

Speakers



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Topics Covered

- Award Process
- Award Processing Delays
- Post-Award Notifications and Requests
- No Cost Extensions
- Award Transfers
- DIAS Cost Analysis and Award Oversight
- Awardee Responsibilities Keys to Success





"Ask Early, Ask Often!"



Mission Statements

DGA

"Support the issuance of NSF assistance awards and other agreements by providing business, financial, and award administration assistance from pre-award through closeout."

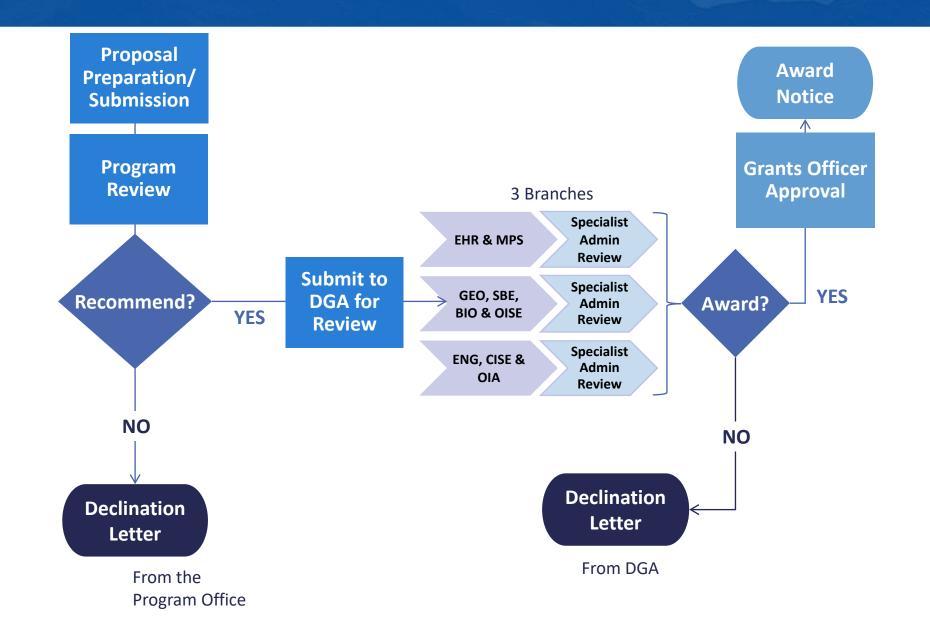
DIAS

"To provide sustained excellence in stewardship across the grants life-cycle through state-of-the-art business practices and exemplary business assistance to key stakeholders within NSF and across the research community. To demonstrate organizational excellence, agility, and innovation in ensuring NSF leadership within the federal R&D enterprise."





NSF Award Process - Overview



NSF Award Process - DGA

What Kind of Awards are Issued by DGA?

- Assistance Awards the principal purpose of which is to transfer anything of value from NSF to the grantee for them to carry out a public purpose; and not to acquire property or services for NSF's direct benefit or use.
 - Grants (Standard and Continuing)
 - Cooperative Agreements
 - Fellowships





How Many Award Actions Does DGA Process Each Year?

DGA Typically Approves

- ~12,000 New Awards
- ~5,000 Supplements/Continuing Grant Increments
- ~5,000 Non-funded actions

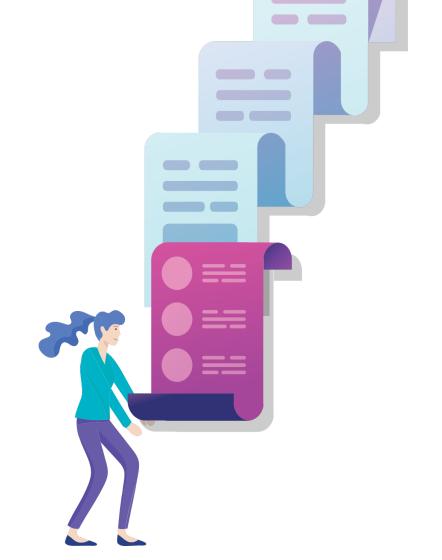




Common Reasons for Delays in Award Processing

Reasons Include...

- Overdue project reports
- Not following solicitation requirements
- Missing Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) approvals
- Unallowable or unjustified budget items







Overdue Project Reports

Consequences

- No future funding subject award or associated awards
- No administrative actions subject award or associated awards
- Can impact other PIs' awards
- Will be reported to FAPIIS (more on this later)

Annual and Final Project Reports

- Must be approved by the NSF Program Officer
- Annual reports are due 90 days prior to the end of the current budget period
- Final reports are due 120 days after the end date of the award

Project Reports

Project Outcomes Report (POR) for the General Public

- Due 120 days after the end date.
- Not approved by the NSF Program Officer.

