

Hot Topics in Pre-Award: Building Bridges through People and Processes

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."



Hot Topics in Pre-Award: Building Bridges through People and Processes Sarah Gates Pre-Award Manager ORSPA Proposals & Negotiations, ASU

Sherry Boyd-Grossman
Research Advancement Manager
College of Liberal Arts and
Sciences, ASU

Presenters:

Sarah Gates

- BA in Journalism, Master of Nonprofit Studies
- RA in Sociology in 2005, moved to Research Operations 2011
- Proposals and Negotiations Team conduct institutional review and manage transmission of proposals. Support Research Administration community, act as liaison to sponsor and provide proposal authorization.

Presenters:

Sherry Boyd-Grossman

- BS Accountancy, MS Psychology
- Started as SWIV in 2016, now RAM SS Division
- Support Depts. that have no RA Team, Overflow/backup support to to others, Liaison between Depts. and Dean's office, Educating SS Faculty on sponsored project funding, socializing to the "ASU way"



Agenda



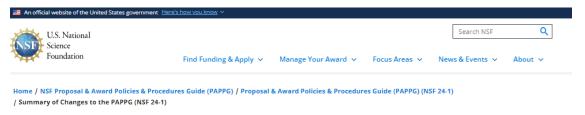
Takeaways

- Gain insights in a collaborative forum on the methods and personnel engaged to successfully stay ahead of the advancements in pre-award.
- What are your Hot Topics?
- Q&A





Summary of Changes to the PAPPG (NSF 24-1)



Summary of Changes to the PAPPG (NSF 24-1)

Proposal & Award Policies & Procedures Guide (PAPPG) (NSF 24-1)

PAPPG - printable version (PDF) Summary of Changes to the PAPPG Table of Contents Introduction + Part I: Proposal Preparation and Submission Guidelines + Part II: Award, Administration and Monitoring of NSF Assistance Awards Subject Index Privacy Act and Public Burden

Effective Date May 20, 2024

Overall Document

- Editorial changes have been made throughout to either clarify or enhance the intended meaning of a sentence or section.
- · Website and document references have been updated to reflect current information.
- Updates have been made to ensure consistency with data contained in NSF systems or guidance located and terminology used in other NSF or Federal policy documents.

By-Chapter Changes

Chapter I: Pre-Submission Information

- Chapter I.D, Concept Outlines, has been updated to provide additional clarity on the use of concept outlines and the Program Suitability and Proposal Concept Tool (ProSPCT).
- Chapter I.D, Types of Submissions, includes new coverage on the use of concept outlines and
 the required use of the Program Suitability and Proposal Concept Tool (ProSPCT) for
 submission. Additional changes on the use of concept outlines and the use of ProSPCT for
 specific proposal types is available in Chapter II.E.
- . Chapter I.E, Who May Submit Proposals:
 - 1(c) Tribal Nations, has been revised to substitute the term "Tribal Government" with the term "Tribal nation". This update has also been made throughout the PAPPG.
 - 2(c) Foreign Organizations, has been updated to clarify the information required from proposers to justify the request to provide funding through the NSF budget of a foreign organization or foreign individual (through a subaward or consultant arrangement).
 - 3(b) Parties to Malign Foreign Talent Recruitment Programs, has been modified to incorporate a new section establishing that individuals who are a party to a Malign Foreign Talent Recruitment Program are not eligible to serve as a senior/key person on an NSF proposal.
- Chapter I.F, When to Submit Proposals, has been modified to clarify that the 5 p.m. submitter's local time is tied to the organization, and not the location of the Pl.
- Chap r G.2, Requirements of all to to the Entity do the Entity of the Company o



