Hot Topics in Research Administration Program

November 8, 2013

FEDERAL AGENCY UPDATES

Presenters:
Kim Gascho, Pre-Award Center Manager
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National Science Foundation

France Cordova was named the NSF Director.

It is expected that the new GPG (Grant Proposal Guide) will be issued in November with a February implementation. The expectation is there will not be a lot of changes, just updates.

Expect substantial changes due to the issuance of A-81 (expected FY15).

National Science Foundation

Some things to remember:

Results from prior support section in the description:

If the proposer has received NSF funding in the past 5 years, this information is required.

- *If the proposer has received more than one prior award, the proposer should provide the information requested for the award most closely related to the proposal.*

Information that should be included:

❖ The NSF award number, amount and period of support.

❖ The title of the project.

❖ A summary of the results of the completed work, including accomplishments, described in two separate sections, related to the Intellectual Merit and Broader Impact activities supported by the award.

❖ List of publications resulting from the NSF award.

❖ Evidence of research products and their availability, including, but not limited to: data, publications, samples, physical collections, software and models as described in any data management plan.

❖ Proposal may contain up to 5 pages in prior support information.

NIH ASSIST

- *ASSIST: Application Submission System & Interface for Submission Tracking*
- *http://grants.nih.gov/grants/webinar_docs/webinar_20130813.htm*
- *http://era.nih.gov/files/ASSIST_user_guide.pdf*

- *ASSIST allows applicants to:*
  - ❖ *Use current eRA Commons credentials to access ASSIST*
  - ❖ *Delegate application preparation responsibilities to multiple users within and outside the applicant organization while maintaining appropriate access control and security*
  - ❖ *Populate data from established eRA Commons profiles*
  - ❖ *Run validations on federal-wide and agency business rules prior to submission*
  - ❖ *Take advantage of automatic generation of the table of contents, headers, footers, page numbers, etc.*
  - ❖ *Print/preview applications in the format used by the agency prior to submission*

NIH ASSIST

Developing Your Application in ASSIST

- How are complex applications structured in ASSIST?
  - A single overall component: The overall component will have data collection comparable to a single-project application that describes the entire application and how each of the components fit together.
  - Additional Components: Some number of additional component types (e.g., Admin Core, Project, Core, FOA-specific, etc.) Funding opportunity announcements will clearly specify the types of components that will be required in complex application submissions for that opportunity.
  - Summaries: As part of the application image creation process, ASSIST will automatically generate summaries of budgets and other information compiled from the data provided in the individual components. These summaries help reviewers and NIH staff work with the application.

NIH ASSIST

Developing Your Application in ASSIST

What privileges are automatically available in ASSIST based on the role associated with the eRA Commons Account?

- Signing Official – (SO): Initiate application, Assign, modify, or revoke application access for other users, Edit entire application, Submit application

- Administrative Official – (AO): Initiate application, Edit entire application

- Principle Investigator – (PI): Initiate application, Edit entire application

Other Federal Sponsors

DOD – Sponsor is increasingly asking for specific details on budget proposal components. For example, hourly rate breakdowns, and specific travel plans including airfare, per diem, lodging, etc.

DEPARTMENT OF HEALTH AND HUMAN SERVICES

NIH SALARY CAP LIMITATION

Salary cap is the difference between what is charged and the cap which is allowed by NIH

Example (FY):

PI Salary: $250,000   NIH Cap (2011): $199,700

100% FTE

Monthly Sal: $20,833   Monthly Cap: $16,642

**Difference: $4,191 (Amt to be Cost Shared)

10% FTE

Monthly Sal: $2,083   Monthly Cap: $1,664

**Difference: $419 (Amt to be Cost Shared)

Salary Cap Spreadsheets

Things to remember:

- Direct Salary, Salary, and Institutional Salary hold the same meeting in relation to the NIH salary limitations
- Institutional Salary is the individual's annual compensation that the organization pays for their appointment
- Salary cap, as listed by NIH, is noted as FY Salary

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Current Salary Cap Limitations

- FY12 and FY13 Salary Cap – Executive Level II ($179,700 FY; $134,775 AY; Monthly Salary $14,975)

- Effective with awards issued on or after December 23, 2011.

- FY 12 funds issued prior to this date are calculated with the old Executive Level I rate of $199,700 (FY).

