number (PAN).

II. INTRODUCTION

Upon receipt of a JIT request, JIT information should be submitted to the sponsor by the stated due date or as soon as possible, unless other guidance is provided by the Office of Sponsored Programs (OSP). To allow for processing and institutional review, the Principal Investigator (PI) and Pre Award Administrator should provide all necessary documentation, including the original sponsor request with submission requirements, to OSP as soon as possible, but no less than three business days prior to the sponsor deadline. Applicants should not submit any JIT information until it is requested by the sponsor. For NIH proposals, the existence of a JIT link on the NIH research administration interface website, eRA Commons, does not constitute a request.

It is important to note that obtaining IRB and/or IACUC approval may take more time than provided by sponsor for JIT submission. Other JIT components may be submitted at any time after JIT is requested by sponsor. The IRB and/or IACUC approvals should then be submitted when they are available.

III. PROCEDURE

1. Upon receipt of JIT request from OSP, PI and/or sponsor, the Pre Award Administrator initiates JIT process and documents all required steps on the JIT checklist. (See Associated Document 1. Just-In-Time Documentation Checklist)
2. The Pre Award Administrator works with the PI to obtain the required materials, based on sponsor guidelines, for review and submission as soon as possible but no less than three days prior to sponsor deadline. Required materials may include:

- Other Support documents for all investigators designated as Key Personnel (See Other Support Note below)
- Human Subjects and/or Animal approval (See IRB / IACUC note below)
- Human Subjects Education Certification
- Subcontractor’s Other Support documents and IRB/IACUC approvals – authorized by the subcontractor’s institutional business official
- Other documentation, as requested by sponsor, based on specific award considerations

3. Pre Award Administrator gathers other requested documentation, such as revised budgets, equipment quotes or salary certification.

4. During this JIT process, any other documentation as required by the school/unit (refer to local school/unit guidelines), needs to be forwarded to the school/unit for approval prior to submission to OSP (e.g., detailed budget).

5. The Pre Award Administrator reviews the information prior to submitting to PI and OSP for their review and submission to sponsor.

   a. Pre Award Administrator will use the relevant COMPASS query to create the required updated Other Support pages.
   b. Pre Award Administrator reviews Other Support documents for accuracy and to confirm that effort does not exceed 12 calendar months for each Key Personnel and that the project scope of work overlap (if any) is described appropriately.
   c. Pre Award Administrator logs onto the IRB or IACUC systems to ensure that IRB or IACUC protocols specific to the grant have been linked to the record. Pre Award Administrator obtains the final documents via the IRB or IACUC and confirms the specific protocols with the PI. If protocol approval is not available in IRB or IACUC system, Pre Award Administrator requests update from PI on approval status. (See IRB/IACUC note below)

6. Pre Award Administrator submits final JIT packet with all sponsor-required documents to PI for approval. Once approved by PI, Pre Award Administrator submits final JIT packet with all sponsor-required documents to OSP. Submission to OSP can be completed through the JIT module in eRA Commons for NIH proposals, or per sponsor guidelines for other federal/non-federal sponsors (typically submit to OSP via email).

   a. If original manual signatures other than OSP are required for submission, the Pre Award Administrator will obtain these signatures in advance, prior to submitting to OSP
   b. Pre Award Administrator notifies OSP by email if there is a foreign collaborator/subcontractor included on the project

7. Pre Award Administrator saves JIT packet and any associated documentation (including PI approval) and correspondence on the RAS network drive.

8. Pre Award Administrator will monitor the progress of the JIT request, and note date of submission. JIT checklist remains active until confirmation from OSP is received that the JIT request, including any revisions or additions, has been submitted.
9. The Pre Award Administrator should notify the RAS Director or lead staff of any delays in the process and the causes of the delay. OSP reviews and submits final JIT to NIH through the JIT module in eRA commons, or to other federal/non-federal sponsors as per their guidelines (typically via email) and notifies PI and Pre Award Administrator by email that JIT has been submitted.

**IRB / IACUC NOTE:** In accordance with federal policy, each project must be approved by the IRB/IACUC protocol offices for research with human and/or animal subjects. If an existent protocol is to be used, it must be amended to include the new funding source and reviewed by the protocol office to ensure uniformity with the new scope of work. The PI should file for protocol amendments, or begin the process to write a new protocol, as soon as s/he knows the proposal has received a score in the fundable range.

- Obtaining IRB and/or IACUC approval may take more time than provided by sponsor for JIT submission. If the approvals are not available in this time period, all other JIT information should be submitted as above. The IRB and/or IACUC approvals should then be forwarded to OSP for submission once approved by the IRB or IACUC.