Change Review & Impact

a A	В	C	D	E	F	G	Н	J	
Торіс	Update, Addition,	Language in 23-1	Page#	Language in 24-1(draft)	Page#	Comments	Update included in final 24-1?	Possible PFG Action	Notes
Foreign Organizations	Update	or research opportunities to the U.S.	31	organization or foreign individual offers to the U.S	31	arrangement to a foreign organization or individual.	Yes	benefit to US research and education	12
3. The following are not eligible to submit proposals to NSF:	Addition			(b) Parties to Malign Foreign Talent Recruitment Programs I Individuals who are a party to a Malign Foreign Talent Recruitment Program are not eligible to serve as senior personnel on an NSF proposal or on any NSF award made after January X, 2024. See PAPPG Chapter II. D. 1. e for additional information on required certifications associated with Malign Foreign Talent Recruitment Programs		New language has been added regarding the prohibition to participate in a Malign Foreign Talent Recruitment Program. Please note that since the specific date in January 2024 has not yet been identified, this language will be revised at the time of final posting on the NSF website to include the implementation date. Language has been clarified to specify that 5 p.m. submitter's	Yes	Establishing a process for unit, PI, or RA to reach out to ORIA when/if this topic arises in relation to senior personnel at the proposal or post-submission stage. Is this something that can be caught with a visual compliance check? Keeping an eye out for situations where there may	Are there exisiting profinvolvement does help in some instance for digging into this in advised to take on?
3. Submission Windows	Update	Failure to submit by 5, p.m. submitter's local time		Failure to submit by 5.p.m. organization's (submitter's) local time	32	local time refers to the location of the organization, rather than the	Yes	be confusion as to when a proposal is due (5pm AZ time)	
2. Requirements Relating to Unique Entity Identifier (UEI) and Registration in the System for Award Management (SAM)		All proposers must provide a UEI when applying for a new or renewal award		All proposers must provide a UEI when applying for a new or renewal award or transfer of an award		Language has been revised to clarify the requirements relating to UEI and Sam Registration	Yes	Ensuring UEI is included on cover sheet and ensure SAM.gov registration is up- to-date (Amber will work on that renewal in April)	
B. NSF Disclosure Requirements	Addition			1. Preaward Disclosures and 2. Postaward Disclosures (ix) Certification Regarding	37	Section has been updated to reflect both preaward and postaward disclosures.	Yes	Adding to the NSF STB instructions for submitting CPS post-submission requests in r.gov (especially as such requests increase in frequency). Establishing a process for	Currently seeking R resource. Ask team to jot n arise.



PI Response







Two Examples

NSF PAPPG 24-1

- Proposals that may impact Tribal Resources and Interests
- Malign Foreign Talent Recruitment Program



Tribal Partnerships

Seeking and Obtaining Tribal Nation Approval for Proposals that May Impact Tribal Resources or Interests

- Requires that relevant proposals include a copy of a written request to any impacted Tribal Nation(s).
- At <u>proposal time</u>, the <u>request is required</u>, however if the project is selected for funding, NSF will <u>require documentation of written approval from all impacted</u>
 <u>Tribal Nations before issuing an award</u>.
- Per NSF "Projects that do not have prior written approval from the official(s) designated by the relevant Tribal Nation(s) will not be awarded by NSF"



Tribal Partnerships

ASU Process for NSF Proposals that May Impact Tribal Resources or Interests:

- PI/Unit will review the <u>Tribal Partnerships</u> page, as well as the 'Research on tribal lands or with tribal populations' section on the IRB <u>Special Considerations</u> page (including <u>Guidance: Native American Tribal Consultation</u>). PI/Unit will reach out to <u>indigenous research@asu.edu</u>, to communicate a desire to work with a tribe and the reasons why. The reasons for working with a tribe should extend beyond any funding opportunity and be rooted in the tribe's interests.
- At proposal time, PI/Unit will reach out to indigenousresearch@asu.edu to communicate plans to submit an NSF proposal that may impact tribal resources or interests. Guidance and support for sending a written request to a tribe (or tribes) may be provided. In order to ensure these services can be supplied, please provide as much advanced notice as possible ahead of any sponsor deadlines.
- PI/Unit will provide a copy of the written request(s) to any Tribal Nation(s) to the unit Research Advancement Administrator (RA) for upload to Research.gov as part of the NSF proposal package.
- If the proposal is recommended for funding, the PI/Unit will be required to submit documentation of Tribal Nation approval to NSF. PI/Unit will reach out to indigenousresearch@asu.edu if assistance is needed to obtain written approval prior to award.

