Grants.gov PDF Application Package Retirement
By Mich Pane, Director Pre-Award Operations

On December 31, 2017 the Grants.gov legacy PDF application, also known as the SF424 package, will be retired and no longer available for federal grant applications. Effective January 1, 2018 the Office of Sponsored Research requests Cayuse 424 to be used for federal agency proposal applications submitted via Grants.gov.

Cayuse 424 is a web-based system-to-system solution used at Stanford and many other universities as an alternative to the SF424 application package. Stanford successfully submitted 449 proposals to 19 different federal agencies with Cayuse 424.

The various agencies include the Air Force, Army, DARPA, Dept. of Transportation, EPA, Fish and Wildlife Service, USGS, National Endowment for the Humanities, and most prolifically, the National Institutes of Health.

The look and feel of Cayuse 424 is very similar to the SF424 application package which will make the transition to Cayuse 424 very easy. While Grants.gov has created the new Workspace online environment for application packages, Cayuse 424 offers advantages over Workspace such as:

- Auto-fill of institutional and faculty professional profile information
- Real-time validation engine to ensure the application is error free
  - Sponsor agency specific validations
  - Program opportunity specific validations
  - Grants.gov systems validations
- Secure cloud storage and access for collaborative access to the package
- Version control function of the application package
- Ensure availability and use of the latest application package version
- Real-time submission status update and Grants.gov tracking number
- Responsive system support

OSR has scheduled seminars for administrators and faculty to learn Cayuse 424. If you’re not familiar with Cayuse 424, please attend one of the upcoming seminars at the Clark Center or via Zoom video conferencing.

- August 29, 2017 - 10:00 am to 11:00 am - Clark Center S361
- September 19, 2017 - 3:00 pm to 4:00 pm - Clark Center S360
- October 18, 2017 - 11:00 am to 12:00 pm - Clark Center S361

Starting January 2018, OSR will hold Cayuse 424 Office Hours at various campus locations. Dates, times and locations to be announced. OSR staff will be on site so users can drop by with questions about proposals, or get help with other elements such as setting up a faculty profiles.
FAQ: NSF Participant Support Costs

By Nicole Pobuta, Contract & Grant Officer

The most frequently asked questions received by the NSF Policy Office are related to Participant Support Costs (PSC). OSR receives quite a few PSC questions as well. Uniform Guidance (2 CFR § 200.75) and the NSF Proposal & Award Policies & Procedures Guide define PSC as direct costs “such as subsistence allowances, travel allowances, and registration fees paid to, or on behalf of participants or trainees (but not employees) in connection with NSF-sponsored conferences or training projects”. PSC are excluded from indirect costs and must be itemized and specified in the budget justification.

Here are some Frequently Asked Questions (FAQ) and answers about PSC.

Q: Do human subjects payments or survey completion incentives qualify as PSC?
A: No. They do not qualify as PSC. They should be included as “Other Direct Costs” on line G6 of the NSF budget and incur indirect costs.

Q: Should a student be included under PSC or as paid as an employee?
A: The student’s role should determine how s/he is compensated. If funds will be used to pay students for services rendered, and compensation is tied to number of hours worked, s/he should be paid as an employee. If funds will be used to cover costs of students participating in a project related conference or training activity, the costs should be covered under PSC. PSC cannot support employees. A student cannot be paid as an employee and a participant on the same project.

Q: But if it’s a Research Experiences for Undergraduate research (REU) proposal I can categorize students as both employees and participants, right?
A: No. According to NSF, the goal of the REU program is to provide a practical educational experience for undergraduates to develop research skills while receiving a high-quality interactive mentoring experience. Based on these key objectives, REU students are considered training activity participants and not employees. Funds for REU students support should be in the form of a stipend.

Q: NSF allows rebudgeting. Why do I need approval to rebudget PSC into a different budget category?
A: NSF does provide rebudgeting authority amongst most budget categories, but there are restrictions. Prior NSF approval is required to rebudget any funds out of the PSC category, regardless of the remaining PSC budget amount.

Q: How do I get approval? Can I just send an email to my Program Officer?
A: Approval requests to the NSF Program Officer must be submitted via Research.gov. A corresponding SeRA OSR Request Form with the Request Type of “Sponsor Approval for Rebudgeting” should also be submitted to OSR via SeRA.

