

CLARK ATLANTA UNIVERSITY

11.3 – Principal Investigator’s Handbook



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HANDBOOK	Subject: 11.3 – Principal Investigator’s Handbook	
Department: Division of Research and Sponsored Programs	Review Date: 16 Feb 2010	Issued By: Marcus W. Shute, P.E., Ph.D.
	Effective Date: 25 Feb 2010	
	Modified Date: N/A	
Distribution: University-wide Community	Reviewed By: CAU Compliance Committee	No. of Pages: 49

THE PRINCIPAL INVESTIGATOR'S HANDBOOK

Division of Research and Sponsored Programs Clark Atlanta University

100.00 INTRODUCTION

Clark Atlanta University (CAU) receives awards for research, training, and technical assistance from extramural funding sources, including the federal, state and local governments and private organizations. Policies and procedures governing research and sponsored programs are diverse and complex. This Handbook seeks to guide administrators, faculty and staff from the development of a research idea to the administration of an award. In addition to answering the most common questions, the Handbook provides information on Federal regulations and policies, certifications and assurances, and intellectual property including patents and copyrights. The Handbook also deals with compliance policies on OMB Circulars [A-21](#), [A-110](#), and [A-133](#) as well as the protection from research risks involving human subjects, animal care and use, radiation safety, hazardous materials, and controlled substances. Principal investigators (PI) are required to review the [OMB Circulars](#) as well as the [Policies and Procedures for Government Sponsored Programs](#) found on the [CAU Compliance Office website](#) for more in-depth discussion and details on various aspects of grants administration and policies related to sponsored program activities. In addition, the CAU Compliance Office has established a [compliance hotline](#) (404.589.8006) to facilitate anonymous reporting of fraud, improper use of property or records, conflict of interest, and other violations of CAU policies as well as OMB circulars and other federal regulations.

200.00 DIVISION OF RESEARCH AND SPONSORED PROGRAMS

RSP provides leadership, information, technical assistance, and a myriad of services to encourage faculty and staff to engage in research and training programs through extramural funding sources. One of the major goals of RSP is to increase CAU's research capacity while strengthening the academic programs and infrastructure. The University displays a broad spectrum of sponsored programs including, basic research, applied research, training, and faculty and student development. The programs range from individual projects to major research collaboratives. RSP serves as a liaison between funding agencies, PI / project directors (PD), and the administrative units of the University. Some of the functions of RSP are as follows:

- locate potential funding sources;
- coordinate compliance policies on human subjects, animal care and use, research standards of conduct and integrity, and biosafety with federal, state, and local regulations;
- guide faculty and staff through the grant/contract application process;
- route proposals through channels for approvals and endorsements;
- maintain University award files and records;
- establish research partnerships, collaboratives, and cooperative agreements;

- conduct workshops and seminars on grant writing and administration;
- negotiate and manage intellectual property (IP) rights which include patents, copyrights, and publication agreements;
- administer and manage research grants, contracts, and cooperative agreements;
- disseminate information via [RSP website](#) on availability and deadlines for external funding opportunities in research;
- manage technology transfer, commercialization, and licensing of University's IP, and
- review proposals for research and fiscal compliance, which includes budget review and negotiation of Facilities and Administration (F&A), formerly known as indirect costs (IDC).

205.00 THE ORGANIZATION OF THE DIVISION OF RESEARCH AND SPONSORED PROGRAMS

RSP consists of the vice president, director of research and sponsored programs, preaward personnel, postaward personnel, senior staff assistant, various research centers, and other research faculty/scientists. RSP works closely with Finance and Business Services in the administration of grants, contracts, and cooperative agreements through purchasing agents and grants analysts. The RSP staff directory and organizational chart can be found on the [RSP website](#).

210.00 RESEARCH AND SPONSORED PROGRAMS STAFF

210.05 Vice President

The Vice President for Research and Sponsored Programs (VPRSP) is the University officer responsible for developing and implementing the vision, direction and guidance of the University's research enterprise, policy formulation, and oversight related to the research process and education/training. The VPRSP promotes the creation of a university environment that strongly encourages and supports faculty to move towards the forefront of knowledge as educators and on the leading edge of research as investigators. The VPRSP is also responsible for patents, copyrights and technology transfer arising from inventions and discoveries by the faculty, research associates and adjunct professors of the University. All research centers and institutes report to the VPRSP who reports directly to the President of the University.

210.10 Director, Research and Sponsored Programs

The Director of RSP develops procedures for implementing the policies set forth by the VPRSP and is responsible for supervising the day-to-day office operations and staff including the operating budget. The Director reviews proposal content and budgets, converses with various federal agencies on program announcements, active grants, contracts and cooperative agreements. S/he provides oversight of research budgets, requests and negotiation of F&A cost rate reductions or waivers, negotiation of matching funds (in-kind or cash) with Finance and Business Services, management of sponsored accounts, including federal related accounts as well as identifies funding sources to underwrite the University's research objectives.

210.15 Preaward Staff

The preaward staff assists in identifying funding opportunities; proposal development; maintaining a research records management system; preaward and postaward data collection; monitoring of equipment purchased through federal grants for the equipment inventory process with the Office of General Accounting; and supports the research compliance effort in RSP. The preaward staff also assists in program development to facilitate new research initiatives and assist with the maintenance of an electronic database for tracking pending proposals and funded projects. The preaward staff works closely with faculty in developing the statement of work, generating a cost proposal, assisting with negotiating the terms and conditions of the contract, payment method and all other aspects of contract preparation.

210.20 Postaward Staff

The postaward staff serves as the primary interface between the University and funding agencies as well as PIs and the OGCA function at the University. Post award personnel also oversee university research compliance committees on biohazards, human subjects, animal care and use; and serves as a liaison between funding agencies and University staff. In addition, postaward staff work closely with the PI by assisting them with the interpretation of award documents, in setting up accounts, monitoring the rate of spending, recycling of funds, and tracking reporting activity, account close-out, etc. Other responsibilities include preparing financial data for RSP reports and supervising the proper handling of documents that route through the division such as PAF forms, student stipends/work wages/tuition forms, stipend/award forms for faculty and staff, and requisitions, etc. In addition, the preaward staff may assist with proper management and administration of all contracts throughout the duration of the projects by providing assistance with renewals, no-cost extensions, modifications and other contract management issues.

210.25 Administrative Staff

The administrative staff performs administrative and secretarial functions for the division including coordinating the routing of proposals, awards and other incoming documents for the division. The administrative staff is responsible for coordinating the daily schedule of the entire office. The administrative staff performs a variety of complex and confidential administrative duties requiring a thorough knowledge of organizational procedures and precedent. The administrative staff also assists in monitoring the internal financial control of the area budget(s) and adherence to university policies and guidelines. Additional responsibilities include processing reports, preparing documents, and coordinating meetings and other area activities.

215.00 RESEARCH COMMITTEES

Research at Clark Atlanta University has become an important part of the overall mission, goals, and objectives of the University. To ensure that research operations are efficient and in compliance with Federal, state, and local regulations, several research compliance committees were established to advise Research and Sponsored Programs on its research and sponsored program activities. The Biosafety Committee, Radiation Safety Sub-Committee, Research Integrity Committee, Human Subjects Committee, and Animal Care and Use Committee approve all research involving hazardous materials, human subjects, and experimental animals as well as manage research integrity issues. See section 500 for a detailed description of the roles and responsibilities of the remaining research compliance committees. The

Research Advisory Council advises the VPRSP on various issues related to the research enterprise at the University.

215.05 RESEARCH ADVISORY COUNCIL

The purpose of the Research Advisory Council is to assist RSP and the University in developing realistic goals, strategic direction, and new research initiatives. The Council also reviews policies and procedures, and makes appropriate recommendations.

The members of the Research Advisory Council are appointed by the VPRSP and may include the deans or their designee from various schools, the directors of the research centers, VPRSP, selected members of the RSP staff, representatives from the Division of Finance and Business Services, selected PIs, representatives from industry, government agencies, and other universities.

300.00 FUNDING SOURCES

The University receives funding for research and sponsored programs from Federal agencies, corporations, small businesses, and private foundations. RSP will assist potential PIs in the earliest stages of the proposal by identifying potential sponsors for the project. The PI may access an enormous amount of information from Grants.gov website as well as [RSP website](#). RSP maintains webpage addresses, links to reference books, application kits, reports, electronic databases, guidelines, directories, and newsletters from federal, state, local and private agencies for PI information and use.

400.00 PROPOSAL DEVELOPMENT

All academic grants, contracts, and cooperative agreements are managed by the Division of Research and Sponsored Programs. The elements of a proposal generally include cover sheet, certification pages, table of contents, project summary or abstract, project description evaluation, biographical sketches, references, budget and budget justification, and appendices. The project description should clearly define the purpose, significance, objectives, methods, evaluation plan, and anticipated outcomes. PIs are encouraged to review and consult proposal guidelines from the funding agency for each proposal.

405.00 QUALIFICATIONS OF A PI/PD

Before a PI writes a competitive research proposal or a demonstration project for extramural funding, it is critical that the PI have a well-conceived idea that falls within his or her area of expertise. Competency in an area of expertise must be supported by the PI's level of education, relevant experience, familiarity of the literature in the area of interest, and peer-reviewed publications and presentations. The PI should have an excellent research reputation in order to be seriously considered by external review panelists. It must be clear that the proposed PI has the ability and capacity to implement the proposed research project or activity. Some important components of qualified PIs/PDs are listed below:

- Earned degrees, dates, and institutions(s)
- Grants, contracts and cooperative agreements received

- Employment status at the University
- Recent refereed publications with relevance to proposed project
- Refereed presentations
- Research interests and teaching experience

410.00 PROPOSAL CONTENT

For the most part, each sponsor or funding agency will define specific requirements and guidelines for proposal components and content. In general, a proposal, based on a well-conceived idea, implementation plan and current knowledge in the field, will assume the following format:

- Cover Sheet
- Certification Pages (usually federal)
- Table of Contents
- Project Summary/Abstract
- Project Description Evaluation
- Biographical Sketches
- References
- Budget and Budget Justification
- Appendices

The PI or PD should use a checklist that is relevant to the proposal.

410.05 Cover Sheet

Each federal or private sponsor usually provides its own cover sheet. Cover sheets normally consist of information about the applying institution such as its name, PIs name, funds requested, project duration, name of institutional representative, address, telephone, fax, e-mail, name of the project, and signatories. Only the President or the VPRSP (or designee) may sign as the authorized representative of the University on the cover sheet. The proposal preparation fact sheet provides much of the information requested about the University on agency coversheets and can be found on the [RSP website](#).

410.10 Certification Pages

Federal agencies require that all PIs and Co-PIs certify by checking appropriate boxes on drug free workplace, lobbying activities, and debt/debarment and suspension by signing specific certification forms. The institutional representative must certify that statements contained in the proposal are true and complete to the best of his or her knowledge, and that the institution agrees to accept the obligation to comply with award terms and conditions. It is further required that the institutional representative certify that the University has implemented and is enforcing a policy on conflicts of interest. Only the President or the VPRSP (or designee) may sign as authorized representatives of the University.

410.15 Table of Contents

Typically proposals should contain a useful table of contents. It should point to each major topic in the proposal as well as important minor topics.

410.20 Project Summary or Abstract

The proposal must contain a project summary or an abstract that is usually one page. The project summary describes the proposed activity written in the third person and suitable for publication. The project summary should not be an abstract of the proposal, but rather a self-contained summary of the activities to be undertaken. It should contain project objectives, methods to be employed, anticipated outcomes and the significance of the proposed activity. The project summary is usually written for a broad audience. Abstracts may be used instead of a project summary when appropriate and required by sponsoring agencies. The abstract should stand alone as a complete description of the proposed project.

