



National Science Foundation  
WHERE DISCOVERIES BEGIN

# NSF Grants Conference

## Award Management and Civil Rights Compliance

**October 6-7, 2014**

Hosted by The George Washington University, Arlington, Virginia

# Panelists

## Lori Wiley

Senior Staff Associate; Office of Budget, Finance & Award Management; Division of Grants & Agreements (DGA)

## Terri Sisley

Complaints Adjudication & Compliance Manager;  
Office of the Director; Office of Diversity & Inclusion (ODI)

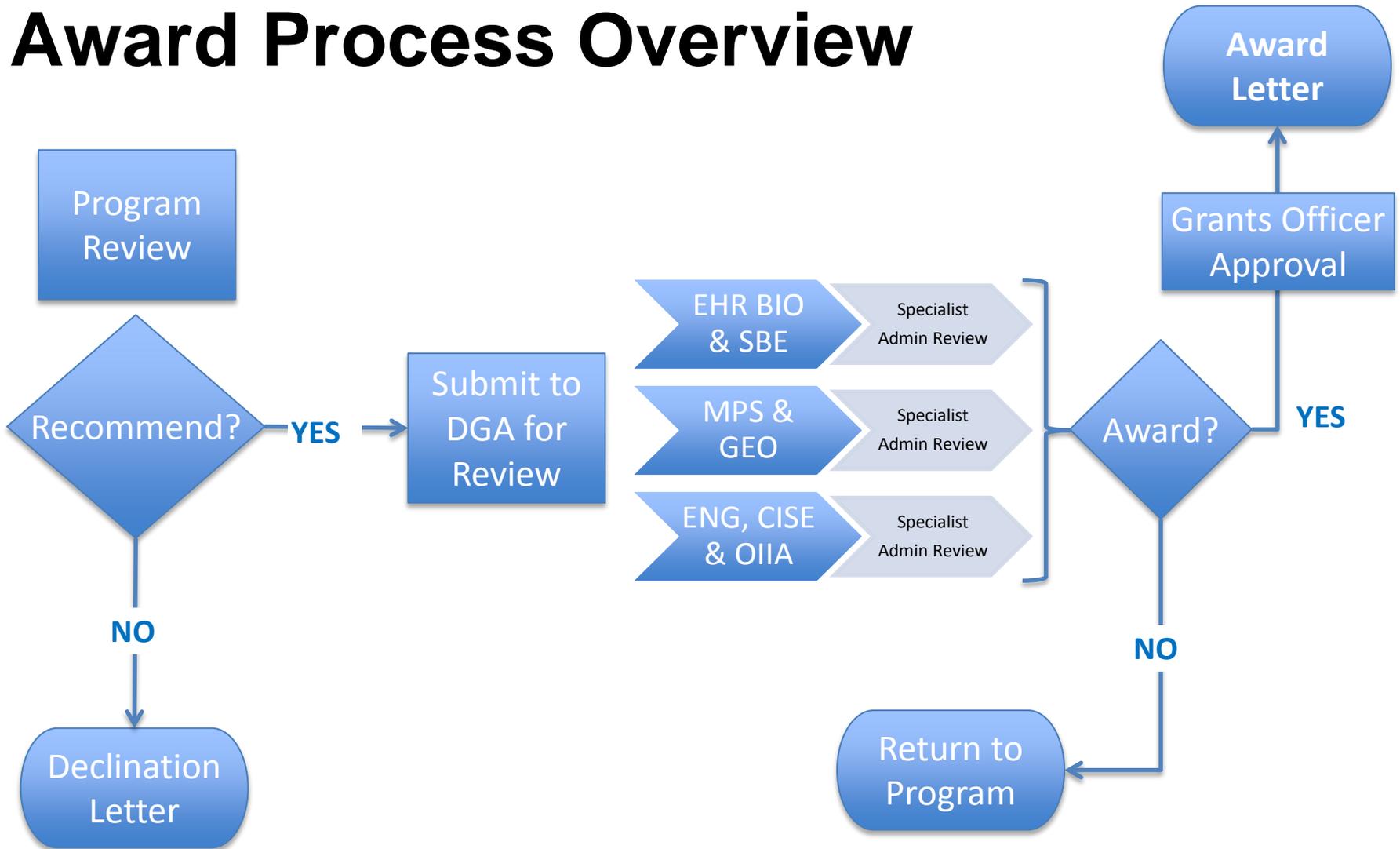


# Topics Covered

- Award Management
  - NSF Award Process
  - Awardee Responsibilities
  - Post Award Notifications and Requests
  - Reporting and Monitoring
  - Suspension and Termination
- Civil Rights Compliance



# Award Process Overview



# This Week in Numbers



**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”?

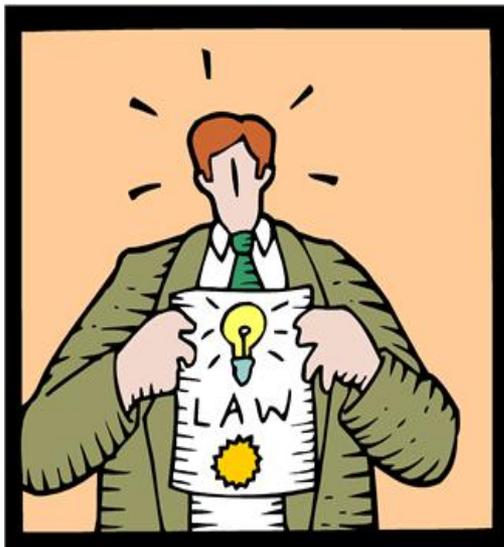
- ✓ **Grants**
  - Standard (all \$ up front)
  - Continuing Grants
- ✓ **Cooperative Agreements (CAs)**  
(substantial involvement)



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



# Awardee Responsibility



- ❖ Compliance with Federal rules
- ❖ Adherence to award terms
- ❖ Consistent with NSF policies and institutional policies
- ❖ Prudent management of funds
  - Allowable
  - Allocable
  - Reasonable



# Notification (to the institution) and Terms of Award

## Grants

- Award **Letter**
- Research Terms and Conditions (RTC) or Grant General Conditions (GC-1)



