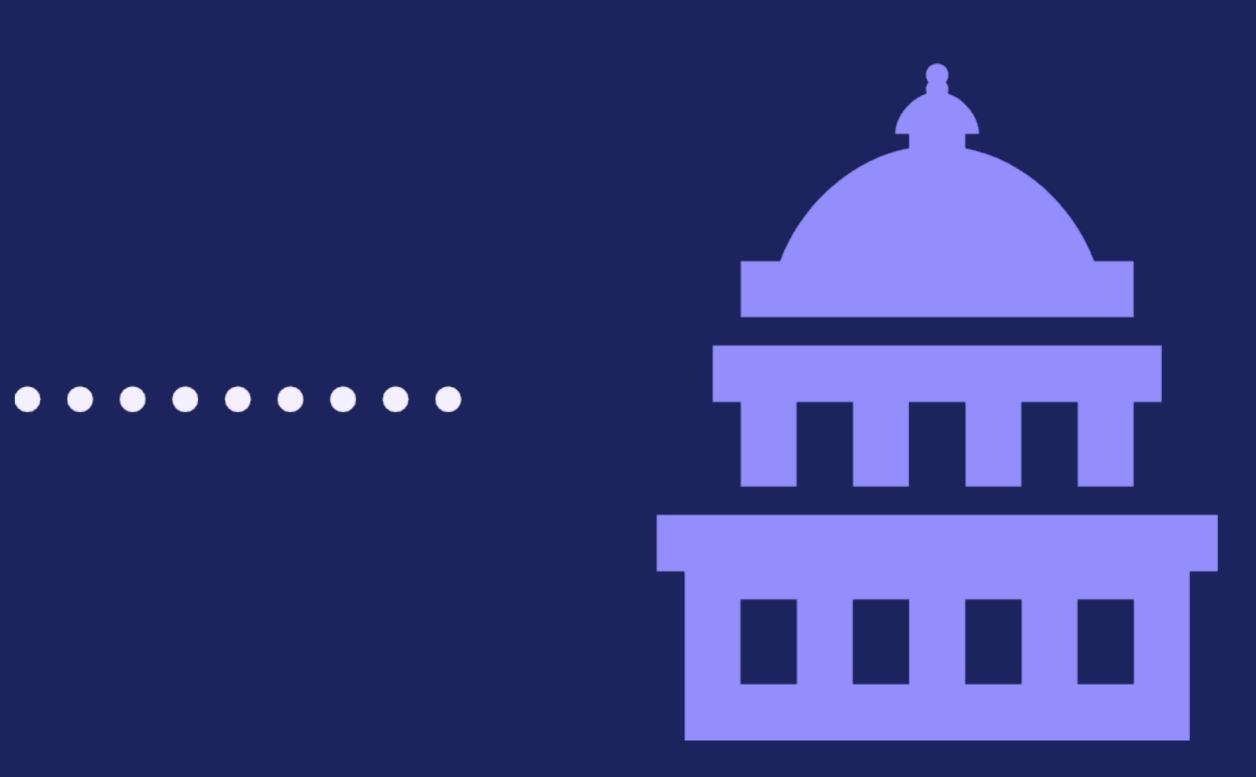
Post Award Compliance and Monitoring Environment at NSF







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Resolution and Advanced Monitoring Branch
Division of Institution & Award Support
National Science Foundation



What we are covering today...

OUR AGENDA:

- Post-Award Monitoring Activities
- RAM Resolution Process
- Single Audits
- RAM-OIG Collaboration
- Case Study
- COVID-19 Updates



Post Award Monitoring Activities





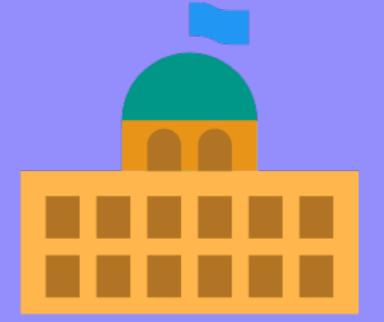
- Required
- Standardized

RAM Activities



- Site Visits
- Desk Reviews
- Post-Award Adjustment Requests

Other Activities



- Business Strategic Reviews
- Improper Payment Testing
- Programmatic Progress Monitoring
- Large Facility Audits
- Indirect Cost Rate Negotiation

