

presents

Tools for the Departmental Administrator

Online Education Program

Thursday, June 12, 2003

12:30 PM - 2:00 PM Eastern 11:30 AM - 1:00 PM Central 10:30 AM - 12:00 Noon Mountain 9:30 AM - 11:00 AM Pacific

Presented By:

Bob Killoren Michele Codd Celia Gravely

Tools for the Departmental Administrator

NCURA - Online Education Program

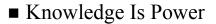
Moderator: Bob Killoren, Penn State University Michele Codd, Vanderbilt University Celia Gravely, University of Florida

Tool Time!

- Why do I need tools?
 - Too much work, too little time
 - Don't reinvent the wheel
 - Accuracy and Validity



Power Tools





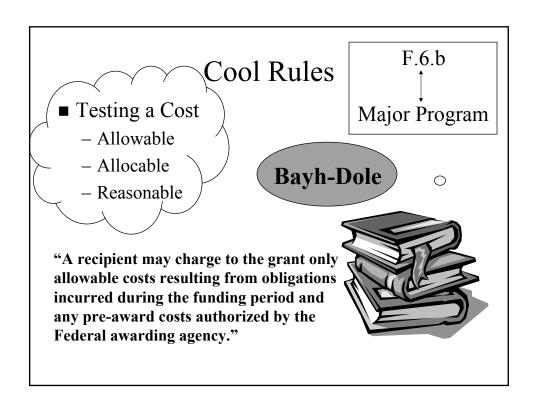
■ Electronic Tools Rule



Rules as Tools

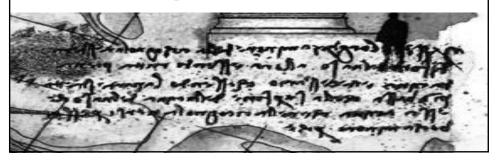
- OMB Circulars
 - A-110 and A-21
- Code of Federal Regulations (CFR)
- Federal Acquisition Regulations (FAR)
- Agency Policy Manuals





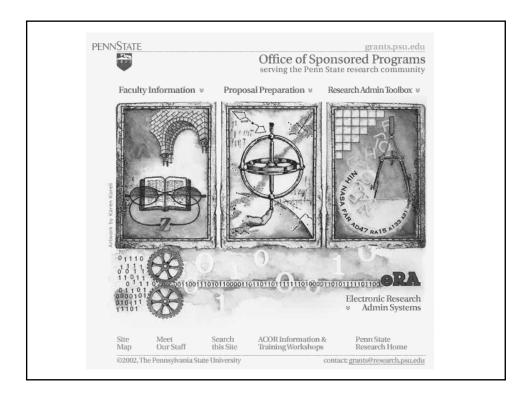
Home Grown Rules

- A-110
 - "written procedures..."
 - "written procedures..."
 - "written procedures..."
 - "written procedures..."



Web Power

- Build Your Own Tool Box
- Borrow Someone Else's Tool Box (and forget to return it!)
- Build It with "Lincoln Logs"
 - Build you website by putting a LINK IN your website to someone else's good stuff



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Faculty Information × Proposal Preparation × Research Admin Toolbox × eRA ×



Research Administration Toolbox

OMB Circulars

Grants Regulations

Contract Regulations

Misc. Regulation Standards

University Research Agreements

Research Protections

Intellectual Property

Integrity

Conflict of Interest



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Faculty Information > Proposal Preparation > Research Admin Toolbox > eRA >



Research Administration Toolbox

Miscellaneous Regulation Standards

Code of Federal Regulations

Code of Federal Regulations Search Engine

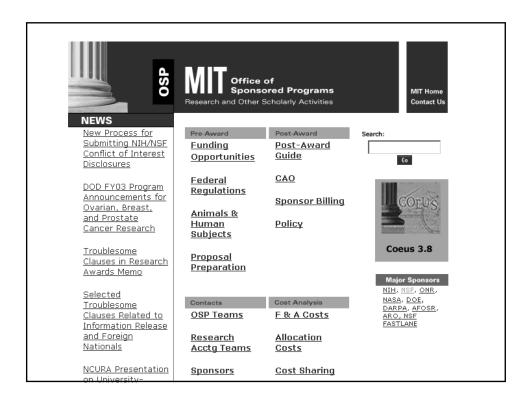
Bayh-Dole Act (37 CFR 401)

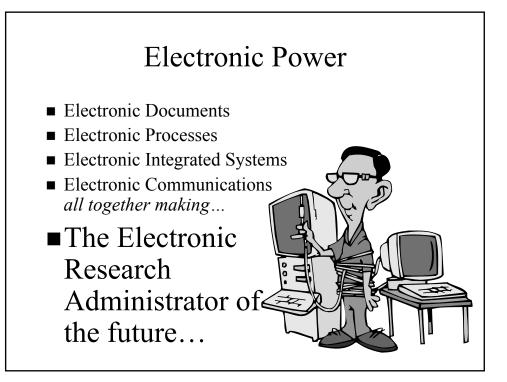
Cost Accounting Standards

Cost Accounting Standards for Universities -A-21 Appendix A

General Cost Accounting Standards

Links marked with this icon require the free Adobe Acrobat Reader.





