## Personnel Screening for Research with Sensitive Information – New Process

Many DoD-funded research contracts and subcontracts require ISU to implement an information security standard for projects involving CUI (Controlled Unclassified Information). One component of the security standard is a background check for all personnel with access to protected information. IT Security initiates the background screening as part of the security planning process at the outset of relevant awards. Background checks are valid for three years and for all applicable projects during that time. Any questions can be directed to Ciaran Bowe (Security Compliance Manager, IT Security, cbowe@iastate.edu).

Budgeting for Graduate Assistant Tuition

Graduate assistant tuition is allowable and budgeted on sponsored projects because ISU has an institution-wide policy to provide tuition remission in lieu of compensation to all eligible graduate assistants regardless of funding source. Tuition remission is part of the graduate assistant's total support package. ISU is required by 2 CFR 200 to submit proposal budgets using consistent policies for cost items, including tuition. One of these consistent costing policies is that tuition must be budgeted along with graduate assistant stipends, as long as the sponsor allows for the payment of tuition. Therefore, tuition is budgeted in line with the graduate assistantship stipend effort level, meaning that if 12 months of stipend is budgeted, then 12 months of tuition is budgeted at the same effort level. Summer tuition must also be budgeted in line with the graduate assistant stipend effort level.

OSPA sometimes see instances where a PI would like to budget only stipend and fringe for a graduate assistant or only budget one credit of summer tuition. These practices are not allowed in proposal budgeting. As ISU is required to have consistent budgeting policies, OSPA will not approve proposal budgets that are inconsistent and do not follow established ISU policies.
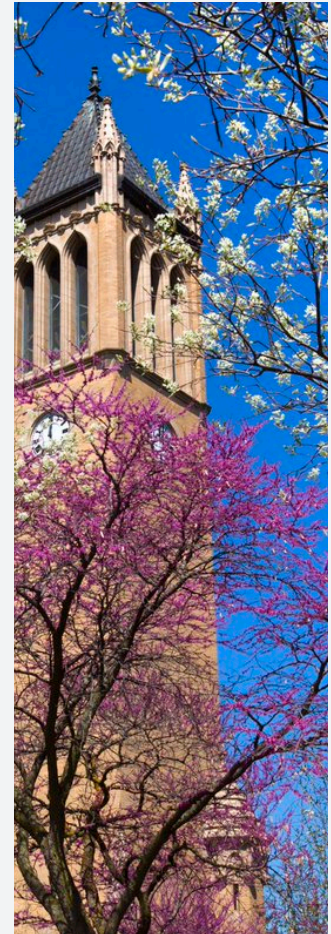
Office of Sponsored Programs Administration

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Subrecipient Agreement Information and Process

OSPA issues more than 400 subrecipient agreements and amendments each year. The complexity of the prime agreement, the subrecipient entity type, and the subrecipient monitoring required by Uniform Guidance all factor into the amount of time needed to issue a subrecipient agreement. When an award is received by ISU that includes funding for subawards to other institutions, the PI submits a Subrecipient Request Form to initiate the subaward process. This form must be completed and submitted before work on the subrecipient agreement is initiated by OSPA or OIPTT.

If the project is funded from federal or federal flow-through funds, a Subrecipient Information Questionnaire will be sent by OSPA/OIPTT to the subrecipient to collect information about the subrecipient institution and their work on the project. Potential issues may surface during this time (e.g. need for COI plan, assessment of financial capability, documentation of indirect cost rate, sponsor approval, compliance approval, etc.) that will delay execution of a subrecipient agreement.

It may take several weeks from OSPA/OIPTT's receipt of the Subrecipient Request Form to begin work on the monitoring and drafting of the subrecipient agreement. This is due in part to OSPA and OIPTT placing a higher priority on the processing of incoming funds. The KC Negotiation Report in eData is the best immediate way to check on OSPA's progress, and feel free to contact your OSPA Award Administrator directly if you haven't seen any subrecipient communications in at least two weeks.

Please bookmark the OSPA Forms website (https://www.ospa.iastate.edu/forms) so you can download the most current version of forms such as the Subrecipient Request Form and ISU Guidelines for Subrecipient vs. Consultant-Contractor-Vendor.

When a Terms & Conditions (T&C) Exception Letter is Needed for Proposal Submission

There are certain instances when the OSPA Awards Team or OIPTT Industry Team review of contract terms and conditions is required at the proposal stage. A "T&C Exception Letter" is prepared by the OSPA Awards Team or OIPTT Industry Team and this letter is submitted along with the proposal to indicate objections to terms that ISU cannot agree to and/or propose alternate language. If an Exception Letter is not submitted, ISU is agreeing to all terms and conditions as provided in the solicitation. Preparation of an Exception Letter adds significant time to receiving GoldSheet approval to submit. It is very important to adhere to the OSPA timeline for GoldSheet routing by ensuring these proposals arrive in OSPA at least four days before the proposal deadline.

Below are a few key words and phrases to look out for when reading sponsor proposal guidelines and solicitation materials which indicate the need for an Exception Letter:

- Guidelines indicate a sample contract and/or terms and conditions are provided and exceptions are needed at the time of proposal

- Contract terms need to be reviewed at time of proposal

- Federal sourced funding with BAA, Bid, Contract, Quote, RFQ, or Solicitation & Offer wording

- Federal contract terms are referenced (e.g. FAR or DFARS clauses)

SPECS Update

The Sponsored Programs Education and Certification Sessions (SPECS) are on hiatus. OSPA and SPA will make a decision about when to offer SPECS again once we have returned to campus. We anticipate that SPECS will be offered again starting in the Spring or Fall of 2022.