National Science Foundation (NSF)

NSF Terms and Conditions
Sponsor Specific
Grant General Conditions (GC-1)
Award and Administration Guide

Federal – All awards must follow Uniform Guidance, except as modified by the sponsor-specific terms.
OMB’s Uniform Guidance

NSF Prior Approval Requirements
The requirement to obtain NSF prior approval from the cognizant NSF Grants and Agreements Officer, via Fastlane, applies only to the activities and expenditures specified below, unless otherwise specified in the notice of award.

- Participant support
  - Re-budgeting
  - Adding categories
  - Unused funds

- Rearrangement and Reconversion Costs (see Article 11)

- Rebudgeting
  - Reduction of PI effort by 25% or more
  - Transfer of funds budgeted for Participant support to other categories
  - Adjustment to cost sharing commitments
  - All other rebudgeting when it represents a change in scope

- Salaries of administrative or clerical staff (see 2 CFR § 200.413)

- Significant Project Changes
  - Changes in objectives or scope
  - Addition of a subaward
  - Reduction of PI effort by 25% or more
  - Change of PI
  - Long term disengagement of PI for over 3 months
  - Change to cost sharing commitments reflected on Line M of the NSF grant budget
**NSF Allowability of Select Items**

Clarification of commonly questioned costs. Typically unallowable items may be allowed if prior, *written* approval from the appropriate NSF officer is obtained. All items must be *purchased, received, and utilized* within the period of performance.

- **Consultant Services**
  - A *Professional Services Agreement* must in place as required by *WPI policy*
  - Must be able to justify to NSF that the rate of pay is reasonable

- **Equipment/Property**
  - Individual items over $5K or smaller components of fabricated equipment having an end value of over $5K.
  - Must have useful life of over 1 year.
  - General-purpose equipment is typically not allowed
  - Special purpose equipment
    - Direct charging is allowed when ALL of the following four conditions are met:
      1. Necessary for the research or activity supported by the grant
      2. Not otherwise reasonably available and accessible
      3. Of the type normally charged as a direct cost to sponsored agreements
      4. Acquired in accordance with organizational practice

- **Human Subjects Incentives**
  - Stipends or incentive payments to individuals involved in a clinical trial or research study
  - Must have IRB approval

- **Local Meals and Meetings**
  - Local meals and meetings are typically not allowed

- **Participant Support Costs**
  - Stipends paid to or on behalf of participants or trainees in connection with conferences, REUs, or training projects.
  - Unused participant support cannot be re-budgeted into other categories without written prior approval from the cognizant NSF Program Officer
  - Stipends, subsistence allowances, travel allowances, and registration fees are allowable participant expenses
  - Incentives, gifts, souvenirs, t-shirts and memorabilia are generally unallowable unless specified in the budget
  - Requests to add these items must be submitted via use of NSF’s electronic systems and NSF approval of such changes will be by an amendment to the grant signed by the cognizant NSF Grants and Agreements Officer

Personnel

- Key Personnel - [AAG Chapter II.B.2]
  - Prior approval required to add, remove, or change
  - Prior approval required to reduce effort by 25% or more
  - Prior approval required for disengagement from project for a continuous period of more than 3 months

- Administrative or Clerical Staff - [AAG Chapter V.B.2]
  - Direct charging is allowed when ALL of the following four conditions are met:
    1. Administrative or clerical services are integral to a project or activity
    2. Individuals involved can be specifically identified with the project or activity
    3. Such costs are explicitly included in the approved budget or have the prior written approval of the cognizant NSF Grants Officer
    4. The costs are not also recovered as indirect costs

Subawards - [AAG Chapter II.B.3]

- Prior approval required for all subawards; submit request through Fastlane
- No pre-award costs allowed

Travel

- Conference travel is allowable when required to achieve project objectives or disseminate research results
- Use of US Carriers required per the Fly America Act; exceptions may be made for certain airlines and routes under “Open Skies” agreements listed at [GSA - Fly America Act]
- Travel Costs for Dependents not allowed per WPI policy
- Short-term, travel visa costs (as opposed to longer-term, immigration visas) are allowable when issued for a specific period and purpose and can be clearly identified as directly connected to work performed

Additional Agency Information

- Compliance – See Office of Sponsored Programs for additional information

Cost Share - [GC-1 (article 30)]
- Not allowed, except when required as part of the solicitation

No-Cost Extensions
- Submit programmatic justification to the Office of Sponsored Programs via an [IPAS form]

Pre-Award Costs
- Prime awards only
- Allowed up to 90 days prior to the award start date
- Pre-award costs must be programmatically necessary to the effective and economical conduct of the project and the costs must be otherwise allowable
- Pre-award expenditures are made at the grantee's risk
- In the event a grant is not subsequently made; or the grant is made for a lesser amount than the grantee anticipated, the university will be responsible for any incurred costs

- Program Income
  - When income is recognized by charging for activities directly related to one specific award (such as fees collected for hosting a conference)
  - Must be tracked separately in a non-sponsored fund, see SPA for further guidance.

- PI Reporting – review with Gabe
  - Research Performance Progress Report (RPPR) due annually 90 days prior to award anniversary date
  - Final RPPR is due 90 days after award expiration, and replaces the final annual report
  - Project Outcomes Report for the general public also due 90 days after award expiration
  - All reports must be submitted via Research.gov by the PI

Additional WPI Information, Including Policies and Forms
Sponsored Programs Accounting
Office of Sponsored Programs
Controller's Office