



National Science Foundation GRANTS CONFERENCE

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Award Management



Hosted by the State University System of Florida at the University of South Florida

Panelist

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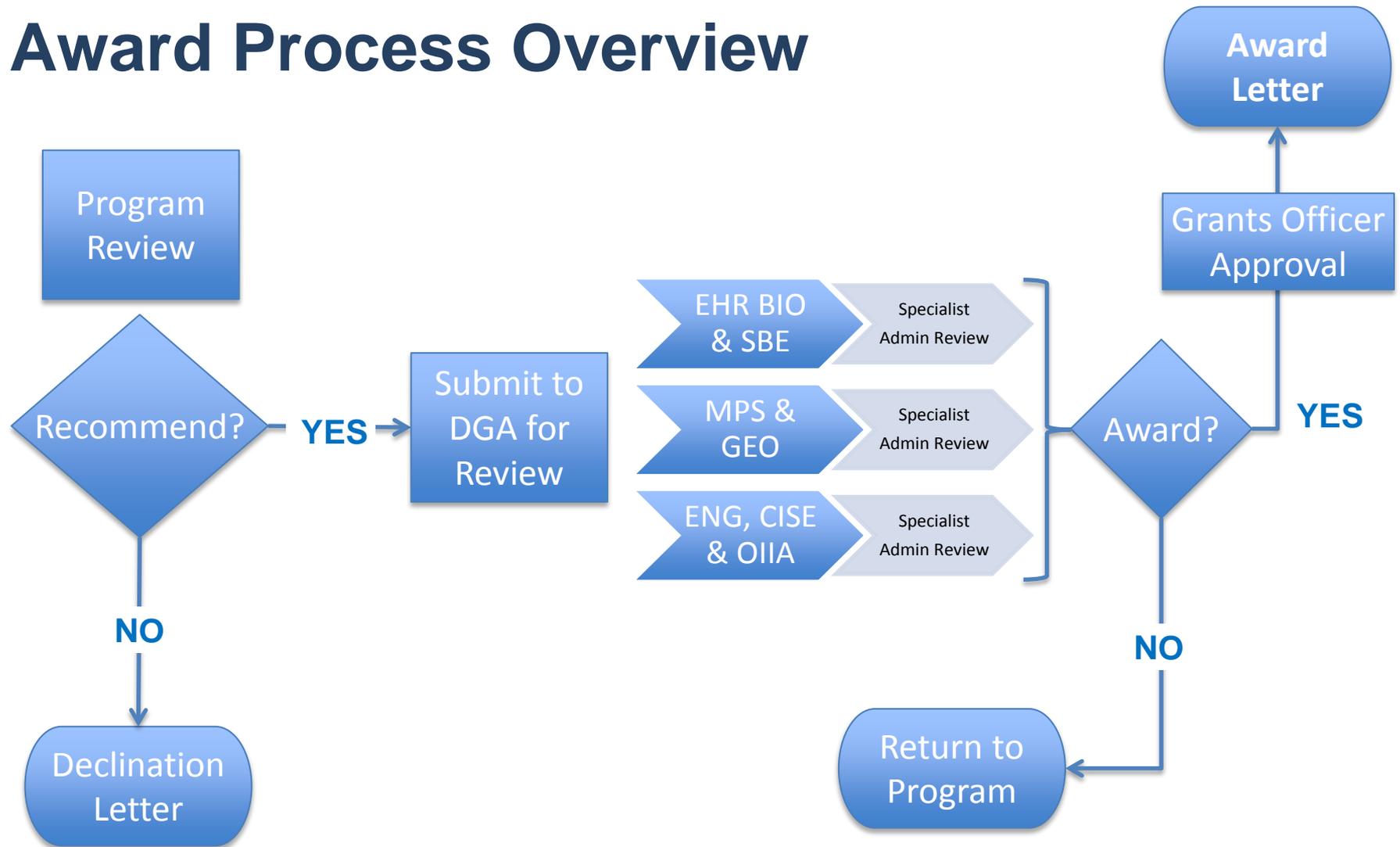


