SPONSORED RESEARCH NEWS

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

A Message from the Director:

The new Office of Management and Budget (OMB) 2CFR 200 Uniform Guidance, will affect all awards, to include continuation funding received on or after 26 December 2014. The implementation of Uniform Guidance will affect the daily administration at all institutions of higher education that conduct federally-supported research, including The University of Alabama in Huntsville. The Office of the Vice President for Research and Economic Development (OVPRED), Office of Sponsored Programs (OSP) and representatives from various departments on campus have assembled a project team to determine the impact of the new regulations to existing policies and processes.

A link to the UAH Uniform Guidance implementation plans is available on the OSP website. You will find information and links about Uniform Guidance and it impact on federally sponsored research. all will post updates and implementation plans as they become available on the UAH Uniform Guidance website. We have formed a UAH Uniform Guidance Project Team, chaired by Dr. Lindquist, Associate VPRED. We are currently looking at the new guidance and compare the new requirements to our existing policies and procedures; provide suggestions/recommendations on potential changes; note any red flags that may directly impact our current way of doing business; and develop draft policies, procedures and processes to ensure compliance. The changes will be submitted to the committee chair for review and comments.

Many areas under sponsored programs will be impacted by the new guidance. We reviewed those areas that will have a significant impact on sponsored programs, and formed teams based on six critical areas. Team leaders are Diane Gibbs and Casey Steins, *Payroll*; Terence Haley, *Procurement*, Don Thompson, *Assets Management*, Candi Horch, *Effort Reporting*, Valarie King, *billing*, and Steve Parker, *Subrecipients and Subcontracting*. To ensure we are compliant Robert Leonard, AVP for Business Services will review how these changes might directly impact our *Cost Accounting Standards, F&A Rates and/or Disclosure Statement*.

Please visit the website for updates and information from various organizations such as the *Council on Governmental Relations (COGR)* and the *Federal Demonstration Partnership (FDP)*, on the new Uniform Guidance and how other universities are implementing these changes. In addition, you can follow our progress via the UAH Uniform Guidance Timeline and read team reports as they are posted. Our final objective is to communicate these changes to the research community, seek input from senior administration, educate the research community, post the relevant changes on applicable websites and implement these changes in accordance with the OMB guidelines.

Hopefully, the information in this edition will help inform and educate you on what to expect. We have created a *Uniform Guidance PI Quick Reference Guide*, (Volume 1, Version 1 – October 27, 2014), this version will highlight major changes in the Uniform Guidance affecting proposal budgets and charging of direct cost. The link to the guide is on the OSP website.

Sweeping changes such as the Uniform Guidance don't happen often. In fact, OMB Circular A21*Cost Principles for Educational Institutions* was issued December 19, 1973 and OMB Circular A-133 – Audits of States, Local Governments and Non-Profit Organizations – currently in use was issued under the *Single Audit Act* of 1984 and the Single Audit Act Amendments of 1996. That being said, we ask that you work with us and be patience. There are no best practices—yet. We will continue to collaborate with other institutions and federal organizations for answers and the best way forward. Consider this your guide to the OMB Uniform Guidance.

Finally, we have been busy working on ways to assist the UAH Research Community. For starters we have a new training program called Charger Sponsored Program Administration Network (CSPAN), which offers a Sponsored Programs Administration Certification, "How To" Fridays, OSP Tidbit Thursday Videos and On-line Webinars, manuals and general information. We would like to send a special thanks to everyone who have and will volunteer their time as either a presenter or contributor. We could not do this without your support.

Gloria W. Greene, MA, CRA, Director
UAH Office of Sponsored Programs

Government Property Custodian and Researcher On-Line Training

Effective Spring 2015, all persons identified as Principal Investigators (PI) of a research award or property custodian of Government Property must complete and pass initial on-line Government Property Training. Employees will be notified via email, with a link to the on-line training. You will have 10 working days after initial notification to complete the on-line training. The official UAH campus email provided to the employee will be the communication method of notification.

The employee must complete and pass the initial Government Property training module with a score of 70% or higher. Failure to pass the module will result in denial of access to Government Property, including a hold being placed on any requisitions or transfer requests currently in process.

Training certification is valid for one (1) year from completion of the initial or refresher training module. The employee is required to complete an annual refresher module prior to certification expiration certifying that they have read, understand, and agree to the information contained within the module. Failure to complete the refresher module by the date of certification expiration will result in all associated purchase requisitions and transfer requests being placed on hold for thirty (30) calendar days or until completion. Failure to complete the refresher module within thirty (30) calendar days after certification expiration will result in all associated purchase requisitions and transfer requests being cancelled and will require the employee to complete and pass the initial training module before gaining access to Government Property.

