# FALL GRANTS CONFERENCE













NOVEMBER 18 - 19, 2019 • BOSTON, MASSACHUSETTS



## **NSF Speakers**

### Jeff Vieceli

System Administrator & Head, Systems Office Division of Institution & Award Support (DIAS) Office of Budget, Finance & Award Management (BFA)



## **Lori Wiley**

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



# **Topics Covered**

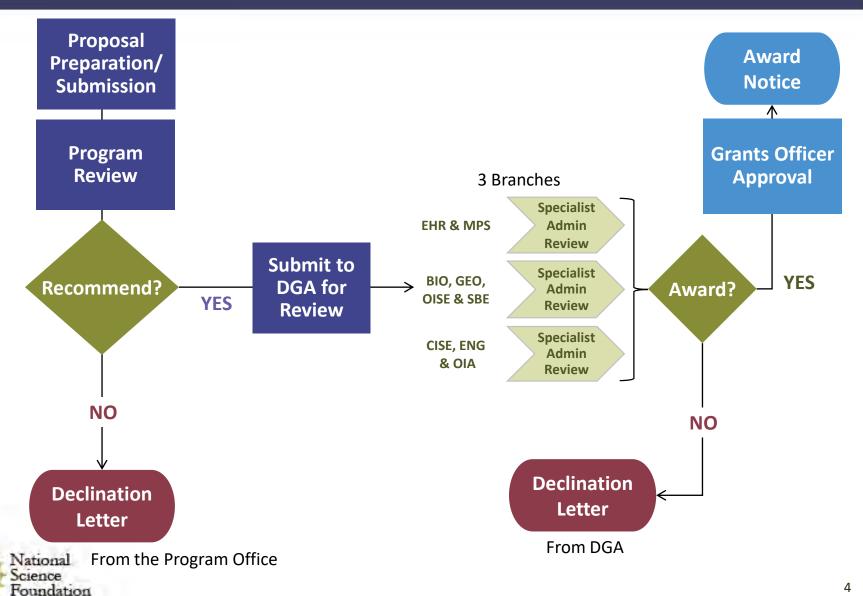
- Award Process
- Award Processing Delays
- No-Cost Extensions
- Post-Award Notifications and Requests
- NSF Monitoring Activities
- New NSF Award Notice
- Awardee Responsibilities –
   Keys to Success





"Ask Early, Ask Often!"

## **NSF Award Process - Overview**



# **Types of Awards Issued**

Assistance Awards - the principal purpose is to transfer anything of value from NSF to an awardee to carry out a public purpose and not to acquire property or services for NSF's direct benefit or use.

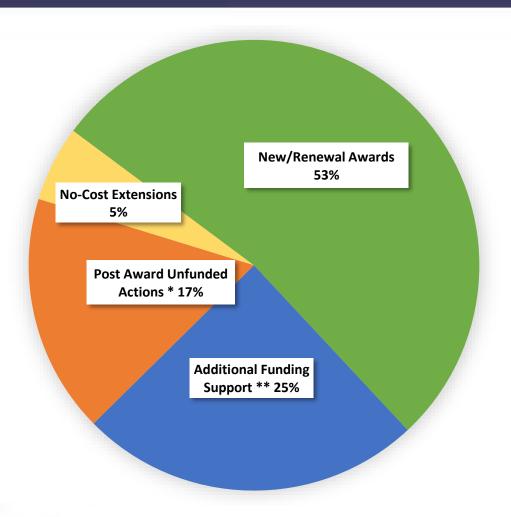
- Grants (Standard and Continuing)
- Cooperative Agreements
- Fellowships

#### **DGA Mission Statement**

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



# **Award Actions Processed by DGA in FY 2019**



\$5.7 billion obligated 21,579 actions



<sup>\*</sup> includes other admin actions (e.g., PI changes, subawards, etc.), PI/award transfers, and cancellations/reductions

<sup>\*\*</sup> includes forward funded CGIs, increments, supplements, and creativity extensions

# **Award Processing Delays**

#### Reasons Include...

- Unallowable or unjustified budget items
- Not following solicitation requirements
- Missing IRB and IACUC approvals
- Overdue project reports



# **Proposal Budgets**

## **Budget Justification**

- Follow proposal preparation instructions in the PAPPG;
- Justification no more than five (5) pages;
- Each budget line item amount must be documented and justified;
- All subawards must have separate budget/justification; and
- Amounts must be consistent with proposing organization's policies, procedures, and cost accounting practices used in accumulating and reporting costs.