## Cooperative Agreements

- Award **Notice**
- Financial Administrative Terms and Conditions (FATC)
- Programmatic Terms and Conditions (PTC)



# Helpful to Know...

## Proposal Number → Award Number



Award Number also identifies  
NSF's managing program office  
(division acronym)

example: PLR-1234567



# Post Award Notifications & Requests

FastLane Research Administration | HOME

NSF Home | News | Site Map | GPG | AAG | Contact Us | FastLane Help  
Change Password | Logout

Notifications & Requests | MAIN

Forwarded by PI | Prepared by SPO | Submitted to NSF

Prepare a New Notification or Request for Award #: 9999999

**Award Amount:** \$7,000,000.00  
**Expiration Date:** 12/31/2011  
**Division:** DIVISION OF INFORMATION SYSTEMS  
**Award Title:** Test for Demo  
**Awardee Organization:** NSF  
**PI/PD:** Alphaman, Alan

GRANTEE NOTIFICATION TYPES	Topic Guidance
<input type="radio"/> Anticipated Residual Funds in excess of \$5,000 or 5%	<a href="#">AAG</a>
<input type="radio"/> Grantee Approved No Cost Extension	<a href="#">AAG</a>
<input type="radio"/> Cost Sharing Equal To or Greater Than \$500,000	<a href="#">AAG</a>
<input type="radio"/> Significant Changes/Delays or Events of Unusual Interest	<a href="#">AAG</a>
<input type="radio"/> Conflicts of Interests	<a href="#">AAG</a>
<input type="radio"/> Significant Changes in Methods/Procedures	<a href="#">AAG</a>
<input type="radio"/> Short-Term Absence of the PI/PD (Up to Three Months)	<a href="#">AAG</a>

