What is an Objective Review?

- An Objective Review is a process that involves the thorough and consistent examination of applications based on an unbiased evaluation of scientific or technical merits or other relevant aspects of the proposal.

Purpose of an Objective Review

- To provide a fair and credible forum for making sure that only the applicants who offer the greatest potential for furthering the program’s goals, objectives and purpose are selected for funding.
Outcomes and Other Purposes for the Review Process

- Provide an evaluation on the merits of an application submitted, based on the criteria/guidelines provided in the IHS Grants Funding Opportunity Announcement.

- Provide recommendations for possible funding of the grantee application to the IHS Program Staff.

- Provide technical assistance and feedback to potential IHS grantees on the strengths and weaknesses of their proposed project.

- The results of the objective review are of an advisory nature. The program office and approving official make the final determination for funding.
ORCs must be viewed as credible and fair.

Any circumstance that might introduce a conflict of interest, or the appearance thereof, or of prejudices, biases or predispositions into the process must be avoided.

ORCs are performed by experts in the field of endeavor for which support is requested.

Pre-award requirements are located at 45 C.F.R. part 75 subpart C.
As a supplement to any of the above review mechanisms, an individual(s) who possesses particular knowledge or expertise pertinent to an application or group of applications may be used as a consultant/reviewer to review and provide advice with respect to the application(s).

Use of such an individual is subject to applicable federal regulations and policies, including standards of conduct, conflict of interest statutes, and policies governing the use of consultants, whether the services are obtained through the personnel process or the acquisition process.
Nominations for reviewers may originate at any organizational level. The Grants Management Office may provide support and advice to the Program Office, but cannot make the final determination.

The appointing official may approve the use of individual consultants.

The official responsible for selecting reviewers, the appointing official, should be from the cognizant program office.
In addition, no two non–federal individuals reviewing a group of applications may be from the same organization or institution.

When selecting reviewers and determining whether to use federal or non–federal personnel, the appointing official must consider:

- whether a specific type of reviewer is mandated by statute or regulation;
- the type(s) of knowledge and expertise required;
- the availability of qualified reviewers to complete the entire review process;
- the peer reviewer may not have any direct relationship with the applicant organization;
- and may not have any conflict of interest in the award of a grant to that organization.
Who **Cannot** Become A Reviewer

Individuals with the following types of functions or having the specified interests **may not serve as an objective reviewer** for a particular application or group of applications:

- The award approving official;
- Any IHS employee responsible for encouraging the submission of the application(s);
- Any IHS employee who has provided substantive pre-application advice or technical assistance to an applicant;
- Any IHS employee who may later serve as a Project Officer (PO) for an award resulting from the FOA or application;
Who **Cannot** Become A Reviewer

- Any IHS employee of the servicing grants management office;

- Any IHS employee or other individual responsible for making post-award assessments of project performance or recipient compliance (including audits);

- Any IHS employee (including special government employees as defined in 18 U.S.C. 202(a) and 5 CFR 2635.102(l)) with a real or apparent conflict of interest in an application.

- Any IHS employee who might be substantially involved in the project under a resulting cooperative agreement;
Who **Cannot** Become A Reviewer

- If the employee’s financial interest is employment in a position with the potential applicant organization; or,

- Any consultant, whether in a direct relationship with the IHS or serving as a consultant to an organization under contract to the IHS, who has a conflict of interest with respect to an application. The conflict of interest may be actual or apparent, and may be based on an employment relationship, professional relationship, personal relationship, or business relationship with an applicant organization and/or the proposed PI/PD, or other project personnel.
Federal Employees As Reviewers

- The cognizant program office officials CANNOT serve as reviewers on proposals funded out of their respective offices.

A Federal employee may be from an office within the Indian Health Service considering the application for funding other than the cognizant program office.

Example:
OPHS – Apples and Oranges Health Review
* An OPHS staff person cannot serve as a reviewer*
In addition, no two non-federal individuals reviewing a group of applications may be from the same organization or institution.

Any IHS employee who reviews or evaluates an application in any capacity as part of his or her official duties and responsibilities;

The above exclusions apply to any individual currently performing the functions, who has performed those functions within the 12 months immediately preceding the review, or an individual serving as a line of authority over an individual with those functions.
The objective review must be performed as soon as possible after each application submission deadline (including those for single-source applications required to undergo objective review) or acceptance for review of an application based on an unsolicited request for funding.

