U.S. Federal Awards FACT SHEET

If you are the recipient of a U.S. federally funded award, you must adhere to specific compliance requirements.

U.S. federally funded awards include all awards received directly from U.S. government agencies (including NIH, NSF, and DoE), as well as all funding from U.S. government agencies which is passed on through intermediate entities (e.g. NIH funding passed on by the University of Washington).

For NIH policies that cover eligibility of expenditures, audit requirements, administrative requirements, etc., please review the NIH Grants Policy Statement.

1.   Annual Audit: Your award will be subject to an annual audit in accordance with Subpart F of 2 CFR 200 (for all grants unrelated to the US Department of Health and Human Services, DHHS), and / or Subpart F of 45 CFR 75 (for all grants issued by the US DHHS, including all NIH grants). The US CFR (or Code of Federal Regulations) is the U.S. government's primary policy and operations manual, and as recipients of US government funding, the terms and conditions contained in these documents are flowed down via the Notices of Award. These "Uniform Guidance" audits follow U.S. guidelines and are more stringent than Canadian audits on grants. External auditors paid for by the University will perform these audits. In addition, Research Finance (RF) will carry out spot audits throughout the year.

2.   Time and Effort Reporting: The annual audit requires adequate time and effort reporting, which certifies that salaries charged to Research PGs match the effort expended by those individuals on the award. Please ensure a review of salary charges i s done from time to time throughout the year to ensure a proper matching of time and effort. If an employee does not spend time on the research project equal to the percentage of his time charged to the PG, a Change of Appointment form should be sent to payroll to reconcile the cost to the PG in accordance with time spent on the work. Twice a year RF will confirm that employee time charged to these awards is appropriate. The external auditors will also test this area.

3.   Equipment Inventory: Any equipment purchased with U.S. federal funds needs to be tracked and itemized. Equipment records shall be maintained accurately and shall include the following information:

(i) A description of the equipment.

(ii) Manufacturer's serial number, model number, Federal stock number, national stock number, and/or other identification numbers.

(iii) Source of funding for the equipment, including the "Federal Award Identification Number".

(iv) Whether title vests in the Institution or the US Federal Government.

(v) Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost of the item.

(vi) Information from which one can calculate the percentage of US Federal participation in the cost of the equipment (not applicable to equipment furnished by the US Federal Government).

(vii) Location, use, and condition of the equipment and the date the information was reported.

(viii) Unit acquisition cost.

(ix) Ultimate disposition data, including date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the Federal awarding agency for its share.

(from 2 CFR 200.313 and 45 CFR 75.320)

Physical counts will be conducted by the PI's Department every two years and compared to the equipment listing. RF will also conduct periodic confirmation of equipment purchases with the researcher. No assets may be given away, re-sold, or disposed of without obtaining proper independent confirmation of the resale value, and payment of this resale value. Failing to keep an asset available for inspection constitutes misuse of sponsor funds. Please also note that the University's policies on Ownership (Policy #109) and Disposal of Surplus Equipment and Materials (Policy #108) also apply.

4.   **Extensions**: U.S. federal funds that are unspent at the award end date must be returned to the sponsor. RF will monitor and contact researchers as end dates approach, but it remains the researcher's responsibility to cease spending, or to request an extension where required. NIH offers a maximum extension of up to one year after the expiry of your grant term provided that this is requested prior to the end date; please contact Office of Research Services (ORS) to invoke this extension.

For any directly funded U.S. federal awards that are governed by a contract or an agreement, please contact the University-Industry Liaison Office (UILO) to seek an extension. For indirectly funded awards (e.g. funding from another university), an extension should be requested from the sponsoring institution, and confirmation of the extension date should be sent to the UILO. A new Research Project Budget will be issued to extend the end-date if the extension is approved.

So that over-expenditures are not assumed, in accordance with UBC Policy #90 Section 1.5, "Where a Researcher anticipates a renewal or other source of funding beyond the designated "end date" of the [U.S. federally funded] PG, the Researcher shall notify [RF and their representative from the ORS or the UILO] prior to such end date." The researcher and their unit will bear the responsibility for any over-expenditures or costs arising when an extension is not applied for or granted.

