ESTABLISHED PROGRAM TO STIMULATE COMPETITIVE RESEARCH (EPSCOR)

# EPSCORPI MEETING

PRE AND POST AWARD

**MANAGEMENT** 

MAY 2024



## ACRONYMS

GRANTS MANAGEMENT SPECIALIST (GMS)

DIVISION OF GRANTS & AGREEMENTS (DGA)

DIVISION OF INSTITUTION AND AWARD SUPPORT (DIAS)

PROPOSAL AND AWARD POLICIES AND PROCEDURES GUIDE (PAPPG)

# AGENDA

DGA OVERVIEW

WHAT IS MY
ROLE?

NOTIFICATIONS
& REQUESTS

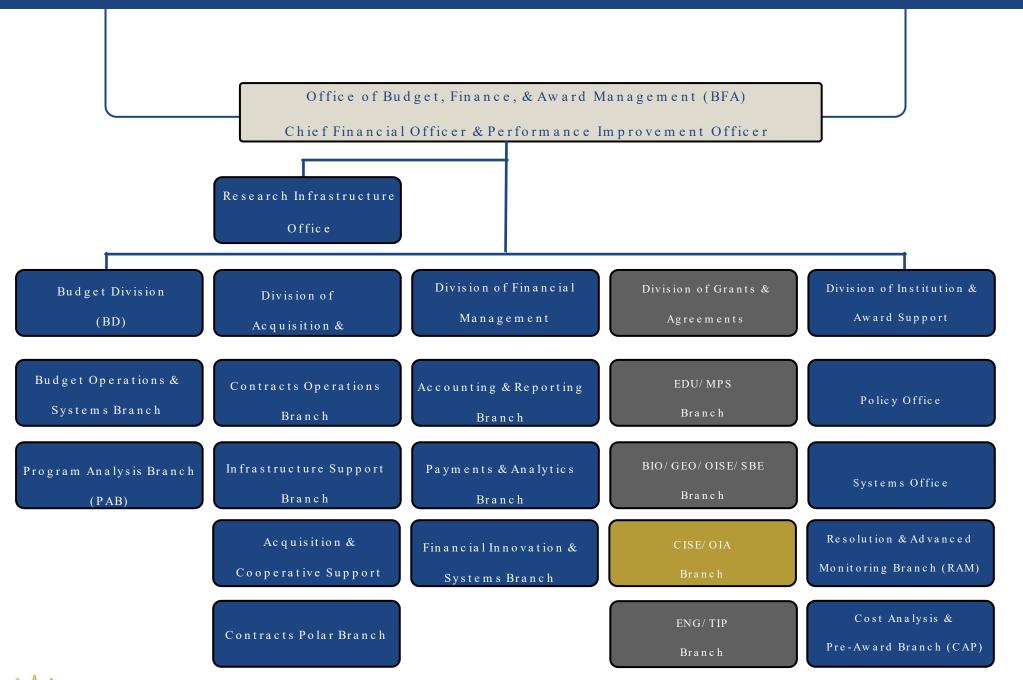
PROCESSING
DELAYS

DIAS OVERVIEW ENSURING SUCCESS AUDIT FINDINGS Q&A SESSION



# The Division of Grants & Agreements

(DGA)





**GMS** 

CCF/OIA Directorates.

cbrownmo@nsf.gov

(703) 292-8709



PRINCIPAL INVESTIGATOR (PI)

PROGRAM OFFICER (PO)

GRANTS MANAGEMENT

SPECIALIST (GMS)

SPONSORED RESEARCH

OFFICE (SRO)