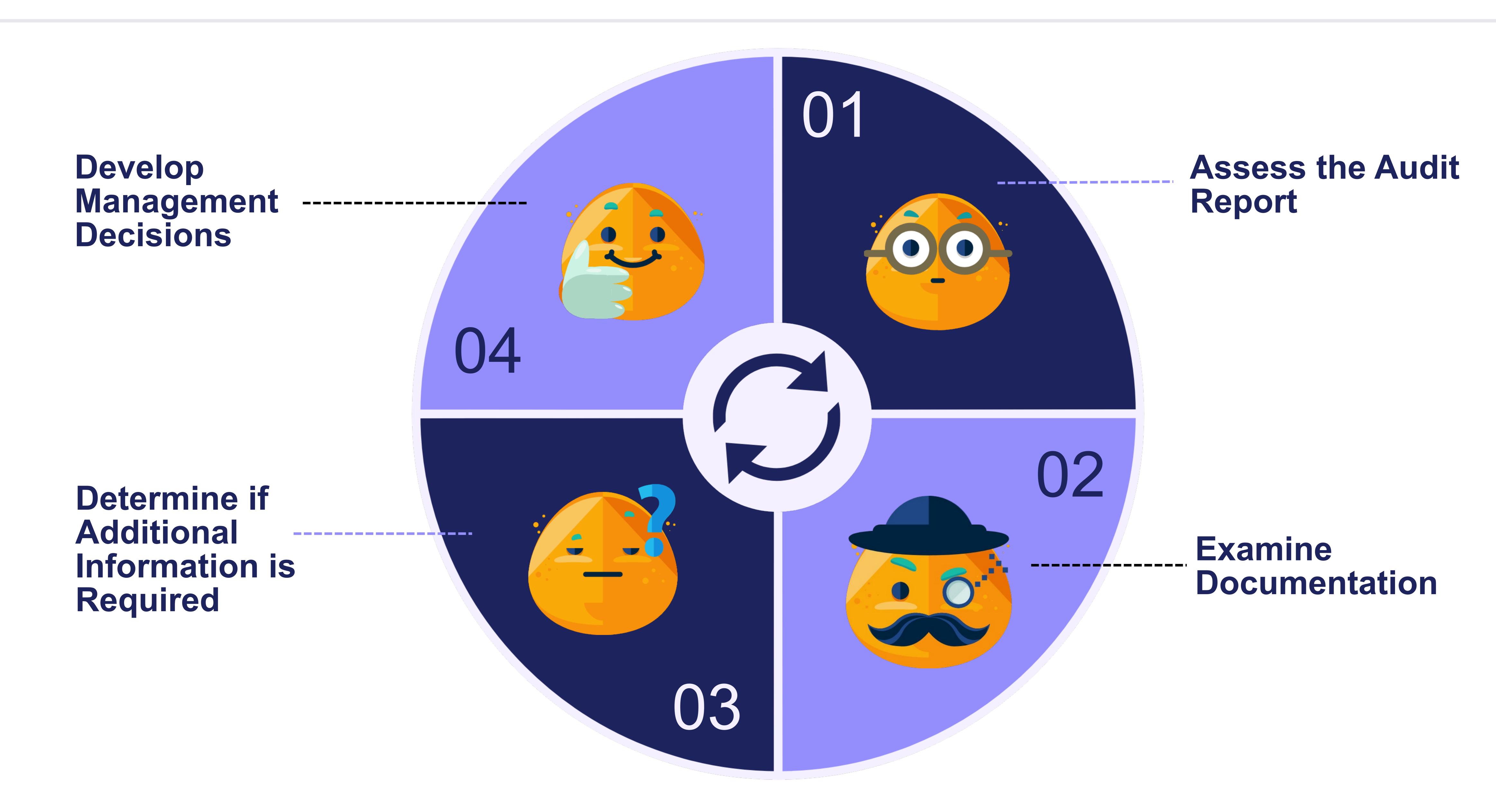
Inspector General Audits



- Required
- Varying scopes and objectives
- Internal and External to NSF
- Independent