5.   Eligible expenses: A background regarding cost considerations for NIH grants can be found in Section 7 of the NIH Grants Policy Statement - a chart showing a select list of expense examples is provided near the end; other US Federal agencies also have their own guidelines regarding expense eligibility. Additional cost considerations can be found in the US government's "Uniform Guidance" – i.e. Subpart E of both [2 CFR 200](#) and [45 CFR 75](#). In addition, the individual award agreement may define specific areas of ineligible expenditure. It is the researcher's responsibility to ensure that all expenses charged to the grant account are eligible according to the funding agency's relevant policies.

6.   EPLS: US Federal monies are not allowed to be spent on vendors named in the Excluded Parties List System (EPLS). Researchers are to consult this list whenever they are dealing with new vendors to verify that the vendor is not on the list. The EPLS can be found at https://www.sam.gov/portal/public/SAM/ under "Data Access".

7.   Cost transfers: Journal transfers of costs into U.S. federally funded PGs from other PGs must identify the original invoice or expense source, and the expenses in question must be related to the research in the U.S. federally funded PG. Transfers to correct clerical/bookkeeping errors must be completed within 90 days of discovery of the error, and be supported by documentation as to how the error occurred, with certification that the move is final and correct. Entries to simply transfer a deficit balance from another PG are not permitted. More info is available under [Section 7.5 of the NIH Grants Policy Statement](#).

8.   **Overhead**: All overhead is recovered by the University, where a portion is returned to the faculty and/or facility where the Research PG resides. The UILO website provides information for researchers including the specific amounts of overhead required. Please refer to this prior to submitting your award applications or statements of work (with budget proposals) at: www.uilo.ubc.ca/researcher_polcies. Unless specifically requested, researchers should include appropriate overhead in their charge-out rates, their project costs, etc. In the case of NIH budgets, all budgets should state UBC's 8% Facilities and Administrative (F&A) Costs as a separate line item. This is always the case, even when UBC is not the lead institution. For more information on NIH F&A Costs, see https://grants.nih.gov/grants/guide/notice-files/NOT-OD-02-004.html

9.   Research Performance Progress Report (RPPR): NIH began implementing the Federal-wide RPPR in the Fall of 2012. **NIH now requires use of the [RPPR](#)module in eRA Commons to submit ALL annual progress reports.**

One significant change that comes with the RPPR process is automatic screening for compliance with the [NIH public access policy](#). This policy requires that manuscripts resulting from NIH funding be deposited with the PubMed Central archive. Researcher will need to use [My NCBI](#)to enter papers onto progress reports. Publications and manuscripts listed in the progress report and falling under the NIH Public Access policy must include the PubMed Central reference number. NIH will not award non-competing continuation awards when the RPPR publications are not in compliance with the Public Access Policy.

More information is available at [NIH RPPR Instruction Guide](#)and [RPPR Frequently Asked Questions](#).

10.   Closeout: Closeout of an NIH award is the process by which NIH determines that all applicable administrative actions and all required work of an award have been completed by the researcher and NIH. Beginning October 1, 2014 NIH updated its closeout process based on new HHS closeout policies.   Failure to submit timely and accurate final reports may affect future funding to the organization.

Researcher must ensure all applicable closeout reports are submitted no later than 120 days after the project end date as follows:

•   Final Federal Financial Report (except for Fellowships): to be prepared and submitted by RF

•   Final Progress Report (except for Fellowships for which the Termination Notice will continue to serve as the Final Progress Report): to be prepared and submitted by researcher

•   Final Invention Statement and Certification (except for Training grants, Fellowships, and certain other programs—e.g., activity codes C06, R13, R25, S10) : to be prepared by researcher and approved by UILO. Final submission will be handled by ORS.

•   Termination Notice (PHS 416-7) This form is required for Fellowships and Training grants. It summarizes the information that must be supplied by Ruth L. Kirschstein National Research Service Award (NRSA) recipients on termination of their award and for a limited period thereafter. It must be submitted within 90 days of the fellow or trainee's appointment.

11.   NIH Public Access Policy: NIH requires that articles supported by NIH-funded research be included in PubMed Central, the NIH digital archive of full-text, peer-reviewed journal articles. Its content is publicly accessible, free, and integrated with other databases. Please visit the NIH Public Access Policy for more information.

To add your article to PubMed Central, log in to the NIH manuscript submission system with your eRA Commons ID. The system will generate an email message asking you to verify the submission.