Topics Covered

- NSF Award Process
- Awardee Administration Roles
- Award Notification
- Award Revisions: Awardee approval vs. NSF approval
- Indirect Costs
- Participant Support
- Subawardees
- Cost Sharing
- Termination & Disciplinary Actions
- Accessing Documents on the NSF Website
- Conclusion



Award Process Overview



This Week in Numbers

Or at least
this past
Fiscal Year

17,100

Funded Award Actions
approved by DGA in FY14

11,300

New and Renewal Awards



4,500

Unfunded Actions

570

Award Transfers



What Kind of “Award”?

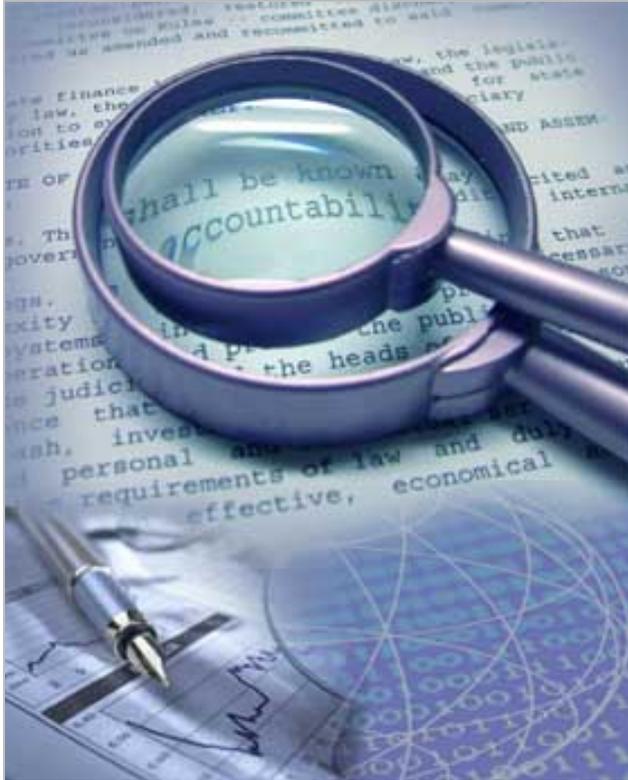
- **Grants**
 - Standard (all \$ up front)
 - Continuing Grants
- **Cooperative Agreements (CAs)** (substantial involvement)



- Public purpose of support or stimulation (grants & CAs)
- Not a direct benefit or use of the Federal government (contracts to procure goods & services)



Awardee “Administrative” Role



- Compliance with Federal rules
- Adherence to award terms
- Consistent with NSF policies
- Prudent management of funds
 - Allowable
 - Allocable
 - Reasonable
 - Necessary
- View OIG Semi-Annual Reports at:
www.nsf.gov/oig/pubs.jsp



Award Notification

- Grants obligate funds to carry out public purpose of support or stimulation
 - Award Letter to AOR (Office of Sponsored Research)
 - Award Notice entails - Grant General Conditions (GC-1), any special terms and conditions refer to Uniform Guidance references (2 CFR 200)
- Cooperative Agreements are also for public purpose; however, substantial involvement by the government is also anticipated
 - Award Notice to AOR (Office of Sponsored Research)
 - Financial & Administrative Terms and Conditions (FATC)
 - Programmatic Terms and Conditions (PTC)



Award Changes: Awardee Authorized Approvals

Approval from NSF is “NOT” required for:

- One-time 12 month extension of the expiration date
 - Except for awards that contain a zero balance
 - Cooperative Agreements
- Virtually all budget changes
 - Budget changes are the PI’s prerogative and are subject to organizational approval
 - Exception: when budget changes alter the objective or scope
 - Exception: when budget changes alter participant support costs
 - Exception: when the budget changes include the addition of a new subaward
- Approval of pre-award costs incurred within 90 days prior to the effective date
- Equipment will vest with awardee organization unless specified in the award letter



