Medical Research Future Fund Grant Variation Policy

MRFF grants are awarded following rigorous review of applications for funding and are managed by the Department of Health in partnership with grant hubs, including the Business Grants Hub (BGH) and the National Health and Medical Research Council (NHMRC).

MRFF grant funds may only be used to conduct agreed activities as specified in the grant agreement and must not be used for any other purposes without the prior written approval of the Program Delegate. The organisation administering the grant (administering organisation) must ensure that the grant activity is conducted in accordance with the grant agreement.

A grant variation is required when there are or will be changes to the grant agreement. This policy provides an overview of the types of variations that can be requested for an MRFF grant and the circumstances in which they may apply. Research Administration Officers (or equivalent; henceforth referred to as RAO) and Grantees should also review the grant opportunity guidelines under which a grant was awarded to determine eligibility and variation requirements.

MRFF grant funds must be used for the purpose outlined in the original approval. Variations can neither be used to request an increase of MRFF grant funds nor to request changes that do not align with the purpose of the grant outlined in the respective grant opportunity guidelines.

RAOs and Grantees should note that variation requests involving the movement of MRFF funds across financial years may not be possible without loss of some grant funding, depending on the availability of funds to accommodate the revised payment schedule in the relevant financial years.

Where the circumstances for a variation request do not match those listed in this policy, researchers must first consult with their RAO who may then contact the relevant grant hub for clarification. Researchers must not approach the grant hub or the Department of Health directly for advice on how to manage variations.

The decision to approve or reject a variation request is at the sole discretion of the Program Delegate. Note, once approved, information pertaining to the grant variation may be published online.

For further information regarding the process for submitting requests for variations, including required evidence, see **Hub Resources and Contacts** at the end of this document.

Types of Variations

1. Defer grant commencement date

This type of variation can be used to request a deferral to the commencement date of a grant, provided that the commencement date has not passed, and grant payments have not yet commenced.

Circumstances where this may apply include:

- where organisational approvals needed at the commencement date are not in place
- where the Chief Investigator A/Project Lead has an existing contractual obligation that cannot be met in time to meet the commencement date

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- family-related or personal circumstances
- where key personnel are taking up a temporary position in industry that will support building Australia's research capacity
- where there has been a delay in recruiting key personnel
- where there has been a delay in establishing arrangements with participating institutions and/or partner organisations.

Deferral period:

A grant commencement date can only be deferred up to 12 calendar months in total from the original commencement date. Variation requests exceeding 12 calendar months from the original commencement date will only be considered in exceptional circumstances.

2. Defer an in-progress grant

This type of variation can be used to request deferment of a grant that has passed the commencement date.

Circumstances where this may apply include:

- where organisational approvals needed during the grant period are not in place
- family-related or personal circumstances
- where key personnel are taking up a temporary position in industry that will support building Australia's research capacity
- external delays in the provision of research data or outcomes critical to progression of the grant.

Deferral period:

An in-progress grant can only be deferred up to 12 calendar months in total. Variation requests exceeding 12 calendar months will only be considered in exceptional circumstances.

3. Extend end date

This type of variation can be used to request an extension to the end date of a grant when it is anticipated that the grant will not be completed by the agreed end date.

Additional funds will not be provided, but funds that have not been spent may be spent during the extension period. There is no separate approval required to spend these funds. Funds must continue to be spent on eligible expenditure items only.

Extension period:

The end date of a grant can only be extended up to 12 calendar months in total. Variation requests exceeding 12 calendar months will only be considered in exceptional circumstances.

4. Relinquish grant

A request to relinquish a grant (or a novation to withdraw from a grant agreement, where appropriate) can be used when the agreed grant activities are not able to be completed.

Circumstances where this may apply include:

 where the Chief Investigator A/Project Lead requests a relinquishment and advises all other Chief Investigators of their request

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 where the administering organisation will no longer support the grant and the grant cannot be transferred.

Reporting milestones, including submission of a final report and financial acquittal, must be met within three months of relinquishment for a grant that has an executed grant agreement.

5. Transfer administering organisation

This type of request can be used to transfer a grant to a new administering organisation. Circumstances where this may apply include:

- where the Chief Investigator A/Project Lead requests the transfer and both the relinquishing organisation and the new administering organisation agree to the transfer
- where the relinquishing organisation will no longer support the grant.

The new administering organisation must be eligible to receive MRFF funds and may be required to demonstrate a capacity to support the grant for the remaining grant period.

Note that the RAO of the relinquishing organisation will need to obtain the required confirmation from the new administering organisation, and retain a copy for their records. The grant hub and/or the Department of Health may ask to view this evidence at any time.

RAOs should refer to the relevant resources (see **Hub Resources and Contacts**) for further details on the process of finalising the transfer of a grant between organisations once a request to transfer is approved (e.g., financial acquittal, transfer of unspent funds, execution of new grant agreement or deed of novation).

6. Change to grant activity

This type of variation can be used to request a change to an agreed grant activity as specified in the grant agreement. The proposed activity must align with the purpose of the grant outlined in the respective grant opportunity guidelines. A request for this type of variation will only be approved in exceptional circumstances, or where the change results from an organisational ethics committee approval process. Circumstances where this may apply include:

- changes to milestones, including substantial changes to milestone due dates
- changes to other agreed research activities
- changes to partner organisations and/or their contributions
- changes to reporting requirements.

