



Help Our Principal Investigators Stay Compliant

Escalations – When & Why

A Guide for Elements and Principal Investigator Teams



*How well is the Principal Investigator Team managing the research project?
Are the deliverables being submitted by their due dates, including Annual Performance Reports?*



Escalation of Non-Compliance

- The Data Management Integration Office (DMIO) will track and coordinate the following escalation steps, shown on the next page, when a PI is likely to be or is non-compliant with the data delivery terms of the Grant Award, Directed Task, or Project Plan.
- Archivist will notify the Funding Element or Project and DMIO after three attempts at communication with the PI that yields no response or a reply with no demonstrated work to meet a data delivery requirement.
- Each communication is given a 10-business day response period.
- The Archivist will notify the Element or Project Manager and DMIO when a PI does not meet a due date.
- The Element or Project Manager has the option to:
 1. Contact the PI and resolve compliance, preferably within 10 business days,
 2. Delay funding until the requirement is met, or
 3. Escalate to DMIO to facilitate the issue on their behalf with notification to the HRP Grant Technical Officer.

Past performance and data compliance will be considered when funding future awards.

- The HRP Grant Technical Officer will issue a formal letter to the PI and AOR with cc to DMIO, CSO, LSDA and Funding Element/Project outlining the importance of data archival to NASA’s overall mission, documenting non-compliance, and requesting the PI become current on all data deliveries within 30 days.
- A PI that does not respond or responds but does not settle outstanding data deliveries will be referred to the HRP Program Director and Chief Scientist for decision on delay of funding or termination of award.

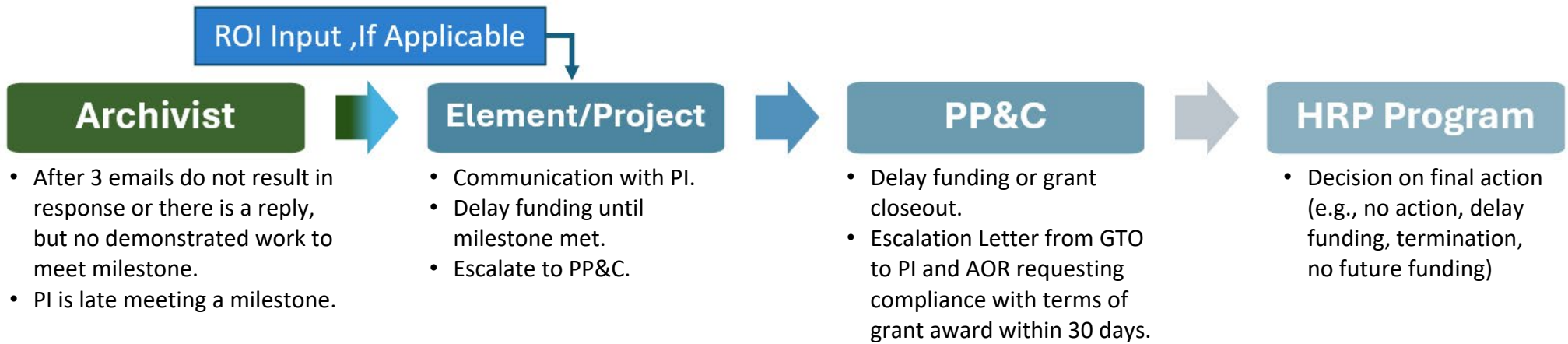


Compliance with Data Milestones

- Compliance is based on data milestones listed in the Post-Award Phase, Data Integration Schedule in the HRP DMP. These include some or all the following based on the Platform (Flight, Analog, or Terrestrial). [See Table 8-2 in the HRP DMP, pgs. 37-38.](#)
 1. **RDSA Created, signed, and delivered to the Archivist on time.** Why? - The Archivist and NLSP team need time to prepare for and reserve space in the data repository per RDSA instructions. *See the RDSA training sheet for more info.*
 - a. Signees include the PI, Element, AOR, and Archivist.
 2. **Data Submittal on time.** Why? – The Archivist needs time to perform their catalogue tasks by POP End.
 3. **Performance Reports submitted on time.** Why? - The financial and performance reporting measure the success of the project. These reports are required to release second and third year funding and to close out an award.

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Escalation Process Guideline



- ✓ Escalation guidelines are applicable to any milestone and adaptable to the unique aspects of a study and the point in time in the period of performance (research data submission agreement creation through grant closeout).
- ✓ Escalation should begin in a timely fashion. Avoid waiting to escalate a problem PI until late in the period of performance.
- ✓ Archivist may escalate to Element if a PI is not responsive, is in danger of not meeting a milestone, or is late meeting a milestone.
- ✓ Late = failure to meet milestone on specified due date.
- ✓ PI must be late for one or more milestones before funding can be delayed or Program Planning & Control sends an Escalation Letter.

Acronyms

AOR	Authorized Organizational Representatives
DMP	Data Management Plan
DMIO	Data Management Integration Office
FAIN	Federal Award Identification Number
GCAM	Grant and Cooperative Agreement Manual
GO	Grants Officer (NSSC)
HRP	Human Research Program
LSDA	Life Sciences Data Archive
NSSC	NASA Shared Services Center
POP	Period of Performance
PP&C	Program Planning & Control
RDSA	Research Data Submission Agreement
TO	Technical Officer (HRP Grants Office)



Important Reminder

The Element or Project Manager has the option to:

1. Contact the PI and resolve compliance, preferably within 10 business days.
2. Delay funding until the requirement is met, or
3. Escalate to DMIO to facilitate the issue on their behalf with notification to the HRP Grant Technical Officer.