



National Science Foundation
WHERE DISCOVERIES BEGIN

NSF Policy Update

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Speaker

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2



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Topics

- Uniform Guidance - Background
- *Proposal & Award Policies & Procedures Guide (PAPPG)* Update
 - Uniform Guidance Implementation
 - Other Significant Policy Changes
- Automated Compliance Checking for Proposals
- Research.gov
 - Public Access
 - Research Performance Progress Report Update
 - Award Cash Management Service (ACM\$)
 - IT Modernization

3



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Uniform Administrative 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.

4



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Goal of the Reform Effort

- The goal of this reform is to deliver on the President's directives to: (1) streamline guidance for Federal awards to ease administrative burden; and (2) strengthen oversight over Federal funds to reduce risks of waste, fraud, and abuse.
- Streamlining existing OMB guidance will increase the efficiency and effectiveness of Federal awards to ensure best use of the more than \$600 billion expended annually.

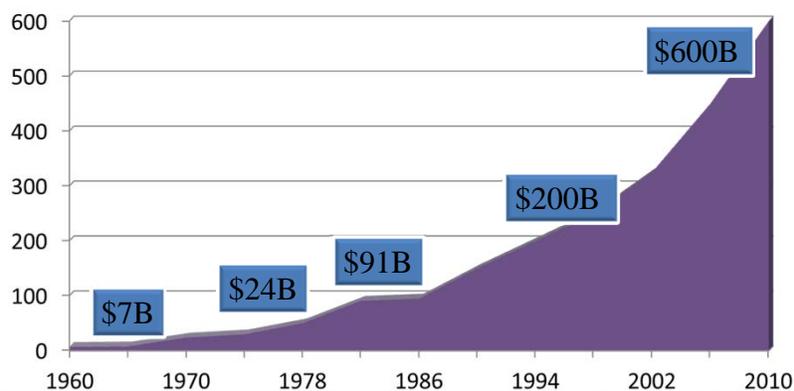
5



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Increase in Federal Grants Activity

The Catalog of Federal Domestic Assistance lists over 2,000 Federal grant programs



6



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Uniform Guidance Implementation by OMB

- OMB published Uniform Guidance on December 26, 2013.
- OMB released FAQs on:
 - February 12, 2014
 - August 29, 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 to issue consolidated government-wide implementation in December, 2014
- Visit cfo.gov/cofar/ for the latest information.

7



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2 CFR 200 - Layout of the Uniform Guidance

- 6 Subparts A through F
 - Subpart A, 200.XX – Acronyms & Definitions
 - Subpart B, 200.1XX – General
 - Subpart C, 200.2XX – Pre Award – *Federal*
 - Subpart D, 200.3XX – Post Award – *Recipients*
 - Subpart E, 200.4XX – Cost Principles
 - Subpart F, 200.5XX – Audit
- 11 Appendices - I through XI

8



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PAPPG – Uniform Guidance Federal Register Comments

- **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 is still waiting for final clearance from OMB**

9



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PAPPG – Uniform Guidance Federal Register Comments (Cont'd)

- **54 responses from 18 different institutions/individuals**
- **27 regarding GPG; 18 regarding AAG (with one duplicated in both); two “other”; and seven “concur with COGR memo of 07/01/14”**

10



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Where to find Department/Agency Implementation, When Available

Subtitle B—Federal Agency Regulations for Grants and Agreements		
III	300-399	DEPARTMENT OF HEALTH AND HUMAN SERVICES
IV	400-499	DEPARTMENT OF AGRICULTURE
VI	600-699	DEPARTMENT OF STATE
VII	700-799	AGENCY FOR INTERNATIONAL DEVELOPMENT
VIII	800-899	DEPARTMENT OF VETERANS AFFAIRS
IX	900-999	DEPARTMENT OF ENERGY
XI	1100-1199	DEPARTMENT OF DEFENSE
XII	1200-1299	DEPARTMENT OF TRANSPORTATION
XIII	1300-1399	DEPARTMENT OF COMMERCE
XIV	1400-1499	DEPARTMENT OF THE INTERIOR
XV	1500-1599	ENVIRONMENTAL PROTECTION AGENCY
XVIII	1800-1899	NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
XX	2000-2099	UNITED STATES NUCLEAR REGULATORY COMMISSION
XXII	2200-2299	CORPORATION FOR NATIONAL AND COMMUNITY SERVICE
XXIII	2300-2399	SOCIAL SECURITY ADMINISTRATION
XXIV	2400-2499	DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
XXV	2500-2599	NATIONAL SCIENCE FOUNDATION
XXVI	2600-2699	NATIONAL ARCHIVES AND RECORDS ADMINISTRATION
XXVII	2700-2799	SMALL BUSINESS ADMINISTRATION
XXVIII	2800-2899	DEPARTMENT OF JUSTICE