Improvements to the techniques used to conduct research, e.g. new, cheaper or more accurate techniques or technologies, do not require a variation.

7. Change to personnel

This type of variation can be used to request a change to a member of the research team, including individuals named in the grant application in a Chief Investigator, Associate Investigator, Project Lead, Collaborator or Specified Personnel role. Individuals named in a grant application are expected to remain on the grant for the full grant period, and changes to personnel will only be considered under exceptional circumstances or where a change in the individual's employment prevents them from continuing in their role. This does not include circumstances where an individual has chosen to take long-service leave, sabbatical or leave without pay.

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8. Change in Full-Time Equivalent, Salary or Research Support Package

This type of variation can only be requested by Chief Investigators on MRFF grants awarded via NHMRC's People Support Schemes and Investigator Grants Scheme to request changes to their full-time equivalent (FTE), salary or Research Support Package.

Circumstances where this may apply include:

- family-related or personal circumstances
- where the Chief Investigator is taking up a temporary position in industry that will support building Australia's research capacity.

This type of variation cannot be used to request an increase of MRFF grant funds.

9. Change to expenditure, including overseas expenditure

This type of variation can be used to request a change to agreed expenditure items or payment dates as specified in the grant agreement. It may also be used to request a research component to be undertaken overseas if the equipment/resources required for that component are not available in Australia and the component is critical to the successful completion of the grant. Requests for this type of variation will only be considered under exceptional circumstances.

This type of variation cannot be used to request an increase of MRFF grant funds.

Submitting a Variation Request

Before submitting a variation request, the RAO must refer to the relevant resources for information on the submission process, including the information and required evidence that must be provided to inform the Program Delegate's decision (see **Hub Resources and Contacts**).

The information and required evidence will be dependent on the type of variation, and may include:

- a justification for the requested variation
- details of the impact of the requested variation on completion of the grant in accordance with its objectives, intended outcomes, and the MRFF Measures of Success
- details of the impact of the requested variation on grant activities and payments
- confirmation from all affected parties that they agree to the requested variation
- an updated risk management plan and/or budget
- evidence in support of claims made.

Variation requests must be certified and submitted by the administering organisation's RAO to the relevant grant hub at least one month before the proposed date of effect. Variation requests submitted from another organisation or an individual other than the RAO will not be accepted. Requests for variations with retrospective effect will only be approved in exceptional circumstances. Failure to notify the grant hub of changes to grants may result in a full or partial recovery of funds.

In certifying and submitting a variation request, the administering organisation's RAO is confirming that all affected parties agree to the variation. It is the responsibility of the administering organisation to ensure the required approvals for a variation are sought from all relevant organisations. RAOs must maintain a record of the reason for the proposed variation and any relevant supporting documentation. The grant hub and/or the Department

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of Health may at any point ask to view such evidence, including evidence that all affected parties have agreed to the change.

The Program Delegate will consider a request to vary a grant under this policy based on factors such as:

- how the proposed variation affects the project outcome
- consistency with the Program policy objective, grant opportunity guidelines and any relevant policies of Health
- changes to the timing of grant payments
- changes to the timing of grant completion
- risks and mitigation strategies in the updated risk management plan submitted with the request
- availability of funds.

The grant hub may seek additional information to inform the Program Delegate's decision. The grant hub will provide the resulting outcome of the request in writing.

Hub Resources and Contacts

Information regarding the process for submitting requests for variations can be obtained from the relevant grant hub as specified below. RAOs and Grantees should refer to the relevant resources in the first instance. Further information will only be communicated with the administering organisation's Research Office (or equivalent). Administering organisations and researchers should contact their RAO in the first instance.

Business Grants Hub

Email: MRFF@industry.gov.au

NHMRC

Web: https://www.nhmrc.gov.au/funding/manage-your-funding/vary-your-grant

Tutorials: https://www.nhmrc.gov.au/sapphire

Email: mrff.postaward@nhmrc.gov.au

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Glossary

Glossary terms	Description
Commencement date	For MRFF grants administered by BGH, this refers to the start date specified in the introduction to clause C of the grant agreement. For MRFF grants administered by NHMRC, this refers to commencement date for the Research Activity as specified in clause B of the grant schedule.
End date	For MRFF grants administered by BGH, this refers to the end date specified in the introduction to clause C of the grant agreement. For MRFF grants administered by NHMRC, this refers to the end date for the Research Activity as specified in clause B of the grant schedule.
Grantee	The legal entity other than the Commonwealth specified in the grant agreement and includes its officers, employees, contractors and agents. For MRFF grants administered by NHMRC, this term equates to the MRFF Eligible Organisation and their nominated contact officer for the purpose of grant applications and grant agreements (i.e. RAO).
Relinquish	For MRFF grants administered by BGH, this refers to a Grantee legally withdrawing from a grant agreement.
Research Administration Officer (RAO)	The officer nominated by the administering organisation as its contact person for the purpose of grant applications and grant agreements. For MRFF grants administered by BGH, this term equates to the administration officer(s) at the administering organisation identified as the Grantee.
Transfer	For MRFF grants administered by BGH, this refers to the novation of the grant agreement from the administering organisation/Grantee to another organisation.

For definitions of additional terms used in this policy, refer to the <u>MRFF Funding Agreement</u>, the <u>standard Commonwealth grant agreement</u> and the relevant grant opportunity guidelines.

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