Tools for the Departmental Administrator

■ Questions and Answers

Tools for the Departmental Administrator

Homegrown Tools

and
Information Gathering

Michele Codd Vanderbilt University

Homegrown Tools-Why Do I Need Them?

You probably have.....

- Multiple responsibilities
- Numerous complex tasks
- Changing rules
- Constant deadlines
- Not enough Time or Staff

Homegrown Tools-What to Use?

- Good Email program
- Computer calendar
- Spreadsheet program
- Database
- Integrated Word Processor
- Anything that streamlines your work

Homegrown Tools-Do I have Time to Do This?

 It's Worth the Investment of time



- You create a balance between daily tasks and long term projects
- Proactive, not Reactive

Homegrown Tools-Our Environment

- \$7.8 Million in contracts-31 Projects
- 5 Faculty, 35 Research staff, 32 students in two locations
- 50 Non-US Citizens
- 3 Administrative Staff



Homegrown Tools-Sample of Our Tools

- VU-Web Access to Monthly Grant balances and transactions
- Shared calendars schedule resources
- Excel workbook financial tracking
- Access database project management
- PDF forms- avoid typing!

Homegrown Tools-Sample of Our Tools

Individual spreadsheets record effort and expenditures

	Α	В	R	BB	BF	BU	DN	DO	DP	DQ
1								Actual Labor Cost	Funding blocks (SWFB)	Balance
	4-22-421-									
2	7125		Beatrice	Jason G.	Jeff	Larry				
3	2000	Jan-00	50%	60%	100%	90%		\$16,964	\$133,591	\$116,627
4		Feb-00	50%	35%	100%	90%		\$13,950		\$102,677
5		Mar-00	50%	60%	100%	100%		\$16,166		\$86,511
6		Apr-00	50%	20%	100%	100%		\$14,034		\$72,477
7		May-00	50%	0%	100%	100%		\$12,969		\$59,508
8		Jun-00	50%	0%	100%	0%		\$4,102		\$55,407
9		Jul-00	0%	0%	0%	0%		\$0		\$55,407
10		Aug-00	0%	0%	0%	0%		\$0		\$55,407
11		Sep-00	0%	0%	0%	0%		\$0		\$55,407
12		Oct-00	0%	0%	0%	0%		\$0		\$55,407
13		Nov-00	0%	0%	0%	0%		\$0		\$55,407

