

A Message from the Director:



January 2014 will mark my nineteenth year here at UAH in the Office of Sponsored Programs. I have served under five Vice Presidents for Research, and three Associate Vice Presidents for Research. I have learned a lot from all of them and will forever be grateful for their support, guidance and trust. I have experienced the Good, the Bad, and the Ugly. I have, in my opinion, worked very hard to ensure the UAH research community has been kept informed on changes to agencies' guidance, procedures, and federal regulations. I have implemented necessary processes in OSP with the least amount of intrusion, utilizing "best practices" from universities across the country. I brace myself each time the federal government issues a new requirement governing federally sponsored research. The emails will start coming in and I will be reminded that "OSP" is the reason you do not want to do research. Believe me when I tell you, if there is a way we could comply without involving you, I would do it in a "Peloponnesian minute!" (Line from Disney's *Hercules*)

I am reminded that how we see ourselves as an organization is not necessary how we are perceived by the UAH research community. This is a fact. I, for one, know that no organization can be everything to everyone. I also know that we must continue to evaluate our processes to ensure we are providing the

best support we can based on "best practices," with minimum impact to you and your staff. So what does all this mean, you ask? I don't know. OK, just kidding!

What this means to us in OSP is that we must continue to evaluate ourselves and our functions. Some in the research community say we are a hindrance, reactive, stringent and combative. Others say we are supportive, proactive, flexible, and collaborative. I say we are a combination of some all of the time. Some times it is necessary (federal regulations, state laws, and university policies and procedures). Other times it is not necessary (lack the knowledge, an incorrect interpretation of the regulation, agency guidance, and/or university policies and procedures). Either way, it can be very frustrating to you when at times we appear to know what we are doing, and other times we appear to be doing our own thing without regard to you. The latter is not acceptable.

When looking at mission statements of some OSPs, we all have similar mission statements that reads something like: "The purpose of this policy is to protect the interests and reputation of (University) and Principal Investigators (PIs) by ensuring adequate time for a thorough and consistent review of all proposals submitted in a timely fashion. In addition, this guideline assists OSP in executing its duty to ensure compliance with sponsor, federal, state, and university policies." Which is no different than our policy.

I frequently check to see what other comparable research institutions are doing to ensure best practices. I have contacts at several research intensive universities, a research administrator listserv, and organizations such as Council on Government Relations (COGR), Society of Research Administrators (SRA), and National Council of University Research Administrators (NCURA) to name a few. In addition to checking these sources, any changes to existing processes or policies are first discussed with the OVPR, and if approved, I will notify the research community of the change, prior to implementation. I realize that change is not something we like. I hope you understand that when we make a change to a process or introduce a new policy, it is not because we have our own best interest in mind; it's because the funding agency has implemented a new policy or requirement related to sponsored research contracts and grants, and in almost every instance, it will impact how you conduct your research.

I respect what each and every one of you do. I understand that you may think other universities do it better. I do understand your dissatisfaction at times with us and how at times your perception of us is less than favorable. I hope in the new year, we are able to work with you to change your perception of us for the better. I am currently putting together some ideas for the new year, which I will consult with the OVPR. I believe they will improve our working relationship. I respectfully ask that in the meantime, if you believe that we are not being supportive, or in your opinion, one of the unpleasant adjectives I mentioned above, that you please first contact me. The goal is to work towards an agreeable resolution.

Respectfully Yours,
Gloria Greene, MA, CRA
Director, Office of Sponsored Programs



(Continued on page 2)

So, I thought the best way to end 2013 is to try and address some common perceptions with facts, in hope that this will at a minimum have you saying “OK. but.”

Common Perception #1: Why is my administrator/coordinator asking me to provide detail information about my travel, proposing a computer/laptop, and materials and supplies? The agency is not concerned about this stuff. I have been doing this for years. *This type of excessive oversight adds no value to my proposal.*

Fact: Budget Justification: Narrative and Details [Ref.: Appendix B, Part (c)(8)]. Each proposal shall provide a budget justification for each year of the proposed effort and shall be supported by appropriate narrative material and budget details in compliance with the following instructions. All Proposers are required to submit a thoroughly detailed cost breakdown. NASA Procurement Personnel must be able to determine that all proposed costs are allowable and reasonable. A detailed budget will facilitate this cost analysis. Equipment: List all facilities and equipment items separately. General-purpose equipment (i.e., personal computers and/or commercial software) is not allowable as a direct cost unless specifically approved by the NASA Award Officer. <http://www.hq.nasa.gov/office/procurement/nraguidebook/proposer2012.pdf>.

Note: I cannot tell you how many emails I receive from agency Grant Specialists requesting detailed budget information, before an award can be issued. I have similar language from NSF, NIH, and other Grant issuing agencies, but not the room in this edition to add them all .

Common Perception #2: If my Program Director said it was OK for me to purchase that computer, then what more does OSP need. OSP does not respect my technical knowledge. There is no need for OSP to contact the agency when I told them it was approved by my Program Director. *OSP is not a supportive organization.*

Fact: Only contracting officers (see [FAR 1.603-1](#)) are authorized to legally bind the government, enter into contractual commitments, modify or change a contract, authorize certain activities, and obligate or deobligate funds under a contract. Project officers and contracting officer's representatives do **not** have the authority to make contractual commitments or change contract terms and conditions. **Note:** “*Contracts*” are *refers to grants and cooperative agreements*.

Note: I recently attended a conference where Paul Coleman, Senior Special Agent NSF OIG, gave a presentation. He stated that the Program Manager does not have the authority to instruct or approve anything outside of “technical advice.” To do so other wise is a violation of the PM’s authority.

Common Perception #3: OSP hides behind the regulation and uses it as their own personal shield of protection. *This type of behavior will do nothing to strengthen our relationship with them. The agency is not concerned about how I spend my money!*

Fact: OMB Circular A-21, Section C.4.d. Cost principles: The recipient institution is responsible for ensuring that costs charged to a sponsored agreement are allowable, allocable, and reasonable under these cost principles. There is a higher standard for documentation of direct costs; must substantiate the relationship of the cost to the project. In addition, Section E&F: Unallowable Costs are “Costs that are incurred for common or joint objectives, and therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or other institutional activity.”

Note: The fact that a cost requested in a budget is awarded, does not ensure a determination of allowability. The organization is responsible for presenting costs consistently and must not include costs associated with their F&A rate as direct costs. To do so will deem the cost unallowable and result in a finding. I know you all are sick of hearing about Audit findings and compliance with the circulars, however, if the University receives a “Qualified” Audit Report, this can have a negative impact on both sponsored research and financial aid. Especially if the “Qualified” finding is due to a lack of internal controls and processes. Therefore, OSP must always keep in mind that what happens in sponsored research may have a direct impact on Academics (financial aid).

Common Perception #4: *OSP 5 working days policy for proposal submission only benefits OSP, not the PI.*

Fact: The 5 working days prior to agency due date policy benefits both the PI and OSP. The change from 3 to 5 days is due to a successful submission (when we do our job) and the opportunity to resolve any unanticipated technical problems and glitches associated with electronic submission. We also know that sometimes, you will not be able to meet this requirement, for reasons beyond your control; in these instances we will process the proposal.

Note: Prior to implementing any process or procedure, governing sponsored research, I first check to see what other universities are doing. For example, when looking at what other universities are requiring for proposal submission prior to agency due date, I found the following: Virginia Tech (2 working days), North Carolina State (5 working days), Northwestern (5 working days), UT-Knoxville (5 working days all docs, except Technical which is due 2 working days); Mississippi State (3 working days); UCSD (3-5 working days, 5 days if Grants.gov submission), Stanford (5 working days). These are just a few of the universities I refer to when looking at our processes to ensure we are utilizing “Best Practices.”

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Summary of Significant Changes for the NSF Grant Proposal Guide, GPG 14-1, February 2014

A new Grant Proposal Guide, GPG 14-1 will apply to all proposals submitted or due on or after February 24, 2014. Below is a summary of the *significant* changes.

Chapter I.A, NSF Proposal Preparation and Submission: describes at the beginning of the chapter, proposal preparation and submission via FastLane and Grants.gov.

Chapter II.B, Format of the Proposal: add instructions that, upon entering the proposal preparation module in FastLane, the PI will be prompted to select whether or not the proposal is a collaborative proposal and the type of proposal being developed.

Chapter II.C.1.e, Proposal Certifications: includes language states that if research proceeds without the imposition of conditions or restrictions when a conflict of interest exists, this must be disclosed to NSF via use of the Notifications and Requests Module in FastLane.