General Information about Project Reports

- The NSF sends "reminder" notices for all reports when they are due and when they become overdue.
- The report requirements for an award are available to the PI and all Co-PIs via Research.gov.
- The Sponsored Research Office (SRO) can run a report to show reports that are due and overdue via Research.gov for all of the organization's awards.
- Any Active personnel—the PI and all co-PIs--may submit the reports.
- The SRO does not have access to submit the reports.
- When in doubt, contact your Program Officer, or the Research.gov Help Desk.

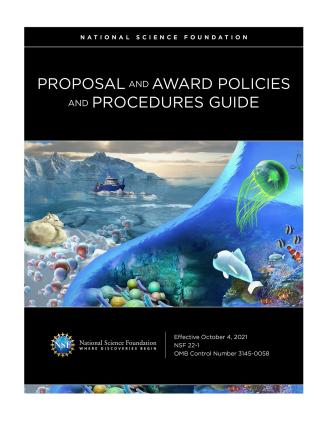


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Project Reports (cont'd)

PAPPG Chapter VII.D. - FPR and POR

By submitting the final project report, the PI is signifying
that the scope of work for the project has been completed
and that he/she does not anticipate that any further
research activities (including a no-cost extension,
supplemental funding, or transfer of the grant) need to be
completed on the project. Submission of the final project
report, however, does not preclude the grantee from
requesting any further payments for costs incurred during
the period of performance.





Project Reports (cont'd)



Project Reports



Welcome | Sign Out (Home) | My Profile | Contact | Help | About

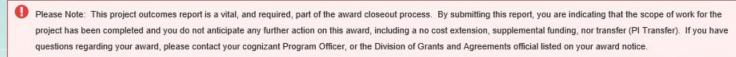
My Desktop

Prepare & Submit Proposals

Awards & Reporting

Manage Financials

Administration



- Hide all notifications (Viewing 1 of 1 notification)

Project Outcomes Report



Overdue Project Reports and FAPIIS



The Uniform Guidance now requires
 Federal awarding agencies to post overdue
 project reports at the time of award
 closeout to a <u>PUBLIC-FACING</u> repository of
 <u>POOR PERFORMERS</u> – the Federal Awardee
 Performance Information and Integrity
 System (<u>FAPIIS</u>).

No one wants to go into FAPIIS. **Don't WAIT UNTIL IT'S TOO LATE.**

 Click <u>here</u> to learn more about the project reporting module on Research.gov and see the current status of your reports.

Technical Reporting Requirements (VII.D)

- Proposed changes have been made to further clarify when project reports should be submitted and when they will become overdue.
- Overdue project reports can delay future funding and award amendment actions and increase administrative burden.
- NSF <u>Important Notice No. 148</u> reinforced that timely project reporting is a term and condition of award and demonstrates results-oriented accountability for NSF awards.
- NSF encourages Authorized Organizational Representatives to regularly check the project reporting status of their awards using the Research.gov Project Reports module.
- NSF is engaging with the topic of project reporting compliance on a variety of levels, including in outreach, in advanced monitoring activities, and in targeted notifications to recipients.



Solicitation Requirements

DGA reviews the proposal to ensure budgetary and administrative conditions are in accordance with the solicitation.

Human Subjects and Vertebrate Animals

- All NSF projects involving human subjects must conform with the Common Rule (45 CFR 690).
- Before an award can be made, all projects involving human subjects must either have an IRB approval or exemption.
- All NSF projects involving vertebrate animals must comply with the Animal Welfare Act and related regulations.
- Before an award can be made, all projects involving vertebrate animals must have an IACUC approval.
- What about awards lacking definite plans for use of human subjects?

Proposal Budgets

Budget Line F, Participant Support Costs

• Know the definition of participant support. Be aware of NSF's policy with respect to participant support and watch out for unallowable entertainment and indirect costs.

Budget Line G, Other Direct Costs

- Subawards (G.5) Be sure that sub-recipient budgets and budget justifications are included as part of the proposal budget.
- Other (G.6) Itemize other direct costs clearly in the budget justification and beware of unallowable costs.



Proposal Budgets (cont'd)

Budget Line I, Indirect Costs

- Charge in accordance with your most recent federally negotiated rate agreement.
- In most cases, a supplement should use the rate used for the original award.