410.25 Project Description

The main body of the proposal should be a clear statement of the work to be undertaken. It should include the following:

- Objectives for the period of the proposed work (preferably measurable)
- Significance of proposed project
- Review of current knowledge in the field of study in which the application is made
- Work plan including project design of activities to be undertaken
- Description of experimental methods and procedures

Projects that involve collaborations or partnerships must be fully described and documented with an official letter from each collaborator or partner in this section of the proposal and reflected in the budget.

410.30 Evaluation

The purpose of an evaluative scheme is to determine whether the objectives of proposed project have been met. In general, formative evaluation will be used to monitor the day to day implementation of the project. Summative evaluation is normally employed to determine the final outcome of the project. For more information, contact the RSP staff.

410.35 References

All references should come from peer-reviewed journals (if at all possible). Citations must be complete, including full name of all authors, publication name, title and page location.

410.40 Biographical Sketches

The biographical sketch of the PI should contain information or documentation on his or her expertise in a specific area. It should also contain the overall qualification of the PI to conduct the proposed research or training program. Important components of a biographical sketch are listed below:

- Earned Degrees,
- Dates of Earned Degrees,
- Academic Institution(s) in which degree(s) were earned
- Grants and Contracts Received (include agency, brief project description and the dollar amounts)
- Recent Refereed Publications with relevance to proposed project,

- Refereed Presentations
- Research Interests and Teaching Experiences

410.45 Budget Development

The cost elements of a budget must correlate well with the objectives outlined in the project description. Cost estimates of individual line items should be carefully calculated so that the requested funds are adequate, but not excessive. Many proposals require cost sharing or matching funds to be included in the budget. Cost sharing may be either in the form of cash payments or special services provided by the University. Cost sharing or matching and leveraging must be approved by the Budget Office under Finance and Business Services. A good budget always contains budget details, summary, and justifications. The budget falls into two broad categories: Direct Costs and Facilities and Administration.

Direct Costs

OMB Circular A-21 defines Direct Costs as those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or F&A costs. In instances when an institution treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution. For more information on Direct Costs please see OMB Circular A-21 Section D. Direct costs usually include salaries and wages, fringe benefits, equipment, travel, participant support, and other direct costs.

A. Senior Personnel Costs

This section includes PIs, co-PIs, research faculty, PDs, and other senior research associates. The senior personnel may add an inflation factor of 4% to the base salary charged to the grant.

No supplemental pay or any compensation may be paid from a sponsored project unless it is specifically identified as such and requested from the agency in the proposal and approved by the contracting authority for the agency. As a general rule, it is expected that reassigned time will be allotted to conduct the activities of the sponsored project and, therefore, supplemental pay is not warranted. Summer salaries for senior personnel shall not exceed 33% of the academic salary unless it is restricted by the funding agency. Please review the University's compensation guidelines and policy for more information.

B. Other Personnel Costs

Other personnel costs consist of postdoctoral associates, technicians, computer programmers, graduate students, undergraduate students, and secretarial/clerical persons. Use current salary figures adding a 4% inflation factor for postdoctoral fellows, technicians, computer programmers, and clerical/ secretarial persons. If these positions are new, contact the Director of Human Resources to establish an approximate grade and salary. Contact the Dean of the Undergraduate Studies or the Dean of Graduate Studies for information on wages for undergraduate or graduate students.

C. Fringe Benefits

Fringe benefits include social security (FICA), retirement, unemployment, workmen's compensation, and insurance. Currently, the fringe benefits rate is utilized by the University for full-time PIs, PDs, faculty, computer programmers, clerical/secretarial persons, technicians and other nonstudent employees. Please consult the [RSP website](#) or Finance and Business Services to verify the current fringe benefits rate. When a funding agency allows a higher rate than the University rate, the higher rate may be charged.

For graduate students and undergraduate students, the fringe benefits are 0%.

D. Equipment

Equipment at the University is defined as an item of property that has an acquisition cost of \$1,000.00 or more with a service life of more than one year. Equipment items valued at less than \$1,000.00 are considered expendable equipment and should be listed on the budget as supplies.

E. Travel

Allowable travel must adhere to OMB Circular A-21 and CAU policy. It includes professional meetings, travel for consultation, field work, PD's meetings, relevant workshops, and visits with directors and managers at Federal agencies. There are two broad kinds of recognized travel at the University, domestic and foreign:

- **Domestic Travel:** Travel within the continental United States is considered to be domestic. Domestic travel includes air (economy) and ground (car, rail, bus, and taxi), lodging, food (per diem), and parking.

Per Diem rates, mileage rates, lodging limitation rates for in-state and out-of-state are available on the [CAU Purchasing Department website](#).

- **Foreign Travel:** All foreign travel must be approved by the President of CAU or designee. Proposals that involve foreign travel are non-standard. All persons on foreign travel must include adequate insurance for coverage of accidents, sickness, and death.

Travel requests and reimbursement for sponsored projects are processed in accordance with University travel procedures and guidelines. *For more on Travel Costs see OMB Circular A-21 Section J-53. The University's Travel Guidelines are available on-line at:*

<http://www.cau.edu/purchasing/TravelGuidelines.pdf>

F. Participant Support Costs

This budgetary category refers to costs of transportation, per diem, stipends, and other related cost for participants or trainees (participants or trainees are not employees) in connection with conferences, meetings, training activities, and workshops. F&A are not generally applied to participant support funds.

G. Other Direct Costs

Other direct costs include materials and supplies, publications, subcontracts/subgrants, consultants, computer services, all communication costs, repair, and maintenance.

- **Materials and Supplies**

The budget should indicate in general terms the type of expendable materials and supplies that are required, with the estimated costs. All materials and supplies must be in compliance with OMB Circular A-21.

- **Publications**

The budget may request funds for the costs to document, prepare, disseminate, and publish the findings from the research activity.

- **Subcontracts/Subgrants**

Collaboratives or research partnerships may include closely related and coordinated activities with another institution. The intent to enter in such an arrangement with another institution(s) should be fully disclosed and detailed in the proposal. These arrangements may result in a subcontract/subgrant.

- **Consultant Services**

This category consists of services rendered by others to Clark Atlanta University. It includes consultant and professional services, honoraria, and speaker fees and may include travel expenses of the consultant.

- **Computer Services**

The cost of computer services includes computer-based retrieval of scientific, technical and educational information as well as telecommunication services.

- **Communications**

This budget category includes telephone, facsimile, postage, advertising, data lines, and associated costs when allowed by the funding agency.

- **Repairs and Maintenance**

This section includes costs for maintaining property such as maintenance contracts, computers, photocopiers, and other office equipment.

See OMB Circular A-21 J for additional information on Other Direct Cost.

Facilities and Administration Costs (F&A)

F&A costs are those that are incurred in conducting research and sponsored program activity at an educational institution. At Clark Atlanta University, the Office of Naval Research negotiated and approved the F&A cost rate. This rate can be applied to all grants that require the use of a negotiated F&A cost rate. In some cases, private foundations and corporations may allow the use of a rate based on the actual cost of research administration that is higher than the negotiated F&A cost rate. Please contact RSP if there are questions concerning the F&A cost rate. For additional information and to verify the current negotiated F&A cost rate

refer to the [RSP website](#). For more information on F&A Costs please see OMB Circular A-21 Sections E and F.

420.00 PROPOSAL ROUTING AND APPROVAL FORM

All PIs are required to complete a Proposal Routing and Approval Form (RSP Proposal Routing Form). The form should be completed in its entirety prior to submission of the proposal to RSP for authorization and final approval. The Proposal Routing and Approval Form provide pertinent information concerning the proposed activity and the resources required to complete the project. A copy of the proposal should be attached to the approval form; in addition, an electronic copy of the proposal should be forwarded to RSP as a MS Word document or Adobe Acrobat pdf file. The department head and dean must complete the required information, review and approve the approval form before forwarding to RSP. The proposal approval form must be completed, approved and transmitted to RSP at least five working days prior to submission deadline.

Prior to writing the proposal, the PI should contact RSP to obtain guidance concerning the proper forms and the formatting specifications. Some funding agencies limit the number of proposals that a University may submit in response to a particular announcement or solicitation. When this occurs, the appropriate Dean along with one or more selected reviewers, as deemed necessary by the Dean, will make the selection as to which proposal(s) should proceed in consultation with the VPRSP. If consensus cannot be reached, the VPRSP will make the decision. The PI may also obtain forms from the [RSP website](#). The important checklist should generally include:

- Cost sharing contributions and percentages
- Appendix materials allowable
- Maximum budget allowed
- Special budget forms and application checklist
- Table of contents requirements
- F&A allowed and percentages
- Special assistance forms and required format
- Prior approval signatures
- Mailing address for proposals
- Application deadline (postmarked or received)
- Minimum and maximum of proposal pages per section
- Number of copies required
- Project duration (number of years of support allowed by sponsor)

430.00 PROPOSAL REVIEW, APPROVAL AND SUBMISSION

Prior to submission and institutional approval, all proposals should be reviewed by the PI's department head/director, dean and a Proposal Review Panel (PRP). Details of University's proposal review, approval and submission process are explained in the sections below.

When the required information and signatures of the department head and dean have been obtained, a proposal packet should be submitted RSP **no less than 5 business days before the proposal deadline**. The proposal packet should contain the following items.

1. Proposal routing form
2. Agency cover sheet
3. Complete final proposal (See Section 410.00 for proposal contents.)
4. Agency certification and assurance forms
5. Approval of appropriate compliance committee(s), if required
6. Letters of University endorsement (if applicable)

Only complete packets will be considered for RSP review and VPRSP signature. Incomplete proposal packets will be returned to the PI before processing.

430.05 Review by Department Head/Director

To process a proposal, the PI submits the proposal to the department head/director for review and approval. Since the head/director is charged with directing the PI's efforts at the University, this is a critical step in the proposal review and approval process. The review will focus on the following:

- the substance of the proposal, including the academic appropriateness and desirability of the proposed research or other sponsored activity;
- commitments of faculty and staff time, and their possible effects on the teaching and other obligations of the personnel involved (not to exceed 100% effort);
- salary arrangements (e.g., provision for summer support or a distribution of effort supported during the academic year);
- proper identification of proprietary information;
- requirements for space and facilities;
- the budget, especially a verification that all costs, including F&A costs, are provided for, that all needs are realistically estimated and stated, that items included are in compliance with the policies of the University and the sponsor, and that cost sharing funds are available when indicated in the proposal; and
- the identification of special conditions requiring review, such as the use of human subjects, biohazards, radioactive materials, etc. (If applicable, the proposal is sent to the appropriate committee for simultaneous review).

When the proposal has been approved within the department/center, it is strongly suggested that it be forwarded to a Proposal Review Panel (PRP) within the department or unit. The roll of the PRP is described below.

430.10 PROPOSAL REVIEW PANEL

The purpose of the PRP is to ensure that all proposals have merit and are well written. Also, in the event that a dean, director or department head refuses to approve a proposal, members of the PRP would serve as mediators between the PI and administrator.

Each department of a school or center of the University should establish its own PRP. Smaller schools or centers may wish to have only one PRP. Each PRP should meet regularly to review proposals and to promote scholarly activity among faculty and staff. However, special call meetings can be held to address urgent matters or to meet impending deadlines.

