

**April 21, 2009 Grants Policy Committee Stakeholders' Webcast  
Selected Questions and Answers as of 5/5/09**

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- **How does Grants.gov, Research.gov, USASpending.gov and Federal Reporting.gov differ or are duplicative? Is there legislation pending to make Grants.gov the “official” portal? How does that affect Research.gov?**
  - There is duplication and will exist until streamlining can hit mainstream USA. Duplication can not be avoided in this kind of stand up. Not everything about these sites is duplicative; there are fundamental differences between the initial offerings through Grants.gov and what Research.gov was designed to be. Grants.gov is a mechanism for ‘find and apply’ where as Research.gov and the other two centers of excellence consortia are a ‘receive out of the box’ for agencies that participate.
  - The direction we are moving in, as a government, is to create a single reporting mechanism, but this is not likely to happen in the near future. P.L. 106-107 has been introduced to Congress for reauthorization and includes a proposal for an end-to-end grants system that would be similar to Grants.gov, but with broader functionality. Currently, the legislation has passed the Senate and is with the House for consideration. A single source solution could very well be the result if the legislation is passed, but implementation will take time. In the mean time, Congressional legislation is requiring the creation of sites like USASpending.gov and FederalReporting.gov while agency-specific legislation and statutory requirements built into agencies are creating sites liked Research.gov to meet the needs of the community more immediately.
- **OMB Director Orszag asked the Department of Health and Human Services (HHS) and the General Services Administration (GSA) to enhance Grants.gov capacity to assist in the application process. As we approach the National Institute of Health (NIH) Challenge Grant April 27 deadline, have those enhancements been made?**
  - To date, there have been ongoing enhancements to Grants.gov. Preliminary reports show that the functionality and speed of the system has improved. More improvements are slated to take place in the coming months. In the mean time, a close eye is being kept on Grants.gov and the feedback coming in from agencies and users to help with improvement efforts.
- **I am very worried about the cost of all the new reporting requirements under the American Recovery and Reinvestment Act of 2009 (ARRA). How will my state cover these costs? Are they indirect costs? Will we have access to such funds for indirect costs throughout the entire grant period?**
  - OMB is aware of the concern surrounding the cost for states to meet the new reporting requirements under ARRA. Currently, there is not a firm answer to this question. Every state has it own cost allocation plans, which are the current method in which states will cover the administrative burden. OMB is in discussions to determine if states can use funds from ARRA to cover administrative costs. This is a question best posed at the Association of Government Accountants (AGA) forum. By that time, there

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will have been broader discussion on the topic and OMB will be able to speak more specifically.

- **Universities have invested tens of millions of dollars in Grants.gov. Is OMB now stating that agencies can use any system they want? Should universities not be allowed to submit with Grants.gov, even if there are other systems? Should the grants community not be consulted?**
  - The interest is in ensuring that Grants.gov, as a tool, is available for use on an ongoing basis as well as for Recovery Act purposes, which have greatly ramped up the use of that particular application. We need to ensure that Grants.gov is operating at a certain level because it is a government-wide resource. The grants community is continually being consulted on the functionality and upgrades to Grants.gov. Webcasts, such as this one, are conducted by the Grants.gov program management office (PMO) on the functionality of the site and other issues. These Webcasts allow Grants.gov to receive feedback from users. The focus of the memos issued by OMB was to ensure that Grants.gov is able to maintain a certain level of service and functionality. Grants.gov was not designed to be an open-ended opportunity for agencies to use any application they want. We need to alleviate some of the burden that has landed on the site since the implementation of the Recovery Act to keep the site operational.
  - The reason other sites have been proposed for universities and other users is to create some redundancy for Grants.gov since the site is under such strain. The idea was to create a secondary portal for applicants to submit their grant application by the deadline, if they are unable to access Grants.gov and to ensure that the grants process does not stop. This secondary, optional portal is temporary while the Grants.gov site is upgraded.
- **What limitations are in place regarding indirect costs/overhead amounts when applying for one of the NIH Grand Challenge Grants?**
  - There is no change to established policy in the provision of funds to support Facilities and Administrative (F&A 'indirect') costs on NIH ARRA awards. Unless F&A costs are restrictive by the mechanism (examples: 8% for Training, Educational, Career and Foreign Awards and 0% F&A for Federal applicants or conference grants), F&A costs will be authorized using the current negotiated rates for the applicant institution at the time of award.
- **Why does there need to be waste in management by having different data elements and processes for reporting Federal Funding and Accountability Act (FATA) sub-recipient data and American Recovery and Reinvestment Act (ARRA) sub-recipient data? Why can not all these data elements go into one system? When will there be a pilot for testing the sub-recipient data system, or will it just be imposed on users with no testing?**
  - Fundamentally, there are two different laws with different sets of data standards. Each piece of legislation called for its own system and each of the elements within the laws must be complied with to provide transparency.

