FALL 2020 VIRTUAL GRANTS CONFERENCE



Award Management



Speakers

Kandis Boyd

Deputy Division Director Division of Grants and Agreements Office of Budget, Finance & Award Management

Michael Horneffer

Grants and Agreements Officer Division of Grants and Agreements Office of Budget, Finance & Award Management

Jeff Vieceli

System Administrator & Head, Systems Office Division of Institution & Award Support Office of Budget, Finance & Award Management



Topics Covered

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



"Ask Early, Ask Often!"



Mission Statements

• DGA

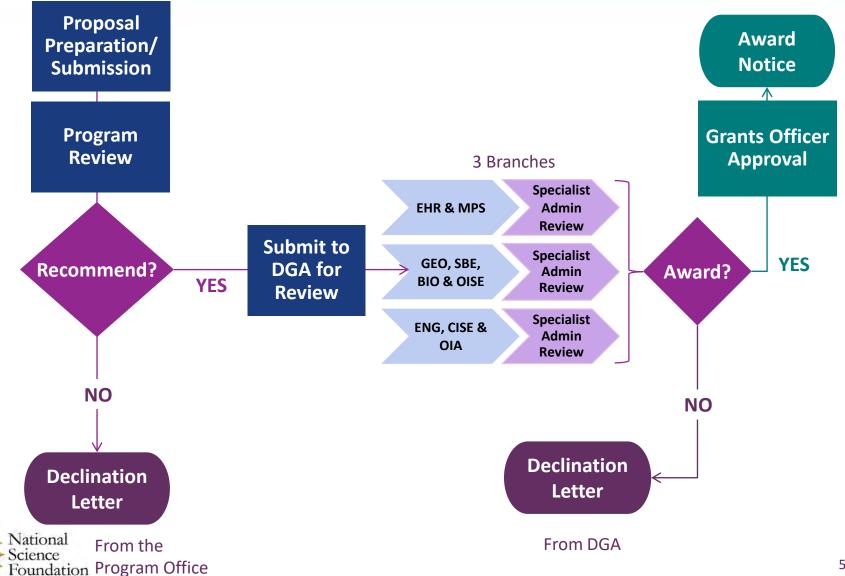
"Support the issuance of NSF assistance awards and other agreements by providing business, financial, and award administration assistance from preaward through closeout."

• 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

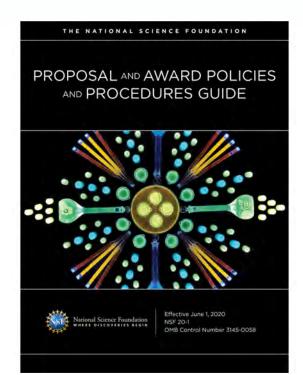
- The NSF sends "reminder" notices for all reports when they are due and when they become overdue.
- The report requirements for an award are available to the PI and all Co-PIs via Research.gov.
- The Sponsored Research Office (SRO) can run a report to show reports that are due and overdue via Research.gov 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.



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 nocost 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)



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

December 10, 2018

	Reference	RTC Overlay	NSF	DOE	NIH	USDA	DOC	NASA
Prior Written Approval (prior approval)*	200.407	4.8-				2		
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)	16				S		-
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required	Required	Required	Required	Required	Required
Cost sharing or matching	200.407(b)			10.000		1		
Use of unrecovered indirect costs, including indirect costs on cost sharing or matching.	200.306(c)	Waived	Waived	Waived	Waived	Waived ¹⁵	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	Waived	Waived	Required
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
Program Income	200.407(c)			1	T	1		1
Use of program income during the period of performance (additive method).	200.307(e)(2)	Waived	Waived	Waived	Waived ⁵	Waived	Waived	Waived ²⁰
evision of budget and program plans	200.407(d)	1	12	1000	12.000	5		
Change in the scope or the objective of the project or program.	200.308(c)(1)(i)	Required	Required	Required	Required	Required	Required	Required
Change in PI/PD specified in the application or Federal award.	200.308(c)(1)(ii)	Required	Required ¹⁴	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 PI/PD.	200.308(c)(1)(iii)	Required	Required ¹⁴	Required	Required	Required	Required	Required ²¹
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E Cost Principles.	200.308(c)(1)(iv)	Required	Waived ¹	Required	Waived ⁷	Required	Required	Required
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(1)(v)	Required	Required ²	Required	Waived ⁸	Required	Required	Waived ²²
Subawarding, transferring or contracting out any work under a Federal award. This provision does not apply to the acquisition of supplies, material, equipment or general purpose services.	200.308(c)(1)(vi)	Required	Required	Required	Waived ⁹	Waived ¹⁶	Required	Waived
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(1)(vii)	Required	Required	Required	Required	Waived ¹⁷	Required	Waived
Need for additional Federal funding to complete the project.	200.308(c)(1)(viii)	Required	Required	Required	Required	Required	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the award.	200.308(d)(1)	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(d)(1)	Required	Required	Required	Required	Required	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(d)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Subsequent no-cost extension or extension of more than 12 months.	200.308(d)(2)	Required	Required	Required	Required	Required	Required	Required
Carry-forward of unexpended balances to subsequent funding periods.	200.308(d)(3)	Waived	Waived	Waived	Waived ¹⁰	Waived	Waived	Waived
Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.	200.308(d)(4)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived
Rebudgeting among direct cost categories for Federal awards in which the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the approved budget.	200.308(e)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived ^{22, 2}
Transfer of funds between construction and non-construction activities.	200.308(g)(5)	Required	Required	Required	Required	Required	Required	Required
eal Property	200.407(e)							
Encumber real property acquired with Federal funds.	200.311(b)	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
Special arrangements and alterations costs incurred specifically for a Federal award.	200.462(a)	Required	Required ³	Required	Waived ¹²	Required	Required	Required
quipment	200.407(f)	1	- and an erall	1	- Alter	0.000		
Encumber equipment acquired with Federal funds.	200.313(c)(1)	Required	Required	Required	Required	Required	Required ¹⁹	Waived
ixed amount subawards	200.407(g)	1			1		1 Jung all old	1
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	Required