A good proposal has, as its core, a good idea. It must be innovative, forward-looking and creative as well as address a specific need. In a research proposal, the "good idea" must

emanate from good science, education, engineering or technology. It normally takes considerable time and effort to transform a good idea into a solid proposal. A good proposal is a document with sponsor-oriented structure. It should describe the "WHAT," "WHY," "HOW," "WHEN," and "WHO." Each panel member should address the intellectual merit of the proposal via the following queries:

- How important is the proposed activity to advancing knowledge and understanding within its own field or across different fields?
- To what extent does the proposed activity suggest and explore creative and original concepts?
- How well conceived and organized is the proposed activity?
- Is there sufficient access to resources?

In addition, panel members may also consider the following to address the broader impacts of the proposed activity:

- How well does the proposed activity advance discovery and understanding while promoting teaching, training and learning?
- How well does the proposed activity broaden the participation of the underrepresented groups (e. g., gender, ethnicity, disability, geographic locations, etc.)?
- To what extent will it enhance the infrastructure for research and education, such as facilities, instrumentation, networks, and partnerships?
- Will the results be disseminated broadly to enhance scientific, educational, and technological understanding?
- What are the benefits of the proposed activity to society?
- What is the potential for commercialization and creation of intellectual property assets?

430.15 Research Compliance Committee Review

If applicable, proposals are forwarded by the department head/director to the appropriate research compliance committee for review. Approval must be obtained from a compliance committee before it is forwarded to the VPRSP for signature. In the interest of expediency, the compliance committee review takes place simultaneously with other steps in the review and approval process. If approval cannot be provided in time for submission, the committee chair should note that approval is pending. Section 500 contains detailed information on the role and activities of all University committees.

430.20 Review by Dean

After they have been approved by the department head, proposals are forwarded to the dean. The dean's approval is required to ensure that the proposal is in keeping with the goals and objectives of the school. In the event that a dean is inclined to reject a proposal, members of the PRP would serve as mediators between the PI and the dean.

430.25 Review by RSP Staff

When the required information and signatures of the department head and dean have been obtained, a proposal packet should be submitted to RSP no less than **5 business days** before

the proposal deadline. The proposal packet should contain the items detailed in section 430.00.

The RSP staff review is conducted to ensure that all proposals are in compliance with University guidelines for externally funded projects. The additional review by RSP emphasizes and fine-tunes elements of the proposal that may have been overlooked by previous reviewers. Without refinement a technically outstanding proposal may not be funded.

The RSP review focuses on the following.

- Abstract - More reviewers read the abstract than the proposal itself. Great care should be given to its preparation; its importance cannot be overrated.
- Format - A clean, flawless format facilitates a professional evaluation of the science and relevance of the proposal, and prevents diversion by trivial considerations (e.g., typos, format errors).
- Clarity and Consistency - Proposals that are too general, too ambitious, or unfocused with unclear objectives and unfounded hypotheses or work plans draw the most common criticism.
- Document Details - Relatively minor matters such as poor spelling, low grade typing and copying, inadequate exposition, and incorrect citations of the literature are common weaknesses that are viewed unfavorably.

430.30 University Authorization

All proposals must be signed by an official authorized to sign on behalf of the University. The signature of the authorized official is necessary to indicate University endorsement of, and commitment to, the project. In many cases this authorization certifies compliance with federal regulations. In other cases the authorization represents preacceptance of terms and conditions of the award.

The VPRSP is the authorized institutional official for CAU. Please use the name and information below when referring to the authorized institutional official for all grant proposal cover pages, certifications, etc.

Dr. Marcus W. Shute, P.E.
 Vice President for Research and Sponsored Programs
 223 James P. Brawley Drive, S.W.
 Atlanta, Georgia 30314

Phone (404) 880-6990
 Fax (404) 880-6983

E-mail Address: research@cau.edu

430.35 Submission to Agency

Once a proposal has been signed by the VPRSP, it is ready for submission to the funding sponsor. It is the responsibility of the PI to duplicate and mail proposals. The number of

copies of a proposal required by sponsoring agencies varies. In addition to the original to be submitted to the sponsor, one copy is required for the official University file maintained by RSP. If in doubt, the PI should contact the sponsor to determine the number of copies required if the guidelines do not give specific instructions.

To ensure timely proposal submission, the PI should be aware of the type of deadline the sponsor has indicated.

- A receipt deadline is the date by which the sponsor must receive the proposal.
- A postmark deadline means that the proposal must be postmarked by that date, not necessarily received by the sponsor.

In most instances a proposal will not be considered if submitted after the agency deadline. To meet a critical deadline, familiarity with the available express courier services and methods of electronic submission will facilitate timely proposal submission.

430.40 Electronic Submission of Proposals

An increasing number of funding agencies require electronic submission of proposals. Electronically submitted proposals are subject to the same University review and approval process as paper proposals. Proposals should not be transmitted to the sponsor until the University review and approval process is complete – this includes obtaining the signature of the VPRSP on the CAU Proposal Approval form. Each sponsor has a different procedure for electronic submission. Please consult the agency's website for submission instructions.

500.00 RESEARCH COMPLIANCE POLICIES

The Compliance Coordinator of RSP is responsible for coordinating the Animal Care and Use Committee, Biosafety Committee and Radiation Safety Subcommittee, Human Subject Committee, and the Research Integrity Committee. The Research Compliance Committee members are recommended by the Director of RSP to the VPRSP. Compliance issues involving the Office of Management and Budget (OMB) and its Circulars, particularly, Circular [A-21](#), [A-110](#) and [A-133](#) are summarized. **Additional details and forms can be obtained at RSP website.**

505.00 HUMAN SUBJECTS COMMITTEE

The University adheres to [45 CFR 46, Protection of Human Subjects](#), as amended by federal policy, effective June 23, 2005. These Federal regulations require the University to submit to the funding agency a statement of specific assurance for each research proposal involving human subjects. It is therefore required that each proposed project seeking funds from an external agency involving human subjects be reviewed by the Human Subjects Committee, except where expedited review procedures are implemented by the Chair of the Human Subject Committee or the Compliance Coordinator of RSP. Expedited review procedures may be carefully used only when:

- Some or all of the research appearing on the list and found by the reviewer to involve no more than minimum risk.

- Minor changes in previously approved research during the period of one year or less for which approval is authorized.

The Human Subjects Committee has the authority to suspend or terminate approval of research that is not being conducted in accordance with the Human Subjects Committee's requirements or that has been associated with unexpected serious harm to subjects. In the event of a suspension or a termination of approval, a statement indicating the justifications for such actions taken by the Human Subjects Committee will be issued to the PI.

The general requirements for Informed Consent, where a human is used as a research subject, mandate that the PI obtain the legally effective informed consent of the subject or the subject's legally authorized representative. A PI shall seek such consent only under circumstances that provide the prospective subjects or the authorized representative sufficient opportunity to consider whether or not to participate and to avoid the minimal possibility of coercion or undue influence on the subject. The information given to the subject or authorized representative must be in understandable language. No Informed Consent, whether oral or written, may include any exculpatory language through which the subject or the authorized representative is made to waive or appear to waive the subject's legal rights or releases. Also, it must not appear to release the PI, the sponsor, the University or its agents from liability for negligence (45 CFR 46.16).

The Human Subjects Committee shall prepare and maintain adequate documentations of committee activities, including the following:

- Copies of all research protocols reviewed, scientific evaluations, if any, that accompany proposals, approved sample consent documents, and reports of injuries to subjects
- Minutes of the Committee meetings which shall be sufficient in detail to show attendance at the meetings, actions taken by the Committee, votes on these actions taken including the number of members for, against, and abstaining. Minutes should contain the basis for changes in or disapproving the research, and a written record of the controverted issues
- Records of continuing review activities of Human Subjects Committee must be carefully filed
- Copies of all correspondence between the Committee and the investigators
- A list of the Committee members in detail as in section 46.103(b)(3)
- Written procedures for the Committee in detail as in section 46.103(b)(4) and 46.103(b)(5)
- The records required by this policy, shall be retained for at least 3 years after completion of the research. All records shall be accessible for inspection and copying by authorized representatives of the Office for the Protection from Research Risks (OPRR)
- Statements of significant new findings provided to subjects as required in section 46.116(b)(5).

In the event research is undertaken without the intention of involving human subjects, but is later proposed to involve human subjects in the research, the research project must be first

reviewed and approved by the Human Subjects Committee, as provided by this policy, the research and certifications must be submitted by the University to the Office for the Protection from Research Risks (OPRR). Each Human Subjects Committee shall have at least five members with varying backgrounds to promote a complete and adequate review of research activities commonly conducted by the University. The Human Subjects Committee at the University should have a community person to deal with the varying array of human subjects research projects. The Committee usually meets twice per semester, or as needed, to review research projects, and to participate in seminars and workshops on the protection of human subjects against research risks. Call meetings are scheduled according to need.

510.00 BIOSAFETY COMMITTEE

The University conducts research and academic laboratory activities that involve the use of hazardous materials. These materials, if not properly used, stored, transported, and disposed of, may pose a risk to persons or the environment by virtue of their properties, such as toxicity, corrosiveness, reactivity, flammability, infectivity, and others. It is the University's position that it will adhere to 49 CFR 173. To be in full compliance with local, state, and federal regulations, CAU seeks to provide a research environment free from recognized biohazards and comply with agencies such as the Georgia Occupational Safety and Health Administration, the Georgia "State Regulations for Protection Against Radiation," Department of Environment and Conservation (Division of Radiological Health), Occupational Safety and Health Administration (OSHA), and the Environmental Protection Agency (EPA). The Biosafety Committee was established to aid in this effort. The chair of the Biosafety Committee is the University's Biosafety Officer.

515.00 CAU RADIATION SAFETY OFFICER

The Radiation Safety Subcommittee, a special subcommittee designed to ensure the safe use of radioactive materials, radiation-producing equipment, and all uses of ionizing radiation within the confines of Clark Atlanta University, will consist of the local CAU Radiation Safety Officer, who is the University's liaison to the Atlanta University Center (AUC) Radiation Safety Committee, and other persons with the appropriate skills to assist in this effort. However, only the AUC Radiation Safety Officer is authorized to receive and dispose of radioactive material. The CAU Radiation Safety Officer and the Compliance Coordinator of RSP are responsible for monitoring and coordinating the storage, use and disposal of radioactive materials at CAU in conjunction with the AUC Radiation Safety Committee. The CAU Radiation Safety Officer is also required to conduct or coordinate with the AUC Radiation Safety Committee at least two workshops per annum (Fall and Spring semesters) on radiation safety, storage, monitoring, and disposal.

520.00 INSTITUTIONAL ANIMAL CARE and USE COMMITTEE

Federal regulations require that institutions using animals as research subjects must carefully monitor animal care and use. The University adheres to Subchapter A, "Animal Welfare" of Title 9 of the Animal Projects Act. The standards contained in the PHS/NIH Guide for the Care and Use of Laboratory Animals governs the use of animals in research and teaching at Clark Atlanta University. The Institutional Animal Care and Use Committee (IACUC) housed at Morehouse School of Medicine is charged with the responsibility of approving all studies and proposals involving experimental animals, and serves as the Atlanta University Center (AUC) IACUC. CAU will have a representative to this committee that will serve as the liaison for CAU faculty and scientists. A local committee may be formed to assist in the training effort and to

review protocols before submission to the AUC IACUC. Its functions include inspection of the facilities; evaluation of programs and animal activity areas; submission of reports to each of the member institutions; review of proposed uses of animals in research, testing or education; and establishment of a mechanism for receipt and review of concerns involving the care and use of animals at the University.

It is the responsibility of the CAU representative to the Morehouse School of Medicine Animal Care and Use Committee to oversee and evaluate the University's animal program, procedures, and facilities to ensure that they are consistent with the recommendations of the Federal Animal Welfare Regulations (referred to as AWRs - CFR 1085) and the PHS Policy. It is also the responsibility of the CAU representative with the assistance of RSP to provide suitable orientation, background materials, access to appropriate resources, and if necessary, specific training to assist the members of the CAU IACUC in the understanding and the evaluating issues brought before the Committee.

