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National Science Foundation: Challenges, Opportunities, and Implementation of Uniform Guidance

COGR Meeting: March 5, 2015



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Speaker

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Topics

- NSF Implementation of the Uniform Guidance
- Challenges to Date
 - Frequently Asked Questions
- Future Opportunities



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NSF's Implementation of the Uniform Guidance

- 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 published the PAPPG on November 20th, with an effective date of December 26, 2014
- NSF published revised award conditions on December 18, 2014

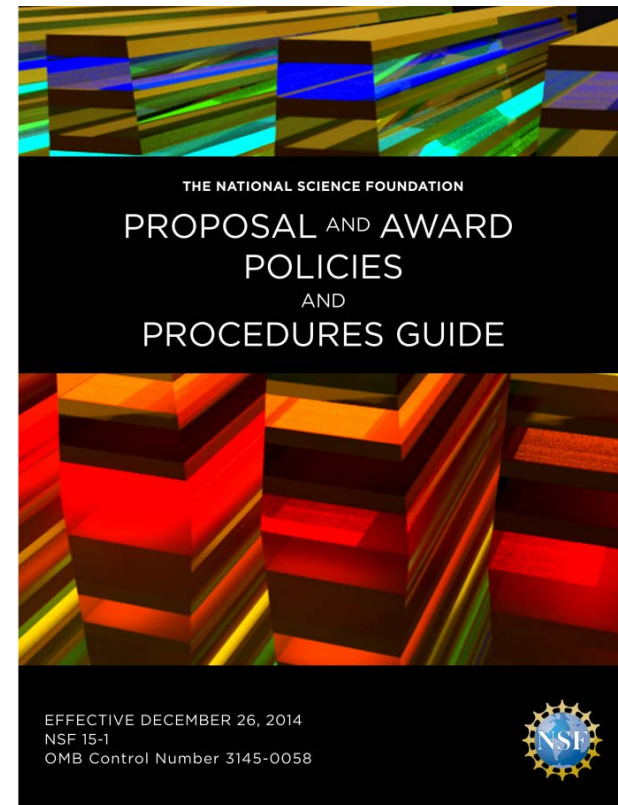


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NSF's Implementation of the Uniform Guidance is included in:

- The PAPPG; and
- NSF Grant General Conditions

Effective for new awards and funding increments issued on or after December 26, 2014



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PAPPG – Uniform Guidance Significant Changes

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



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PAPPG – Uniform Guidance Significant Changes (Cont'd)

- NSF Award Conditions
- Notifications and Requests
- Cost Sharing



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Uniform Guidance - NSF Deviation

- NSF's Implementation is consistent with the coverage contained in the Uniform Guidance, with the following exception:
 - **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



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Challenges to Date

- Ensuring program and administrative staff are up to date, and, knowledgeable about the new requirements
 - This is not new to the Uniform Guidance, but, given the number of changes, it remains a challenge
- Ensuring that the NSF proposer and awardee community are up to date, and, knowledgeable about NSF's implementation of the new requirements



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Challenges (Cont'd)

- Frequently Asked Questions
 - Which grant conditions apply to carry over funds for awards made prior to December 26, 2014, when a new increment is awarded after December 26, 2014?
 - What rules apply to non-funding amendments?
 - Will the extension from 90-120 days for expenditures, apply to awards made prior to December 26, 2014?



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Frequently Asked Questions (Cont'd)

- Indirect costs for recipients and subrecipients
 - Can less than the negotiated rate be specified on an award budget?
- Prior approval requirements specified in 2 CFR 200.407 and Article 2 of NSF's Grant General Conditions?
 - Which prior approvals is a recipient required to obtain?

A set of FAQs is under development and will be posted in the near future



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Future Opportunities

- With implementation of the new Research Terms and Conditions, NSF will have an opportunity to discuss further:
 - Notifications and requests
 - Timeline for submission of project reports
- **IT IS TOO EARLY TO PREDICT THE OUTCOME OF THESE DISCUSSIONS!!**



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For More Information.....

Ask Early, Ask Often!

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