Budget Justification

- No more than five pages.
- The amounts for each budget line item requested must be documented and justified.
- Amounts budgeted must be consistent with the proposing organization's policies and procedures and cost accounting practices used in accumulating and reporting costs.



Typical Areas of Questions for DGA

Conference Proposals and Participant Support Costs

- Definitions of budget line items
- Allowable costs

Addition of Sub-Awards and Sub-Recipient Monitoring

- Submit request through FastLane; must have DUNS number and be registered in FastLane
- Monitoring requirements outlined in 2 CFR 200

Award Close-Out and Mandatory Cost-Share Requirements

- Most awards automatically closed
- If special terms & conditions in award, need requirements fulfilled, reports submitted, manual
 close-out



NSF Prior Approval Matrix: Research Terms and Conditions

Research Terms and Conditions Appendix A Prior Approval Matrix November 12, 2020

	Reference	RTC Overlay	NSF	DOE	NIH	USDA NIFA	DOC	NASA	DHS-GFAD	DHS-FEMA
Prior Written Approval (prior approval)*	200.407									
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)									
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Cost sharing or matching	200.407(b)									
Use of unrecovered indirect costs, including indirect costs on cost sharing or matching.	200.306(c)	Waived	Waived	Waived	Waived	Waived ¹⁵	Waived	Waived	Required	Waived
Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing or matching.	200.306(d)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land.	200.306(h)(2)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Program Income	200.407(c)									
Use of program income during the period of performance (additive method).	200.307(e)(2)	Waived	Waived	Waived	Waived ⁵	Waived	Waived	Waived ²⁰	Waived	Waived
Revision of budget and program plans	200.407(d)									
Change in the scope or the objective of the project or program.	200.308(c)(1)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Change in a key person specified in the application or Federal award.	200.308(c)(2)	Required	Required ¹⁴	Required	Required	Required	Required	Required	Required	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved Project Director (PD) or PI.	200.308(c)(3)	Required	Required ¹⁴	Required	Required ⁶	Required	Required	Required ²¹	Required	Required
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E Cost Principles.	200.308(c)(4)	Required	Waived ¹	Required	Waived ⁷	Required	Required	Required	Required	Required
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(5)	Required	Required ²	Required	Waived ⁸	Required	Required	Required	Required	Required
Subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as decribed in 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services.	200.308(c)(6)	Required	Required	Required	Waived ⁹	Waived ¹⁶	Required	Required	Required	Required
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(7)	Required	Required	Required	Required	Waived ¹⁷	Required	Required	Required	Required
Need for additional Federal funds to complete the project.	200.308(c)(8)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award.	200.308(e)(1)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Required	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(e)(1)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(e)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Required	Waived
Subsequent no-cost extension or extension of more than 12 months.	200.308(e)(2)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Carry-forward of unobligated balances to subsequent budget periods.	200.308(e)(3)	Waived	Waived	Waived	Waived ¹⁰	Waived	Waived	Waived	Required	Waived
Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.	200.308(e)(4)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived	Required	Waived
Restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the simplified acquisition threshold and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency.	200.308(f)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived ^{22, 23}	Required	Waived
Making any fund or budget transfers between construction and non-construction work.	200.308(h)(5)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Real Property	200.407(e)									
Encumber real property acquired with Federal funds.	200.311(b)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Transfer of title to the Federal awarding agency or to a third party.	200.311(c)(3)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Special arrangements and alterations costs incurred specifically for a Federal award.	200.462(a)	Required	Required ³	Required	Waived ¹²	Required	Required	Required	Required	Required





Post Award Requests/Long-Term Disengagement of the Pl or co-Pl



In the event the PI or co-PI is disengaged from the project for greater than three months but intends to return

- Request must be submitted by AOR in Research.gov
- NSF PO will provide written approval if satisfactory
- No formal amendment to grant
- Failure to provide status of absence could lead to termination





Post Award Requests/Participant Support Costs

Approved by the Program Officer

Reallocation of Funds for Participant Support Costs

 Approved by the NSF Program Officer*

Approved by DGA

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).*

- Recommended by the Program Officer, approved by DGA
- These are generally unallowable costs



