Sponsored Programs
New Developments
and
Important Reminders

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Training Session Overview

- Uniform Guidance
- NSF Proposal & Award Policies and Procedures Guide (PAPPG) 15-1
- NIH Updates & Reminders
- OSP Updates & Reminders
- Q & A
Uniform Guidance

2 CFR 200

Legacy Guidance

- OMB Circular A-21, Cost Principles for Educational Institutions
- OMB Circular A-110, Uniform Administrative Requirements for Grant and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations
- OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations

- Separate circulars for universities, state agencies, and hospitals. While similar in nature, there are some differences.
New Guidance (effective for awards issued on or after 12/26/2014)

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200)
- Combines 8 circulars into a Uniform guidance which will cover all types of entities. The uniform guidance includes sections on cost principles, audit and administration.
  - Also applies to for profit entities.
- LSU has a working group reviewing the uniform guidance to determine what changes will be needed.

Administrative and Clerical Salaries (200.413)

- Should still be treated as F&A costs and not be direct charged
- Direct charging may be appropriate if all of the following conditions are met:
  1. The services are integral to a project or activity;
  2. Individuals involved can be specifically identified with the project or activity;
  3. Such costs are explicitly included in the budget or have the prior written approval from the federal agency; and
  4. The costs are not also recovered as indirect costs
- Continue to include in budget justification or seek prior approval from sponsor at post award stage.
- Eliminates the “major project or activity” and “unlike circumstances” distinctions included in A-21.
**Uniform Guidance**

**Computing Devices (200.453)**
- Can be direct charged if they are essential and allocable, even if not solely dedicated, to the project.
- Continue to include language in budget justification to address relationship to project.
- Computing devices <$5,000 are supplies, regardless of useful life.

**Cost Sharing (200.306)**
- Federal agencies must require cost sharing or not consider it at all.
- Requirements for cost sharing must be included in the funding opportunity.

**Conflict of Interest (200.112)**
- Requires federal agencies to establish conflict of interest policies for awards which will require the non-federal entity or pass-through entity to disclose in writing any potential conflict of interest.
- Per FAQ, this policy refers to conflicts that might arise around how a non-federal entity expends funds under a federal award, and does not refer to scientific conflicts of interest.
  - Examples: selection of subrecipient or procurements.
- Currently NSF and PHS(NIH) have policies on financial conflict of interest.
- Stayed tuned for each agency implementation.
- OSP and Purchasing are reviewing processes for identifying conflicts of interest in subawards and other procurements.
**Uniform Guidance**

**F&A Rates (200.414 and 200.331)**
- Requires federal agencies to accept federally negotiated F&A rates.
- Use by a federal agency of a different F&A rate for a class of awards or a single award is allowed only when required by statute or regulation or when OMB is notified of any approved deviations by the federal agency head.
- Requires that pass-through entities include federally negotiated rates in any subawards.
  - LSU’s Federal F&A rate should be used and honored for federal flow-through awards from state agencies and other entities.

**Participant Support Costs (200.68, 200.75, 200.308, 200.456)**
- Previously allowed based on agency specific guidance (e.g. National Science Foundation).
- Defined as “Items such as 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.”
- Must be included in proposal budget justification or seek prior approval from sponsor.
- Excluded from definition of Modified Total Direct Costs.
  - OSP has revised budget templates to include participant support costs.
- Rebudgeting of participant support costs to other categories requires prior approval.
**Uniform Guidance**

**PI Absences (200.308)**
- A-110 required agency prior approval for the *absence* of the PI for more than 3 months.
- UG requires prior approval for the *disengagement from the project* of more than 3 months by the PI.
- Prior approval is still needed for a reduction in effort of 25% or more for the PI.
  - Some agencies require approval for PI and other senior personnel.

**Procurement (200.317-326)**
- Provides detailed and prescriptive methods for procurement.
- New requirements for documentation of competition dependent on purchase price
  - Purchases over $3,000 must be competitive in some way and document competition
- OMB has deferred implementation for one year to allow entities time to modify and develop procurement procedures to become consistent with the Uniform Guidance.

**Publication (200.461)**
- Under A-21 allowed when incurred within the period of performance.
- UG also allows for costs associated with publication or sharing of research results for costs incurred after the period of performance end date, but before closeout.
**Uniform Guidance**

**Subawards (200.201, 200.330-332, 200.414)**

- Requires institutions to perform a risk assessment on subawards prior to issuing the subaward in order to determine appropriate level of monitoring.
- Establishes a de minimus rate of 10% of Modified Total Direct Costs (MTDC) to be used for entities that do not have a federally negotiated rate.
- Requires institutions to obtain agency’s prior approval prior to issuing fixed price subawards.
  - Only fixed-price subawards up to $150,000 are allowed.
- Requires a new certification at the end of the project that the activity or level of effort was completed.

**Visa Charges (200.463)**

- Costs associated with short term, travel visas are allowable as a recruitment cost when:
  - Issued for a specific period and purpose
  - They can be clearly identified as directly connected to the work performed
  - Critical skills are needed to conduct the project
NSF Proposal & Award Policies and Procedures Guide (PAPPG)

- NSF 15-001 effective 12/26/2014
- Effective for proposals submitted or due on or after 12/26/2014.
Revisions made to budget instructions to incorporate Uniform Guidance language:
- Administrative and Clerical Salaries & Wages
- Travel
- Participant Support
- Materials and Supplies (Computer Devices)
- Subawards
- Indirect Costs (de minimis rate of 10% MTDC)
- Conference proposals

Participant Support:
- Limits allowability to those items in UG definition.
- Additional items such as incentives, gifts, souvenirs, t-shirts and memorabilia must be justified in the budget justification and such costs will be closely scrutinized by NSF.