- Carry over funds from previous years remain at the salary limitation level in effect at the time those awards were issued.

Things to pay attention to…..

- Any change in the Salary Cap limitation will affect the amount that will need to be cost shared

- An increase or decrease in PI salary will affect the amount that will be cost shared or if Salary Cap is applicable

- Changes in the PI's effort on the project will change the cost distribution between sponsor dollars and cost share dollars

**Effort only changes the dollar amount of cost share required, not if Salary Cap is applicable

**If Salary Cap is increased, but the PI's salary stays the same, Salary Cap could cease to apply; if the PI's salary then falls under the new cap

NIH RPPR

- RPPRs (Non-Competing Continuations) are submitted via eRA Commons by SPS Post Award Staff
  - Paper submissions and submissions requiring detailed budgets are still handled by SPS Pre-Award.

- Beginning October 1, 2014, all Graduate Students and Undergraduate Students who work for 1 person month or more on a specific project will be required to have a Commons ID
  - Contact spsdhhs@purdue.edu for ID

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Public Access Compliance

- Through the new progress reporting mechanism, investigators will report publications using a My NCBI account linked to an eRA Commons account. Section C.1 will pre-populate publications from NCBI, and the PI or Sponsored Programs can check off associated publications for that particular project.

- If any citations are out of compliance with the public access policy, the grantee will receive an automated email requesting a response at least two weeks before the next budget start date. Grantees can update information via a Progress Report Additional Materials (PRAM) link.

  - In the event that a publication is non-compliance; the release of funding could be delayed or withheld

NIH's Transition to PMS Sub Accounts

- All award payments will be transitioned to PMS subaccounts by the end of FY2015
- October 1, 2013 – September 30, 2014
  - Transition of all awards with new document numbers (Type 1, 2, 4, 7, and 9) from PMS pooled accounts to PMS subaccounts
- October 1, 2014 – September 30, 2015
  - Transition all continuations (Type 5) from PMS pooled accounts to PMS subaccounts
  - What does this mean for you?
- No change to the due dates, submission, or review of progress reports

Checking for Understanding

Salary Cap:

What is the current salary cap limitation level?

$179,700 (Executive Level II)

RPPRs:

What account must be linked to the PI's Commons account in order for us report publications?

MyNCBI

PMS:

What is the difference between a pooled account and subaccounts?

Pooled accounts allowed drawdown in a lump sum.
Subaccounts require drawdown by grant.

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NSF- ACM$

- New approach to award payments and post-award financial processes which will transition financial processing of award payments from current 'pooling' methods to a 'grant-by-grant' method
- Due to increased focus on transparency and accountability in the stewardship of Federal funds

ACM$ Benefits

- Better and more timely access to financial data

- Reduced need for manual accounting processes

- Quicker identification of awardees that need technical assistance through more transparent data

NSF – 2 Month Rule

- Salary on all NSF grants cannot exceed 2 months from July to June of the same budget year unless awarded by NSF.

- http://www.purdue.edu/business/sps/postaward/sponsors/nsf/index.html

2 Month Calculator:
https://www.purdue.edu/business/sps/webapp/Calc/index.php

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NSF Technical Reports

Submitted via Research.gov

    - How to Guide: http://www.purdue.edu/business/sps/postaward/sponsors/nsf/index.html

- Research.gov Resources (new)
  - Help Guide
  - NSF RPPR Screenshots and Instruction Guide
  - Project Outcomes Report Fact Sheet

Helpful Websites

- Reports are not intended to be cumulative.
  - The last annual report is the final report.
- Project outcome reports for the general public are required.
- Only PI and CoPI can submit the report.
  - Currently working to allow authorized users access to the system to assist in completion.

Checking for Understanding

2 Months Rule

  The additional salary approved by NSF for a faculty member is entered by who?

    Sponsored Programs- Only area with access to edit this information

Technical Reports

  Should technical reports be cumulative?

    NO!!

OTHER FEDERAL SPONSORS

USDA-NIFA(National Institute of Food & Agriculture)

Responsible & Ethical Conduct of Research (RCR)

Beginning with the February 2013 agency-specific terms and conditions, NIFA/USDA requires training in responsible and ethical conduct of research. Thus, New or amended NIFA funds awarded to Purdue now require RCR training if agency-specific terms and conditions from February 2013 or later apply.

