

Award Management

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Ask Early, Ask Often!

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NSF Award Management Philosophy

- Assistance Agency
- Research Carried Out by Awardee
- Integrated Oversight Enterprise:
 - Program Oversight of Scientific Progress
 - BFA Oversight of Compliance and Business Assistance
- Audit Responsibility Reside with OIG
- End to End Award Management
- Risk Based Review



Award Administration – Relevant Roles of Awardee & NSF

■ Awardee Role

- Awardee has full responsibility for the conduct of project or activity and for adherence to the award conditions
- Awardee agrees to comply with the applicable Federal requirements and for the prudent management of all expenditures and actions
- Expenditures must be allowable, allocable, and reasonable



Award Administration – Relevant Roles of Awardee & NSF

■ Awardee Role (Continued)

All actions must also be:

- Consistent with award terms and conditions;
- Consistent with NSF and awardee policies;
- Represent effective utilization of resources; and
- Do not constitute a significant project change.

■ NSF Role

- Minimal monitoring (except for Cooperative Agreements)



Types of Awards

- Grants & Cooperative Agreements
 - Relationship is of assistance
 - Principal purpose is to accomplish a public purpose of support or stimulation
- Contracts
 - Relationship is one of procurement
 - Principal purpose is for the direct benefit or use of the Federal government



The NSF Award

■ Grants

- Award Notice, Research Terms & Conditions, Grant General Conditions (GC-1), occasional special conditions, and other documents incorporated by reference
- Electronic dissemination of Award Notice to AOR
- Awardee Distribution of Terms & Conditions
- Also available electronically via FastLane

■ Cooperative Agreements

- Financial & Administrative Terms and Conditions
- Programmatic Terms and Conditions



What are the Research Terms & Conditions?

- A revised set of terms and conditions that implement the OMB administrative procedures contained in 2 CFR Part 215 (OMB Circular A-110)
- Originally developed for use in the Federal Demonstration Partnership in July, 2000.
- Intended to be a “model” implementation of OMB Circular A-110.



What are the Research Terms & Conditions? (Continued)

- These revised conditions:
 - Are not considered by OMB to make substantive changes to the provisions of A-110 (2 CFR Part 215)
 - Incorporate sections from A-110 verbatim, where necessary
 - Provide clarifying or supplemental language, where appropriate
 - Indicate agency action, when necessary.
- Incorporate by reference a matrix of relevant grant-related statutes and regulations – “National Policy Requirements”.



What are the Research Terms & Conditions? (Continued)

- Incorporate by reference a document that identifies, by agency, which guidance applies to a specific types of subrecipients.
- Are accompanied by a prior approval matrix that summarizes all participating agencies prior approval requirements.
- Are also accompanied by a set of agency specific requirements.



Please Be Aware....

- Cooperative agreements have added conditions due to substantial involvement of NSF
 - Be aware that there is generally more reporting and oversight required for a cooperative agreement than a grant
 - There should be ongoing dialogue with the cognizant Program Officer to fully understand the conditions of this type of award



Terms and Conditions – By Organization Type

- Research Terms and Conditions & NSF Agency Specific Requirements
 - US Academic Institutions of Higher Education
 - Other Non-profit organizations
 - Hospitals
- Grant General Conditions (GC-1)
 - For profit organizations (other than Small Business Innovation Research awardees)
 - State and local Governments



Awardee-Approved Notifications to NSF

- Single 12 Month No Cost Extension
 - This is not to be used for awards that contain a zero balance
 - Does not include Cooperative Agreements
- Significant Changes in Methods & Procedures*
- Unusual Occurrences*
- Short Term Absences (less than 90 days)*
- Conflict of Interest Not handled by Awardee

* Note that these three items are notifications that are sent directly from PI to NSF, with copy to the AOR.



Awardee-Authorized Approvals

- Virtually All Budget Changes are PI's Prerogative – Subject to Organizational Approval
 - Note: Unless such changes constitute a change in objective or scope
 - Exception for Participant Support
- 90 Day Pre-Award Costs



NSF Prior Approval Requirements (Technically Related)

- Change in Objective or Scope
- Change in Expiration Date (no-cost extension)
- PI/co-PI Changes:
 - Withdrawal or Change of PI/co-PI
 - Long-term Absence: Defined as 90 days or more
 - Reduction in PI Level of Effort: Defined as a reduction of 25% or more in time devoted to project



NSF Prior Approval Requirements (Financially Related)

- Transferring the Project Effort via:
 - Subaward
 - 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



Notifications & Requests | MAIN ▶

Organization: National Science Foundation

Forwarded by PI

Prepared by SPO

Submitted to NSF

Prepare a New Notification or Request for Award #: 0707551

Award Amount: \$0.00
Expiration Date: 12/31/2011
Division: DIVISION OF INFORMATION SYSTEMS
Award Title: PRS 11/18/06 Release Functional Verification 15
Awardee Organization: National Science Foundation
PI/PD: Alphaman, Alan

