
Brown Bag
January 15, 2015

Laura Kozma
Assistant Director
Office of Grant & Contract Administration
Overview

- Effective December 26, 2014

- Incorporates of 2 CFR § 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), commonly referred to as A-81

- Impacts both the **Grant Proposal Guide** and the **Award and Administration Guide**
Grant Proposal Guide

Special Exceptions to the Deadline Date Policy

- Natural or Anthropogenic Disaster
  - Request to submit late should be granted in advance of the deadline when possible
  - Request should be sent to the cognizant Program Officer
  - Decisions will be made on a case by case basis
  - Generally, NSF permits extension of deadline by five business days

- Closure of NSF
  - Due to inclement weather or other reason
  - Deadline(s) occurring during the closure will be extended to the following business day after the closure ends
Grant Proposal Guide
Non Compliant Proposals

Proposals will not be accepted or will be returned without review for the following reasons:

- Inappropriate for funding by NSF
- Submitted with insufficient lead-time before the activity is scheduled to begin
- Proposer was not invited to submit after submission of a preliminary proposal
- Is a duplicate of, or substantially similar to, a proposal already under consideration
- Does not meet NSF proposal preparation requirements, such as page limitations, inclusion of all required sections, formatting instructions, and electronic submission, as specified in the Grant Proposal Guide or program solicitation
- Is not responsive to the NSF funding opportunity
- Does not meet an announced proposal deadline date
- Was previously reviewed and declined and has not been substantially revised
- Duplicates another proposal already awarded
Grant Proposal Guide

New Funding Mechanism

- Ideas Lab
  - Support the development and implementation of creative and innovative project ideas that have the potential to transform research paradigms and/or solve intractable problems
  - May run independently or in parallel with the issuance of an NSF funding opportunity on the same topic
  - Typically high-risk/high-impact for new and unproven ideas, approaches and/or technologies
  - Involves a four stage process to fund the proposal
Grant Proposal Guide

*Letters of Intent (LOI)*

- If required by the program solicitation and not submitted by the LOI deadline, the full proposal will not be accepted or will be returned without review
Grant Proposal Guide

Required Proposal Sections

If the required sections are not included, the proposal will be returned without review.

Proposals may deviate if required by the program solicitation or for specific types of proposals (RAPID, EAGER, etc).

Required Sections

a. Cover Sheet
b. Project Summary
c. Table of Contents (automatically generated by FastLane)
d. Project Description
e. References Cited
f. Biographical Sketch(es)
g. Budget and Budget Justification
h. Current and Pending Support
i. Facilities, Equipment and Other Resources
j. Special Information and Supplementary Documentation
   • Data Management Plan
   • Postdoctoral Mentoring Plan (if applicable)
Grant Proposal Guide

Project Description

- Broader Impacts
  - Must be included as a separate section labeled “Broader Impacts of the Proposed Work”

- Results from Prior NSF
  - Must include a complete bibliographic citation for each publication for all publications resulting in the award in either this section or in the References Cited
Grant Proposal Guide

**Biographical Sketch(es)**

- Professional Preparation
  - Location of undergraduate, graduate and postdoctoral institution(s) must now be provided
- Collaborators and Co-Editors
  - The total number must be identified
- Graduate Advisors and Postdoctoral Sponsors
  - The total number must be identified
- Thesis Advisor and Postgraduate-Scholar Sponsor
  - The total number of graduate students advised and postdoctoral scholars sponsored must be identified
- Other Non-Senior Personnel
  - Must clearly identify that the biosketch is for “Other Personnel”
Grant Proposal Guide

Budget and Budget Justification

- Senior Personnel Salaries and Wages
  - Proposal must adhere to NSF salary compensation limit
    - No more than two months of their regular salary in any one year (Yale fiscal year)
    - Includes compensation from all NSF-funded grants
  - Compensation in excess of two months must be disclosed in the budget, justification in the budget justification and specifically approved by NSF in the award notice budget
  - However, effort can be increased or decreased\(^1\) after an award is made, even if it results in overall salary support in excess of two months in any year

\(^1\)Reductions in effort of 25% or more for the PI/PD or co-PI/co-PD require prior NSF approval
Grant Proposal Guide

