Land Acknowledgement Statement

"Arizona State University, Northern Arizona University, and the University of Arizona collectively acknowledge that the campuses are situated on the ancestral lands of twenty-two federally recognized tribes located across Arizona. These universities collectively honor the past, present, and future generations of Native Americans, who have lived here for millennia and will forever call this place home. Committed to diversity, the institutions integrate Indigenous knowledge into their practices and strive to cultivate sustainable relationships with Native Nations through education, partnerships, and community service."

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Best Practices

Best Practices for Communicating

Communicating with PI's

- Our job as RA's is to say "how", not "no". We want to be helpful, but remain compliant. Use advanced problem solving skills.

- Dialog should be closed-looped, yet friendly and direct. Find the balance of being personable and respectful, but important to use closed loop communication while avoiding ambiguous verbiage.

- Don't make rash decisions. Stay calm and make a rational decision.

- Ask questions you don't know the answer to - this builds connection.

- Understand and explain institution and sponsor policies as appropriate.

Best Practices for Communicating

Communicating with PI's regarding budgets

- Adhere to proposal budget deadlines. Don't procrastinate.

- Work through the conflict. Conflict doesn't mean you're doing something wrong.

- Conflict fosters interpersonal relationships.

- Work through the difficult conversations regarding policy changes.

- Be accurate as to what the needs of the project are, then adjust.

- If you don't know, we'll work on it and ask questions.

Pre-Award Best Practices

- Review the Funding Announcement closely for eligibility, requirements, submission process, dates, etc.

- Facilities & Administrative Rates (Indirects; Overhead)
- What type of project?
  - Research? Instruction? Conference? Public or Community Service?
- Is Cost-Share/Matching required? Encouraged? Prohibited?
- Itemize travel in the justification as much as possible.
- Itemize materials and supplies as appropriate. Must be "essential and allocable."
- Show Graduate Research/Teaching Assistant as 9 AY and 3 Summer months, so the sponsor has a clear understanding of the actual effort of the GRA. Include institutional description detailing 20 hours is full-time equivalent.
- Budget is reasonable and accurate to complete project deliverables.

Post-Award Best Practices

Changes in Key/Senior Personnel

- How will the "Scope of Work" be impacted as a result of any changes? Co-PI?

- Identify the project change(s) necessary to complete and/or obtain the deliverable(s).

- How will the requested change benefit or improve the research?

- Does the new Co-PI have the specific unique skills to contribute to the project?

- Is the timeframe still reasonable and accurate?

Post-Award Best Practices

Non Allowable "late in period" Expenses

Here are some examples of questions re: spending that likely are not appropriate:

- Is PI restocking lab shelves at the end of the project just because there is money left?
- Is PI buying a piece of equipment that they didn't budget or plan for?
- Is PI moving a student onto the project that has been on another project for the rest of the year? Has that student worked on this project for any period of time, and why the move now?
- Is PI increasing effort charged just to spend down money?

Complex Questions for Changes in the Budget or "late in period" Expenses

- Is this absolutely necessary to the work on the project?
- Will this halt work on the project if not expensed?
- Does this advance the project?
- Is this required for the project?

Post-Award Common Issues
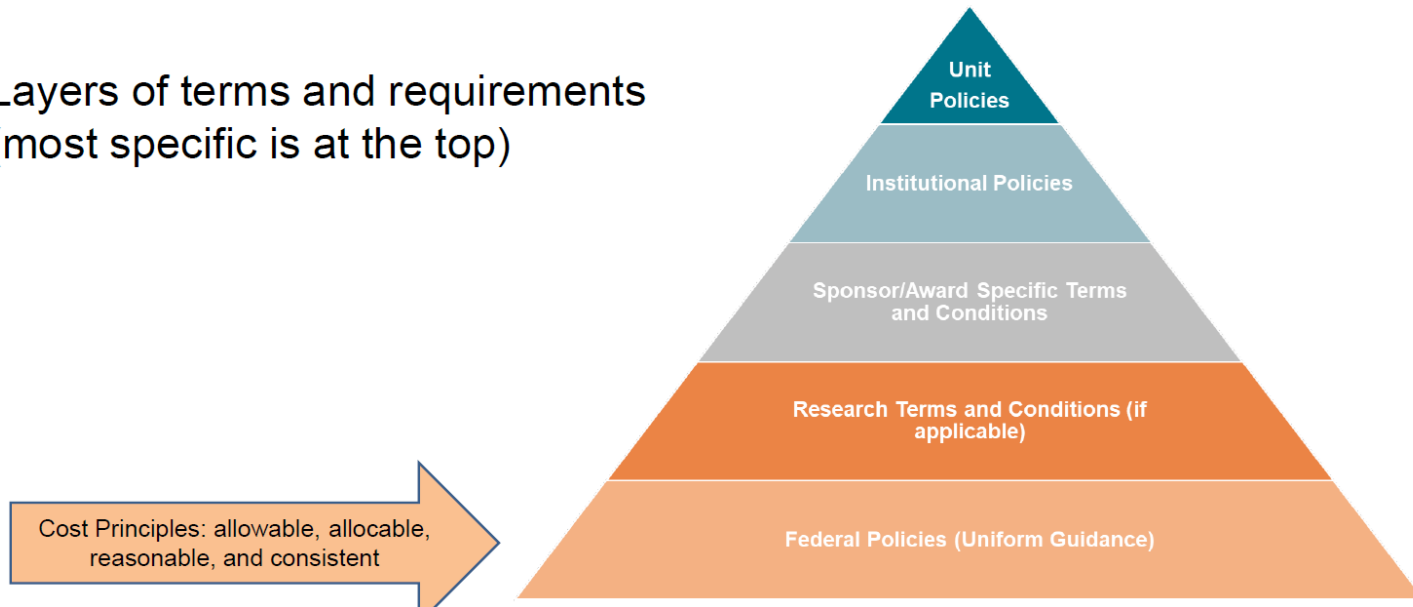
Common Budgetary Issues with NSF