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- At this point, no final decision has been made on how ARRA recipient reporting will happen and what that system will look like; the requirements for an ARRA system have not been developed. Although there are slightly different requirements for each of these laws a bridge between these two systems is being discussed. The extent to which the two systems could potentially overlap and potential ways to merge processes is being explored.
- OMB intends to utilize a similar model to the FFATA process when rolling out the ARRA reporting system in which they will solicit volunteers to test the site for functionality.

In general, a trend is emerging in government: building systems in response to Congressional requests. These requests must be responded to quickly, which results in a new system that may duplicate the functions of another agency's site. A single reporting system is wholly possible, but it will have to be able to be modified frequently and allow for the adding of data elements as new Congressional requirements come down. A system of such a caliber will take time and effort.

- **What is the status of the FFATA sub-recipient pilot?**
  - The FFATA sub-recipient pilot has been put on hold due to the focus being placed on the Recovery Act government-wide.
- **Why do all federal research agencies not use Research.gov? Also, if this is a best practice, what is being done to help with implementation of the Federal Financial Report (FFR) on other systems beyond Research.gov?**
  - If you look at the history of Research.gov, when OMB put out a Request of Information (RFI), it became clear that there was not a single solution. At this point, a consortium model was adopted and three consortia were created each having a lead agency and partners. NSF was selected to lead the research focused consortia. Last year we signed up a number of different agencies and there are more in the pipeline. Those agencies aligned with NSF use Research.gov as a grant-making tool. Research.gov was never intended to have the capacity or the capability to service the multitude of grant-making agencies in the U.S. government. In addition, many agencies had already put a significant amount of dollars into their own systems and could not be abandoned.
- **Marguerite: you mentioned you were looking at ways to streamline the award process for grants. Can you give an example of how this would work? What would be done to speed the award process while meeting the competition requirements of the Recovery Act? On the oversight end, what steps are you taking to ensure that information is reported to Recovery.gov in a timely manner and in a way that's easily understood by the public?**
  - Although OMB is in Recovery Act mode, we want to make sure that we continue to look for ways to streamline because a lot of legislation is coming down from Congress with very specific requirements on expediting processes and ensuring that funds are obligated in a quick manner. Due to OMB's competing priorities, the question of streamlining processes has been put to the GPC. The GPC has been engaged to find

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a way to balance priorities and make the process run more smoothly for everyone.

- OMB is transferring a lot of responsibilities to the newly created Recovery Transparency and Accountability Board, which will have major involvement in looking at everything related to the Recovery Act and monitoring compliance with the Recovery Act.

If you put some more time and effort on the front end, you can save some time and effort on the back end. Streamlining any grants process involves not only the people with the hands on, but also the community. Agencies have missions and it is through the grant process that that mission is carried out. NSF is one example of streamlining grants processes. NSF has been very fortunate that OMB has allowed it to be innovative, given it Research.gov, and made it a consortium lead. NSF tries to work to provide innovative solutions.