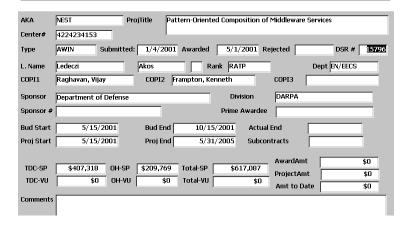
Homegrown Tools-Sample of Our Tools

Spreadsheets are combined to manage total funding

Budget Summary		1	2		3		4		5	R	lonthly esearch		otal Balance Available		New Research	Burn F	tate	Diffe	rence
										Labor Cost				Funding					
	Sep-02	\$ 53,305	\$ 55,319	\$	49,886			\$	101,797	\$	232,074	\$	1,439,726	\$	232,074	\$ 1,495	,133	\$ 1,26	33,05
	Oct-02	\$ 52,081	\$ 43,256	\$	147,820	\$	300,873	\$	95,862	\$	232,529	\$	1,864,519	\$	232,529	\$ 1,919	,926	\$ 1,68	37,39
	Nov-02	\$ 50,856	\$ 31,194	\$	142,186	\$	300,873	\$	84,644	\$	249,012	\$	1,615,507	\$	249,012	\$ 1,670	,914	\$ 1,42	21,90
	Dec-02	\$ 49,632	\$ 141,118	\$	136,551	\$	300,873	\$	73,148	\$	253,642		1,492,174	\$	253,642	\$ 1,547	,581	\$ 1,29	93,93
2003	Jan-03	\$ 48,407	\$ 128,778	\$	120,663	\$	300,873	\$	66,935	\$	302,304	\$	3,076,974	\$	302,304	\$ 3,132	,381	\$ 2,83	30,07
	Feb-03	\$ 47,182	\$ 116,438	\$	104,775	\$	300,873	\$	60,722	\$	298,281	\$	2,778,693	\$	298,281	\$ 2,834	,099	\$ 2,53	35,81
	Mar-03	\$ 45,958	\$ 258,048	\$	88,887	\$	300,873	\$	54,509	\$	298,281	\$	2,634,362	\$	298,281	\$ 2,689	,768	\$ 2,39	91,48
	Apr-03	\$ 44,733	\$ 245,709	\$	72,999	\$	300,873	\$	48,296	\$	298,281	\$	2,521,506	\$	298,281	\$ 2,576	,913	\$ 2,27	78,63
	May-03	\$ 43,509	\$ 233,369	\$	57,111	\$	300,873	\$	42,083	\$	298,281	\$	2,223,225	\$	298,281	\$ 2,278	,632	\$ 1,98	30,35
	Jun-03	\$ 24,224	223,299	\$	41,223	\$	300,873	\$	39,231	\$	277,846		1,710,786	\$	277,846	\$ 1,766		\$ 1,48	
	Jul-03	\$ 23,000	\$ 213,228	\$	25,335	\$	284,065	\$	-	\$	256,935	\$	1,457,760	\$	256,935	\$ 1,513	,166	\$ 1,25	56,23
	Aug-03	\$ 79,033	\$ 203,158	\$	9,447	\$	267,257	\$		\$	256,935	\$	1,301,222	\$	256,935	\$ 1,356	,628	\$ 1,09	99,69
	Sep-03	\$ 77,809	\$ 190,818	\$	(6,441)	\$	267,257	\$	-	\$	236,764	\$	1,320,699	\$	236,764	\$ 1,376	,106	\$ 1,13	39,34
	Oct-03	\$ 76,584	\$ 178,478	\$	389,809	\$	968,995	\$	-	\$	345,942	\$	2,477,030	\$	345,942	\$ 2,532	,436	\$ 2,18	36,49
	Nov-03	\$ 75,359	\$ 166,139	\$	373,921	\$	968,995	\$		\$	236,330	\$	2,283,838	\$	236,330	\$ 2,339	,245	\$ 2,10	02,91
	Dec-03	\$ 74,135	\$ 153,799	\$	358,033	\$	968,995	\$	-	\$	236,330	\$	2,090,647	\$	236,330	\$ 2,146	,054	\$ 1,90	09,72
2004	Jan-04	\$ 72,910	\$ 141,459	\$	347,631	\$	968,995	\$		\$	201,139	\$	2,559,832	\$	201,139	\$ 2,559	,832	\$ 2,35	58,69
	Feb-04	\$ 71,686	\$ 129,119	\$	337,228	\$	968,995	\$	-	\$	224,904	\$	2,404,638	\$	224,904	\$ 2,404	,638	\$ 2,17	79,73
	Mar-04	\$ 70,461	\$ 		326,825	\$	968,995	\$	-		188,799		2,132,665	\$	188,799	\$ 2,132		\$ 1,94	
	Apr-04	\$ 69,236	\$ -	\$	316,423	\$	968,995	\$	-	\$	188,799	\$	1,989,811	\$	188,799	\$ 1,989	,811	\$ 1,80	01,01
	May-04	\$ 68,012	\$	\$	260,803	\$	968,995	\$	-	\$	192,446		2,111,573	\$	192,446	\$ 2,111	,573	\$ 1,91	
	Jun-04	\$ 43,272	\$ -	\$	196,455	\$	968,995	\$	-	\$	233,769	\$	1,923,749	\$	233,769	\$ 1,923	,749	\$ 1,68	39,98
	Jul-04	\$ 42,047	\$ -	\$	143,018	\$	968,995	\$	-	\$	181,921	\$	1,620,496	\$	181,921	\$ 1,620	,496	\$ 1,43	38,57
	Aug-04	\$ 100,737	\$ -	\$	89,581	\$	968,995	\$	-	\$	179,470	\$	1,547,134	\$	179,470	\$ 1,547	,134	\$ 1,36	
	Sep-04	\$ 99,512	\$ -	\$	33,961	\$	968,995	\$		\$	165,467	\$	1,522,861	\$	165,467	\$ 1,522	,861	\$ 1,35	57,39

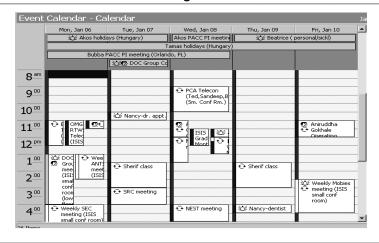
Homegrown Tools-Sample of Our Tools

Database tracks proposals, awards, target dates



Homegrown Tools-Sample of Our Tools

Calendar schedules and manages events, absences, resources



Homegrown Tools-Sample of Our Tools

We create iPDF forms for forms we use regularly

Project/Proposal Title:

Source of Support.
Total Award Amount: \$ Total Award Period Covered:
Location of Project.
Person-Months Per Year Committed to the Project. Cal: Acad: Sumr:

Support: __Current __Pending __Submission Planned in Near Future ___*Transfer of Support
Project/Proposal Title:

Source of Support:
Total Award Amount: \$ Total Award Period Covered:
Location of Project.
Person-Months Per Year Committed to the Project. Cal: Acad: Sumr:

Support: __Current __Pending __Submission Planned in Near Future __**Transfer of Support

Information Gathering

we have a lot of information to gather

Research

- University Rules
- Agency Rules
- •OMB
- Humans (OHRP)
- Animals (OLAW)
- Technology Transfer
- •INS/ VISA
- •CDC, FDA

Management

- Employees
- Students
- Space and Facility
- •Visa
- Purchasing
- Travel
- Public Relations
- Events

Information Gathering-Where Do I start?

