

# **NSF Policy Updates (Including Proposal & Award Policies & Procedures Guide (PAPPG; NSF 15-1))**

**EPSCoR PD/PA and Education, Outreach & Diversity  
Officers' Meeting  
Honolulu, Hawaii  
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**National Science Foundation**  
WHERE DISCOVERIES BEGIN

# Speaker

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# Topics

- *Proposal & Award Policies & Procedures Guide (PAPPG) Update*
  - Uniform Guidance Implementation
  - Other Significant Policy Changes
  - Automated Compliance Checking
- Revision of NSF Award Conditions to implement the Uniform Guidance

# Uniform 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.
- OMB published the Uniform Guidance in the Federal Register on December 26, 2013, and directed Federal Agencies to implement by December 26, 2014

# Uniform Guidance Implementation by OMB

- OMB published Uniform Guidance on December 26, 2013.
- OMB released FAQs on:
  - February 12, 2014
  - August 29, 2014
  - November 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 issued consolidated government-wide implementation on December 19, 2014
- Visit [cfo.gov/cofar/](http://cfo.gov/cofar/) for the latest information.

# NSF Implementation Strategy

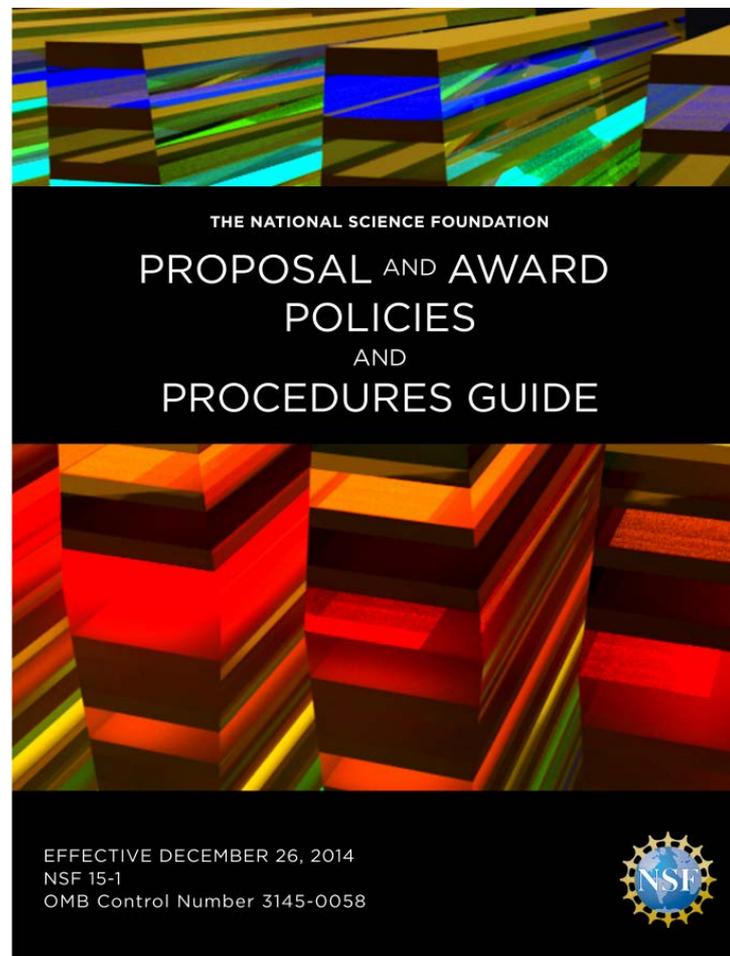
- Since the first issuance of OMB Circular A-110, NSF has always implemented the Circular requirements via policy rather than a regulation.
- 2 CFR § 200.106, Agency Implementation specifically permits OMB to approve use of alternative implementation strategies
- NSF requested, and, OMB approved NSF's use of a policy document to implement the Uniform Guidance
- NSF is the only agency which has been granted such authority.

# NSF's Implementation of the Uniform Guidance - Timeline

- 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
- NSF published the PAPPG on November 20<sup>th</sup>, with an effective date of December 26, 2014
- NSF published revised award conditions to implement the uniform guidance on December 20, 2014

# PAPPG – Policy Changes

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



# PAPPG – Uniform Guidance Federal Register Comments

- Common topics:
  - Subawards and Subaward budgets
  - Indirect cost Application (and application of a 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
- Indirect Costs
- Risk Management Framework

# PAPPG – Uniform Guidance Significant Changes to the AAG

- NSF Award Conditions
- Notifications and Requests
- Cost Sharing

# Uniform Guidance - NSF Deviation

- Non-Use of the Federal Financial Report Data Elements
  - Award Cash Management Service (ACM\$) and NSF Program Income Reporting Worksheet implemented as NSF's primary financial data collection mechanisms

# PAPPG – Other Significant Changes Grant Proposal Guide (GPG)

- Special Exceptions to Deadline Date Policy –  
Inclement Weather
- Budget Justification
- Ideas Lab
- Clarification on two month salaries
- Format of the Proposal – Automated  
Compliance Checking

# Automated Compliance Checking

- **GPG-specific auto-compliance checks, including Funding Mechanism/Proposal Section, anticipated January 26, 2015:**
  - 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
  - Enforce proposal sections depending on the funding mechanism type
    - Example: do not enforce inclusion of References Cited for a conference proposal

# Revision of the Grant General Conditions (GC-1), dated December 26, 2014 -- Highlights

- In the absence of Research Terms and Conditions, the GC-1 was modified to implement the new Uniform Guidance for use with all recipient types
  - Previously, the GC-1 was used with for-profit entities and State and local governments only
- Terminology modified throughout for consistency with the Uniform Guidance
- Prior approval requirements have been updated in Article 2

# Revision of the Grant General Conditions (GC-1), dated December 26, 2014 (Cont'd)

- Specific OMB FAQs have been highlighted throughout
- Participant support costs have been modified to require prior approval for additional categories of participant support costs not identified in approved budget
- Project Reporting Requirements have been clarified to specify when a report becomes “overdue”

# Revision of the Grant General Conditions (GC-1), dated December 26, 2014 (Cont'd)

- Expenditure reporting modified to establish the requirement that grantees must submit final financial disbursements no later than 120 days after the grant ends in the Award Cash Management Service.
  - This overrides the 90 days period identified in the Award & Administration Guide (AAG)
- Program Income Updated for consistency with AAG

# NSF – Uniform Guidance Implementation – Key Dates

- Effective for proposals submitted or due on or after December 26
- Effective for new awards and for funding amendments on existing awards made on or after December 26

**For More Information.....**

**Ask Early, Ask Often!**

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