# WORKING RELATIONSHIPS

Princip a 1

Investigator



Program

Officer



Sponsored Research

Officer



Grants Management

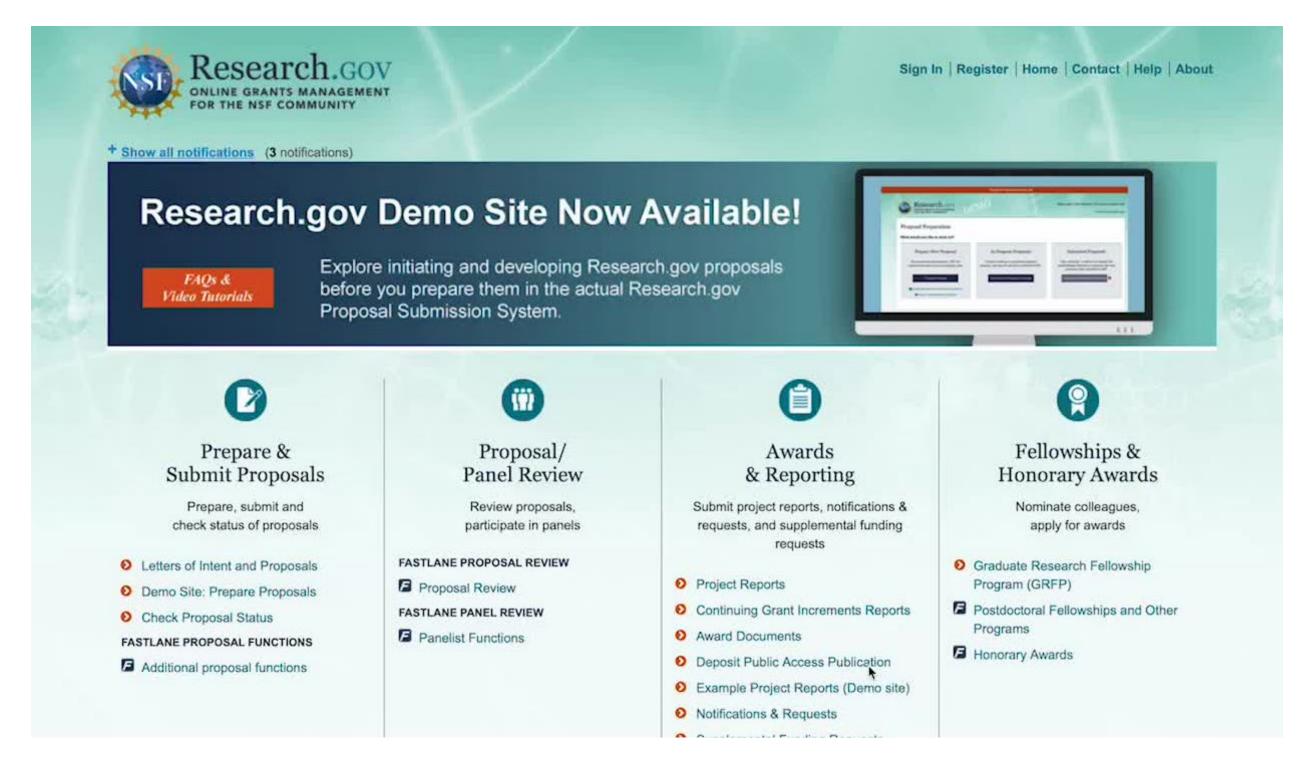
Specia list



# NOTIFICATIONS & REQUESTS

## NOTIFICATION & REQUESTS

www.research.gov



# PROCESSING DELAYS

## TOP 3 REASONS FOR DELAYS

### IN AWARD PROCESSING



### OVERDUE PROJECT REPORTS

Annual Project Reports (APR), Interim Reports, Final Annual Project Reports (FPR), and Project Outcomes Report for the General Public (POR).



## NOT FOLLOWING SOLICITATION REQUIREMENTS

DGA reviews the proposal to ensure budgetary and administrative conditions are in accordance with the solicitation.



### UNALLOWABLE OR UNJUSTIFIED BUDGET ITEMS

PAPPG <u>II.D.2.f(xiii)</u> & 2 CFR 200, Subpart E provides comprehensive information regarding costs allowable under Federal awards.



# REPORTING REQUIREMENTS

Annual Project Report (APR)

Must be approved by the NSF Program
Officer.

Annual reports are due 90 days prior to the end of the current budget period.

Final Reports
(FPR)

Must be approved by the NSF Program Officer.