- *Is food allowable?*
    - Does it fall under § 200.438 Entertainment costs? If so, no.
    - Does it fall under the definition of § 200.432 Conferences? If so, *yes*, if deemed absolutely necessary to the project outcomes.

- *Can I reduce PI or Co-PI effort without sponsor approval?* No, if reducing more than 25% of the proposed PI/Co-PI effort budgeted, sponsor approval is required. Review the prior approval matrix and PAPPG.

- *Can I rebudget funds out of participant support without approval?* No. Review the prior approval matrix. Prior approval is required along with justification.

- *If the PI moves:* Grant may be transferred entirely, or a sub-award may be issued to the new institution. Both require sponsor approval.

Requirements

Regulatory Framework

Layers of terms and requirements (most specific is at the top)

Cost Principles: allowable, allocable, reasonable, and consistent

Unit Policies

Institutional Policies

Sponsor/Award Specific Terms and Conditions

Research Terms and Conditions (if applicable)

Federal Policies (Uniform Guidance)

Regulatory Framework

- Cost Principles: allowable, allocable, reasonable, and consistent.

- Follow the most restrictive rules and regulations and apply layers of regulations. 2 CFR § 200.61 - Internal controls.

- Identify suitable ways to document expenses that are audit ready.

- Adhere to sponsor's Terms and Conditions, sponsor guidelines, Uniform Guidance, institutional policy.

Participant Support

ASU's Definition

Participant support costs are payments to individuals for training through a workshop, conference, seminar, or other short term instructional or information sharing activity funded by a sponsored award.

2 CFR § 200.1

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.

When may participant support costs be appropriate?

- Attendee at a workshop, conference or symposia funded by a sponsored project
- Short-term educational project/training activity including programs such as, but not limited to:
  - NSF Research Experiences for Undergraduates
  - NSF Research Experiences for Teachers
  - NSF Research Traineeship
  - NIH National Center for Rehabilitative Auditory Research Summer Research Training Program

Human Subjects

ASU's Definition

Incentive payment to encourage individuals to participate in a research study and provide private data/information through intervention or interaction. This includes participation in surveys and interviews.

Research is defined as "a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge."

A **human subject** is defined as "a living individual about whom an investigator conducting research obtains data through intervention or interaction with the individual or identifiable private information." This definition can include online surveys, collection of data from Twitter, analysis of coursework, observing behavior, interviews, etc.

Sponsor-Specific

National Science Foundation

Common Budgetary Issues with NSF

- Two-Month salary limit for PI and other Senior Personnel (per CY)
  - additional time must be strongly justified

- For Senior Personnel justification:
  - To meet the NSF PAPPG requirement "Defining of a Year", ASU has defined a "year" as a calendar year for senior personnel and will apply this term "year" consistently across all NSF-funded grants.

- Consultants justification:
  - include the individual's expertise, primary organization affiliation, normal daily compensation rate, and number of days of expected service to the project.

Other Federal Sponsors

Common Budgetary Issues

- Is there a restricted rate or training rate to consider?

- Non-Regulatory Guidance (understand objectives of competition)
  - Identify Needs
  - Evidence-Based and Relevant Project Components
  - Implementation Plan
  - Implement
  - Examine and Reflect

Other Federal Sponsors

Common Budgetary Issues (continued)

- Build America, Buy America Act: *all infrastructure projects supported by federal financial assistance and federal contracts use iron, steel, manufactured products, and construction materials made in the United States.*

- Fly America Act: *All air travel and cargo transportation services funded by the federal government are required to use a "U.S. flag" air carrier service (exceptions may apply)*

- Open Skies Agreements: *agreements between the U.S. Government and the governments of foreign countries that allow travelers to use foreign air carriers from these countries for government-funded international travel.*

Other Federal Sponsors

Common Budgetary Issues (continued)

- Denial of Continuation Grant
  - Funds may be released annually, sponsor may cease funding at their discretion
  - Grantee may request reconsideration:
    - Submitted in writing to the Department official identified in the notice denying the continuation award by a date specified in that notice.
    - Set forth the grantee's basis for objecting to the decision not to make a continuation award and include any relevant supporting documentation.