Task Table

A	В	С	D	E	F
Key Details:					
Internal Deadline: 2/1/2	21				
ORSPA Deadline: 2/2/2:	1				
Sponsor Deadline/TIME	: 2/5/21				
FOA link: https://www.i	nsf.gov/p	ubs/2021/nsf.	21019/nsf21019.jsp		
Details: \$300,000 TOTA	L max 2 y	ears			
Proposed start date: 10	/1/21?				
Task	Lead	Status	Notes	Rec'd	Loaded
Eligibility	PI/RA	Complete	DCL Inquiry authorized	N/A	N/A
Create ERA site	RA	Complete	FP00028047	N/A	N/A
Create Research.gov sit	RA	Complete	Temp ID#8118342	N/A	N/A
Type of proposal	PI	Complete	EAGER	N/A	N/A
Project Summary	PI	Underway	Project Summary	X-draft	
Project Description	PI	Underway	Project Description "brief and must be no more than 8 pages" " Research teams should show demonstrated expertise in the SBE sciences and at least one of the research proposals should describe how each participating discipline will contribute to intellectual merit and broad EAGER is a funding mechanism for supporting exploratory work, in its early stages, on untested but poten		
Budget	RA Complete 7 one day conferences: run them at 35 grand a piece, split between travel and accommodation for 15 no 3 in ASU Phoenix Metro New Mayo location 2 in ASU Washington DC center 2 in Los Angeles new Herald Examiner Building		Х	X	
3.a. Budget Justification	RA	Complete	<u>Budget Justification</u>	X	X
Supplementary Docs (components below)	PI/RA		Supplementary Docs	N/A	N/A
4.a. Data Management Plan	PI/RA	Complete	"A valid Data Management Plan may include only the statement that no detailed plan is needed" check Rc X		X
4.b. Concept Outline Approval	PI/RA	Complete	Request clean copy/pdf from PI	X	X
	PI	Underway	Collaborators & Other Affiliations Information Penuire Complate (CA ten Complete Control Senior Penanel)	PIs and Senior Pe	X



Time Table Estimator

Sponsor Submission Due Date 7/1/24							
Proposal Submission (components below)		Start Date	Due Date	Date Complete			
1.a. Create proposal in ERA	RA	3/3/2024	3/17/2024				
1.b. Create PI profile in Workspace	PI	3/3/2024	3/17/2024				
1.c. Create proposal in Workspace (Fastlane, NSPIRES, Grants.gov, et) PI/RA	5/2/2024	5/9/2024				
1.d. Department Review	RA	6/21/2024	7/1/2024				
1.e. ORSPA Review	RA	6/24/2024	7/1/2024				
Proposal Narrative (components below)							
2.a. Project Abstract	PI	3/3/2024	6/20/2024				
2.b. Title Page	PI	3/3/2024	6/20/2024				
2.c. Table of Contents and Figures	PI	3/3/2024	6/20/2024				
2.d. Main Body	PI	3/3/2024	6/20/2024				
Supporting Documents (components below)		'					
3.a.Bibliography/References	PI	3/3/2024	6/20/2024				
3.b. CVs/Biosketches (See SciENcv to create document)	PI	3/3/2024	6/14/2024				
3.c. Consortium/ contractual arrangements	RA	3/3/2024	6/14/2024				
3.d. Letter(s) of Support	RA	3/3/2024	6/14/2024				
3.e. Data Management Plan	PI	3/3/2024	6/14/2024				
3.f. Facilities and Equiptment	PI	3/3/2024	6/14/2024				
3.g.Current and Pending	RA	5/2/2024	5/16/2024				
3.h. List of proposed project staff, affiliation, and roles.	PI/RA	2/2/2024	4/29/2024				
3.i. Timeline and expected milestones	PI	3/3/2024	6/14/2024				
3.j. Letter(s) of support	PI/RA	4/2/2024	6/14/2024				
Budget (components below)							
4.a. Budget Development	PI/RA	4/2/2024	6/7/2024				
4.b. Budget Justification	PI/RA	5/2/2024	6/14/2024				
4.c. Proposed Subawards	PI/RA	3/3/2024	6/14/2024				
4.c.2 Subaward Documents Collected	PI/RA	5/2/2024	6/14/2024				
Services to Use (components below,) **Note these are optional an	d are contigent on	being on task**					
5.a. Proposal Editing Services (email ProposalEditing@asu.edu)	PI/RA/KE	3/3/2024	6/21/2024				
5.b. Research Development- Creating Graphics video/workshop	PI/RA/KE	3/3/2024	6/17/2024				
5.c. In-House Review Panels	PI/RA/DEPT.	3/3/2024	6/17/2024				

