



NCURA Annual Meeting

August 6-9, 2023



Research Administrator

- Understand Your Role (subject matter expert)
- Deliver Excellence
- Think Strategically (Plan Ahead)
- Build Productive Relationships/Partnerships
 - (Trust & Respect)
- Communicate Effectively
- Know the Business (continuous development)
- Know your Institution



2023 National Council of University Research Administrators | #ncuraannual

What are our responsibilities as research administrators?



Research Administrator

- Responsibilities:
 - Assist PI by providing compliance guidance
 - Direct sound business practices
 - Maintain financial documentation including cost sharing
 - Inform PI of spending rates and project end dates
 - Audit expenses and prepare transfers if required
 - Assist in Keeping Institution in compliance & out of press
 - Assist in Keeping PI, and yourself, out of Jail During/After an Audit





Code of Federal
Regulations (CFR)
§200.331

Subrecipients

- A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient.
- Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:
 1. Has its performance measured in relation to whether objectives of a Federal program were met
 2. Has responsibility for programmatic decision-making
 3. Is responsible for adherence to applicable Federal program requirements specified in the Federal award
 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.



Subaward Life Cycle

The **Prime Institution** is responsible for closely managing, evaluating, and monitoring subrecipients throughout the life of the subaward, beginning with pre-award through post-award award management and closeout.

1. Pre-Award: Subaward Determination and Risk Assessment

Conduct a risk assessment of subrecipients and document completed assessment results.

2. Post Award Monitoring: Technical and Financial Review

Review technical progress against expenditures. Ensure invoice review is conducted and any additional monitoring activities required per subaward.

3. Monitor the Monitoring: Internal Review

Confirm timely submission of FFATA reports and sample subawards to ensure monitoring is performed as required. Confirm all subrecipient audit results are reviewed timely, documented, and action is taken as necessary.

4. Annual Audit

Document! Document! Follow steps #1-3 to ensure preparation for Single Audit and any other sponsor audits.





Preaward Stage: Risk Assessment

Per Uniform Guidance, prime institutions are responsible for subrecipients adhere to all award requirements. 2 CFR 200.331 specifically requires prime institutions to assess whether subrecipients can perform the activities described in the proposal in a compliant manner.

To meet this requirement, prime institutions should:

1. Identify a set of weighted criteria (Risk Rating) that measure the subrecipient's ability to adhere to the terms of the award (see right)
2. Translate the weighted criteria into a Risk Assessment Tool that can be applied to all subrecipients in a standard and consistent manner
3. Update institutional procedures to include how the tool is utilized, how the risk assessment results are documented, and how the score is translated into monitoring actions.



Code of Federal Regulations (CFR)

§200.331

Contractors (Vendors)

A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor.

Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

1. Provides the goods and services within normal business operations
2. Provides similar goods or services to many different purchasers
3. Normally operates in a competitive environment
4. Provides goods or services that are ancillary to the operation of the Federal program
5. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.



What is a Consultant in a grant application?

Generally, a consultant is an expert from outside the institution who is hired to perform a specific service on the project for a short period of time.

1. A consultant's participation in the project will likely be intermittent.
2. A consultant is paid an hourly or daily rate, as specified in the rate proposal/letter of commitment. An estimate of the hours devoted to the project is also typically included in the letter.
3. An individual consultant is *not* an employee of the proposing institution. He/she should not be participating in the project as part of his/her normal academic duties or make use of his/her home institution's facilities or personnel.



National
Science
Foundation

Growing Research Access for Nationally Transformative Equity and Diversity (GRANTED)

Supports the development of the research enterprise, particularly at emerging research and minority-serving institutions, to address the complexity of pursuing and managing externally supported activities.

Synopsis

GRANTED supports ambitious ideas and innovative strategies to address challenges and inequalities within the research enterprise. The research enterprise is broadly defined and includes administrative support and service infrastructure such as, but not limited to, human capital, research development and administration, research analytics, technology transfer and commercialization, corporate relations/public-private partnerships, research integrity, compliance and security, research policy, administration of student research training, and research leadership. Strengthening this administrative infrastructure supporting research and STEM training is necessary to fully utilize the Nation's talent and capabilities and empower America's organizations that engage in or support research, to participate in a diverse, equitable, and internationally competitive research enterprise.

