



National Science Foundation
WHERE DISCOVERIES BEGIN

NSF Policy Update

NSF Grants Conference

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Panelist

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Topics

- Uniform Guidance - Background
- *Proposal & Award Policies & Procedures Guide* (PAPPG) Update
 - Uniform Guidance Implementation
 - Other Significant Policy Changes
- Automated Compliance Checking for Proposals
- Research Performance Progress Report Update
- Award Cash Management Service (ACM\$)



Uniform Administrative Guidance – What is it?

- This reform streamlines the language from eight existing OMB circulars into one consolidated set of guidance in the code of Federal regulations.
- This consolidation is aimed at eliminating duplicative or almost duplicative language in order to clarify where policy is substantively different across types of entities, and where it is not. As a result, the guidance includes sections and parts of sections which are clearly delineated by the type of non-Federal entity to which they apply.



Goal of the Reform Effort

- The goal of this reform is to deliver on the President's directives to: (1) streamline guidance for Federal awards to ease administrative burden; and (2) strengthen oversight over Federal funds to reduce risks of waste, fraud, and abuse.
- Streamlining existing OMB guidance will increase the efficiency and effectiveness of Federal awards to ensure best use of the more than \$600 billion expended annually.



Uniform Guidance Implementation by OMB

- OMB published Uniform Guidance on December 26, 2013.
- OMB released FAQs on:
 - February 12, 2014
 - August 29, 2014
 - These FAQs have the full force and effect of the Uniform Guidance
- OMB conducted webinars on the Uniform Guidance on:
 - January 27, 2014
 - October 2, 2014
- OMB to issue consolidated government-wide implementation in December, 2014
- Visit cfo.gov/cofar/ for the latest information.



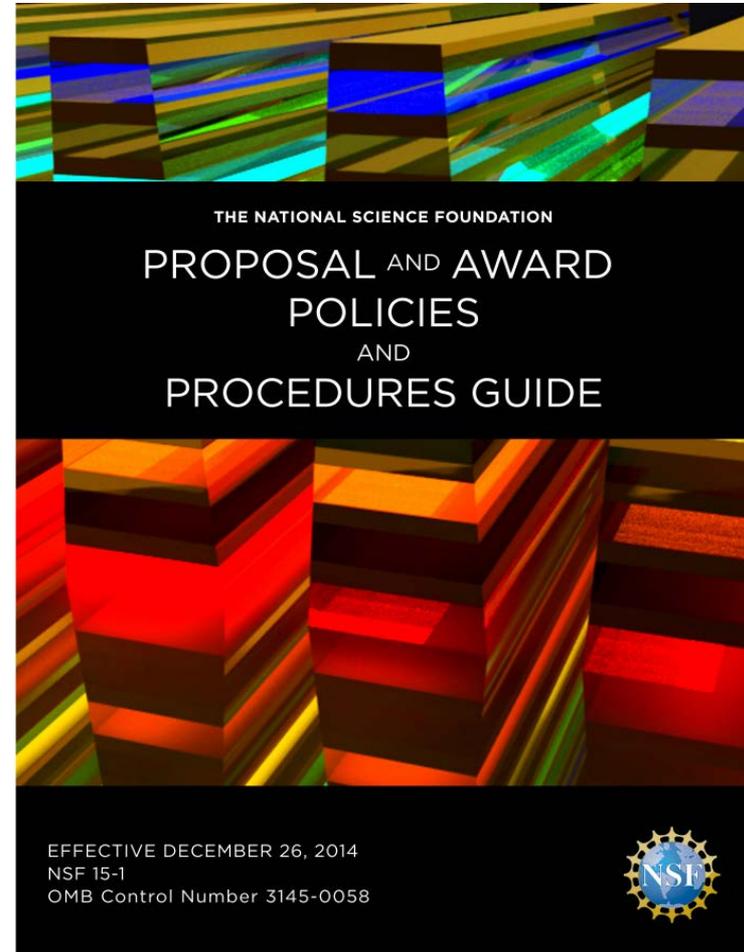
PAPPG – Uniform Guidance Federal Register Comments

- **NSF received OMB approval to implement Uniform Guidance via the PAPPG.**
- **Draft PAPPG released for public comment through *Federal Register*, May 9 - July 8, 2014**
- **54 responses from 18 different institutions/individuals**
- **27 regarding GPG; 18 regarding AAG (with one duplicated in both); two “other”; and seven “concur with COGR memo of 07/01/14”**



