'UG'
New Rules and changes at NSF/NIH

'UG' - Uniform Guidance
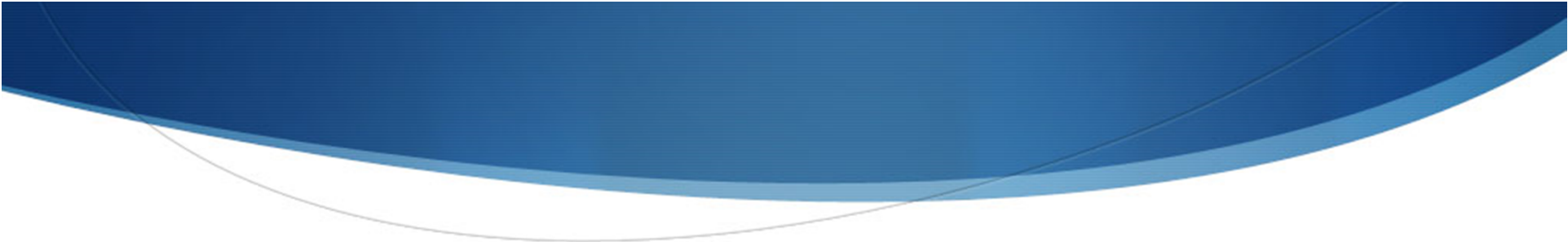
➢ Goes into effect for all federal awards after 12/26/14 – this includes any NEW increments for current awards – info at: https://cfo.gov/cofar/

➢ Replaces 8 different circulars and covers all federal agencies

➢ Makes the rules the same for all types of institutions

➢ Each federal agency may interpret them differently

The 'Good' News

➤ Voluntary Cost-sharing (matching) may NOT be considered during review unless specifically called for in the solicitation.

➤ Computing devices are generally considered "Supplies" and can therefore be directly charged to federally sponsored projects as long as they are essential to the project and allocable. Any computing device costing more than $5,000 should still be treated as Equipment.

➤ Costs of publication or sharing of research results may be charged to the grant after the end of grant but before close out (within the 90 day window).

more changes…

➢ Allows for costs of advertising for program outreach.

➢ Administrative salary costs now allowable under certain circumstances – must be directly allocable to award and identified by name and role in proposal/award budget. Can not be included in indirects.

➢ Federal government can only disallow costs within 3 years of final reporting. Note: this is the same period required for record retention.

♦ The Uniform Guidance recognizes that a PI can be absent from campus and remain engaged in the project. Prior approval from federal awarding agencies must be obtained for the following program or budget-related reasons:

1. change in scope or objective of the project or change in a key person identified in the grant application

2. disengagement from the project for more than 3 months

3. a 25% reduction in committed time

The 'Not So Good' News

➢ $5,000 is the MAXIMUM allowable residual inventory for unused supplies at the end of a grant (if more exists, grant should be reimbursed). Extra care should be taken when purchasing supplies in the last 90 days of a grant!

➢ Expressly prohibits the earning or keeping of profit from any federal assistance unless authorized in award – this includes any registration fees or funds collected from conferences/events.