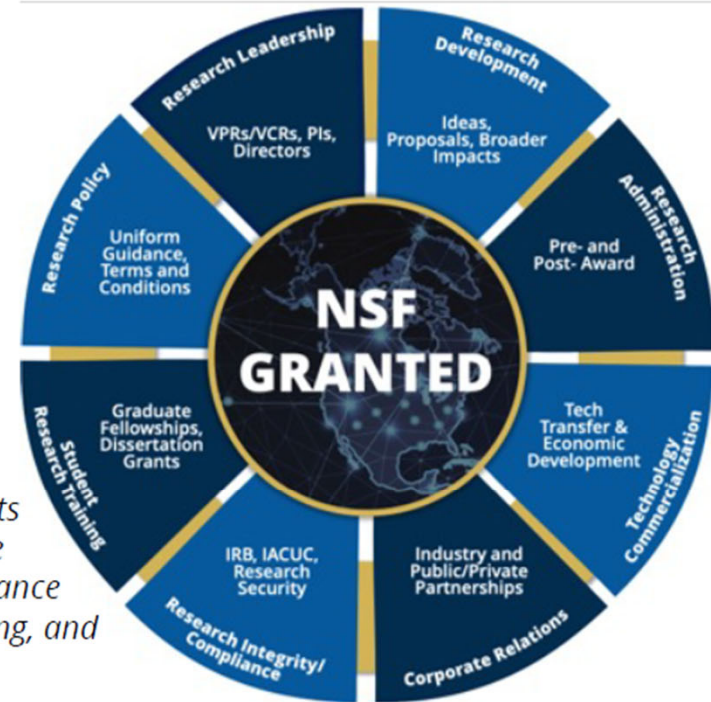
Defining the Research Enterprise



“A strong national research enterprise relies on more than funding for the research itself.”
NSF 23-221Y



Research enterprise includes human capital, practices and processes related to:
research development, research administration, broader impacts activities, technology transfer and commercialization, corporate relations/public-private partnerships, research integrity, compliance and security, research policy, support of student research training, and research leadership.



Growing Research Access for Nationally Transformative Equity and Diversity (GRANTED)

Not NSF “business as usual”



Program Description – PD 23-221Y

What is it?

- <https://new.nsf.gov/funding/opportunities/growing-research-access-nationally-transformative-0> [make sure you have the “0” included]
- Bold, ambitious ideas that will increase access, catalyze national transformation, and address systemic equity and diversity issues in the research enterprise are encouraged
- Projects must be fully developed and described within the project description
- PIs and Co-PIs could be research enterprise staff
- Project costs – ask for what you need!

Not NSF "business as usual"



Program Description – PD 23-221Y

What It's Not!

- Not a limited submission
- No deadline
- No budget floor, no budget cap
- Project terms should be no more than 5 years
- Does not restrict or discourage **any** higher education institution or non-profit organization from participating; NSF general eligibility applies
- Does not fund disciplinary research, graduate student training*, faculty training, or the offering of grant writing workshops*

* there are some caveats



Help Your PI Prepare

- Review the RFP together and think through process and requirements
- Help PI find/review awarded projects
- Offer to help PI talk to a program officer
 - Draft project summary and email to the program officer; sit in on phone call
- Learn sponsors' review criteria and peer-review processes
- Create proposal outline and checklists



Take the Initiative

- Offer to proofread
 - Builds trust, credibility, opens doors to more advanced editing
- Offer to “take a shot” at drafting or editing non-scientific components
 - Broader impacts, institutional overviews, abstracts, project summary
- Offer to help format the document
 - Decrease page length by trimming and tightening wordy sentences
 - Adjust paragraph spacing “legally”
 - Size graphics, format tables



Feedback is Personal!

- Use “we” instead of “you”
 - “Here we say that we’ll use this approach, but the description is vague.”
- If something is unclear, explain why
 - “Unclear – not sure what this abbreviation stands for. We should spell it out here to ensure the reviewers’ understanding.”
- Provide a rationale for your decisions/recommendations
 - Point to the sponsor’s program/proposal guidelines and requirements
- Point out strengths along with weaknesses
 - “Excellent introduction! It really hooks in the reader and is very compelling.”



