

ESTABLISHED PROGRAM TO STIMULATE COMPETITIVE RESEARCH (EPSCOR)

EPSCOR PI MEETING

POST AWARD MANAGEMENT

January 2026



AGENDA

RAM
OVERVIEW

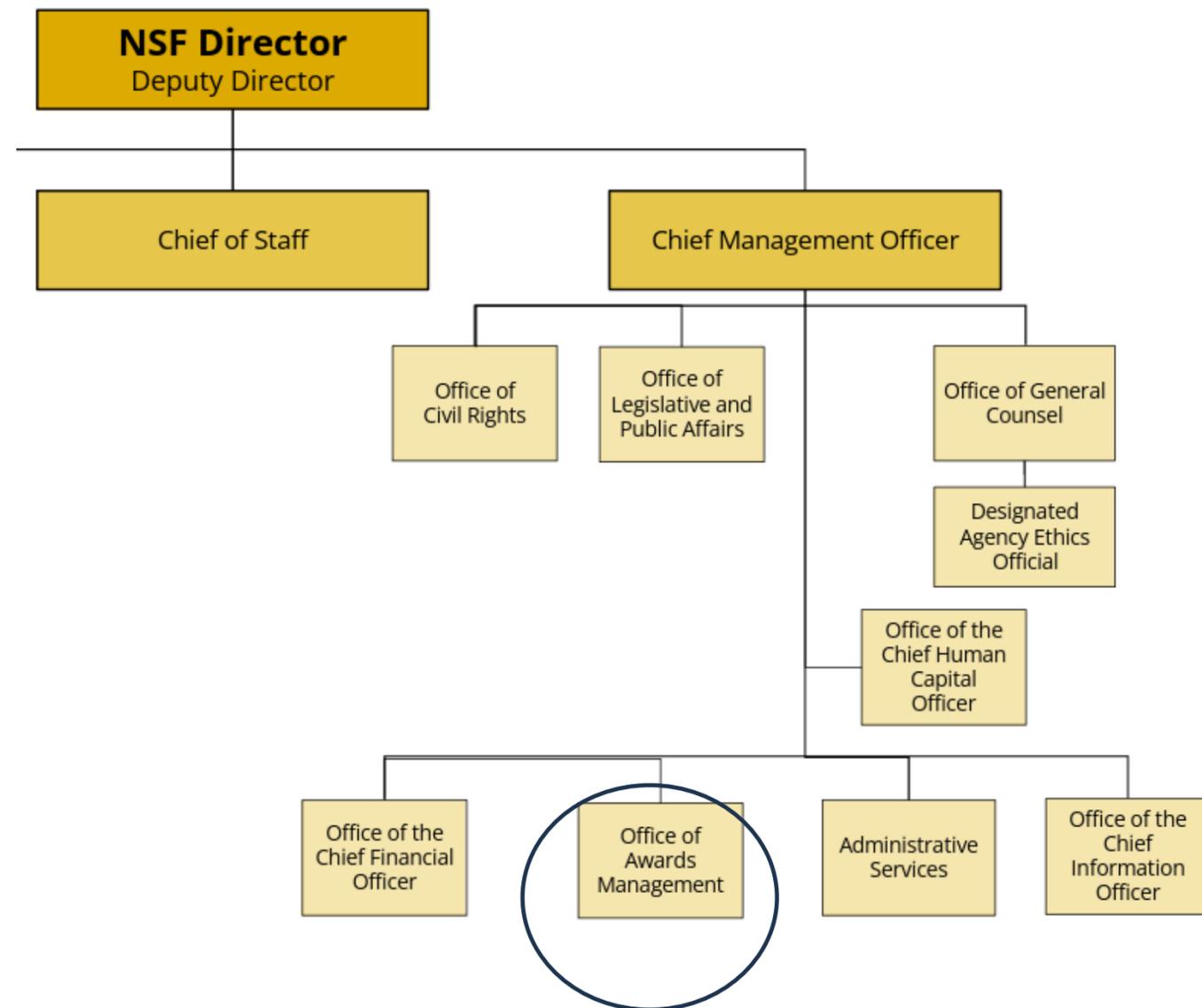
ENSURING
SUCCESS

AUDIT
FINDINGS

Q&A
SESSION



Office of Awards Management: Resolution, Appeals, and Monitoring Branch



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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 paragraph (c) 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)]



Subaward Reminders

- Subawards & Subrecipient pre-award risk assessment + regular monitoring
- Documentation
- Performance Reporting
- Indirect Cost Rate review
- Closeout + final invoicing
- FFATA reporting requirements

a. Reporting of first-tier subawards.

Applicability. Unless you are exempt as provided in paragraph d. of this award term, you must report each action that equals or exceeds \$30,000 in Federal funds for a subaward to a non-Federal entity or Federal agency (see definitions in paragraph e. of this award term). (2 CFR Appendix-A-to-Part-170 a.)



RECENT EPSCoR OIG FINDINGS: 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.



RECENT EPSCoR OIG FINDINGS: 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



RECENT EPSCOR OIG FINDINGS: 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.