NSF Monitoring Activities

- 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





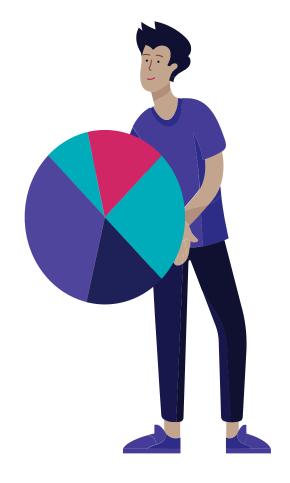
No Cost Extensions

- Awards with \$0 balances cannot be extended.
- Awards cannot be extended just to spend remaining funds.
- Submit Grantee-Approved NCEs at least 10 days prior to the award end date.
- Submit the NSF-Approved NCEs at least 45 days prior to the award end date.
- Research.gov will automatically determine what type of NCE is appropriate based upon eligibility.
- NSF-Approved NCEs may be submitted "late," but you will need to explain why.
- Verify that the no cost extension changed the end date.



No Cost Extensions and Cancelling Appropriations

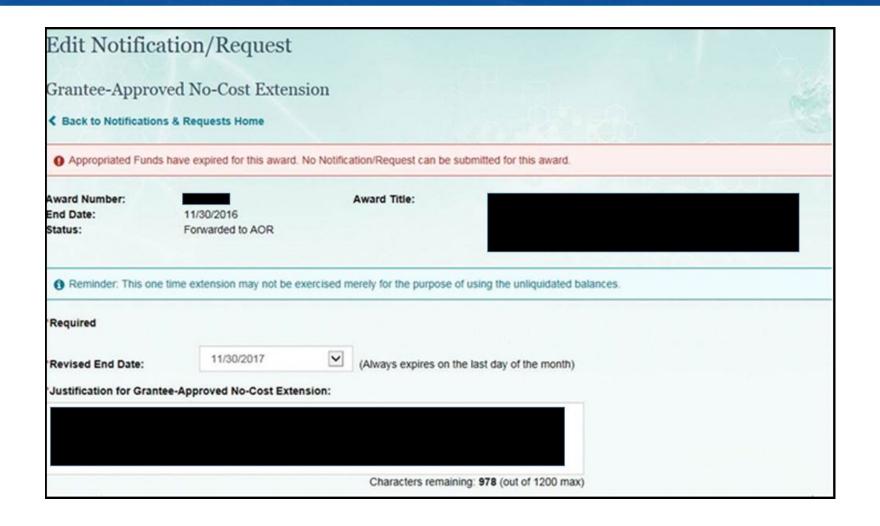
- Most NSF funds have a limited period of availability for expenditure (usually 6 years from the original appropriation year).
- NSF will notify grantees of any cancelling appropriations on open awards so grantees may properly and responsibly expend and drawdown funds before they cancel at the end of the fiscal year.
- Research.gov will block submission of a NCE if the revised end date extends the award beyond the appropriation cancellation date.







No Cost Extension – Expiring Funds Warning





Award Transfers

Grants are awarded to the Organization, not the PI

If the PI is moving to a new Organization, the transferring organization typically has the options below:

- Nominate new PI: The request will be reviewed by the NSF Program Officer, and sent to DGA for final review/approval.
- Request to sub-award
- Agree to transfer New Award issued to New Awardee
- Terminate: Contact DGA and the NSF Program Officer immediately. There is no module for requesting termination of an award.

These and other possible alternatives should be discussed with the DGA Grants Officer.

Some Things to Remember About Award Transfers



- For CAREER awards, only options 3 or 4 can be exercised.
- What if the original award was funded with Established Program to Stimulate Competitive Research (EPSCoR) funds?
 - If the original award received EPSCoR funding, and the new awardee is it a non-EPSCoR State, those funds can't be transferred.
- Make sure you are transferring the correct amount!! Upon transfer of the grant to the new organization, any monetary discrepancies must be resolved between the original and the new grantee. NSF will not intervene in any disputes between the two organizations regarding the transferred amount.

Division of Institution and Award Support (DIAS) Overview

- Policy
- Systems
- Oversight
 - Cost Analysis and Pre-award Branch
 - Resolution and Advanced Monitoring Branch



Unallowable Costs

Unallowable Costs

- Simple Definition
- Delays Budget Proposal Approval
- Costs should align with:
 - Uniform Guidance (2 CFR 200)
 - Part 31 Contract Cost Principles and Procedures (FAR)
 - Proposals & Award Policies & Procedures Guide (PAPPG)
 - Federal Travel Regulations (FTR)



Unallowable Costs

- Proposed vs actual compensation/salary charges received by the employee
- Application of incorrect fringe and indirect cost rates
- Unreasonable travel costs (i.e., hotel rates, meals, personal travel, etc.) and higher than rates allowed
- Meals charged to awards for employees who are not on travel status
- Participant Support costs not adequately documented, especially meals and <u>typically</u> unallowable costs (e.g., entertainment, promotional items, gifts, etc.)
 - Field trips to a baseball park, movie theatre, t-shirts/tote bags with entity/project name, and iPads, etc. These items require specific detail in the proposal budget justification and post award prior approval if need is determined post award.