Budget and Budget Justification, continued

► Administrative and Clerical Salaries
  ► Allowable if all of the following conditions are met:
    ▶ Integral to a project or activity
    ▶ Individuals involved can be specifically identified with the project/activity
    ▶ Costs are explicitly included in the approved budget or have prior written approval from NSF
    ▶ Costs are not also recovered as indirect costs

► Travel
  ► All travel must be specified, itemized and justified by destination and cost
  ► Attendance at meetings or conferences must be necessary to accomplish proposal objectives, or disseminate its results
Grant Proposal Guide

Budget and Budget Justification, continued

► Participant Support Costs
  ► Stipends, subsistence and travel allowances and registration fees for participants or trainees (but not employees) in connection with conferences or training projects are allowable
  ► Other cost categories must be justified in the budget justification and will be closely scrutinized

► Materials and Supplies
  ► Computing devices are allowable if they are essential and allocable, but not solely dedicated to the performance of the award

► Subawards
  ► If the subrecipient does not have a U.S. federally negotiated indirect cost rate(s), the institution may include a *de minimus* indirect cost recovery of 10% of modified total direct costs
  ► Budget justification is limited to no more than three pages

¹The budget justification for Yale is also limited to three pages (no change from the prior PAPPG)
Grant Proposal Guide

Special Information and Supplementary Documentation

- Letters of Collaboration (formally Commitment)
  - Should be limited to stating the intent to collaborate and *should not contain endorsements or evaluation of the proposed project*
  - Letters of support should not be submitted
  - Proposals that contain letters which do not adhere to these instructions will be returned without review
Grant Proposal Guide

Special Guidelines

- Proposals for Equipment
  - References Cited section is no longer required
  - Facilities, Equipment and Other Resources section should include a brief description of other support services available

- Proposals to Conferences
  - NSF funds are not to be spent on meals and coffee breaks for intramural meetings or any of its components including but not limited to, laboratories, departments and centers
  - Facilities, Equipment and Other Resources section is now required
Award and Administration Guide
Requests for NSF Approval

Prior NSF approval is now required for the following if not included and approved in the proposal:

- Salaries of administrative or clerical staff
- Travel costs for dependents when the duration is for six months or more
- Additional categories of participant support costs other than those already described in A-81:
  - Stipends
  - Subsistence allowances
  - Travel allowances
  - Registration fees
- Adding a subaward
- Long-term disengagement of a PI/PD or co-PI/co-PD

Prior to rebudgeting funds to support a postdoctoral research, a mentoring plan must be sent to the cognizant program officer (if the original proposal did not include one).

Prior NSF notification is no longer required for the following:

- Short-term absence (periods up to three months) of the PI/PD or co-PI/co-PD
Award and Administration Guide

Program Income

- Registration fees collected under NSF-support conferences are now considered program income (Note that Yale has always treated conference fees as program income)
In unusual circumstances, small amounts of supplemental funding and up to six months of additional support may be requested to assure adequate completion of the original scope of work.

If supplemental funding is requested to support a postdoctoral researcher and the original proposal did not include a mentoring plan, then the supplemental funding request must include the requisite mentoring plan.

All types of supplemental funding that include a postdoctoral researcher require a mentoring plan if not included in the original proposal.
Award and Administration Guide

Reporting

- Mandatory Cost Sharing
  - Must be reported on an annual and final basis
    - Still required to be separately budgeted and accounted for

- Financial Grant Closeout
  - NSF will financially closeout the grant on the first day of each month for all awards with expirations of 90 or more days
  - All obligations must be liquidated within 90 calendar days of the award end date
Other A-81 Reminders

- **Publications and Printing**
  - Can be directly charged within the 90-day period after award expiration

- **Subawards**
  - Invoices must be paid within 30 days of receipt
  - PIs must ensure that they receive and review all required programmatic reports and maintain them in the department’s award file

- **Recruiting Costs**
  - Allowable as a direct charge, however, if the newly hired employee resigns within 12 months after hire, costs charged to the award must be refunded

- **Visa Costs**
  - Short-term, travel visa costs may be included in the proposal if it is clearly identified as directly connected to the work and critical and necessary to the project
Resources

- NSF Proposal and Award Policies and Procedures Guide (PAPPG)

- A-81
  - https://federalregister.gov/a/2013-30465

- Office of Grant and Contract Administration A-81 Resources and Information
  - http://grants.yale.edu/A81#overlay-context=

- Office of Grant and Contract Administration Staff
  - http://grants.yale.edu/people/all