

April 17 2019
UA Research Admin Forum



Agenda

- Proposal budgeting and post award expenditures hot topics
- Q&A
- May proposed agenda
- 10am – Christine Kollen UA Library Research Data Services



NSF 2 months limitation

- NSF Stance:
 - NSF awards are financial assistance agreements. NSF does not expect to full fund faculty member effort for NSF projects, but to assist.



NSF 2 months limitation

- Exceeding 2 months limitation:
 - In reasonable circumstances, the need for more time can be budgeted on the preaward side with the proposal.
 - On the postaward side, rebudgeting may occur for a reasonable purpose to exceed 2 months. For example, a GA couldn't be hired, and the PI had to fill in the time.
 - Audience examples of reasons to exceed?



Proposals with subaward TBD's

- Recently SPCS has worked with departments that have TBD subaward instances because of the nature of the program
- Examples



Proposals with subaward TBD's

- TBD can be used, with the understanding there is a risk to the institution and/or subawardee if the subawardee has a high F&A rate that causes the subaward budget to be insufficient.
 - TBD subawards should not impact submission.



Proposals with subaward TBD's

- On the postaward side, the institution will need to submit a subaward prior approval request in research.gov (or other sponsor portal) when we are ready to initiate each subaward.
- Contact PO of the program for more guidance.



Sabbatical leave and key personnel/PI

- There should be documentation on hand showing what the individual is doing during their sabbatical.
- If they are doing research during sabbatical that is ok, but should have that recorded so that if there is an audit of that time period, we have documentation showing PI was expected to be working, and is not removed from the project (which requires prior approval).



Sabbatical leave and key personnel/PI

- UA sabbatical policy and procedure should be followed
- Audience question – can you share the departmental management of sabbatical leave and how this is managed?



Participant support

Federal Uniform Guidance:

- *Participant support costs* means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.



Participant support

- NSF: Speakers and trainers generally are not considered participants and should not be included in this section of the budget.
- However, if the primary purpose of the individual's attendance at the conference is learning and receiving training as a participant, then the costs may be included under participant support.



Participant support

- How do we determine primary purpose?
 - Would they have attended the conference if they weren't invited to present?
 - Were they attending most of the sessions as a participant, or a trainer?



Participant support - Food

- NSF: How should we feed the participants?
 - This version of PAPPG that just came out addresses this more for the first time, in order to deal with this problem. If you are giving the participants money to walk to the food court to get food, put them on the participant support line.



Participant support – Food cont.

- But what about a large conference feeding a lot of people where we work with a hotel for a contract?
- That cannot be on participant support line, it must be in a different category and incur F&A. Similarly, cant use participant support for general supplies, room rental costs, etc. That is why the new guidance.



Participant support

- Participant support supplies:
 - If the supplies are for something being given directly to the participant for the activity, such as a packet or binder, program, training supply to take away from the program, that can be budgeted as participant support.



Participant support

- Participant support is being counted against the student's financial aid cap. What do we do?
 - Unfortunately this is not a NSF or agency issue, this is a general issue of how federal financial aid is calculated and what gets counted in that.



Participant support

- Student employees also being participants, is this possible?
 - Yes, as per guide. Ok if the individual's work is completely different from the participation in the program.
- Example: Student who works in the student union who participates in a research participant program. Ok to do.



Participant support

- Can we rebudget participant support?
 - No you cant move it out, but you can use parent funds to supplement participant support



Participant support

- When the PI gets Program Officer email ok for participant support issues, is that enough?
 - No, budget needs to go through research.gov for NSF, or other portals for other sponsors



Food costs on grants

- When we pay for food, how should we document?
 - You should document with a pre-published agenda, attendance list. The OIG office will request this when they audit it.
 - UA RGW guidance on meals matches this guidance. Should be essential, out of the ordinary.
 - Example: Dinner meetings, coffee breaks, take out food.



Admin costs

- Costs normally considered administrative in nature may only be budgeted and charged in unlike circumstances
- Federal government expects the negotiated indirect cost rate return to be used to cover these costs



Admin salary

- The salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs.
- Direct charging of these costs may be appropriate only if all of the following conditions are met:



Admin salary

- (1) Administrative or clerical services are integral to a project or activity;
- (2) Individuals involved can be specifically identified with the project or activity;
- (3) Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- (4) The costs are not also recovered as indirect costs.



Admin costs

- Items such as office supplies, postage, local telephone costs, periodicals and memberships should normally be treated as indirect costs.



Other hot topic costs?



May tentative agenda

- F&A rate agreement, waivers, budgets
- F&A allocation process
- Summer supp comp on grants discussion



Q&A