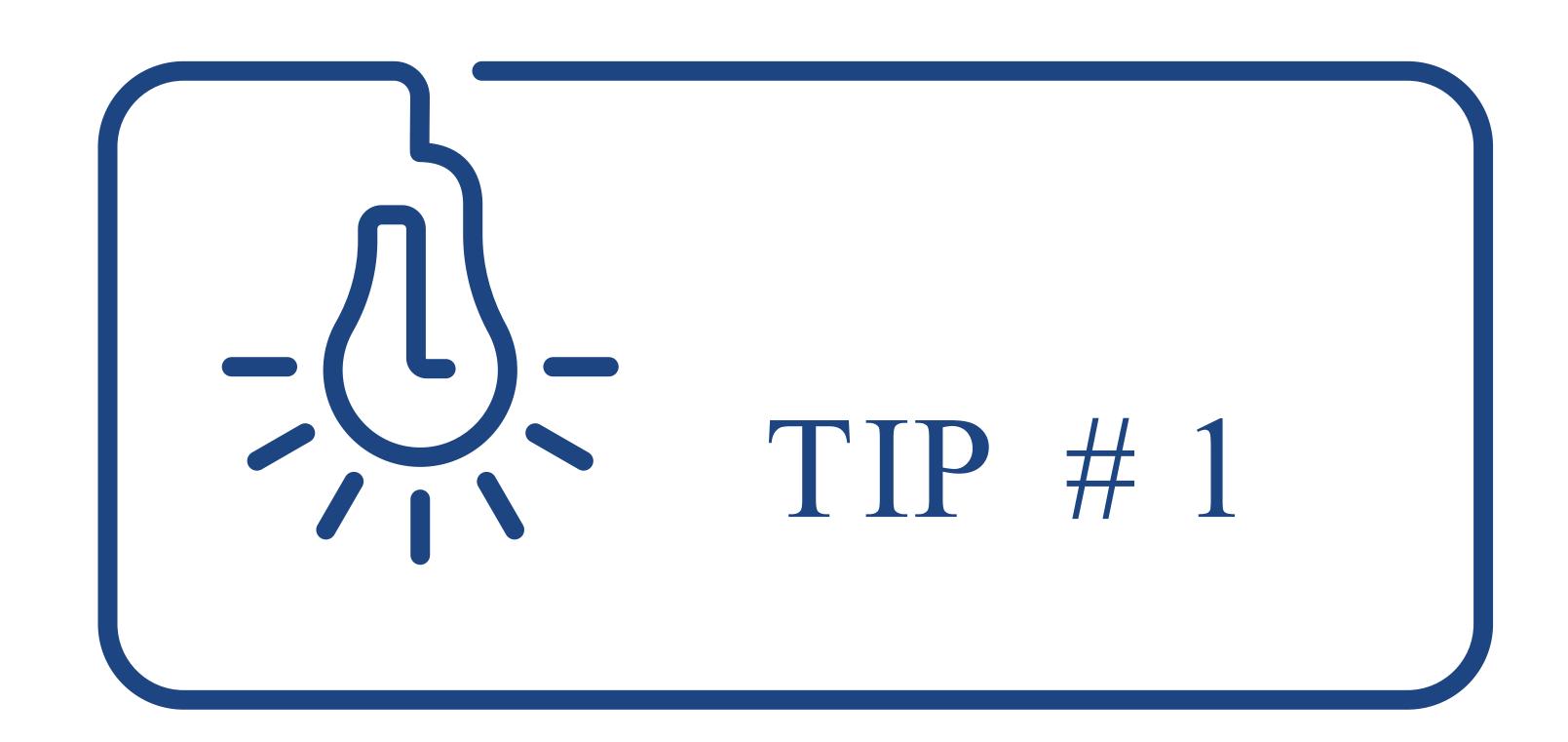
Final reports are due <u>120</u> days after the end date of the award.

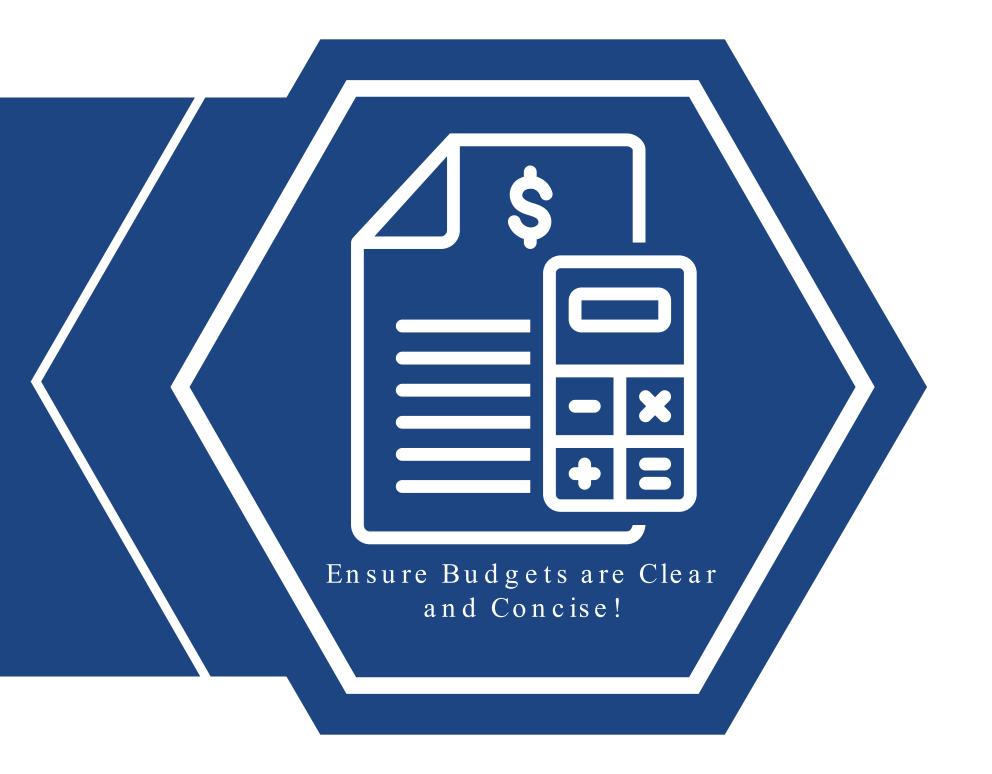
Project
Outcomes
Report (POR)

Not approved by the NSF Program Officer.