# Proposal Budget (cont'd)

### **Budget Line F, Participant Support Costs**

 Know the definition of participant support and only include those allowable costs under this budget line. Be aware of unallowable entertainment and exclusion of indirect costs.

### **Budget Line G, Other Direct Costs**

• If project costs do not fall within any other budget line, then use "Other" (G.6) and explicitly explain the costs in the justification to ensure only allowable costs are being requested.

## **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 from the federally negotiated agreement used for the original award.



## **Other Requirements**

#### **Solicitation Requirements**

 All budgetary and administrative conditions in solicitation must be addressed.

#### **Vertebrate Animals**

- Must comply with the Animal Welfare Act and related regulations.
- Institutional Animal Care and Use Committee (IACUC) approval is required before an award can be made.

### **Human Subjects**

- Must conform with the Common Rule (45 CFR 690).
- Institutional Review Board (IRB) approval or declaration of exemption is required before an award can be made.
- Projects lacking definite plans for use of human subjects shall provide a
  determination notice indicating that no work with human subjects, including
  recruitment, will be conducted until full IRB approval is obtained.



# **Overdue Project Reports**

## **Annual and Final Project Reports**

- Annual reports due 90 days prior to end of current budget period
- Final reports due within 120 days of award end date
- Must be approved by the NSF Program Officer within these reporting time periods or will be overdue (submit early!)

### **Consequences of Overdue Reports**

- Prevents NSF approval of <u>all</u> actions (funded and administrative) for the subject award and any associated awards for both the PI and any co-PIs
- Delayed submission can impact other PIs' awards especially critical during the 4<sup>th</sup> quarter of the fiscal year



# **Project Report Reminders**

## **General Information about Project Reports**

- Project report requirements are available to the PI and all Co-PIs via Research.gov.
- The SRO also can run reports on Research.gov for their all of the organization's awards that are due and overdue to ensure compliance with award terms and conditions.
- NSF sends "reminder" notices for all reports when due and date report becomes overdue.
- Active PIs and all Co-PIs may submit the reports.
- The SRO does not have access to submit the reports.
- When in doubt, contact your NSF Program Officer, or the Research.gov Help Desk.



# **Project Reports**

## **PAPPG Chapter VII.D. – Technical Reporting**

- 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 Outcomes Report (POR) and any other required reporting (e.g., final cost share notification) are also due within 120 days of the award end date.



## **Project Reports**



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Prepare & Submit Proposals

**Awards & Reporting** 

Manage Financials

Administration

• Please Note: The final project report is a vital, and required, part of the award closeout process. By submitting the report, you are indicating that the scope of work for the project has been completed and you do not anticipate any further action on the award, including a no cost extension, supplemental funding, nor transfer (PI Transfer). If you have questions regarding your award, please contact your cognizant Program Officer, or the Division of Grants and Agreements official listed on your award notice.

Hide all notifications (Viewing 1 of 1 notification)

#### **Project Reports**



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🕕 Please Note: This project outcomes report is a vital, and required, part of the award closeout process. By submitting this report, you are indicating that the scope of work for the project has been completed and you do not anticipate any further action on this award, including a no cost extension, supplemental funding, nor transfer (PI Transfer). If you have questions regarding your award, please contact your cognizant Program Officer, or the Division of Grants and Agreements official listed on your award notice.