The Committee membership should be broadly composed of diverse individuals from the community and the University. A link to the Committee and its schedule, composition, and forms is on RSP website.

525.00 RESPONSIBLE CONDUCT OF RESEARCH/RESEARCH INTEGRITY COMMITTEE

To ensure research at Clark Atlanta University is conducted effectively, objectively and without improper influence or the appearance of improper influence, the Research Integrity Committee has been established. This Committee is not required by the Office of Research Integrity (ORI), but serves a very useful purpose in meeting several PHS requirements on allegations involving scientific misconduct in research and other requirements by the Alcohol, Firearms and Tobacco (AFT) Organization. The chair of this committee serves as the University's Research Integrity Officer and administers the University's policy on *Responding to Misconduct in Research*. The Committee has oversight of all inquiries and investigations associated with allegations of scientific misconduct. In addition, the Committee conducts periodic training sessions to review this issue. Many queries involve questions of "honest differences" in interpretation or judgments of data, which are specifically excluded under the PHS definition (45 CFR 50.102). These inquiries and investigations on scientific misconduct include the following:

- Research Fraud
- Falsification
- Plagiarism
- Fabrication
- Other Serious Deviations

PIs, as well as personnel working in the laboratories of the PIs, are strongly encouraged to visit the ORI's [Introduction to the Responsible Conduct of Research](#) web tutorial for more information on this topic and review the University's policy on *Responding to Misconduct in Research*.

530.00 OFFICE OF MANAGEMENT and BUDGET (OMB) CIRCULARS

The predominant mission of the Office of Management and Budget (OMB) is to assist the President of the United States in overseeing the preparation of the Federal budget, and to supervise its administration with the Executive Branch agencies. In an effort to formulate the President's spending plans, OMB evaluates the effectiveness of agency programs, policies, and procedures. It also assesses the competing funding demands among agencies, and sets funding priorities. In addition, OMB oversees and coordinates the Administration's procurement activities, financial management, information, and regulatory policies.

The OMB Circulars are identified by the letter "A" and a number. When an instruction in an OMB Circular is revised, the pertinent circular will be reissued with the same number and a new date. There is a large number of OMB Circulars in existence at the Office of Management and Budget, which includes [A-21](#), [A-110](#), and [A-133](#).

[OMB Circular A-110](#) sets forth standards for obtaining consistency and uniformity among federal agencies in the administration of grants to and agreements with institutions of higher education. [OMB Circular A-133](#) is issued pursuant to a Single Audit Act of 1984, P.L., 98-502, and Single Audit Act Amendments of 1996, P.L., 104-156. It sets forth standards for obtaining consistency and uniformity among federal agencies for the audit of State and Local Governments, and nonprofit organizations expending federal awards. Although OMB Circulars [A-110](#) and [A-133](#) are important, only [OMB Circular A-21](#) is directly applicable to most research, training and service (or outreach) issues of educational institution.

The purpose of [OMB Circular A-21](#) is to establish principles for determining costs applicable to grants, contracts, and cooperative agreements with educational institutions. The principles deal with the subject of cost determination and make no attempt to identify the circumstances or dictate the extent of agency and institutional participation in the financing of a particular project.

535.00 OMB DEFINITIONS OF RESEARCH and INSTRUCTION

Major functions of the University refer to instruction, organized research, other sponsored activities, and other institutional activities. The following Office of Management and Budget descriptions are summarized below:

535.05 OMB DEFINITION OF ORGANIZED RESEARCH

Organized research means all research and development activities of the University that are organizationally structured and separately budgeted and accounted for. It includes the following:

Sponsored Research

Sponsored Research means all organized research and development activities that are sponsored or funded by federal agencies or private organizations. This term includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other research and development activities, and where such activities are not included in the instructional category.

University Research

University Research includes all organized research and development activities that are separately budgeted and accounted for by the University under an internal application of institutional funds.

535.10 OMB DEFINITION OF INSTRUCTION

Instruction involves the teaching and training activities of the University. It includes all teaching and training activities, whether they are offered for credits toward a degree, certificate or on a noncredit basis; and whether they are offered through regular academic departments or separate divisions. Also, considered as a part of this major function, are departmental research, and in some cases, university research.

Sponsored Instruction and Training

Sponsored instruction and training are specific instructional or training activity established by grant, contract, or cooperative agreement. For purposes of cost principles, this activity may be considered a major function even though the University's accounting treatment may include it in the instruction function.

Departmental Research

Departmental research means research, development and scholarly activities that are not organized research and consequently, that does not have a separate budget and account. Departmental research is not considered a major function, but a part of the instruction function of the University. For all practical purposes, departmental research at Clark Atlanta University is designed to train students in the methods of research, and the ways in which scientists work and solve problems.

535.15 OMB DEFINITION OF OTHER SPONSORED ACTIVITIES

Other sponsored activities mean programs and projects financed by federal agencies and private organizations which involve the performance of work other than instruction and organized research.

535.20 OMB DEFINITION OF OTHER INSTITUTIONAL ACTIVITIES

Other institutional activities include all activities other than instruction, departmental research, organized research, and other sponsored activities.

540.00 OMB DEFINITION OF UNALLOWABLE COSTS

The costs listed below, whether direct costs or F&A costs, cannot be charged to the sponsored agreement on grants, contracts or cooperative agreements unless specially approved in such grant or contract, as outlined in [OMB Circular A-21](#). The PI may obtain full information on this issue by reviewing the OMB circulars which may be accessed using the hyperlink above and is strongly encouraged to do so. The list includes:

- Advertising, Public Relations Costs, ALCOHOL, Alumni Activity Costs, Bad Debts, and Local Civil Defense Costs not on the University's premises;
- Commencement and Convocation Costs;

- University Furnished Automobile Costs for Personal Use, Contingency Provision Costs, Defense and Prosecution of Criminal and Civil Proceedings, Claims, Appeals and Patent Infringement Costs;
- Depreciation Reserves Costs, Donations or Contributions, and Entertainment Costs (Includes amusement, diversion and social activities);
- Executive Lobbying Costs, Fines and Penalties (including late fees);
- Goods and Services Costs for Personal Use, and Housing and Personal Living Costs;
- Insurance Costs to Protect against Defects in the University's Materials or Workmanship, and Interests, Fund-Raising and Investment Management Costs;
- Losses on Other Sponsored Agreements, and Student Activity Costs;
- Membership Costs in Civic Clubs, Community Organizations, Country Clubs, Social or Dining Clubs or Organizations;
- Recruiting Costs for Help-Wanted Advertising, and Pre-Agreement Costs Prior to effective Date of Agreement;
- Selling and Marketing Costs of Products or Services of the University;
- Severance Costs in Excess of the University's Normal Severance Pay;
- Specialized Service Facilities Charges in an amount more than an Aggregate Costs of Service over a Long-Term Period; and
- Airfare Travel Costs in Excess of the Lowest Available Commercial Discount Airfare or Customary Standard Coach Airfare

545.00 OMB DEFINITION OF ALLOWABLE COSTS

- a) A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationship. Subject to the foregoing, a cost is allocable to a sponsored agreement under the following conditions:
- It is incurred solely to advance the work under the sponsored agreement.
 - It benefits both the sponsored agreement and other work of the University, in proportions that can be approximated through use of reasonable methods.
 - It is necessary to the overall operation of the University and, in light of the principles provided in this Circular, is deemed to be assignable in part to sponsored projects. Where the purchase of capital items (or equipment) is specifically authorized under sponsored agreement, the amounts thus authorized subsequently be made part of the capital items (or equipment) involved.
- b) Any costs are allocable to a particular sponsored agreement under the standards provided in this Circular. Such costs may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or other reasons of convenience.
- c) Any costs allocable to activities sponsored by industry, foreign governments or other sponsors may not be shifted to federally-sponsored agreements.
- d) The allocation and documentation standard include the following:

- **Cost Principles:** The recipient University is responsible for ensuring that costs charged to a sponsored agreement are allowable, allocable and reasonable under these cost principles
- **Internal Controls:** The University's financial management system shall ensure that no one person has complete control over all aspects of a financial transaction
- **Direct Cost Allocation Principles:** If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefits. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then notwithstanding subsection b, the costs may be allocated or transferred to benefited projects on any reasonable basis, consistent with subsection d. (1) and (2) of this Circular.
- **Documentation:** Federal requirements for documentation are specified in this Circular, [Circular A-110](#), "Uniform Administrative Requirements for Grants and Agreements with the Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations," and specific agency policies on cost transfers.

550.00 COST ACCOUNTING STANDARDS

The Cost Accounting Standards Board (CASB), established by Congress and currently located in the Office of Management and Budget (OMB), is authorized to promulgate and maintain standards to achieve uniformity and consistency in measuring and allocating costs to negotiated defense and civilian contracts and subcontracts/subawards.

Prior to January 5, 1995, educational institutions were exempt from cost accounting standards (CAS) as well as disclosure statements. Under this requirement, educational institutions receiving contracts in excess of \$500,000 must be CAS-covered. There are four cost accounting standards applicable to educational institutions:

- 501) Consistency in Estimating Accounting and Reporting Costs
- 502) Consistency in Allocating Costs Incurred for the Same Purpose
- 505) Accounting for Unallowable Costs
- 506) Cost Accounting Period

555.00 DISCLOSURE STATEMENTS

Educational institutions receiving more than \$25 million in a federally-sponsored agreement during their most recently completed fiscal year, must file CASB's disclosure statement (DS-2). There are two types of disclosure statements:

- Disclosure Statement 1(DS-1): DS-1 applies to Commercial Contractors
- Disclosure Statement 2 (DS-2): DS-2 applies to Universities

The actual disclosure of the statement (CASB DS-2) is found in the [OMB Circular A-21](#). Each reporting unit is required to complete various portions of the CASB DS-2. The CASB DS-2 is a 20- page document that provides a summary of an educational institution's cost accounting system for federal grants and contracts.

600.00 CONTRACT AND GRANT ADMINISTRATION

Grants are awarded to the University to conduct basic and applied research or other sponsored program activities from federal agencies and private foundations. Contracts, on the other hand, are agreements between the University and the sponsor to provide a service or deliver a product. For this reason, research or sponsored programs that are awarded as contracts are called deliverables.

600.05 PROPOSAL AWARD RECEIPT

An award to the University from a sponsoring agency obligates the University to a contractual commitment. An award may simply be in the form of a letter issued by an authorized agent of the sponsor, or it may consist of a detailed contract.

The Division of Research and Sponsored Programs, Division of Finance and Business Services, or the Office of the President normally receives notification of the acceptance or rejection of proposals. If award notices or letters of rejection come directly to the President, Finance and Business Services or the PI/PD, the original copies should be forwarded to the Division of Research and Sponsored Programs. Upon receipt of an award, RSP staff reviews the award letter with the PI to ensure that the scope, timetables, work statements, and deliverables are acceptable. RSP staff assists the PI in setting up the budget, obtaining an account number through Finance and Business Services, and reviewing information on the University's policies and procedures on grant and contract administration within the terms and conditions outlined by the agency. If a signature is required on the award receipt letter, only the President or the Vice President of Research and Sponsored Programs is authorized to sign on behalf of the University. RSP sends the appropriate documents to Office of Grants and Contracts Accounting (OGCA) in Finance and Business Services for processing.