- Specific Web sites
- NCURA
- University Central Offices
- Peers at your university and others
- Information repositories (COS)



Information Gathering-Now What Do I Do?

- Bookmark web sites
- Keep names, numbers, emails of knowledgeable people (and the other kind)
- Create a procedure manual for essential tasks
- Create an on-line shared resource

Information Gathering-What Is Important?

- Is it clear
- Is it useful
- Is it necessary
- Can I retrieve it easily



Information Gathering

Is this my responsibility?



Tools for the Departmental Administrator

■ Questions and Answers

Tools for the Departmental Administrator

Business Systems and Training Staff

Celia Gravely University of Florida

Business Systems

- Why do you need a business system?
- Who needs to use the system?
- What do you need the system to do?

Business Systems

About my department --

- \$28 million annual budget
- About 50% from clinical revenue
- About 45% from extramural funding
- about 5% from state general revenue
- 7 employees provide administrative and fiscal support for all fund sources

Business Systems

About my department --

- 62 faculty members
- ~250 employees total
- working from 4 fund sources, all using different accounting packages

Business Systems

Staff were:

- managing in 4 different accounting systems
- managing with 4 different sets of rules

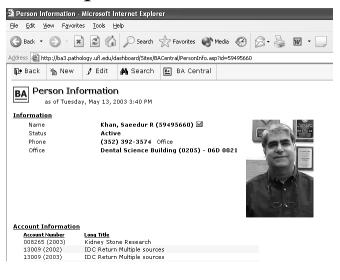


Business Systems

We purchased business management system that allowed us to:

- provide web interface for fiscal tracking by all staff and faculty
- streamline tasks
- realize efficiencies from work flow management

Example of Web interface:



On down the page:

Project	Budget\$ En	c Remaining \$	Expenditures \$	Uncommitted 6
Khan-Flex	\$ 4,096	\$ 0	\$ 1,229	\$ 2,86
Total	\$ 4,096	\$ 0	\$ 1,229	\$ 2,86
Galary / Effort				
Assignment 1 (INST)				
Account #	Short Name	Sa	lary Distribution	<u>Until</u>
290830176 (2003)	AEF-Pathology		100.00%	06-30-2003
Total			100.00%	
Assignment 2 (INST)				
Account #	Short Name	<u>\$</u>	lary Distribution	<u>Until</u>
290800131 (2003)	PATHOLOGY-IN	ST	48.00%	06-30-2003
296448212 (2001)	TISSUE-CRYST	AL I	31.00%	06-30-2003
296452512 (2001)	Role of Biopoly	m	21.00%	06-30-2003
Total			100.00%	

Business Systems

Allows you to track to transaction level

- Allows you to put in place business rules for expenditures
- Allows you to monitor on a dynamic basis
- Can be viewed by faculty any place, anytime
- Reduces reporting required of staff

Business Systems

- Conduct needs analysis
- Survey staff and faculty
- Prioritize needs
- Get buy-in from top to bottom



Training Staff

Staff need specific types of training:

- general skills
- specific skills
- enrichment
- career development

Training Staff

- Institutional Offerings
- On-the-job training
- Attendance at Seminars

Training Staff

Institutional Offerings

Employee Training

Training and Development offers a suite of programs and services designed to enhance the personal and professional development of the UF workforce. Whether you're seeking skills training, personal exploration and development, ways to maximize your team's potential, or ongoing formal education, the University of Florida offers a wide array of opportunities.

REGISTER NOW! Summer 2003 Training Programs

Each semester, Training and Development provides free courses and certification in a variety of areas including computer software, supervisory and leadership skills, faculty development, UF systems, and more. We also partner with other areas of campus including the EAP and University Retirement to sponsor programs, as well as the Office of Affirmative Action to sponsor the Mini-Conferences on Sexual Harassment.

Training Staff

On the Job Training can include:

- review of procedures
- review of manuals
- one-to-one training
- have staff assist with writing of procedures and policies
- training via Web-Cast presentations

Training Staff

Seminar attendance:

- Professional societies like NCURA are recognizing the need for training of departmental staff
- Local offerings in your area
- Check with Chamber of Commerce for professional organizations in your area

Tools for the Departmental Administrator

- Thank you for participating in today's Online Education Program (OEP)!
- The next OEP is scheduled for July 10. Visit the NCURA website (www.ncura.edu) for details!
- All remaining questions please submit to <u>lessin@ncura.edu</u>. All answers will be forwarded to all registrants in a few days.

Definitions and Regulations Involved in the Classified-Sensitive Information-Unclassified Debate

Classified Research:

Executive Order 12958, issued on April 17, 1995, prescribes a uniform system for classifying, safeguarding, and declassifying national security information. Information may only be classified if certain conditions are met

There are seven classification categories listed in section 1.5, the fifth of which is "scientific, technological, or economic matters relating to the national security." "National security" is defined as "the national defense of foreign relations of the United States"

Later, in section 1.8b, EO 12958 reiterates that basic scientific research information not clearly related to the national security may not be classified.

Classified projects are not published in open literature. Information is transferred only between those who obtain the required clearance. This applies even when the research is performed by scientists outside of government facilities.