Chapter II.C.2, Sections of the Proposal: has been augmented to include a list of required sections for a full proposal submitted via FastLane. The section also clarifies that, if the submission instructions do not require a section to be provided, the proposer should insert text or upload a document in that section of the proposal that states, "Not Applicable."

Chapter II.C.2.b, Project Summary: clarifies that a Project Summary containing special characters that is submitted as a PDF file in the Supplementary Documentation section must be formatted with separate headings for the overview, statement on intellectual merit, and statement on broader impacts.

Chapter II.C.2.d(iii), Results from Prior NSF Support: has been amended to make clear that in the summary of results of the completed work, the accomplishments related to Intellectual Merit and Broader Impact activities must be separately described under two distinct headings.

Chapter II.C.2.d(iv), Unfunded Collaborations: has been revised to explain that any substantial collaboration with individuals not included in the budget should be described in the Facilities, Equipment and Other Resources section of the proposal and documented in a letter of commitment from each collaborator.

Chapter II.C.2.f(i), Biographical Sketches: updated to state that inclusion of information beyond that specified may result in the proposal being returned without review.

Chapter II.C.2.f(i)(c), Products: has been supplemented with language stating that, if only publications are included, the heading "Publications" may be used for this section of the Biographical Sketch.

Chapter II.C.2.g(v), Participant Support: has been revised to emphasize that indirect costs are not allowed on participant support costs.

Chapter II.C.2.g(vi)(f), Other, has been updated to include guidance on the allowability of visa costs on an NSF proposal.



Chapter II.C.2.g(xi), Cost Sharing: has been amended to state that, for purposes of budget preparation, the cumulative cost sharing amount must be entered on Line M of the first year's budget. Should an award be made, the organization's cost sharing commitment, as specified on the first year's approved budget, must be met prior to award expiration.

Chapter II.C.2.j, Special Information and Supplementary Documentation: has been revised to move language regarding letters of support to be co-located with information on letters of commitment. The section also was modified to clarify that, in order for NSF to comply with federal environmental statutes the proposer may be requested to submit supplemental post-proposal submission information to NSF in order that a reasonable and accurate assessment of environmental impacts by NSF may be made. NSF intends to pursue the pilot use of a new Institution/Organization Environmental Impacts Checklist in a small number of programs, prior to implementation Foundation-wide.

Chapter II.D.1, Grants for Rapid Response Research (RAPID): has been updated to indicate that the "RAPID" proposal type must be selected in the proposal preparation module in FastLane.

Chapter II.D.2, EARly-concept Grants for Exploratory Research (EAGER): has been updated to indicate that the "EAGER" proposal type must be selected in the proposal preparation module in FastLane.

Chapter II.D.4.b, Submission of a collaborative proposal from multiple organizations: has been supplemented to clarify required sections of the proposal for lead organizations versus non-lead organizations.

Chapter II.D.5, Proposals for Equipment: has been revised to explain what information should be included in different sections of the proposal.

Chapter II.D.8, Proposals for Conferences, Symposia and Workshops: has been augmented to explain that such proposals should include a description of plans to identify resources for child care and other types of family care at the conference site to allow individuals with family care responsibilities to attend.

Chapter II.D.13, Projects Requiring High-Performance Computing Resources, Large Amount of Data Storage, or Advanced Visualization Resources: has been updated to describe NSF-supported resources at University of Illinois, Urbana/Champaign, and National Center for Atmospheric Research, which are in addition to XSEDE.

http://www.nsf.gov/pubs/policydocs/pappguide/nsf14001/gpg_sigchanges.jsp





Office of Management and Budget (OMB)

New Office for Proposal Development designed to increase UAH research capacity.



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The Office for Proposal Development (OPD) was established in October 2013 as an initiative under the UAH Strategic Plan to “broaden and expand the research portfolio.” The primary focus of the OPD is to provide new support options for UAH to increase expenditures from additional sources, and to increase UAH’s lead and/or participation in large, multi-year grants and contracts.

The OPD will help identify new research opportunities and partnerships; coordinate the proposal process for large, long-term and/or multi-institutional opportunities; and facilitate networking strategies to explore new possibilities for research. OPD will also help sponsor research activities to promote the capabilities of UAH while bringing sponsors and investigators together to initiate collaborative efforts. This office can help oversee the capture process, be an advocate for faculty and for UAH, identify strategic opportunities for pursuit, work with faculty and staff to provide proposal guidance and evaluation, and provide help in identifying networking opportunities.

OPD is a new support vehicle to increase UAH research capacity, and has a distinct role and function in the research enterprise. Without duplicating any responsibilities of the Office of Sponsored Programs (OSP), we will be working as a team to provide the best support possible in new research activities. I have already been working with many of you, and I look forward to providing any help that I can to identify and increase our research capacity here at UAH.

The OPD is currently housed on the 3rd floor of Shelbie King Hall. Joining me in this new office are Ms. Janice Temmen, executive assistant, and Ms. Susan Phelan, grant writer.

Regards,
Suzy



The Federal Office of Management and Budget (OMB) has issued circulars that define the principles and standards for sponsored projects funded by federal agencies. OMB circulars A-21, A-110, and A-133 provide instructions for handling federal funds.

WHAT IS OMB A-21?

This section outlines the principles and policies that must be followed regarding the accounting principles, arrangements, and exemptions for any training or work produced under the contract and grant as agreed upon by the Federal Government.

A-21 defines the cost principles applicable to grants and contracts at educational institutions to include:

- Cost Accounting Standards (CAS)
- Direct vs. Indirect (F&A) Costs
- Allowable vs. Unallowable Costs
- Effort Reporting
- Cost Accounting Standards:
 - Consistency in estimating, accumulating, and reporting costs
 - Consistency in allocating costs incurred for the same purpose
 - Accounting for unallowable costs
 - Cost accounting period (fiscal year)
 - Direct Costs are costs must be: Allowable, Allocable Reasonable, Consistent

WHAT IS OMB A-110?

A-110 sets forth procedures for monitoring and reporting financial and program performance and the required reporting forms, including requirements for record retention. Award recipients are responsible for managing and monitoring each project, program, function and activity supported by the award.

WHAT IS OMB A-133?

A-133 sets forth standards for consistency in audits of organizations spending federal awards. A-133 defines the requirements of an audit and explains the responsibilities of the institution, the agency and the auditor. A sample of Federal awards and their direct cost transactions is selected and examined to determine if expenditures and procedures were appropriate A-133 requires an annual external audit of all non-federal entities expending \$500,000 or more annually in Federal funds.





NIH Considers a 'People, Not Projects' Approach to Awarding Grants

The Chronicle of Higher Education, *Paul Basken*

The cash-strapped National Institutes of Health is considering potentially major changes in its grant-awards system, including a greater reliance on a system that evaluates researchers rather than their proposals.

Addressing his advisory committee on Thursday, the agency's director, Francis S. Collins, said that a decade of experience with the NIH Director's Pioneer Award Program has proved that approach's success, and that it's time to consider expanding it throughout the agency.

Dr. Collins said the approach seemed even more necessary now, at a time of deep budget cuts throughout the federal government, to keep financing the "superstars" of science who are now facing the potential loss of grant money.

"You don't want to force them," he said, referring to top university scientists, "into a space of having to define a very precisely narrow project in order to make it through peer review. You want to have a means to encourage them to spread their wings."

For most NIH grant awards, applicants propose projects designed to answer specific questions, and a proposal's value is judged and compared by a peer-review panel of subject experts. For the Pioneer Award, begun in 2004, applicants suggest broad approaches to a research question, and the review emphasizes the person's potential to succeed. Pioneer Awards provide up to \$500,000 a year for five years. The standard NIH grant is worth closer to \$200,000 over three to five years.

But the NIH, with an annual budget of about \$30-billion a year, makes only seven Pioneer Award grants a year. At a meeting next month with directors of the NIH's 27 institutes, Dr. Collins said he planned to push for more. He did not specify, however, what percentage of NIH grants might use the new model.

Hughes Institute as Model

Dr. Collins repeatedly cited the Howard Hughes Medical Institute, the nation's largest private provider of health-research money, as an example of the model he wants. The Hughes institute gives grants to highly rated researchers without requiring that specific projects be identified in advance.

The NIH commissioned a private study of Pioneer Award recipients by the Institute for Defense Analyses, which reported last year that their level of innovation and impact was similar to that of Hughes awardees, and greater than that of investigators with standard NIH grants.