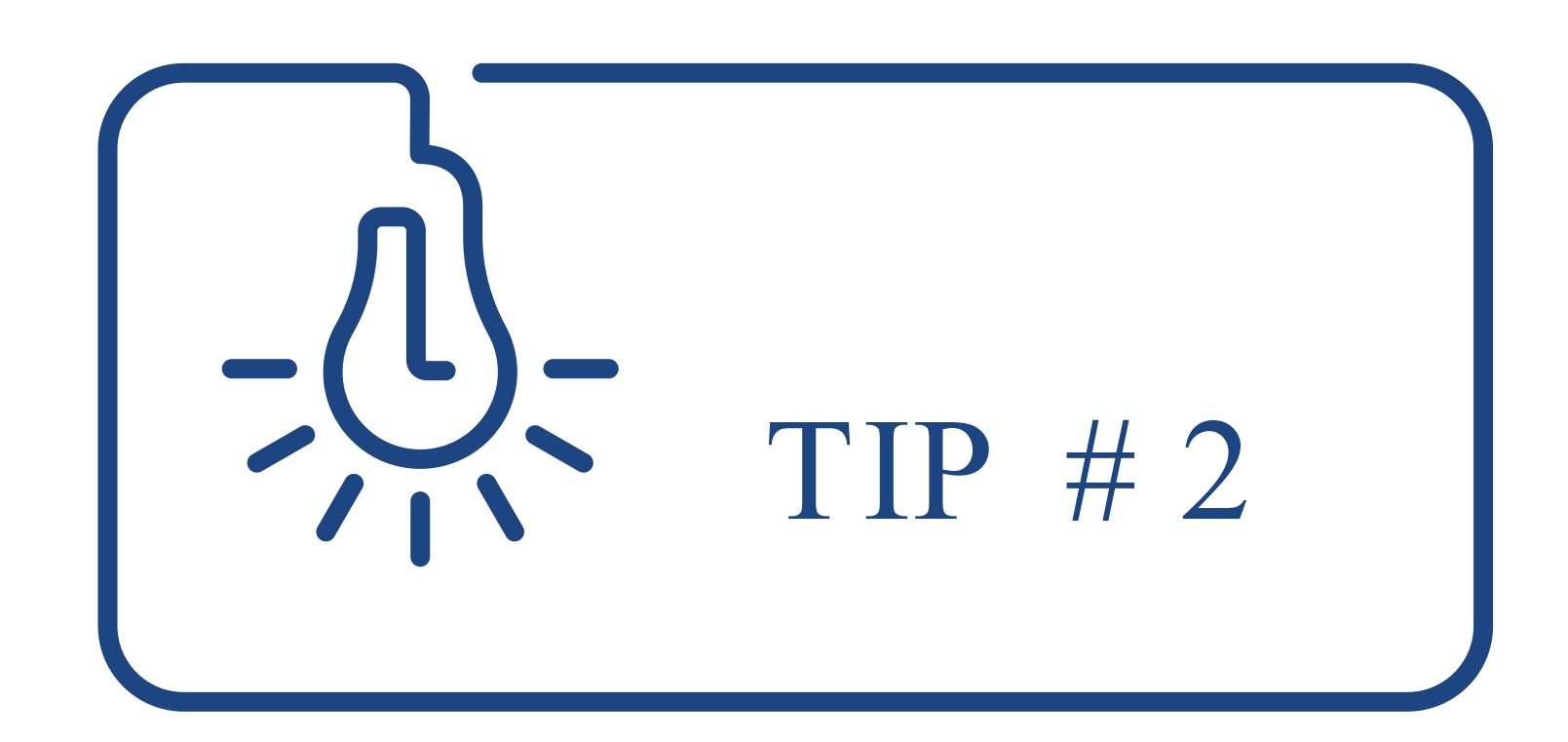
Project Outcomes
Report are due <u>120</u>
days after the end
date.

