

Research Administrators BILAT 4.0 Workshop on US Funding



Agenda

- Proposal Development and Submission
- MTDC – Modified Total Direct Cost
- FCOI
- FFATA – Executive Compensation Certification
- F&A
- Fly America
- Subawards/Subcontracts – Compliance

Proposal Development & Submission

Parallel Session for Researcher Administrators



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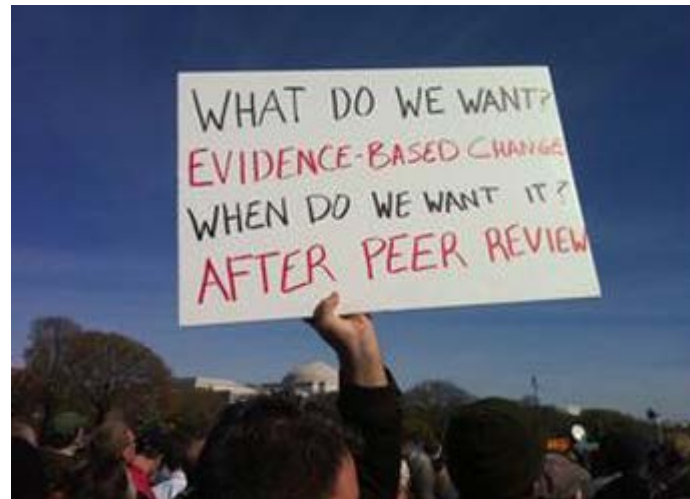


“My project is simply this. I want to find out once and for all whether there’s any truth in the belief that money can’t buy happiness.”

DEVELOPING TECHNICAL CONCENTRATION

What is grantsmanship?

The art of writing a proposal (or request) for support which successfully advocates for a particular line of inquiry, research or investigation while aligning with a funder's mission, ethos or interests.



DEVELOPING TECHNICAL CONCENTRATION

Ok, that helps with “*advocacy for a particular line of research,*” but what about “*aligning with funder’s mission, ethos and interests*”?

1. Identify mission of agency/funder – *what are they all about?*
2. Address specific FOA/RFP criteria
3. “Selling points”
 - Technical Expertise
 - Institutional Resources
 - Societal Benefit

Bottom Line: Self promotion can be difficult.

DEVELOPING TECHNICAL CONCENTRATION

Best practices of Grantsmanship

ELEMENTS:

- Abstract – *Be Explicit.*
- Impact Statement – *Who cares?*
- Project Narrative –
 - *Introduction*
 - *Background*
 - *Problem Statement*
 - *Significance*
 - *Evaluation*
- Budget – *Reasonable*
- Timeline/ Gantt



TIPS for SUCCESS:

- *Write the abstract and introduction last.*
- *Careful with titles – be as explicit as possible.*
- *Assume sophisticated peer readers but may not be in exact niche field.*
- *Write for skeptics*
- *Preempt reviewer questions*
- *Reviewers make up minds quickly*
- *Writing style – declarative, short sentences.*
- *Include a cover letter where a specific peer-review panel or section is requested.*

DEVELOPING TECHNICAL CONCENTRATION IMPACT STATEMENTS

Broader Impacts

How well does the activity advance discovery and understanding while promoting teaching, training and learning?

How well does the proposed activity broaden the participation of underrepresented groups (e.g., gender, ethnicity, disability, geographic, etc.)?

To what extent will it enhance the infrastructure for research and education, such as facilities, instrumentation, networks and partnerships?