➢ Individual memberships are not an allowable direct charge on a federally sponsored project.
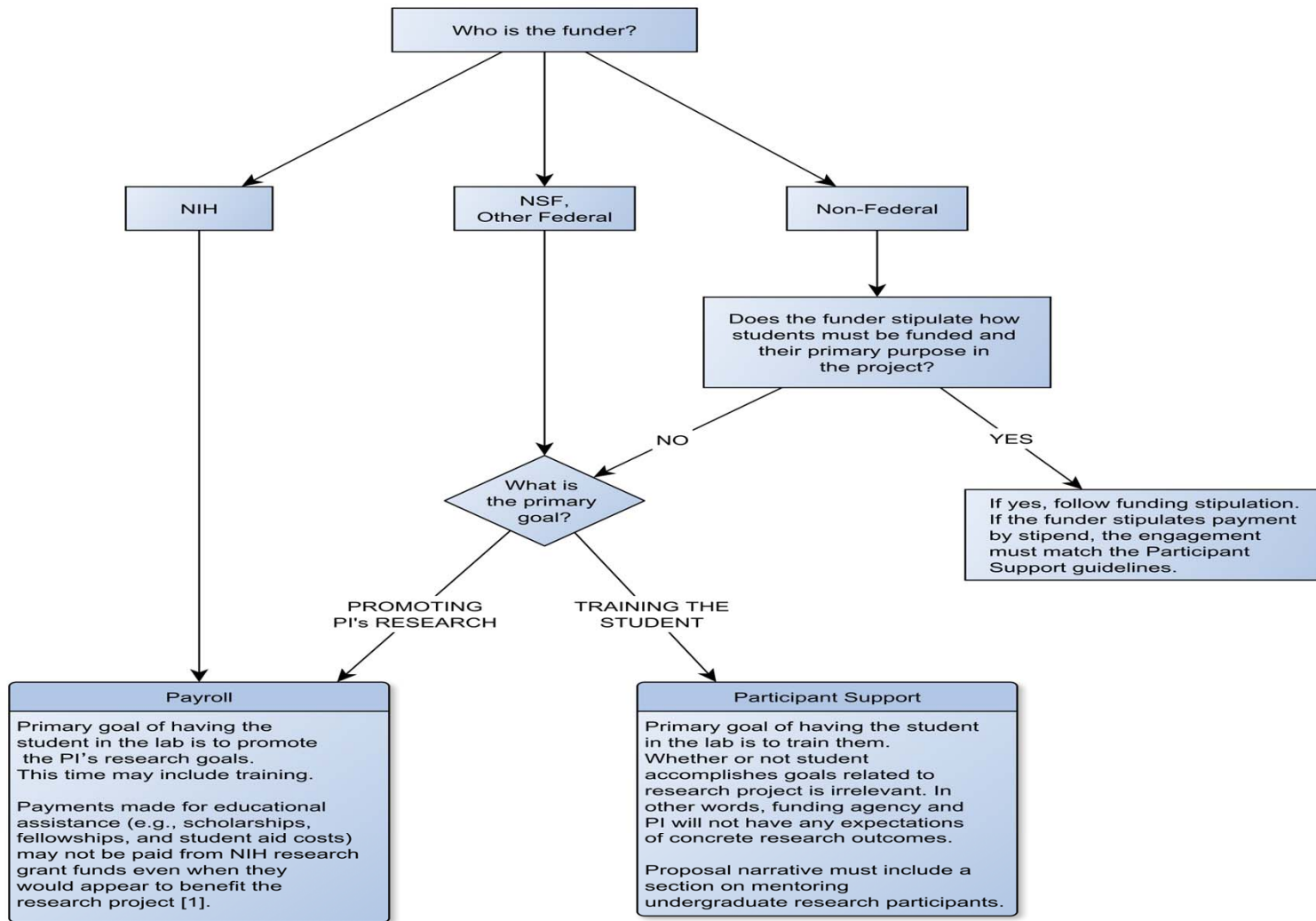
The 'Subaward' News

➢ New emphasis on subaward risk management. Performance may be tied to payment.

➢ Subawarding to smaller institutions/non-profits will be riskier for MHC. If you want to subaward to an institution that is not another higher education institution be prepared to start the process very early in order to get it approved.

➢ All subaward budgets must contain subawardee's negotiated indirect rate (or 10% if they have none).

Participant Support News

- In the past, "participant support costs" was a budget line item normally found only in NSF-funded projects. Under the Uniform Guidance (200.456) other federal sponsors also may allow PIs to budget and charge for participant support costs. Participant Support Costs include: stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. **Participant support costs are not routinely allowed on research projects but can be charged if the project includes an education or outreach component and the federal agency approves such costs**.

Note: These costs must be explicitly listed in the proposal budget or approved by the funding agency after the award has been made.

Budgeting Students in Grant Proposals

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┌─────────────────────┐
│   Who is the funder? │
└─────────────────────┘
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NIH

NSF, Other Federal

Non-Federal

Does the funder stipulate how students must be funded and their primary purpose in the project?

NO

YES

What is the primary goal?

If yes, follow funding stipulation. If the funder stipulates payment by stipend, the engagement must match the Participant Support guidelines.

PROMOTING PI's RESEARCH

TRAINING THE STUDENT

Payroll

Primary goal of having the student in the lab is to promote the PI's research goals.
This time may include training.

Payments made for educational assistance (e.g., scholarships, fellowships, and student aid costs) may not be paid from NIH research grant funds even when they would appear to benefit the research project [1].

Participant Support

Primary goal of having the student in the lab is to train them. Whether or not student accomplishes goals related to research project is irrelevant. In other words, funding agency and PI will not have any expectations of concrete research outcomes.

Proposal narrative must include a section on mentoring undergraduate research participants.