Advocates of the NIH's making greater use of the Hughes institute's approach include John P.A. Ioannidis, a professor of medicine and health research and policy at Stanford University, who has said it would save both the NIH and university researchers large amounts of the time and money that go into the peer-review process.

But great caution is necessary, said Pierre Azoulay, an associate professor of management at the Massachusetts Institute of Technology, who contends the "people, not projects" aspect isn't the chief reason for the success of the Hughes institute's approach.

Other factors are more important, Mr. Azoulay said, include the long time horizon of a Hughes award, which typically consists of an initial grant and a renewal lasting a total of 10 years.

He also challenged the NIH over its assessment of the Pioneer Award, saying the program, like many well-meaning innovations at the NIH, was not designed from the start to allow for easy assessment of its usefulness. As an example, he said, Pioneer Award applications are not scored individually in a way that permits an outside evaluation of the process.

Also, Mr. Azoulay said, a private foundation like the Hughes institute doesn't have to publicly defend its grant decisions. If the NIH puts a greater emphasis on selecting people rather than their projects, allegations of racial or gender biases could be far more difficult to defend, he said.

'The Worst Year'

The suggested change could also worsen the problem—repeatedly bemoaned by NIH leaders, especially during tight budgetary times—of the rise in the average age at which researchers win their first NIH grant, said Jeremy M. Berg, an associate senior vice chancellor for science strategy and planning at the University of Pittsburgh who was formerly head of an NIH division.

Dr. Collins and members of his advisory committee, a panel of outside experts mostly from universities, reiterated that concern on Thursday. One panel member, Shirley M. Tilghman, a molecular biologist who is a former president of Princeton University, said one way to clear NIH resources for younger researchers would be a grant that would pay senior researchers to wind down their labs and distribute their resources to others in return for a commitment to seek no more NIH money.

She referred to it as a "terminal grant," though conceded a different term would likely be necessary to make it more palatable.

The Howard Hughes Medical Institute has a similar program, in which it phases out grantees over a five-year period. The program is too new for a deep analysis, though it appears well received by scientists, said Robert T. Tjian, president of Hughes. It's "a graceful and productive way for scientists to plan their future involvement in research and teaching as they approach the end of a natural cycle in a scientific life," said Mr. Tjian, a professor of biochemistry and molecular biology at the University of California at Berkeley.

Panel members also pressed Dr. Collins over the NIH's policy restricting the resubmission of failed grant applications. Allowing just a single revision, they said, works against small laboratories that can't easily compile a new set of data for an entirely new application. But Dr. Collins held firm, saying the policy was



NIH Considers a 'People, Not Projects' Approach to Awarding Grants *continues*

intended to make the NIH grant process more efficient by weeding out repetitive reviews. Over all, Dr. Collins said, the experience of the federal budget shutdown in October had raised the profile of the NIH, with lawmakers in both parties identifying it as one of the more valuable parts of the government.

But that may not be enough to spare it from continued budget damage, Dr. Collins said, given that Congress faces another shutdown deadline this month. And after the agency's \$1.5-billion budget cut last March, making for "the worst year in recorded history" in terms of the NIH's ability to support grants, there's little indication of any major financial revival even if another shutdown is avoided, he said.

OVPR 2013-2014 Cross-College Faculty Research Award Recipients

The Office of the Vice President for Research (OVPR) funded 21 proposals for the first Cross-College Faculty Research Award. This program is intended to facilitate interdisciplinary interaction between faculty from more than one college around a common research theme.

PI/Title	CO-I	PI/Title	CO-I	PI/Title	CO-I
Dr. Susan Alexander-CON Title: <i>Creation of a Multi-disciplinary Team for the Solicitation of Funding through Health Information Technology Proposals</i>	Dr. Hoy, CON Ms. Allbritton, CLA Dr. Ramachandran, ITSC Mr. Maskey, ITSC Dr. Nair, ATS	Dr. James Baird, CH Title: <i>Determination of the Induction Time for Crystals of the Pth1 Enzyme/Inhibitor Complex Using a Micro-Dilatometer</i>	Dr. Williams, ECE	Dr. Elizabeth Barnby, CON Title: <i>SNCRT: Prevention of Neurological Decline Utilizing Pharmacological Treatment of Tyrosinemia Type I (TTI) in a mouse model</i>	Dr. MacGregor, BYS Dr. Hoy, CON
Dr. Lingze Duan, PHY Title: <i>Fundamental Thermo-mechanical Noise in Fiber Optic Strain Sensors</i>	Dr. Zuo, MAE	Dr. Robert Griffin, ATS Title: <i>Interdisciplinary Research into Water Resources Affected by Climate Change in Latin America: Vulnerability, Resilience, and Adaptation</i>	Dr. Knight, SOC. Dr. Stoutenborough, POL SCI	Dr. Junpeng Guo, ECE Title: <i>Ultraviolet Plasmonic Nanophotonics for Spectroscopy and Sensing</i>	Dr. Scholz, CH
Dr. Jatinder Gupta, CBA Title: <i>Computational Optimization Models for Investigating Crime in Digital Forensics</i>	Dr. Yoo, ECE	Dr. Kathleen Hawk, CLA Title: <i>Intelligence Community Center for Academic Excellence Development</i>	Dr. Graves, ITSC Dr. Frendi, MAE Dr. Colley, CMSA Dr. Griffin, ATS	Dr. Brian Landrum, MAE Title: <i>Collaborative Approach to Increasing Transportation Safety Through Mitigation of Deer-Vehicle Collisions</i>	Dr. Griffin, ATS
Dr. Kathy Newman, CON Title: <i>SNCORT: Use of Web Based Scales to Prevent Adolescent Obesity</i>	Dr. MacGregor, BYS Dr. Barnby, CON	Dr. Pam O'Neal, CON Title: <i>Collaborative to Advance Healthcare through Policy, Practice, and Leading Edge Technology Development in the U.S. and Abroad</i>	Dr. Adams, CON Dr. Landrum, MAE Dr. Wilhite, ECON	Dr. Wafa Orman, ECON Title: <i>Collaborative Research Team Investigating Violence Against Women</i>	Dr. Primeau, CON Dr. Bianchi, CON
Dr. Marlena Primeau, CON Title: <i>Enhancing Simulation Learning Outcomes through Increased Authenticity</i>	Dr. Harwell, Communications Arts Dr. Lioce, CON	Dr. Carmen Scholz, CH Title: <i>High-Throughput Production of Proteins via Affinity Chromatography</i>	Dr. Cerro, CME	Dr. Fan Tseng, MGT/MKT Title: <i>Nurse Staffing Decisions on Patents Outcomes Using Advanced Business Analytics</i>	Dr. Frith, CON
Dr. Emanuel Waddell, CH Title: <i>Nanohole Enhanced Surface Enhanced Raman Spectroscopy</i>	Dr. Guo, ECE	Dr. Ryan Weber, English Title: <i>Does a Classroom Facebook Page Improve Student Acceptance and Knowledge of Evolutionary Theory?</i>	Dr. Stallsmith, BYS Dr. Matzkin, BYS	Dr. Jeffrey Weimer, CH Title: <i>Does the Extend of Order in Layers of Quantum Dots Affect Their Opto-Electrical Properties</i>	Dr. Sadeghi, PHY Dr. Cerro, CME Dr. Guo, ECE Dr. Williams, ECE
Ms. Andrea Word-Allbritton, English Title: <i>General Education, Threshold Concepts, and Postsecondary Pedagogy</i>	Dr. O'Brien, Education Dr. Price, PSY Dr. Griffin, ATS Dr. Waring, HSY Dr. Gupta, CBA Dr. Hoy, CON	Dr. Kunning Xu, MAE Title: <i>The Physiological Effects of Atmospheric Non Thermal Plasma</i>	Dr. MacGregor, BYS	Dr. Seong-Moo Yoo, ECE Title: <i>Resiliency-Based Cyber Security Econometrics</i>	Dr. Gupta, COB

Upcoming Limited Submission Solicitations

Sponsor Name	Program Name	Agency Limitation/Due Date
National Science Foundation (NSF)	NSF Scholarships in Science, Technology, Engineering, and Mathematics (S-STEMS)	This program makes grants to institutions of higher education to support scholarships for academically talented students demonstrating financial need, enabling them to enter the STEM workforce or STEM graduate school following completion of an associate, baccalaureate, or graduate-level degree in science, technology, engineering or mathematics disciplines. Grantee institutions are responsible for selecting scholarship recipients, reporting demographic information about student scholars, and managing the S-STEM project at the institution. Only 1 Submission per institution. Agency Deadline: 8/12/2014

Upcoming Workshops

Title	Presenter	Date/Time Location	Description
"Working with NSF to Increase Funding Success – a Brown Bag Discussion"	Dr. Paul Collopy Prof & Chair ISEEM	Friday, 1/24/2014 VBRH, M-50 12 noon – 1 p.m.	Dr. Collopy, former Program Director for NSF Engineering Systems Design and Systems Science Programs, will share his experiences at NSF, discuss common pitfalls in the proposal development process, and answer your questions. Lunch will be provided.
Breaking the Barriers to Writing Proposals	Dr. Robert Lucas Institute for Scholarly Productivity	Friday, 2/28/2014 Location: TBA 8:30 a.m. – 3:30 p.m.	Dr. Robert Lucas from the Institute for Scholarly Productivity in San Luis Obispo, Calif., returns to UAH for this one-day workshop designed for new faculty and research staff. Topics include typical components of a proposal, writing for private foundations, and strategies for writing. Lunch will be provided.
The Art of Grantsmanship	Dr. Nancy Bell, Research Image	March 13-14, 2014 Location: TBA 8:30-4:30 p.m.	Workshop will provide a hands-on opportunity for PIs currently writing a new or resubmitting a propose. Lunch will be provided.





