



OFFICE OF THE VICE CHANCELLOR
FOR RESEARCH

Research Administrators Monthly Meeting

August 2020

Office of Sponsored Programs (OSP)



AY21 Kick-Off

Q&A with OSP

Preliminary FY20 Metrics

Proposals	FY19	FY20	Increase/ (Decrease)	% Change
Number of Proposals	2,627	2,684	57	2.2%
Proposed Amount	\$528.2M	\$585.8M	\$57.6M	10.9%

Awards	FY19	FY20	Increase/ (Decrease)	% Change
Number of Awards	2,882	2,810	(72)	-2.5%
Awarded Amount	\$380.0M	\$393.7M	\$13.7M	3.6%

Expenditures	FY19	FY20	Increase/ (Decrease)	% Change
YTD Expense	\$314.9M	\$328.0M	\$13.1M	4.2%

Note – The FY20 figures exclude \$32.2M in proposals and awards, and \$28.2M in expenses related to the CARES Act Higher Education Emergency Relief Funds (HEERF)

COVID-19 Funding

As of August 12, 2020:

- ❑ Accepted 49 awards related to COVID-19 studies or recovery opportunities
- ❑ Executed 33 data use, collaborative and non-disclosure agreements
- ❑ Submitted 128 COVID-19 related proposals

Remote Work Outside of U.S.

University guidance released in July 2020 allows departments to make employment offers for those working outside of the U.S. during the pandemic, **unless:**

- 1) They are from countries that are under export control restrictions (Cuba, Iran, North Korea, Sudan, Syria, the Crimea region of Ukraine, or Venezuela), -OR-
- 2) They are unable to perform their appointment duties due to export controls or otherwise.

Remote Work Outside of U.S.

NIH Guidance: <https://grants.nih.gov/faqs#/covid-19.htm?anchor=alphaHeader4203>

1. If a post-doc on an active NIH grant must return home, to a foreign country, and work remotely due to COVID-19, must this be reported to NIH as a foreign component?

For post-docs that are required to work on their **originally approved work remotely from a foreign country** due to COVID-19 travel restrictions, **where no grant funds are going to a foreign entity**, NIH has determined that this scenario does **not** constitute the performance of a significant scientific element or segment of the project outside the US, as outlined in the [NIH Grants Policy Statement](#) definition of a foreign component.

21. Can an international student who is unable to physically arrive in the U.S. to start their program this fall because of COVID-related travel restrictions, but who is participating in on-line distance education, be supported from federal grants? Can tuition be charged to the grant on which the faculty member intends for them to work when they arrive in the U.S.?

NIH understands that travel restrictions may continue to occur through the remainder of the public health emergency and may affect international students and post-docs. For **trainees and fellows who have not yet been appointed and cannot travel to the U.S. to start work on their NIH-funded projects, stipends and other expenses may not be charged.**

22. Can international students and post-docs continue to be supported on NIH grant projects if they are not able to return to the U.S. because of COVID-19 related travel restrictions?

NIH understands that travel restrictions may continue to occur through the remainder of the public health emergency and may affect international students and post-docs. Charging salaries to NIH grants when no work is being performed is allowable through **September 30, 2020**, if your organization's policy allows for the charging of salaries and benefits to currently active awards (under unexpected or extraordinary circumstances) from all funding sources, Federal and non-Federal. However, due to the varying requirements of student and work visas, recipient institutions should consult with their Human Resources Department to ensure that such charges, if anticipated, comply with all requirements.

Remote Work Outside of U.S.