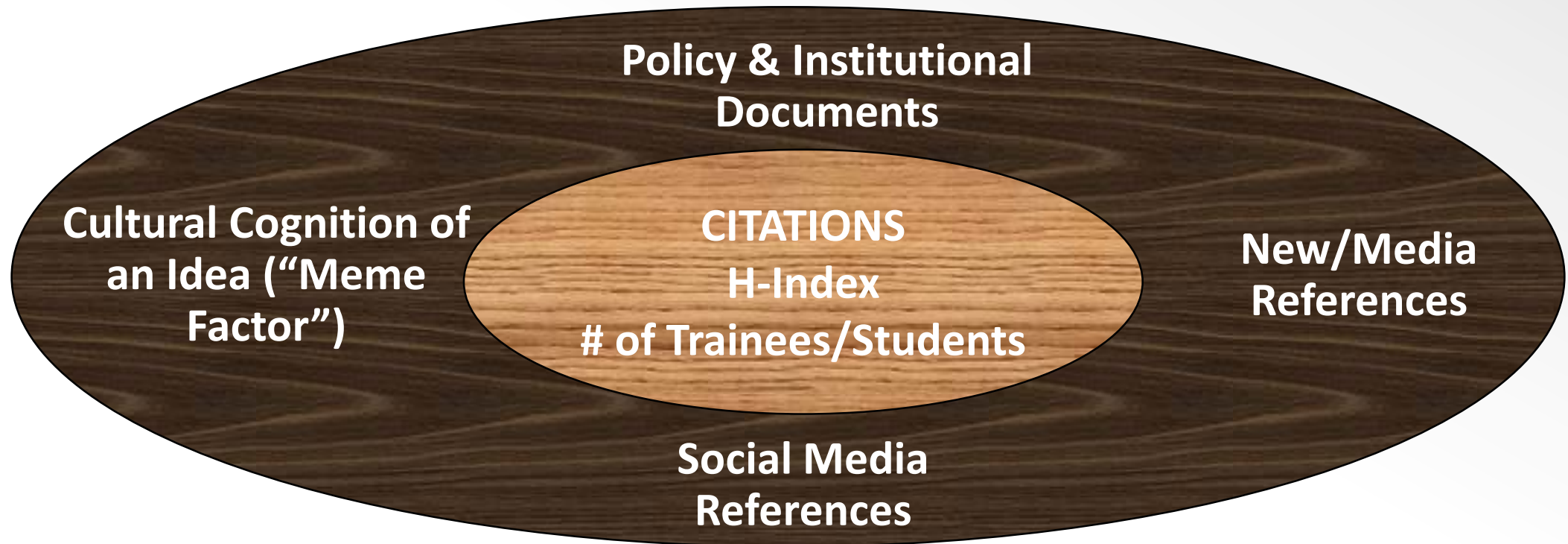
Will the results be disseminated broadly to enhance (scientific, technological, etc.) understanding?

What may be the benefits of the proposed activity to society?

DEVELOPING TECHNICAL CONCENTRATION IMPACT STATEMENTS

Broader Impacts

Measurement of Impact



DEVELOPING TECHNICAL CONCENTRATION

ADDITIONAL TIPS

- Use “editing services” and/or colleagues to review
- Pay attention to formatting
 1. Biosketches/CVs
 2. Mentoring Plans
 3. Letters of Support
- Relationship building with Program Officer (PO) is KEY!!
- Based on the agency, find out who makes the funding decision. For example NSF, peer-review panel meets and makes recommendation, but PO makes actual decision. NIH is different – funding decisions are based on a point scheme earned by peer-review panel.
- Faculty commonly afraid of making missteps or mistakes – but shouldn’t be!
- DON’T ask questions that are already addressed in RFP/FOA

DEVELOPING TECHNICAL CONCENTRATION

ADDITIONAL TIPS

- Researchers should review funded abstracts.
 - Often available online – i.e. REPORTER (NIH), NSF database.
- REPORTER is a great tool to use during Proposal development:
 1. what fits within the agency's mission
 2. view assignments for study sections (always complete this “requested study sec “ in proposal; don't assume CSR will assign it correctly)
 3. view funded abstracts.
- Pay Careful Attention to Titles:
 1. Should be descriptive enough to indicate the topic of proposal
 2. Avoid clever taglines or other aspects.

DEVELOPING TECHNICAL CONCENTRATION

ACTIONS TO AVOID

- Act like the funder owes you
- Act like the funder owns you
- Fail to do homework
- Get lost between money and goal
- Claim unmitigated success
- Too-aggressive cultivation
- Not asking for or ignoring feedback
- Over-reliance on jargon

Sources:

<http://www.hewlett.org/friday-note-pitch-persuasive-or-how-to-maybe-get-a-grant/>

<http://www.hewlett.org/friday-note-pitch-imperfect-or-how-not-to-get-a-grant/>

Basic Application Components

Cover sheet

Abstract or
project
summary

Statement of
work

Budget

Budget
Justification

Biosketch

Current &
Pending
Support

Required
Approvals

Resources

Checklist



Statement of Work

Specific Aims

- Should answer questions about the research being proposed.