GRANTEE NOTIFICATION TYPES	Topic Guidance	GRANTEE REQUEST TYPES (Requires NSF Approval)	Topic Guidance
<input type="radio"/> Anticipated Residual Funds in excess of \$5,000 or 5%	<a href="#">AAG</a>	<input type="radio"/> Addition of SubAward	<a href="#">AAG</a>
<input type="radio"/> Grantee Approved No Cost Extension	<a href="#">AAG</a>	<input type="radio"/> Withdrawal of PI/Co-PI	<a href="#">AAG</a>
<input type="radio"/> Cost Sharing Equal To or Greater Than \$500,000	<a href="#">AAG</a>	<input type="radio"/> Long-Term Absence of the PI/PD (Over Three Months)	<a href="#">AAG</a>
<input type="radio"/> Significant Changes/Delays or Events of Unusual Interest	<a href="#">AAG</a>	<input type="radio"/> NSF Approved No-Cost Extension	<a href="#">AAG</a>
<input type="radio"/> Conflicts of Interests	<a href="#">AAG</a>	<input type="radio"/> PI Transfer	<a href="#">AAG</a>
<input type="radio"/> Significant Changes in Methods/Procedures	<a href="#">AAG</a>	<input type="radio"/> Pre-award Costs in Excess of 90 Days	<a href="#">AAG</a>
<input type="radio"/> Short-Term Absence of the PI/PD (Up to Three Months)	<a href="#">AAG</a>	<input type="radio"/> Rearrangement/Alteration \$25,000 or over (Follow these links for more information on <a href="#">Non-FDP Organizations</a> or <a href="#">FDP Organizations</a> . They will open a PDF file in new window.)	<a href="#">AAG</a>
		<input type="radio"/> Change of PI	<a href="#">AAG</a>
		<input type="radio"/> Significant Change in Person-Months Devoted to Project	<a href="#">AAG</a>
		<input type="radio"/> Changes in Objective or Scope	<a href="#">AAG</a>
		<input type="radio"/> Reallocation of Funds Budgeted for Participant or Trainee Support Costs	<a href="#">AAG</a>

\*Topic Guidance is provided through the Award & Administration Guide (AAG) reference.

Prepare Cancel

**“Requests” require NSF approval**



# Changes that need approval?

- Objective or scope
- Principal Investigators (PIs)
- Subawards
- Participant Support
- Pre-award Costs > 90 days



See [Award Administration Guide](#) (AAG) – Exhibit II-1



# Grant Transfers?



## Awarded to the Institution and not the PI

- Nominate substitute PI
- Agree to transfer
- Request to subaward
- Terminate



Requires NSF Approval



# What about more time?

- **Grantee Approved No Cost Extensions**
  - Submit Notification at least 10 days prior to award end date
  - Cannot be used for awards with \$0 balance
- **NSF-approved extensions**
  - Request prior to award end date with justification
  - Not intended just to use up remaining \$



# Important to Know...

## Email is NOT sufficient for prior approvals



- All required notifications and requests must be **submitted through Research.gov / FastLane**
- Emails to the NSF PO or comments in project reports does not suffice to obtain prior approval
- Must also **follow institutional policies**



# Other Considerations...

See [Award Administration Guide](#) (AAG) – Chapter VIII

- **Protection of Living Organisms**
- **Intellectual Property**
- **Program Income**
- **Travel to Foreign Countries**

**Fly America Act**



# Has my request been approved?



Not always an Award Amendment...

Check



for expiration date.