Select the Notification or Request Type:

GRANTEE NOTIFICATION TYPES	Topic Guidance	GRANTEE REQUEST TYPES (Requires NSF Approval)	Topic Guidance
<input type="radio"/> Anticipated Residual Funds in excess of \$5,000 or 5%	AAG	<input type="radio"/> Addition of SubAward	AAG
<input type="radio"/> Grantee Approved No Cost Extension	AAG	<input type="radio"/> Withdrawal of PI/Co-PI	AAG
<input type="radio"/> Significant Changes/Delays or Events of Unusual Interest	AAG	<input type="radio"/> Long-Term Absence of the PI/PD (Over Three Months)	AAG
<input type="radio"/> Cost Sharing Equal To or Greater Than \$500,000	AAG	<input type="radio"/> NSF Approved No-Cost Extension	AAG
<input type="radio"/> Conflicts of Interests	AAG	<input type="radio"/> PI Transfer	AAG
<input type="radio"/> Significant Changes in Methods/Procedures	AAG	<input type="radio"/> Pre-award Costs in Excess of 90 Days	AAG
<input type="radio"/> Short-Term Absence of the PI/PD (Up to Three Months)	AAG	<input type="radio"/> Rearrangement/Alteration \$25,000 or over (Follow these links for more information on Non-FDP Organizations or FDP Organizations . They will open a PDF file in new window.)	AAG
		<input type="radio"/> Change PI and Add/Change Co-PI	AAG
		<input type="radio"/> Significant Change in Person-Months Devoted to Project	AAG
		<input type="radio"/> Changes in Objective or Scope	AAG
		<input type="radio"/> Reallocation of Funds Budgeted for Participant or Trainee Support Costs	AAG

*Topic Guidance is provided through Grant Proposal Guide (GPG) and Award & Administration Guide (AAG) references.

Prepare Cancel

Publication & Data Sharing Requirements

- Acknowledgement of Support
- Disclaimer
- Copyrightable Material
- Sharing of Data



Data Sharing by NSF Awardees

- Data access:
 - Helps promote scientific research by permitting other qualified scientists to replicate results;
 - To reinterpret data or extend research methods to new areas;
 - Thus build upon the existing base of scientific knowledge



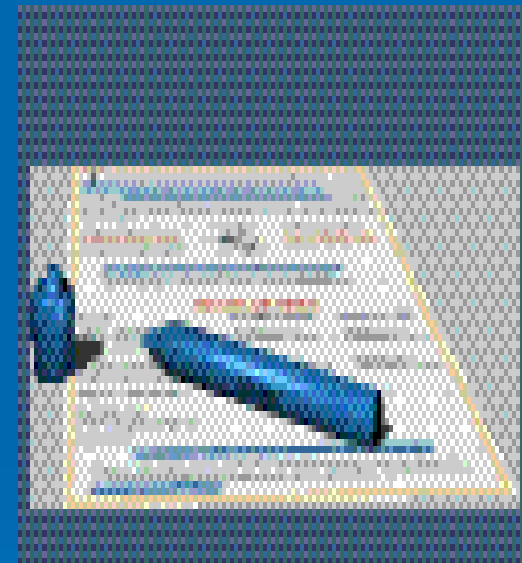
Implementing Data Sharing

- NSF Grant Conditions set the basic standards for expected data sharing by NSF awardees
 - NSF Programs may implement this sharing policy in ways appropriate to the scientific field and to specific circumstances
 - Specific data sharing policies – including data “pooling” – are particularly appropriate where for example, research transcends national boundaries, and/or where “pooled” data promotes discovery of patterns or interrelationships that would not be evident from individual research data. Examples include: OPP, GEO/Ocean Sciences, and SBE



Other Administrative Requirements

- Use of Consultants
- Equipment
- Program Income
- Travel



Travel Requirements

- Expenses for transportation, lodging, subsistence and related items incurred by project personnel and by outside consultants employed on the project who are in travel status on business related to an NSF-supported project are allowable as prescribed in the governing cost principles.
- Except as provided in the governing cost principles, the difference between economy airfare and a higher-class airfare is unallowable. A train, bus or other surface carrier may be used in lieu of, or as a supplement to, air travel at the lowest first-class rate by the transportation facility used. If such travel, however, could have been performed by air, the allowance will not normally exceed that for jet economy airfare.