Why

- Is this research being studied?

Who

- Will be studied?

What

- Will be studied?

How

- Will it be studied?

When

- Will it be studied?

Where

- Will it be studied?

Proposal Planning, Developing, Submitting

Encourage preparation of preliminary proposals



Facilitate contact with potential Sponsors



Provide proposal preparation guides and tools



Offer targeted workshops



Interpret proposal guidelines



Assist with proposal submission

Formal Proposal Components

Title/cover page

Abstract

Narrative

- Needs/Significance
- Literature Review
- Methodology
- Evaluation

Personnel Vitae

Detailed budget with justification

Facilities/resources available

Appendices

Formal proposals are constructed according to sponsor guidelines.



Standard Direct Cost Elements MTDC Detailed Budget

- Salaries and wages
- Fringe benefits
- Equipment
- Expendable supplies and materials
- Travel

- Consultants
- Subcontracts

- Other
 - Contractual services
 - Tuition Remission

Budget Construction and Review

Salaries and Wages/Fringe Benefits

- Faculty investigators: follow institutional policy on academic year and summer salary
- Postdoctoral Fellows
- Undergraduate and graduate students
- Technical and clerical support, as justified
- Use percent of effort or person-months, not hourly wage
- Fringe Benefits
 - Use correct rates (adjust for annual changes)
- **Include cost of living, merit, and promotion adjustments*

Budget Construction and Review

Travel

- Adhere to institutional policy and agency guidelines
- Distinguish between domestic and foreign travel
- If foreign travel is sponsored by the federal government, use federal international per diem rates

Equipment

- Be aware of sponsor and institutional differences in definition of equipment (capitalization threshold)
- Be aware of fabrication costs

Other Direct Costs

- Materials and Supplies
- Participant Support Costs
- Other....

Subawards and Consultants

- Subawards / Subcontracts:
 - Proposed costs should be reasonable and allowable
 - Authorized sub representative should sign the sub proposal
- Consultants should sign a letter of confirmation
 - Consultant should sign a confirmatory letter

ASK QUESTIONS to ensure you understand the PI's needs.

Excluding needed costs or mis-categorizing costs can cause problems post award.



Special Budget Considerations for NIH: Salary Limits

NIH salary cap on grants, contracts and cooperative agreements is part of NIH's annual appropriation from Congress

Effective 1/1/15 limitation: \$183,300 per year for 100% effort (tied to Federal Executive Schedule, Level II)

Consultants are exempt, but payments must meet the test of reasonableness

Could be imposed by other sponsors as well

Institutional salary may be supplemented with non-federal funds



NIH Salary Limits

Proposals reflect actual institutional base salary:
Example

	Gross	With Cap
Salary	\$225,000	\$183,300
Effort	50%	50%
Requested	\$112,500	\$ 91,650
Benefits (25%)	\$ 28,125	\$ 22,913
F&A (47%)	<u>\$ 66,094</u>	<u>\$ 53,845</u>
Total	\$206,719	\$168,408



Budget: Summary of General Points

Include both direct and F&A costs

Should be detailed (at least in first year)

Include only allowable costs

As required, include matching or cost-sharing (if cost-sharing is proposed it should be proportional between direct and F&A)

Example NIH Budget Page

Budget Form and Principal Investigator's Budget Guide

**BUDGET FOR ENTIRE PROPOSED PROJECT PERIOD
DIRECT COSTS ONLY**

BUDGET CATEGORY (Title X)	TOTAL BUDGET (Total) See Instructions Page 5	2nd ADDITIONAL YEAR OF BUDGET (Y2014-2015)	3rd ADDITIONAL YEAR OF BUDGET (Y2015-2016)	4th ADDITIONAL YEAR OF BUDGET (Y2016-2017)	5th ADDITIONAL YEAR OF BUDGET (Y2017-2018)
PERSONNEL - Salaries and Wages Benefits, Appointments, etc. (Y2014-2015)					
CONSULTANT COSTS					
DOCUMENT					
REPRINTS					
TRAVEL					
PROFESSIONAL FEES					
EQUIPMENT (Y2014-2015)					
ALTERATION AND REVISIONS					
OTHER EXPENSES					
OTHER CONTRACTUAL COSTS					
SUBTOTAL DIRECT COSTS (Same as Title X Page 4)					
PER CONTRACTUAL COSTS					
TOTAL DIRECT COSTS					
TOTAL DIRECT COSTS FOR ENTIRE PROPOSED PROJECT PERIOD					\$