Any questions concerning this training process should be directed to either Scott Sandlin, scott.sandlin@uah.edu, 256-824-2662 or Gloria Greene, greeneg@uah.edu, 256-824-2657. ■

OSP Tidbit Thursday Videos

The Office of Sponsored Programs is preparing several training video's to assist and inform the UAH Research Community in all facets of Sponsored Research, pre- and post-award functions. The videos will be released the first Thursday of each month, under the label "Tidbit Thursday Video." The average viewing time of each video is estimated to be 3-5 minutes.

An announcement will be placed in the UAH Office of Marketing and Communications email, with the title of the presentation and a link.

After watching the video's, and if you have additional questions, please feel free to contact the Office of Sponsored Programs. All videos will be available for viewing at any time, after release on the OSP Website, under the link "Tidbit Thursday Video." The link to the video can be found on the UAH OSP website. ■

Charger Sponsored Program Administration Network (CSPAN)

CSPAN is a campus-wide educational program for all faculty and staff involved with research at the University of Alabama in Huntsville (UAH). The program includes the following:

(A) **SPA (Sponsored Programs Administration) Certification** is a series of classes designed to help individuals build competencies and increase knowledge in areas related to sponsored research with the goal of increasing overall efficiency and effectiveness in the daily administration of sponsored research.

(1) **Faculty Certification**: Designed specifically for researchers that will serve as Principle Investigator, and

(2) **Staff Certification**: Presented twice a year with 3 levels of certification possible.

(B) Brown Bag Luncheons (Roundtable Discussions) will be offered during noon-time sessions, covering general topics throughout the year. Presentations by faculty, agency representatives, and various on-campus SMEs will be available. Individual departments/ centers will be able to schedule training/ briefings that tailor to their specific needs, according to availability.

(C) Seminars/ Workshops will be offered quarterly. These in-depth presentations will be facilitated by SMEs, both internal

and external to the university, on topics of great interest to the research community as a whole. RCR credit will also be available during some of these sessions.

(D) "How To" Fridays are interactive sessions that will be offered twice a month. They will educate participants on how to successfully utilize various agencies' proposal/ award portals. These sessions will also offer training on how to process internal actions, such as subcontracts, vendor bids, service centers, etc.

(E) Tidbit Thursdays are currently available on OSP's website as short YouTube videos intended to elaborate on processes and procedures that typically do not require face-to-face interaction for an understanding of the material.

(F) On-line webinars, manuals, and general information will include general information that does not require a facilitator for an understanding of the material. This material will be available through OSP's website.

The Office of the Vice President for Research and Economic Development (OVPRED) offers several continuing education and training opportunities designed to support, develop and maintain a standardized body of knowledge and best-practice methodology for all research personnel at UAH. The curriculum includes traditional classes and lectures, interactive workshops, online instruction and educational resources provided to ensure compliance with federal regulations and to enhance the overall productivity of researchers.

The courses in the Certification Program are intended for employees who currently perform or anticipate assuming duties and responsibilities related to the administration of contracts and grants. They are ideal for someone new to the profession or as a refresher for a more seasoned administrator. The comprehensive curriculum for Track I provides an overview and introduction to the broad field of research administration and management. Elements of the curriculum include understanding the environment and context within which research administration is conducted as it relates to such diverse areas as research law, research ethics, fiscal management, regulatory compliance, sponsored program administration, and pre- and post-award management. (See Page 5 for Track I overview.)

For additional information please contact Tonia Pitts, CRA, Research Education Administrator X2651 or pittas@uah.edu. ■

Fall 2015 Responsible Conduct of Research (RCR) Face-to-Face Training: 24-25 September 2015

In *Introduction to the Responsible Conduct of Research*, a publication of the Office of Research Integrity, Nicholas H. Steneck writes, "In general terms, responsible conduct in research is simply good citizenship applied to professional life. Researchers who report their work honestly, accurately, efficiently, and objectively are on the right road when it comes to responsible conduct."
RCR training is an Office of Research Integrity (ORI) requirement for institutions receiving federal research funding. The purpose of RCR is to ensure that researchers understand and apply responsible research conduct and ethics. The minimum required RCR training is a total of eight (8) hours, which at least six (6) hours must be face-to-face and two (2) hours must be web

-based and a refresher (3 hours) every four years.