# THREE TIPS TO REMEMBER



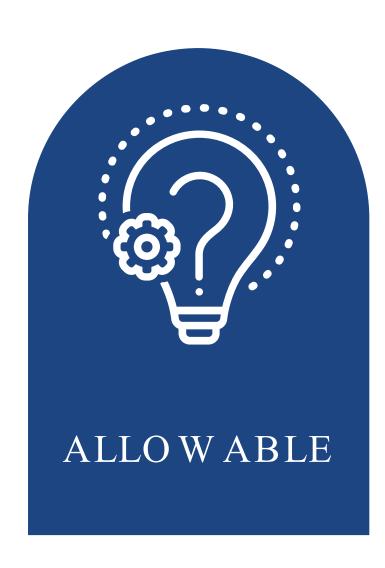


SUMMARY		YE	AR Cun			
PROPOSAL BUDG	<u>EI</u>			R NSF USE ONLY		
ORGANIZATION PROPOS/		OPOSAL	L NO. DURATION (month			
					Proposed	Granted
PRINCIPAL INVESTIGATOR / PROJECT DIRECTOR		A	WARD N	0.		
A. SENIOR PERSONNEL: PI/PD, Co-PI's, Faculty and Other Senior Associates		NSF Fund	SF Funded		Funds	Funds
(List each separately with title, A.7. show number in brackets)	CAL	ACAD	SUMR	pred	pested By oposer	granted by No (if different)
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2.						
3.						
4.						
5.						
6. ( 0 ) OTHERS (LIST INDIVIDUALLY ON BUDGET JUSTIFICATION PAGE)	0.0	0.0	0.0		0	
7. (0 ) TOTAL SENIOR PERSONNEL (1 - 6)	0.0	_	0.0		0	
B. OTHER PERSONNEL (SHOW NUMBERS IN BRACKETS)						
1. ( 0 ) POST DOCTORAL SCHOLARS	0.00	0.00	0.00		0	
2. ( 0 ) OTHER PROFESSIONALS (TECHNICIAN, PROGRAMMER, ETC.)	0.00	0.00	0.00		0	
3.( 0 ) GRADUATE STUDENTS					0	
4.( 0 ) UNDERGRADUATE STUDENTS					0	
5. ( 0 ) SECRETARIAL - CLERICAL (IF CHARGED DIRECTLY)					0	
6. ( 0 ) OTHER					0	
TOTAL SALARIES AND WAGES (A + B)					0	
C. FRINGE BENEFITS (IF CHARGED AS DIRECT COSTS)					0	
TOTAL SALARIES, WAGES AND FRINGE BENEFITS (A + B + C)					0	
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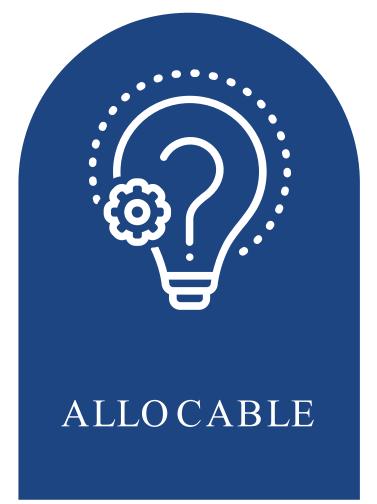