Q: Do I need NSF approval to rebudget costs from another direct cost budget category into the PSC budget category?
A: No. Rebudgeting funds into this budget category does not require NSF approval.

Q: May we include conference speaker fees in the PSC budget section? What about room rental fees, catering costs, and supplies that are related to an NSF-sponsored conference?
A: No. The PSC category is only for the support of participants and trainees. PSC do not include honoraria for guest speakers, payments/incentives, rental fees, catering costs, supplies, or expenses for the PI, project staff or collaborators to attend meetings, seminars or conferences.

Have other PSC questions? Contact your OSR Contract & Grant Officer or Accountant.
Gift vs. Sponsored Project - What’s the Difference?

By Brian Del Bono, Senior Contract & Grant Officer

You received a check from a generous funder. Should the support be classified under “gift” or “sponsored project” funds? Sponsored projects are typically externally funded activities with a formal written agreement (grant, contract, or cooperative agreement) with terms and conditions, a detailed statement of work, specific project plan and a budget. These components are included in a proposal submitted by Stanford to the sponsor for competitive review before the agreement is issued.

Sponsored project agreements will specify conditions for detailed financial accountability. Accordance to a line-item budget, securing of prior approvals for specific expenditures, returning of unexpended funds, and submission of financial and audit reports are common conditions in Sponsored project agreements.

A gift is support without the expectation of an exchange of funding for something of significant value, other than proper recognition of the donor’s gift. Gifts can support a general research theme, but not a specific scope of work. Gifts can also be accompanied by an agreement, however the terms can only require general responsible stewardship of the funding, which may include the obligation to provide a simple financial and progress report.

The distinction between a gift and a sponsored project can be difficult to draw. Stanford Research Policy Handbook 13.1 articulates the distinction between gifts and sponsored project designations. In addition, RPH 13.1 provides an Attachment A, job aid for “Determining Whether Funding is a Gift or Sponsored Project”.

Stanford policy applies the applicable facilities and administrative (F&A) rate to all sponsored projects. Gift funds will be assessed an infrastructure charge in accordance with the Infrastructure Charge Policy.

Sponsored projects are handled by the Office of Sponsored Research, Research Management Group, or Industrial Contracts Office. If funds are determined to be a gift, the Office of Development represents Stanford to work with donors. If you have questions about determining if funds are in form of a gift or a sponsored project please contact any of the four offices.

Revisiting Cost Sharing Types for Sponsored Research

By Teresa Catindig, Senior Research Accountant

Cost sharing is the portion of project costs which is not paid by a sponsor. Under the Uniform Guidance (UG), voluntary cost sharing is not expected by Federal sponsors and not factored in the merit review of proposals unless specified in the agency regulations and the funding opportunity or solicitation. It’s important to note not all sponsors incorporate the UG.

There are different types and stages of cost sharing - Mandatory, Voluntary, Committed and Voluntary Uncommitted. There’s also cost sharing for the purpose of covering overdrafts on sponsored research projects.

Mandatory cost sharing is required by the sponsor as a condition of receiving an award so the proposal must be submitted with budgeted cost sharing. On the other hand, Voluntary cost sharing is not sponsor required, but proposed by the University. Once a proposal with Mandatory or Voluntary cost sharing is awarded, the cost sharing becomes Committed cost sharing, requiring the University to fulfill its cost sharing commitment as proposed and awarded.

Voluntary Uncommitted cost sharing is not required by the sponsor, nor mentioned in the proposal and is faculty donated effort or other direct costs essential to a project. Since Voluntary Uncommitted cost sharing is not proposed and constitutes “additional” time or materials it is not considered a binding agreement and is not separately accounted for.

Cost matching is the sponsor requiring the University to match funds in proportion with funds from another party, either from University or typically another sponsor. Matching maybe in actual cash funding of expenditures or “in-kind” match, which is the value of non-cash contributions to the project.