Allowable, Allocable, or Questionable?

Investigators often don't understand why that one thing they want to buy is not an allowable and/or allocable cost. It's also pretty rare that they want to hear our recitation of OMB A-21, section J-10. Instead of explaining the detailed Federal Regulations, let me provide the broad rules for Allocable and Allowable Costs.

A. Allocable Costs

A cost is allocable to a particular cost objective (i.e., a specific function, project, sponsored agreement, department, or the like) if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationship. Every incurred cost must have a direct benefit to the sponsored project being charged.

In general, a cost is allocable to a particular sponsored project if it fulfills one of the following conditions:

1. it is incurred solely to advance the work under the sponsored agreement; or
2. it benefits both the sponsored agreement and other work of the institution, in proportions that can be approximated through use of reasonable methods; or
3. it is necessary to the overall operation of the institution and, in light of the principles provided in 2 CFR Part 220 (OMB Circular A21) is deemed to be assignable in part to sponsored projects.

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then the costs may be allocated or transferred to benefited projects on any reasonable basis.

In the rare instances in which a proper cost allocation cannot ultimately be determined using any reasonable methods, the cost may be charged to a single sponsored project. Where the purchase of equipment or other capital items is specifically authorized under a sponsored agreement, the amounts thus authorized for such purchases are assignable to the sponsored agreement regardless of the use that may subsequently be made of the equipment or other capital items involved.

Any costs allocable to a particular sponsored agreement under the standards provided in 2 CFR Part 220 may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience. Any costs allocable to activities sponsored by industry, foreign governments, or other sponsors may not be shifted to federally sponsored agreements.

B. Allowable Costs

All costs must be allowable under federal regulations and sponsor terms and conditions, including program-specific requirements and University policy. To be allowable, costs must:

1. be reasonable and necessary;
2. be allocable sponsored projects under the principles and methods provided in 2 CFR Part 220;
3. be given consistent treatment; and
4. conform to any limits or exclusions set forth 2 CFR Part 220 or the terms and conditions of the award.

2 CFR Part 220 details the allowability of particular elements of cost. When an item is questionable, Contracts and Grants Accounting should be consulted before the cost is incurred. Typical costs charged directly to a sponsored project include:

1. compensation of employees for performance of work under the sponsored agreement, including related fringe benefit costs;
2. costs of materials consumed or expended in the performance of the sponsored project;
3. travel in accordance with the University's policy;
4. other allowable items of expense incurred for the sponsored project.

Costs of materials from stock/services rendered by specialized facilities or other institutional service operations may be included as costs under federally sponsored agreements, provided such items are:

1. consistently treated in similar circumstances as direct costs, rather than F&A (indirect) costs; and
2. charged under a recognized method of computing actual costs.

The chart on the next page provides several example from FederalFraud.com and the National Conference of College Cost Accounting (NACCA) Recent Summary of Audits, Settlements and Investigations Related to Federal Programs (2013).



We are updating the OSP Website <http://www.uah.edu/osp> to provide accesses to more resources and make it more user friendly and informative. We have created a link called "Researchers Resources." Here is where you can find many of the answers you may have related to UAH Pre and Post Award processes and forms. In addition we have links to several sponsors websites. Under the link "**Outlines and Templates**," you will find links and templates to assist you with developing documents such as the NSF Post Doctoral Mentoring Plan, NSF Data Management Plan, NSF Prior Support document, and the NIH plan for instruction in the "Responsible Conduct of Research" required for NIH F, K and T grant applications. If there are other templates and/or links you would like see added to "Researcher's Resources," please contact Gloria Greene at greeneg@uah.edu, or X2657.

University Audits, Settlements, and Investigations Related to Federal Programs

To learn more about each case go to: http://www.costaccounting.org/files/pdfs/09_2013_audit_summary.pdf

Issue Date	University	Funding Agency	Audit Agency	Audit Finding
07/30/13	Northwestern University	NIH	HHS OIG, FBI, NIH, U.S. Attorney's Office	Northwestern University to Pay Nearly \$3 Million Settlement related to False Claims. (Dr. Bennett). Finding: Federal grants billed for family trips, meals, hotels and consulting fees benefitting Dr. Bennett, his friends and family.
06/09/13	Morgan State University	NSF	NSF	Morgan professor accused of grant money kickback scheme. (Dr. Manoj Kumar Jha) Finding: Federal prosecutors allege in a court filing Manoj Kumar Jha, director of the university's Center for Advanced Transportation and Infrastructure Engineering Research, handed stipend checks to students at the university but demanded they pay part of the money back to him, in an effort to cover up his alleged misuse of the grant money.
06/07/13	University of Colorado Denver	HHS, (NIH)	NIH OIG	1. Hourly Salary Costs – Lack of Sufficient Support: The hourly employee's timesheets documenting the salary costs did not identify the projects or activities on which the employees worked. 2. Indirect Costs Charged as Direct: University charged as direct costs general-use supplies that should have been treated as F&A costs. These administrative expenses charged directly to HHS-funded grants, contracts, and other agreements included monthly local telephone line charges, memberships, a computer monitor, and general office supplies. 3. Lack of Documentation – One Transaction: University charged lab supplies to an award but could not provide a receipt or any other documentation supporting the charge. 4. Unallowable Costs: University charged an award for services as direct costs rather than as indirect (F&A) costs. Moreover, these billed services were actually for work that was performed on another project and therefore did not meet the criteria for allocability.
06/04/13	Thomas Jefferson University	HHS, (NIH)	NIH OIG	1. Salary Costs-Documents: One transaction lacked documentation to corroborate the amount of effort charged to the award. 2. Office supplies and general use equipment that should have been charged as F&A. (a) General use laptop and accessories and (b) Binder clips, superglue, post it notes and pens. 3. Individual membership in a professional organization: Only costs for institution's memberships are allowable. Individual membership should not have been charged to the award.
09/28/12	University of California, Santa Barbara	NSF	NSF OIG	1: Overcharged Faculty Summer Salaries over \$1.9M: Charging more than 3/9 of base salary. 2: Over \$2.8 Million of Excess Federal Cash Disbursements Resulted From Not Fulfilling Grant Cost Share Requirements 3: Approximately \$500,000 of Inappropriate Cost Transfers into NSF Awards 4: Over \$473,000 of Indirect Cost Overcharges to NSF Grants 5: \$440,000 of Unallowable Costs Charged to NSF Grants 6: UCSB Used \$180,000 of Remaining Fellowship Funds for Non-Award Purposes

