Nuts & Bolts of Award Management
May 21, 2013
W. Mae Powell
Grant and Agreement Specialist
Topics of Discussion

- NSF Award Management Philosophy
- Award Administration Roles
- Award Notification
- Award Revisions: Awardee approval vs. NSF approval
- Indirect Costs
- Cost sharing
- Participant Support
- Subawardees
- Termination & Disciplinary Actions
- Accessing Documents on the NSF Website
- Conclusion
Division of Grants and Agreements (DGA) as of FY 2012

- NSF has over 56,432 active awards

- Reviewed, negotiated and obligated funding for approximately 11,534 new awards last year

- DGA’s Role:
  - Responsible for monitoring the business practices of grantees
NSF Award Management Philosophy

- **NSF is an assistance agency**
  - Research carried out by award

- **Integrated Oversight Enterprise**
  - Program provides oversight of scientific progress
  - BFA provides oversight of compliance and business assistance

- **Office of Inspector General is responsible for Audits and Investigations**

- **End-to-end award management**
  - Risk-based review
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:**
- Obligates funds to carry out public purpose of support or stimulation
  - Award Letter to AOR (Office of Sponsored Research)
  - Award Notice entails - Research Terms and Conditions (RTCs), or Grant General Conditions (GC-1), any special terms and conditions

**Cooperative Agreements:**
- Also for public purpose; however, substantial involvement by the government is 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 notice or 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**
- **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**
  - Refer to Award & Administration Guide Exhibit II-1 for complete list
Exhibit II-1: GRANTEE NOTIFICATIONS TO AND REQUESTS FOR APPROVAL FROM THE NATIONAL SCIENCE FOUNDATION*

All notifications and requests for approval from the National Science Foundation must be submitted electronically via the NSF FastLane System at http://www.fastlane.nsf.gov. Questions related to the electronic processing of these notifications and requests should be forwarded to the FastLane 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>
</tr>
</thead>
<tbody>
<tr>
<td>Grantee Approved No-Cost Extension</td>
<td>I.D.3.c(i)</td>
</tr>
<tr>
<td>Significant Changes in Methods/Procedures</td>
<td>II.B.1.b</td>
</tr>
<tr>
<td>Significant Changes/Delays or Events of Unusual Interest</td>
<td>II.B.1.c</td>
</tr>
<tr>
<td>Short-Term Absence of the PI/PD or co-PI/co-PD</td>
<td>II.B.2.c</td>
</tr>
<tr>
<td>Amount of Federal funds is expected to exceed the grant by more than $5,000 or 5%</td>
<td>II.C.2.c</td>
</tr>
<tr>
<td>Cost Share $500K or more</td>
<td>II.D.5</td>
</tr>
<tr>
<td>Conflicts of Interest that cannot be satisfactorily managed, reduced or eliminated</td>
<td>IV.A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of Grantee Request</th>
<th>AAG</th>
<th>RTC</th>
<th>GC-1</th>
<th>Direct questions to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>First NSF Approved No-Cost Extension</td>
<td>I.D.3.c(ii)(a)</td>
<td>Art. 25</td>
<td>Art. 4</td>
<td>Program Office</td>
</tr>
<tr>
<td>Second NSF Approved No-Cost Extension</td>
<td>I.D.3.c(ii)(b)</td>
<td>Art. 25</td>
<td>Art. 4</td>
<td>Grants Office</td>
</tr>
<tr>
<td>Request for Supplemental Support</td>
<td>I.E.4</td>
<td>Art. 25</td>
<td>Art. 4</td>
<td>Program Office**</td>
</tr>
<tr>
<td>Change in Objective or Scope</td>
<td>II.B.1.a</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Program Office**</td>
</tr>
<tr>
<td>Long-Term Absence of the PI/PD or co-PI/co-PD</td>
<td>II.B.2.d</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Program Office**</td>
</tr>
<tr>
<td>Change in Person-Months Devoted to Project</td>
<td>II.B.2.e</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Grants Office, if necessary</td>
</tr>
<tr>
<td>Withdrawal of PI/PD or co-PI/co-PD</td>
<td>II.B.2.f</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Program Office</td>
</tr>
<tr>
<td>Substitute PI/PD or co-PI/co-PD</td>
<td>II.B.2.g</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Program Office</td>
</tr>
<tr>
<td>PI/PD or co-PI/co-PD Transfer from One Organization to Another</td>
<td>II.B.2.h</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Grants Office</td>
</tr>
<tr>
<td>Contracting or Transferring the Project Effort (Subawards)</td>
<td>II.B.3</td>
<td>Art. 25</td>
<td>Art. 8</td>
<td>Grants Office</td>
</tr>
<tr>
<td>Pre-award Costs in Excess of 90 Days</td>
<td>V.A.2.b</td>
<td>Art. 25</td>
<td>Art. 3</td>
<td>Grants Office</td>
</tr>
<tr>
<td>Reallocation of Funds Budgeted for Participant or Trainee Support Costs</td>
<td>V.B.8</td>
<td>Art. 27</td>
<td>Art. 2</td>
<td>Program Office</td>
</tr>
<tr>
<td>Rearrangements/Alterations in excess of $25,000</td>
<td>V.C.1</td>
<td>Art. 27</td>
<td>Art. 11</td>
<td>Grants Office</td>
</tr>
<tr>
<td>Adjustments to cost sharing commitments reflected on Line M of the approved NSF budget</td>
<td>II.D</td>
<td>Art. 23</td>
<td>Art. 22</td>
<td>Grants Office</td>
</tr>
</tbody>
</table>