OSP will host the Fall 2015 RCR sessions on the 24th and 25th of September 2015. Registration and location of training will be announced. If it has been four or more years since you completed RCR face-to-face training, we recommend you sign up for one of the sessions being offered. Course Descriptions for Fall 2015 are as follows:

Case Studies in Research Misconduct: A review of new and historic cases involving accusations of research misconduct in biology, chemistry, physics and medicine provide some insightful examples of both responsibly and irresponsibly conducted science. Research integrity is of paramount importance to our institutions and noncompliance with modern RCR standards can result in severe penalties to the organization, the individual(s), and their reputations. But the modern definition of research misconduct is relatively new, having evolved from hundreds of years of social and ethical issues that have arisen in the practice of scientific research. So what may have been acceptable practice a century ago may be considered unacceptable practice by today's standards. In this highly interactive session, participants will become familiar with an international case history of research misconduct and will engage in discussion of how these prominent cases have shaped contemporary perspectives on the responsible conduct of research

Conflicts of Interest: Different types of conflicts of interest and commitment will be described, governing principles will be explained, and ethical issues encountered by researchers and research administrators will be examined.
Human Subject Research: The primary policies and procedures regarding Institutional Review Boards (IRB) and the protection of human subjects in research will be discussed.
Animal Welfare: Primary principles regarding Institutional Animal Care and Use Committee (IACUC) standards for the protection of animals in research will be explained.

For additional information please contact Felecia Troupe, Associate Director/Research Compliance, X2660 or troupef@uah.edu ■
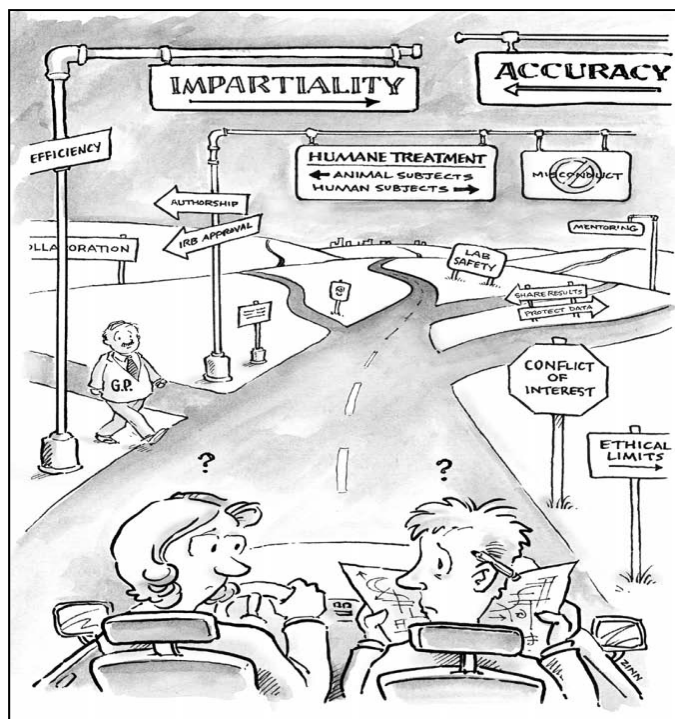
Setting off on the road to the responsible conduct of research

Requisition and PCard Approval on Sponsored Projects and Cost Share Accounts

Effective January 5, 2015 Contracts & Grants Accounting (C&G) will approve all requisitions and PCard transactions for sponsored projects and cost share accounts. Cost are allocable to a particular federal award if the goods or services are chargeable or assignable in relation to the benefits received. In the new uniform guidance, the university is only allowed to retain $5,000 of unused supplies at the end of a federal award. All requisitions must be submitted no later than 60 days before the end date of the award unless a risk memo is in place to request a no cost extension.

Requisitions:
Equipment: C&G will continue to use the *tangible property purchase approval form* for equipment and non-consumable supplies transactions . This form must be approved by Scott Sandlin prior to entering a requisition in banner and will serve as supporting documentation for C&G to approve the requisition. We will except electronic signatures on this form if you have this option available on your computer. You can locate this form at http://www.uah.edu/osp/research-forms-and-documents/research -forms.

Sub Contracts: The Office of Sponsored Programs (OSP) will continue to send you a memo to encumber funds with your sub contract distributions. This memo should be attached to the email notification sent to C&G to approve the requisition. Your email should be sent to the appropriate accountant (http://www.uah.edu/c-g/agency-distribution) that administer that particular contract or grant. Please include the *requisition number and the agency in the subject line of your email*.