# Required Technical Reporting

- ❖ Annual Project Reports
- ❖ Final Project Report
- ❖ Project Outcomes Report

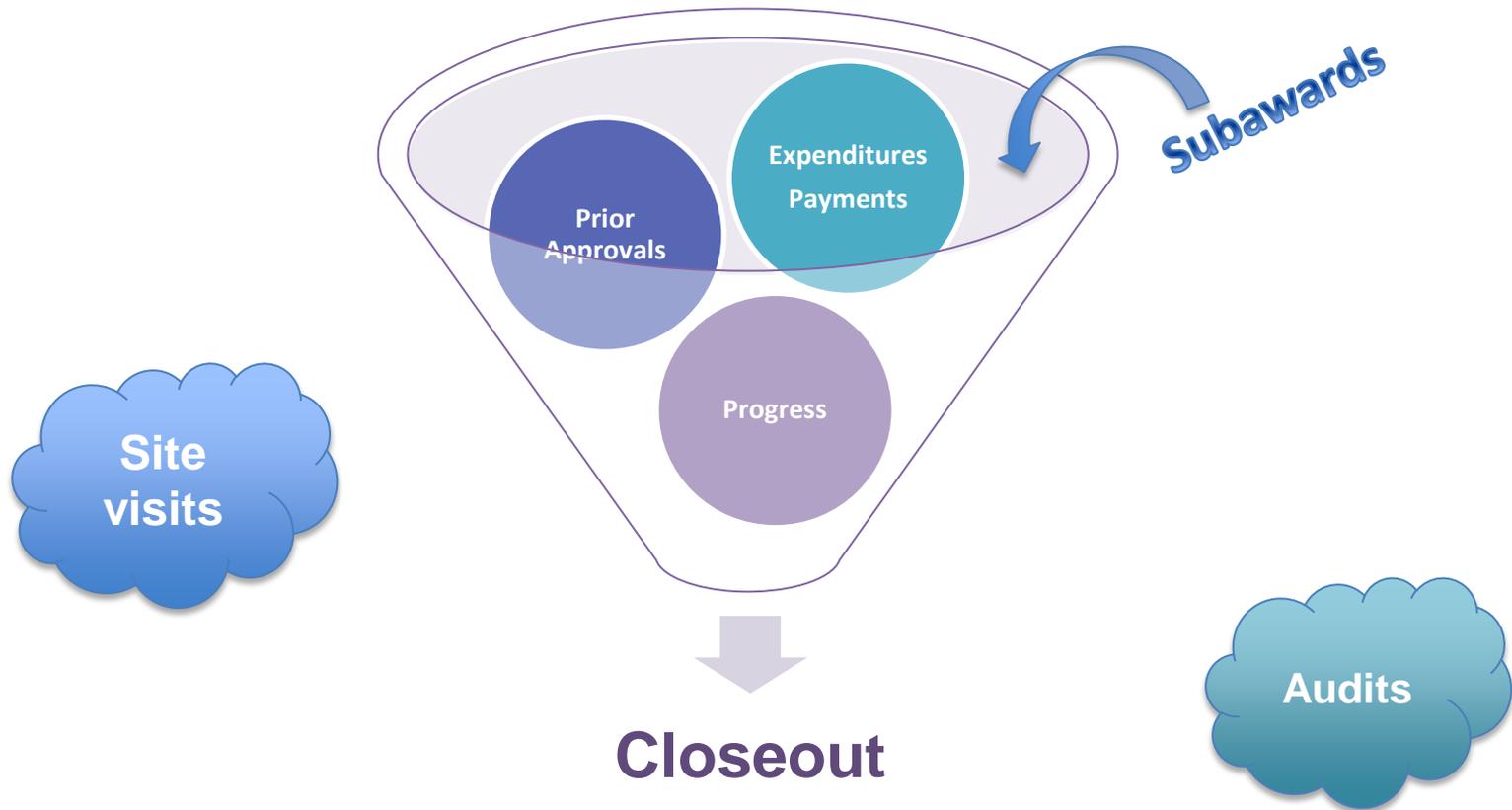


## An Overdue Report...

- ✓ Prevents any future funding
- ✓ Stops prior approvals
- ✓ Affects all PIs and co-PIs