RAM Resolution Process





Single Audits



Risk Assessment/Triage

- Leverages proactive work/CAP by awardees
- •Efficient use of Agency Resources



Agency Collaboration

- •Government-wide risk model
- Joint resolution



Compliance Requirements

- Scope of audit
- Decrease from 12 to 8



Decrease Burden

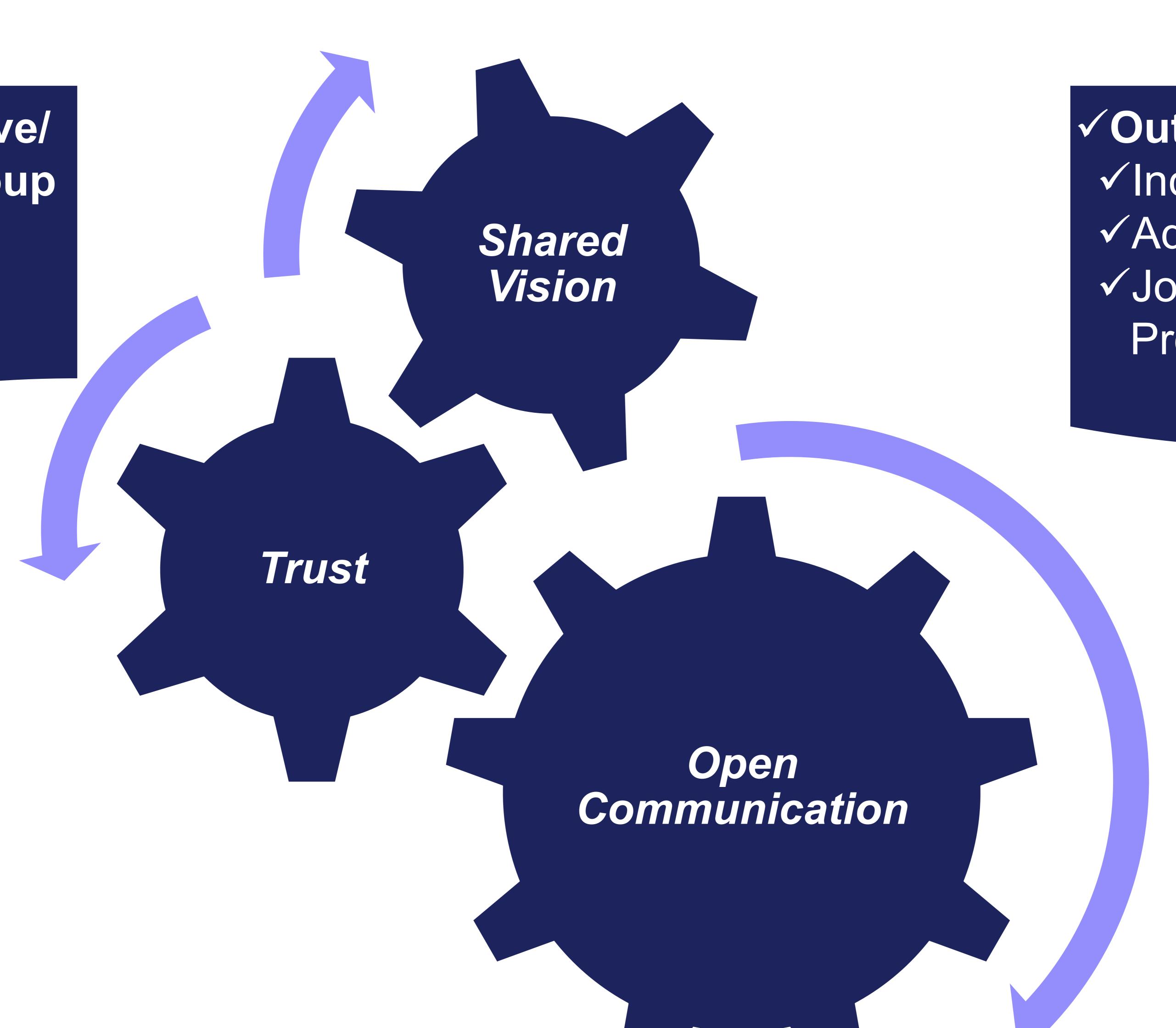
- •Minimize duplicate RFIs
- •Focus efforts on risk to Government