Example: Subject: R007999 - W31P4Q-12-D-0011 (DOD)

PCard Transactions:
All PCard transactions on sponsored projects and cost share accounts require approval from C&G. An email should be sent to the respective accountant with a copy of the invoice or receipt within 24 hours outlining the items purchased and the amount of the transaction. A justification should accompany PCard transaction within 60 days of the end date to provide documentation the University is not spending down funds.

If you have any questions, please contact Ms. Valarie King, CPA Director, Contracts & Grants Accounting, Valarie.king@uah.edu or 256-824-2231. ∎

Funding Agency Updates

Notice Regarding Requirement of Grantees and Contractors to Submit Invention Disclosures, Related Reports and Documents Via iEdison

Notice Number: NOT-OD-15-080, Release Date: March 17, 2015, Announcements : NOT-OD-15-004
The purpose of this Guide Notice is to inform Grantees and Contractors that NIH requires all invention disclosures, related reports and documents to be submitted electronically via Interagency Edison (iEdison).

Background: It is NIH's policy that the results and accomplishments of the activities that it funds should be made available to the public. Program Directors/Principal Investigators (PD/PIs) and funding recipients are expected to make the results and accomplishments of their activities available to the research community and to the public at large. If the outcomes of the research result in inventions, the provisions of the Bayh-Dole Act of 1980, as amended, and set forth at 35 U.S.C. § 200 et. al. and implemented at 37 C.F.R. § 401, apply. iEdison has been available since 1995 and the majority of NIH grantees and contractors use iEdison to comply with the requirements of the Bayh Dole Act.

Electronic Reporting Via iEdison Required: Bayh-Dole regulations permit funding recipients to report inventions electronically (37 CFR 401.16). To meet the objectives of the Federal Financial Assistance Management Improvement Act of 1999 (P.L. 106-107), NIH requires electronic reporting through an internet-based system, iEdison (http://iEdison.gov). iEdison supports confidential transmission of required information and provides a utility for generating reports and reminders of pending reporting deadlines.

All required iEdison submissions that are submitted via fax, mail, drop offs, etc. will not be accepted and will be returned to the submitter.

NIH Intellectual Property Policies and Notices in the NIH Guide for Grants and Contracts applicable to Extramural Awards are available at the following URL: http://grants.nih.gov/grants/intell -property.htm.   Additionally, information about how to use Interagency Edison and information about the iEdison system which is managed by NIH and used by more than 30 federal agency offices is available at the following URL: http://era.nih.gov/iedison/iedison.cfm. ∎

 National Science Foundation

The NSF Proposal and Award Policies and Procedures Guide (PAPPG) has been revised to implement 2 CFR § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). The Uniform Guidance incorporates language from eight existing Office of Management and Budget (OMB) circulars into one consolidated set of guidance in the Code of Federal Regulations. Additional information on the consolidation effort can be found on the website of the Council on Financial Assistance Reform (COFAR).

A summary of the significant changes can be found on the website at the following link: http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/sigchanges.jsp ∎

National Science Foundation Adopts New Accountability and Transparency Practices By FASEB OPA | December 18, 2014 By Meghan McCabe

Over the course of the last year, the National Science Foundation (NSF) has been developing a new Transparency and Accountability Initiative designed to "build and sustain the