# Continuous Award Monitoring



# What happens if things really go wrong?

NSF may suspend or terminate award



Awardee can terminate



# 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

**National Science Foundation**  
WHERE DISCOVERIES BEGIN

QUICK LINKS

SEARCH

HOME FUNDING AWARDS DISCOVERIES NEWS PUBLICATIONS STATISTICS ABOUT NSF FASTLANE

## Awards

Search Awards  
Recent Awards  
Presidential and Honorary Awards  
About Awards

### Proposals and Awards

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  
Policy Office

## How to Manage Your Award

### [nsf.gov/awards/managing/](https://www.nsf.gov/awards/managing/)

The [Grant General Conditions](#), [Research Terms and Conditions](#), [Cooperative Agreement Conditions](#) and [Special Conditions](#) pages provide the full text of the terms and conditions used to manage NSF grants and cooperative agreements. Topics covered include awardee responsibilities, Federal requirements, pre-award costs, no-cost extensions, significant project changes, travel, allowable costs, project reports, final report requirements, and more.

The [Policy Office](#), in the [Division of Institution and Award Support](#), provides general proposal & award policy guidance for use by the NSF proposer and awardee community. The Policy Office page includes NSF-specific regulations, policies and procedures, other Federal regulations, information regarding important NSF policies, answers to frequently asked questions, award conditions, as well as other valuable information.

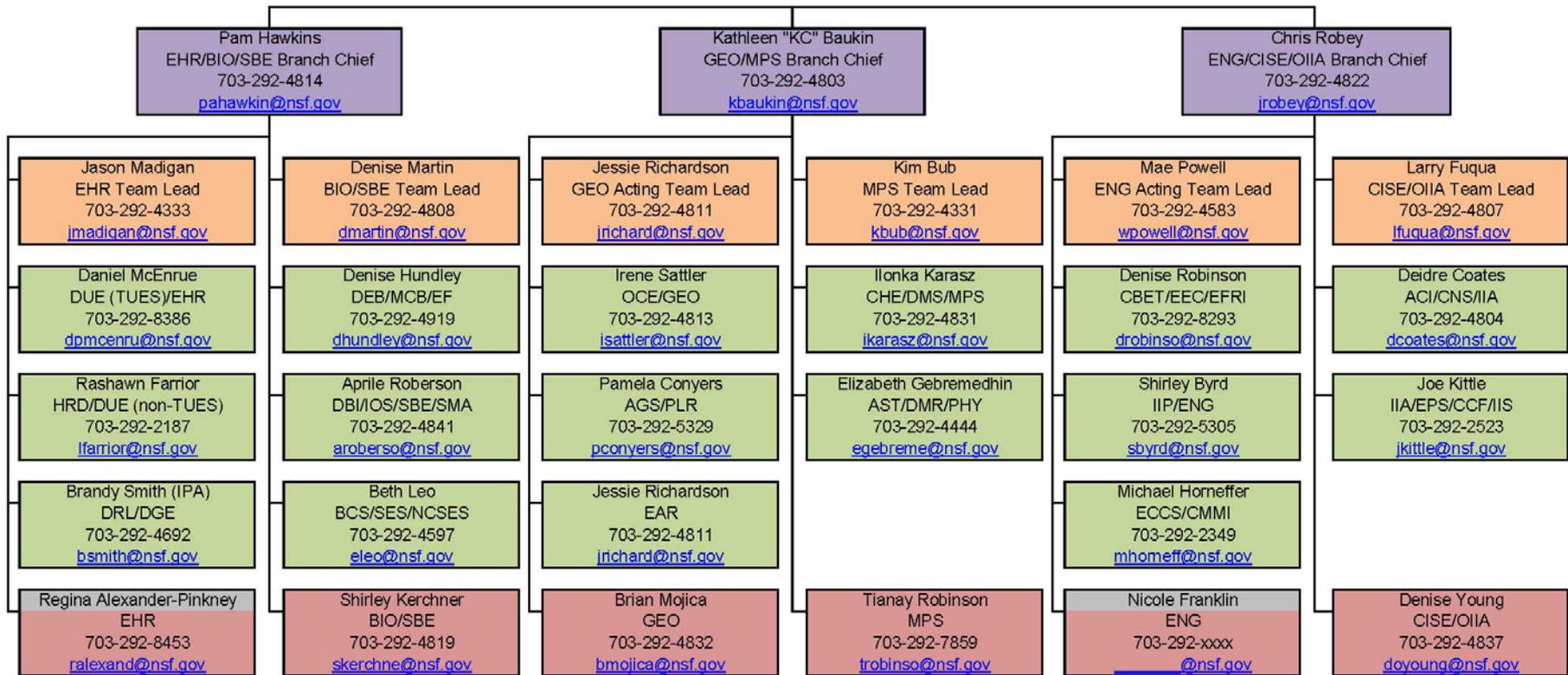
The NSF conducts outreach on proposal preparation and award administration, through [Regional Grant Conferences](#), other targeted outreach programs, as well as [FastLane outreach](#) activities.