Evolution of NSF OIG-Relationship



- ✓ Communication
- ✓ Collaboration
- √Respect



√Outcome

- ✓ Increase Flexibility
- ✓ Advanced Coordination
- ✓ Joint Focus on Improved Program Performance



Benefits to the Recipient Community

Improved
Audit
Experiences

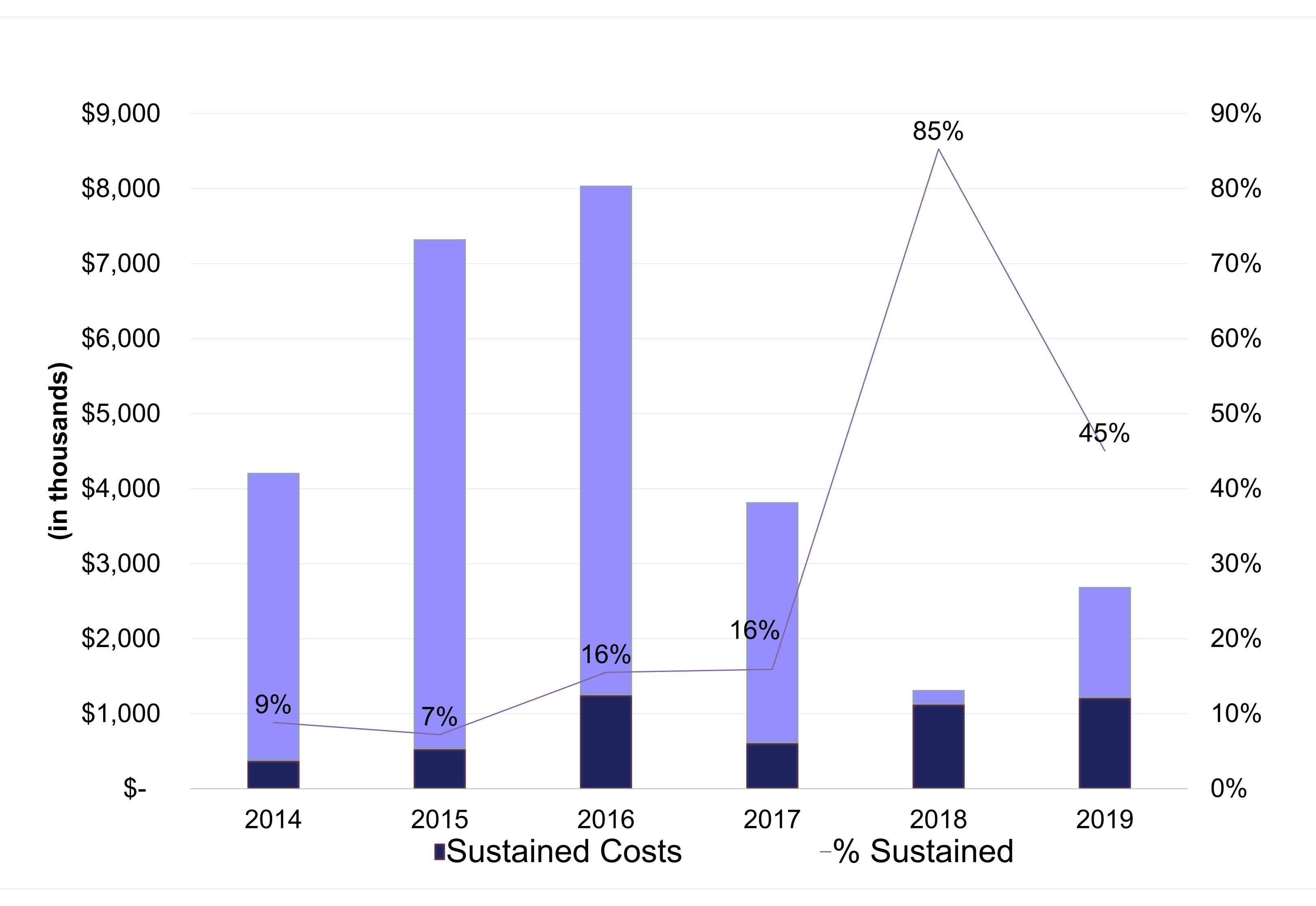
Less
Duplication of
Effort During
Audit
Resolution

