This newsletter is produced by the Office of Sponsored Projects to provide agency updates, sponsor policy and procedural information, and guidance and training in all aspects of sponsored project administration for Researchers and Research Administrators. Please visit http://www.research.brown.edu/rschadmin/OSP_Newsletter.php for archives.

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OSP / OVPR UPDATES

- **OSP Winter Break Schedule**

  In observance of the University's winter break, the Office of Sponsored Projects (OSP) will close at 5p.m. on Thursday, **December 22, 2011** and will reopen **Monday, January 2, 2012**. If any business emergency should arise during the winter break, please leave a message at 401-863-2777. Messages will be retrieved daily.

  If you anticipate submitting proposals with early January deadlines, please inform your Contract Administrator so they are prepared to review your proposal in a timely manner.

- **Feedback on the A-21 Task Force on Reducing Regulatory Burden - Proposed Revisions to OMB Circular A-21 “Cost Principles for Educational Institutions”**

  In the September Newsletter we wrote about Brown University’s response to the A-21 Task Force on Reducing Regulatory Burden regarding revisions that should be made to OMB Circular A-21. As of November, the A-21 Task Force has received 154 comments from various institutions of higher education, medical centers, research institutions, associations, and individuals. The summary of comments can be viewed from the Research Business Models Website (http://rbm.nih.gov/a21_comment_summary.doc).

  In summary, the majority of the comments echoed Brown’s position, indicating that universities are highly affected by the burden of Circular A-21 and other federal requirements. The most prevalent topics addressed include:
  - Effort Reporting requirements
  - Lack of ability to directly charge administrative support costs
  - Inconsistency of overhead costs and regulatory and compliance burdens among various sponsoring agencies

  The task force is now preparing its recommendations for action.
FEDERAL UPDATES

Office of Management and Budget (OMB) Provides Guidance to Federal Agencies to Accelerate the Spending of Remaining American Recovery and Reinvestment Act (ARRA) Funds for Discretionary Grant Programs

OMB M-11-34

Despite the rapid pace of spending of Recovery Act funds over the past 30 months, there remain billions in discretionary Recovery Act funds, that, although have been obligated, have not yet been expended. In light of that, on September 15, 2011, OMB issued the Memorandum for the Heads of Executive Departments and Agencies instructing them to accelerate the spending of remaining Recovery Act funds in discretionary grant programs, consistent with existing laws and regulations and programmatic objectives. To that end, Agencies are directed to take steps to complete the Recovery Act projects by September 30, 2013 and if funds have not been spent by that date, agencies shall reclaim the unspent funds to the extent permitted by law.

Federal Agencies may request waivers from the September 30, 2013 deadline for discretionary grant funds by September 30, 2012, for the following reasons:

- Contractual commitments by the grantee with vendors or sub-recipients prevent adjusting the timeline for spending;
- A project must undergo a complex environmental review that cannot be completed within this timeframe;
- Programs are long-term by design (such as the majority of the High Speed Rail programs) and therefore acceleration would compromise core programmatic goals;
- Other special circumstances exist.

Agencies may revise the terms of Recovery Act discretionary grant agreements, to the extent permitted by law, to provide for reclamation of funds that remain unspent after September 30, 2013, absent a waiver issued by OMB pursuant to this memorandum.

Specific Agency responses from NSF, NIH, and AHRQ are summarized below.

AGENCY RESPONSES TO OMB M-11-34

NSF


NSF’s Implementation of OMB memorandum M-11-34

The purpose is to notify awardees:

- For awards scheduled to end on or before 09/30/2013, No Cost Extensions (that go beyond 09/30/2013) will require prior approval.
  - Requests for No Cost Extensions must be submitted by June 1, 2012.
  - Approval will be granted only if OMB issues a waiver and if the request falls into one of four categories outlined by OMB M-11-34.

OMB and NSF continue to strongly encourage grantees to responsibly accelerate expenditures for all active ARRA grants regardless of the current expiration date. All expenditures must be allowable pursuant to applicable cost principles and that requested payments must be necessary to meet current needs.

NIH

Recovery Act: Notice of Revised Term of Award for All Recovery Act Awards to Ensure Project Completion by September 30, 2011

NOT-OD-12-0104

NIH has released guidance to Grantees regarding the impact of the accelerated spending memo (OMB M-11-34) that OMB released in September. Following are the key impacts broken down into three categories:

- Grants that Currently End September 1, 2012 – August 31, 2013 and “Could” Extend Beyond September 30, 2013 with an Initial Automatic No-Cost Extension
  - Grant awards in this category will be revised to limit the automatic extension authority so that such extensions may not go beyond 9/30/2013.