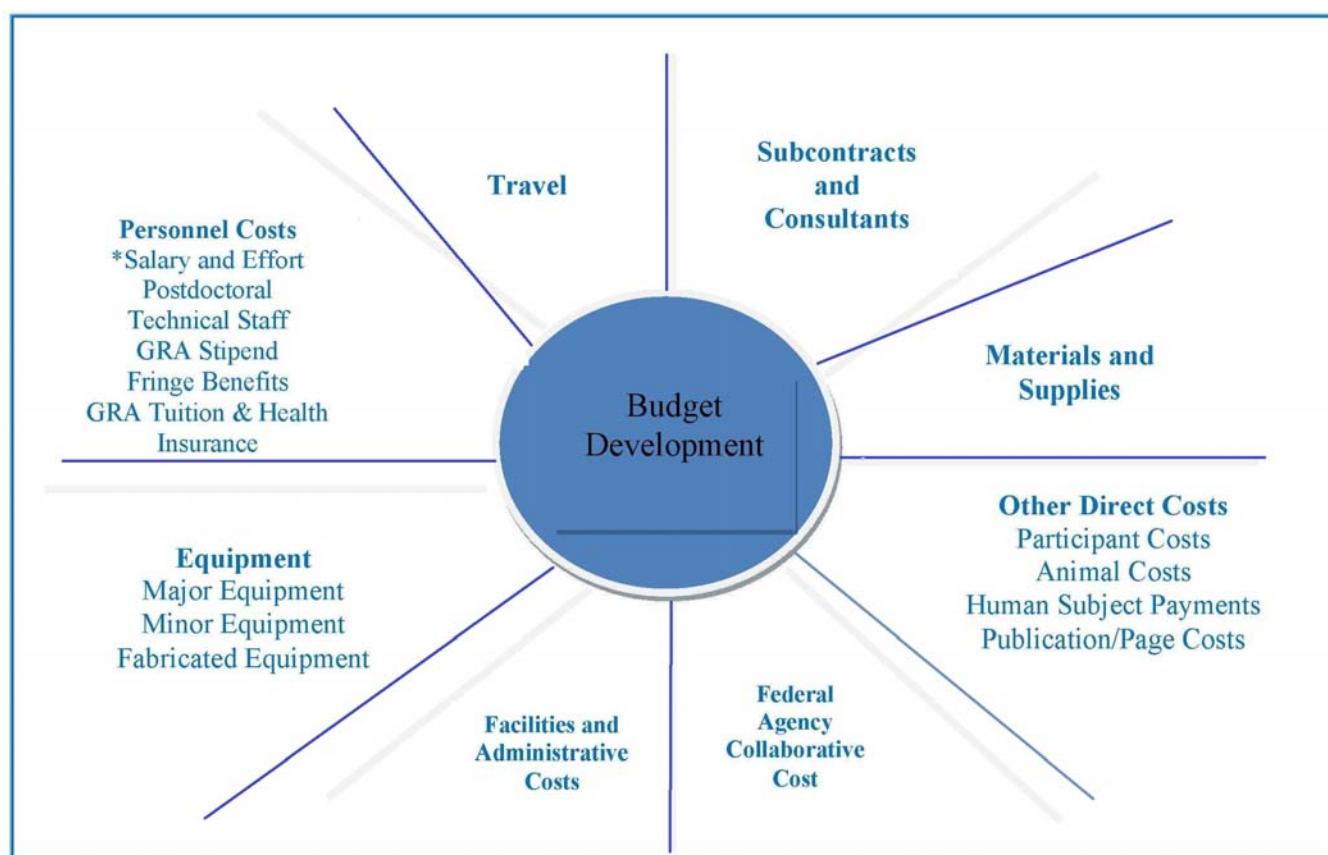


Budget Development Guide

Definition of “Budget”: a detailed statement outlining estimated project costs to support the sponsored project. A budget should include all the Direct Costs and Facilities and Administrative (F&A) (or overhead) costs required to carry out the project objectives. Specific requirements, including cost principles as defined by the federal government in the *Office of Management & Budget (OMB) Circular A-21*, must be adhered to at the **proposal** stage and when the funds are expended.

Direct Costs: Expenses that are specifically associated with a particular sponsored project or activity and/or can be directly assigned to that project or activity with a high degree of accuracy for example graduate student stipend and tuition.

F&A Costs: Institute expenses that cannot be specifically identified with a particular project or activity.



Note: *OMB A-21* indicates that the salaries of administrative and clerical staff should normally be treated as F&A, if the administrative expense **does not** meet the criteria for direct charging as follows:

- Direct charging of these costs may be appropriate where a **major project or activity** explicitly budgets for administrative or clerical services and individuals involved can be specifically identified with the project or activity
- “**Major project**” is defined as a project that requires an extensive amount of administrative or clerical support, which is significantly greater than the routine level of such services provided by academic departments
- Four criteria must be met for direct charging administrative expenses to a sponsored project:
 - Incurred for the performance of a major project or activity
 - Specifically identified and directly benefiting the project
 - Budgeted and approved by the sponsor
 - Supported by a budget justification

Roles and Responsibilities

Pre- Award

Principal Investigator	Office of Sponsored Programs
<p>Responsible for the overall development and content of the proposal; may delegate aspects of preparation to administrative and scientific staff, but remains ultimately responsible for all aspects of the proposal as submitted.</p> <ul style="list-style-type: none"> Reviews <u>sponsor</u> requirements—both standard and non- standard. Develops the <u>scope of work</u> and determines the resources necessary to complete the project. Provides data for the <u>budget</u> and justification in collaboration with administrator or Contracts and Grants Coordinator, including confirming allowable budgeted items and verifying time/effort commitments, salaries, salary caps, and rates (F&A), tuition, <u>cost sharing</u>, and signed PI certification form. Communicates with administrator or Contracts and Grants Coordinator as early as possible during budget preparation regarding preparation of Small Business Subcontracting Plan, if required. Consults with the Center Director/Dean/Department Chair regarding the use of space, cost sharing, and other key issues, as needed. Secures all Institute commitments required for proposal. This includes Human and Animal subject protocol(s); Responsible Conduct of Research Training; Export Control; radioactivity; biohazards; Fabricated <u>Equipment</u> approval; Commitment Letters and Proposals from Subcontractors, Collaborators, and Consultants; and equipment and materials and supplies quotes and justifications. Completes all required disclosures, to include but not limited to <u>Conflict of Interest</u>, Financial Disclosure, etc., if required; ensures all other Sr/Key Persons do the same. Upload all applicable documents in accordance with agency PI requirements. 	<ul style="list-style-type: none"> Reviews sponsor requirements. Ensures all personnel proposed have the required RCR Training and Export Control Certification. Prepares budget based on information provided by Principal Investigator. Reviews proposal, budgets, and supporting documentation for compliance with sponsor solicitation, federal and UAH policies. Notifies the PI and support staff of any changes required to make the application compliant Works with the PI and support staff in preparing the Small Business Subcontracting Plan, if required. Prepares and executes Non-disclosure Agreements (NDAs), Memorandum of Understanding (MOUs), Teaming and Collaboration Agreements (consulting with Office of Counsel and OVPR), if necessary. Drafts the response to anticipated sponsor terms or drafts the proposed agreement, as appropriate. Ensures proper institutional sign-offs on proposals and financial commitments, such as F&A reduction/cost and institution cost sharing. Prepares supporting documents for proposal, including the transmittal letter, certifications, and response to terms and conditions, if necessary. Releases electronic proposals for review approval. Submits proposal to sponsoring agency. Notifies PI when proposal is submitted. Verifies receipt of proposal via funding agency website, if applicable. Logs and enters proposal data in OSP ERA database.



UAH NCURA Peer Review

On October 28-30, 2013, UAH completed a three-day Peer Review Process. The NCURA Peer Review Process is a powerful tool which enhances the university's sponsored programs operations. The review was conducted by a team of nationally recognized research administrators: Robert Andresen (Team Leader), Director of Research Financial Services and Associate Director of Research and Sponsored Programs, University of Wisconsin; David Mayo, Director of Sponsored Programs, California Institute of Technology; Denise Wallen, Associate Director, University of New Mexico; and Peggy Lowry, Manager, NCURA Peer Review Program. The reviewers who thoroughly evaluated the sponsored programs area.