ALSO CHECK: For further budget guidelines, please refer to the Budget Guide.



Example NSF Budget Page

		YEAR 1	
		FOR NSF USE ONLY	
ORGANIZATION	PROPOSAL NO.	DURATION (M)	
Your Organization goes here		Proposed	Granted
PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR	AWARD NO.	Funds Granted by NSF	
A. SENIOR PERSONNEL: PI/PI, Co-PI'S, Faculty and Other Senior Associates (List each separately with title, A.7. show number in brackets)		NSF Funded	
		Person-months	
0.	First Name M Last Name Title	CAL	ACAD SUMR
1.	FirstNamePI X LastNamePI Title	0.00	0.00 0.00
(1) TOTAL SENIOR PERSONNEL (1-6)		\$0	
B. OTHER PERSONNEL (SHOW NUMBERS IN BRACKETS)			
1.	0) POST DOCTORAL ASSOCIATES	0.00	0.00 0.00
2.	0) OTHER PROFESSIONALS (TECHNICIAN, PROGRAMMER, ETC.)	0.00	0.00 0.00
3.	0) GRADUATE STUDENTS		
4.	0) UNDERGRADUATE STUDENTS		
5.	0) SECRETARIAL - CLERICAL (IF CHARGED DIRECTLY)		
6.	0) OTHER		
TOTAL SALARIES AND WAGES (A+B)		\$0	
C. FRINGE BENEFITS (IF CHARGED AS DIRECT COSTS)		\$0	
TOTAL SALARIES, WAGES AND FRINGE BENEFITS (A+B+C)		\$0	
D. PERMANENT EQUIPMENT (LIST ITEM AND DOLLAR AMOUNT FOR EACH ITEM EXCEEDING \$5,000)			
equipment item 1 \$0			
TOTAL EQUIPMENT		\$0	
E. TRAVEL			
1. DOMESTIC (INCL. CANADA, MEXICO AND U.S. POSSESSIONS)		\$0	
2. FOREIGN		\$0	
F. PARTICIPANT SUPPORT COSTS			
1. STIPENDS \$0			
2. TRAVEL \$0			
3. SUBSISTENCE \$0			
4. OTHER \$0			
(0) TOTAL NUMBER OF PARTICIPANTS		\$0	
G. OTHER DIRECT COSTS			
1. MATERIALS AND SUPPLIES		\$0	
2. PUBLICATION COSTS/DOCUMENTATION/DISSEMINATION		\$0	
3. CONSULTANT SERVICES		\$0	
4. COMPUTERS SERVICES		\$0	
5. SUBAWARDS		\$0	
6. OTHER		\$0	
TOTAL OTHER DIRECT COSTS		\$0	
H. TOTAL DIRECT COSTS (A THROUGH G)		\$0	
I. INDIRECT COSTS (SPECIFY RATE AND BASE)			
Name of indirect cost item Amount Rate			
FirstIndirectCostItem \$0 0.00% 0			
TOTAL INDIRECT COSTS		\$0	
J. TOTAL DIRECT AND INDIRECT COSTS (H+I)		\$0	
K. RESIDUAL FUNDS (IF FOR FURTHER SUPPORT OF CURRENT PROJECTS SEE GPG II.D.7.j.)		\$0	
L. AMOUNT OF THIS REQUEST (J) OR (J MINUS K)		\$0	
M. COST SHARING: PROPOSED LEVEL		AGREED LEVEL IF DIFFERENT \$	
PI/PI NAME DATE		FOR NSF USE ONLY	
PIFullName 1/1/1999		INDIRECT COST RATE VER	
ORG. REP. NAME DATE		Date Checked Date Rate	
InstRepFullName 1/1/1999			