Prior Approval Requirements

Approval from NSF IS required for:

- Second No-Cost Extension
 - Approved by NSF Program Officer
- Third No-Cost Extension
 - Approved by Division of Grants & Agreements
- Awards that contain a zero balance
- Cooperative Agreements
- Unusual occurrences
- Short term absences (less than 90 days)



Prior Approval Requirements (Technically Related)



Approval from NSF IS required for:

- Change in Objective or Scope
- PI/Co-PI Changes
 - Withdrawal or change of PI/co-PI
 - Long-term absence: defined as 90 days or more
 - Reduction on PI level of effort: defined as a reduction of 25% or more in time devoted to the project



Prior Approval Requirements

Approval from NSF IS required for:

- Transferring and project effort:
 - Via sub-award
 - Transfer of the award to a new organization (“PI Transfers”)
- Reallocation of participant support
 - Additional categories of participant support costs other than those described in 2 CFR § 200.75 (such as incentives, gifts, souvenirs, t-shirts and/or memorabilia)
- Alterations and renovations over \$25,000 (Construction)
- Change in cost sharing amount identified on Line M of the cumulative award budget
- Pre-award costs more than 90 days prior
- Salaries of Administrative or Clerical Staff (2 CFR §200.413)
- Travel Costs for Dependents (2 CFR §200.474)



The Award & Administration Guide, Exhibit II-1 highlights certain budget changes that may require prior NSF approval



Award & Administration Guide (AAG)

Exhibit II-1: CONSOLIDATED LISTING OF PROGRAM- AND COST-RELATED GRANTEE NOTIFICATIONS TO, AND REQUESTS FOR APPROVAL FROM, THE NATIONAL SCIENCE FOUNDATION*

All notifications to, and requests for approval from, the National Science Foundation must be submitted electronically via use of NSF's electronic systems. Questions related to the electronic processing of these notifications and requests should be forwarded to the Help Desk by phone at: 1-800-673-6188 or by e-mail to: fastlane@nsf.gov.

Type of Grantee Notification	AAG Citation		
<ul style="list-style-type: none"> Grantee-Approved No-Cost Extension Significant Changes in Methods/Procedures Significant Changes/Delays or Events of Unusual Interest Annual and Final Cost Share Notification by Recipient Conflicts of Interest that cannot be satisfactorily managed, reduced or eliminated and research that proceeds without the imposition of conditions or restrictions when a conflict of interest exists 	I.D.3.c(i)		
	II.B.1.b		
	II.B.1.c		
	II.D.5		
	IV.A		
Type of Grantee Request**	GPG	AAG	Direct questions to:
<ul style="list-style-type: none"> Subawarding, Transferring or Contracting Out Part of an NSF Award First NSF-Approved No-Cost Extension Second NSF-Approved No-Cost Extension Change in Objective or Scope Long-Term Disengagement of the PI/PD or co-PI/co-PD Change in Person-Months Devoted to Project Withdrawal of PI/PD or co-PI/co-PD Substitute PI/PD or co-PI/co-PD PI/PD or co-PI/co-PD Transfer from One Organization to Another Pre-award Costs in Excess of 90 Days Salaries of Administrative or Clerical Staff Travel Costs for Dependents Rearrangements/Alterations in excess of \$25,000 (Construction) Reallocation of Funds Provided for Participant Support Costs 	II.C.2.g(vi)(e)	II.B.3	Grants Office
		I.D.3.c(ii)(a)	Program Office
		I.D.3.c(ii)(b)	Grants Office
		II.B.1.a	Program Office***
		II.B.2.c	Program Office***
		II.B.2.d	Grants Office, if necessary
		II.B.2.e	Program Office***
		II.B.2.f	Program Office***
		II.B.2.g	Grants Office
		V.A.2.b	Grants Office
	II.C.2.g(i)(b)		Program Office***
	II.C.2.g(iv)(a)		Grants Office
		V.C.1	Grants Office
	II.C.2.g(v)		Program Office
Type of Grantee Request**	GPG	AAG	Direct questions to:
<ul style="list-style-type: none"> Additional categories of participant support costs other than those described in 2 CFR § 200.75 (such as incentives, gifts, souvenirs, t-shirts and/or memorabilia) Change to cost sharing commitments reflected on Line M of the NSF award budget Request for Supplemental Support 	II.C.2.g(v)		Grants Office
		II.C	Grants Office
		I.E.4	Program Office***