It's Not Your Proposal

1. Editors provide suggestions*, PIs make decisions
 - *EXCEPT when the found problem is illegal, unallowable, non-compliant
 - The PI is the subject matter expert (unless you also are an expert)
 - All decisions rest with the PI – it's not your proposal
2. Include a disclaimer with your feedback that places the responsibility for the edits on the PI and not on you.
 - Reiterates that your edits are suggestions, not requirements
 - Makes the PI review your edits carefully
 - Empowers the PI to make their own decisions with their proposal



It's Not Your Proposal

1. Don't take it personally when...
 - The PI doesn't take some or all of your suggestions
 - The PI prefers their poorly written paragraph over the one you spent an hour perfecting
2. Reasons why PIs don't take your suggestions:
 - They don't have time or ran out of time to review and accept them all
 - We altered the meaning or accuracy of the content
 - It will take too much time to fix everything, only have time for the major issues
 - They prefer their colleague's hallway advice



Now What??

- Don't freak out: Rejection is normal
- Create a Resubmission Plan
- Understand the reviewer comments
- Create responses
 - Respond – Don't *Defend*
 - Address all comments
- Resubmit!

2023 National Council of University Research Administrators | #ncuraannual

BE PROACTIVE!!!

A Strategy for Allowability

1. Read the project narrative, budget and budget justification
2. Research funding notice, award document, sponsor guidelines, other regulations and institution policy
3. Confer with colleagues
4. Reach out to the sponsor



Prior Approvals Summary

1. Identify the prior approval requirements for each award
2. Uniform Guidance Section 308 outlines typical prior approval requirements
3. Research Terms & Conditions Overlay may apply
4. Confer with colleagues/central
5. Reach out to the sponsor



2023 National Council of University Research Administrators | #ncuraannual

- Develop a standard process for determining allowability and approaching prior approvals.
- Stick with the process regardless of the award to ensure you've completed a thorough review.



Equipment



Allowable

- The instrument and its accessories
- The computer(s) and software necessary for operation
- Software necessary to generate high-quality output or to visualize data
- Shipping and handling, installation fees



Not Allowed

- Space to house the instrument and renovations
- Furniture
- Ancillary workstations
- Technical personnel
- Insurance and service contracts (These costs are allocated to IDC)





Participant Support

- Budgeted in separate category that is excluded from the Modified Total Direct Costs (MTDC) when calculating F&A costs
- Accounted for in separate sub-budgets
- Funds budgeted for participant cost cannot be re-budgeted into other budget categories except with the prior written approval of the sponsor
- Funds can be re-budgeted from other budget categories into PSC without prior sponsor approval as long as it is not more than 25 percent of the total costs of that award year (exception NSF)



Participant Support



Allowable

- Stipend
- Travel
- Subsistence Allowance
- Other

“Eligible participants”



Not Allowed

- Costs for PI or project staff
- Personnel providing training services at the project activity (e.g. consultant, speaker, lecturer)
- Conference/workshop support costs (e.g. catering, supplies, equipment rental, honorariums)



Travel

How much detail is needed on the budget justification?

Scientific conferences and meetings

- NIH and NSF: If costs are reasonable, then not much detail is required.
- DOD and DOE: Always provide a detailed cost basis.

Research-related travel

- Always give a detailed explanation of the purpose of travel and a detailed cost analysis.



Budget Justifications



Tell the story and include any likely alternative endings

- Your greatest ally during post award management? A detailed budget justification with built in contingency plans for the most likely project changes.
 - Remember: the first response to almost any post award “Can I charge that” question is “Did you explicitly budget and justify it?”
 - Generic or canned budget justification language is not helpful. What your PI might think is a “standard” consumable supply might not be so standard to the sponsor, so spell it out.
 - Adding “or comparable” to specific items, like equipment, can be instrumental in affording you some post award latitude.
 - Always, always, always explicitly justify any cost that could be considered niche/non-standard.
- 2023 National Council of University Research Administrators | #ncuraannual
- Costs should be justified and documented such that ultimately they are supported in an audit.

What are we talking about?!

- Time & Effort (OMB) vs. payroll certifications (2 CFR 200 – Uniform Guidance) - *§200.430 (i) Standards for Documentation of Personnel*

National Science Foundation Proposal Modernization Update: Research.gov