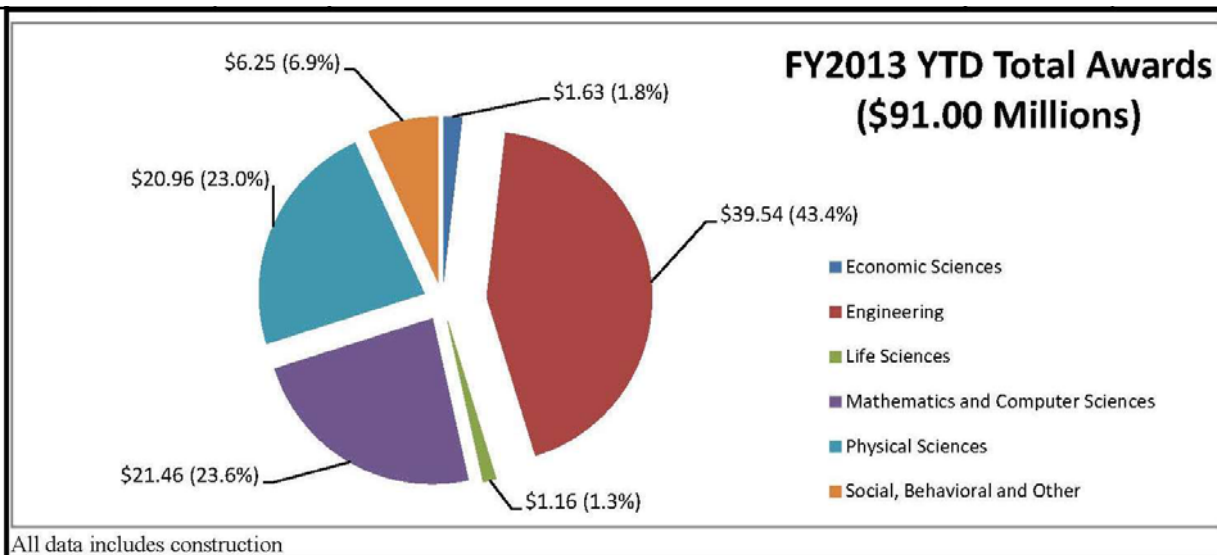
The review utilizes National Standards that represent the core and vital functions of sponsored programs-regardless of size and type of institution. We will be receiving a report that provides valuable feedback addressing program strengths and areas for improvement. This feedback will assist us in providing quality support, minimizing risk, and promoting a positive culture for re-

search administration, both pre and post award.

I would like to personally thank Ray Vaughn and Ray Pinner for recognizing the benefit of the review and everyone that took the time to meet with the Committee to provide input that will assist us with our efforts to provide the best pre- and post-award support possible. Final Report is due to UAH on January 27, 2014. We will share the report with the Research Community.

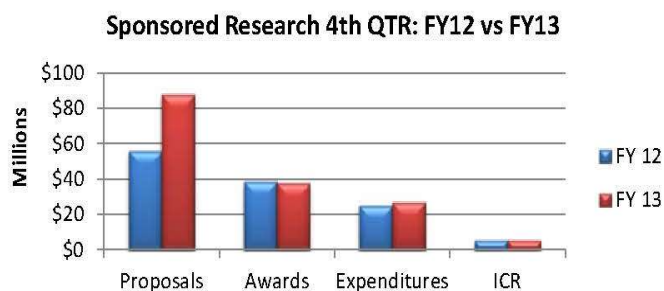


Sponsored Programs Fiscal Year 2013



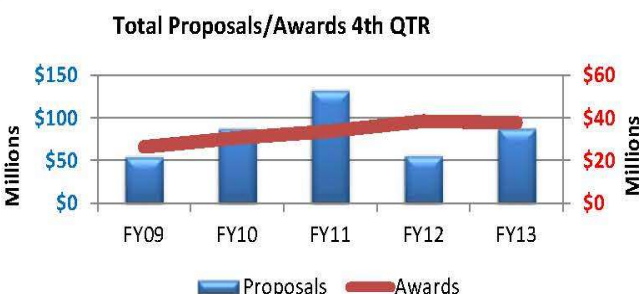
Sponsored Research 4th Qtr. FY12/FY13		
	FY 12	FY 13
Proposals	\$55,882,480	\$87,803,302
Awards	\$38,521,087	\$37,697,885
Expenditures	\$25,025,272	\$26,776,080
ICR	\$5,295,191	\$5,228,852
Effective ICR*	27%	24%

* Effective ICR Rate = (ICR/(Expenditures-ICR))



Sponsored Programs Fourth Quarter FY2013 (July-September 2013) ONLY

Total Proposals/Awards 4th Qtr		
Fiscal Year	Proposals	Awards
FY09	\$54,303,835	\$26,490,180
FY10	\$87,532,394	\$30,730,117
FY11	\$132,580,270	\$33,921,313
FY12	\$55,882,480	\$38,521,087
FY13	\$87,803,302	\$37,697,885



Being in a band is always a compromise. Provided that the balance is good, what you lose in compromise, you gain by collaboration. —Mike Rutherford



SPONSORED PROGRAMS YEAR TO DATE FY13



RESEARCH QUARTERLY DASHBOARD

College/Center	Proposals Submitted FY13 YTD			Awards Received FY13 YTD			Expenditures FY13 YTD	
	No.	Amount Requested	% Change vs. FY12(\$)	No.	Amount Received	% Change vs. FY12(\$)	Amount Expended	% Change vs. FY12(\$)
College of Business**	16	\$907,145	-60.8%	13	\$629,886	20.1%	\$573,447	-78.4%
College of Engineering	119	\$22,519,564	-48.4%	67	\$7,022,271	103.9%	\$3,334,816	19.2%
College of Science	80	\$18,870,340	126.1%	50	\$1,892,779	-9.5%	\$1,925,668	-0.9%
College of Liberal Arts***	17	\$1,392,879	-39.8%	5	\$139,244	-93.0%	\$374,366	379.0%
College of Nursing	11	\$801,414	-54.2%	3	\$708,641	23521.4%	\$354,095	1311.3%
CAO	35	\$5,087,029	-32.4%	28	\$1,089,278	4.9%	\$1,145,057	-15.5%
CMER	4	\$396,986	-56.3%	9	\$970,798	15.2%	\$1,039,404	-13.3%
CMSA	17	\$8,953,914	-18.9%	14	\$1,121,527	-11.7%	\$1,185,795	-21.0%
CSPAR	120	\$29,787,658	8.0%	89	\$5,663,712	-20.7%	\$5,966,051	8.1%
CSS	0	\$0	0.0%	0	\$0	0.0%	\$0	-100.0%
ESSC	94	\$32,006,840	32.6%	64	\$10,354,685	46.7%	\$9,452,766	-2.0%
ITSC	14	\$7,799,988	25.7%	47	\$3,710,068	-35.3%	\$6,795,910	23.9%
LSB	0	\$0	0.0%	0	\$0	0.0%	\$83,826	0.0%
Provost****	8	\$6,290,017	59.5%	15	\$6,129,651	372.5%	\$3,949,725	-4.8%
PRC	36	\$8,351,710	18.5%	17	\$1,795,159	0.2%	\$2,395,536	23.9%
Research Institute	77	\$5,821,849	-69.7%	125	\$5,192,959	-58.8%	\$12,327,699	81.0%
RSESC	27	\$4,806,066	30.4%	53	\$3,789,109	13.7%	\$3,438,349	-11.3%
SMAP Center	211	\$42,149,916	5.3%	505	\$37,960,678	-4.1%	\$40,093,751	8.1%
VP F&A	0	\$0	0.0%	3	\$28,050	-98.0%	\$2,858,669	70.3%
VPR	6	\$29,890,426	0.0%	138	\$2,798,979	60.4%	\$72,252	10.3%
Total	892	\$225,833,740	4.2%	1245	\$90,997,474	0.7%	\$97,367,182	9.8%
* CBA includes: CMOST& SBDC			** LA includes Humanities Center			*** Provost includes: PCS, ISED, Library, OIP, & AA		

A successful society is characterized by a rising living standard for its population, increasing investment in factories and basic infrastructure, and the generation of additional surplus, which is invested in generating new discoveries in science and technology.—Robert “Bob” Trout



OFFICE OF TECHNOLOGY & COMMERCIALIZATION

Kannan Grant, Director
VBRH—E39 (256) 824-6621

Georgia Tech Case a Cautionary Tale of How Faculty Start-ups Can go Very, Very Wrong

By David Schwartz, Published: November 20, 2013

Two years ago, a prominent Georgia Tech professor and inventor was arrested on racketeering charges and fired by the university; today, with the case still in the courts, it stands as a hard example of the conflict-of-interest gray areas that can bring promising start-ups – and even researchers themselves – into a freefall of ill will and bad press.

Dr. Joy Laskar, a professor of electrical engineering and popular student mentor at the time, was on the verge of selling his latest university spinout, Sayana, based on a promising wireless chip for storing data, when on May 17th, 2010 agents from the Georgia Bureau of Investigation raided his university offices and his home. “It was devastating, absolutely devastating,” Laskar says. “What were they looking for? Cash under the bed? Chips in the ceiling?”

According to Georgia Tech, Laskar had misled the university about the extent of his involvement in Sayana, describing himself as advisor in some faculty conflict-of-interest forms, and as a founder in others. Laskar argues that if anything he was simply disorganized, and that his involvement in Sayana was not a secret in any way.

Georgia Tech also accused Sayana employees of using university lab space, equipment and other resources without permission. The most serious charges, however, involved misuse of funds. University auditors alleged that Laskar had misappropriated as much as \$1.5 million to benefit Sayana.