Grant Seeking Timeline + Process

GRANT PROPOSAL DEVELOPMENT TIMELINE Phase 1: Developing Your Idea/ Phase 2: Grant Proposal Phase 3: Submission **Gathering Intelligence** Writing Preparation Finalize research narrative · Prepare one-page summary Confirm grant opportunity · Prepare pitch Prepare research narrative · Finalize supplementary docs Secure collaborators Prepare supplementary docs Finalize budget Seek feedback/refine ideas Early budget development · Obtain collaborator approvals · Seek feedback Investigate grant opportunities · Prepare docs for submission ORSPA/internal review

Contact the Research Advancement team early in the process- we can help you during each phase.

Submit to sponsor

Grant Seeking Timeline + Process

GRANT PROPOSAL DEVELOPMENT TIMELINE MONTHS BEFORE SUBMISSION Phase 1: Developing Your Idea/ Phase 2: Grant Proposal Phase 3: Submission Gathering Intelligence Writing Preparation Finalize research narrative Prepare one-page summary Confirm grant opportunity Prepare pitch Prepare research narrative Finalize supplementary docs Secure collaborators Prepare supplementary docs Finalize budget Seek feedback/refine ideas Early budget development Obtain collaborator approvals Investigate grant opportunities Seek feedback Prepare docs for submission ORSPA/internal review Submit to sponsor

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5.c. In-House Review Panels	PI/RA/DEPT.	3/3/2024	6/17/2024		



Malign Foreign Talent Recruitment Program

- (1) each covered individual listed in the proposal for a research and development award certify that they are not a party to a malign foreign talent recruitment program from a foreign country of concern in their proposal submission and annually thereafter for the duration of the award; and
- (2) each institution of higher education or other organization applying for such an award certify that each covered individual who is employed by the institution of higher education or other organization has been made aware of the requirement under this section

Malign Foreign Talent Recruitment Program

Definitions:

"covered individual"

- (A) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and
- (B) is designated as a covered individual by the Federal research agency concerned

"Foreign country of concern" means the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country deemed to be a country of concern as determined by the Department of State.



Malign Foreign Talent Recruitment Program

"Malign foreign talent program" means any program, position, or activity that includes compensation, including cash, research funding, promised future compensation, or things of value, directly provided by the foreign state at any level (national, provincial or local) or other foreign entity, whether or not directly sponsored by the foreign state, to the targeted individual in exchange for the individual—

- (A) transferring intellectual property, materials, or data products owned by a U.S. entity or developed with a Federal research and development award exclusively to the foreign country's government or other foreign entity regardless of whether that government or entity provided support for the development of the intellectual property, materials, or data products;
- (B) being required to recruit students or researchers to enroll in malign foreign talent programs sponsored by the foreign state or entity; or
- (C) establishing a laboratory, accepting a faculty position, or undertaking any other employment or appointment in the foreign state or entity contrary to the standard terms and conditions of a Federal research and development award.



Audience Discussion

- What sponsor policy updates have impacted your work?
- What did you, your team, and/or your office do to communicate, educate and implement?
- Successes? Failures?



Uniform Guidance



OFFICE OF THE PRESIDENT OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, D.C. 20503

April 4, 2024

M-24-11

MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Shalanda D. Young Shalanda D. Yang

SUBJECT: Reducing Burden in the Administration of Federal Financial Assistance

The Biden-Harris Administration is making it possible for recipients of Federal funding to focus more on the people they serve and to deliver results for their communities. This Memorandum builds on previous efforts by providing direction to Federal agencies on improving the management of Federal financial assistance to ensure the consistent implementation of Federal financial assistance policy.¹

This Administration continues to focus on efforts to streamline, simplify, and make more accessible the processes, systems, and data standards associated with Federal financial assistance to reduce burden on Federal agencies, applicants, and recipients. The American people are our customers and their experiences are central to the design of products and processes to deliver services. Government must also work to deliver services more equitably and effectively, especially for those who have been historically underserved.²