Notes: *This listing of Notifications and Requests for Approval is not intended to be all-inclusive. **See also the relevant article in the applicable NSF grant terms and conditions. ***Final action by Grants and Agreements Officer, when warranted.

Resource: <http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/index.jsp>



Indirect Cost Rate

- Awardee organizations must use their full negotiated rate as negotiated by the grantee cognizant agency:
 - Department of Health and Human Services (DHHS)
 - Office of Naval Research (ONR)
 - National Science Foundation (NSF)
- 10% de minimis rate
 - Any non-Federal entity that has never received a negotiated indirect cost rate, may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely (CFR§200.414)
- *Please consult with your Office of Sponsored Programs for any questions*



Participant Support Cost

- Participants or Trainees (not employees – exception school districts – teacher training)
- Stipends, subsistence allowance, travel, registration fees, copies, tuition
- Participant Support Costs *are not* a normal account classification
- Awardee organizations must be able to identify participant support costs
 - Separate accounts, sub-accounts, sub-task, or sub-ledgers should be established to accumulate these costs
 - Should have written institutional policies & procedures
 - Typically excluded by NSF from application of the indirect cost rate, MTDC, and pass through funds such as stipends
- Participant Support – eligibility
 - What did participants have to do to receive the payment
 - Documentation of attendees at conferences or workshops
- Funds may not be re-budgeted to other expense categories without prior written approval of the NSF Program Officer (via FastLane)
- Reference: Grant General Conditions (GC-1, Article 7); Uniform Guidance (2 § CFR 200)



Subawards & Subrecipient Monitoring

The prime awardee is responsible for certain pre-award and post-award monitoring of their subrecipients:

- Ability to perform (technically, financially, and administratively)
- Adequate accounting system
- Not debarred from Federal grants or contracts
- Appropriate indirect cost rate and application base
- Performs Cost/Price Analysis
- Plan in place for monitoring subawards
- Review of invoices
- Technical reviews or site visit reports
- Flow-down provisions to subawardee
- Audit & access to subawardee records
- Cost principles (Uniform Guidance references (2 § CFR 200), FAR)
- Administrative requirements (Uniform Guidance references (2 § CFR 200))
- Statutory or regulatory requirements (COI, human subjects, drug-free workplace, CA-FATC Article 8)



Cost Sharing

- As recommended by the National Science Board and implemented by NSF, inclusion of voluntary committed cost sharing is prohibited in solicited & unsolicited proposals, unless approved in accordance with agency policy
- Eight programs have approved cost sharing requirements
 - Major Research Instrumentation Program (MRI)
 - Robert Noyce Scholarship Program
 - Engineering Research Centers (ERC)
 - Industry/University Cooperative Research Centers (I/UCRC)
 - Innovation Corps (I-Corps)
 - Experimental Programs to Stimulate Competitive Research (EPSCoR)
 - Small Business Innovation Research (SBIR) Program (where applicable)
 - Small Business Technology Transfer (STTR) Program (where applicable)



Cost Sharing (cont'd)

- Facilities, Equipment & Other Resources
 - New format will assist proposers in complying with NSF Cost Sharing policy and is a required component of the proposal
 - Provides an aggregated description of the internal and external resources (both physical and personnel) that the organization and its collaborators will provide to the project
 - No reference to cost, date of acquisition, and whether the resources are currently available or would be provided upon receipt of award
 - If there are no resources to describe, a statement to that effect should be included in this section of the proposal and uploaded into FastLane



