

Important Information Regarding ARRA Awards

On September 15, 2011, the Office of Management and Budget (OMB) issued Memorandum M-11-34, "Accelerating Spending of Remaining Funds from the American Recovery and Reinvestment Act." The memo directed Federal agencies to accelerate the spending of ARRA funds as a way to support the President's ongoing efforts to "drive the economy forward and create jobs" and to take steps to complete Recovery Act projects by September 30, 2013.

Agency-specific guidance

The National Institutes for Health (NIH) and the National Science Foundation (NSF) have provided guidance on meeting the accelerated spending goal. The key elements of that guidance follow. The NIH guidance can be found at:

<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-014.html>. The NSF guidance can be at:

<http://www.nsf.gov/recovery/acceleration.pdf>.

NIH Guidance:

For awards scheduled to end on or BEFORE September 30, 2013

If a no-cost extension is necessary, it must be requested by JUNE 1, 2012, regardless of the end date of the award. Grantees may still exercise their one-time, grantee-approved no-cost extension as long as the period of performance with the extension does not extend beyond September 30, 2013. However, if a Principal Investigator requires an extension beyond September 30, 2013, he/she must follow the guidance below for "awards that are scheduled to end after September 30, 2013."

For awards that are scheduled to end AFTER September 30, 2013

If a no-cost extension is necessary, it must be requested by June 2, 2012. The NIH Grants Management Officer for the award must be notified in writing via the appropriate Contract and Grant Officer in Sponsored Projects of the request for an extension. The request for extension must explain why an extension of the project is vital for its completion. NIH must seek a waiver from OMB in order to approve the extension. The criterion for a waiver is as follows:

- The project is long-term by design and acceleration would compromise core programmatic goals;
- The project must undergo complex environmental review that cannot be completed within this timeframe;
- Contractual commitments between the awardee and vendors/subrecipients legally prevent adjusting the timeline for spending;
- Special circumstances exist where acceleration may cause unnecessary harm or unreasonable risk to vertebrate animals or human subjects involved in the research (such as in ongoing clinical trials).

The Standard Terms and Conditions for the award will be revised to require sponsor approval to extend the award. NIH strongly encourages grantees to responsibly accelerate spending.

NSF Guidance:

For awards scheduled to end on or BEFORE September 30, 2013

If a no-cost extension is necessary, it must be requested by June 2, 2012, regardless of the end date of the award. Grantees may still exercise their one-time, grantee-approved no-cost extension as long as the period of performance with the extension does not extend beyond September 30, 2013. However, if a Principal Investigator requires an extension beyond September 30, 2013, he/she must seek a waiver in accordance with the guidance below for “awards that are scheduled to end after September 30, 2013.”

For awards that are scheduled to end AFTER September 30, 2013

Principal Investigators must contact their NSF Program Officer in writing, with a copy of the Contract and Grant Officer in Sponsored Projects, no later than March 2, 2012 and provide either 1) a plan to accelerate completion of the project or 2) to request that a waiver be sought for completion of the project as originally planned. The criterion for a waiver is as follows:

- The project is long-term by design and acceleration would compromise core programmatic goals;
- The project must undergo complex environmental review that cannot be completed within this timeframe;
- Contractual commitments between the awardee and vendors/subrecipients legally prevent adjusting the timeline for spending;
- Special circumstances exist where acceleration may cause unnecessary harm or unreasonable risk to vertebrate animals or human subjects involved in the research (such as in ongoing clinical trials).

NSF will review all submitted requests and determine whether they will be included in the NSF’s waiver request to OMB.

Principal Investigators that have ARRA funded Career awards are not required to provide a plan for accelerated spending or a request a waiver. NSF will request a waiver for those awards.

NSF will amend awards to ensure that the period of performance does not extend beyond September 30, 2013 in order to comply with the OMB memorandum.

Sponsored Projects strongly encourages Principal Investigators to responsibly accelerate spending on their ARRA awards to the greatest extent possible because waivers are not guaranteed. While this guidance applies to NSF and NIH awards, all federal agencies have been directed to provide guidance. Guidance from other federal agencies will be disseminated, via this listserv and the Sponsored Projects website, when it is received.

If you should have any questions, please contact your Contract and Grant Officer.

http://apps.research.uci.edu/orastaff/staff.cfm?view_department=spda