

COMPLIANCE CORNER

MRAM

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RAA/Post Award Fiscal Compliance (PAFC)

NSF PAPPG Jan 2017

(Proposal and Award Policy & Procedure Guide)

- Primary changes were cosmetic
- Restructured pre and post into a single document
- Refined some language to add clarity
- Added additional links to the Uniform Guidance

https://www.nsf.gov/pubs/policydocs/pappg17_1/index.jsp

Chapter II

Proposal Budgeting

- Information on incentive payments, for example, payments to human subjects or incentives to promote completion of a survey.
 - Included on line G6 (other) of the NSF budget and
 - Indirect cost assessed in accordance with rate agreement
 - *NOTE: not considered Participant Support costs*
- Domestic Travel, has been revised to inform proposers that travel, meal and hotel expenses of grantee employees who are not on travel status are **unallowable**.
 - *Follow institutional policy in determining if in travel status.*
 - *Meals included in conference registration fee are ok.*

Chapter II

- Indirect (F&A) costs has been updated to clarify that the use of an indirect cost rate lower than the organization's approved negotiated indirect cost rate is considered a violation of NSF's cost sharing policy.
 - *F&A waivers may disqualify a proposal*
 - *Watch split rates on awards less than \$250K*
- Voluntary Committed and Uncommitted Cost Sharing has clarifying language.
 - *In accordance with the Uniform Guidance, in order to be considered voluntary committed cost sharing, the amount must appear on the NSF (proposal) budget, **and** be specifically identified in the approved (funded) NSF budget.*
 - *Voluntary uncommitted cost sharing, however, should not be included in the proposal budget or budget justification and these resources are not financially auditable by NSF.*

Chapter VI

NSF Awards

NSF-Approved Extension, has been updated to clarify that a request for an NSF-approved extension **should be submitted at least 45 days prior to the end date of the grant** and must be signed and submitted by the Authorized Organizational Representative (AOR).

For grantee approved no-cost extensions we must notify NSF 10 days prior to the grant end date. The above requirement is addressing a second, third, etc. no-cost extension where sponsor approval is required.

Chapter VIII

Grant Administration

Award Financial Reporting Requirements and Final Disbursement, has been supplemented with a new subpart, E.6.

Funds will no longer be available for expenditure for any purpose beyond September 30th of the fifth fiscal year after the expiration of a fixed appropriation's period of availability for incurring new obligations.

Chapter VIII

Award Financial Reporting Requirements and Final Disbursement, has been updated to inform grantees of the time limits applicable to the upward or downward adjustments.

- Upward adjustments may be submitted through ACM\$ for up to 15 months after the financial closeout. (Additional Expenditures)
- Downward adjustments may be submitted through ACM\$ until the appropriated funding for the award cancels. (Refunds)

Chapter X

Allowability of Costs

- Pre-Award (Pre-Start Date) Costs, includes an additional footnote reminding grantees that in the case of a renewal award, **costs incurred under the old grant cannot be transferred to the new grant.**
- Pre-award expenditures prior to funding of an increment within a continuing grant are not subject to this limitation or approval requirement.

Chapter X

Administrative and Clerical Salaries & Wages language has also been added to clarify that an AOR should initiate the request for NSF approval to direct charge salaries of administrative or clerical staff after an award has been made.

NSF Audit Update

We are still responding to NSF management's questions concerning the costs we believe should not be disallowed.

Hope to have a final resolution by year end.