Sponsored Program Administrators Meeting

July 29, 2020
Did you complete all the required steps for processing your manuscript acceptance for publication? Due to the COVID-19 pandemic, NIHMS is experiencing some delays in the manuscript processing pipeline. Manuscript deposit via NIHMS is a multi-step process that currently takes approximately 4 to 6 weeks following initial approval of a complete submission. Processing times may vary depending on Reviewer responsiveness and the volume of submissions during a given period.
NSF Award Terms and Conditions

New terms and conditions effective for all new awards and funding amendments received on or after October 5, 2020

Significant Change

Post-Award Disclosure of Current Support and In-Kind Contribution Information

New article that establishes the requirement for UConn to notify NSF of any current support of in-kind contribution that was current at the time of proposal submission not disclosed in the proposal within 30 calendar days of identifying the undisclosed information.

Notify SPS immediately if you discover the PI or Co-PI did not disclose properly.

Make sure faculty complete this section of the IPR and are aware that they certify that current and pending support information is complete.
Clarifications and Other Changes

Indirect Costs

Clarifies NSF expectation that the institution must charge the F&A rate in effect at the time the award is received.

Note: this was a finding for UConn in the NSF Audit
Expenditures on Sponsored Awards – New Guidance

Copier Charges
Cost associated with routine copying and printing, such as photocopying a journal article, or assigning individual lab team members a personal copy card are generally considered indirect charges and are unallowable as a direct charge on a sponsored award.

Copy charges may be an appropriate direct charge in cases when all of the following criteria are met:

- The copy expenses associated with a project are extraordinary (non-routine)
- The copy expenses are an integral part of the specific tasks associated with the sponsored award and are separately tracked
Membership, Dues and Professional Activity Expenses

- Dues and memberships in professional organizations are normally charged as F&A costs because their purpose is more general in nature (i.e., furthering a PI’s knowledge in his/her field) and direct benefit of these costs cannot be assigned, with a high degree of specificity, to an individual research project.

- Membership may be charged if it is required for conference attendance where the researcher is presenting his or her research or is obtaining, circulating, or distributing information to advance the performance of the project.

**Note:** The membership fee is also allowable as a direct cost to the project if it reduces the overall cost of attending the conference.
Postage and Express Delivery (§200.473)

- Routine postage or express mailing expenses are generally treated as F&A costs and therefore should not be charged as a direct cost on sponsored projects.

- In cases where the cost represents a non-routine postage charge required for a specific project, and that cost can be separately tracked, the cost may be allowable as a direct expense.

Examples of shipping and postage expenses that may be charged as direct costs:
  - Shipping specimens to a lab facility for processing
  - Postage for surveys
  - Shipping model organisms
  - Shipping research presentation materials for a conference when the benefit associated with conference attendance and presentation can also be directly assigned to the project
NSF Audit: By the Numbers

- $63M in expenditures supporting 401 awards over a three year period
- 125 transactions ($1.7M) selected for testing
Finding 1: Expenses Not Appropriately Allocated to NSF Awards

- $39,009 in questioned costs
  - Costs for services that occurred outside the period of performance
  - Costs for travel for a collaborator who did not work 100% on the NSF award
  - Publication costs allocated to the wrong award

- UConn Response
  - Federal Cost Principles Training
  - Enhanced FIT training
  - Sponsored Award Closeout Policy
  - Guidance on Scholarly Publication Costs
  - Guidance on Technical Reporting
  - Governing and Cost Accounting Standards
Finding 2: Expressly Unallowable Expenses Charged to NSF Awards

- $31,095 in questioned costs
  - Costs for catering that was not for working meals or otherwise did not follow NSF requirements for allowable catering or food costs
  - Travel costs outside of the conference or collaboration for the NSF award
  - Lodging expenses for “no show” charges and early departure charges
  - Business class flight
  - Sales tax

- UConn Response
  - New travel policy
  - Guidance on Expenditures
Finding 3: Inappropriate Use of Funds Provided for Participant Support

- $3,184 in questioned costs
  - Speaker costs
  - PI travel costs

UConn Response
- Trainings and information provided at SPA meetings

Finding 4: Fringe Benefits Not Appropriately Applied to Payroll Charged in Different Fiscal Years

- $1,851 in questioned costs
- Late payroll processing

UConn Response
- SPS is partnering with Payroll to enhance controls for late payrolls
Finding 5: Incorrect Application of Proposed Indirect Cost Rates
• Using the rate in place at time of proposal as opposed to time of award
• UConn Response
  • Changed process so awards are set up at current rate (not the proposed rate)

Finding 6: Travel Comparisons Not Appropriately Performed
• No documentation for travel that had a personal component
• UConn Response
  • Concur includes a question about personal travel with information about required documentation
Finding 7: Cost Transfer Documentation Not Appropriately Maintained
• Cost transfer forms were not on file (isolated incident)
• UConn Response
  • Internal SPS training provided

Finding 8: Stipends Not Appropriately Provided to Noyce Scholars
• Funding provided as a scholarship as opposed to a stipend
• UConn Response
  • Process changed to provide funds as a stipend
Finding 9: Program Income Not Appropriately Used

• Federal funds were used before program income funds
• UConn Response
  • Training provided at SPA
Beginning Saturday, July 25, 2020, the use of ASSIST for the submission of administrative supplements will be expanded. This release builds on the previous enhancements to ASSIST, outlined in ASSIST Has Been Streamlined to Support Easier Initiation and Submission of Administrative Supplements from April 7, 2020.