Track I: Overview of Research Administration and Management

Date	Course/Topic	Description
3/13/2015	**(A) Introduction to Research at UAH** Presenters: Dr. Bob Lindquist, OVPRED Gloria Greene, OSP **(B) Researcher's Resources (OSP Website &** **Additional Research Departments)** Presenters: Tonia Pitts, OSP Susan Phelan, OPD	Participants will gain knowledge of the various offices and personnel associated with pre-award sponsored research management and will be able to identify appropriate individuals to contact for assistance.
3/20/2015	**(C) Identifying Types of Sponsored Research Awards** Presenters: Kenya Cole-Jones, OSP Bob Lyons: Advancement **(D) Finding Funding** Presenters: Katherine Engberg, OPD Kenya Cole-Jones, OSP	This session will cover the components of various award agents, distinguish between gifts and awards, and explain the implications of "strings attached or unattached." It will also offer tips for successfully seeking out, applying to, and checking the status of proposal applications. Participants will be prepared to assist faculty in completing the proposal package, be knowledgeable in reading and interpreting guidelines, and will be cognizant of the university's processing requirements.
4/3/2015	**(E) Basic Budgeting (Allowable v. Unallowable/Direct** **v. Indirect)** Presenters: Valarie King, CG&A Tonia Pitts, OSP **(F) Understanding Banner and Your Account** **Statements – Budgets/Department Analyst** Presenters: Teresa Shurtz, OVPRED Tammy Haymon, OVPRED	Participants will be able to construct an effective project/program budget utilizing their knowledge of federal, state, and university requirements and will be able to determine how costs may be appropriately applied, transferred, and modified using these same criteria. Cost sharing also will be discussed. They will understand how to access additional information to identify accurate costs.
4/10/2015	**(G) Life Cycle of a Grant Award** Presenters: Valarie King, CG&A Petra Dotson, OSP **(H) Basic Purchasing Concerns & Distinguishing** **between Consultants, Subcontractors and Vendors** Presenters: Terence Haley, Business Services Steve Parker,OSP Valarie King, CG&A	Designed to provide an overview of the "post-award" area within research administration, this workshop will explore key areas of responsibility so that key personnel will understand how these offices serve them in managing sponsored program activities.
4/17/2015	**(I) Institutional, Agency & Federal Regulations** Presenters: John Cates, Office of Counsel Felecia Troupe, OSP Becky England, OTC Denise Spiller, Research Security **(J) What's at Risk** Presenters: Tharanee Ravindran, Auditing Felecia Troupe, OSP	In the complex world of research administration, compliance has become a key measurement of an institution's commitment to do the right thing. While everyone's cooperation is needed to implement a successful compliance program, there may be varying opinions as to the level of intensity or commitment required, depending on their roles and responsibilities. This presentation will review the different elements of research compliance and how they can be interwoven within the principles of research integrity in order to build a strong, ethical, and compliant institutional foundation.
4/24/2015	# Graduation	

public trust" in the agency as "sound stewards of federal investments." The effort began in December 2013 when NSF issued a statement on improving policies and procedures related to grant titles and nontechnical abstracts. Several months later, in March 2014, NSF issued additional guidance to University Presidents and the heads of other grantee organizations to clarify the policy changes.

At last month's meeting of the National Science Board (NSB), NSF Director France Córdova, PhD, briefed members about the new transparency and accountability practices that are being implemented at the agency. Dr. Córdova told the NSB, "Good stewardship of public resources requires ongoing examination of our processes and continuous improvement. We will continue to convey the significance of our science and engineering research in supporting the national interest." A full summary of the Transparency and Accountability Initiative can be found on the NSF webpage.

The Proposal and Award Policies and Procedures Guide for NSF-funded investigators has been officially updated to reflect the ongoing work of the Transparency and Accountability Initiative. The new guidance indicates that should a proposal be recommended for award, the principal investigator will be contacted by an NSF Program Officer to review the project abstract and title to ensure that both clearly articulate the justification for awarding public funds.■

## Understanding OMB Uniform Guidance and Its Impact on Sponsored Programs

(*Used by Permission: Troy Rector and Deby MacLeod,* clarknuber.com Mar-Apr 2013)

The OMB Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards (Uniform Guidance) is the largest change to the OMB circulars impacting grant compliance in many years. It consolidates eight existing OMB Circulars (including A-122, A-87, A-21, A-102, A-110 and A-133) and intends to provide uniformity across organization types.

It also updates language to reflect current business practices such as electronic submissions of information, with anticipation of an even greater reliance on future advancements of information technology. The Uniform Guidance will be applicable to Federal grants and cooperative agreements that involve state, local and tribal governments, as well as institutions of higher education and nonprofit organizations.

While the OMB continues to refine language based on public comment, the following are some highlights from the proposed Uniform Guidance as it stands:

UAH Expanding Horizons
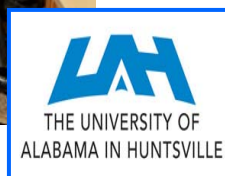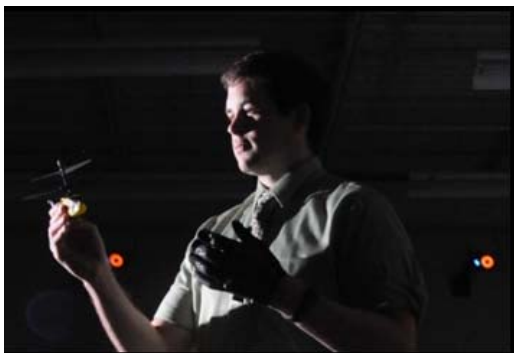
Be a recognized leader of education and research in:

- **Aerospace and Systems Engineering**
- **Biotechnology**
- **Cybersecurity and Big Data**
- **Earth, Atmospheric, and Space Science**
- **Gaming and Entertainment Arts**

Announcements of Funding Opportunities and Merit-Based Review (Section .204): This section would (1) require Federal awarding agencies to publicly announce funding opportunities for discretionary Federal financial assistance programs using the Grants.gov website and (2) provide for an application period of no less than 30 days. In the announcement, the Federal agency will be required to communicate certain information including the criteria being used by the Federal agency to review applications. The Federal agency will also be required to identify any limitations on the recovery of indirect costs in the announcement. These changes will ensure that entities are made aware of all discretionary funding opportunities and the criteria to be used by the Federal agency in evaluating the merit of proposals.