[1] Review the NIH Grants Policy Statement: http://grants.nih.gov/grants/policy/nihgps_2012/nihgps_ch7.htm

NOTE: A student must always be paid as budgeted in the original proposal.
Participant Support funds may not be used for any other budget category without prior approval in writing by a grants officer.
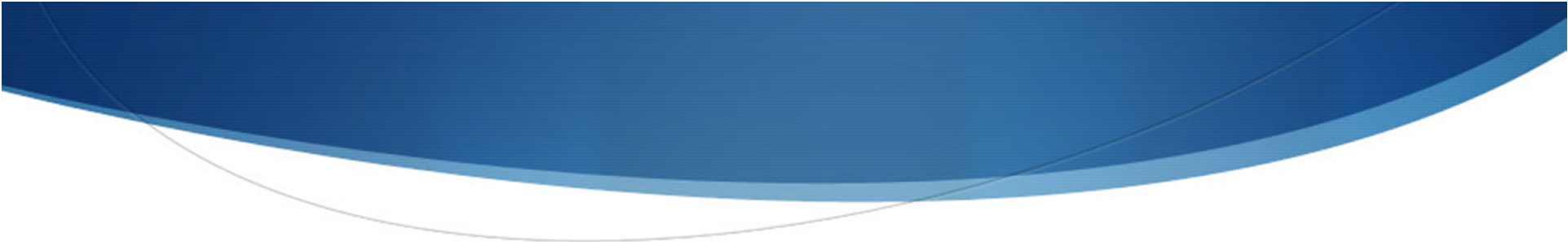
Updated 12/9/2014

The 'Bad' News

The UG provides detailed and prescriptive methods by which institutions should procure goods and services under a federal award **costing $3k or more**. This includes stricter requirements for sole-source purchases.

NOTE: One year grace period to implement – look for new Purchasing procedures to go into place by 12/26/2015
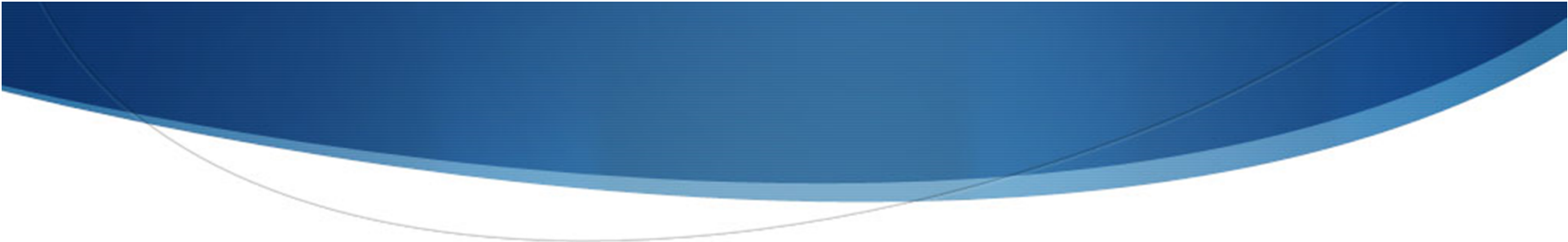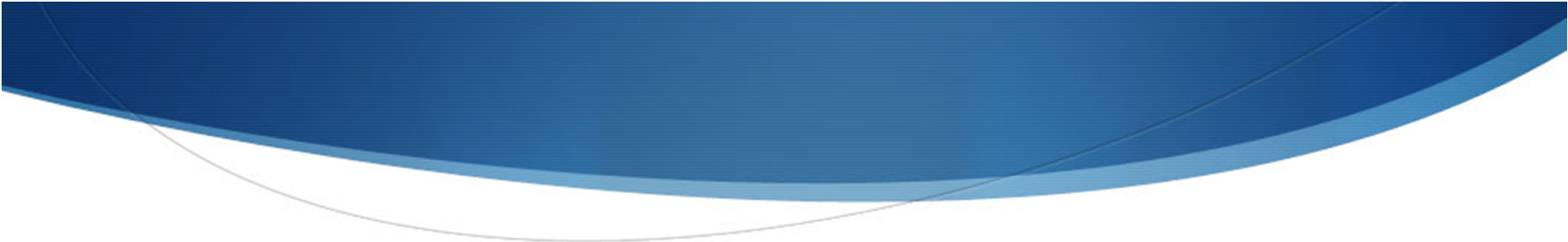
Changes at NSF

➢ New PAPPG published 12/26/14 – effective for all proposals submitted/all funds awarded after this date including new increments on existing awards http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001

➢ **Participant Support**, has been clarified to reflect that any participant support costs must be justified in the budget justification, and such costs will be closely scrutinized by NSF. Funds provided for participant support may not be used for other categories of expense without specific prior NSF written approval. Can't rebudget within Participant Support categories without prior approval.

