

# USDA ARS Affiliates Who Participate on ISU Proposals and Funded Awards

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*Office of the Vice President for Research  
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## **Federal Requirements**

ISU has received guidance from USDA ARS that USDA ARS affiliates cannot serve as the Lead PI on Iowa State University (ISU) proposals or awards. This guidance from USDA ARS is consistent with ISU and federal policy to ensure USDA ARS employees are appropriately representing their affiliation with USDA ARS as federal employees when proposing collaborative activities in conjunction with ISU. Although USDA ARS affiliates cannot serve as the Lead PI on ISU proposals or awards, USDA ARS affiliates can continue to collaborate on ISU proposals or awards as indicated below.

## **USDA ARS Affiliates as Co-PIs on ISU Proposals to NSF**

With authorization from USDA ARS, USDA ARS affiliates can serve as Co-PIs on ISU proposals to the National Science Foundation (NSF) and on ISU proposals to third parties that intend to submit a proposal as the prime on an NSF funding opportunity and intend to subaward to ISU. Should USDA ARS affiliates be interested in serving as Co-PI or as key personnel on an NSF (or NSF pass through) proposal to be submitted by ISU, they are required to submit a letter of collaboration from USDA ARS identifying the USDA ARS affiliates involved in the proposed project to the Office of Sponsored Programs Administration (OSPA) prior to proposal submission. For ISU proposals to NSF (or NSF pass through) involving USDA ARS affiliates, the USDA ARS affiliates will be listed on the proposal as an unfunded Co-PI or key personnel with a USDA ARS affiliation.

## **USDA ARS Affiliates as Subrecipients on ISU Proposals to Non-NSF Entities**

For ISU proposals involving USDA ARS affiliates to be submitted to any sponsor other than NSF (or NSF pass through), USDA ARS requires ISU to budget a subaward or subcontract to USDA ARS for their participation in the project. A USDA ARS letter of collaboration is also required for this type of subrecipient collaboration prior to proposal submission by ISU. USDA ARS affiliates should not be listed as a Co-PI on ISU proposals to USDA ARS.

## **Proposal Development (PD) documents will not include USDA ARS Affiliates**

USDA ARS affiliate participation in NSF proposals will be as a USDA ARS employee, and not as an ISU employee. Effective June 18, 2018, USDA ARS affiliates cannot be listed on the ISU Proposal Development (PD) document and the USDA ARS affiliate will not be considered an ISU PI or ISU Co-PI in recognition of the USDA affiliate's status as a federal employee. In addition, USDA ARS affiliates cannot submit proposals on behalf of ISU.

## **Upon Receipt of an Award**

If an award is granted, USDA ARS affiliates are not authorized to have any supervisory or financial authority over an ISU project or ISU personnel or students. Consequently, USDA ARS affiliates cannot manage any ISU funds and, as a result, cannot be listed or named as a fiduciary authority on any ISU accounts. USDA ARS affiliates are also not eligible to receive ISU incentive.

We appreciate your cooperation regarding this matter. If there are questions regarding the above, please contact the OSPA Director or OSPA Assistant Director at 294-5225.