The Division of Grants Management (DGM) is responsible for establishing all “Key Dates” for the award process, such as the Application Deadline Date, Objective Review Date, Earliest Anticipated State Date for applications etc.

Dates will be determined based on the overall workload of processing all awards for IHS for the current fiscal year.
Who Are The ORC Members

- **Chairperson**
  - Presides over the ORC meeting;
  - a non-voting member of the ORC;
  - prepares the Executive Summary Statements.

- **Program Official**
  - Serves as an advisor on programmatic related issues.

**NOTE:** POs are not allowed to provide any information that would create a bias in the minds of the Reviewers. No comments on personal knowledge of the applicants can be shared.
Who Are The ORC Members? (cont’d)

- Grants Management Specialist

  - Provides orientation to the ORC;
  - Collects signed score reports at the end of the ORC;
  - Ensures that the ORC is a fair and credible process and;
  - Serves as an advisor on grants management related issues.
The ORC panel consist of 3 members who are professionally and technically qualified to conduct the merit review:

**Primary Reviewer:**

- Introduces the application to the ORC;
- Reads key aspects of the project, including the highlights of the project narrative;
- Serves as the lead reviewer for the application;
- Conducts a thorough critique of all strengths and weakness of the application and;
- Presents them first to the ORC;
- Most knowledgeable of all aspects of the proposal.
Secondary Reviewer:

- Reviews the entire application and;
- Participates as a discussant based on their critiques;
- The open discussion should be geared around comments on any additional areas of the application that may not have been presented by the Primary Reviewer. Clearly the discussions must focus on strengths and weaknesses of the application.
Tertiary Reviewer:

- Offers a third opinion of the application and;
- Describes the key points of the proposal that were not mentioned by the primary and secondary reviewers.
Prior to ORC Meeting

- Reviewers should read the entire ORC package, noting responsibilities, expectations and timelines.

- Reviewers must sign the Conflict of Interest – Confidentiality form, indicate which, if any, applicants pose a conflict/potential conflict for them and submit the form to the Program Official.

- The ORC and panel(s) will be configured in ARM, and login details will be distributed to all users by the Grants System Administrator.
Contents of the Reviewer’s Package

- Reviewer Instructions for the Objective Review Process
- IHS Certification Form Regarding Conflict of Interest, Confidentiality and Non-Disclosure for Reviewers of Grant Applications
- Written Agreement of the Scope of Work
- Confidential Financial Disclosure Report (OGE-450) for Federal Reviewers
- IHS Program Announcement
- Reviewer’s Scoring Reference Sheet
- Reviewer’s Critique Template
- Objective Review Roster
- Panel Application Assignments
- Review Meeting Order of Review
- Helpful Application Review Tips for Reviewers
- Objective Review Timeline
- ORC Introduction Memo
- Panel Conference Call Discussion Process
- Panel Member Roles and Responsibilities
- Application Review Kick-Off & Training Conference Call agenda
Applications

- All reviewers will have access to each application via the Application Review Module (ARM). All reviewers are expected to enter scores and vote on each application in their panel. This includes the applications where the reviewer does not serve as the primary, secondary, or tertiary reviewer for the application.

- Training for the ARM Web site is at http://www.armtraining.net/Info.asp?PageID=41. Please review the Reviewer or Chairperson Flash Demos for Model 1.
Order of the ORC Meeting

- Program Official:
  - Calls the meeting to order.
  - Provides a brief description of the program that is up for review.
  - Expresses appreciation for those that will serve on the review panel.
  - Shares the number of applications that are up for review.
  - Introduces the Chairperson.
Order of the ORC Meeting cont’d

- **Chairperson**
  - Calls for a brief introduction of each Review Member.
  - Goes over the ORC protocol for conducting the meeting briefly, discusses breaks, timelines for reviewing applications and presides over the ORC process.
  - Keeps track of which reviewer had a Conflict of Interest, for which application.
  - Turns over the meeting to the GMS for the Orientation.
Grants Management Official’s Orientation:

- Describes the roles of each participant within the review process.
- Reminds ORC members to adhere to the program announcement criteria.
- Discusses scoring confidentiality.
- Discusses Critiques.
- Reminds reviewers to dispose of all applications after the ORC has concluded.
- Discusses the confidentiality of the review process after the ORC ends.
Chairperson

- Announces application to be reviewed.
- Persons with conflicts must excuse themselves from the room/call.
- Requests primary, secondary, and tertiary (as appropriate) reviewer to summarize the project narrative and present strengths and weaknesses of the application.
- Panel discussion for clarity, if needed.
- Call for a motion of approval or disapproval.
- Motion is seconded by a panel member.
- Votes are taken on the motion.
- Reminds reviewers to enter individual scores in ARM.
- Keeps track of which reviewer had a Conflict of Interest, for which application, and ensures that the reviewer with the Conflict of Interest is not included in any discussion to which they have conflicts.
** Panel members should express their range of scoring based on the scoring chart provided to them in the ORC Package.