Hide all notifications (Viewing 1 of 1 notification)

#### **Project Outcomes Report**



# Requests for No-Cost Extensions (NCEs)

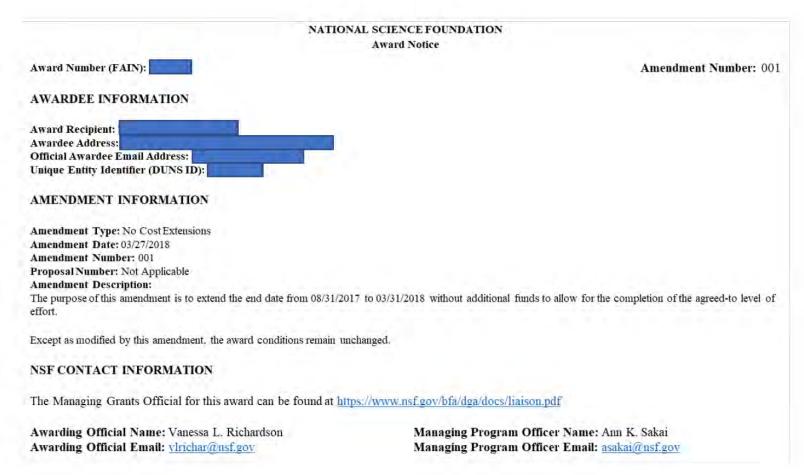
## **Requirements:**

- NCEs cannot be used to spend remaining funds or requested for awards with \$0 balances.
- Submit Grantee-Approved NCE notification at least 10 days prior to award end date.
- Submit NSF-Approved NCE requests for approval at least 45 days prior to award end date.
- Research.gov will automatically determine what type of NCE is appropriate based upon eligibility and timing.
- Any NCE requests submitted "late" must include strong justification for the delay.



## No-Cost Extension – A New Notice

## **New NSF-Approved No-Cost Extension Award Notice**



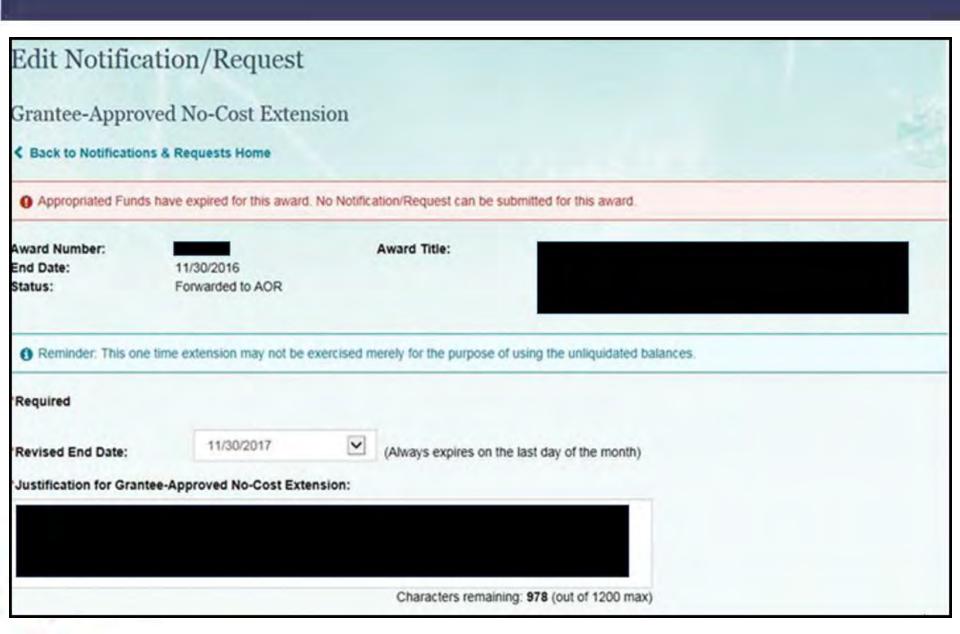


## **Limitations on No-Cost Extensions**

- Do not make new commitments or incur new expenditures after the award end date in anticipation of receiving approval for a nocost extension.
- Be aware that most NSF appropriated funds have a limited period of availability for expenditure before the appropriation cancels.
- Research.gov will block submission of a NCE if the revised end date extends the award beyond September 30<sup>th</sup> of the appropriation cancellation year for <u>all</u> funds.
- If a small portion of funds (e.g., supplement) remains available beyond requested end date, a NCE can be processed; however, the no-cost extension will NOT extend the period of availability of any canceling funds.