Many universities do not accept classified projects. Many of those that do conduct research in facilities separate from the main campus. Sensitive Information Definitions:

Sensitive Unclassified Information: The Computer Security Act of 1987 (PL 100-235) established requirements for protection of certain information on Federal Government automated information systems. This information is referred to as "sensitive" information, defined in the act as: "Any information the loss, misuse, or unauthorized access to or modification of which could adversely affect the national interest or the conduct of Federal programs or the privacy to which individuals are entitled under [the Privacy Act] but which has not been specifically authorized under criteria established by an Executive Order or an Act of Congress to be kept secret in the interest of national defense or foreign policy."

Sensitive, But Unclassified: The Department of State describes "sensitive, but unclassified" information as: "...information which warrants a degree of protection and administrative control that meets the criteria for exemption from public disclosure set forth under ... the Privacy Act." This is a document designation comparable to For Official Use Only. The Department of Defense also maintains several types of controlled, unclassified information but those too are similar to For Official Use Only.

Sensitive, But Unclassified Technical Information: The Department of Energy's use of "sensitive, but unclassified" is described as: "Information for which disclosure, misuse, alteration or destruction could adversely affect national security or government interests. National security interests are those unclassified matters that relate to the national defense or foreign relations of the Federal Government. Governmental interests are those related, but not limited to, the wide range of government or government-derived economic, human, financial, industrial, agricultural, technological, and law enforcement information, as well as the privacy or confidentiality of personal information provided to the Federal Government by its citizens."

Sensitive Homeland Security Information: OSTP Director Jack Marburger defined sensitive homeland security information during an October 10, 2002 appearance before the House Science Committee as "not a new category of information; rather it is the type of information that the government holds today which is not routinely available to the general public, such as law enforcement data and critical computer security threats or vulnerabilities."

Controlled but Unclassified: The Department of Defense has several categories of information called "controlled, but unclassified."

Regulations: In the physical sciences, the distinction between what is harmful and what is not is relatively clear. This in part stems from the fact that those in the physical sciences have been dealing with these issues since World War II. It is more difficult to draw a distinction between knowledge that helps advance biomedical science and knowledge which can be used for deadly acts of bioterrorism. This makes it much more difficult to determine when and if information should be restricted. As a result, the regulations listed below focus mostly on the physical sciences, except for the last item which is the newest.

Export Administration Regulation (EAR): The Department of Commerce implements the EAR which bar the export of items, technology, and technical information found on the Commerce Control List to foreign countries without appropriate export license. EAR covers the transfer of dual-use commercial goods. Dual-use technologies are those that have both a legitimate civilian and military use.

International Traffic in Arms Regulation (ITAR): The Department of State implements the ITAR which regulate the export of items on the Munitions Control List and technical information about them. Because technologies for space science are similar to those for military space applications, space scientists have encountered problems with exchange of items, information, and collaborations with foreign colleagues, students and faculty. A March 2002 State Department change to ITAR attempted to ameliorate these problems by giving universities, in limited cases involving NATO and major non-NATO allies, an exemption for certain items and defense services based on 'public domain' information.

Both EAR and ITAR possess exemptions for "fundamental research." Both restate the NSDD-189 definition of fundamental research as "... basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community," as distinguished from research the results of which are restricted for proprietary reasons or specific U.S. Government access and dissemination controls. University research is not considered fundamental research if: (i) The University or its researchers accept other restrictions on publication of scientific and technical information resulting from the project or activity, or (ii) The research is funded by the U.S. Government and specific access and dissemination controls protecting information resulting from the research are applicable.

A **deemed export** is transfer of information about controlled technologies to foreign nationals in the United States. Deemed exports may be regulated under the EAR (non-defense and dual-use technologies) or the Energy Department (information about special nuclear materials). ITAR refers to transfers of technical data to foreign nationals, whether in the US or abroad, as **defense services**.

Agency contract clauses: Periodically, agencies insert new, restrictive language in contracts with universities. Most recently, restrictions on the participation of foreign nationals and/or on the disclosure of information have appeared in Department of Defense contracts. COGR has been compiling a list of these restrictions and is engaged in ongoing discussions with DOD and the Army about these clauses. The Army already has revised the new 4401 clause on release of Information once in response to university concerns, and is considering a further revision.

Since 1998, HHS regulations have restricted the transfer of certain biological agents and toxins ("select agents") to registered organizations, which included many universities. The select agent list consists of certain deadly viruses, bacteria, rickettsiae, fungi, and toxins and is determined by the Secretary of HHS. The USA PATRIOT Act (PL 107-56) prohibited possession of these agents, except by registered organizations, and barred access to these select agents by several classes of individuals, including those originating from countries which sponsor terrorism. The Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (P.L. 107-188) subsequently required institutions possessing select agents to improve security and access controls to the agents, develop a current inventory of those agents, and register their possession with HHS and USDA. Interim final regulations implementing PL 107-56 and 107-188 went into effect on February 11, 2003, and are found at 42 CFR 73. This is a new area of regulation and many of the processes and requirements are not yet clear.