Cost sharing is subject to the same terms and conditions of the sponsor funded award. Allowable expenses on the sponsored award are also allowable as cost shared expenses. Examples of allowable cost share expenses are salary and fringe benefits (some restrictions may apply, please refer to DoResearch 15.3 – Cost Sharing Policy), Stanford contribution tuition, materials and supplies, travel, applicable indirect costs, and other project expenses. Unallowable cost share expenses are defined in federal regulations, costs designated as unallowable for a particular sponsored project, equipment unless exceptions are met, School of Medicine Faculty Salary, NIH salary cap, expenses already included in F&A calculation, and Stipends.

Committed cost share accounts are set-up along with the sponsored account and are monitored the same way. Overdraft cost sharing accounts are setup once an overdraft needs to be cleared. Cost sharing can be funded by gift funds, endowment funds, operating funds, or department designated funds. The PI is responsible for funding cost share accounts and must do so by fiscal year end. PI’s and administrators need to understand the award terms and conditions to ensure cost sharing commitments and any reporting requirements are met. Sponsors often require prior approval for reduction of cost sharing. Frequently Asked Questions on cost sharing can be found on DoResearch. For more information, refer to DoResearch 15.3 – Cost Sharing Policy or contact your OSR Contract & Grant Officer or Research Accountant.
What makes a Strong Subaward Statement of Work?

By Laura Register, Assistant Director, Subaward Oversight & Compliance

Subawards play a large part in Stanford’s sponsored research project goals and deliverables. When reviewing a subrecipient’s proposal before including it into Stanford’s proposal, there are some critical questions you will need to ask. Do you know what the subrecipient will be doing for Stanford? Do you know how the subrecipient’s work fits within Stanford’s work? How will you know if the subrecipient has met milestones and completed work so you can pay them? The answers to these key questions should be in the subrecipient Statement of Work (SOW).

Subaward disputes are often due to a broad SOW lacking detailed and clear information. A good SOW should contain as much specific information as possible and in layman’s terms. Among the important elements are a timeline for specific tasks, reports and other deliverables. The tying of payments to specific deliverables is also ideal. A SOW with specifics makes subaward management - invoice review, processing and payment - much easier.

A broadly written SOW not only makes subaward management more burdensome, it may also put Stanford’s project and funding in jeopardy. If Stanford does not effectively monitor its subrecipients there is a risk the subrecipient may not perform the work as expected and Stanford may not be able to meet its obligations to its sponsor as the pass-through entity. A well composed subaward SOW should include the following specific information:

**Description** - A detailed description of the work to be performed
- Use specific language
  - Don’t leave room for interpretation
  - Use language everyone can understand
- Include a definition of completion
  - If a final product is to be submitted, what constitutes acceptance?
- State specifically what you want the contractor to achieve and deliver
- Include any travel required to complete the work
- Specify if there is a specific number of times something needs to be done (i.e. interview 10 subjects)

**Deliverables** - What you need from the subrecipient to meet your sponsor requirements
- Include a timeline of major deliverable due dates
  - Fixed dates
  - Flexible dates (i.e. Two weeks after some event occurs)
- Include milestones as necessary so that the work can be monitored to ensure that you are getting what you need and the quality of the work is as expected

**Payment terms** - How would you like to pay the subrecipient
- Base payment on monthly or quarterly invoices
- Tie payment to deliverables and milestones
  - Payments can be tied to acceptance of the product or a progress point
  - Hold back a lump sum to be paid at the end of the project
  - Usually contingent on receipt of the deliverable

**Special requirements**
- Is a security clearance required?
- Special skills or knowledge required?
- Additional resources required for the subrecipient to perform?
- Human or animal subjects involved?

For more subawards information check out the subawards page on DoResearch. Subaward questions for Laura? laregist@stanford.edu

The ORA Fair is coming back to The Farm November 14, 2017

The annual Office of Research Administration Fair will be held November 14, 2017 at the Francis C. Arrillaga Alumni Center located at 362 Galvez Street. Last year’s inaugural OSR Fair was a fun and informative event with a great turnout. With the reformation of the Office of Research Administration, we’ve renamed it the ORA Fair.

We’re looking forward to seeing you there so please hold the date on your calendars. Come meet your ORA colleagues and learn about what we do! Staff from all of ORA and colleagues from the Dean of Research, Financial Management Services and Global Business Services will be available at various booths and covering a variety of topics.