ARRA Acceleration Frequently Asked Questions (FAQ) for NSF Principal Investigators with awards funded under the American Recovery and Reinvestment Act of 2009 (ARRA)

Updated February 13, 2013

1. Does OMB's Memo requiring acceleration of ARRA expenditures apply to my NSF ARRA award?

Yes. If you are a Principal Investigator (PI) or co-PI with an active NSF ARRA award, Office of Management and Budget (OMB) Memo M-11-34 applies to your award.

2. What should I do now with my ARRA-funded project?

You should be **responsibly** accelerating expenditures and acting in accordance with the e-mail notification that was sent to you and your Authorized Organizational Representative on September 20, 2012. This e-mail notification identified whether or not your award was on the waiver list submitted to OMB and provided important information on how to proceed. See #4, #5, or #6 below for further information.

You must remember that, in accordance with the terms and conditions of the award, all expenditures must be allowable pursuant to the applicable cost principles and that requested payments must be necessary to meet current needs.

You should also be coordinating with your sponsored projects office or authorized representative to ensure that any plans to accelerate expenditures are also consistent with your organization's policies.

3. What do you mean by responsible acceleration?

In order to determine the appropriateness of accelerating any particular expenditure under your ARRA-funded award, you must consider your program plan, the terms and conditions of your award, and the facts and circumstances of your situation. You must be sure to communicate your proposed acceleration strategy with your sponsored project office because if expenditures are later determined to be unallowable, then your institution will be held responsible for such costs. You can also contact your NSF program officer about the programmatic feasibility of your proposed strategy.

4. I received notification that my award will be included in NSF's waiver request package to OMB. How should I proceed?

For ARRA awards included in NSF's agency waiver package, the Foundation is prepared to stand by its determination that there is a compelling legal, policy, or operational rationale for allowing expenditures to continue beyond September 30, 2013. Pls should proceed with work in

accordance with the terms and conditions of the award while continuing to responsibly accelerate when possible.

5. I am a PI for a CAREER award. What should I do?

Recognizing that the entire portfolio of ARRA-funded CAREER awards were issued as five-year awards, which do not expire until 2014, NSF submitted a programmatic waiver request to OMB to cover all CAREER PIs. Similar to other awards that were included in its agency waiver package, for CAREER awards, NSF is prepared to stand by its determination that there is a compelling legal, policy, or operational rationale for allowing expenditures to continue beyond September 30, 2013. PIs should proceed with work in accordance with the terms and conditions of the award while continuing to responsibly accelerate when possible.

6. I received notification that my award will not be included in NSF's waiver request package to OMB. What happens now?

a) For projects that are set to expire on or before September 30, 2013:

The award may not be extended beyond September 30, 2013. Project staff should proceed with work in accordance with the terms and conditions of the award while continuing to responsibly accelerate expenditures whenever possible. All expenditures must be allowable pursuant to the applicable cost principles, and all requested payments must be necessary to meet current needs.

b) For projects set to expire past September 30, 2013:

NSF will amend your award to modify the expiration so that your project cannot continue past September 30, 2013. Principal Investigators should work with NSF Program Officers as needed and proceed with an adjusted accelerated plan to reflect the revised award expiration date of September 30, 2013. Project expenditures must still fall within the terms and conditions of the award. All expenditures must be allowable pursuant to the applicable cost principles, and all requested payments must be necessary to meet current needs. All project expenditures must be completed by September 30, 2013. No extensions will be granted.

7. What if I expend funds on my award near the deadline of September 30, 2013, but they are not billed to NSF until afterwards?

As long as the cost is properly expended on the award by September 30, 2013, it will be considered timely. All expenditures on your award must be reported to NSF within 30 days after the end of the guarter September 30, 2013.