

Federal Research Policy Update: The Research Terms and Conditions (RTCs) & Final Research Performance Progress Report (FRPPR)

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Speakers

- Michelle G. Bulls
Director, Office of Policy for Extramural
Research Administration
National Institutes of Health
- Jean I. Feldman
Head, Policy Office
Office of Budget, Finance & Award
Management
National Science Foundation

Research Terms and Conditions (RTCs) Update

3

Research Terms and Conditions

- The purpose of the activity was to develop a revised set of Research Terms and Conditions (RTC) to implement the Uniform Guidance.
- The RTCs will apply to research and research-related grants made by the participating agencies to institutions of higher education and non-profit organizations.

4

Participating Agencies

- Department of Agriculture: NIFA
- Department of Commerce: NIST/NOAA
- Department of Homeland Security
- Department of Energy
- Department of Transportation: FAA
- Environmental Protection Agency
- NASA
- NIH – co-Chair
- NSF – co-Chair

5

High Level Concept

Research Terms and Conditions Overlay to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), 2 CFR § 200

June 4, 2015

These Research Terms and Conditions implement the requirements of the [Uniform Guidance](#), issued by the U.S. Office of Management and Budget, as it applies to research and research-related grants made by the Federal awarding agencies specified below to institutions of higher education and non-profit organizations. While the Uniform Guidance outlines provisions that are specific to research, these terms and conditions:

- Incorporate the entire Uniform Guidance by reference, clarifying or supplementing select provisions where appropriate and consistent with government-wide research policy.
- Apply to an award when included as part of the award or when incorporated in the award by reference.

In addition to these Research Terms and Conditions, recipients also must review the following companion resources:

- Appendix A, Prior Approval Matrix, which will be finalized upon completion and approval of this document.
- Appendix B, Subaward Requirements Matrix, which will be finalized upon completion and approval of this document.
- Appendix C, National Policy Requirements Matrix, which will be finalized upon completion and approval of this document.

The agencies participating in this activity include the: U. S. Department of Commerce/National Oceanic and Atmospheric Administration and National Institute of Standards and Technology; U.S. Department of Energy; U.S. Environmental Protection Agency; National Aeronautics and Space Administration; National Science Foundation; U.S. Department of Health and Human Services/National Institutes of Health; U.S. Department of Agriculture/National Institute of Food and Agriculture; U.S. Department of Transportation/Federal Aviation Administration; and U.S. Department of Homeland Security.

Clarity is provided only for the specific Uniform Guidance provisions that are noted in the following table. Unless noted below, the Uniform Guidance provisions apply to these Research General Terms and Conditions as written in 2 CFR § 200. Recipients must also refer to Agency-Specific Requirements, which will be finalized upon completion and approval of this document.

Uniform Guidance	Proposed Research Terms Clarification
Subpart A – Acronyms and Definitions §200.17 Cluster of programs.	Subpart A – Acronyms and Definitions §200.17 Cluster of programs.
<i>Cluster of programs</i> means a grouping of closely related programs that share common compliance requirements. The types of clusters of programs are research and development (R&D), student financial aid (SFA), and other clusters. "Other clusters" are as defined by OMB in the compliance supplement or as designated by a state for Federal awards the state provides to its subrecipients that meet the definition of a cluster of programs. When designating an "other cluster," a state must identify the Federal awards included in the cluster and advise the subrecipients of compliance requirements applicable to the cluster, consistent with	All awards issued that include these Research Terms and Conditions as part of the award or incorporate them in the award by reference meet the definition of "Research and Development (R&D)" at 2 CFR § 200.87. As such, auditees should identify them as part of the R&D cluster on the Schedule of Expenditures of Federal Awards (SEFA). The

High Level Concept (Cont'd)

- The Research Terms and Conditions Overlay will:
 - Incorporate the entire Uniform Guidance by reference and provide additional clarity for select provisions.
 - Incorporate by reference the OMB Frequently Asked Questions, which have the full force and effect of the Uniform Guidance.
 - Apply to an award when included as part of the award or when incorporated in the award by reference.
 - Apply to research and research-related grants made by the participating agencies to institutions of higher education and non-profit organizations.