# UNIFORM GUIDANCE COST PRINCIPLES

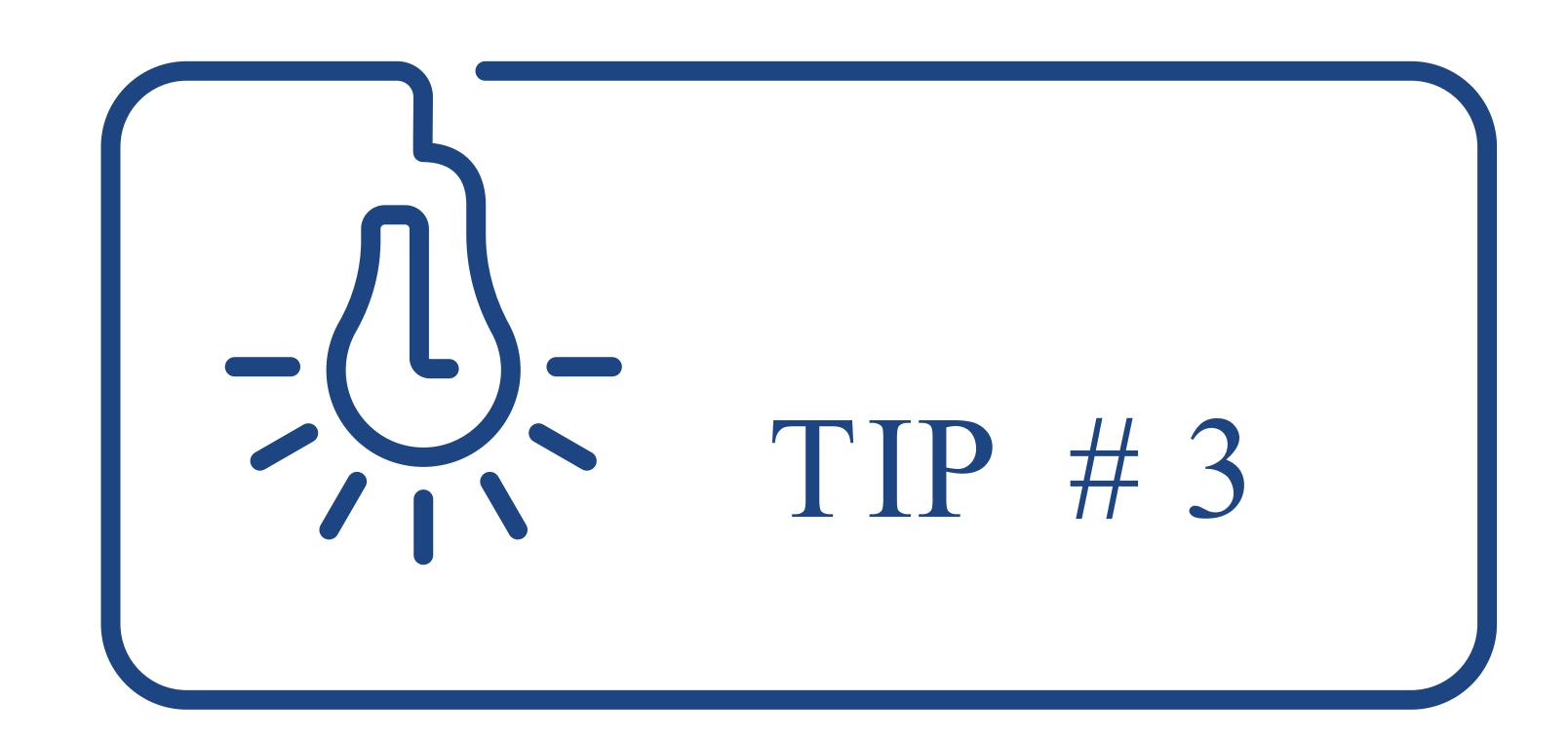
(2 CFR 2OO)













#### NATIONAL SCIENCE FOUNDATION

#### Award Notice

Award Number (FAIN): XXXXXXX Managing Division Abbreviation:

Amendment Number: 000

XXX

#### AWARDEE INFORMATION

Award Recipient: XXXXXXXX Awardee Address: XXXXXXXXXXX

Official Awardee Email Address: xxxxxxx@xxxxxxxxxx Unique Entity Identifier (DUNS ID): XXXXXXXXXXX

#### AMENDMENT INFORMATION

Amendment Type: New Project Amendment Date: XX/XX/XXXX Amendment Number: 000 Proposal Number: XXXXXXX

#### Amendment Description:

The National Science Foundation hereby awards a XXXXX for support of the project described in the

#### AWARD INFORMATION

Award Number (FAIN); XXXXXXX Award Instrument: XXXXXX Grant Award Date: XX/XX/XXXX

Award Period of Performance: Start Date: XX/XX/XXXX End Date: XX/XX/XXXX

#### FUNDING INFORMATION

Amount Obligated by this Amendment: \$XXX,XXX Total Intended Award Amount: \$XXX,XXX Total Approved Cost Share or Matching Amount: \$X Total Amount Obligated to Date: \$XXX,XXX Expenditure Limitation: Not Applicable

Contingent on the availability of funds and scientific progress of the project, NSF expects to continue support at approximately the following level:

#### PROJECT PERSONNEL

Principal Investigator: Email: xxx@xxxx.xxx Institution: XXXXXX XXXXXX

#### NSF CONTACT INFORMATION

Managing Grants Official
(Primary Contact)
Name: XXXXXX
Email: xxxxx@xxxx.xxx

Awarding Official Name: Managing Program Officer
Name: XXXXXX
Email: xxxxx@xxxx.xxx

Managing Program Officer
Name: XXXXXXX
Email: xxxxx@xxxx.xxx

#### GENERAL TERMS AND CONDITIONS

This is awarded pursuant to the authority of the National Science Foundation Act of 1950, as amended (42 U.S.C. 1861-75) and is subject to Research Terms and Conditions (RTCs) dated XX/XX/XXXX, and NSF Agency Specific Requirements, dated XX/XX/XXXX available at <a href="https://www.nsf.gov/awards/managing/rtc.jsp.">https://www.nsf.gov/awards/managing/rtc.jsp.</a>

#### XXXX XXXX X X XXXXX XXXXX XXXXX X XXX

This award is made in accordance with the provisions of NSF Solicitation: XXXXX XXXXX XXXXXX