Greater
Accuracy in
Findings and
Questioned
Costs

Enhanced
Clarity in NSF
Guidance

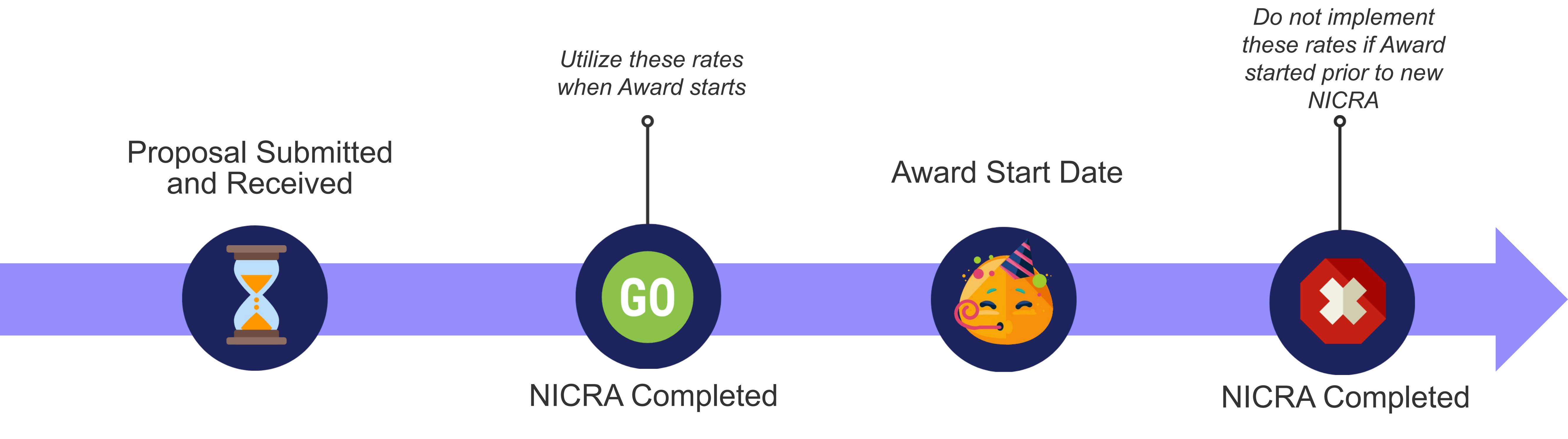


NSF-OIG Relationship: Encouraging Results



| FY | Number of OIG Escalations |
|------|------------------------------|
| 2010 | 1 |
| 2011 | 2 |
| 2012 | 4 |
| 2013 | 2 |
| 2014 | 2 |
| 2015 | 3 |
| 2016 | 0 |
| 2017 | 0 |
| 2018 | |
| 2019 | 0 |