Uniform Guidance

Summary of Changes

- · Increase the Single Audit threshold to \$1 million from \$750,000
- · Increase the de minimis indirect cost rate percentage to 15% from 10%
- · Increase the threshold used to define a capital expenditure to \$10,000 from \$5,000
- · Increase the exclusion threshold of subawards to \$50,000 from \$25,000 under modified total direct costs.
- · Use the term "recipient" or "subrecipient" in lieu of "non-federal entity" throughout Subpart A to Subpart E.
- Second-tier subrecipients or contracts are not required to obtain a Unique Entity Identifier (UEI) and register in SAM.gov. The federal agency may use discretion when determining if beneficiaries are required to obtain a UEI and register on SAM.gov.
- · Federal agencies provided with the option to allow recipients an additional 90 days to obtain a UEI and register on SAM.gov if circumstances persist.
- Removal of items currently included in the listing of prior written approval requirements. Items removed include real property, equipment, direct costs, entertainment costs, exchange rates, memberships, participant support costs, selling and marketing costs, and taxes.

<u>Uniform Guidance _Reference Guides FINAL 4-2024.pdf (cfo.gov)</u>

Uniform Guidance - Budget impacts



Audience Discussion

- How will these potential UG updates impact your work?
- What do you anticipate you, your team, and/or your office will need to do to communicate, educate and implement?
- For those active in Pre-Award administration a decade ago, any lessons learned from UG implementation?





Two Examples

Central-Internal system

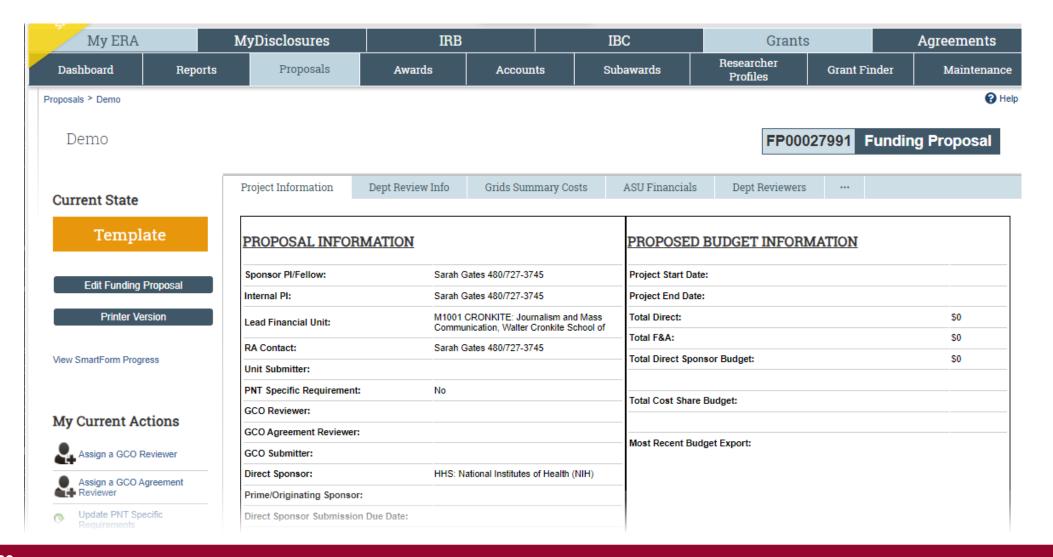
S2S submissions, NIH Forms

Dept. SciENcv

 Sponsor requirement->System requirement->PI use and knowledge



Internal Systems





Internal Systems



NIH Forms Implementation into System-to-System platforms:

Six Months out: Sponsor Announcement! "Applicants applying to NIH funding opportunities with due dates on or after January X must use updated application forms and instructions identified with a Competition ID of "FORMS-...". Central office alerts inhouse software development team.