Notes: *This listing of Notifications and Requests for Approval is not intended to be all-inclusive. **Final action by Grants Officer, when warranted Small Grants for Exploratory Research Awards are not eligible for grantee-approved no-cost extensions

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) or National Science Foundation (NSF)).

Please consult with your Office of Sponsored Programs for any questions.
Cost Sharing

- **Research Terms & Conditions & NSF Agency Specific**
  - Requirements (RTC-NSF)
    - Article 16, Cost Sharing or Matching
- **Cooperative Agreement (CA-FATC)**
  - Article 22, “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

- 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

- **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.
Participant Support Costs

- 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: GC-1, Article 7 OMB Circular A-21, J.17 and J.48
Subawards & Subrecipient Monitoring

**Subawards**
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
  - A-87, A-122, A-21, FAR
- Administrative requirements
- Statutory or regulatory requirements
  - COI, human subjects, drug-free workplace, CA-FATC Article 8
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.
  - The Foundation has other reasonable cause.
  - It is ordered by the Deputy Director under NSF’s Regulation on Research Misconduct (45 CFR &689).
Award Termination & Disciplinary Actions

• By NSF when (Continued):
  • NSF and the awardee mutually agree that termination would be in both parties’ best interest.
    • If NSF and the awardee cannot reach an agreement, NSF reserves the right to unilaterally terminate the grant.
  • By the awardee:
    • Via written notice to NSF
      • Should include the final balance
Potential NSF Oversight

- Programmatic Site Visits
- Division of Institution & Award Support (DIAS) contracted desk reviews
- DIAS Award Monitoring Business Assistance Program (AMBAP) site visits in conjunction with the Division of Grants Agreements (DGA)
- Division of Financial Management (DFM) contracted FFR (Federal Financial Reporting) reviews
- Office of Inspector General (OIG) audits
Risk Factors

- Award Amount
- New Grantee Status
- High $ amount to subawards
- Government Owned Equipment
- Participant Support
Keys to Success

Project/Award Specific Requirements

Read your award letter carefully! It may include:

- Funding restrictions
- Special reporting requirements
- Other special conditions
QUICK REFERENCE LINKS

  Proposal & Award Policies & Procedures Guide
  Division of Grants and Agreements
  Division of Financial Management
  Cost Analysis & Audit Resolution Branch
- [http://www.whitehouse.gov/omb/circulars_default](http://www.whitehouse.gov/omb/circulars_default)
  OMB Circulars

Financial Questions/Payment: 703-292-8280
ENG/CISE/OIIA Branch

Christopher Robey - ENG/CISE/OIIA - Branch Chief - (703) 292-4822  jrobery@nsf.gov

Larry Fuqua - CISE/OIIA Team Lead - (703) 292-4807  lfuqua@nsf.gov

- Deidre Coates - Grant and Agreement Specialist - (703) 292-4804  dcoates@nsf.gov
  - OCI - Office of Cyberinfrastructure
  - CNS - Division of Computer and Network Systems
  - OISE - Office of International Science and Engineering

- Willie Mae Powell - Grant and Agreement Specialist - (703) 292-4583  wpowell@nsf.gov
  - OIA - Office of Integrative Activities
  - EPSCoR - Experimental Program to Stimulate Competitive Research
  - CCF - Division of Computing and Communication Foundations
  - IIS - Division of Information and Intelligent Systems

- Denise Young - CISE/OCI/OISE/OIA - Grant Administrator - (703) 292-4837  doyoung@nsf.gov
NSF Friendly Reminder

ASK EARLY!

ASK OFTEN!

nsf.gov/staff
nsf.gov/staff/orglist.jsp