- Can grantees and subgrantees use DOEd awarded funds - including annually appropriated funds and COVID-19 pandemic relief funds - as matching funds for AmeriCorps programs?
  - YES! https://www2.ed.gov/policy/fund/guid/americorps-matching-letter.pdf?src=grants-page

National Institutes of Health

- NIH Data Management and Sharing Policy
  - The 2023 policy requires ALL grant and applications or renewals that generate Scientific Data must include a robust and detailed plan for how you will manage and share data during the entire funded period. This includes information on data storage, access policies/procedures, preservation, metadata standards, distrunition approaches, and more.
  - Costs are almost never zero.
  - Costs must be requested in the appropriate cost category(ies), e.g., personnel, equipment, supplies, and other expenses.
  - Data management costs are allowable such as repository fees, de-identification, staff time, etc. See NIH Guidance for additional allowable and unallowable costs.
  - Must include costs in budget if data will be collection (one ASU unit's example is that always budget at least an average of $1,000 per proposal year).
  - Clearly state these proposed in the Budget Justification. This section must be titled Data Management and Sharing Justification, the recommended length of this section is no more than half a page, and it must specify if no costs will be incurred.

DOD & DARPA

- Task Budgeting
  - Help guide investigator on grouping tasks or subtasks in order to facilitate task budgeting.
  - Include project manager effort. DOD generally requires monthly reporting.
  - Encourage PI to include an "admin" task to cover project manager, travel, or any other overall project management costs.
  - NIST/CMMC Costs: frequently not needed due to fundamental research designation, but confirm with PI. If confirmed fundamental research, include disclaimer in budget justification stating NIST/CMMC requirement should not apply. If not fundamental research, cost may need to be included.
  - Quotes for equipment are required for an award, save time by including them in the proposal.

USAID & International

- Staffing
  - Project Managers and Project Coordinators
  - Out of country vs. local staff - where to budget
  - ERE rates

- Participant Support
  - Workshops, what is participant and what is not (eg. speakers/translators are not participant support).
  - Room rental fees and AV fees are not participant support
  - Stipends - tax implications for foreign participants
  - Catering, if you are going to include as participant support, you must be able to determine who is a participant (speakers, staff, etc. are not participants). If that can't be easily determined, include catering as ODC.

USAID & International

- Other Direct Costs
    - Subrecipient vs. vendor
    - Professional Employment Organization (PEO)
    - Rent - excluded from F&A
    - Utilities, office supplies, communications, etc.
    - Geographic codes when purchasing
    - Vet all entities prior to doing business
    - VAT
    - Overhead rate - which do you use

Foundations and Non-Profits

Common Issues

- Confirm eligibility

- Understand submission process
  - Email / Sponsor portal / third party site / in person or mail

- Policies regarding indirect costs (published), fees, budget allowances

- Due dates
  - May have one, multiple, rolling, or none

Corporate and Industry

Common Budgetary Issues

- May be cooperative agreements more often than grants

- May also be fixed price

- Budgets usually have no limitations other than negotiated parameters

- Indirect Costs are higher (products/data may be used for future revenue)

- Some of these businesses have foundational partners; confirm sponsor

Cost Share

Cost Share / Matching

Common issues with cost share after an award has been made

- Changes between cash, AY effort and 3rd party. Ensure all parties involved (PI, RA's, subs, etc) are understanding the types of cost share being committed.

Cost share changes that require sponsor approval

- N/A - The institution is responsible for meeting the cost share amount, regardless of how it's obtained.

Resources

- **Slide # 4** | Author (**Date**). Title, Publisher, URL - https://researchadmin.asu.edu/procedures/execute-project/manage-change/

- **Slide #6 https://nsf-gov-resources.nsf.gov/files/nsf24_1.pdf?VersionId=1kJf1IdESF8i4HjouuJ7Q6A0oJD3CIK3 https://www.ecfr.gov/ https://www.nsf.gov/bfa/dias/policy/fedrtc/appendix_a.pdf**

- **Slide # 7 Regulatory Framework: Which Set of Requirements Do We Need to Follow?**

- **Slide #5 A guide to the project management body of knowledge (PMBOK® guide). -- Fifth edition.**

- **Slide #12** https://researchadmin.asu.edu/resources/participant-support-costs/ https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-A/subject-group-ECFR2a6a0087862fd2c/section-200.1

- **Slide #13** https://researchintegrity.asu.edu/human-subjects

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