Consequences of Overdue Research Performance Progress Report (RPPR)

- No future funding
- No PI changes or no-cost extensions
- No changes after final report approval by PO
- PO can return final report up to 30 days after approval date
- Report status can't be re-set for annual reports



Award Suspension & Termination

The award may be suspended or terminated in whole or in part in any of the following situations:

- By NSF when:
 - The awardee has materially failed to comply with the terms and conditions of the grant
 - NSF has other reasonable cause
 - NSF is ordered by the Deputy Director under NSF's Regulation on Research Misconduct (45 CFR & 689)
 - NSF and the awardee mutually agree that termination would be in both parties' best interest
 - NSF and the awardee cannot reach an agreement. NSF reserves the right to unilaterally terminate the grant
- By the awardee via a written notice to NSF, which includes the final balance



Potential NSF Oversight

- Programmatic Site Visits
- Division of Institution & Award Support (DIAS) contracted desk reviews
- DIAS Advanced Monitoring Site Visit Program in conjunction with the Division of Grants Agreements (DGA)
- Division of Financial Management (DFM) baseline monitoring including active payment monitoring and post award financial activity reviews
- Office of Inspector General (OIG) audits



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USF
UNIVERSITY OF
SOUTH FLORIDA

Advanced Monitoring Site Visit

Risk Factors:

- Award Amount
- New Grantee Status
- High \$ Amount to Subawards
- Government Owned Equipment
- Participant Support



Keys to Success

Read your award letter carefully!

It may include project or award-specific requirements, such as:

- Funding restrictions
- Special reporting requirements
- Other special conditions



Online Resources

Find how to get assistance with your award from the Division of Grants & Agreements

Direct Links to GPG and AAG

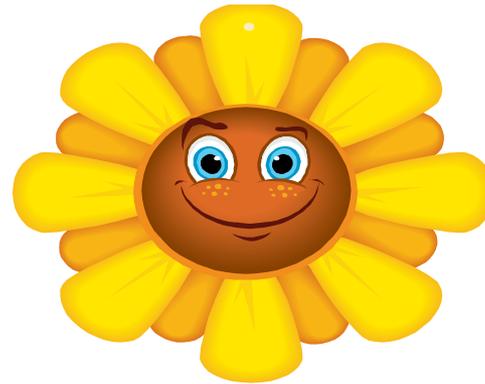
Find Award Conditions

The screenshot shows the NSF website's 'Awards' page. The top navigation bar includes 'HOME', 'FUNDING', 'AWARDS', 'DISCOVERIES', 'NEWS', 'PUBLICATIONS', 'STATISTICS', 'ABOUT NSF', and 'FASTLANE'. The 'Awards' section is highlighted, with a sub-section titled 'How to Manage Your Award'. Below this, there is a search bar and a list of links: 'Search Awards', 'Recent Awards', 'Presidential and Honorary Awards', and 'About Awards'. The 'Proposals and Awards' section is also visible, with links to 'Proposal and Award Policies and Procedures Guide', 'Introduction', 'Proposal Preparation and Submission', 'Grant Proposal Guide', 'Grants.gov Application Guide', 'Award and Administration', 'Award and Administration Guide', 'Award Conditions', 'Other Types of Proposals', 'Merit Review', 'NSF Outreach', and 'Policy Office'. The 'How to Manage Your Award' section contains text about the 'Award and Administration Guide (AAG)' and provides a link to [nsf.gov/awards/managing/](https://www.nsf.gov/awards/managing/). The page also includes a 'QUICK LINKS' button and a search box.



NSF Friendly Reminder...

ASK EARLY!



ASK OFTEN!

To find contact information for NSF staff, please search [nsf.gov/staff](https://www.nsf.gov/staff) or reference NSF's organization chart at [nsf.gov/staff/orglist.jsp](https://www.nsf.gov/staff/orglist.jsp)