Unclassified Research:

NSDD-189, issued September 21, 1985, states the national policy for controlling the flow of science, technology and engineering information produced in federally funded fundamental research at colleges. universities, and laboratories, NSDD-189 states, "to the maximum extent possible, the products of fundamental research remain unrestricted. It is also the policy of this Administration that, where the national security requires control, the mechanism for control of information generated during federally funded fundamental research in science, technology and engineering at colleges, universities and laboratories is classification. Each federal government agency is responsible for: a) determining whether classification is appropriate prior to the award of a research grant, contract, or cooperative agreement and, if so, controlling the research results through standard classification procedures: b) periodically reviewing all research grants, contracts or cooperative agreements for potential classification. No restriction may be placed upon the conduct or reporting of federally funded fundament research that has not received national security classification, except as provided in applicable U.S. Statutes."

NSDD-189 defines fundamental research as: "basic and applied research in science and engineering, the results of which ordinarily are published and shared broadly within the scientific community, as distinguished from proprietary research and from industrial development, design, production, and product utilization, the results of which ordinarily are restricted for proprietary or national security reasons."

Policy Unchanged: NSDD-189 has not been superceded and continues to be the government policy. Assistant to the President for National Security Affairs Condoleeza Rice reaffirmed NSDD-189 on November 1, 2001 in a letter to Harold Brown, co chairman of the Center for Strategic and International Studies. She stated, "...this Administration will review and update as appropriate the export control polici8es that affect basic research in the United States. In the interim, the policy on the transfer of scientific, technical, and engineering information set forth in NSDD-189 shall remain in effect." OSTP Director Jack Marburger reaffirmed this position in a talk at the National Academy of Sciences on January 9, 2003.

FDP Prior Approval and Other Requirements July, 2000

AFOSR ARO

AMRMC

DOE

EPA

NASA

NIH

NSF

ONR

USDA

General Requirements Change in Scope Prior approval required Absence or Change of PI Prior approval required Need for Additional Funding Prior approval required Subaward of "significant part" of programmatic effort R R R R R R 3 Pre-award costs (90 days) Prior approval waived Pre-award costs (more than 90 days) Prior approval required No-cost extension (12 months) R R W W W R 6 No-cost extension (more than 12 months) Prior approval required Carry-forward of unexpended balances to subsequent funding periods W W W W W W Cost-related Requirements

Rebudgeting among budget categories		W	W	W	W	W	9	W	W	W	
Rebudgeting between direct and F&A costs	W	W	W	W	W	W	9	W	W	W	
Rebudgeting of funds allotted for training allowances (direct payment to trainees) to other categories of expense.	W	W	W	W	W	W	10	R	W	W	
Equipment not in approved budget	W	R	W	W	W	W	W	W	W	W	
Capital expenditures for improvement of equipment not in the approved budget	Prior approval waived										
Alterations and Renovations costing less than \$25,000	W	11	W	W	W	W	12	W	W	W	
Foreign Travel	W	R	W	W	W	W	W	W	W	W	
Inclusion of costs requiring prior approval in Cost Principles		W	W	W	W	W	13	W	W	W	
Faculty consulting compensation that exceeds base salary		Prior approval waived									
Restrictions on costs not explicitly unallowable under Cost Principles	none	none	none	14	none	none	15	none	none	16	

R Prior approval required. "Prior approval" means prior written approval from the sponsor. Prior approval can take the form of the sponsor's acceptance of the proposal and/or proposal budget and subsequent incorporation into the award, or written approval of a separate request submitted by the recipient.

- W Prior approval requirement waived
- 1 Waived except when subaward would be more than 25% of the total dollars of the award
- 2 Waived except when subawardee is foreign
- 3 Waived except when subaward(s) would be more than 50% of the total dollars of the award; required for any subaward to federal agencies
- 4 Waived except when award indicates funds obligated are restricted year funds
- 5 Waived except for extensions that would result in a project period in excess of five years
- 6 Waived only for first-time requests for extensions of 12 months or less
- 7 Uncommitted carryforward funds are to be included in the continuation proposal if they are "substantial."
- 8 Waived for carryforwards of less the 25% of the award; carryforwards of more than 25% are subject to review
- 9 Rebudgeting of more than 25% of the award is subject to review
- 10 Waived except for NRSA awards.
- 11 Waived, but is required for A&R in excess of \$25K, even if the A&R is accomplished with institutional funds designated as cost sharing
- 12 Waived for alterations and renovations costing up to \$300,000
- 13 Waived, but costs not specifically covered in the Circulars are subject to NIHGPS.
- 14 Interest penalties for late payment are not allowable
- 15 Prior approval required for patient care costs