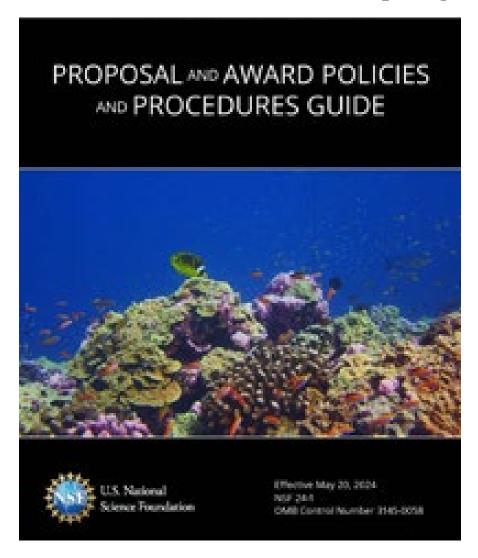


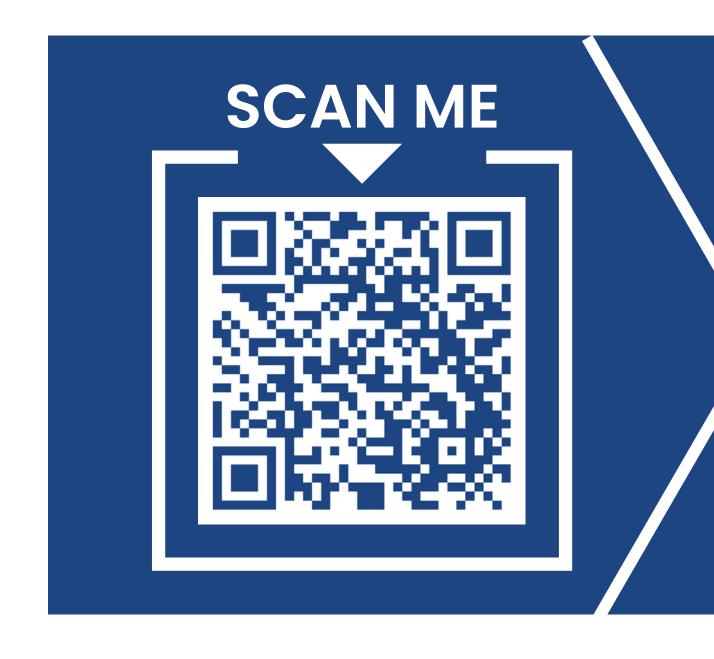


# NEW PAPPG

### EFFECTIVE MAY 20, 2024

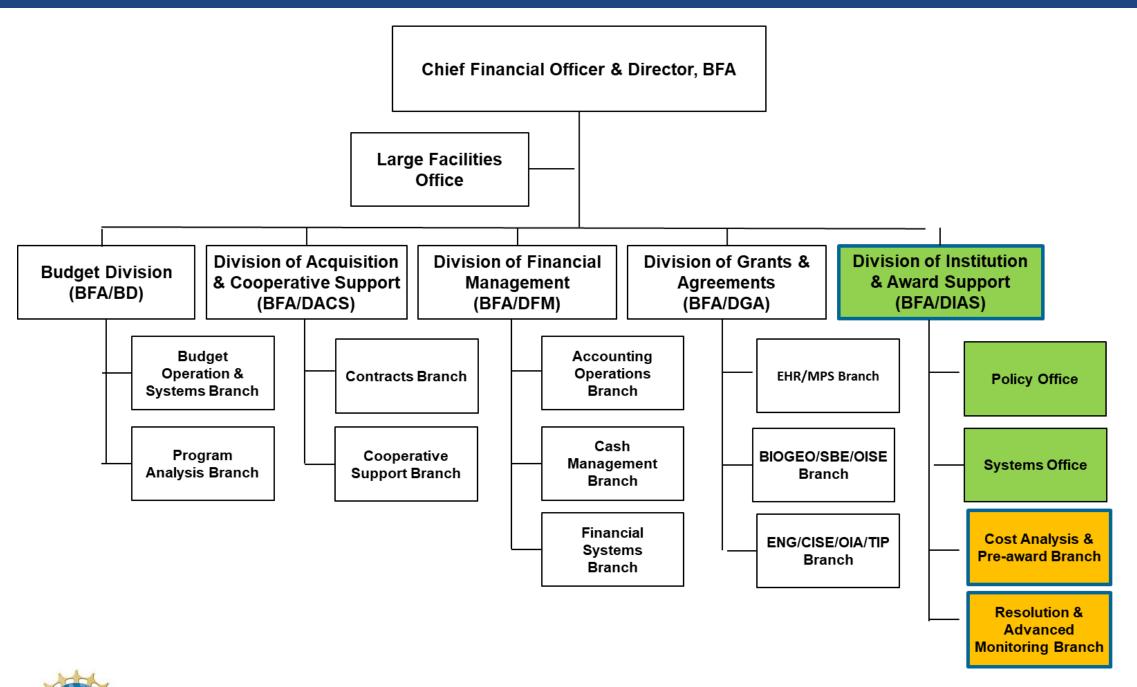
"The Proposal & Award Policies & Procedures Guide (PAPPG) is comprised of documents relating to the Foundation's proposal and award process for the assistance programs of NSF.