- Grants that Currently End September 1, 2013 – September 30, 2013
  - For Grant awards in this category no automatic extension will be available.
  - Awards will be revised to remove the automatic no-cost extension provision and in turn replace this with a prior approval requirement.
Grants with Project Period End Dates Extending Beyond September 30, 2013

- Awards will be revised to remove the automatic provision and replace it with a prior approval requirement.
- NIH staff administering these grants will also reach out to recipients to discuss possible strategies for accelerating progress and expenditures.

For any Recovery Act award anticipated to continue past September 30, 2013, NIH recipients must notify the Grants Management Officer listed on the Notice of Award in writing that an extension of the final budget period of the project period is vital for the completion of the project. All requests must be made by OSP and received by the agency before June 1, 2012, regardless of the current project period end date.

AHRQ

UPDATE to American Reinvestment and Recovery Act (ARRA): AHRQ Grant Policy Notice Regarding Removing Expanded Authorities and No Cost Extensions for AHRQ ARRA Grants

NOT-HS-12-0012

Based on the policy guidance from OMB M-11-34 (described above under Federal Updates), AHRQ is notifying its ARRA grant recipients that AHRQ's original policy of generally not intending to allow no cost extensions for Recovery Act grants is modified as follows:

AHRQ does not anticipate that any AHRQ ARRA grant with a project period end date of September 29, 2013, qualifies for consideration of submission of a waiver by the Director of AHRQ or HHS to OMB to extend beyond the original project period end date. **AHRQ does not intend to allow any no cost extensions for Recovery Act grants with project period end dates of September 29, 2013.**

Generally, in no case, will the project period end date extend beyond September 30, 2013.

If the recipient believes that its project warrants an exception to this policy, it must submit a request, endorsed by the authorized institutional official, to AHRQ Grants Management no later than June 29, 2012 for review and consideration. (The request must contain compelling rationale and documentation to support the submission of a waiver request by AHRQ to OMB)

AGENCY UPDATES

NIH UPDATES

- The NIH Operates under a Continuing Resolution Which Continues Government Operations through December 16, 2011 at the FY 2011 Level Minus 1.5 Percent

NOT-OD-12-017

The Department of Health and Human Services (DHHS) including the NIH operates under a Continuing Resolution (CR) that was enacted on November 19, 2011. The CR continues government operations through December 16, 2011 at the FY 2011 level minus 1.5 percent.

Until FY 2012 appropriations are enacted, NIH will issue non-competitive research grant awards at a level below that indicated on the most recent Notice of Award (generally up to 90% of the previously committed level). Upward adjustments to awarded levels will be considered after the FY 2012 appropriations are enacted but NIH expects institutions to monitor their expenditures carefully during this period.

- Notice of Expanded Transparency Act Subaward and Executive Compensation Reporting Requirements for FY 2012 and Beyond

NOT-OD-12-010

The Federal Funding Accountability and Transparency Act of 2006 (FFATA), ensures that information on federally funded grants and contracts is available to the public via an online, searchable database (USASpending.gov). Grantee institutions are responsible for reporting executive compensation and subaward information in the Federal Subaward Reporting System. As of November 10, 2011, NIH has expanded the Transparency Act reporting requirements. In addition to all new awards (type 1), any subsequent actions on new (type 1) awards made since October 1, 2010 fall under the new reporting requirement. For example, Brown University is now required to report on the non-competing continuation (type 5) of a new award made December 2010.

To help grantees specifically identify awards subject to the subaward and executive compensation reporting requirements described above, NIH will classify each award using the applicable term below. **This language will appear in the Terms and**
Conditions section (Section III) of each Notice of Award issued on or after November 10, 2011.

- **Eligible for FFATA Reporting:** “Based on the Project Period Start date of this project, this award is likely subject to the Transparency Act subaward and executive compensation reporting requirements of 2 CFR Part 170. There are conditions that may exclude this award; see [http://grants.nih.gov/grants/policy/awardconditions.htm](http://grants.nih.gov/grants/policy/awardconditions.htm) for additional award applicability information.”

- **Not Eligible for FFATA Reporting:** “This award is not subject to the Transparency Act subaward and executive compensation reporting requirement of 2 CFR Part 170.”

*All FFATA Reports are prepared and submitted to FSRS.gov by OSP.*

**AGENCY TIP – Guidelines for Entering the Organization Name & DUNS number on the R&R Budget form of Subawards**

When submitting subaward budgets on the R&R Budget form to Federal agencies, please adhere to the following guidelines:

- Use the official name of the Organization; do not use Acronyms or Abbreviations.
  (In the example below, “The Miriam Hospital” is the official name).

- Confirm that the DUNS number entered in the Organizational DUNS number field corresponds to the Organization name entered. Organizations can have various DUNS numbers for unique entities within the organization (i.e. a medical division at a University vs. the main University).