FDP Prior Approval and Other Requirements July, 2000

AFOSR ARO AMRMC DOE EPA NASA NIH NSF ONR USDA

	AFUSK	ARU	AWKWC	DOE	LIA	INASA	INII	NOF	ONK	USDA
-related Requirements (cont.)										
Inclusion of unrecovered F&A costs as cost sharing					Per	mitted				
Transfer of funds between construction and non-construction	Prior approval required									
Use of program income earned during the project period			Fur	nds added	to the amo	unt availab	le for the p	roject		
Use of program income earned after the project period				No oblig	ation to the	e federal go	overnment			
erty-related requirements										
Title to supplies with value of more than \$5,000 at the end of a project	R	R	R	W	W	W	W	W	R	W
Acquire real property					Prior appro	oval require	ed			
Encumber real property acquired with federal funds					Prior appro	oval require	ed			
Use real property acquired with federal funds for other non-federal projects rather than compensating the federal government for its fair market value					Prior appro	oval require	ed			
Encumber equipment acquired with federal funds	Prior approval required									
Trade in equipment purchased with project funds to by replacement equipment	Permitted									
Own equipment upon acquisition without conditions or without obligation to the sponsor at termination of project	Permitted									
Funding agencies' rights in data	Not waived									
Use of valuation methods other than the lesser of book value or fair market value for contributed capital assets	Permitted									
Procurement requirements associated with the simplified acquisition threshold	Where				incorporate Simplified A					Purchase
Equipment threshold	Even if institutions establish a threshold for equipment lower than \$5,000, the FDP provisions relating to equipment apply only to those items costing \$5,000 or more.									
ect Management Requirements										
Monthly submission of Cash Transaction Reports when advances exceed \$1 million/year	Not required									
Up-front specification of interrelationship among projects					Not r	equired				
Publication acknowledgment and disclaimers	Required									
Additional requirements for use of human subjects beyond those imposed by federal law	none	none	17	none	none	none	none	none	none	none
Additional requirements for use ofanatomical substances beyond those imposed by federal law	none	none	17	none	none	none	none	none	none	none
Use of sponsor budget forms for budget revisions	18	18	18	18	18	18	19	20	18	Require
Use of electronic records to meet record retention requirements		-	-	-	Per	mitted	-	-	-	-

¹⁶ Non-working meals and compensation for harm to persons or property are unallowable; also unallowable for awards made under statutory authority cited in Article 3 of the ASR are: graduate assistant tuition remission, F&A in excess of statutory amount, and fixed and real property.

¹⁷ Army Surgeon General approval also required

¹⁸ Not required, but budget should be in same general format as original

¹⁹ Not required for SNAP awards; but others use "Next Period Budget" forms

²⁰ Required if not using FASTLANE

BASIC TYPES OF AWARDS

	GRANT	COOPERATIVE AGREEMENT	CONTRACT
Basic Purpose	Provides assistance with few restrictions	Provides assistance with substantial involvement between parties	Procures tangible goods and services
Solicitation Method	Application kit or guidelines	Request for Application	Request for Proposal or Quote
Award Instrument	Short, may refer to general conditions	Describes involvement, party relationships	Long, detailed specs, FAR clauses
Scope of Work	Conceived by PI	Conceived by PI	Conceived by Sponsor
Sponsor Involvement	Generally none	Substantial involvement	Approves activities; expected results
Rebudgeting	Flexible	Usually flexible	Can be more restrictive
Equipment Title	Grantee	Varies	Varies
Performance Period	Specified in grant	Specified in agreement	Specified in contract
Patent Rights	Bayh-Dole	Often Bayh-Dole; BUT!!!	Provision in contract (s/b 52-227-11)
Publications	May ask to be informed	May ask to be informed	May require review or approval
Technical	Annual summary report	Frequent reports	Detailed reports, often monthly

¶3103 Federal Agency Implementation of OMB Circular A-110

Agency	Issuance Date	Effective Date	CFR	Revisions/Additions/Notes	Comparison to A-110 as issued
Agriculture	Aug. 24, 1995 (60 FR 44121)	Aug. 24, 1995 (interim final)	7 CFR 3019	on February 17, 1998 (63 FR 7734), revised to include entitlement programs in implementation; however, this remains an interim final rule.	implemented nearly verbatim, but also included clauses for awards to commercial concerns
Commerce	Sept. 4, 1998 (63 FR 47155)	Oct. 1, 1998 (interim final)	15 CFR 14		very little change, retained prior approval for budget revisions.
Corporation for National and Community Service	Mar. 10, 1995 (60 FR 13055)	Mar. 10, 1995 (final)	45 CFR 2543		implemented verbatim
DOD	Mar. 12, 1998 (63 FR 122151)	Apr. 13, 1998 (final)	32 CFR 32		part of DOD Grant and Agreement regulations; encourages DOD grants officers to consolidate certification requirements; retained agency approval for one-time no-cost extensions; additional prior approval for rebudgeting actions on awards in excess of \$100,000 where rebudgeting will be 10% of budget and for transfer of funds between direct and indirect cost categories.
ED	July 6, 1994 (59 FR 34772)	Oct. 1, 1994 (final)	34 CFR 74, 77	on November 17, 1994 (59 FR 50589, further costing changes were included in the ED implementation; further amendments were made on September 6, 1995 (60 FR 46491)	limited indirect cost reimbursement to 8% for training grants; prohibited use of difference between actual indirect cost rates and 8% MTDC as cost sharing or matching
Energy	Oct. 21, 1994 (59 FR 53260)	Nov. 21, 1994 (interim final)	10 CFR 600		very few changes; allows unrecovered IDC to be used as cost sharing
EPA	Feb. 15, 1996 (60 FR 6065)	Mar. 18, 1996 (interim final)	40 CFR 30, 33		very few changes; inclusion of Hotel and Motel Fire Safety Act regulations (travel funds impact) and limitation on allowability of preaward costs as automatic institutional approval for research grants
GSA	Sept. 15, 1994 (59 FR 47268)	Sept. 15, 1994 (final)	49 CFR 105-72		adopted verbatim
HHS	Aug. 25, 1994 (59 FR 43754)	Aug. 25, 1994 (interim final) Mar. 22, 1996 (final)	45 CFR 74	issued as final with some non- substantive changes from interim status on Mar. 22, 1996 (61 FR 17743)	very few changes; remember that HHS agencies implemented further, such as NIH in its 12/23/94 NIH Guide