Awards for proposals not authorized by the University, and not having completed approval forms with appropriate signatories may be rejected by the University. **IN ALL CASES, THE UNIVERSITY RESERVES THE RIGHT TO REJECT AN AWARD.**

The University does not permit work to be performed on any proposed project until the sponsor has granted the award and the PI has been certified by attending the RSP Principal Investigator Certification Workshop (RSP 101), the completion of the Annual Mandatory Compliance Training Workshop, as well as any other required training. No charges may be incurred against a sponsored project until RSP has received and processed the formal award notification from the sponsor and an account number has been issued by Finance and Business Services. Please refer to the [Policies and Procedures for Government Sponsored Programs](#) for more in-depth discussion on the role of the OGCA in contract and grant administration. No commitments to personnel or subcontracts/subawards should be made prior to receipt of an official award document.

On occasion, the actual document of the sponsor authorizing project expenditures may be delayed. If a short delay will impede the progress of the project, the PI/PD may request approval for limited early expenditures. Such requests are channeled through RSP. These and other exceptions to policy are based on a written request from the PI and the approval by the VPRSP and Vice President for Finance and Business Services.

600.10 NEGOTIATIONS

RSP negotiates the type of contract, terms, conditions and financial arrangement including the budget, while the PI/PD and the sponsor negotiates the technical aspect of the proposal. Although the technical aspects of the proposal are negotiated by the PI with the sponsor, RSP should be notified immediately of any changes made in the proposal. This is needed because any change in project scope may affect the costing arrangement and other contractual aspects, especially the duration and performance. It is mutually beneficial for the PI and the University to work together to develop strategies and options in negotiating. RSP is the official negotiator involving the budget, implementation, and interpretation of University policy. If the negotiations result in major contractual or technical changes to the original proposal, the revised proposal must be resubmitted through the proposal approval process of the University.

605.00 GRANT AND CONTRACT ACCOUNTING RESPONSIBILITIES

When a proposal is awarded (becomes a grant/contract/cooperative agreement/ purchase order), the PI works with RSP and OGCA staff to manage the award. In general, the PI performs the technical aspects of the award, while OGCA staff members handle the financial accounting of the grant or contract. Please refer to the [Policies and Procedures for Government Sponsored Programs](#) for more in-depth discussion on the role of OGCA in contract and grant administration. The specific responsibilities of the PI, Department Head, Dean/Director, Finance and Business Services Staff, Director of RSP, and VPRSP are summarized in the following sections.

605.05 PRINCIPAL INVESTIGATOR

The PI is charged with the responsibility of the successful implementation of his or her project. The overall responsibilities for the PI are listed below.

- Work with RSP staff to obtain an account number from Finance and Business Services,
- Ensure that the project is carried out in a timely fashion as outlined in the proposal,
- Consult with teaching unit heads, dean or director for the appropriate level of percent effort to be devoted by the faculty, adjunct professors, research associates, and postdoctoral fellows according to grant or contract provisions,
- Manage the budget according to the terms and conditions of the award,
- Recruit and hire personnel in accordance with University policies and procedures, including affirmative action,
- Ensure adherence to all University policies and procedures,
- Work closely with the RSP postaward personnel on the rate of spending, purchasing, and no-cost extensions,
- Meet with OGCA quarterly to review expenditures and rate of spending on restricted accounts,
- Perform monthly account reconciliation,
- Supervise project personnel according to the criteria established by the contract, grant or cooperative agreement,
- Prepare and submit annual, semiannual, quarterly, interim and final project reports to the Department Head, RSP, and the sponsor before the agency deadline,

- Consult with the RSP and the program manager of the sponsor when major changes in the project are needed.

605.10 Postaward Staff

The postaward staff is the central link between the PI, Grants Analysts in Finance and Business Services, and the sponsor. The postaward staff is responsible for the overall management and administration of all grants, contracts and cooperative agreements. The specific responsibilities are listed below.

- Officially inform PI, department head, and dean or center director of the award;
- Review aspects of the award with PI when appropriate (Start-up Conference);
- Prepare and distribute “project briefs” and authorization of budget;
- Assist with funding changes;
- Ensure that project expenditures adhere to University and sponsor guidelines;
- Assist in preparation of consulting agreements and subcontracts/subgrants;
- Handle negotiations in areas of property disposal or transfer;
- Establish accounts for PIs through Grants Analysts in Finance and Business Services;
- Provide no-cost extensions to PIs through the sponsor;
- Monitor the rate of spending of the PI;
- Assist Grants & Contracts Accounting with time certifications process through department heads and directors;
- Assist in the internal management of the project;
- Assist PIs and program managers with the reconciliation of research funds, and
- Advise the Finance and Business Services Staff along with the PIs on closeout dates.

605.15 DEPARTMENT HEAD

The department head is the official supervisor for the PI or PD within his or her departmental unit for all schools. In some cases, as in institutes or centers, the PI or PD reports to the Director of that center or institute. Federal regulations require an effort reporting system, known as Time and Effort Certification, to support and document salary charges to federal grants and contracts, as well as to determine the administrative effort charged in the facilities and administration of direct cost rate. It is the responsibility of the department head to ensure that personnel in the department certify time and effort reports in an accurate and timely fashion. The department head must provide guidance to the PI, PD or employee in the review of, correction of, and certification of the accuracy of time and effort supported by a federal grant or contract. Time and Effort for federally funded projects is documented on a semester basis for faculty and staff. Payroll timesheets are used to certify for hourly employees (including students). Please contact OGCA regarding the University’s Time and Effort policy.

605.20 DEAN/DIRECTOR

The dean or center director is responsible for each department head within his or her school or center to implement the overall research plan. The dean or director encourages department heads to engage their faculty or research staff into leading edge research and innovative training projects. The responsibilities are to:

- Develop a research action plan;
- Allocate the school/center resources involved in implementing research proposals resulting from research awards;
- Advise RSP negotiators concerning negotiating strategies and options preferred;
- Review and revise proposal commitments based on negotiations;
- Ensure that all PIs follow University policies and assume project administrative responsibilities, and
- Review and authorize appropriate forms for payroll authorizations, new hires, purchases, and other project related expenses.

605.25 FINANCE AND BUSINESS SERVICES STAFF

The appropriate Finance and Business Services staff works closely with RSP preaward and postaward personnel in the overall administration and management of the grant or contract. The responsibilities of the staff are listed below.

- Provide cost share/leveraging funds for proposals;
- Prepare invoices and make “cash draw downs” from appropriate federal agencies;
- Prepare inventory property reports;
- Review and approve requisitions;
- Make reports to Federal agencies;
- Endorse personnel action forms;
- Assign account numbers for new awards. Account numbers will not be assigned to an award without a CFDA Number.

If a CFDA number is not available or not assigned by the federal agency for an award, then an internal “**identifying number**” will be assigned and shall contain the following:

1. two-digit prefix of the federal awarding agency which shall be obtained from the Federal Audit Clearinghouse list
2. assign a 0 for the last three digits of the number (84.000)
3. the instrument number (i.e. grant, cooperative agreement, contract, or prime agreement number for pass thru awards) assigned by the federal awarding agency.

Finance and Business Services staff and the staff of Research and Sponsored Programs work closely to ensure the success of all awards.

605.30 VICE PRESIDENT FOR RESEARCH AND SPONSORED PROGRAMS

The Vice President for Research and Sponsored Programs is the Chief Research Officer of the University. RSP is the unit responsible for research administration at the University. The major postaward responsibilities for the VPRSP include the following.

- Approve exceptions to policy;
- Serve as final arbitrator of the University’s negotiating position;
- Determine all actions relative to sponsored projects and coordinate resolution of financial issues.

605.35 DIRECTOR OF RESEARCH AND SPONSORED PROGRAMS

The Director of Research and Sponsored Programs is administratively responsible for the daily administration and management of all research and training grants, contracts, and cooperative agreements. In circumstances where it is not clear to the PIs or PDs who they are to contact in RSP for specific information, the Director will assist the PI in contacting the appropriate RSP staff member.

610.00 TIME AND EFFORT REPORTING SYSTEM

Federal agencies, as well as the University, require documented accountability of personnel supported partially or totally by federal funds ([OMB Circular No. A – 21](#)). All federal agencies that sponsor research and development, training, and other work require that Time and Effort Certification Forms be submitted on a regular and timely basis as summarized below.

610.05 TIME AND EFFORT CERTIFICATION PROCEDURE

The University's official document for certifying time and effort for all University employees paid on federally funded grants is processed each semester by OGCA. Notifications to review and certify time and effort forms are sent from OGCA via the responsible Vice President to all employees of the University. Employees are to check their time and effort form to ensure that the preprinted information (account number with corresponding percent effort) is correct before signing for a given time period. If the employee can not sign, an immediate supervisor can certify in the employee's absence. An immediate supervisor is defined as someone who has firsthand knowledge of an employee's work effort.

610.10 CORRECTING TIME AND EFFORT INACCURACIES

In the event that the time and effort information on the monthly or bimonthly timesheet is incorrect, exceptions are placed on the time and effort form and then signed. A Change in Personnel Distribution Form must also be completed to ensure that the corrections are made.

615.00 SPECIAL PURCHASING ARRANGEMENT

The nature of research and training projects make it difficult for PIs and PDs to always properly plan or anticipate their purchasing needs that are critical in conducting the research or training grant. Concomitant with the above purchasing problems, are the unexpected technical problems, expected "rate of spending" by the sponsoring agency, invoicing the foundation or agency funds, date of completing the project of a research/training grant or cooperative agreement, and the time frame for delivering a product or service in a contract. Failure to execute the negotiated requirements in a timely manner may result in poor management of the grant, contract or cooperative agreement, which could result in termination of the contract or grant. To avoid this problem or the appearance of it, grants, contracts, and cooperative agreements will be given high priority and special purchasing approvals to satisfy the terms and conditions of the awards accepted by the University.

Competitive Bidding

All procurement transactions or purchasing activities must be conducted in a manner to provide free and open competition to the general public as outlined in the Revised OMB Circular A-110. For further information, you may review the Purchasing policies and procedures or contact the Purchasing Manager at the University.

Sole Source Procurement

PIs or PDs may use only sole source procurements (noncompetitive bidding) when the purchase, sealed bid, or competitive bidding is not possible or feasible. Sole Source Procurements must consist of one or more of the following:

- The item to conduct the specific research or carry out the training is available from only one source.
- There is an exigency or emergency need for the item, and cannot be delayed under the competitive bidding process.
- The sponsor authorizes noncompetitive solicitations to purchase items for specific research and training activities.
- After several competitive “biddings” from a number of sources, competition is determined inadequate or futile.

The PI may obtain the appropriate form and more information on how to develop and use sole source requests from Purchasing.

615.05 PROPERTY MANAGEMENT

All agencies that provide funds for the acquisition of equipment require that items be accounted for annually and properly maintained. The policy manuals of the federal agencies will provide the regulations governing equipment purchased with federal funds.

As a term or condition under most awards, the University in consultation with the PIs/PDs are required to make annual inventory reports to the federal agencies. The University requires inventories to be made on all equipment with a life expectancy of at least one year and costing \$1000 or more. The Accounting Department maintains the inventory records for all University-owned equipment. The PI may request inventory information from the Accounting Department. RSP will assist Accounting in verifying the accuracy of the inventory for property purchased with federal funds.

620.00 CHANGES IN RESEARCH/TRAINING BUDGET

Funds of sponsored grants, contracts, or cooperative agreements involving research and training must not be transferred from one object code to another without approval from RSP. Major changes in the budget of a research or training project may change the nature and content of the original proposal, under which it was funded by the sponsor. Moving funds from one object code to another object code may lead to unallowable purchases or even misappropriation of federal funds. OMB Circular A-110 (from A-21 to A-110), under certain conditions, permits small changes in budget categories not to exceed 10%. However, if major budgetary changes are needed, the PI through RSP must seek and obtain written permission from the grants officer and concurrence from the program manager of the sponsoring agency. The RSP staff will assist the PI in making a formal request to the sponsor for major budgetary changes. RSP will make every effort to submit all requests for budgetary changes (through Budget Revision Forms) to the appropriate Grants Analyst in OGCA as soon as written permission from the sponsor is granted.