7

Companion Documents

The following additional documents will be included in the implementation:

- Appendix A, Prior Approval Matrix
- Appendix B, Subaward Requirements Matrix
- Appendix C, National Policy Requirements Matrix

These documents will be finalized upon completion and approval of the RTCs Overlay.

8

Federal Register Comment Process

- The Request for public comment on the Draft Research Terms and Conditions Overlay was published in the Federal Register on October 14, 2015.
- The comments period closed December 14, 2015.
- 122 comments were received from over a dozen organizations/ entities, including the Council on Governmental Relations.

9

Federal Register Comments, by Topic

200.17	Cluster of Programs
200.110	Effective Date
200.112	Conflict of Interest
200.211	Public Access
200.300	National Policy Requirements
200.306	Cost Sharing
200.307	Program Income
200.308	Revision of Budget
200.318	Procurement Standards
200.320	Methods of Payment
200.332	Fixed Amount Subawards
200.400	Policy Guide
200.407	Prior Written Approval
200.439	Equipment and Other Capital Expenditures
200.456	Participant Support Costs
N/A	Appendices, Agency-specific Requirements, Federal Participation or Corrections

Federal Register Comments: Themes

The Federal Register comments can be grouped into 3 overarching themes:

- Requests
- Concerns
- Positive Feedback

11

Federal Register Comments: Themes (Cont'd)

Requests for:

- Additional clarification
- Deviations from the Uniform Guidance
- Incorporation of technical changes to the Uniform Guidance from September 2015

12

Federal Register Comments: Themes (Cont'd)

Concerns over:

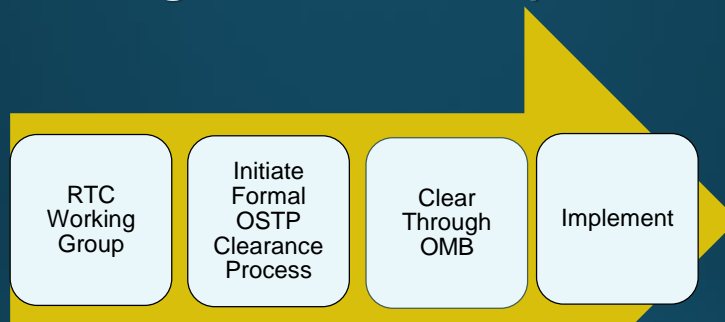
- The inclusion of references to OMB FAQs
- Agency implementation plans and agency participation

Positive Feedback:

- Received for many sections of the Draft Research Terms and Conditions Overlay

13

High Level Next Steps....



RTC working Group reconvened and resolved comments.

- RBM
- SBS Subcommittee
- Committee on Science

OMB/OFFM will conduct Regulatory Review of the Final RTCs.

Each agency will implement according to the agency implementation plan.

14

Final Research Performance Progress Report (RPPR) Update

15

Final Research Performance Progress Report (RPPR)

- The purpose of the activity was to develop a standard format for use in reporting final progress on Federally-funded research projects and research-related activities.
- A format had already been developed and implemented for use in submission of interim reports and the Working Group considered the lessons learned from implementation of the RPPR in development of the format for use in submission of final reports.

16

Participating Agencies

- Department of Agriculture: NIFA
- Department of Commerce: NIST/NOAA
- Department of Defense
- Department of Education
- Department of Energy
- Department of Homeland Security
- Department of Justice
- Environmental Protection Agency
- NASA
- National Endowment for the Humanities
- NIH – co-Chair
- NSF – co-Chair

17

High Level Concept

- The Working Group determined that use of the existing RPPR format, with some modification, would make it easier for recipients to navigate through the F-RPPR based on their familiarity with the existing format of the annual RPPR.
- The Working Group continued to standardize the types of information required in annual and final performance reports in an effort to reduce administrative burden and associated costs.
- The Final RPPR:
 - Does not change the performance reporting requirements specified in 2 CFR § 200.
 - Will be used by agencies that support research and research-related activities for use in submission of progress reports.
 - Creates greater consistency in the administration of Federal research awards.