<table>
<thead>
<tr>
<th>* ORGANIZATIONAL DUNS:</th>
<th>0639027040000</th>
</tr>
</thead>
<tbody>
<tr>
<td>* Budget Type:</td>
<td>☑ Subaward/Consortium</td>
</tr>
</tbody>
</table>

**RESEARCH & RELATED BUDGET - SECTION A & B, BUDGET PERIOD**

- * Start Date:  | * End Date:  |
- * Start Date:  | * End Date:  |
- Budget Period: 1

Dun & Bradstreet website offer a free service to look up DUNS numbers by Organization or by the DUNS number: [https://smallbusiness.dnb.com/ePlatform/servlet/DUNSAvancedCompanySearch?storeId=10001&catalogId=70001](https://smallbusiness.dnb.com/ePlatform/servlet/DUNSAvancedCompanySearch?storeId=10001&catalogId=70001)

**Note** – if an Acronym is used or the DUNS number does not match the name of the organization, you may receive a warning message from an agency indicating that “multiple Subaward Organizations were found on the basis of the DUNS number entered.”
Across
3. Another word for F&A Rates
4. Number of digits required for a zip code by Grants.gov
7. Brown University’s Grant Management System
9. Project Summary for a NSF proposal must include an explicit description of _________ Impacts
10. OMB Circular: Cost Principles for Educational Institutions
13. Web based version of Coeus
15. NASA’s Solicitation and Proposal Integrated Review and Evaluation System
16. Coeus Guru
17. NIH may allow you to submit this type of budget if the direct costs in each year do not exceed $250,000
19. Prohibited by NSF

Down
1. OSP is located in this building
2. All NSF Proposals require this attachment
5. Allows a PI additional time to complete the scope of work of her/his project without additional funding
6. Coeus wild card used for searching
8. Type of Benefit Rate
11. When you prepare and route your proposal through Coeus you no longer need to submit this (Acronym)
12. Project Summary for a NSF proposal must include an explicit description of _________ Merit
14. In July 2011, this threshold has increased from $3,000 to $5,000
18. You need to submit this to request an Advanced Account, Pre-Award Costs or a No Cost Extension (Acronym)
**COEUS UPDATES**

### COEUS NEWS

**Updates to the Coeus User Guide Web Page**

The Coeus User Guide Web Page ([http://www.research.brown.edu/osp/coeus/Training/User_Guides.html](http://www.research.brown.edu/osp/coeus/Training/User_Guides.html)) has been updated. The following guides have been revised/added:

- **Coeus PREMIUM Proposal Preparation Guide** – The only modification to this guide was the title and the Coeus version number.

- **Coeus LITE Proposal Preparation Guide** – Detailed instructions on how to create and submit proposals in Coeus Lite.

- **NIH S2S Forms Guide** – Guide shows how your R01 submissions are mapped to the Grants.gov forms. (This is not a new guide; it just was not been posted on the website.)

- **NSF S2S Forms Guide** – Guide shows how your NSF submissions are mapped to the Grants.gov and NSF specific forms.

**Coeus Help Email should be used for all Inquiries**

Please contact Coeus_Help@brown.edu for all inquiries, including requests to add sponsors, organizations, update rolodex entries, and general questions.

This will ensure that your inquiry is routed to the appropriate person and answered in a timely manner.

### COEUS TIP OF THE MONTH

**Navigating to the Attachments in the Approval Routing Window in Premium**

When proposals are returned to Departments for corrections, Contract Administrators will attach a document, that outlines their comments and corrections that need to be made, in the Approval Routing Window.

Instructions on how to access the comments/corrections attachment while the proposal is in “Rejected” Status are as follow:

1. In the Proposal Record, select Action → Show Routing from the menu bar to open the Proposal Routing Window. Click on the [Show Previous Submission] button in the Proposal Routing Window.

   ![Proposal Routing Window]

   The History Details Window will be displayed:

2. In the History Details Window, click on Approval Stop that has the following symbol next to it [×].

   ![History Details Window]

   Upon clicking on that Approval Stop, the bottom portion of the History Details Window will indicate who rejected the proposal.

3. Click on the individual that rejected the proposal.

   ![Sequential Stop 1]

   Upon clicking on the individual that rejected the proposal, the bottom portion of the History Details Window will display Comments and Attachments information.

4. To access the Attachment, click on the Attachments Tab. To open the attachment, click on the PDF Symbol next to the Description.