# **No-Cost Extension – Canceling Funds Warning**



# **Canceling Appropriations**

In accordance with 31 USC 1552(a), funds will no longer be available for expenditure for any purpose beyond September 30th of the fifth fiscal year after the expiration of a fixed appropriation's period of availability for incurring new obligations.

- NSF's R&RA and EHR funds will generally cancel approx. 6 fiscal years after the funds are awarded.
- ACM\$ flags awards with canceling funds and NSF sends detailed notifications to ACM\$ of cancelling appropriations on open awards.
- Grantees must properly and responsibly expend and drawdown funds for costs to be incurred before the funds cancel on September 30<sup>th</sup>.
- During fiscal yearend, awards with all remaining funds canceling will be financially closed and unable to request upward adjustments. (See PAPPG Chapter VIII.E.)



# **Research Terms & Conditions Prior Approval Matrix**

#### Research Terms and Conditions Appendix A

https://www.nsf.gov/bfa/dias/policy/fedrtc/appendix\_a.pdf

Prior Approval Matrix December 10, 2018

		Reference	RTC Overlay	NSF	DOE	NIH	USDA	DOC	NASA
Prior Written Approval (prior approval)*		200.407	254		L				1
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts		200.407(a)	- 7						
Changes in principal investigator (PI), project leader, project partner, or scope of effort.		200.201(b)(5)	Required	Required	Required	Required	Required	Required	Require
ost 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 <sup>15</sup>	Waived	Waived
Use of current fair market value to determine the value of non-Federal entity donations of services and property for the purposes of cost sharing or matching.		200.306(d)(2)	Waived	Waived	Waived	Waived	Walved	Waived	Require
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	Require
ogram Income		200 407(c)			1			1	ř –
Use of program income during the period of performance vision of budget and program plans	Prepare New Notification / Re	equest					Mi	chigan State	University
Change in the scope or the objective of the project or pro Change in Pt/PD specified in the application or Federal a	← Back to Notifications & Requests     ← Policy Guidance								
Disengagement from the project for more than three mor project by the approved PI/PD.	Prepare New								
Inclusion, unless waived, of costs that require prior appro Transfer of funds budgeted for participant support costs t Subawarding, transferring or contracting out any work un to the acquisition of supplies, material, equipment or gen Changes in the approved cost-sharing or matching provic Need for additional Federal funding to complete the proje Incur project costs 90 calendar days before the Federal a Incur project costs more than 90 calendar days pre-award Initiate a one-time extension of the period of performance Subsequent no-cost extension or extension of more than Carry-forward of unexpended balances to subsequent fur Transfer amounts budgeted for indirect costs to absorb in Rebudgeting among direct cost categories for Federal av transfers exceeds or is expected to exceed 10 percent of Transfer of funds between construction and non-construct in Property  Encumber real property acquired with Federal funds. Transfer of title to the Federal awarding agency or to a th Special arrangements and alterations costs incurred specifipment	Step 1: Select type of change  All  Budget Activities  No-Cost Extensions  Changes in Objectives, Scope, or Methodology at  Changes in PI/PD, co-PI/co-PD or Person-Months  Other  Step 2: Select notification / request  "The "Other Request" option must only be used to submit prior apporteria will be rejected.  Travel Costs for Dependents  Step 3: Enter award number and click 'Prepare Award Number:	s Devoted to the Project	at the Initiation of the G	that do not airea		c request type. At	ny request submit	tted that does not	meet this
Encumber equipment acquired with Federal funds.									
d amount subawards		200.407(g)							
Subawards based on fixed amounts up to the simplified acquisition threshold, provided the subawards meet the requirements for fixed amount awards in 200.201.		200.332	Required	Required	Required	Required	Required	Required	Req

# **NSF Prior Approval Requests**

## **Highlights / Most Common Requests:**

- Change in PI or co-PI
- Disengagement of PI (>3 months or 25% reduction of time)
  - Approved by PO if satisfactory (no grant amendment)
  - Failure to provide status of absence could lead to termination
- Transfer of funds from participant support to other categories
- Incur pre-award costs more than 90 days before award start date
- Changes in scope or project objectives
- Subawarding, transferring, or contracting out any work not approved with the original award
  - Submit subaward request through FastLane
  - Subawardee must have DUNS number and be registered in FastLane



## **Award Transfers**

## Grants are awarded to the Organization, not the PI

## Possible options for organization if PI requests transfer:

- Nominate new PI: request will be reviewed by the NSF PO and sent to DGA for final review/approval
- 2) Request to **subaward** to new organization
- 3) Agree to transfer: New Award issued to New Awardee
- 4) Request to **terminate**: Contact DGA and the NSF PO immediately for next steps (no module for requesting termination of an award)

Contact DGA Grants Officer for alternatives, if available.