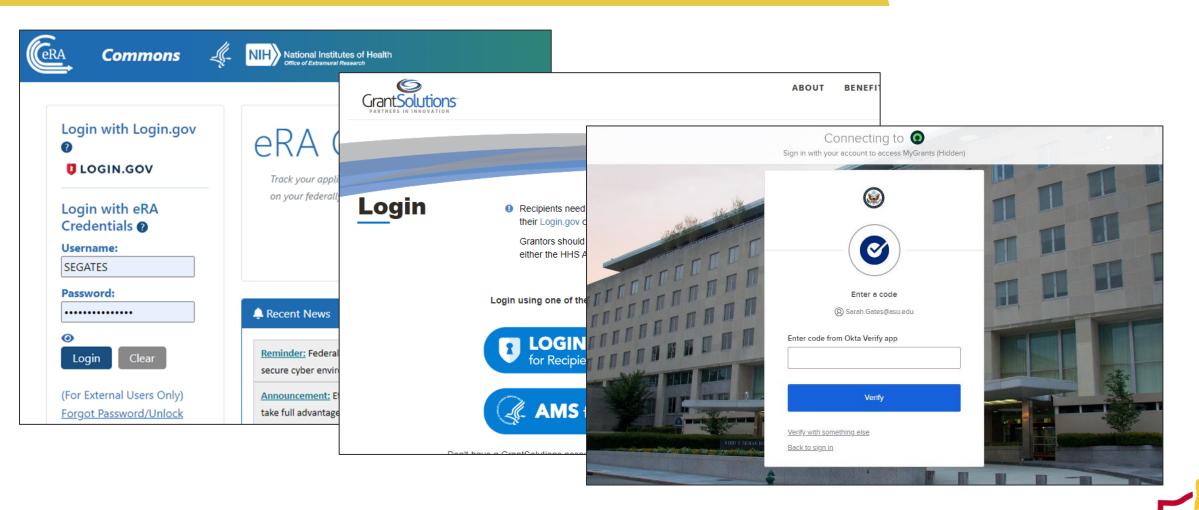
Five Months out: Software patch scheduled to include support for new forms, permitting users to have access to functional S2S forms. Development team begins analysis of updates.

Two Months out: Software patch is released, and testing begins. Stakeholders from Research Administration and Central Office are given scenarios to run in testing platform.

One Month out: Testing concludes and updated forms put into production. Announcement made to Research Administration community.

Weeks leading up to requirement deadline: Extra care in ensuring correct forms are used for the deadline. Applications prepared prior to update may require 're-doing' if submitting to a deadline requiring new forms.

External Systems



SciENcv





Impacts





Audience Discussion

- What internal or external portal updates have impacted your process?
- What do you, your team, and/or your office do to communicate, educate and implement?





Two Examples

Data Security

Proposal requirements

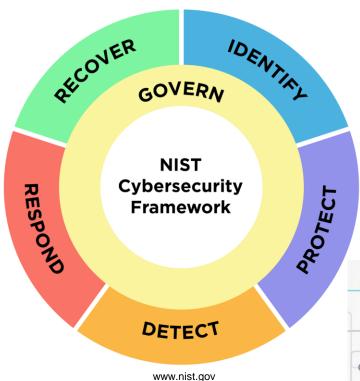
Artificial Intelligence

NSF & GAI





Data Security



DFARS Clause 252.204-7012 requires contractors/subcontractors to:

- 1) Safeguard covered defense information
- 2) Report cyber incidents
- 3) Submit malicious software
- 4) Facilitate damage assessment

business.defense.gov







NSF Webinar, PAPPG 24-1 Changes

Use of Generative Artificial Intelligence Technology in the Merit Review Process

- In mid-December 2023, NSF Issued a <u>Notice to the Research</u> <u>Community</u> with guidelines for safeguarding the integrity of the development and evaluation of proposals in the merit review process.
- Use of Generative AI by Reviewers
 - NSF reviewers are prohibited from uploading content from proposals, review information and related records to non-approved AI tools.
- Use of Generative AI in Proposal Preparation
 - Proposers are encouraged to indicate in the project description the extent to which, if any, generative AI technology was used to develop their proposal.



NCURA AI Series



Audience Discussion

- Have you reviewed the available material on AI? Takeaways?
- Have Pl's started using this?
- How have advancements in technology or data protections

impacted your work?



Resources

• NCURA AI Series