Certifications, Representations, & Assurances

Other public policy requirements include:

- Lobbying
- Debarment and Suspension
- Delinquent Federal-Debt
- Drug-Free Workplace
- Drug and Alcohol Free Schools
- Trafficking in Persons
- Plus individual agency requirements

Additional Certifications required for contracts

- Procurement Integrity
- Equal Employment Opportunity
- Utilization of Small and Small Disadvantaged Business Concerns
 - >\$650,000 – small business contracting plan required prior to contract award
- Certificate of Current Cost and Pricing Data
 - Submit with best and final offer



Certification Signatures

Authorizing Official: Chief Executive or those delegated authority

Supported by internal approvals and signatures: PI, department, dean, business officers

Signature indicates acceptance of requirements

Program guides/forms provide more info on regulatory requirements (including PI responsibilities)



Internal Review Form: Typical Areas Addressed

Intellectual property

Space needs

Renovation requirements

Cost sharing/matching

Human use review and approval

Animal use review and approval

Recombinant DNA review and approval

Conflict of interest

Debarment/suspension

Lobbying

Export control and foreign national restrictions



Checklist for Proposal Review

Page limitations
Type size limitation
All elements of proposal included
Correct rates used
Budget correct
Signatures
Subcontractor commitment letter
All certifications included

If RFP, is exception letter needed?
If foundation/corporation, is it on "restricted" list?
Requirement for state review ascertained
Correct number of copies, deadline date, mailing address
Method of transmittal, packaging instructions
Limitation on number of proposals from institution



Electronic Proposal Submission

Grants.gov

- Currently lists all federal financial assistance opportunities
- Intended to be a common face to the government for submission of financial assistance applications
- Eventually all federal financial assistance applications will be submitted via Grants.gov

NSF FastLane

- Proposal Review
- Proposal Preparation & Submission
- Checking Proposal Status

NIH eRA
Commons

- Electronic Streamlined Noncompeting Award Process (RPPR)



Post-Proposal Submission: Follow Up

Document that proposal has been received and accepted

If requested, check on the status of the proposal

If necessary, prepare a revised budget

If necessary, provide “just-in-time” documentation

If successful, congratulate the Principal Investigator

If not successful, offer to review proposal and reviewers comments



Standard Direct Cost Elements MTDC Detailed Budget

- Salaries and wages
- Fringe benefits
- Equipment
- Expendable supplies and materials
- Travel

- Consultants
- Subcontracts

- Other
 - Contractual services
 - Tuition Remission

Example:
Modified Total Direct Cost Base (MTDC)

Salaries	\$100,000
Benefits	25,000
Equipment	10,000
Supplies	2,000
Subcontract (single)	40,000
Other	<u>5,000</u>
Total Direct Costs	\$182,000
F&A @ 50%	<u>78,500</u>
Total	<u>\$260,500</u>

MTDC Base* $50\% \times (\$182,000 - 10,000 - 15,000) = \$78,500$

*Exclusions: equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and portion of each subaward in excess of \$25,000.

FCOI – Financial Conflict of Interest

Existing federal regulations regarding the financial conflicts of interest (FCOI) of investigators require reporting on such conflicts to promote accountability, add transparency, enhance compliance and improve oversight on the institutional level. The regulations establish standards that provide a reasonable expectation that the design, conduct and reporting of research will be free from bias resulting from investigator financial conflicts of interest.

https://era.nih.gov/services_for_applicants/other/fcoi.cfm



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"What conflict of interest?!
I work here in my spare time."