# **Award Transfers Limitations & Tips**

- For CAREER awards, only options 3 or 4 can be exercised.
- Funding and solicitation requirements:
  - Established Program to Stimulate Competitive Research (EPSCoR) funds can only be transferred to an EPSCoR state
  - Solicitation requirements must be met by new awardee
- Make sure to transfer 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.
  - Also note that transferred funds retain their limitation of availability from the original award (i.e., canceling appropriations).



# **NSF Monitoring Activities**

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





## **New Award Notices**

## **Implementation with Award System Modernization**

- Opportunity to Standardize, Streamline and Simplify
- Ensures compliance with Uniform Guidance and other policies
- Allow NSF to copy PIs and co-PIs on Award Notices
- Simplify processing for award-making Divisions
  - ✓ Less reliance on code-changes/reprogramming
  - ✓ Less prone to issues due to technology upgrades

## **Released in April 2019**

- Incremental Funding
- Supplemental Funding
- Creativity Extensions
- Forward Funded Increments

## **New Awards scheduled for January 2020**



## **New Award Notice - Actions with Funding**

#### NATIONAL SCIENCE FOUNDATION Award Notice

Award Number (FAIN): Managing Division Abbreviation: AST

Amendment Number: 004

#### AWARDEE INFORMATION

Award Recipient:
Awardee Address:

Official Awardee Email Address: Unique Entity Identifier (DUNS ID):

#### AMENDMENT INFORMATION

Amendment Type: Supplement Amendment Date: 06/26/2018 Amendment Number: 004 Proposal Number: Not Applicable Amendment Description:

The purpose of this amendment is to:

- Add supplemental support to the award in the amount shown below in the Funding Information section as modified by the revised budget dated June 15, 2018.
- Extend the end date from 6/31/2018 to 1/31/2019.

Funds provided by this award include support for "Research Experiences for Teachers (RET)" in accordance with NSF Program Solicitation 17-575 (ENG & CISE), NSF Dear Colleague Letter 12-075 (BIO), or NSF Program Solicitation 13-542, "Research Experiences for Undergraduates (REU)."

Except as modified by this amendment, the award conditions remain unchanged.



# Awardee Responsibilities – Keys to Success

- 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
- Comply with all relevant...
  - ✓ Federal regulations,
  - National policy requirements, and
  - ✓ All terms and conditions



# Awardee Responsibilities – Keys to Success (cont'd)

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



# Awardee Responsibilities – Keys to Success (cont'd)

- Train staff to understand their roles and responsibilities.
- Maintain timely and effective lines of communication.
- Know who to contact\* for relevant information:
- \*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>

  (DGA assigned by Program Division 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



# Tips & Contacts for More Information . . .

## "Ask Early, Ask Often!"

- Questions on payments, ACM\$, financial policies and reporting NSF's
   Division of Financial Management: <a href="www.nsf.gov/bfa/dfm/cmeab.jsp">www.nsf.gov/bfa/dfm/cmeab.jsp</a>
- Tips for assistance with Research.gov and FastLane:
  - ✓ Follow directions and edits
  - ✓ Read error messages and make screen shots to include in any emails to Help Desk and/or NSF PO
  - ✓ call Research.gov Help Desk at 1-800-381-1532
  - ✓ call FastLane at 1-800-673-6188
- Policy Office (proposal & award policies): <a href="https://www.nsf.gov/bfa/dias/policy">www.nsf.gov/bfa/dias/policy</a>
- DGA (grant-specific inquiries): www.nsf.gov/bfa/dga