The [Division of Grants and Agreements](#) (DGA) is responsible for the award of all NSF grants and agreements recommended for support by NSF program offices, with the exception of the Foundation's portfolio of large facility cooperative agreements. From pre-award through closeout, DGA conducts a variety of business, financial, and administrative reviews to ensure compliance with award terms and conditions, NSF policies and procedures, and Federal rules and regulations. Pre- and post-award reviews of awardee organizations are conducted in coordination with DGA and by the [Division of Institution and Award Support](#) through its [Cost Analysis and Audit Resolution Branch](#). The [Cooperative Support Branch](#) under the [Division of Acquisition and Cooperative Support](#) is responsible for negotiation, award, administration, monitoring and oversight of complex cooperative agreements for Federal Funded Research Centers (FFRDCs), major research facilities, and other large facilities in various stages of the facility lifecycle. The [Cash Management Branch](#) of the [Division of Financial Management](#) manages the awardee payment processes. Quick links to the NSF offices that support Award Management functions, Foundation news impacting awardees, and related information and answers to Frequently Asked Questions (FAQs) are also provided on the [DGA site](#) to assist awardees with managing their awards.

# Division of Grants and Agreements

website: <http://www.nsf.gov/bfa/dga/>

org chart: <http://www.nsf.gov/bfa/dga/docs/liaison.pdf>



# Civil Rights Compliance

**Terri Sisley**

**Complaints Adjudication & Compliance Manager**

NSF Office of the Director

Office of Diversity & Inclusion (ODI)

[tsisley@nsf.gov](mailto:tsisley@nsf.gov)

(703) 292-2104



# **Nondiscrimination: Civil Rights Compliance Requirements**

## **Role of the Office of Diversity and Inclusion.**

- **To ensure the agency is in compliance with the laws and regulations governing federal-sector equal employment opportunity and civil rights.**

## **Compliance requirements for recipients of federal/NSF funds.**

- **All recipients are required to comply with laws and regulations that prohibit discrimination in federally assisted programs and activities.**



# **Nondiscrimination: Civil Rights Compliance Requirements**

- **As part of NSF's proposal guidelines, applicants for NSF funding are to adhere to the various non-discrimination requirements as discussed.**
- **Basically, these federal laws prohibit discrimination on the bases of race, color, national origin, gender, and disability in any program or activity that receives federal funding.**
- **ODI is charged with ensuring recipients are in compliance under applicable statutes via pre- and post-award compliance reviews.**



# **Nondiscrimination: Civil Rights Compliance Requirements**

## **Pre-Award:**

- This is done via submission of an electronic certification at the time of proposal submission. As part of the electronic certification, the Organization's Authorized Representative certifies that the organization agrees to comply with the various nondiscrimination laws and regulations discussed during this presentation. This also applies to sub-recipients.**