625.00 TECHNICAL RESEARCH AND TRAINING REPORTS

All federal agencies and private foundations require grant/contract recipients to make progress reports on their research or training projects in compliance with Attachment H, OMB

Circular A-110. Information may also be provided from agency publications. A copy of all reports must be forwarded to RSP for review and approval prior to submittal to the funding agency.

700.00 RESEARCH AND SPONSORED PROGRAMS POLICIES

Research, training and other creative activities are vital components of Clark Atlanta University's mission. Faculty, staff, and students undertake research to fulfill one of the obligations of all institutions of higher education, the systematic advancement of knowledge. In addition, through sponsored programs, the faculty, staff, and students develop professionally, enhance the University's research resources, strengthen the academic programs, and provide for student participation and public service.

This section of the handbook seeks to assist the faculty and staff with understanding the research policies and procedures of the University in preparing proposals for research and sponsored programs, and to administer the resultant grants, contracts, and cooperative agreements.

705.00 DRUG-FREE WORKPLACE

The University is committed to maintaining a work environment free from illegal drugs and drug abuse. In addition to its own Drug Abuse Policy, the University complies with the requirements of the Drug-Free Workplace Act of 1988, as well as special Drug-Free Work Force rules issued by the U. S. Department of Defense and other federal agencies. PIs working on federally sponsored projects have a responsibility to ensure a drug-free workplace and work force. The University is also required to notify the federal contracting agency after learning of any employee's criminal drug conviction in the workplace.

715.00 SUPPLEMENTAL PAY (SP)

Supplemental Pay (SP) for principal investigators and PDs, who are conducting research and training projects, is discouraged, and in most cases, prohibited when federal funds are involved. PIs and PDs should request release time from teaching or other assignments in order to conduct externally funded projects in lieu of requesting Supplemental Pay. Supplemental Pay is considered to be an exception to policy and must be approved by the funding agency, endorsed by the supervisor, and approved by the VPRSP and the Vice President for Academic Affairs in the case of faculty members.

720.00 FACULTY RELEASE TIME

Faculty release time for potential PIs or PDs is discussed at the departmental level with the Department Head during the early preliminary stages of developing the proposal, and if the PI's idea is aligned with the vision of the department and school/center, the proposal will be approved by the Dean/Director. The amount of release time requested for the PI or PD by the Department Head and approved by the Dean or Center Director should be proportional to the amount of time and effort required to conduct the sponsored project.

725.00 TRAVEL

All research travel, foreign or domestic, must adhere to the provisions under OMB Circular A-21 and CAU policy. The PI must secure adequate personal insurance coverage and obtain CAU and agency approvals for all foreign travel. For further information, please contact the Purchasing Department.

730.00 LEAVES

The University has several types of leaves which include: annual leave, sabbatical leave, sick leave, jury duty, and military duty.

730.05 ANNUAL LEAVE

Annual leave is only applicable to employees working 25 hours or more per week. The University awards each employee varying hours per month to qualifying employees. Carryover of annual leave varies based on the number of years of service. Contact the Office of Human Resources for detailed information regarding annual leave.

Transfer From Unrestricted Funds to Restricted Funds

A person with accumulated annual leave who is currently supported totally or partially on unrestricted funds, and who transfers to a restricted funds program shall be paid for this annual leave with unrestricted funds and not restricted funds.

730.10 SICK LEAVE

Qualifying staff members at CAU are given one day per month for sick leave (12 days per year). Sick leave may be either personal or family related. Sick leave balance shall be maintained on record by the Office of Human Resources. Contact the Office of Human Resources for detailed information regarding sick leave.

735.00 NO-COST EXTENSION

A no-cost extension (NCE) provides for an additional period of performance to accomplish project goals without additional funding. The PI must request permission for NCE from the sponsor through RSP. The PI/PD should consult the agency's guidelines regarding no-cost extensions. The award end date remains unchanged until official notification has been received from the awarding agency.

740.00 CARRYOVER FUNDS

Sponsor policies vary in their handling of funds unspent at the end of the budget period. PIs working under multiyear awards should check with the individual sponsors to avoid potential issues. Requests for the carryover funds are routed through RSP to the sponsor, explaining why such funds exist and how they will be used during the next budget period.

745.00 TRANSFER OF GRANT OR CONTRACT

A faculty member coming from another institution may wish to transfer a sponsored project to Clark Atlanta University. Such a transfer requires the approval of both the originating institution and the sponsoring agency. To initiate the transfer process, a new or revised proposal is prepared and routed through RSP.

A principal investigator who is leaving the University may want to continue his or her sponsored project at a new institution. A request to transfer the unspent portion of grant or

contract must proceed through RSP, obtain the consent of the department head, school dean or center director, VPRSP and the President of the University.

800.00 INVENTIONS, PATENTS, AND INTELLECTUAL PROPERTY

As a leading research institution, Clark Atlanta University (CAU) through RSP encourages the faculty, staff, students, and volunteers to engage in research activities that lead to inventions and innovation, discoveries that are copyrightable or qualify for a trademark, technology transfer, and the development of intellectual property (IP). In addition, it is also the policy and responsibility of CAU and other affiliated organizations, such as a university-connected research corporation, to encourage the use of such discoveries and inventions for the good of the public and to provide equitable distribution between CAU and the investigator/inventor(s) of net licensing revenues resulting from the commercialization of novel discoveries and inventions in which the University is deemed to have an interest. The [CAU Intellectual Property Policy](#) should be consulted and reviewed for more detailed information concerning ownership, the rights and obligations of the University and inventor, the disclosure process, licensing, and distribution of net proceeds.

800.05 RESEARCH

The term research as used in this handbook shall include all research and creative work conducted in the course of an investigator's employment with CAU or other affiliated organizations such as a university-connected research corporation (including but not limited to the performance of a grant, contract or award made internally or by an extramural agency) or any research activity conducted with the use of CAU or other University-affiliated resources.

800.10 APPLICABILITY

The intellectual property policy applies to all discoveries, developments, inventions, or copyrightable works made by persons employed (either as full-time, part-time or temporary employees) by CAU or affiliated organizations, research scientists, visiting scientists, postdoctoral associates, students, volunteers, and other persons using University facilities and resources. See the [CAU Intellectual Property Policy](#) for more detailed information.

805.00 RESPONSIBILITY FOR UTILIZATION

The factors to be considered in establishing the responsibility for the utilization of any invention, discovery, or intellectual property as well as sharing of the proceeds are:

- The University sponsorship of the project leading to the invention, discovery, technology transfer or intellectual property;
- Significant use of the University's facilities, services or equipment in the discovery or production process, and
- Sponsorship of the project through the University by agencies or persons outside the University.

In the event that any one of these three factors exists, the University shall have an ownership interest in the invention, discovery, copyrights, trademarks, or other intellectual property. See the [CAU Intellectual Property Policy](#) for more information.

810.00 REQUIRED DISCLOSURES

Inventions, discoveries, copyrightable works, and other developments conceived or first reduced to practice in the furtherance of research conducted by University and personnel, as defined in Section 800.10 above, shall be promptly disclosed in writing to the Division of Research and Sponsored Programs. While the University remains committed to academic freedom and the free dissemination of ideas and knowledge, it is important to disclose potential inventions prior to such dissemination. The standard disclosure forms provided by the University (Invention Disclosure or Copyrightable Work Disclosure, and CAU Patent and Copyright Assignment form) should be used for this reporting process and may be obtained from the [IP section of the RSP website](#). Graduate students, research scientists, visiting scientists, and postdoctoral associates are responsible for disclosure if inventions, discoveries, copyrightable material and trademarks directly result from class work or programs of study, University sponsored research, or if significant University resources were utilized.

815.00 OWNERSHIP OF INTELLECTUAL PROPERTY

All rights to and interests in discoveries, developments, inventions, copyrightable works, or other intellectual property resulting from research or investigation or work conducted in the course of the author's, discoverer's or inventor's employment (including research scientists, postdoctoral associates, students, volunteers and trainees) with CAU or affiliated organizations (including but not limited to the performance of a grant, contract or award made internally or by an extramural agency) or with the significant use of University resources shall be the sole and exclusive property of CAU, and no other person or entity shall have any rights of ownership or interest in such discoveries, inventions, copyrightable works, or intellectual property. The University will not assert ownership of "scholarly works" except those activities and works that were institutionally required, commissioned, or performed or prepared as an expected and essential component of the position held, or involved significant use of University resources. The creator may not use University resources to commercialize or publish a "scholarly work" without a written agreement with the University. See the [CAU Intellectual Property Policy](#) for more detailed information.

820.00 DISTRIBUTION OF PROCEEDS

For all discoveries, inventions, copyrightable works, or developments for which CAU receives proceeds, CAU shall deduct all expenses incurred pertinent to the technology and not recovered previously for patent protection, copyright registration, or in pursuing commercialization of the intellectual property.

The remaining net proceeds shall be distributed as set forth below:

Cumulative Net Lifetime Proceeds	Inventor*	Division‡	University and/or Affiliated Org.
0-\$100K	50%	10%	40% (15% - RSP)
>\$100K	40%	15%	45% (15% - RSP)
*Inventor(s) retain the option of designating some fraction of these funds to support their laboratory research program.			
‡In the event the Division is dissolved, this fraction reverts to the University and/or University-affiliated organization.			

The University is authorized, subject to the approval of the President, to accept equity in lieu of cash in total or partial consideration for use of the University's intellectual property rights. Dividend income and income received from the sale of equity shall be divided in accordance with the distribution rules adopted by the University.

900.00 GLOSSARY

Acceptance - Before an offer can become a binding promise and result in a contract, it must be accepted. Acceptance can be made in oral or written form or by commencing performance on the contract. The acceptance must be identical with the offer and unconditional. This means that the acceptance must be positive and unambiguous and cannot change, add to or qualify the terms of the offer. Any alterations or conditions imposed on an offer create a counter-offer, which is basically a rejection of the original offer.

Allowable Costs - Determined by the Office of Management and Budget (OMB), the sponsor's requirements and/or University policy. [OMB Circular A-21](#) defines allowable costs as those that are:

- Reasonable
- Allocable to the project
- Given consistent treatment by use of generally accepted accounting principles
- Conform to any limitations or exclusions set forth by the sponsored agreement or OMB Circular A-21.

Amendment - See Modification.

Assurances - See Certifications.

Author - The person or persons responsible for creation of a copyrightable work.

Award - Funds provided from an external sponsor for support of a project. This term is used for both original award and supplements; it can mean monies or equipment.

Broad Agency Announcement - An announcement that is general in nature and that identifies areas of research interest, including criteria for selecting proposals, and soliciting the participation of all offerers capable of satisfying the government's needs.

Budget - An estimate of expenditures proposed to be incurred in the performance of a proposed statement of work.

Capital Equipment - An article of property that is not permanently attached to buildings or grounds and that has an acquisition cost of \$1,000 or more (exclusive of sales and/or use tax, freight, and installation) and a life expectancy of one year or more.

Certifications - a written statement signed by an authorized institutional representative that certifies the University is in compliance with federal regulations.