Criteria Affecting Allowability of Costs

Allowable
§200.403

Reasonable §200.404

- Costs must be both necessary and reasonable for proper and efficient performance and administration of the award.
- Costs must meet the requirements and all limitations contained in the statutes, regulations, and grant terms and conditions, guidance, and solicitation (and university policy).

Allocable

§200.405

- Costs are allocable to a federal award if the goods or services involved are chargeable or assignable in accordance with the relative benefits received.
- Costs may be allocated or transferred to benefitted projects on any reasonable documented basis.
- A documented allocation methodology is required if costs for two or more projects or activities occur in proportions that cannot be determined because of the interrelationship of the work involved,
- Allocable costs can be direct or indirect costs

Treated Consistently

§200.412, §200.413 and §200.414

- Costs may be charged as either direct costs or indirect (F&A) costs, depending on their identifiable benefit to a particular award.
- Costs incurred for the same purpose must be treated consistently across all funding sources.
- Cost may be charged only to the federal award or indirect pool to which they relate, and not or used to meet cost sharing.
- Costs may be charged as either direct costs or indirect (F&A) costs, depending on their identifiable benefit to a particular award.
- Costs incurred for the same purpose must be treated consistently across all funding sources.
- Be charged only to the federal award or indirect pool to which they relate, and not be included as a direct cost or used to meet cost sharing.





Criteria Affecting Allowability of Costs

Conformance

- Conform with federal law
- Conform with state and local policies
- Conform with limitations and exclusions as identified in the terms and conditions for the award
- Consistently treated in accordance with GAAP.
- Not included as match.
- Net of applicable credits.

Adequately Documented

- Documentation must support the conclusion that the costs benefit the award and represent items received. This may include:
 - Effort certified timely;
 - Purchase orders executed consistent with benefit to award (prior to end of performance period).
 - Vendor invoices properly approved; documentation to show that costs are supportable.
 - Costs are properly classified by expense category.

Source: Uniform Guidance CFR 2, Part 200, Subpart E - Cost Principles





WHAT MAKES A COST UNALLOWABLE

Certain Costs are Unallowable in Every Circumstance	Some Unallowable Costs are Allowable in Some Circumstances
§200.423 Alcoholic Beverages	§200.423 Advertising costs are unallowable unless they are necessary to meet the requirements of the sponsored agreement.
§200.424 Alumni activity §200.431 Tuition benefits for family members other than the employee are unallowable.	§200.421 Public Relations Costs are unallowable except for costs specifically required by NSF agreement or for necessary communications with the public regarding the award.
§200.426 Bad debt	§200.426 Participant support costs as defined in 200.75 are allowable with the prior approval of the federal awarding agency
§200.434 Contributions and donations 200.445 Goods and services costs for personal use	§200.432 Allowable conference costs include rental of facilities, costs of meals and refreshments, transportation, unless restricted by the federal award. Temporary dependent care costs above and beyond regular dependent care that directly result from travel to
§200.454 Membership costs	conferences are allowable costs provided that the conditions established in 2 CFR §200.474 are met.



AVOIDING UNALLOWABLE COST PITFALLS

PRIOR WRITTEN APPROVAL

When a change requires NSF approval as specified in Research Terms and Conditions (RTC), Appendix A, the request must be submitted via the Notification and Request Module in Research.gov.

Except for the purpose of obtaining goods and services for the proposer's own use which creates a procurement relationship with a contractor, no portion of the proposed activity may be subawarded or transferred to another organization without prior written NSF authorization. Such authorization must be provided either through inclusion of the subaward(s) on an NSF award budget or by receiving written prior approval from the cognizant NSF Grants and Agreements Officer after an award is issued.

UNBUDGETED SUBAWARDS, CHANGES OF PI OR CO-PI:

For costs to be allowable, per the relevant PAPPGs, the grantee must formally submit the request via Research.gov and receive approval through an amendment to the grant, signed by the NSF Grants Officer.