   ![Comments and Attachments]
OSP TRAINING SPOTLIGHT

***New Classes***

Research Equipment and Property Management

This class covers practices, policy and regulations concerning the management of all Brown-held equipment. Attendees will develop a better understanding of Brown purchasing and inventory practices, including, but not limited to, research equipment. This class is intended for lab managers, individuals responsible for purchasing equipment and managing department inventory. In addition, all faculty and department managers are welcomed to attend.

Register for Research Equipment and Property Management

How to Read a Funding Opportunity Announcement

This workshop will offer an in-depth overview of the initial stage of the Proposal Development process, **Reading the Funding Opportunity Announcement (FOA)**. It will define and review the various types of Federal and Private Foundation funding opportunity announcements available. Participants will learn to identify the key components of an announcement, e.g. research objectives, eligibility, dates, available funds, content, forms, budget requirements, & special terms and conditions. Various examples of actual Federal and Private FOAs will be provided and reviewed.

The goal of this workshop is to provide context and organize workflow of the proposal preparation process based on the requirements of the funding opportunity announcement. It is intended for individuals with limited proposal preparation experience; however those with experience are welcomed to attend as well.

Register for How to Read a Funding Opportunity Announcement

ABOUT OSP TRAINING

The Office of Sponsored Projects is pleased to offer numerous training opportunities for faculty and staff that range from how to use Coeus to guidelines on pre or post award management:

**Coeus Training**

Learn how to use the University's sponsored projects management system, Coeus. Classes include creating proposals, budgets, submitting Grants.gov proposals, and viewing proposal and award records.

http://training.brown.edu/index.php?campaign=71

**Post Award Training**

Learn best practices in Post Award management. Sessions covering travel, commitments, administrative costs, and other areas of post award administration are offered.

http://training.brown.edu/index.php?campaign=72

**Pre Award Training**

Learn best practices in Pre-Award management. Sessions covering preparation of proposals, budgets, negotiation of terms and conditions of awards, issuance of subcontracts and other areas of pre-award administration are offered.

http://training.brown.edu/index.php?campaign=126

All Sponsored Projects training sessions:

http://training.brown.edu/index.php?campaign=68

**GRANT CONFERENCES/NCURA EDUCATIONAL PROGRAMS**

- **Second National Science Foundation Grants Conference FY’12**  
  **March 19 – 20, 2012**  
  Chicago, Illinois  
  Registration will begin December 2011  
  (Send an email to nsf_regional@nsf.gov to be notified once the conference website is available.)

This two-day conference is a must, especially for new faculty, researchers and administrators who want to gain key insight into a wide range of current issues at NSF. For more information please visit: http://www.nsf.gov/bfa/dias/policy/outreach.jsp.

- **NCURA – Save the Date!**  
  **Region 1 Spring Meeting**  
  **May 6 – 9, 2012**  
  Newport, Rhode Island  
  For more information please visit: www.ncuraregion1.org

OSP SCHEDULING TRAINING MODULES FOR SPRING SEMESTER

OSP is in the process of scheduling classes for the spring semester. We will be decreasing the frequency of classes that have had a low attendance rate over the fall semester to once a month, every other month, or quarterly depending on demand over the past semester.

Please see the updated list of Sponsored Projects Training Classes for class descriptions and frequency:

http://research.brown.edu/rschadmin/Training/Sponsored_Projects_Training_Classes.pdf
# SPONSORED PROJECTS REPORTING

## Reporting Update

- **Investigator Report Updated as of December 31, 2011**
  
  *Changes include the following:*
  
  - Proposal dollars no longer contain Revised Budget amounts
  - Direct/Indirect dollars are now listed on the Summary & Detail Award Reports
  - Award Start and End Date reflect obligated funding period

- **New Report Available to Department – Report of Active Awards**
  
  *Report includes various prompts to refine selection:*
  
  - Prompts for: Department, PI, Sponsor and Status
  - The Status Prompt allows you to refine active awards (e.g. all active awards, or active awards with final report pending)

- **Updated Custom Proposal Report**
  
  *Development Proposal Number added to Custom Proposal Report*
  
  - Both Development Proposal Number and Institute Proposal number can be included on report

## Reporting User Group

- **January 26th, 2012 - 11:00am**
  
  BOB 2nd Floor Conference Room
  
  • All welcome to attend

## Agenda

- Review of New Reports:
  
  - Departmental Investigator Report
  - Report of Active Awards
  - Future Enhancement to Reports – Prompts that will enable users to schedule reports

## Requesting an Ad Hoc Sponsored Projects Report

- All Sponsor Projects report requests should be sent to: **OSP_Reporting@brown.edu**

  In addition, a new form has been created to be used to request ad hoc reports:


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**Key to the OSP Crossword Puzzle!**

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Questions or comments about the Newsletter should be directed to the editors:

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Jennifer Quinn, Research Services Manager (Jennifer_Quinn@brown.edu)