Post-Federal Award Requirements (Subchapter E): These requirements identify what an organization is required to follow throughout the Federal post-award period. While Subchapter E mostly incorporates provisions of OMB Circular A-110 into the Uniform Guidance, language from A-102 was added if found to be more clear than A-110. A new section titled Subrecipient Monitoring and Management was added to co-locate guidance on the oversight of subawards that was previously located in other OMB Circulars primarily from OMB Circular A-133 and the OMB Compliance Supplement. The proposed Uniform Guidance also clarifies that the small purchase threshold of $150,000 should be used in certain procurements and that the threshold for requiring suspension and debarment procedures is set at $25,000.

Cost Principles: Efforts were made by OMB to consolidate OMB Circulars A-21, A-87 and A-122 into one set of cost principles to eliminate duplicative language and develop one approach where various requirements existed previously, especially as it relates to wage allocations. The Uniform Guidance also makes significant changes to indirect cost recovery. The following is a summary of some key provisions and changes:

Indirect Cost Recovery – For most entities who recover indirect costs from either direct Federal awards or pass-through awards, this will be a section of particular importance. The Uniform Guidance identifies that Federal awarding agencies and pass-through entities should pay federally negotiated indirect cost rates unless a lower rate is required by law or regulation or approved by a Federal agency head based on documented justification, and the justification must be made publicly available. Entities with a federally negotiated indirect cost rate will also be given a one-time option for a 4-year extension of their indirect cost rate, though the extension would require approval of the organization's cognizant agency. If the extension is elected and approved, the organization would not have the ability to renegotiate their indirect cost rate during the 4-year extension period.

For those entities not having a formally negotiated indirect cost rate, the Uniform Guidance provides for a de minimus indirect cost rate of 10% of modified total direct costs for a period of four years in order to provide the organization time to develop capacity to enter into indirect cost negotiations. The use of a de minimus indirect cost rate must also be provided in certain circumstances by pass-through entities to subrecipients unless another indirect cost rate is negotiated between the two parties using applicable Federal guidance.

Wage allocations – The OMB recognizes that much time and effort is spent in supporting allocations of wages charged to Federal awards, as well as between direct and indirect cost categories. The Uniform Guidance provides for certifications of payroll somewhat similar to OMB Circular A-87 and also discusses integration of necessary information into an organization's automated payroll distribution system in order to reduce duplication of effort. The Uniform Guidance focuses on minimum requirements that a system must have to support the allocation of wages.

Use Allowance – A use allowance was previously identified as an allowable method for recovering cost of purchasing assets. However, the use allowance was been deleted as an option from the Uniform Guidance leaving depreciation as the exclusive means of recovery *Computer Supplies* – Language is included in the Uniform Guidance to clearly allow for the costs of certain computing devices to be treated as supplies. Computing devices and related equipment would now explicitly be allowed as supplies as long as the purchase price is below the lower of $5,000 or the organization's capitalization threshold, included in their approved Disclosure Statement (DS2) and Cost Accounting Standards (CASB), which we (UAH) have not done.

Other Provisions – Section .615 adds a small but new section identifying criteria that must be met for administrative and clerical costs to be charged as a direct cost. Section .506 discusses procedures to follow when an organization wants to use electronic copies of paper items as a substitute for the original records.

The Uniform Guidance includes a provision where reporting packages (single audit reports and financial statements) will be available for viewing on a website, thereby circumventing the existing requirement to file a Freedom of Information Act request to view an entity's financial statements.

The Uniform Guidance also states that the OMB will review and consider amending the Uniform Guidance every 5 years, which

will provide for an ongoing, periodic assessment. However, entities still have a chance to submit public comments and influence the rule making process.

The Uniform Guidance represents a significant amount of effort to consolidate and modernize existing OMB circulars and to use the Single Audit as an oversight tool to reduce waste, fraud and abuse.