Use of U.S. Flag Air Carriers

- Any air transportation to, from, between or within a country other than the U.S. of persons or property, the expense of which will be assisted by NSF funding, must be performed by, or under a code-sharing arrangement with, a U.S.-Flag air carrier if service provided by such a carrier is “available.”
 - Deviations from the U.S-Flag air carrier policy are described in detail in the Award and Administration Guide at:
http://www.nsf.gov/pubs/policydocs/papp/aaq_6.jsp#VI_G1b



Use of Foreign-flag Carriers

There are limited circumstances under which use of a foreign-flag air carrier is permissible:

1. *Airline "Open Skies" Agreements:* A foreign flag air carrier may be used if the transportation is provided under an air transportation agreement between the United States and a foreign government, which the Department of Transportation has determined meets the requirements of the Fly America Act. For information on other "open skies" agreements in which the United States has entered, please refer to GSA's website.
2. *Involuntary Rerouting:* Travel on a foreign-flag carrier is permitted if a U.S.-flag air carrier involuntarily reroutes the traveler via a foreign-flag air carrier, notwithstanding the availability of alternative U.S.-flag air carrier service.

<http://apps.fas.gsa.gov/citypairs/search/>



Other Statutory & Regulatory Requirements

- Nondiscrimination
- Animal Welfare
- Recombinant DNA Molecules
- Clean Air and Water
- Human Subjects
- Investigator Financial Disclosure
- Debarment and Suspension

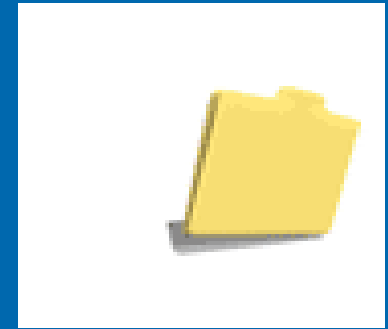


Award Transfers

- The award is made to the university
 - Organization has the discretion of appointing a substitute PI or terminating the award
- If willing to transfer the award to another university be sure to:
 - Final Federal Financial Report must be submitted
 - Accurately determine what funds are to be transferred
 - Funds transferred cannot be changed
 - NSF cannot intervene or redo a transfer after it is made
- Consider making a subaward rather than transferring the whole award



Technical Reports



■ Required Technical Reports

• Annual Project Reports

- Due No Later Than 90 days prior to Expiration Date
- Required for ALL Standard & Continuing Grants and Cooperative Agreements

• Final Project Reports

- Due Within 90-days after the Expiration of an Award
- Required for ALL Standard & Continuing Grants and Cooperative Agreements
- Required for Individual Research Fellowships per Program Solicitation



Technical Reports

■ Report Contents Include:

- Participants
- Activities & Findings
- Publications & Products
- Contributions
- Special Requirements

■ Technical Monitoring

- Program Officer Site Visits
- Participation in required Outreach activities



Interim Project Reports (Not required)

- Significant Events
- Per special conditions of the award
- No submission/preparation after grant is closed
- No Business Process Associated, Information only
- No Publication Citations



Project Report Tracking & Notification System



■ Projects Report System Edits

- Provides set reporting reports – annual and final divisible by 12 months
- Tracking System includes: periods, status, and due/overdue dates
- External & Internal Communities Ability to Track On Line
- Notification reminders automatic to PIs and SPOs
- Award Notices – URL with pass through to Project Report Module on FastLane



NSF Back-office Edits

- No future funding if overdue annual/final reports
- No PI changes or no cost extensions
- No changes after final report approval by PO
- PO can return final report up to 30 days after approval date
- Report status can't be re-set for annual reports



Project Reporting Facts

- Extending the grant period does not relieve PIs of reporting requirements
- In the last year of a grant, the PI owes only a final report
- Final Report submission means final action – no further activity
- If the PI leaves prior to submitting a required report, the organization must still fulfill reporting obligations
- The organization is responsible for submission of required reports; not the PI
- Reports cannot be submitted prior to period start date
- No publication citations after final report approved, grant closed



Audit Requirements



- Grant General Conditions (GC-1)
 - Article 23
- Research Terms & Conditions (RTC)
 - Article 26
- Award & Administration Guide (AAG)
 - Chapter II.F
- NSF Office of Inspector General Activities



And when things really go wrong...

- 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;
 - ordered by the Deputy Director under NSF's Regulation on Research Misconduct (45 CFR §689);



And when things really go wrong...

- By NSF (Continued)
 - NSF and the awardee by mutual agreement (if NSF and the awardee cannot reach an agreement, NSF reserves the right to unilaterally terminate the grant); or
- By the awardee on written notice to NSF



Accessing Documents on the NSF Website

- <http://www.nsf.gov>
- Proposal Preparation
 - Grant Proposal Guide
 - Grants.gov Application Guide
 - Frequently Asked Questions
- Award Administration
 - Award & Administration Guide
 - Grant & Agreement Conditions
 - Frequently Asked Questions



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www.nsf.gov