RCR training is required for all personnel on the NIFA award including faculty, staff, and students. NIFA funds cannot be expended before all project personnel complete training (including the principal investigator).

Purdue utilizes the CITI training program for RCR and other training courses. Fulfillment of this training will be monitored by OVPR regulatory staff. NIFA also expects principal investigators to keep records of this training.

TRAINING NOTES:
- Training takes approximately two hours
- Can be accessed from any location with internet access
- May be broken up into as many sessions as needed
- Training is valid for 5 years
- Quick Reference Card found at www.purdue.edu/research/vpr
- Direct any questions or specific needs to vprregulatory@purdue.edu

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Differences Between NIFA & NSF

NIFA

- **Part of the Award Terms & Conditions**

- **All Staff (including PIs)**

NSF

- **Applies to all NSF projects**

- **Requires certification at Proposal time that a plan is in place**

- **Only Post Docs, Grads & Undergrads**

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EPA

OIG Audit of STAR Grants

- Reports submitted late
- Acknowledgement & disclaimers missing
- Allocable funds questioned – Travel
- Institutions Research misconduct policies not compliant with EPA

EPA Reminder: All <u>foreign</u> travel NOT in approved budget requires prior approval

DOD

- ARO
  - Prior approval needed for Equipment not in approved budget
  - Prior approval for all foreign travel not in approved budget
  - Submission of a report 30 days after returning from all foreign travel
- AFOSR
  - Potential reduction of future funds
  - Limit of no cost extensions
    - Strong justification needed
    - Submit 30 days prior to project end date

NASA

- China Funding Restriction effective February 2012
  - Can't develop, design, plan, promulgate, implement or execute a <u>bilateral</u> policy, program or contract of any kind to participate, collaborate, or coordinate <u>bilaterally</u> in any way with China or any Chinese-owned company
  - Travel to China on NASA projects will require sponsor approval prior to travel
  - Students aren't restricted based on citizenship but are subject to restriction if they are affiliated with institutions of the People's Republic of China or a Chinese-owned company incorporated under the laws of China.
  - Memorandum of Understanding detailing restrictions must be signed by PI before agreement is signed/executed

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DOE

- No longer a member of FDP (Federal Demonstration Partnership)
- Formal request for no cost extensions 30 days prior to expiration
- Prior approval required for spending outside of budget line items greater than 25% of the total project amount
- DOE Labs are more restrictive
    - Prior approval for ALL foreign travel (even if proposed)
    - Prior approval for domestic travel if not proposed
    - Equipment is government owned & prior approval is required if it wasn't in the proposal

What is FDP?

- The Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 119 institutional recipients of federal funds.

- It's purpose is to reduce the administrative burdens associated with research grants and contracts.

- Offers a forum for individuals from universities and nonprofits to work collaboratively with federal agency officials to improve the national research enterprise.

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FDP/Sponsor Matrix

- Gives guidance on when prior approvals are needed

- The Sponsor Guidelines page is based on the high level funds so it's important to keep in mind some sponsors that fall within that fund may not follow the FDP terms

FDP Matrix/Sponsor Guidelines:

http://www.purdue.edu/business/sps/postaward/accountmgmt/priorapproval/paguidelines.html

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GM AIMS – Unallocated Restricted

	Life-To-Date Budget	Life-To-Date Expenses	Available Balance
Salaries and Wages			
Professional Salaries	746,204.32	516,293.92	229,910.40
Clerical Salaries	34,674.00	9,155.00	25,519.00
Service Salaries	103,951.00	104,341.13	(390.13)
Stipends	40,524.00	0.00	40,524.00
Total Salary and Wages	**925,353.32**	**629,790.05**	**295,563.27**
Fringe Benefits			
Grad Fee Remission	20,524.00	0.00	20,524.00
Fringe Benefits	316,347.52	225,132.60	91,214.92
Total Fringe Benefits	**336,871.52**	**225,132.60**	**111,738.92**
Total S&W and Fringe Benefits	**1,262,224.84**	**854,922.65**	**407,302.19**
Supplies and Expenses			
Computer Services	0.00	25.00	(25.00)
Communications	4,600.00	2,438.14	2,161.86
Travel	22,343.06	12,183.48	10,159.58
Participant Support	1,900.00	0.00	1,900.00
Publication / Duplic	4,500.00	2,923.78	1,576.22
Other S&E	142,691.00	144,773.98	(2,417.90)
Total Supplies and Expenses	**176,034.06**	**162,344.38**	**13,354.76**
Total Direct Costs	**1,438,258.90**	**1,017,267.03**	**420,656.95**
Total Indirect Costs	**104,053.10**	**72,759.47**	**31,293.63**
Unalloc Restr Budget	**426,220.00**	**0.00**	**426,220.00**
Total	**1,968,532.00**	**1,090,026.50**	**878,170.58**