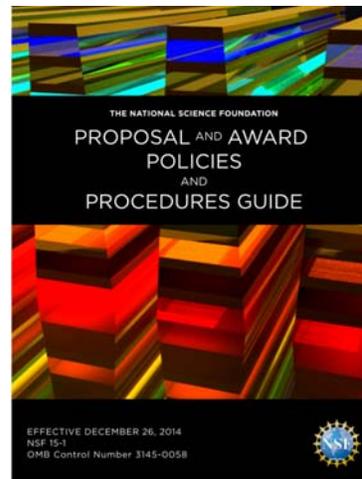
11



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PAPPG – Upcoming Policy Changes

- **NSF Implementation of OMB's Uniform Guidance**
- **Other Significant Policy Changes**



12



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PAPPG – Uniform Guidance Federal Register Comments

- **Common topics:**
 - Inclement weather policy
 - Subawards and subaward budgets
 - Indirect costs (and application of the 10% *de minimus* rate)
 - Grant closeout
 - Record retention and audit
 - Procurement

13



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Effective Dates and Grace Period for Procurement

Will the Federal government provide a grace period after the effective date for non-Federal entities to comply with the procurement standards in the Uniform Guidance?

Yes, for one full fiscal year after the effective date of the Uniform Guidance. In general non-Federal entities must comply with the terms and conditions of their Federal award, which will specify whether the Uniform Guidance applies. However, in light of the new procurement standards, for procurement policies and procedures, for the non-Federal entity's first full fiscal year that begins on or after December 26, 2014, the non-Federal entity must document whether it is in compliance with the old or new standard, and must meet the documented standard. For example, the first full fiscal year for a non-Federal entity with a June 30th year end would be the year ending June 30, 2016. The Single Audit Compliance Supplement will instruct auditors to review procurement policies and procedures based on the documented standard. For future fiscal years, all non-Federal entities will be required to comply fully with the uniform guidance.

14



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PAPPG – Uniform Guidance Significant Changes to the GPG

- **Administrative and Clerical Salaries & Wages**
- **Travel**
- **Participant Support**
- **Materials and Supplies**
- **Subawards**
- **Indirect Costs**
- **Risk Management Framework**

15



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PAPPG – Uniform Guidance Significant Changes to the AAG

- **AAG vs. 2 CFR § 200 – which takes precedence**
- **NSF Award Conditions**
- **Notifications and Requests**
- **Cost Sharing**
- **Financial Requirements/Payments**

16



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PAPPG – Uniform Guidance Significant Changes to the AAG

- **Program Income**
- **Final Disbursement Reporting**
- **Financial Management, Property,
Procurement Management**
- **Suspension and Termination Procedures**

17



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Uniform Guidance - NSF Deviations

- **NSF Policy on Salaries and Wages (two month policy)**
 - 2 CFR § 200, Subpart E does not contain a limit on salaries
 - NSF is retaining the Foundation's long-standing limitation of the salary compensation requested in the proposal budget for senior personnel on awards made by the Foundation, to no more than two months of their regular salary in any one year. This limit includes salary received from all NSF-funded grants. This policy is articulated in the NSF Proposal and Award Policies and Procedures Guide (PAPPG) Part I: Grant Proposal Guide (GPG) Chapter II.C.2.g.(i). NSF's two month compensation policy has been in effect since 1958 and has remained largely unchanged from when it was originally memorialized in the 1978 NSF document entitled Grants for Scientific Research (NSF 78-41).
- **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

18



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PAPPG – Other Significant Changes Grant Proposal Guide (GPG)

- **Special Exceptions to Deadline Date Policy – Inclement Weather**
- **Format of the Proposal – Automated Compliance checking**
- **Project Description – Broader Impacts**
- **Results from Prior NSF Support**
- **Budget Justification**
- **Ideas Lab**

19



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PAPPG – Other Significant Changes Award Administration Guide (AAG)

- **Supplemental Support**
- **Prior Written Approvals**
- **Research Terms and Conditions**

20



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Uniform Guidance: NSF Key Dates

- **Proposal Preparation: Effective immediately, all new announcements and solicitations will include the following language:**
 - A revised version of the NSF Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 15-1), is effective for proposals submitted, or due, on or after December 26, 2014. The PAPPG is consistent with, and implements the new Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance) (2 CFR § 200). NSF anticipates release of the PAPPG in the Fall of 2014. Please be advised that, depending on the specified due date, the guidelines contained in NSF 15-1 may apply to proposals submitted in response to this funding opportunity.
- **All new awards and funding increments to existing awards will be subject to the Uniform Guidance effective December 26, 2014.**

21



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Automated Compliance Checking