NSF FAQs 7-30-20: https://www.nsf.gov/bfa/dias/policy/covid19/covid19faqs_m2026proposerandawardee.pdf

5. *New Question:* *If a PI is working outside the U.S. for an extended period of time, but they plan to continue to oversee the NSF-funded project remotely, does this need to be reported to NSF?*

NSF Response: *In accordance with the terms and conditions of an NSF award, if a named PI plans to or becomes aware that he or she will: (1) devote substantially less effort to the work than anticipated in the approved proposal (defined in 2 CFR § 200.308(c)(iii) as a reduction of 25% or more in time devoted to the project); (2) sever his or her connection with the grantee; or (3) be disengaged from the project for a continuous period of more than 3 months, or otherwise relinquish active direction of the project, he or she shall advise the appropriate official at the grantee organization, who shall initiate action appropriate to the situation in accordance with the guidelines described in PAPPG Chapter VII.B.2. NSF will then take appropriate action based on the specifics of the request. If these conditions do not apply, then the grantee organization is responsible for making the determination regarding the PI's capacity to continue to oversee the project. Any further questions should be addressed to the cognizant NSF Program Officer.*

Latest OMB Guidance

M-20-26 (6/18/20): [Extension of Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations](#)

- Rescinds M-20-17 and M-20-20, expires September 30 2020.
- Allows the continued charging of salary consistent with institutional policy across all funding sources **but indicates recipients should retain documentation of their efforts to exhaust other funding sources and reduce overall operational costs.**
- Allows delay of completion and submission of the Single Audit in certain circumstances.

What you must do to meet this restriction

“...retain documentation of efforts to exhaust other funding sources...” noted in M-20-26?

- For all awards you reported “Idle Staff Carrying Cost” after 6/17/20 (2020 BW 14 or MN 7), you must review:
 - All non-sponsored funding sources available to each PI (for example, start-up fund, unrestricted funds, ICR, etc.)
 - Document why you are not able to utilize any of the non-sponsored funding sources
 - If applicable, document what actions you are taking to complete the scope of work impacted by COVID-19 (for example, rebudgeting, requests for supplemental funding or no-cost extension, reducing costs, etc.)

FY21 Fringe Benefit Rates

Academic and Non-Academic Fringe Benefit Rates

Benefit Type	FY20 Rate	FY21 Rate
Retirement/Disability (SURS)	13.02%	12.70%*
Health, Life, & Dental (HLD) Insurance	18.89%	27.83%**
Termination Vacation/Sick (TVS) Leave	0.85%	0.86%**
FICA (Medicare)	1.45%	1.45%*
Workers' Compensation	0.01%	0.01%**
Total for most academic and non-academic appointments of 50% or more	34.22%	42.85%**

Graduate Assistant Fringe Benefit Rates

Benefit Type	FY20 Rate	FY21 Rate
Health, Dental and Vision (HDV)	3.68%	4.30%**
Workers' Compensation	0.01%	0.03%**
Total for graduate assistant appointments between 25% to 67%	3.69%	4.33%**

* Actual rate for FY21 (Final)

** Rate is subject to adjustment after federal audit (Provisional)

Note – The Workers' Compensation and total academic/non-academic rates were updated to .01% and 42.85%, respectively, following the August 21, 2020 announcement of the slight change in FY21 rates.

Impact on Existing Award Budget

- Most sponsors do not award additional funds to cover fringe benefit rate increases
- Rebudgeting for increases/decreases in fringe benefit is generally allowable without sponsor's prior approval for up to 10 - 25% of total approved budget
- Review your award terms and conditions

General Rebudgeting Guidelines

[Uniform Guidance §200.308 Revision of budget and program plans.](#)

§200.308 Revision of budget and program plans.

(e) The Federal awarding agency may, at its option, restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the Simplified Acquisition Threshold and the cumulative amount of such transfers exceeds or is expected to exceed **10 percent** of the total budget as last approved by the Federal awarding agency. The Federal awarding agency cannot permit a transfer that would cause any Federal appropriation to be used for purposes other than those consistent with the appropriation.

NIH GPS - 8.1.2 Prior Approval Requirements:

8.1.1.2 Cost-Related Prior Approvals

NIH prior approval is not required to rebudget funds for any direct cost item that the applicable cost principles identify as requiring the Federal awarding agency's prior approval, unless the incurrence of costs is associated with or is considered to be a change in scope.