Following is a summary of the more significant changes to OMB Circular A-133 and the Single Audit Requirements.
Increase the threshold for Single Audit from $500,000 to $750,000 – The threshold for the Single Audit Requirement would be raised from $500,000 to $750,000. This change is

intended to reduce the audit burden on relatively smaller organizations, while allowing Federal agencies to focus more directly on higher risk entities and increase audit follow-up. Records for all organizations must be made available for review or audit by appropriate officials of the Federal agency, pass-through entity, and the Government Accountability Office.

Streamline the types of compliance requirements in the Compliance Supplement – The guidance limits the types of compliance requirements in the Compliance Supplement and focuses on those, if violated, deemed most likely to result in disallowed costs, waste, fraud, or abuse. The number of types of compliance requirements have been reduced from 14 to the following 6:

- Activities Allowed or Unallowed and Allowable Costs/Costs Principles (the guidance notes that this requirement could include some testing of Period of Availability and Matching)
- Cash Management
- Eligibility
- Reporting
- Subrecipient Monitoring
- Special Tests and Provisions

The guidance would permit Federal agencies to request that some of the deleted types of compliance requirements be added to the Special Tests and Provisions requirement for programs where they could be considered essential to the oversight of the program.

Changes in the Major Program determination– The guidance change all four steps the auditor takes in determining which programs will be audited. The goal is to reduce the audit burden on non-Federal organizations that materially comply, as evidenced by consistent unqualified audit opinions with no material internal control weaknesses or material questioned costs reported. The change would increase focus on highest risk programs and reduce the number of programs tested.

The guidance also reduce the minimum audit coverage required. Currently, the auditor must audit programs whose expenditures, in aggregate, encompass at least 50% of an organization's total Federal expenditures, or 25% for a low-risk auditee. The updated coverage threshold would is reduced to 40%, and to 20% for low-risk auditees.

Clarified definition of low-risk auditee – As noted above, required coverage for a low-risk auditee is lower, thus generally reducing the number of major programs audited. Under current rules, an organization qualifies as a low-risk auditee if:

- Single Audits were performed on an annual basis
- The auditor opinions on both the financial statements and the schedule of expenditures of federal awards were unqualified
- No deficiencies in internal control deemed to be material weaknesses under government auditing standards were reported
- In the prior two years none of the following were reported concerning a major program audited:
- A material weakness in internal control
- Material non-compliance with requirements for a major program
- Known or likely questioned costs exceeding 5% of the

major program audited

The guidance retains these requirements. However, language has been added to clearly specify the data collection form submission must have been made within the required timeframe. The guidance also specifies that the auditor must not have reported a substantial doubt about the auditee's ability to continue as a going concern.

Increase in threshold for questioned costs – The threshold for reporting questioned costs would increase from $10,000 to $25,000 to focus on audit findings presenting the greatest level of risk. This is expected to reduce the number of smaller audit findings that require follow-up time, yet may not be indicative of significant weaknesses in internal control.

Reporting packages submitted to the Federal Clearinghouse made publicly available – The contents of the reporting package submitted to the Federal Clearinghouse would not change. However, the guidance specifies that the "Federal Clearinghouse designated by OMB is authorized to make the reporting package and the form publicly available on a website…." Therefore, organizations should expect that their entire reporting package, not just the data collection form, will likely be made available to the public.

The guidance will result in the most significant changes in financial management and operation of Federal programs in many years. ∎

The University of Alabama in Huntsville "Go-Live" Uniform Guidance Checklist

(Are we in compliance with the New Regulations?)

1. Communication:	
✔	Alert the research community, including Principal Investigators and support staff of the upcoming December 26, 2014 effective date, what it means and how their work will be impacted.
✔	Provide resources – web links, contacts and other materials to aid individuals in need of assistance.
2. Policy and Procedures Updates:	
✔	Review and update institutional policies and procedures impacted by the changes within the Uniform Guidance, including those heavily impacted: Direct charging Effort Reporting Procurement Sponsored Project Compensation
✔	Embed appropriate internal controls within procedures to maintain compliance with policy and federal regulations.
✔	Determine if your institution will operate in compliance with the new or old procurement standards for the first full fiscal year that begins after December 26th and document this determination
3. Disclosure Statement (DS-2) Update:	
X	Determine if updates to the DS-2 are required for consistency with policies and compliance with the Uniform Guidance
X	Determine your institution's necessary timeline for submitting DS-2 updates: As soon as possible after 12/26/2014; Prior to the award of a CAS-covered contract; 6 months before the effective date or start of fiscal year; or With the next indirect cost rate proposal submission
X	Assemble a work team charged with preparing and submitting updates to the DS-2
4. Outgoing Proposals	
✔	Notify Principal Investigators and their support staff that proposals submitted after December 26, 2014 will be developed in accordance with the Uniform Guidance and any updated institutional policies.
✔	Review all out going proposals submitted after December 26, 2014 to ensure compliance with Uniform Guidance and updated institutional policies.
5. Incoming Awards:	
✔	Notify Principal Investigators and support staff that awards made after December 26, 2014 including some incremental funding, will be managed in accordance with the Uniform Guidance and any updated institutional policies.
✔	Manage awards made after December 26, 2014 in accordance with the Uniform Guidance and updated institutional policies.
✔	Updated subaward templates to provide subrecipients with all required information.
✔	Identify cases where prior approval is required for administrative and clerical salaries charged directly to sponsored awards.
6. Groundwork for Indirect Cost and Fringe Benefit Rate Updates:	
X	Identify key changes to the institutional indirect cost rate calculation process and make any necessary system (e.g. tracking and coding) updates
X	Determine if the fringe benefit rate should be updated to incorporate a terminal leave and initiate the calculation and negotiation process