**OTHER SUPPORT NOTE:** The Pre Award Administrator will work with the PI and department, if applicable, to identify current and pending support and ensure that an investigator’s other support does not exceed 12 calendar months and does not overlap other research projects or duplicate other research funding. Additional review may be required if there are questions concerning project scope and investigator effort.

**Note:** Please refer to Associated Document 1. *JIT Documentation Checklist* at the end of this SOP to help in determining the Common JIT Elements that may be required by NIH, Federal and State Sponsors, and Foundations.

### IV. RESPONSIBILITY

<table>
<thead>
<tr>
<th>JIT Elements</th>
<th>PI or Designee</th>
<th>RAS</th>
<th>OSP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Support documents for PI and all Key Personnel</td>
<td>Provide input to RAS and Verify</td>
<td>Complete, with input from PI</td>
<td>Review/Verify</td>
</tr>
<tr>
<td>IACUC approval, <em>if applicable</em></td>
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<td>Track</td>
<td>Review/Verify</td>
</tr>
<tr>
<td>IRB approval, <em>if applicable</em></td>
<td>Complete</td>
<td>Track</td>
<td>Review/Verify</td>
</tr>
<tr>
<td>Human Subjects Education Certification, <em>if applicable</em></td>
<td>Complete</td>
<td>Track</td>
<td>Review/Verify</td>
</tr>
<tr>
<td>Subcontractor’s JIT information, <em>if applicable</em></td>
<td>Complete, with support from RAS</td>
<td>Track</td>
<td>Review/Verify</td>
</tr>
<tr>
<td>Additional information, as requested</td>
<td>Complete, with support from RAS</td>
<td>Track</td>
<td>Review/Verify</td>
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<tr>
<th>JIT Submission to Sponsor</th>
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<tbody>
<tr>
<td>Electronic via eRA Commons</td>
<td>Complete</td>
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<tr>
<td>Paper/PDF email</td>
<td>Complete</td>
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************************************************************************END OF SOP************************************************************************

**RAS CENTRAL NOTES:**
- Strip checklists/templates from SOP and keep them separate
JUST-IN-TIME DOCUMENTATION CHECKLIST

This checklist is a supporting document for SOP #1006, Just-In-Time and is intended for tracking purposes only. The steps outlined below are a list of the procedures. Please review the SOP prior to completing this checklist for further information and clarification on this process.

JIT refers specifically to the NIH request for additional information from the grantee institution prior to issuing the award. Department of Defense and other federal sponsors have a similar process. Foundations generally request institutional certification of current human and animal protocols.

All documents should be sent to the OSP for review and submission to sponsor. NIH JIT materials should be uploaded to the JIT module in eRA Commons.

<table>
<thead>
<tr>
<th>JIT Notification Checklist</th>
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<tbody>
<tr>
<td>Action</td>
</tr>
<tr>
<td>JIT Issued by Sponsor</td>
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<tr>
<td>JIT Received and From Whom</td>
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<tr>
<td>Due Date of JIT Request</td>
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<tr>
<td>JIT Submitted by RAS to OSP</td>
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<tr>
<td>OSP Submitted to Sponsor</td>
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</tbody>
</table>

Common JIT Elements that may be required by NIH, Federal and State Sponsors, and Foundations

- Other Support documents listing PI and Key Personnel project commitments, effort and goals
  Include the Scientific/Financial/Commitment Overlap Statement. (If none, please indicate.)

- Human and Animal protocol approval dates (also include approval letter)

- Human Subjects Education Certification for all personnel who will work with human subjects on the project.

- Revised budget, if requested – use the original sponsor budget format or the NIH PHS 398 budget form if requested by NIH

- Salary or payroll certifications for PI (generally only Defense grants and contracts.)
☐ Other documents as specified by the sponsor’s grant specialist or program officer and/or School/unit and department

☐ Subrecipient(s): include all the above documents, and the documents below as required by the sponsor:
  • International subrecipient: federal sponsor may request additional information necessary to obtain State Department clearance.
  • Subrecipient on federal contracts: Sole source justification, Cost/price analysis, Representations and Certifications, F&A rate letter - if not submitted with original proposal or as required by sponsor.

☐ Pre Award Administrator notifies OSP if there is a foreign collaborator/sub-awardee included on the project.

☐ Pre Award Administrator will log onto the IRB or IACUC systems to ensure that IRB or IACUC protocols specific to the grant have been linked to the record

☐ Pre Award Administrator reviews Other Support documents to confirm that effort does not exceed 12 calendar months for each Key Person and that the project scope of work overlap (if any) is described appropriately

☐ Pre Award Administrator gathers other requested documentation, such as equipment quotes or salary certification, and submits final submission to NIH through the JIT module in eRA Commons, or to other federal sponsors as per their guidelines (typically via email)

School/unit or Sponsor Specific Items that should be considered (Fill in as necessary according to School/unit or Sponsor procedure):

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