Agency	Issuance Date	Effective Date	CFR	Revisions/Additions/Notes	Comparison to A-110 as issued
HUD	Sept. 13, 1994 (59 FR 45010)	Oct. 13, 1994 (final and interim for part Subpart E only)	24 CFR 84	Subpart E as previously issued was adopted as final on June 20, 1995 (60 FR 32102)	no significant changes
Interior	Aug. 26, 1994 (59 FR 44040)	Aug. 26, 1994 (interim final)	43 CFR 12		made A-110 applicable to agreements with commercial organizations; significantly limited prior approval waivers
Justice	July 26, 1995 (60 FR 38241)	Sept. 26, 1995 (final)	28 CFR 70	corrections to the final rule were issued on November 24, 1995 (60 FR 57931)	only one significant change; equipment inventories required every year instead of A-110 requirement of every two years
Labor	July 17, 1994 (59 FR 38270)	July 27, 1994 (final)	29 CFR 95		no significant changes; incorporated commercial organizations and foreign governments into applicability; written approval required for moving funds from indirect to direct costs or viceversa; limited use of one-time, no-cost extensions
NASA	Oct. 19, 2000 (65 FR 62899)	Oct. 19, 2000	14 CFR 1260		no substantive revisions
Natl. Archives and Records Admin.	Oct.r 16, 1995 (60 FR 53514)	Nov. 15, 1995 (final)	36 CFR 1210	interim rule was finalized on February 13, 1996 (61 FR 566)	adopted nearly verbatim
NEH	November 2001 Web site: www.neh.gov	November, 2001	N/A		expanded authorities apply to all NEH grants; institutions must have a written organizational prior approval system; specific accounting records source documents
NSF	Apr. 25, 1994 (GPM Transmittal No. 9)	May 2, 1994 (final)	N/A		very little change, but did make applicable to commercial organizations; allowed unrecovered indirect costs to be used as cost sharing; some limitation of prior approval
State	Apr. 20, 1994 (59 FR 18730)	Oct. 1, 1994 (final)	22 CFR 145		no substantive revisions
Transportation	Apr. 4, 1994 (59 FR 15637)	Apr. 4, 1994 (interim final)	49 CFR 19		no substantive revisions
United States Information Agency	Aug. 3, 1994 (59 FR 39440)	Aug. 3, 1994 (interim final) October 4, 1994 (final)	22 CFR 513	interim rule issued as final on November 30, 1994 (59 FR 61272)	adopted verbatim

NOTE: As Federal statutes are enacted or revised, certain changes are automatic to A-110. For example, on August 29, 1997 (62 FR 45937), an interim final rule was issued to A-110 to implement the provisions of the 6/24/97 revision of OMB Circular A-133, which combined the former A-133 and A-128 audit circulars. Another statute change resulted in the threshold for the imposition of the Central Work Hours and Safety Standards Act to be effective at the \$100,000 grant award level. Likewise, other changes also have become or will become automatic, such as the redefinition of "simplified acquisition" (formerly called small purchase) threshold to \$100,000 and the requirement for all federal payments to become electronic as of 1/1/99.



National Council of University Research Administrators Program Evaluation



This form is electronically tallied. Please mark only one circle for each question.

Do not mark outside the circles.

Tools for the Departmental Administrator: June 12, 2003	URA7769-0
Scale Definition: P - Poor F - Fair G - Good VG - Very Good E - Excellent	
1. Overall rating of program	O O O O
2. Similarity of actual program content to advertised content	0 0 0 0
3. Ease of registration	0 0 0 0 0
4. Audio quality of seminar	0 0 0 0 0
Presenter: Overall Effectiveness	
5. Robert Killoren	00000
6. Michele Codd	0 0 0 0
7. Celia Gravely	0 0 0 0
Participant Information	
8. How many people listened at your site? O 1 O 2 O 3 O 4 O 5 O 6-10 O 11-15 9. Would you participate in another online education program?	
What was your overall impression of the program and the web seminar format?	
Name of Participant (optional):	

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