- *Conflict of Interest (Disclosure of Financial Interest)* - For NSF and PHS a certification requires an institutional representative to certify that the institution has implemented and is enforcing a written policy on conflicts of interest consistent with federal regulations, all financial disclosures required by the conflict of interest policy were made; and that conflicts of interests, if any, were, or prior to the institution's expenditure of any funds under the award, will be satisfactorily managed, reduced or eliminated in accordance with the institution's conflict of interest policy and/or disclosed to the agency (as required by the agency).
- *Debarment and Suspension* - A certification assuring the federal agency that the research personnel and the institution are not presently declared ineligible for receiving federal support, have not been convicted of fraud or a criminal offense in the performance of a federal award, are not in violation of federal or state statutes, are not presently indicted for criminal or civil charges and have not within a three-year period preceding the application had one or more federal, state or local transactions terminated for cause or default.
- *Delinquent Federal Debt* - A certification provided to the federal awarding agency that the applicant organization is not delinquent on the repayment of any federal debt.
- *Drug-Free Workplace* - A certification assuring the federal agency that the institution does and will continue to provide a drug-free workplace as required by the Drug-Free Workplace Act of 1988.
- *Lobbying* - A certification assuring the federal agency that no federal appropriated funds or any other nonfederal funds have been paid or will be paid for influencing any federal official or employee in connection with the awarding of any contract, grant or agreement.
- *Misconduct in Science* - A certification that the institution has established administrative policies dealing with and reporting possible misconduct in science and that it will comply with the policies and requirements as published in the federal agency's regulations.

Catalog of Federal Domestic Assistance (CFDA) Number -The identifying number to which a federal program is assigned in the Catalog of Federal Domestic Assistance (CFDA).

Classified Research - Research sponsored by a federal government entity that involves restrictions imposed by agreement or otherwise on the distribution or publication of the research findings or results following completion, for a specified period or for indefinite duration.

Cognizant Audit Agency - The office or staff that is designated to perform audits on behalf of the federal government for sponsored projects at a University. The cognizant audit agency for CAU is the Office of Naval Research.

Consortium - A consortium is two or more institutions working on the same research project, either funded directly by the supporting agency or one prime institution subcontracting/subgranting the funds to the other members of the consortium.

Continuation Proposal/Renewal Proposal - Additional funding increments for projects beyond the original grant period. See specific sponsor guidelines for submission requirements.

Contract - A contract is an agreement to acquire services that primarily benefit the sponsor. For an award to be considered a contract, it normally must contain all of the following elements:

- Detailed financial and legal requirements must be included with a specific statement of work to be performed.
- A specific set of deliverables and/or reports to the sponsor is required.
- Separate accounting procedures are required.
- Legally binding contract clauses must be included.
- Benefits of the project accrue first to the sponsor, then to the University, then to the nation.

Cooperative Agreement - A funding mechanism used by federal agencies when a program requires more agency involvement and restrictions than a grant but requires less agency supervision than a contract.

Co-Principal Investigator (Co-PI) - One investigator sharing equal responsibility as the PI for the direction of a research program.

Cost Reimbursement - A type of agreement whereby payments are based on actual allowable costs incurred in performance of the work.

Cost Sharing - The portion of project costs not borne by the sponsor. Acceptable cost sharing contributions must meet the following criteria:

- The contributions to be cost shared are verifiable by CAU records.
- The contributions to be cost shared are allowable, allocable, reasonable, and necessary for proper and efficient accomplishment of specific project or program objectives.

- Federal funds, directly or indirectly, are not used for cost sharing on other federally funded projects, except where authorized by federal statute to be used for cost sharing or matching.
- The contributions to be cost shared are not included as contributions for any other project.
- The contributions to be cost shared are directly identifiable with the sponsored project as outlined in the proposal budget and/or budget justification, and thus incorporated in the award notice.

Cumulative Net Lifetime Proceeds – Gross revenues or other payments received by the University from a licensed technology minus applicable patent filing fees, other legal fees associated with the technology, fees for patentability and marketability searches, fees arising out of litigation, legal advice or any other fees or costs directly attributable to the invention being licensed. F&A costs, overhead or other costs usually associated with operation of the University and not directly attributable to the invention shall not be deducted from gross revenues. See the [CAU Intellectual Property Policy](#) for more detailed information.

Direct Costs - Direct costs charged to sponsored agreements must be allowable, allocable, and reasonable. Those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. *Examples:* (1) compensation of employees for performance of work under the sponsored agreement, including related fringe benefit cost; (2) the costs of materials consumed or expended in the performance of the work; (3) other items of expense incurred for the sponsored agreement, provided such costs are consistently treated in like circumstances.

Division – Administrative subdivision, i.e., school or center, of the University that provided the environment in which the research program(s) of the inventor(s) is (are) conducted.

Donated Property - Property provided by an outside party for specific activities related to sponsored project and/or research activities of the University; title to the property passes to the University at essentially no cost.

Effort - The amount of time, usually expressed as a percentage of the total that a faculty member or other employee spends on a project.

Equipment - Generally, articles of nonexpendable tangible personal property having a useful life and an acquisition cost which meet or exceed the established thresholds for defining equipment. Equipment is not a replacement part or component returning a piece of equipment to its original condition. If a component increases the capability of the original equipment and has an acquisition cost that meets or exceeds the established equipment cost thresholds, it is considered a capital item.

Expanded Authorities - Policy implemented by some federal granting agencies which delegates certain prior approval authorities to grantee institutions. This delegation allows for internal University approval of administrative and spending actions, thus avoiding delays in project progress.

Extramural Funds - Funding for research, training or public service programs provided by federal or private sources outside the University.

Facilities and Administrative (F&A) Costs - Also referred to as indirect costs, overhead, overhead costs, or administrative costs. Facilities and administrative costs are actual costs incurred to conduct the normal business activities of an organization that cannot be readily identified with or directly charged to a specific project or activity. The normal activities of the University include instruction and departmental research, organized research, public service, and other institutional activities. F&A costs are real, auditable costs incurred by the University each time it accepts an award for a sponsored project. If the University does not collect full reimbursement for these costs, other University resources must be used to subsidize them. Negotiated, approved rates are to be used for all agreements, as allowable. Information on current F&A cost rates are available from the RSP website.

Federal Acquisition Regulations (FAR) - The Federal Acquisition Regulations System is established for the codification and publication of uniform policies and procedures for acquisition by all executive agencies. It consists of rules and regulations governing business with the Federal Government. These regulations govern all aspects of federal procurement.

Firm Fixed-Price (FFP) - A type of agreement whereby payment is not based on actual costs expended but upon a mutually agreed upon price.

Foreign Travel - Foreign travel includes travel outside of the United States and its territories and possessions (Guam, American Samoa, Puerto Rico, the Virgin Islands, and the Canal Zone) and Canada. A trip is considered foreign travel for all legs of the itinerary if the traveler does not return to his or her post prior to departure for a foreign destination.

Formal Proposal - Any proposal submitted by a University employee to an outside entity that may directly lead to an award. All formal proposals require an institutional endorsement by the VPRSP.

Full and Open Competition - The solicitation of bids from prospective suppliers which is used to assure that all responsible bidders are permitted to compete for the procurement.

General Purpose Equipment - Equipment that is not limited to research, scientific, or other technical activities. Examples of general purpose equipment include office equipment and furnishing, air-conditioning equipment, reproduction and printing equipment, motor vehicles, and automatic data processing equipment.

Gift - A unilateral transfer of money, property, or other assets to the recipient for the recipient's ownership and use by a donor who makes no claims on the recipient in connection with the gift. Gifts normally have the following characteristics:

- The statement of work allows the PD significant freedom to change emphases within the general area of work as the project progresses.
- No deliverables are involved.

- Separate accounting procedures are not required.
- Benefits of the project are to accrue to the nation and the world.
- Sponsor has no audit rights.
- No regulatory issues are involved, such as human subjects or animal care.

Grantee - A grantee is the recipient of a grant. When the University accepts a grant award, on behalf of an individual, it becomes the grantee.

Gross Income – Proceeds from the sale, lease, or licensing of intellectual property by the institution; dividends derived from equity received in consideration for the sale, lease, or licensing of intellectual property by the institution; or proceeds from the sale of equity received in consideration for the sale, lease, or licensing of intellectual property by the institution.

Human Subjects - A living individual about whom an investigator conducting research obtains:

- Data through intervention or interaction with the individual.
- Identifiable private information.

Indirect Costs - See Facilities and Administrative (F&A) Costs.

Informal Proposal - A short (generally 2-5 pages) description of the proposed project that does not involve a commitment of University resources or a signature on behalf of the University. An informal proposal may include a total cost estimate but does not include a budget and is not expected to result directly in an award. The purpose of an informal proposal is usually to inform and interest the potential sponsor enough to request a more detailed formal proposal. The informal proposal is sometimes called a letter proposal, mini-proposal, preliminary proposal, pre-application, or concept paper.

Informed Consent - The voluntary agreement obtained from a subject (or the subject's legally authorized representative) to participate in research or related activity, before participating in that activity. The consent must permit the individual (or legally authorized representative) to exercise free power of choice without undue inducement or any element of deceit, fraud, force, duress, or other form of coercion or constraint.

Infrastructure Support - As a requirement for accepting federal funding for research, the University must negotiate Facility and Administration Agreement with the Office of Naval Research. Facility and administration expenditures as defined by this agreement are referred to as infrastructure support.

In-Kind Contribution - A non-cash commitment (such as contributed effort, facilities use, or supplies) to share the costs of a sponsored project.

Institutional Authorized Officials – Individuals authorized by the Board of Trustees to sign grants, contracts, and agreements on behalf of CAU.

Institutional Review Board - A board or committee organized at the University to provide review at the institutional level for ethical concerns in research, such as laboratory animal care and the use of human subjects in research.

Intellectual Property (IP) – Intellectual property is a broad term that encompasses the various intangible products of the intellect of inventors. These include patents, trademarks, copyrights, trade secrets, know-how, and other proprietary concepts, including an invention, scientific or technological development, and even computer software and genetically engineered microorganisms. Intellectual property means inventions and works. See the [CAU Intellectual Property Policy](#) for more detailed information.

Intergovernmental Agreement (IGA) - An agreement whereby two or more public agencies of the state may contract with each other provided that such contracts are authorized by the governing bodies of each agency.

Invention – Any discovery, invention, new use or application, process, composition of matter, article of manufacture, know-how, design, model, technological development, or biological material.

Inventor – The person or persons responsible for conception of an idea or ideas leading to an invention. An individual or individuals who has (have) made a contribution to the conception and/or reduction to practice of an invention, discovery or development and who is (are) identified as such on the licensed patent, patent application or unpatented technology. In the case of a patent or patent application, this contribution must be applicable to at least one claim. In cases of joint inventorship, it is not necessary that each inventor make the same type or amount of contribution to the invention and it is not necessary that each inventor make some contribution of each claim. See the [CAU Intellectual Property Policy](#) for more detailed information.

Invitation to Bid - Written documents soliciting pricing and/or technical proposals to supply goods or services as specified in the requesting document. Correct use of Invitations to Bid constitutes full and open competition. See Request for Proposal (RFP).

Key Professional Personnel - Key professional personnel (or key personnel) are all individuals who participate in the scientific development or execution of the project. Typically, key personnel have a Ph.D., Ed.D., or M.D., but may also include the master's or baccalaureate level, provided they contribute in a substantive way to the research.

Letter of Inquiry - A letter of inquiry is initiated by an applicant to determine whether a proposed project is within a private agency's fundable program areas and to request agency policy and program information, as well as instructions and forms.

Letter of Intent - A letter of intent advises a funding agency that an application will be submitted in response to its solicitation. The letter may contain general program information, unofficial cost estimates, and a request for specific application guidelines, instructions and forms.

