

## Significant Changes to the GPS for FY 2023

*Changes made throughout the document for consistency or to update preferred terms (e.g., changing “the NIH” to “NIH”) that were not substantive or significant were not included in this chart.*

Section	Title	Comments
1.2	Definition of Terms	Added definitions for: Data Management; Data Management and Sharing Plan (DMS Plan); Data Sharing; Metadata; Scientific Data; Unique Entity Identifier (UEI).
1.2	Definition of Terms	Revised definition of Participant Support Costs to resolve conflict with language included in R25 FOAs
2.3.7.8	SAM Registration and Unique Entity Identifier Requirements	Updated section with UEI directions effective April 2022. Removed language related to DUNS number since it is no longer used and revised section title.
2.3.7.10	NIH Genomic Data Sharing	Updated section to reflect changes in GDS policy in the Data Management and Sharing Plan.
2.4.3	National Advisory Council or Board Review	Updated threshold for Special Council Review from \$1 million to \$2 million, based on <a href="#">NOT-OD-22-049</a>
4.1.2	Civil Rights Protections	Updated section to include language required for all HHS awarding agencies.
4.1.10	Financial Conflict of Interest	Updated section to incorporate <a href="#">NOT-OD-18-160</a> , which was never included in the GPS.
4.1.14	Human Fetal Tissue Research	Deleted language to align with 42 U.S.C. 489g-1.
4.2.9	Restriction on Purchase of Sterile Needles	Revised section to reflect current language in HHS appropriations acts.
8.1.2.6	Change in Status, Including Absence of PD/PI and Other Senior/Key Personnel Named in the FOA	Incorporated language from <a href="#">NOT-OD-22-129</a> (harassment, bullying, retaliation, or hostile working conditions).
8.1.2.7	Change of Recipient Organization	Incorporated language from <a href="#">NOT-OD-22-129</a> (harassment, bullying, retaliation, or hostile working conditions).
8.2.3.1	Policy for Data Management and Sharing (DMS Policy)	Updated to reflect policy in <a href="#">NOT-OD-21-013</a> (effective 01/25/23).
8.2.3.3	Genomic Data Sharing (GDS) Policy/Policy for Genome-Wide Association Studies (GWAS)	Updated section to reflect changes in GDS policy in the Data Management and Sharing Plan.
8.3	Management Systems and Procedures	Revised to incorporate requirements from <a href="#">45 CFR 75.303</a> and <a href="#">Standards for Internal Controls in Federal Government</a> .
8.4.1.2.3	Modified Financial Reporting Requirements	Updated to reflect change in FFR cash transaction reporting in <a href="#">NOT-OD-22-099</a> .
8.4.1.5	Financial Reports	Updated to remove language related to the change in FFR cash transaction reporting in <a href="#">NOT-OD-22-099</a> .

8.4.1.5.1	Cash Transaction Reports	Updated to remove language related to the change in FFR cash transaction reporting in <a href="#">NOT-OD-22-099</a> .
8.4.1.5.3	Revised Financial Reports and Expenditures	Updated to remove language related to the change in FFR cash transaction reporting in <a href="#">NOT-OD-22-099</a> .
8.4.1.8	NIH Disclosure Requirements	New section added to GPS.
8.6	Closeout	Updated to align NIHs closeout process to closeout awards to one year (vs. 270 days) after the period of performance in accordance with <a href="#">2 CFR Part 200.344</a> .
11.2.3.5	Responsible Conduct of Research	Updated section to align with Instructional Component Recommendations for the Responsible Conduct of Research (RCR) components as set forth in <a href="#">NOT-OD-22-055</a> .
11.3.3.5	Training in the Responsible Conduct of Research	Updated section to align with training elements for the Instructional Component Recommendations for the RCR components as set forth in <a href="#">NOT-OD-22-055</a> .
12.4.1.4	Training in the Responsible Conduct of Research	Training elements were revised to align with the Instructional Component Recommendations for the RCR components as set forth in <a href="#">NOT-OD-22-055</a> .
14.6.3	Plans to Promote Safe Environments at Conferences	New section added that provides steps to maintain a safe and respectful environment for all attendees by providing an environment free from discrimination and harassment, as expressed in <a href="#">NOT-OD-22-074</a> .
18.5.2.1	Place of Performance	Clarified language regarding the use of a foreign sites within the SBIR program and the need for recipients to provide compelling reasons why the work cannot be conducted in the U.S.
18.5.2.2	Change in Organization Status & Change of Recipient Institution Activities	Updated language to align with SBA policy that an SBIR grant cannot continue after merger if the company no longer meets the definition of a small business.
18.5.2.4	Multiple Program Director/Principal Investigator Applications and Awards	Clarified language around deviations.
18.5.5.2	Intellectual Property	Revised subsection, <i>Rights in Data Developed Under an SBIR/STTR Funding Agreement</i> , with the new information from the 2019 policy directive.
18.5.5.3	Data Sharing	Updated length of time NIH will not release data without recipient's permission to 20 years.
18.5.5.4	SBIR Life Cycle Certification	Added language to clarify reference is to a 40-hour work week per the <a href="#">SBIR Policy Directive</a> .