# **Nondiscrimination: Civil Rights Compliance Requirements**

## **Post-Award:**

- **This is done via post-award compliance reviews.**
- **Goal is to provide meaningful technical assistance to all recipients that help strengthen their current compliance efforts as well as identify and report on best practices.**
- **Requires recipients to provide information, inclusive of data, on specific programs that relate to federal antidiscrimination requirements.**
- **Limited compliance reviews are currently being conducted as part of the Large Facilities Office's Business Service Reviews (BSRs).**



# **Nondiscrimination: Civil Rights Compliance Requirements**

## **Post-Award:**

- **Conducting Title IX reviews is part of NSF's Career Life Balance (CLB) Initiative. In response, NSF will initially focus primarily on conducting Title IX reviews.**
- **NSF in the process of implementing guidance for compliance reviews that are similar to that in the BSR process.**
- **Compliance reviews will focus on conducting reviews to gather compliance information; collecting promising and innovative practices to share with others, and offering technical assistance where needed.**



# **Nondiscrimination: Civil Rights Compliance Requirements**

- **NSF is also responsible for processing complaints of discrimination from institutions that receive NSF funding.**
- **Complaints are forwarded to NSF's Office of Diversity and Inclusion for processing.**
- **Complaints may also be processed via the institution's internal complaint process.**



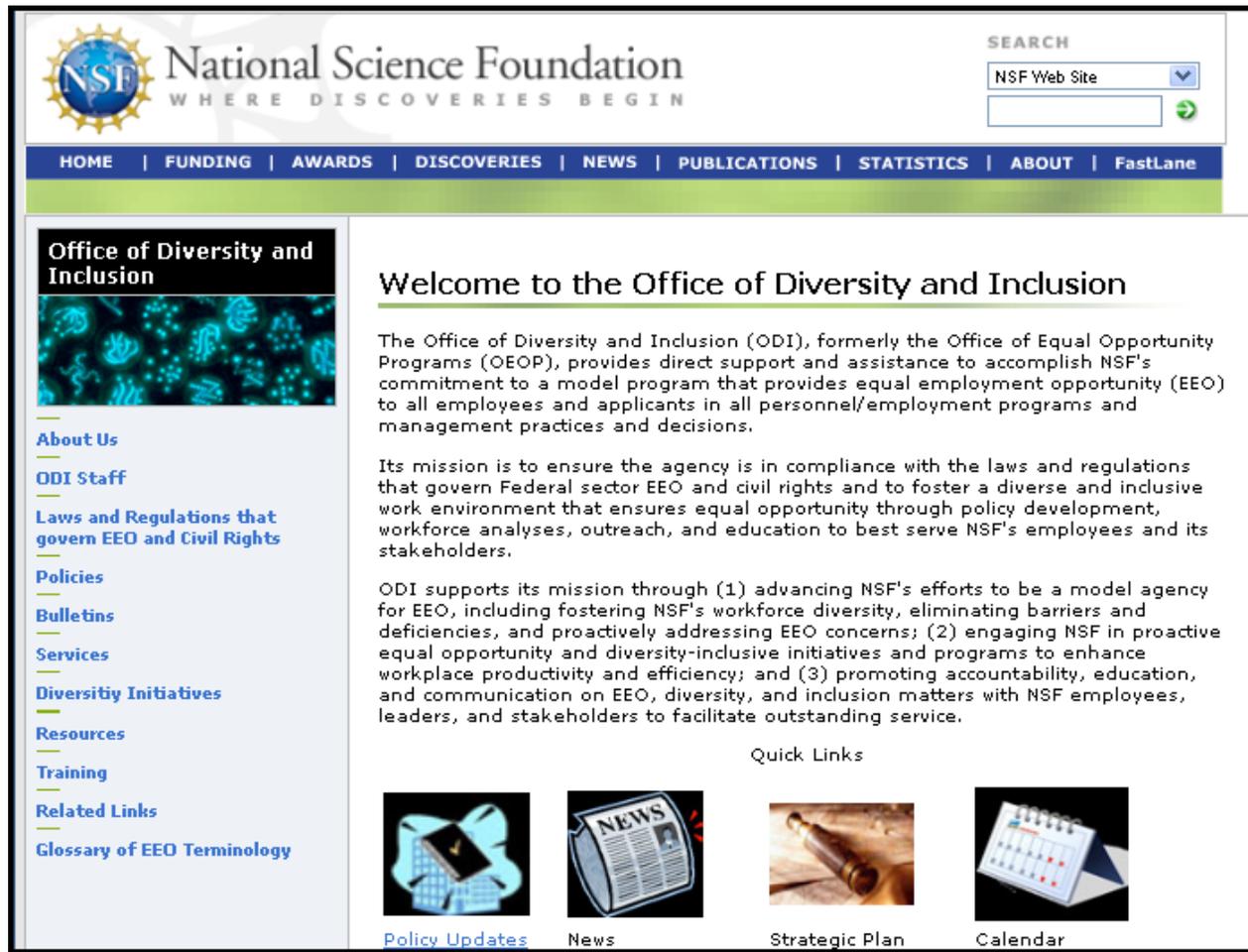
# Nondiscrimination: Civil Rights Compliance Requirements