BILAT
USA 4.0

FFATA Reporting

History

- Federal Funding Accountability and Transparency Act (FFATA) of 2006 (Public Law 109-282)
- FFATA was amended by the Government Funding Transparency Act of 2008 (Public Law 110-252)



FFATA Reporting

Discretionary Award Types

- New

Non-Discretionary Award Types

- Block Grants
- Formula Grants
- Entitlement Grants
- Earmark Grants

Who is required to Report

- Pass Through Entity (PTE/Prime Recipient)



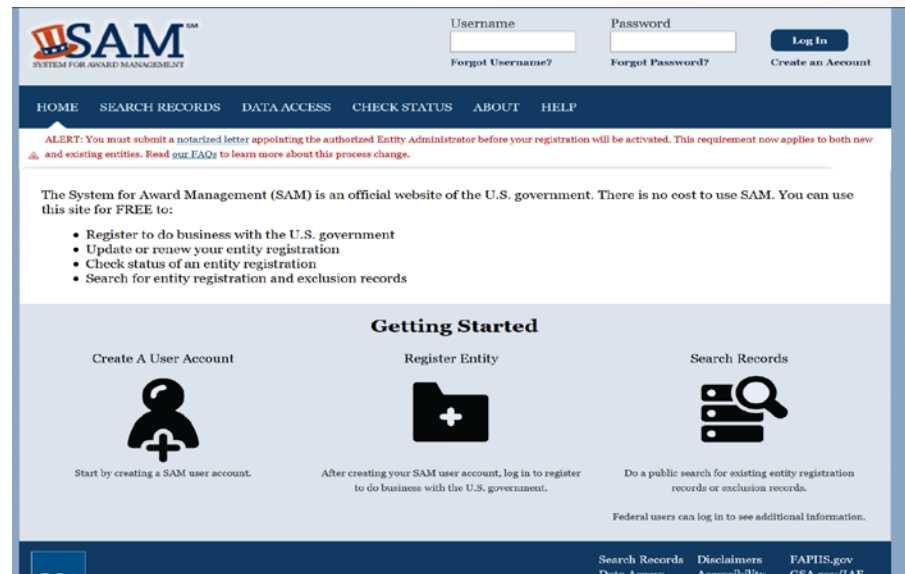
FFATA Reporting

- What should be reported
 - Basic information on first-tier subawards of \$25,000 or more
 - Total compensation for each of the recipient's and
 - Subrecipient's five (5) most highly compensated executives for the preceding completed fiscal year IF..
 - 80% or more of its annual gross revenues from the Federal Government; and
 - those revenues are greater than \$25M annually; and
 - the public does not have access to the executive compensation information.



Executive Compensation

- If your Institution meets the criteria of the requirement to report Executive Compensation
 - Prime recipients report their own executive compensation, if required, as part of their profile at www.sam.gov (formerly CCR).



FFATA REPORTING SUBAWARDS

- Pass Through Entity (PTE/Prime recipients) report subaward information at www.fsrs.gov
- All subaward information must be submitted end of the month following the month in which the PTE issued the subaward.

(e.g. 3/7/18 award must be reported by 4/30/18)

- Data is tracked: Public website: www.usaspending.gov

Home

Log-In or Register Now:

FEDERAL GOVERNMENT | AWARDEES

Important Password Update - Users and Interfacing Systems must reset their passwords as required every 90 days or the account will be disabled IAW GSA IT Security Policy, (CIO P 2100.1). Registered users will receive an email notification to remind them of this requirement. If your account has been disabled, contact the Federal Service Desk at 866-606-8220 (Monday - Friday 8 a.m. to 8 p.m. ET).

NOTE: If your account was re-enabled after contacting the FSD, you must reset your password before midnight on the day of the call to prevent it from being disabled once again.

Important Threshold Update - Effective October 1, 2015, the Department of Defense (DOD), General Services Administration (GSA), and National Aeronautics Administration (NASA) are issuing FAR Case 2014-022 as a final rule amending the Federal Acquisition Regulation (FAR) to implement the inflation adjustment of acquisition-related dollar thresholds.

Please use Internet Explorer 6.0+, Mozilla Firefox 2.0+, or Apple Safari 3.0+ to access FSRS.

Documents

User Guides

- » FSRS Awardee Guide

Training Materials

- » FSRS Awardee User Demonstration

News

Question of the Month: Who is required to file a FFATA report in FSRS? [View the answer](#)

New! As of October 29, 2010, FSRS.gov now supports both contracts and grants sub-award reporting. Prime awardees, [click here](#) to register or log-in.