Subawards:
- Must also include a budget justification which is limited to 3 pages.
  - Separate from lead institution’s justification.
Project Narrative
- Must contain a separate section labeled “Broader Impacts of the Proposed Work”
- Results from Prior NSF Support
  - Listing of publications resulting from NSF award must provide a complete bibliographic citation for each publication in this section or References Cited section.

Biographical Sketch
- Inclusion of personal information is not appropriate (e.g. home contact information, marital status, hobbies, etc.)
- Professional Preparation section should now include location of educational training.
- Collaborators section needs to include the total number of individuals.
- If including biosketches of Other Personnel, clearly identify as “Other Personnel” biographical information.

Supplementary Documentation - Letters of Collaboration
- Should be limited to stating the intent to collaborate.
- Should not contain endorsements.
- While allowable, they should not be submitted unless required by the program as they are not standard component of an NSF proposal.
- NSF will return without review proposals that are not consistent with guidelines.
Internal Prior Approvals
- Senior Personnel effort greater than 2 months
  - States that institutions can internally approve senior personnel effort of more than 2 months after an award is made

NSF Prior Approvals (FastLane Requests)
- Salaries of Administrative and Clerical Staff
- Additional Categories of Participant Support Costs
  - Such as incentives, gifts, souvenirs, t-shirts and/or memorabilia.
  - Short-Term Absence of PI (<3 months) will be eliminated.

Effective 01/26/2015
- Page Counts
  - Project Description - 15 pages (exception for EAGER and RAPID)
  - Budget Justification - 3 pages/institution
    - Now required to be uploaded as PDF. Can no longer enter in text box.
  - Mentoring Plan - 1 page
  - Data Management Plan - 2 pages
- Budget
  - Will enforce maximum requested amount and proposal duration for EAGER and RAPID proposals.

NIH Salary Cap increased

- NOT-OD-15-049

- Effective 01/11/2015, the NIH salary cap limit, Executive Level II of the Federal Executive Pay Scale has increased:
  - $183,300 for 12 month appointment
  - $137,475 for 9 month appointment
  - $15,275/month

- No adjustments will be made to current awards
  - You may rebudget to accommodate the current Executive Level II salary level.

- New and competing awards with detailed budgets reflecting salary levels at or above the new cap, will be adjusted to reflect the new cap.
**NIH Modified Guidance for Resubmission Applications**

- NOT-OD-15-030

- For Resubmission applications, NIH has removed requirement to identify “substantial scientific changes” in the text.

- No longer need to bracket, indent, or change typography

- It is sufficient to outline the changes in the Introduction attachment.

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**NIH Modified Biosketch**

- NOT-OD-15-032

- Transitioning to new biosketch format
  - Recommended for due dates on or after January 25, 2015
  - Required for due dates on or after May 25, 2015

- Page limit increases to 5 pages instead of 4 pages.
  - We will get a warning if 5 page biosketch.
  - Need to correct to 4 pages if using old format or proposal will not be reviewed.
  - Error is generated if over 5 pages.

- Emphasizes accomplishments instead of publications.
  - Personal Statement
  - Positions and Honors
  - Contributions to Science
  - Research Support

- Revised sample NIH Grants.gov application package on OSP website.
**NIH Research Performance Progress Report (RPPR)**

- May 1, 2013 - Required for Streamlined Non-competing Award Process (SNAP) and Individual Fellowship progress reports.
- January 31, 2014 - Required for multi-year funded (MYF) awards.
- October 17, 2014 - Required for all non-SNAP progress reports.
  - NOT-OD-14-092
  - Includes Institutional Training Grants, Program Projects, Center Grants, and Career Development Awards.
- The RPPR is used for Type 5 (non-competing continuation) annual reports, not final reports at this time.

**NIH Individual Development Plans (IDPs)**

- NOT-OD-14-113 and NOT-OD-13-093
- IDPs are used to identify and promote the career goals of graduate students and postdoctoral researchers associated with the award.
- Beginning October 1, 2014.
  - Annual RPPRs must include a description of whether the institution uses IDPs or not and how they are employed to help manage the training and career development of those individuals in Section B.4.
  - ORED and the Graduate School are meeting to determine how use of the IDPs will be mandated.
  - In the interim, it is recommended that PI’s address any existing mentoring plans for their research group and also utilize the American Association for the Advancement of Science’s myIDP tool located at http://myidp.sciencecareers.org/.
Who needs a eRA Commons ID at the proposal stage?
- PI/PD
  - Included in the Credentials field on the Senior/Key Person Profile

Who needs a eRA Commons ID for the progress report?
- PI/PD
- Postdoctoral Researchers*
- Graduate students*
- Undergraduate students*
  * With one month or more of effort reported on the Participant Table.

To request an eRA Commons account:
- Email osp@lsu.edu
  - PAWS ID
  - User Name you would like to use (minimum of 6 characters)
  - Requested Role (e.g. PI, Postdoc, Graduate Student, Undergraduate Student, or other role).
  - Include “NIH Account Request” in subject line
OSP Updates & Reminders

Revised budget templates
- Include participant support costs which are exempt from F&A.
- SF 424 (R&R) budget template coming soon.

Revised Sample NIH Grants.gov Adobe package
- Addresses new biosketch format
- Provides additional guidance for multi-PI proposals.
Changes coming soon to SPS related to compliance questions.

As a reminder, investigators should be answering compliance questions as they are most familiar with the proposal.
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