UNSUPPORTED EXPENSES BY SUBRECIPIENT

The grantee must exercise its duty as the prime awardee to execute the terms of the subrecipient agreement, conduct a risk assessment of the subrecipient(s) and monitor the subrecipient, including ensuring costs charged to the award are documented and substantiated/validated; that record retention terms are consistent with the prime awardee.



AVOIDING UNALLOWABLE COST PITFALLS

PARTICIPANT SUPPORT COSTS

Event support costs may specifically be approved for the award, i.e., equipment rental, building space, and IT services, however those expenses cannot be processed as participant support costs.

INDIRECT COSTS (F&A) are not usually allowed on costs budgeted as participant support unless the grantee's current, Federally approved indirect cost rate agreement provides for allocation of F&A to participant support costs.

Participant support costs must be accounted for separately in the grantee's accounting system.



PARTICIPANT SUPPORT COSTS

Any additional categories of participant support costs other than those described in 2 CFR §200.1 (such as incentives, gifts, souvenirs, t-shirts, and memorabilia), must be justified in the budget justification, and such costs will be closely scrutinized by NSF.

ENTERTAINMENT

Costs of entertainment, amusement, diversion and social activities, and any costs directly associated with such activities (such as tickets to shows or sporting events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

When costs typically considered as entertainment are necessary to accomplish the proposed objectives, they must be included in the budget and justified in the budget justification. Travel, meal, and hotel expenses of grantee employees who are not on travel status are unallowable. CFR §200.438.



AVOIDING UNALLOWABLE COST PITFALLS

MEALS AND COFFEE BREAKS

No funds may be requested for meals or coffee breaks for intramural meetings of an organization or any of its components, including, but not limited to, laboratories, departments, and centers. 2 CFR §200.432, supported by NSF.)

Meal expenses of grantee employees who are not on travel status are unallowable. 2 CFR §200.438.



FRINGE BENEFITS

Fringe benefits are allowable as a direct cost (if not included as an indirect cost) in proportion to the salary charged to the grant, to the extent that such payments are made under formally established and consistently applied organizational policies.

ENTERTAINMENT

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When costs typically considered as entertainment are necessary to accomplish the proposed objectives, they must be included in the budget and justified in the budget justification. Travel, meal, and hotel expenses of grantee employees who are not on travel status are unallowable. CFR §200.438.

Resources

- Uniform Guidance (2 CFR 200)
 - https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200
- FAR Federal Acquisitions Regulations
 - https://www.acquisition.gov/far/part-31
- PAPPG Proposals & Award Policies & Procedures Guide
 - PAPPG Introduction (nsf.gov)
- FTR Federal Travel Regulations
 - www.gsa.gov



DIAS Training, Tools and Resources | NSF - National Science Foundation

Awardee Responsibilities – Keys to Success

- Comply with all relevant federal regulations and national policy requirements.
- Adhere to the terms and conditions of an NSF award.
- Read your award notice carefully! It may include project or award-specific requirements, such as:
 - Funding restrictions
 - Special reporting requirements
 - Special terms and conditions or other instructions



Awardee Responsibilities – Keys to Success (cont'd)

- Make sure the award has an active PI.
- Manage funds prudently:
 - Allowable
 - Allocable
 - Reasonable
 - Necessary
- Track report requirements.
- Establish appropriate policies and procedures (written), oversight, and internal controls.





Awardee Responsibilities – Keys to Success (cont'd)

- Train staff so they understand their roles and responsibilities.
- Be consistent!
- Maintain timely and effective lines of communication. Know who to contact for relevant information. In general...
 - *Your NSF Program Officer for technical/scientific questions *Your Sponsored Research Office (SRO) for administrative questions
 - **SRO:** *DGA Portfolio Manager for <u>award specific questions</u>. Always include the award number in any email or communications to assist us with responding to your inquiry.
 - *NSF Policy Office with general grant policy questions



For More Information

"Ask Early, Ask Often!"

- NSF Division of Financial Management for questions related to payment, financial policy, financial reporting, ACMS.
- Follow Research.gov and FastLane directions and edits
- Read error messages received in Research.gov and FastLane make screen shots to include in emails to Help Desk and PO
- Remember to submit sub-recipient information to the Federal Subaward Reporting System (FSRS)
- For Research.gov questions, call the Research.gov Help Desk at 1-800-381-1532
- For FastLane questions, call FastLane at 1-800-673-6188
- Policy Office Website: https://www.nsf.gov/bfa/dias/policy/
- DGA Website: https://www.nsf.gov/bfa/dga/