- NSF has been able to cut out a step in the award process. The proposal contains the terms and conditions. When an award decision has been made, the system automatically loads the terms and conditions from the proposal into the e-mail award letter. This allows NSF to create a routine for standard awards. For NSF, this means that 50 to 70 percent of its award actions go out at the press of a button. Another benefit to this process is that it provides front and backend notification of the terms and condition, making the process transparent.

- **At one point, the GPC and one of the agency working groups were working on common terms and conditions that could be used to replace A110 and A102. What is the status of that effort?**

- This is an ongoing effort. This is being done through the Pre-Award Work Group. Due to the frequency of new legislation, the effort has been continually delayed.

- **What involvement does GPC have with the implementation of the Recovery Act?**

- Several key members have been asked to comment on various pieces. Occasionally, OMB and the GPC have convened to discuss the direction of the Recovery Act and what potential barriers the direction could pose. The GPC is a very deliberate, deliberative body. It has to get all 26 agencies on board. With the Recovery Act, GPC has been in a very reactive mode since the Act has happened so quickly. Many of the individual members of the GPC have been engaged as were many people in state governments.

- **Are there any updates for the state of the Research Performance Progress Report (RPPR)?**

- The RPPR's ownership lies with the National Science and Technology Council's Committee on Science's Sub Committee on Research Business Models. The RPPR has gone through parallel processes with the GPC and the Committee on Science. The GPC is happy with the current content and form for the RPPR. The Committee of Science has not approved the RPPR. Once the Committee does approve the RPPR, it will

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be formally remanded to the GPC and then formally remanded to OMB for their review and clearance.

- **Has it been considered that whistleblower provisions should be added to the 2 CFR Part 176 Terms and Conditions?**
  - These terms and conditions were to implement Sections 1512 (reporting requirements), 1605 (buy American requirements), and 1606 (wage requirements) of the ARRA. The guidance OMB issued in their April 3, 2009 memo was meant to be the guidance for what terms and conditions to use. As a need for terms and conditions in other areas arises, OMB will work to provide additional guidance. OMB would like to hear from agencies if there is a need for further interpretation of guidance issued around ARRA.
- **Has there been input from the President's Council on Integrity and Efficiency regarding whistleblower provisions (2 CFR Part 176)?**
  - OMB has not heard anything on the grants side. The Inspector Generals are concerned, but no other information has been issued.
  - OMB will follow up on this question, if there was any additional activity with respect to grants.
- **When a reporting solution is implemented for Recovery Act reporting, will all agencies be expected to follow the same guidelines or will agencies be able to implement the requirements independent of one another? When is it expected that the reporting solution will be implemented?**
  - No, agencies will not be able to implement the requirements independent of one another.
  - A reporting solution is in the works with Chief Data Architect and the Recovery.gov PMO. There is no defined date or deadline. The goal is to have something before the first report is due to be submitted. Delaying the first report submission is being considered. Recipients would still have to complete the first report, but its submission would be delayed until the October 10 submission date. This means two submissions would be made on October 10.
- **When can we expect to see final Recovery Act Terms and Conditions for our awards from OMB?**
  - April 23<sup>rd</sup> is when the interim-final will be registered in the Federal Register. The release of the final Recovery Act Terms and Conditions depends on the feedback on the interim-final.
- **Research.gov is one system picked by OMB as a Grants Management Line of Business (GMLOB). The NIH eRA Commons is another one as well as the one from Department of Education and DOE's FedConnect. Currently, there seems to be a half dozen for grants management. Will OMB pick just one in the future? How can they make other agencies join in? Will NIH really drop its excellent eRA Commons in favor of using Grants.gov?**
  - Research.gov has a menu of services that agencies can pick and choose the things that best fit their current set of grants management tools. NIH

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would not quit their current system, but would collaborate on research spending and results as well as tools that are not yet developed in either system. It is very difficult to go from hundreds of systems to one that will meet everyone's needs in a short timeframe due to the legislation that has created the systems that currently exist and the requirements those pieces of legislation impose. A single grants management system should be a goal, but it will take time. The number of payment systems has successfully been consolidated into less than eight and work is still being done to reduce the systems even further.