FSSR – Unallocated Restricted

Description	Budget	Life to Date Expenses	Available Balance
Professional Salaries	746,204.32	516,293.92	229,910.40
Clerical Salaries	34,674.00	8,714.82	25,959.18
Service Salaries	103,951.00	102,434.08	1,516.92
Stipends	40,524.00	0.00	40,524.00
Total Salaries & Wages	925,353.32	627,442.82	297,910.50
Grad Fee Remission	20,524.00	0.00	20,524.00
Fringe Benefits	316,347.52	224,989.61	91,357.91
Total Benefits	336,871.52	224,989.61	111,881.91
Computer Services	0.00	25.00	25.00-
Communications	4,600.00	2,438.14	2,161.86
Travel	22,343.06	11,941.93	10,401.13
Participant Support	1,900.00	0.00	1,900.00
Publication / Duplic	4,500.00	2,923.78	1,576.22
Other S&E	66,167.00	91,267.39	25,368.49-
Total Supplies & Expenses	99,510.06	108,596.24	9,354.28-
Total Direct Costs	1,361,734.90	961,028.67	400,438.13
Indirect Costs	104,053.10	72,797.91	31,255.19
Total Sponsor Available	1,465,788.00	1,033,826.58	431,693.32
Unalloc Restr Budget	426,220.00	0.00	426,220.00
Total Sponsor Costs	1,892,008.00	1,033,826.58	857,913.32

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GM AIMS

How to identify a salary cap sponsored program

Sponsored Program: 8000051370

Grant:	105523	
Title:	Design & Synthesis of Nonpeptide Protease Inhibitors	
Sponsored Program Responsible Cost Center:	4018004000 - Chemistry	
Grant Status:	Award	User Status:
Grant External Fund:	41020000 - D.H.H.S.	Co-PI Name:
Sponsor:	Phs-Nih Nat Inst Of General Medical Sci	Prime Sponsor:
Cost Sharing:	N	F&A Rate:
Program Description:	Ghosh Salary Cap (ELII)	Sponsored Prog

Federal Agency Updates – Q&A from 11/08/11 presentation

1. **NIH ASSIST: If you lose a collaborator mid-proposal, can that person be replaced with another individual?** Yes. You can continue to make changes to the senior/key personnel component as long as you have edit access: http://era.nih.gov/files/ASSIST_user_guide.pdf
2. **Has Pre-Award seen an increased need to provide additional COI information at proposal time?** No. We have been asked for more certifications at submission time confirming that we have a COI process in place.
3. **In regards to RPPR submissions, how is a person month determined?** To calculate person months, multiply the percentage of the effort associated with the project times the number of months of the appointment. For example:
   a. 25% of a 9 month academic year appointment equals 2.25 (AY) person months (9 x 0.25 = 2.25)
   b. 10% of a 12 month calendar appointment equals 1.2 (FY) person months (12 x 0.10 = 12)
4. **Can SPS clarify how NIH Non-Competing Renewals will be handled under the new subaccount system?** SPS is awaiting additional feedback from NIH before official guidance will be issued. We expect to have communication prepared near the end of FY 2014.
5. **Who is responsible for knowing if a company becomes incorporated under the laws of China?** The PI is responsible for monitoring. He/she signs an MOU as acknowledgement that this restriction applies to the project before the agreement is signed and awarded.
6. **What are the expectations of the business office regarding Salary Cap?** It is expected that the business offices utilize the NIH Salary Cap spreadsheets to ensure that payroll is posting appropriately between the sponsored and cost share accounts. Since SPS is providing completed spreadsheets to the business office at the end of each PAR period, these should be utilized to verify that actuals have posted as the business office originally intended.
7. **Are NIH Salary Cap reminders still being sent?** SPS will initiate a reminder via a B@P announcement once business offices have been notified that PARs are ready for distribution.