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

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**

Notification to 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**

Notification to NSF IS required for:

- 12 Month No-Cost Extension
  - 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)

Notification to 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

Notification to 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-9, highlights certain budget changes that may require prior NSF approval
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.

<table>
<thead>
<tr>
<th>Type of Grantee Notification</th>
<th>AAG Citation</th>
<th>Direct questions to:</th>
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<tbody>
<tr>
<td>• Grantee-Approved No-Cost Extension</td>
<td>I.D.3.c(i)</td>
<td>Grants Office</td>
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<tr>
<td>• Significant Changes in Methods/Procedures</td>
<td>II.B.1.b</td>
<td>Grants Office</td>
</tr>
<tr>
<td>• Significant Changes/Delays or Events of Unusual Interest</td>
<td>II.B.1.c</td>
<td>Grants Office</td>
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<tr>
<td>• Annual and Final Cost Share Notification by Recipient</td>
<td>II.D.5</td>
<td>Grants Office</td>
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<td>• 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</td>
<td>IV.A</td>
<td>Grants Office</td>
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<tr>
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<th>GPG</th>
<th>AAG</th>
<th>Direct questions to:</th>
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<tr>
<td>• Subawarding, Transferring or Contracting Out</td>
<td>II.C.2.g(vi)(e)</td>
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<tr>
<td>• First NSF-Approved No-Cost Extension</td>
<td>I.D.3.c(ii)(a)</td>
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<td>• Change in Person-Months Devoted to Project</td>
<td>II.B.2.d</td>
<td>Grants Office</td>
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<td>• Withdrawal of PI/PD or co-PI/co-PD</td>
<td>II.B.2.e</td>
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<td>• Substitute PI/PD or co-PI/co-PD</td>
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<tr>
<td>• PI/PD or co-PI/co-PD Transfer from One Organization to Another</td>
<td>II.B.2.g</td>
<td>Grants Office</td>
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<tr>
<td>• Pre-award Costs in Excess of 90 Days</td>
<td>V.A.2.b</td>
<td>Grants Office</td>
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<td>• Salaries of Administrative or Clerical Staff</td>
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<tr>
<td>• Travel Costs for Dependents</td>
<td>II.C.2.g(iv)(a)</td>
<td>Program Office</td>
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<td>• Rearrangements/Alterations in excess of $25,000 (Construction)</td>
<td>V.C.1</td>
<td>Grants Office</td>
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<td>• Reallocation of Funds Provided for Participant Support Costs</td>
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<td>• Additional categories of participant support costs</td>
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<td>Program Office</td>
<td></td>
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<td>• Change to cost sharing commitments reflected on Line M of the NSF award budget</td>
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**Final action by Grants and Agreements Officer, when warranted.

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.


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

- Research Terms & Conditions & NSF Agency Specific Requirements (RTC-NSF)
  - Article 24, Cost Sharing or Matching
- Cooperative Agreement (CA-FATC)
  - Article 29, “Cost Sharing and Cost Sharing Records”
    - Reflected on Line M of the cumulative award budget
    - If cost share is $500,000 or more, cost sharing certification required annually
    - Written cost sharing policies and procedures
    - Must be matched by the grantee from a non-Federal source

Cost Sharing (cont’d)

- 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
- Only 7 programs have been approved to require cost sharing
  - Major Research Instrumentation Program (MRI)
  - Robert Noyce Scholarship Program
  - Engineering Research Centers (ERC)
  - Industry/University Cooperative Research Centers (I/UCRC)
  - Innovation Corps (I-Corps)
  - Research Experiences for Undergraduates (REU)
  - Experimental Programs to Stimulate Competitive Research (EPSCoR)
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
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

nsf.gov/awards/managing/

NSF Friendly Reminder...

ASK EARLY!

ASK OFTEN!

To find contact information for NSF staff, please search nsf.gov/staff or reference NSF’s organization chart at nsf.gov/staff/orglist.jsp