➢ **Materials and Supplies**, includes coverage on costs of computing devices (under $5k). The charging of computing devices as a direct cost is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of the NSF award.

➢ **Travel**, has been revised to state that **<u>all travel</u>** (both domestic and foreign) must now be justified. The definition of what constitutes domestic travel has been revised. All travel to Canada and Mexico now considered foreign.

What's new for proposals?

➢ **Project Description**, has been updated to reflect that the project description must now contain, as a separate section within the narrative, a section labeled "Broader Impacts of the Proposed Work".

➢ **Results from Prior NSF Support**, has been clarified to state that the listing of publications resulting from an NSF award must provide a complete bibliographic citation for each publication in either the Results from Prior NSF Support section or in the References Cited section of the proposal. If multiple PIs in proposal – cite 1 prior result per PI only.

➢ **Budget and Budget Justification**, must be no more than three pages. For proposals that contain a subaward(s), each subawardee must include a separate budget justification of no more than three pages.

➢ **Biographical Sketch(es)**, New information is being requested: Professional Preparation. The *location* of undergraduate, graduate and postdoctoral institutions must be provided. Total number of collaborators and co-editors, and graduate advisors and postdoctoral sponsors, must be identified in the appropriate areas in the Collaborators & Other Affiliations section.

➢ **Special Information and Supplementary Documentation**, clarifies the use of letters of collaboration (formerly referred to as letters of commitment). Such letters should be limited to stating the intent to collaborate and should not contain endorsements or evaluation of the proposed project. Proposals that are not consistent with the instructions in this section will be returned without review.

➢ **Proposals for Conferences**, has been modified to specify that NSF funds are not to be spent for meals and coffee breaks for intramural meetings of an organization or any of its components as a direct cost.

Grantee Notifications: three new requests that require NSF approval will be added to fastlane, including:

1. salaries of administrative or clerical staff,

2. travel costs for dependents*, and

3. additional categories of participant support costs

*(c)(1) Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences is allowable provided that: (i) The costs are a direct result of the individual's travel for the Federal award; (ii) The costs are consistent with the non-Federal entity's documented travel policy for all entity travel; and (iii) Are only temporary during the travel period. (2) Travel costs for dependents are unallowable, except for travel of duration of six months or more with prior approval of the Federal awarding agency. See also § 200.432 Conferences.

Notifications & Requests | MAIN ▶

Organization: Mount Holyoke College

| Forwarded by PI | Prepared by SPO | Submitted to NSF |

Prepare a New Notification or Request for Award #:

Award Amount: $

Expiration Date:

Division:

Award Title:

Awardee Organization: Mount Holyoke College

PI/PD:

Select the Notification or Request Type:

GRANTEE NOTIFICATION TYPES	Topic Guidance
○ Grantee Approved No Cost Extension	AAG
○ Anticipated Residual Funds in excess of $5,000 or 5%	AAG
○ Short-Term Absence of the PI/PD (Up to Three Months)	AAG
○ Significant Changes/Delays or Events of Unusual Interest	AAG
○ Significant Changes in Methods/Procedures	AAG
○ Cost Sharing Equal To or Greater Than $500,000	AAG
○ Conflicts Of Interest	AAG

GRANTEE REQUEST TYPES (Requires NSF Approval)	Topic Guidance
○ Withdrawal of PI/Co-PI	AAG
○ Pre-award Costs in Excess of 90 Days	AAG
○ Reallocation of Funds Budgeted for Participant or Trainee Support Costs	AAG
○ 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
○ NSF Approved No-Cost Extension	AAG
○ Changes in Objective or Scope	AAG
○ Long-Term Absence of the PI/PD (Over Three Months)	AAG
○ Addition of SubAward	AAG
○ Significant Change in Person-Months Devoted to Project	AAG
○ PI Transfer	AAG
○ Change PI and Add/Change Co-PI	AAG

*Topic Guidance is provided through the Award & Administration Guide (AAG) reference.

Prepare   Cancel

NIH

➢ Awaiting publication on final Uniform Guidance

➢ New biosketch format suggested for use January 2015, and required starting in May 2015: http://grants.nih.gov/grants/guide/notice-files/NOT-OD-15-032.html

➢ 2015 NIH Regional Seminar in Baltimore, May 6-8
This two-day seminar, with an optional third day of pre-seminar workshops, is ideal for anyone in the extramural research community who is new to working with NIH grants, including administrators, new and early stage investigators, and grant writers