Unable to prove that charge definitively, Georgia Tech claimed at minimum it had paid for \$50,000 worth of chips in 2007 that were sent to a chip research institute in Korea to satisfy a contractual obligation Sayana had with the Korean institute. Laskar countered that these chips originally served academic purposes, and that the Korean institute was merely verifying that the chips worked and would later return them to Georgia Tech. He claimed that Sayana’s licensing deal with the university in fact allowed it.

On May 7th, 2011, Georgia Tech officially let Laskar go. “These violations are sufficiently egregious to warrant dismissal,” a faculty committee report said. While it acknowledged that Laskar’s surrounding entrepreneurial environment may have encouraged his actions, it claimed that as a leader in innovation he had “a particular responsibility to set an example and to insure that such violations did not occur.”

Mike Farmwald, a Silicon Valley entrepreneur who co-founded one of Laskar’s companies, agrees that Laskar pushed the limits of what’s considered ethical by university standards, but he is

surprised that Georgia Tech did not handle the situation with a discussion about its policies or another internal mechanism versus a public arrest. “Clearly, someone at GT was pretty unhappy with Joy and wanted to make an example out of him,” Farmwald says. “Some of the charges seem pretty stretched.”

Laskar is currently fighting the university in court. In 2011, the Board of Regents agreed to pay him \$258,000 in back pay, benefits and legal fees after he accused Georgia Tech of violating its own policies when it suspended him without pay. He sold the assets of Sayana to a new company, Centric Technologies, which is now suing the Georgia Tech Research Corporation, the university’s tech transfer arm, for \$30 million to \$40 million in damages for holding back its chip prototypes, preventing the company from moving forward in development. The Georgia Tech Research Corporation has denied these charges.

One Georgia Tech faculty member, who asked not to be named for fear of getting on the bad side of the administration, claims that Laskar’s firing and arrest had a “horribly chilling effect” on faculty start-ups. But Stephen R. Fleming, vice president in charge of the school’s Enterprise Innovation Institute, disputed that account, noting that the number of start-ups created annually has been relatively steady since 2005. “We haven’t seen a drop-off for any reason,” Fleming says.

Laskar has been unable to find a full-time position in academia since his publicized Georgia Tech dismissal, and has moved to Silicon Valley where he works for an investment and advisory firm.

<http://www.nytimes.com/2013/11/17/technology/reaching-for-silicon-valley.html?pagewanted=1&r=3&src=me>



OFFICE OF RESEARCH SECURITY

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Department of Defense—Defense Security Services Industrial Security Letter 2013-05, July 2, 2013

Applicability of National Industrial Security Program Operating Manual (NISPOM) Paragraph 1-301 Reporting Requirements to Cyber Intrusions ISL 2010-02 is hereby cancelled and superseded by this ISL, which clarifies the application of NISPOM paragraph 1-301 reporting requirements to cyber intrusions occurring on contractor information systems. The NISPOM is focused on the protection of classified information, and specifically covers classified information systems owned or operated by cleared industry. The NISPOM does not govern the protection of unclassified information, nor does it provide security or reporting requirements that are directed to a contractor's unclassified information systems.

It is in this context that paragraph 1-301 of the NISPOM requires contractors¹ to promptly report to the Federal Bureau of Investigation (FBI) (with a copy to DSS) information coming to the contractor's attention concerning "actual, probable or possible espionage, sabotage, terrorism, or subversive activities" at any of the contractor's locations. The purpose of this requirement is to identify specific types of threat activity at contractor facilities that pose a risk to the protection of classified information, systems, or programs. Although this requirement is not directed to unclassified information or systems, contractors must report activities that otherwise meet the threshold for reporting, including activities that may have 'occurred' on its unclassified information systems.

More specifically, a cyber-intrusion² may fall under the reporting requirements of NISPOM paragraph 1-301, regardless of the classification level of information or information system involved in the intrusion, provided that the contractor has determined that (i) the facts and circumstances of the intrusion are sufficient to qualify as "actual, probable, or possible espionage, sabotage, terrorism, or subversive activities," and (ii) these activities constitute a threat to the protection of classified information, information systems, or programs that are otherwise covered by the NISPOM.

Thus, paragraph 1-301 does not establish a broad based reporting requirement regarding cyber incidents or intrusions occurring on the contractor's unclassified information systems -it is only directed to those intrusions that by their very nature are so serious as to pose a threat to classified information, systems, or programs.

When analyzing whether a cyber-intrusion appears to meet the reporting threshold, it may be beneficial to consider



established criteria for such significant threat activities. For example, Title 18, United States Code, characterizes espionage as "obtaining information about the national defense with intent, or reason to believe, that the information may be used to the injury of the United States or to the advantage of any foreign nation," and economic espionage as including "knowingly performing targeting or acquisition of trade secrets to knowingly benefit any foreign government, foreign instrumentality, or foreign agent."³

Although the NISPOM does not cover the protection of unclassified information or information systems, there are several other initiatives in these areas. For example, the Defense Industrial Base Cyber Security and Information Assurance (DIB CS/IA) program.⁴ In addition, the Department of Defense is developing implementation guidance for National Defense Authorization Act for Fiscal Year 2013 Section 941, "Reports to Department of Defense on Penetrations of Networks and Information Systems of Certain Contractors," which will clarify reporting of cyber incidents on contractor information systems, and should help resolve any confusion or potential overlap of activities under the DIB CSIIA program, the proposed DFARS revisions, and the NISPOM.

¹ As defined by the NISPOM, a "contractor" is any "industrial, educational, commercial or other entity that has been granted a facility clearance."

² An intrusion, as defined in the National Information Assurance Glossary, Committee on National Security Systems Instruction No. 4009, is the "unauthorized act of bypassing the security mechanisms of a system."

³ Sections 793 and 1831, respectively, of Title 18, U.S.C.

⁴ See Part 236, "Department of Defense [DIB] Voluntary [CS/IA] Activities," of Title 32, Code of Federal Regulations, established by interim final rule published on May 11, 2012 (77 FR 27615).

Note: Industrial Security letters are issued periodically to inform cleared Contractors, Government Contracting Activities and DoD Activities of developments relating to industrial security. The content of these letters are for information and clarification of existing policy and requirements. Suggestions for Industrial Security Letters are appreciated and should be submitted to the local Defense Security Service cognizant industrial security office. Articles and ideas contributed will become the property of DSS. Inquiries concerning specific information in Industrial Security Letters should be addressed to the cognizant DSS industrial security office.