✔ = Completed   X = In progress

Roles and Responsibilities: PI and OSP

Principal Investigator (PI)	Office of Sponsored Programs (OSP)
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. • Reviews sponsor requirements—both standard and non- standard. • Develops the technical narrative and determines the resources necessary to complete the project. • Provides data for the budget 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, cost sharing, 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 Equipment 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 Conflict of Interest, Financial Disclosure, etc., if required; ensures all other Sr/Key Persons do the same. • Upload all applicable documents in accordance with agency requirements. • Release the proposal to OSP for budget, final review and submission to sponsor.	• 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.

Working with Office of Proposal Development (OPD)

Office of Sponsored Programs (OSP)	Office of Proposal Development (OPD)
• **Proposal development (budget and applicable agency forms, such as certifications, assurances, etc.) excluding the technical scope** • **Coordinate subrecipients/contactor proposal development** • **Communicate solicitation requirements to all parties** • **Review, routing, final approval and submission of the proposal to sponsoring agency**	• **Assisting the researchers in identifying new research opportunities** • **Coordinating the proposal process for long-term and/ or multi-institutional opportunities** • **Facilitating networking strategies to explore new possibilities for research** • **Oversee technical writing, editing and final review, prior to submitting proposal to OSP**

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.

*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.

THE UNIVERSITY OF
ALABAMA IN HUNTSVILLE

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

Office of Sponsored Programs

Gloria Greene, MA, CRA, Director (256) 821-2657 **Kenya Cole-Jones, MBA, Senior Associate Director, (256) 824-2647** **Felecia Troupe, MBA, Associate Director, (256) 824-2660**	**Steve Parker, CPRA, Contract Specialist, (256) 824-2654** **Tonia Pitts, CRA, Research Ed. Administrator, (256) 824-2651** **Woodonna Deerman, Contracts Assistant (256) 824-2661**	**Randy Barbour, MBA, Administrator ITSC & COS, (256) 824-6946** **Petra Dotson, Administrator, ESSC & Jacobs Contract (256) 824-6467** **Natalie Parker, Administrator CSPAR, (256) 824-5592**
Mirael Parker-Davis, Assistant RESEC & SED Contract (256) 824-2656 **Veronica Chkadua Coordinator, College of Science, (256) 824-2404** **Kelly Haas, Administrator, RI & AMCOM EXPRESS (256) 824-2406** **Jessica McComb, Administrator, COE, ALDOT, SMDC (256) 824-2649**	THE UNIVERSITY OF ALABAMA IN HUNTSVILLE	**Mark Massey, Administrator, PRC, CMSA, NASA/UAH Coop. Agreement (256) 824-2658** **Jenni Moody, Coordinator, College of Engineering, (256) 824-6385** **Jana Savanapridi, CPRA, Coordinator, Colleges of Nursing, Liberal Arts and Business (256) 824-2702** **Consuela Duckworth, Administrator SMAP and ED Contract (256) 824-2650**
Christopher Sledge, Contracts Assistant (256) 824-3804 **John Rogers, IT (256) 824-2648**	**Angela Beasley, Administrator, CAO, College of Nursing, Liberal Arts, Business and Provost (256) 824-2659**	**Scott Sandlin, IT (256) 824-2662** **Drew Hamilton, IT (256) 824-2653** **Darrin Belue, IT (256) 824-2926**

Support Offices

Department	Purpose	POC
Contracts & Grants Accounting	Post Award. Charges on sponsored research contracts and grants, requisition approval, 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
Office of Proposal Development	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/rsa
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.