# Division of Institution and Award Support (DIAS)





Elizabeth "Liz" DeHart

Cost Analyst

Resolution and Advanced Monitoring Branch

edehart@nsf.gov

(703) 292-2152

# Division of Institution and Award Support (DIAS) Overview

- Oversight
- Policy
- Systems
- Cost Analysis and Pre-award Branch
- · Resolution and Advanced Monitoring Branch

# ENSURING SUCCESS TECHNICALLY & ADMINISTRATIVELY

- Scientific and Technical ability are key, but...
- Keys to Success:
  - Writing (internal controls)
  - Following (established policies)
  - Documenting (all costs charged to awards)
  - Asking (ask questions when anomalies come up)
- Prior Approvals

## FREQUENT AUDIT FINDINGS

- Subawards & Subrecipient Assessment Monitoring (2 CFR 200.331-334)
- Participant Support Costs (2 CFR 200.456)
- Allowability & Allocation of Costs (2 CFR 200.402-405, w/emphasis on: 405(d)
- If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding <u>paragraph (c)</u> of this section, the costs may be allocated or transferred to benefitted projects on any reasonable [and] documented basis
- Promotional Items (2 CFR 200.421)
- Application of Indirect Cost Rates [2 CFR 200, Appx II (IHEs) & Appx III (NPs)]
- Purchases Near or After POP (See Allocable Costs above)
- Unsupported Costs [2 CFR 200. 302(b)(2)]



# SUBAWARDS & SUBRECIPIENT ASSESSMENT & MONITORING

• The prime awardee, nor its subrecipient were able to provide supporting documentation for any of the \$250,000+ in cost share claimed under the closed EPSCoR award.

• The prime awardee claimed \$200,000 in cost sharing under the EPSCoR award related to a subaward.

Although the subrecipient was able to provide general ledger data to support it incurred \$200,000 in expenses for this award, the subrecipient did not maintain sufficient documentation to support the allowability (reasonable, allocable, and necessary) of the expenditures recorded in the general ledger.

# PARTICIPANT SUPPORT COSTS – MEALS (2 CFR 200.456)

- Costs for a "welcome lunch," where only 24 of 50 attendees were participants. Auditors questioned costs
  charged for meals of non-participants, which included awardee staff and family members of participants.
  The meals were deemed unnecessary and unreasonable for the performance of the award, and staff meals
  are typically not allowable under NSF awards
- An awardee charged an award for a "student and mentor lunch," where only 22 of 49 attendees were participants. Auditors question costs charged for meals of non-participants, including awardee students, faculty, and staff. The meals were deemed unnecessary and unreasonable for the performance of the award, and staff meals are typically not allowable under NSF awards

### PARTICIPANT SUPPORT COSTS – CONT.

### ENTERTAINMENT (200.456) & PROMOTIONAL ITEMS (200.421)

- Activities such as museum and zoo admission, yoga and gym access, and theater and movie tickets are
  typically considered to be entertainment. The EPSCoR awardee did not disclose these activities or their
  programmatic purpose; nor prior written approval (per NSF terms and conditions) obtained. Also,
  documentation supporting the costs did not verify those who attended the activities were eligible program
  participants.
- OIG questioned costs for promotional items with subrecipient and EPSCoR logos. The prime awardee also provided detailed receipts for promotional items including embroidered briefcases and engraved pens.
- An EPSCoR subrecipient purchased reusable tote bags imprinted with the name of its EPSCoR-funded summer internship program to the award, stating the bags were used as recruitment material at conferences.

## ALLOW ABILITY & ALLOCATION OF COSTS (2 CFR 200.402-405)

• In the final month of the NSF EPSCoR award's period of performance, the prime awardee charged the award for 100 percent of the costs incurred to purchase a copier. Although the budget for the award included funding for printing/copying equipment, the awardee did not receive the copier until the final two days of the award's more than 7-year period of performance.

## Resource Links

- Cooperative Agreement Definition
- NSF Prior Approval Matrix
- NSF Division of Grants & Agreements
- NSF Cost Analysis and Pre-award Branch
- NSF Resolution and Advanced Monitoring (RAM)
- DIAS Tools and Resources
- Finalized NSF Management Decisions
- •IG Promising Practices for NSF Award Management