- NSF's policy is to work with recipients to ensure they are in compliance.
- Failure to comply with one or more of the terms and conditions of NSF grants may result in suspension or termination of the grant.
- NSF will give the recipient notice and the opportunity to correct the deficiency.
- For a review of suspension or termination of procedures, please review NSF's Award and Administration Guide on its website at [www.nsf.gov](http://www.nsf.gov)



# For More Information

Visit <http://www.nsf.gov/od/odi/>



The screenshot shows the NSF Office of Diversity and Inclusion website. At the top left is the NSF logo with the tagline "WHERE DISCOVERIES BEGIN". To the right is a search bar with a dropdown menu set to "NSF Web Site" and a search button. Below the search bar is a navigation menu with links: HOME | FUNDING | AWARDS | DISCOVERIES | NEWS | PUBLICATIONS | STATISTICS | ABOUT | FastLane. The main content area is titled "Office of Diversity and Inclusion" and features a blue and green abstract graphic. Below the title is a list of links: About Us, ODI Staff, Laws and Regulations that govern EEO and Civil Rights, Policies, Bulletins, Services, Diversity Initiatives, Resources, Training, Related Links, and Glossary of EEO Terminology. The main text area is titled "Welcome to the Office of Diversity and Inclusion" and contains the following text: "The Office of Diversity and Inclusion (ODI), formerly the Office of Equal Opportunity Programs (OEOP), provides direct support and assistance to accomplish NSF's commitment to a model program that provides equal employment opportunity (EEO) to all employees and applicants in all personnel/employment programs and management practices and decisions. Its mission is to ensure the agency is in compliance with the laws and regulations that govern Federal sector EEO and civil rights and to foster a diverse and inclusive work environment that ensures equal opportunity through policy development, workforce analyses, outreach, and education to best serve NSF's employees and its stakeholders. ODI supports its mission through (1) advancing NSF's efforts to be a model agency for EEO, including fostering NSF's workforce diversity, eliminating barriers and deficiencies, and proactively addressing EEO concerns; (2) engaging NSF in proactive equal opportunity and diversity-inclusive initiatives and programs to enhance workplace productivity and efficiency; and (3) promoting accountability, education, and communication on EEO, diversity, and inclusion matters with NSF employees, leaders, and stakeholders to facilitate outstanding service." Below the text is a "Quick Links" section with four icons: a blue folder labeled "Policy Updates", a newspaper labeled "News", a telescope labeled "Strategic Plan", and a calendar labeled "Calendar".



**For More Information**

**Ask Early, Ask Often!**

**[nsf.gov/staff](https://www.nsf.gov/staff)**

**[nsf.gov/staff/orglist.jsp](https://www.nsf.gov/staff/orglist.jsp)**

**[nsf.gov/about/career\\_opps/rotators/index.jsp](https://www.nsf.gov/about/career_opps/rotators/index.jsp)**