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



National Science Foundation 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



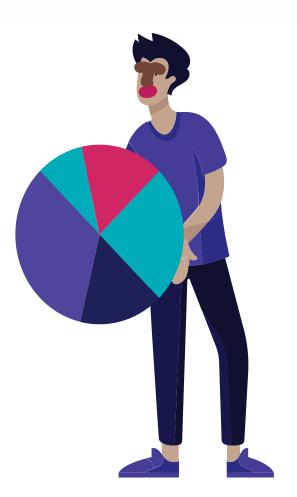
No Cost Extensions

- 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

Edit Notifica	ation/Request			
Grantee-Approv	ved No-Cost Exten	sion		1
< Back to Notification	is & Requests Home			
Appropriated Funds	s have expired for this award.	No Notifica	ation/Request can be submitted for this award.	
Award Number:	-		Award Title:	
End Date: Status:	11/30/2016 Forwarded to AOR			
Reminder: This one Required	time extension may not be e	exercised m	erely for the purpose of using the unliquidated balances.	
Revised End Date:	11/30/2017	~	(Always expires on the last day of the month)	
Justification for Grant	ee-Approved No-Cost Exte	nsion:		
			Characters remaining: 978 (out of 1200 max)	

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



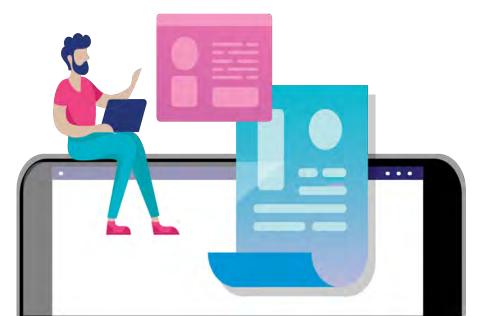


- For CAREER awards, only options 3 or 4 can be exercised.
- What if the original award was funded with Established Program to Stimulate Competitive Research (EPSCoR) funds?
 - If the original award received EPSCoR funding, and the new awardee is it a non-EPSCoR State, those funds can't be transferred.
- 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.

New Award Notices

- Opportunity to Standardize, Streamline and Simplify
- Ensures that NSF is compliant with
 Simplify processing for award-Uniform Guidance and other policies
- Create easy-to-read layout
- Take advantage of new technology
 Less prone to issues due to

- Allow NSF to cc PIs and co-PIs on Award Notices
- making Divisions
- Less reliance on codechanges/reprogramming
- technology upgrades





New Award Notice – PI Transfers

To be Released – November 2020

- Same General Format
- Last Award Notice to be Redone
- Additional Plans for Enhancements
- This is not a complete redo of the transfer process—which is also planned





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





Federal Awardee Performance Information and Integrity System (FAPIIS)

www.FAPIIS.gov

- Federal agencies are required to report award terminations to FAPIIS in accordance with 2 CFR §200.340.
- Federal award recipients are required to self-report certain proceedings in accordance with 2 CFR §200, Appendix XII.
- Federal agencies are required to evaluate FAPIIS information prior to issuing new awards in accordance with 2 CFR §200.205.
- <u>2 CFR § 200.344</u> now requires Federal awarding agencies to report when a non-Federal entity does not submit final closeout reports as a failure to comply with the terms and conditions of the award to the OMB-designated integrity and performance system (currently FAPIIS).
- As of November of 2020, Federal agencies will be required to report to FAPIIS a failure to comply with the terms and conditions of award when a non-Federal entity does not submit final closeout reports within 1 year of the award end date (<u>2 CFR § 200.344</u>)



FAI	PIDIS		al Awardee Perf tegrity Inform				
Home	Data Reports	Help	Policy	Search FAPIIS Site			
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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...
 - PI: *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/