Individual scores are confidential and should not be shared with the panel.

For example, the Primary Reviewer might say: After careful review of this application, I feel that it falls in the fundable range of 80 to 100.
Scoring Applications cont’d

** Reviewers must make sure that their numeric scores support the strengths and weakness outlined in their critiques.

Notes:
A high application score must be reflected by numerous strengths in the critique, and a low application score must be reflected by numerous weaknesses in the critique.
Reviewers cannot re-write the proposal. It must be scored as is based on the content of the application and the Funding Opportunity Announcement guidance.

Reviewers can only make recommendations for improvement in their critiques, but this will not change the score. This is designed to highlight the weaknesses of the application and assist the chairperson in addressing the weaknesses in the Executive Summary Statement.
Applications

- All applications that are reviewed must be scored.

Disapproved applications

- Disapproved applications “receive low scores that are outside of the fundable range” or unsatisfactory rating.
The Chairperson is responsible for making sure all reviewers completely score all assigned applications in ARM.

Once the ORC is completed, the Chairperson will be given a Word document with all critiques to create the Executive Summary Statements.
Information contained in the grantee application should be the **ONLY** basis for reviewers scores.

Reviewers cannot score applications based on speculation or assumption. Applications must be scored based on the:

- Funding Opportunity Announcement Guidelines
- Facts stated in the actual application
Critiques

The primary, secondary and tertiary reviewers must enter their critiques in ARM before the final ORC conference call. All other ORC members not serving as a primary, secondary or tertiary reviewer are not required to enter critiques but are required to score the applications based on their expertise and participation as a member of the ORC panel.

The Chairperson is responsible for ensuring that scores entered are reflected in the critiques the reviewers have written.

- Note: if a critique needs to be written or revised, the Chairperson must return the review to the Reviewer with instructions, and the Reviewer must resubmit the review within the time allotted.
Conclusion of the ORC

- Grant Systems Coordinator generates the Ranking and Approval List (RAL) and provides a copy to the Program for funding decisions.

- PO makes funding decisions and provides signed RAL to the Grants Management Officer (GMO), who signs and provides a copy to the GMS.

- The results of the objective review are of an advisory nature. The program office and approving official make the final determination for funding.

- GMS works with Finance and the PO to make awards in GrantSolutions.

- All applicants that have been disapproved or approved but unfunded must be notified by the Program Office within 30 days after the approving official has signed the Ranking and Approval List (RAL).

- Approved but unfunded applications will be held by DGM for one year after the RAL has been signed. Then destroyed.

- Reviewers are reminded that all discussions of the ORC are confidential and should not be shared outside of the ORC meeting.
Executive Summary

- The Grant Systems Coordinator will supply a Word document with all critiques to the Chairperson; who will create the Executive Summary Statements.

- Chairperson – Gives the Program Officer and DGM the final Executive Summary Statements with a signed cover letter.

- To avoid the appearance of a conflict, the program office will not be in possession of the Reviewers’ scores or critiques without first obtaining them from the Grants Management Staff.
Reviewer Payments

Program Official must contact :
Division of Acquisitions and Policy
301–443–5774

Regarding payment for reviewers. Either by :
P–Card or,
Cashier’s Check

** Note: the recommended threshold for IHS reviewers is $250.
For additional information regarding the IHS Objective Review process please contact your assigned GMS directly or you may call the DGM main line of (301) 443–5204.

If you find further assistance is needed please contact:

**Ms. Tammy Bagley**
Senior Grants Policy Analyst
Tammy.Bagley@ihs.gov
(301) 443–7172

**Mrs. Denise Clark**
Grants Mgmt Officer
Denise.Clark@ihs.gov
(301) 443–2215
The Division of Grants Management would like to take this opportunity to thank you for being a part of this Grants Management sponsored training. DGM is dedicated to Empowering our IHS grant community with the required knowledge and training needed for continued compliance of IHS policies, Indian laws, and HHS legislative and regulatory requirements.