RECENT EP SCOR OIG FINDINGS: 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.



New Compliance Findings

Publication Costs

PAPPG: Chapter XI: E. Publication/Distribution of Award Materials ... 4. Recipient Obligations

a. Acknowledgement of Support. Unless otherwise provided in the award, the recipient is responsible for assuring that an acknowledgment of NSF support is made:

(i) in any publication (including World Wide Web pages) of any material based on or developed under this project through use of the following language:

"This material is based upon work supported by the National Science Foundation under Award No. (NSF award number)."

§ 200.405 Allocable costs.

(c) Any cost allocable to a particular Federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons...

(d) Direct cost allocation principles: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit...



Proactive approaches: Policies and Procedures

Policies and Procedures

- Establish a routine schedule for P&P review and updates
- Engage new staff in policy/procedure review, to help you identify and correct “gaps” more easily
- Review internal SOPs to ensure they align with formal policies and procedures



Proactive approaches: Documentation

Documentation

- Get into the mindset of “how will this look to an auditor X number of years into the future?”
- Leverage your project reports: document unanticipated expenditures to demonstrate how these were essential and necessary for the project.
- Confirm any verbal confirmations/conversations with NSF staff in writing for your records...and save those confirmations!



Resources

• IG Promising Practices for NSF Award Management



NATIONAL SCIENCE FOUNDATION
OFFICE OF INSPECTOR GENERAL

AT A GLANCE

Promising Practices for NSF Award Management
Report No. OIG 22-6-002
January 21, 2022

WHY WE ISSUED THIS REPORT

Since September 2018, Cotton & Company LLP (C&C) has conducted 18 performance audits on behalf of our office of costs claimed by NSF award recipients. As part of those audits, C&C observed, identified, and cataloged strengths and opportunities for improvement within each recipient's award management environment. We then engaged C&C to write a capstone report communicating the most common audit findings, suggestions for how to improve compliance in these areas, and promising award management practices implemented by audited institutions. This

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Resources

- DIAS Tools and Resources

FACT SHEETS

- [Desk Review Fact Sheet](#)
- [Site Visit Fact Sheet](#)
- [Accounting System Review Fact Sheet](#)
- [Unallowable Costs Fact Sheet](#)

FREQUENTLY ASKED QUESTIONS

- [NSF Monitoring Desk Review FAQs](#)

TRAINING TOOLS

- [Participant Support Costs Self-Assessment Tool \(Interactive\) | Participant Support Costs Self-Assessment Tool](#)
- [Subrecipient Monitoring Self-Assessment Tool \(Interactive\) | Subrecipient Monitoring Self-Assessment Tool](#)
- [Consultant Services Self-Assessment Tool \(Interactive\) | Consultant Services Self-Assessment Tool](#)
- [Travel Costs Self-Assessment Tool \(Interactive\) | Travel Costs Self-Assessment Tool](#)

OTHER HELPFUL DOCUMENTS

- [ACM\\$ Payment Calculation Tool](#)
- [Recording Project-Related Indirect Cost Recovery Charges](#)
- [Constructing Effective Policies and Procedures](#)

MORE INFORMATION

- [2 CFR 200](#)
- [FAR Contract Cost Principles and Procedures](#)



Resources

NSF Prior Approval Matrix October 1, 2024

- [NSF Prior Approval Matrix](#)

	2 CFR 200 Reference	NSF Reference (where applicable)	Required or Waived
Prior Written Approval (prior approval)*	200.407		
Cost sharing	200.407(a)	PAPPG** Chapter VII.C	
Use of unrecovered indirect costs, including indirect costs on cost sharing	200.306(c)		Waived
Use of current fair market value to determine the value of recipient or subrecipient contributions of services and donations of property for the purposes of cost sharing	200.306(d)(2)		Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the award supports activities that require use of equipment, buildings or land	200.306(h)(2)		Required
Program Income	200.407(b)	PAPPG Chapter VIII.D.4	
Use of program income during the period of performance (additive method)	200.307(b)(2)		Waived
Revision of budget and program plans	200.407(c)		
Change in the scope or the objective of the project or program	200.308(f)(1)	PAPPG Chapter VII.B.1.a	Required
Change in Principal Investigator (PI) and any co-PIs identified by name or position on the project	200.308(f)(2)	PAPPG Chapter VII.B.2	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time and effort devoted to the project over the course of the period of performance, by the approved PI	200.308(f)(3)	PAPPG Chapter VII.B.2.a	Required
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E as applicable	200.308(f)(4)	GC-1*** Term and Condition No. 11	Waived ¹
Transfer of funds budgeted for participant support costs to other budget categories	200.308(f)(5)	GC-1 Term and Condition No. 3	Required ²
Transfer of funds into the participant support cost category	200.456	PAPPG Chapter X.A.3	Waived ³
Subaward activities not included in the proposal and approved in the award; this requirement does not apply to procurement transactions for goods and services.	200.308(f)(6)	PAPPG Chapter VII.B.4	Required



Resources

- 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



Q & A



Contact Us!

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