National
Industrial
Security
Program
Operating
Manual

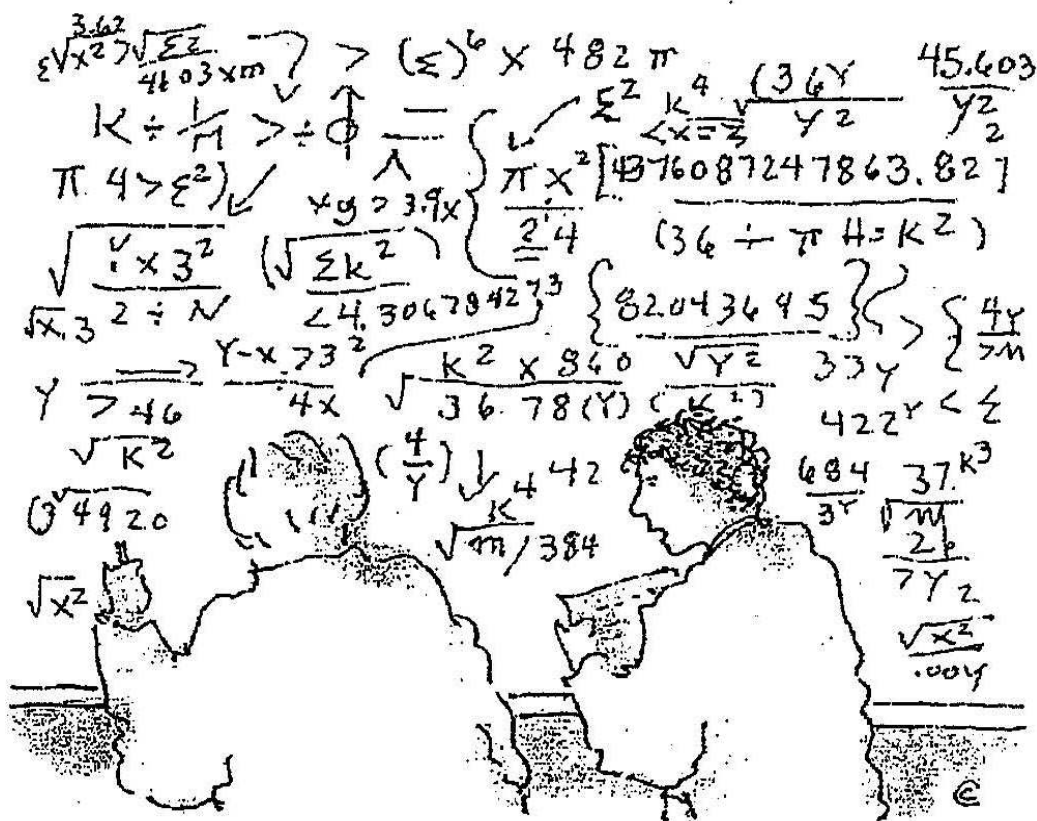




Definition of F&A Recovery

F&A recovery revenues are generated by the assessment of indirect cost expenses to individual sponsored projects. The assessment is accomplished through the charging of an F&A cost rate to most direct costs on an individual sponsored project account. The F&A cost rate is negotiated periodically (typically, every three to four years) between the University and the Federal agency assigned to the University (Department of Health and Human Services (DHHS)) for this purpose. The Facilities and Administrative cost rate is comprised of the following components, as defined by the Federal government. For example out current on campus research rate is 48%. See how that is allocated below:

<u>Facilities costs ("F" component) (22%)</u>	<u>Administrative costs ("A" component) (26%)</u>
<ul style="list-style-type: none"> • Building depreciation • Equipment depreciation • Interest • Operations & maintenance • Library 	<ul style="list-style-type: none"> • General administration • Department administration • Sponsored project administration • Student services administration



THE JOURNAL OF HIGHER EDUCATION

"This is the easy part. The challenge will be figuring out the indirect cost for the grant proposal!"

CAROL E. CARLIS



The Office of Sponsored Programs (OSP) is your starting point for doing business with UAH faculty, researcher staff, and students. OSP will prepare/process the following: **Teaming Agreement; Non-Disclosure Agreement; Equipment/Facility Use Agreement; Proposal Preparation; Letter of Support/Intent; Certifications and Representations; Review/negotiate/execute all contract documents and MORE!**

PROPOSAL PREPARATION

Cost estimating method used is based on percent of effort or fully burdens hourly rates and is consistent with our current cost accounting standards.

Ready-to-Submit Proposals are due to OSP five (5) working days prior to agency due date.

UAH FY begins 1 Oct
Proposal Fringe Rate: **34%**
Escalating factor: **4%**

Negotiated *F&A Cost Rates Effective:
10/1/12-9/30/16

- On-campus Research: **48%**
- On-campus Instructions: **50%**
- On-campus Other Sponsored Activities: **FY14-16: 32.5%**
- **Off-campus Research: **27.5%**
- Off-campus Instructions/Other Sponsored Activities: **26%**
- Intergovernmental Personnel Agreements (IPA): **10%**

These rates are based on Modified Total Direct Costs (MTDC).

F&A is not charged on **GRA Tuition, Equipment, Fellowships, and Scholarships.**

Only **the first** \$25,000 of each subcontract issued by UAH is subject to F&A.

*F&A: Facilities and Administrative Cost. (Indirect)

**Off-campus Research rate will be 26% if >50 miles from campus.



PROPOSAL/AWARD INFORMATION

GSA Schedule: GS-23F-0062P

CAGE Code: 9B944

DUNS# 949687123

EIN: 63-0520830

CCR Registration: Aug 99

UAH is self Insured

Legal Name:

The Board of Trustees of The University of Alabama, for and on behalf of The University of Alabama in Huntsville, *doing business as UAH*

Cognizant Audit Agency:

Office of Naval Research
Atlanta Regional Office
100 Alabama Street, NW
Suite 4-R15
Atlanta, GA 30303-3104
POC: Douglas Heaton, ACO
(404) 562-1611
Email: heatond@onr.navy.mil
Antoinette Bigby, Grants Specialist
(404) 562-1614
Email: bigbya@onr.navy.mil

WHAT YOU SHOULD KNOW

UAH is a state-funded institution of higher education. We enjoy sovereign immunity pursuant to Section 14, Article 1 of the Constitution of Alabama and therefore, cannot enter into any agreement which requires the following:

- Indemnification
- Governing by another state law
- Exclusive Agreements
- Claiming all intellectual property rights
- Payment of Program Management Facilitation Fee (PMFF)

Alternate language to some terms and conditions will be suggested upon review of all documents, when applicable.

The University's mission is teaching and research and sponsored research must be consistent with this mission. Therefore, UAH will make every effort to fulfill the requirements of the contract or grant, the proposed set of deliverables, and the timeline contained in the proposals.




For additional information, please visit our Web site:

<http://www.uah.edu/osp>

For all other inquires/assistance: Gloria Greene, Director, OSP (256) 824-2657, email: greeneg@uah.edu

Research Centers

Research Institute (RI) and Aerophysics Research Center (ARC) Steve Messervy, PhD, Director 256.464.6343 fax 256.464.6848 steve.messervy@uah.edu	Center for Applied Optics (CAO) Robert "Bob" Lindquist, PhD, Director 256.824.2530 fax: 256.824.6618 robert.lindquist@uah.edu	Center for Management & Economic Research (CMER) Jeff Thompson, Director 256.824.2605 fax 256.824.6060 Jeff.thompson@uah.edu
Center for Modeling, Simulation & Analysis (CMSA) Mikel Petty, PhD, Director 256.824.4368 fax 256.824.4322 pettym@email.uah.edu	 THE UNIVERSITY OF ALABAMA IN HUNTSVILLE	Center for Space Plasma & Aeronomic Research (CSPAR) Gary P Zank, PhD, Director 256.824.2482 fax 256.824.6575 Gary.Zank@uah.edu
Earth System Science Center (ESSC) John R. Christy, PhD, Director 256.961.7800 fax 256.961.7751 Christy@nsstc.uah.edu		Information Technology and Systems Center (ITSC) Sara Graves, PhD, Director 256.824.6868 fax 256.824.5149 sgraves@itsc.uah.edu
Propulsion Research Center (PRC) Robert Frederick, PhD, Director 256.824.7200 fax 256.824.7205 Robert.Frederick@uah.edu		Systems Management & Production Center (SMAP) Gary A. Maddux, PhD, Director 256.824.2679 fax 256.313.1922 gary.maddux@us.army.mil
Rotorcraft Systems Engineering and Simulation Center (RSESC) Dave Arterburn, Director 256.824.6846 fax 256.824.6791 Dave.arterburn@uah.edu		

Support Offices

Department	Purpose	POC
Contracts & Grants Accounting	Post Award. Charges on sponsored research contracts and grants and applicable Cost Share Accounts.	Ms. Valarie King, Director Email: Valarie.King@uah.edu Phone: 256.824. 2231 Website: http://www.uah.edu/admin/c-g/
Purchasing	Requisitions, purchase orders, P-cards, and any actions relating to purchasing.	Mr. Terence Haley, Dir., Procurement Services Email: Terence.haley@uah.edu Phone: 256.824.6674 Website: http://www.uah.edu/admin/bussvcs/
Compliance	University Compliance	Mr. John O. Cates, Chief Compliance Officer Email: john.cates@uah.edu Phone: 256.824.6633
Proposal Development Office	Provide new support options for UAH to increase expenditures from additional sources, and to increase UAH's lead and/or participate in large, multi-year grants and contracts.	Dr. Suzy Young, Director Email: Suzy.young@uah.edu Phone: 256-824-3448
Research Security	Security briefing, security badge and security clearances.	Ms. Denise Spiller, Director Email: Denise.Spiller@uah.edu Phone: 256.824.6444 Website: http://www.uah.edu/ras
Technology and Commercialization	Copyright Policy; Patent Policy; Income from Patents and Institutional Guidelines for the Reporting and Subsequent Processing of Inventions and Disclosures; Start-ups	Mr. Kannan Grant, Director Email: Kannan.grant@uah.edu Phone: 256.824.6620 Website: http://www.uah.edu/otc

The Office of Sponsored Programs' (OSP) mission is to support three distinct groups: 1) UAH faculty, students and research staff; 2) UAH administration; and 3) our funding sponsors. OSP strives to maintain balance among these groups by reviewing proposals to external funding agencies, proper fiscal management of funds received, and oversight of compliance matters related to external agencies and the federal government. OSP's role is to support the faculty, staff, and administration of UAH in effectively seeking, obtaining, and managing their research and scholarly activities to enhance their educational role.

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