As of this date, there will be three methods for initiating an administrative supplement through eRA systems:

- Initiate in ASSIST, enter the Funding Opportunity Announcement (FOA) for an administrative supplement and enter information manually
- Initiate in ASSIST and after entering the Federal ID number of the parent grant award, some of the information from the parent award is prepopulated
Regardless of the method selected, administrative supplements will be submitted electronically through Grants.gov.

Users still have the option to submit administrative supplements via Grants.gov’s Workspace. Paper submissions and the previous “streamlined” process within eRA Commons that permitted administrative supplement requests to be submitted directly to the awarding agency without having to go through Grants.gov, will no longer be accepted.

There are numerous advantages with using this method that are further outlined in the announcement.
COVID-19 Contingency Plans in Proposals

• NIH grant applications should NOT include contingency plans that would outline steps needed to recover from temporary, emergency situations, or institutional return-to-the-workplace plans, resulting from the COVID-19 pandemic.

• Contingency plans will not be considered in peer review but, if needed, COVID-19 contingency plans will be requested and carefully considered by NIH staff before funding.

• This Notice provides guidance for investigators and institutions preparing NIH grant applications for the May 2021 Council round, beginning with applications submitted for the September 25, 2020 due date.

• Reviewers will continue to receive instruction to assume that temporary, emergency problems arising from the COVID-19 pandemic will be resolved and complications related to COVID-19 should not affect their scores.
5 Essential Grants.gov Resources for New Federal Grant Applicants

• When you apply for a federal grant on Grants.gov, help is always just a click away – no matter what screen you are on you can click a blue help icon which opens a new window with relevant articles. New applicants have several other help-related resources that they will want to bookmark for quick and easy access.
The Grants.gov YouTube Channel has over 50 up-to-date videos that walk users through the steps to search for opportunities on Grants.gov, create a workspace, add applicant team members to the workspace, complete application forms, and various other assistance tools. Most videos are under three minutes and can be easily shared with anyone.
The Grants.gov Roles & Privileges resource page contain explanations of each role and privilege that can be assigned to a user. Use this resource as a reference, for example: when you’re unsure what role gives a team member the ability to submit a completed application
Learn Grants

• The Grants.gov Learn Grants section presents new applicants with a high-level overview of the Federal Grants world. It can be intimidating to approach your first application deadline, or begin a keyword search for new federal funding for your organization, therefore Learn Grants contains everything from an overview of the application lifecycle, to profiles of federal grant-making agencies, a glossary of key terminology, and other tools that will help new applicants navigate the federal financial assistance application process.
Uniform Guidance: §200.463 Recruiting costs - (d) Visa Costs

(d) Short-term, travel visa costs (as opposed to longer-term, immigration visas) are generally allowable expenses that may be proposed as a direct cost. Since short-term visas are issued for a specific period and purpose, they can be clearly identified as directly connected to work performed on a Federal award. For these costs to be directly charged to a Federal award, they must:

(1) Be critical and necessary for the conduct of the project;

(2) Be allowable under the applicable cost principles;

(3) Be consistent with the non-Federal entity's cost accounting practices and non-Federal entity policy; and

(4) Meet the definition of “direct cost” as described in the applicable cost principles.
NIH Policy Manual:

• Generally allowable direct cost as part of recruiting cost... as long as the institution has an employer/employee relationship with the individual.

• It is the responsibility of the institution to monitor the status of the individual's visa and ensure they have sufficient time to fulfill the obligations of the research they are being paid for on the grant (typically one year).

• If the person is already an employee and the cost in question is a visa renewal then this isn't a recruiting cost so the cost would not be an allowable charge to a grant.
VISA Costs

Allowable:
• When included as a recruitment cost
• Filing fees and Anti-fraud fees are allowed
• Department of Homeland Security fee (SEVIS form I-901) is a required fee

Unallowable:
• Expedited processing fees
• Renewal fees
Guidance for Human Subject Participant Payments on Sponsored Awards:

• Issued at Storrs Spring 2020, currently being updated for UCH

• Offers guidance on:
  - Documentation standards;
  - Compliance with IRS standards;
  - Available methods available to pay subjects;
  - Monitoring, reviewing and closing out grants with Human Subjects.