PAPPG – Upcoming Policy Changes

- **NSF
Implementation of
OMB's Uniform
Guidance**
- **Other Significant
Policy Changes**



PAPPG – Uniform Guidance Federal Register Comments

- **Common topics:**
 - **Inclement weather policy**
 - **subawards and subaward budgets**
 - **Indirect costs (and application of the 10% *de minimus* rate)**
 - **Grant closeout**
 - **Record retention and audit**
 - **Procurement**



PAPPG – Uniform Guidance Significant Changes to the GPG

- **Administrative and Clerical Salaries & Wages**
- **Travel**
- **Participant Support**
- **Materials and Supplies**
- **Subawards**
- **Indirect Costs**
- **Risk Management Framework**



PAPPG – Uniform Guidance Significant Changes to the AAG

- **AAG vs. 2 CFR § 200 – which takes precedence**
- **NSF Award Conditions**
- **Notifications and Requests**
- **Cost Sharing**
- **Financial Requirements/Payments**



PAPPG – Uniform Guidance Significant Changes to the AAG

- **Program Income**
- **Final Disbursement Reporting**
- **Financial Management, Property,
Procurement Management**
- **Suspension and Termination Procedures**



PAPPG – Other Significant Changes Grant Proposal Guide (GPG)

- **Special Exceptions to Deadline Date Policy
– Inclement Weather**
- **Format of the Proposal – Automated
Compliance checking**
- **Project Description – Broader Impacts**
- **Results from Prior NSF Support**
- **Budget Justification**
- **Ideas Lab**



PAPPG – Other Significant Changes Award Administration Guide (AAG)

- **Supplemental Support**
- **Prior Written Approvals**
- **Research Terms and Conditions**



Uniform Guidance: NSF Key Dates

- **Proposal Preparation: Effective immediately, all new announcements and solicitations will include the following language:**
 - **A revised version of the NSF Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 15-1), is effective for proposals submitted, or due, on or after December 26, 2014. The PAPPG is consistent with, and implements the new Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR § 200). NSF anticipates release of the PAPPG in the Fall of 2014. Please be advised that, depending on the specified due date, the guidelines contained in NSF 15-1 may apply to proposals submitted in response to this funding opportunity.**
- **All new awards and funding increments to existing awards will be subject to the Uniform Guidance effective December 26, 2014.**



Automated Compliance Checking

- **March 2013, NSF enforced the following GPG required proposal sections during proposal intake:** (**already being auto-compliance checked*)
 - *Project Summary**
 - Project Description
 - References Cited
 - Biographical Sketch(es)
 - Budget
 - Budget Justification
 - Current and Pending Support
 - Facilities, Equipment & Other Resources
 - Supplementary Documentation
 - *Data Management Plan **
 - *Postdoctoral Mentoring Plan (where applicable) **
- **Non-Compliance Findings:**
 - Triggered when the PI checks the proposal, forwards it to the SPO, and when the SPO submits to NSF
 - Error (hard stop) or Warning Message



Automated Compliance Checking

- **Auto-compliance checking implementation activities will continue in FY 2015:**
 - Solicitation-specific auto-compliance checking planning
 - Piloted a solicitation-specific set of compliance checks in April 2014
 - Identified best practices and ensured minimum impact on the research community



Automated Compliance Checking

- **Future GPG-specific auto-compliance checks**
 - Enforce page count rules for the following proposal sections:
 - Project Description
 - Budget Justification
 - Mentoring Plan
 - Data Management Plan
 - Budget Checks: implement duration and requested amount compliance checks
 - Example: maximum requested amount cannot exceed \$200,000 for a RAPID proposal
- **Funding Mechanism/Proposal Section auto-compliance checks, anticipated early FY2015:**
 - Enforce proposal sections depending on the funding mechanism type
 - Example: enforce a project description for a research grant



Research Performance Progress Report (RPPR) Update

- 68,000+ project reports submitted via Research.gov
- Continuous enhancements to improve user experience
 - View Project Reports (August 2014)
 - Video Tutorials
 - Standardized Error Messages
 - Pre-population



Award Cash Management Service (ACM\$)

- Program income reporting (effective March 2014)
- Preparing for NSF's new financial and accounting system
 - Financial services unavailable from **September 19 to October 13**
 - **Last date to submit drawdowns for awards was September 18**
- As of October 1, NSF began making all payments using System for Award Management (SAM) banking information



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)