Viewer Software: Some documents linked from this page are in PDF, Flash, or PowerPoint format. To view these files, you may need to download:

- » [Adobe Acrobat Reader](#)
- » [Adobe Flash Player](#)



Fly America

- Federal travelers are required by 49 U.S.C. 40118, commonly referred to as the "Fly America Act," to use U.S. air carrier service for all air travel and cargo transportation services funded by the U.S. government. One exception to this requirement is transportation provided under a bilateral or multilateral air transport agreement, to which the U.S. government and the government of a foreign country are parties, and which the Department of Transportation has determined meets the requirements of the Fly America Act.
- The U.S. government has entered into several air transport agreements that allow federal funded transportation services for travel and cargo movements to use foreign air carriers under certain circumstances.
- There are currently four bilateral/multilateral "Open Skies Agreements" (U.S. Government Procured Transportation) in effect is located at:

<https://www.gsa.gov/policy-regulations/policy/travel-management-policy/fly-america-act>



Issuing a Subaward –Consultant/Vendor or Subrecipient?

Factors to consider in making a determination

- Vendor
 - Provides goods and services within normal business operations
 - Provides similar goods and services to many different purchasers
 - Operates in a competitive environment
 - Provides goods or services that are ancillary to the operation of the Federal program
 - Is not subject to compliance requirements of the Federal program
- Subrecipient (Subaward)
 - Has its performance measured against whether the objectives of the federal program are met
 - Has responsibility for programmatic decision-making
 - Has responsibility for adherence to applicable federal program compliance responsibilities
 - Uses the federal funds to carry out a program of the organization as compared to providing goods and services for a program of the pass-through entity



Issuing a Subaward – Is it a Consultant/Vendor or Subrecipient?

Questions to ask the PI to distinguish between a consultant or subawardee relationship:

- Did the individual/organization help develop the Scope of Work (SOW)?
- Will the individual/organization independently be responsible for carrying out a portion of the SOW?
- Will the individual/organization likely be a co-author on publications?
- Will the individual/organization own the intellectual property it develops?
- *The more “yes” answers to these questions, the more likely the relationship is that of a subawardee. Likewise, the more “no” answers, the more likely the relationship is that of a consultant or vendor.*

Issuing Subawards

Standard Template Works for Most Grants

- Approved by Office of Science and Technology Policy (OSTP) and Office of Management and Budget (OMB)
- Use of Government-wide core set of administrative requirements
- Meets all requirements of Uniform Guidance requirements
- Simplifies negotiations
- Improves consistency of terms and conditions
- http://sites.nationalacademies.org/PGA/fdp/PGA_063626

Other Considerations

- Flow down special terms and conditions
- Subs under contracts include flow down of FARs
- Clear Statement of Work
- Special deliverables/reports required?
- What do you know about your subrecipient?
- Should you get info about how they do things?

Issuing a Subaward - Uniform Guidance

- Subrecipient Statement of Work
- Subrecipient Budget and Budget Justification
- Subrecipient's Commitment Form
- Subrecipient's Sole Source Justification (only if the prime is a federal contract)
- Excluded Parties List System (annual basis) sam.gov
 - Entity Level
 - Individual Level
- Risk Analysis
 - Entity Level
 - Project Level
- Financial and Audit Review
 - Single Audit or Entity Financials



Subrecipient Monitoring - Uniform Guidance

Principal Investigator's Responsibility (Assisted by their Department Administrators)

- To understand the terms and conditions of the Prime award as they are flowed down to the Subrecipient.
- To review the invoices and approve the expenses reflect the work that has been accomplished.
- Scientific progress on the scope of work is as expected.
- Verify that all compliance requirements are met (IRB, APLAC etc).
- Primary point of contact for the Subrecipient during the performance of the award.
- To plan for efficient and accurate completion of the work and close out of the subaward.

<https://doresearch.stanford.edu/research-scholarship/export-controls>



Uniform Guidance – Subrecipient Monitoring Resources

<https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200-subpartD-subjectgroup-id472>

<https://www.mossadams.com/articles/2015/november/uniform-guidance-subrecipient-monitoring>



Subaward Process Requirements

Formal Proposal Stage

- Letter of intent from proposed subrecipient signed by authorized organizational representative (AOR)
 - Statement of work
 - Period of performance
 - Budget and justification of costs
 - Certifications/assurances
- May or may not be incorporated into final proposal