Case Study: Negotiated Indirect Cost Rate Agreements

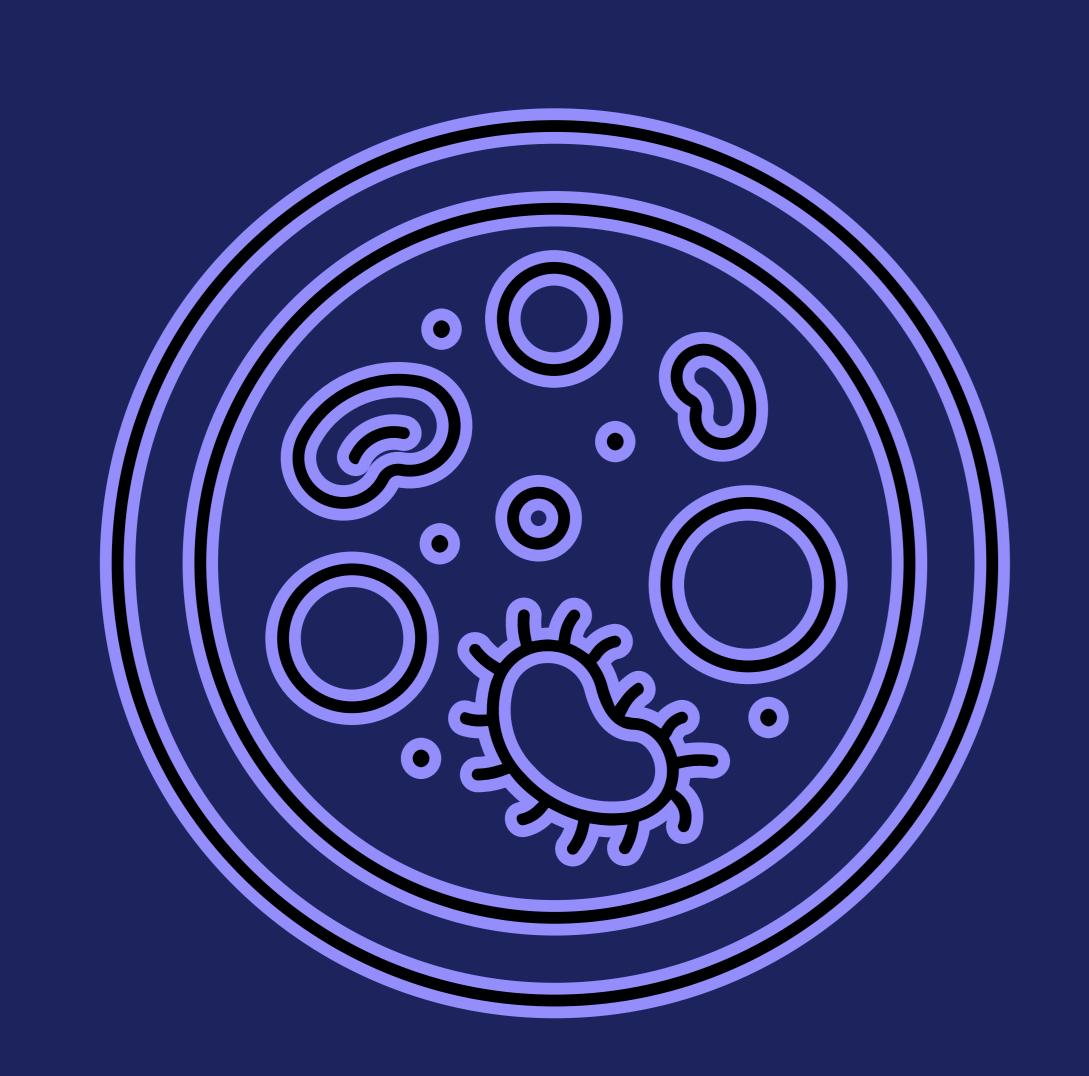


Exceptions:

