Highlights for Faculty and Administrators

• Funding Opportunities
  – Agencies must post opportunities at least 60 days prior to a deadline for submission
  – No opportunity should be available for less than 30 days

• Terms and Conditions
  – Research Terms and Conditions (formally known as the FDP Terms and Conditions) expire 12/26/14
  – FDP will form a working group to implement new research terms and conditions based upon the Uniform Guidance
  – Officials from NIH and NSF have made it clear that expanded authorities will be included in their implementation of the guidance

• Conflict of Interest
  – Requires all federal agencies to adopt COI policies
Highlights for Faculty and Administrators (cont.)

• Performance Data
  – Requires federal agencies to relate financial data to performance requirements

• Internal Controls
  – More emphasis placed on internal controls
  – Heavily emphasized throughout the guidance

• Compensation-personal services
  – Provide more flexibility for awardees to implement methods to certify salary and wage charges (payroll certification) and/or certify activity/effort
Highlights for Faculty and Administrators (cont.)

• Cost Sharing
  – Clarifies that voluntary committed cost share isn’t allowed
  – Mandatory cost share requirements must be stated in the RFA
  – Provides guidance for valuation of third party cost share and unrecovered F&A as cost share
Highlights for Faculty and Administrators (cont.)

• Supplies Costs—Computing Devices
  – Are an allowable direct cost provided that the device is essential and allocable to the performance of the project

• Participant Support Costs
  – Standard exemption category for modified total direct costs
  – NSF’s definition is use in the guidance

• Administrative Salary Costs
  – Are an allowable direct cost provided they are allocable and necessary for the project
  – Cost must be explicitly included in the budget and budget justification and approved by the federal agency
  – Prior approval is required to charge administrative costs after award
  – NIH will provide guidance for modular budgets.
Highlights for Faculty and Administrators (cont.)

• Subawards and Subrecipient Monitoring
  – Increased administrative burden
  – Requires that pass through entities (prime awardees) make a documented determination regarding the classification of an entity as a subrecipient or contractor (i.e. vendor)
  – Indirect costs
    • Pass through entities must:
      – Honor the subrecipient’s federally negotiated indirect cost rate
      – Negotiate an indirect cost rate
      – Use a de minimus indirect cost rate of 10% modified total direct costs

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Highlights for Faculty and Administrators (cont.)

Subawards and Subrecipient Monitoring (cont.)

- Subrecipient risk assessments are required to determine appropriate monitoring
  - Examples of factors used to assess risk
    - Previous experience as a federal awardee or subawardee
    - Audit review (either A-133 audit or independent auditor report)
    - Review of financial systems and internal controls

- Monitoring required during the project period
  - Documented review of financial and programmatic reports
  - Greater emphasis on detecting and addressing deficiencies (i.e. slow or no performance, financial management issues, slow or no spending etc.)

- Management decisions must be issued when the subrecipient has audit findings

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Highlights for Faculty and Administrators (cont.)

• Closeouts
  – All reports due no later than 90 calendar days after the award end date
  – New pressure on agencies to ensure closeout compliance (compliance focus currently)
  – Enforcement techniques may include:
    • Withholding future awards
    • Inability to draw down funds beyond 90 calendar days after the award end date