8.1.2.5 Change in Scope

Significant rebudgeting, whether or not the particular expenditure(s) require prior approval. Significant rebudgeting occurs when expenditures in a single direct cost budget category deviate (increase or decrease) from the categorical commitment level established for the budget period by **25 percent or more** of the total costs awarded. For example, if the award budget for total costs is \$200,000, any rebudgeting that would result in an increase or decrease of more than \$50,000 in a budget category is considered significant rebudgeting. The base used for determining significant rebudgeting excludes the effects of prior-year carryover balances but includes competing and non-competing supplements. Significant rebudgeting does not apply to modular grants.

NSF PAPPG Chapter X.A.3

3. Prior Written Approvals

The funding of items identified in the NSF grant budget constitutes NSF's authorization for the grantee to incur these costs, provided there is not a specific limitation in the grant language and the costs are otherwise allowable, allocable, and reasonable in accordance with the cost principles contained in 2 CFR § 200, Subpart E.

If required in furtherance of the project, the grantee is authorized to transfer funds from one budget category to another for allowable expenditures. Grantees should refer to the applicable grant general terms and conditions referenced in the grant. The [Research Terms and Conditions \(RTC\), Appendix A](#), (NSF column) provides a consolidated listing of prior approvals that are required to be obtained from NSF. Unless otherwise specified in the grant notice or the applicable grant general terms and conditions, no additional prior approvals beyond those specified in RTC Appendix A are required. [Chapter VII.A.2](#) also provides a listing of required notifications to NSF.

Research Terms & Conditions, Appendix A

Research Terms and Conditions Appendix A Prior Approval Matrix December 10, 2018

	Reference	RTC Overlay	NSF	DOE	NIH	USDA NIFA	DOC	NASA
Prior Written Approval (prior approval)*	200.407							
Revision of budget and program plans	200.407(d)							
Change in the scope or the objective of the project or program.	200.308(c)(1)(i)	Required	Required	Required	Required	Required	Required	Required
Change in PI/PD specified in the application or Federal award.	200.308(c)(1)(ii)	Required	Required ¹⁴	Required	Required	Required	Required	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved PI/PD.	200.308(c)(1)(iii)	Required	Required ¹⁴	Required	Required ⁶	Required	Required	Required ²¹
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E – Cost Principles.	200.308(c)(1)(iv)	Required	Waived ¹	Required	Waived ⁷	Required	Required	Required
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(1)(v)	Required	Required ²	Required	Waived ⁸	Required	Required	Waived ²²
Subawarding, transferring or contracting out any work under a Federal award. This provision does not apply to the acquisition of supplies, material, equipment or general purpose services.	200.308(c)(1)(vi)	Required	Required	Required	Waived ⁹	Waived ¹⁶	Required	Waived
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(1)(vii)	Required	Required	Required	Required	Waived ¹⁷	Required	Waived
Need for additional Federal funding to complete the project.	200.308(c)(1)(viii)	Required	Required	Required	Required	Required	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the award.	200.308(d)(1)	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(d)(1)	Required	Required	Required	Required	Required	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(d)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Subsequent no-cost extension or extension of more than 12 months.	200.308(d)(2)	Required	Required	Required	Required	Required	Required	Required
Carry-forward of unexpended balances to subsequent funding periods.	200.308(d)(3)	Waived	Waived	Waived	Waived ¹⁰	Waived	Waived	Waived
Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.	200.308(d)(4)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived
Rebudgeting among direct cost categories for Federal awards in which the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the approved budget.	200.308(e)	Waived	Waived	Waived	Waived ¹¹	Waived	Waived	Waived ^{22, 23}
Transfer of funds between construction and non-construction activities	200.308(n)(1)	Required	Required	Required	Required	Required	Required	Required



Any Questions?