- Non-profits
- State & Local Governments
- Tribal Organizations



RAM COVID-19 Response

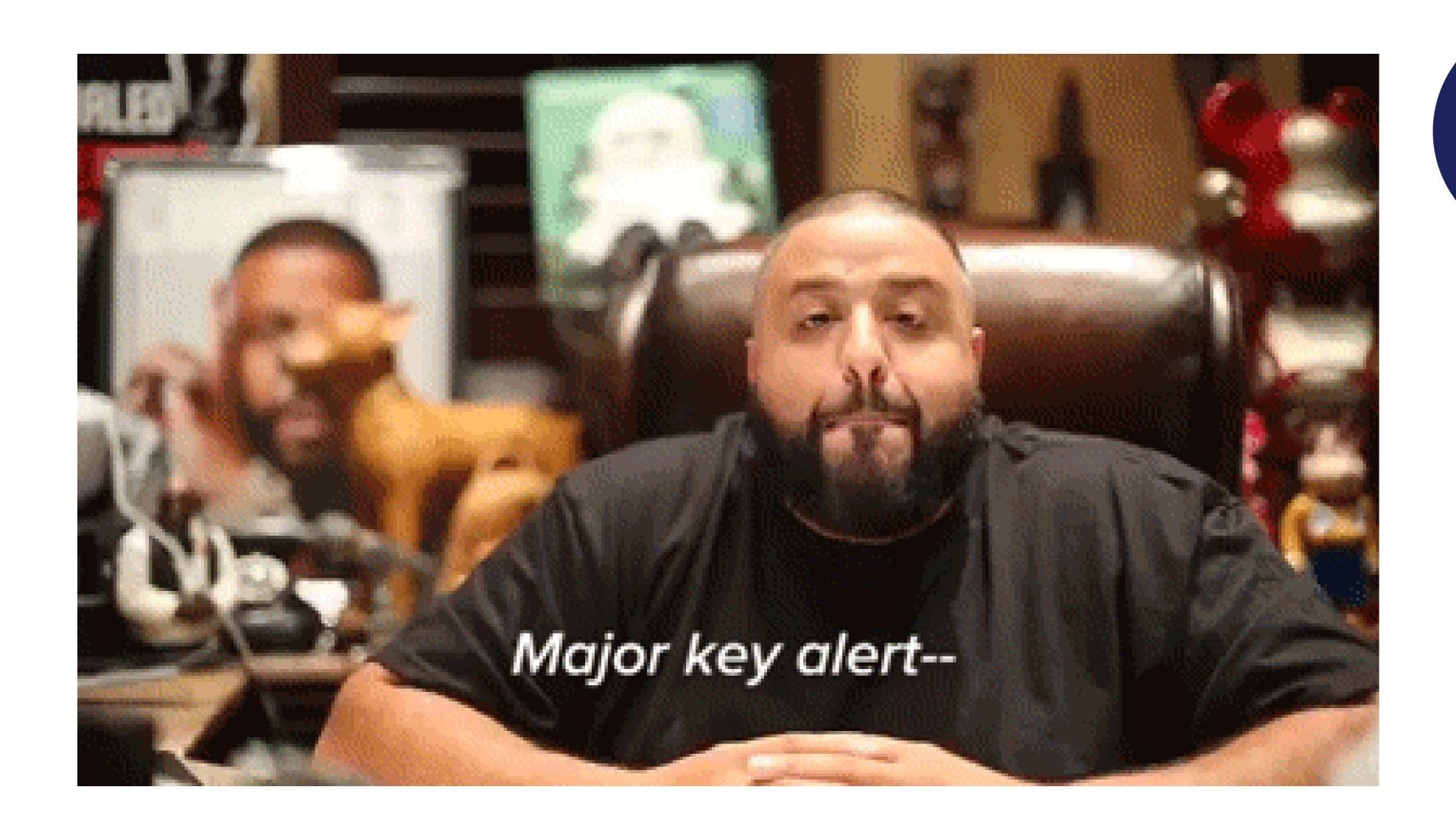


- FY21 Site Visits
 - * Awardees Selected
 - * Dates being determined
 - * Non-critical travel restricted
- > Awardees extended flexibilities for submitting supporting documentation
- > Assessing necessity of advanced monitoring activity for CARES ACT funding
- https://www.nsf.gov/news/special reports/coronavirus/



Keys to Success for Awardees

Maintain strong internal controls in writing...and adhere to them!



Keep a watchful eye on expenditures (e.g., reasonableness, necessity, etc.)

Understand award requirements and expectations (terms and conditions, NSF policy, OMB Guidance)

Get prior approvals when required (see RTC Appendix A, Prior Approval Matrix)

Maintain adequate supporting documentation for all charges made to federal awards

Ask Early, Ask Often!



Questions, Comments, & Concerns

questions, comments, a concerns

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