- **March 2013, NSF enforced the following GPG required proposal sections during proposal intake:** (**already being auto-compliance checked*)
 - *Project Summary**
 - Project Description
 - References Cited
 - Biographical Sketch(es)
 - Budget
 - Budget Justification
 - Current and Pending Support
 - Facilities, Equipment & Other Resources
 - Supplementary Documentation
 - *Data Management Plan **
 - *Postdoctoral Mentoring Plan (where applicable) **
- **Non-Compliance Findings:**
 - Triggered when the PI checks the proposal, forwards it to the SPO, and when the SPO submits to NSF
 - Error (hard stop) or Warning Message

22



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Automated Compliance Checking

- **Future GPG-specific auto-compliance checks**
 - 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
- **Funding Mechanism/Proposal Section auto-compliance checks, anticipated early FY2015:**
 - Enforce proposal sections depending on the funding mechanism type
 - Example: enforce a project description for a research grant

23



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Research Performance Progress Report (RPPR) Update

- 68,000+ project reports submitted via Research.gov
- Continuous enhancements to improve user experience
 - View Project Reports (August 2014)
 - Video Tutorials
 - Standardized Error Messages
 - Pre-population

24



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Public Access Plans

- OSTP memo required agencies to develop plans to increase access to publications and data. Underlying principles:
 - Maintains the importance of peer review and the role of publishers
 - Calls for collaboration among agencies and stakeholder groups
 - Does not specify a funding strategy, allowing for experimentation
 - Does not specify a technical approach but does encourage leveraging existing archives

25



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NSF Public Access Key Principles

- Focus on publications in the initial implementation
- Minimize burden on PI
- Protect PI autonomy
- Evolve incrementally
- Learn from one phase to inform the next
- Leverage existing practices and systems
- Honor NSF's customer service standard
- Provide ways to communicate and petition for a waiver
- Requirement will follow standard procedures and be implemented as part of the NSF PAPPG

26



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Public Access: What should you expect?

- OSTP approved plan, FAQs, guidance will be posted to www.nsf.gov, when available
- Technical pilot will provide opportunity for feedback
- Changes to procedures will be announced with opportunities for notice/comment as required by Federal-policies
- NSF will retain *existing* requirements and practices to the extent possible
- Look for more specific guidance at the program/ division/directorate levels
- ListServ – system_updates-subscribe-request@listserv.nsf.gov – Updates on Public Access, events, and enhancements to Research.gov and/or FastLane

27



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Award Cash Management Service (ACM\$)

- Award appears in ACM\$ within days after the award is approved.
- Eliminated FFR reporting, now able to submit at the award level. Able to obtain up to date financial activity 'real time'.
- Program income reporting (effective March 2014)
- As of October 1, NSF began making all payments using System for Award Management (SAM) banking information

28



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Research.gov Usability: Single Sign-on

- Researchers and SPOs can use their university ID and password to login to Research.gov via InCommon
 - As of August 2014, 67 institutions are connected with Research.gov
 - Approximately 30 more institutions are in the pipeline
- Goals
 - Convenience to research community
 - Integration opportunities with institutions
 - Lower support costs
- Single Sign-on between Research.gov and FastLane

29



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Research.gov Notifications & Requests

- Modernize and migrate to Research.gov
 - Planning activities to begin in FY 2014
 - Development and release of functionality in FY 2015
 - Implement OMB's Uniform Guidance

30



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Introduction to Proposal Submission Modernization (PSM)

- PSM is a multi-year effort to modernize proposal system functions currently in FastLane
- Modernization includes the migration of proposal preparation / submission functionality to Research.gov
- Planning began in FY14 and will continue through FY15
- Identifying process, data, and technology enhancements and phased approach to migrating functionality to R.gov
 - New functionality will be released incrementally

31



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PSM in Context

- NSF launched FastLane in 1994
 - Originally designed to translate a paper process to computer
 - System design principles have evolved over the 20 years
- FastLane's rigid architecture precludes it from being easily adapted to meet evolving program needs
 - Proposal form changes require extensive work, are expensive
 - Limited data exchange/pre-population across systems
- Related projects have commenced (e.g., auto compliance checks, SciENCv and ORCID pilot plans)
- To ensure you keep up-to-date on PSM efforts, sign up for the R.gov listserv: System_Updates-subscribe-request@listserv.nsf.gov

32



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Key Documents

- **Proposal & Award Policies & Procedures Guide**
nsf.gov/publications/pub_summ.jsp?ods_key=papp
- **Fiscal Year 2015 Budget Request**
nsf.gov/about/budget/fy2015/index.jsp
- **NSF Strategic Plan for Fiscal Years 2014-2018**
nsf.gov/publications/pub_summ.jsp?ods_key=nsf14043
- **NSB Report on Merit Review**
nsf.gov/nsb/publications/pub_summ.jsp?ods_key=nsb1333

33



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For More Information

Ask Early, Ask Often!

nsf.gov/staff

nsf.gov/staff/orglist.jsp

nsf.gov/about/career_opps/rotators/index.jsp

34



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