18

Revised RPPR format - Report Components and Reporting Categories

- Mandatory Category:
 - Accomplishments: What was done? What was learned?
- Optional Categories:
 - Products: What has the project produced?
 - Participants & Other Collaborating Organizations: Who has been involved?
 - Impact: What was the impact of the project? How has it contributed?
 - Changes/Problems
 - Special Reporting Requirements (where applicable)
 - Budgetary Information
 - Project Outcomes: What were the outcomes of the award? (NEW)
 - Appendix: Demographic Information for Significant Contributors
- Updated RPPR Data Dictionary to include Final RPPR requirements

19

Summary of Significant Changes

- One report format for both interim and final reports
- Existing mandatory/optional categories retained
- One optional category added: Project Outcomes
- Language changes:
 - Language clarified throughout the document
 - Verbs made past tense where necessary
 - More inclusive of research-related activities
- New information, questions, instructions added:
 - Products Section: New examples of “other products”;
 - Participants Section: question on changes in active other support; and
 - Impact Section: question on the impact on teaching and educational experiences.

20

NSF Implementation

- The RPPR is already used to satisfy reporting requirements for closeout, i.e., the final annual report is the final report.
- The format will continue to be the same as the current interim/annual report, with the changes made through the revision process.
- NSF already has implemented a requirement for a separate Project Outcomes Report. This report is publicly available on the NSF website. These reports, prepared specifically for the public, serve as a brief summary of the nature and outcomes of the project, and address the intellectual merit and broader impacts of the work as defined in the NSF merit review criteria.

21

NIH Implementation

- Will replace the final progress report requirement for closeout
- The format will be the same as the current interim/annual RPPR
- New requirement – Outcomes section will be publicly available, allowing recipients the opportunity to provide the general public with a concise summary of the cumulative outcome or findings of the project (analogous to the Project Summary/Abstract section of the competing application).

22

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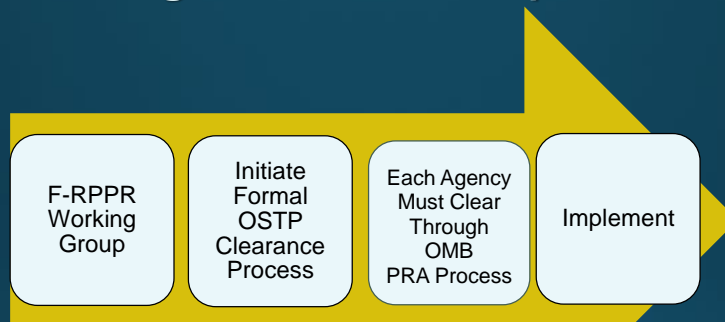
Final RPPR Next Steps

High Level Next Steps:

- Formal OSTP Clearance Process has been initiated
- Clear through OMB
- Participating Agency Implementation

23

High Level Next Steps....



F-RPPR working Group reconvened and resolved comments.

- RBM
- SBS Subcommittee
- Committee on Science

Each agency must separately clear their proposed RPPR format with OMB/OIRA

Each agency will implement according to the agency implementation plan.

24

High Level Next Steps....



Implement

Each agency
will implement
according to
the agency
implementation
plan.

25

Resources

- Federal-Wide Research Terms and Conditions:
<http://www.nsf.gov/awards/managing/rtc.jsp>
- Final Research Performance Progress Report:
<http://www.nsf.gov/bfa/dias/policy/rppr/index.jsp>
- Visit <https://cfo.gov/cofar/> for the latest information,
including OMB FAQs

26

Questions?

