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

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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/ 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 20th, 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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