Loaned Equipment – Property provided by an outside party for use by the institution for sponsored project or research-related activities; title to the property does not pass to the University.

Lobbying Certification - See Certifications.

Major Project - A large, complex project that entails assembling and managing teams of investigators. They also require a significant amount of administrative effort to complete specifically identified requirements of the project. Examples per OMB Circular A-21 are:

- Large, complex programs such as General Clinical Research Centers, Primate Centers, Program Projects, environmental research centers, engineering research centers, and other grants and contracts that entail assembling and managing teams of investigators from a number of institutions.
- Projects which involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective clinical records studies).
- Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
- Projects whose principal focus is the preparation and production of manuals and large reports, books and monographs (excluding routine progress and technical reports).
- Projects that is geographically inaccessible to normal departmental administrative services, such as research vessels, radio astronomy projects, and other research field sites that are remote from campus.
- Individual projects requiring project-specific database management; individualized graphics or manuscript preparation; human or animal protocols; and multiple project-related investigator coordination and communications.

Matching Funds - A cash commitment to share the costs of a sponsored project. See also Cost Share.

Misconduct in Science Certification - See Certifications.

Modification - Any change made to an existing sponsored agreement.

Net Income – Gross income minus the direct costs associated with patent prosecution, copyright registration, commercialization, defense, maintenance, and administration of intellectual property.

No-Cost Extension (NCE) - Provides for an additional period of performance to accomplish project goals. Permission for NCE must be requested from the sponsor.

Overhead - See Facilities and Administrative (FAC or F&A) Costs.

Participant - A participant is an individual who receives services from a project or program funded by an award. Participants perform no work or services for the project or program other than for their own benefit. University employees may not be participants.

Participant Costs - Program Participants are the recipients of service or training provided at a workshop, conference, seminar, symposia or other short-term instructional or information-sharing activity funded by an external grant or award or the training beneficiaries of the project or program funded by an external grant or award. A participant is not involved in providing any deliverable to the University or a third party, or would not be terminated or replaced for failure to perform.

Participant Payments - costs used to pay program participant small stipends and possibly reimbursement of travel costs or other out-of-pocket costs incurred to support attendance at a workshop, conference, seminar, symposia or other short-term training or information sharing activity.

Personnel Action Form (PAF) - The document used to authorize effort for an individual to be charged to a specific project. PAF must be submitted to RSP any time there is a change in an employee's effort distribution on a grant.

Peer Review - A process utilized by some federal and private agencies, whereby committees of research investigators in the same area of research or with the necessary expertise (from other institutions) review and recommend applications to the funding agency.

Principal Investigator (PI)/Project Director (PD) - Typically, a faculty member who submitted a proposal that was accepted and funded by an external sponsor. The PI/PD has primary responsibility for technical compliance, completion of programmatic work, and fiscal stewardship of sponsor funds.

Program Income - Program income is gross income earned by a research grant recipient from the activities, part or all of which are borne as a direct cost by the grant. Examples are fees for services performed under the grant, rental or usage fees charged for use of equipment purchased with grant funds, third party patient reimbursements for hospital or medical services paid from the grant, funds generated by the sale of commodities, such as cell lines or research animals developed from or paid for from the grant, and patent or copyright royalties.

Proprietary Research - Research sponsored by nongovernmental entity or individual that involves restrictions on the distribution or publication of the research findings or results following completion, for a specified period or for indefinite duration.

Rebudgeting - Process by which funds available for spending are reallocated between budget categories to allow best use of funds to accomplish project goals.

Request for Applications (RFA) - Any resulting awards would normally be funded by a grant. The RFA instructions include the information necessary to complete the application and mailing instructions.

Request for Proposals (RFP) - An RFP contains specific instructions for technical and cost proposals, and usually include a sample contract with terms and conditions that need to be reviewed and approved prior to the submission of the proposal. The institutional

endorsement for this type of proposal is considered an official offer; therefore, it must meet certain requirements before it can be signed and submitted.

Scholarly works - include, but are not limited to, articles written for publication in academic journals, textbooks, works of art, musical compositions, and literary works. Theses and dissertations are not, for the purposes of this policy, scholarly works. Works by non faculty employees shall not, for the purposes of this policy, be considered scholarly works.

Scope of employment – Activities which have been assigned to an employee by his or her supervisor or which are performed during normal working hours or which fall within the employee’s job description.

Significant use – Utilization of Institution funds, personnel, facilities, equipment, materials or other resources resulting in a cost to the Institution (direct, F&A, or depreciative) of more than \$2,500 (in constant 2001 dollars).

Sole Source Acquisition - Issuing an award to a subcontractor/subgrantor without full and open competition. This may be done if an award is the result of collaboration (where the ideas, concepts, and methodology were developed by the two parties jointly). There are restrictions on the use of this means of procurement and documentation must show justification for using sole source acquisition.

Site Visit - An agency-initiated review of a proposed project conducted at the applicant's institution.

Special Purpose Equipment - Equipment which can be used only for research, scientific, or other technical activities.

Sponsor - An external funding source which enters into an agreement with the University to support research, instruction, public service or other sponsored activities. Sponsors include private businesses, corporations, foundations and other not-for-profit organizations, other universities, and federal, state and local governments.

Sponsored Project/Program Activity - A project/program supported by an external funding source under a mutually binding agreement that restricts the use of funds to the approved project/program and stipulates other conditions with which the University must comply. Sponsored projects/programs typically:

- are initiated by a formal proposal and award notice;
- are restricted to a particular purpose as described in the proposal;
- require technical and/or financial reports;
- entail other research-compliance and administrative requirements.

See the appendix for a more detailed description of sponsored project/program activities.

Subaward - An award of financial assistance in the form of money, or property in lieu of money, made under an award by a recipient to an eligible subrecipient or by a subrecipient to a lower tier subrecipient. The term includes financial assistance when provided by any legal

agreement, even if the agreement is called a contract, but does not include procurement of goods and services nor does it include any form of assistance which is excluded from the OMB Circular A-110 definition of "award" in paragraph (e).

Subcontract/Subgrant - An award issued under a prime contract, agreement, purchase order, or grant for the procurement of services or program-related tasks.

Subcontractor/Subgrantor - Any supplier, distributor, vendor, or firm that furnishes supplies or services to or for a prime contractor or another subcontractor/subgrantor.

Subrecipient - The legal entity to which a subaward is made and which is accountable to the recipient for the use of the funds provided.

Supplemental Proposal - Additional support requested to assure adequate completion of the original scope of work.

Works - Any copyrightable material, such as literary works; musical works, including any accompanying words; dramatic works, including any accompanying music; pantomimes and choreographic works; pictorial, graphic, and sculptural works; motion pictures and other audiovisual works; sound recordings; architectural works; computer software or databases; circuit diagrams; architectural and engineering drawings; and lectures.

1000.00 APPENDIX

Definition of Sponsored Program Activities

The University serves as the recipient of sponsored program funding. While faculty or staff may be the authors of proposals requesting funding, the University is the official recipient and custodian of the extramural funding and support. As such, the University accepts responsibility for oversight, compliance management and appropriate conduct of sponsored activities on behalf of the principal investigator or PD. It is imperative that the University maintains a centralized, coordinated approach to the review, approval, submission and management of all sponsored program activity. Review and approval processes must be clearly defined and established to provide the University with appropriate controls for compliance and sound management of all sponsored program activity.

Sponsored program activities are defined as those activities, sponsored whole or in part, by sources external to the University for which there is an expectation (implied or specifically stated) on the part of the sponsor for performance, deliverable(s) or outcome(s). Sponsored programs are generally conducted by faculty, but may be conducted by staff or members of the University administration. Sponsored programs are awarded through various mechanisms - grants, contracts, cooperative agreements, or other legally binding means of transfer.

Sponsored program activities may support instruction, research and/or public service activities. They are identifiable by the following characteristics. A program does not need to include all elements to be considered to be "sponsored."

- An investigator-initiated project that specifies proposals for research, training, or public service activities to an outside entity
- Inclusion or allowance of Facilities and Administrative Costs
- Percentage of faculty time on project, (may or may not be compensated by the sponsor)
- Expectation (implied or specifically stated) of performance, deliverable or outcome by the sponsor
- Defined time period for the work to be conducted
- Progress, technical, final reports or other deliverables are required, excluding stewardship reports on gifts
- The project involves disposition of property, whether tangible or intangible, that may result from the project (e.g. equipment, records, inventions, copyrights, or rights in data).
- Statement or expectation of a "quid pro quo" relationship between the University and the sponsor
- The proposed project binds the University to a specific description of the activity/work to be conducted sometimes known as a *Scope of Work*
- A Line Item budget is involved
- A financial report is required, invoices are required for cost reimbursement, and the budget/performance is subject to audit
- All government funds, exclusive of financial aid
- All corporate research contracts, subcontracts/subgrants or agreements
- Definition of how the funds may be spent and what conditions may apply to residual funds
- Use of University resources – equipment, space, students, etc. - mandate processing through RSP to determine classification.

The following further clarifies definitions relating to sponsored activities:

Grants

A type of financial assistance awarded to an organization for the conduct of research or other program as specified in an approved proposal. The proposal typically defines a scope of work or performance. The sponsor makes an award, which may be based upon a competitive review, and establishes terms and conditions for performance. These terms may be generally stated, as in many federal awards, or may specifically describe allowable and unallowable activities or costs. Unless prohibited by sponsor regulations, performance under grant awards may be modified to adjust to project conditions. Such modifications may be approved internally by the University or may require sponsor authorization. Grants may be awarded through simple contractual agreements, letters of authorization, payments of fees, or other similar mechanism. Their defining feature is that they are governed by specific rules or regulations pre-established by the sponsor, and that they provide for some flexibility in the conduct of the activity.

Contracts

A legally binding arrangement or performance agreement for carrying out a specific service or procuring a product that entails specific obligations for both sponsor and recipient. Contracts are a more restrictive mechanism for securing services than grants, and may specify penalties for non-performance. A **Fixed Cost or Fee for Service Agreement** is one in which one party pays the other party, a predetermined price, regardless of actual costs, for services rendered. A **Cost-Reimbursement Agreement** is one in which the sponsor pays for the full costs incurred in the conduct of the work up to an agreed-upon amount, and for which invoices containing back-up information of costs incurred are generally required. A **Percent Completion** contract is one in which the sponsor contracts for completion of specific tasks, and payment is made upon receipt and approval of a report or other deliverable.

Contracts may be awarded for research, assessment, specific work performance, instruction, training, or similar activities. Generally, contracts will define specific details of the legal relationship between the participating entities and will incorporate the description and cost of the work to be performed either as a legally binding attachment or embedded in the contract document. A purchase order may be a form of contract.

Matching Grants

Some sponsors require the applicant to demonstrate commitment to the proposed activity by providing funds in support of the overall project costs. Matching funds may be derived from institutional resources, either in-kind (donated time, space, equipment use, etc.) or cash, or may be generated from other entities (third party). Sometimes the principle investigator (faculty submitting the proposal who will do the work if funded) will include matching or cost sharing to enhance chances of being funded, even if the sponsor does not require matching. **All proposals that include a cost sharing component must be approved by the Vice President for Finance and Business Services and the Vice President for Research and Sponsored Programs.**

Cost-sharing is a major issue in federal awards. The federal government has issued specific guidance on matching funds and the responsibilities of recipients in accounting for these funds. Failure to comply may result in loss of revenue associated with the specifically funded project, or in general sanctions against the institution. The following are the three types of cost-sharing:

Mandatory – Required by the sponsor and specifically referenced in the proposal, budget or other submitted document. Must be accounted for in the institution's accounting system.

Voluntary Committed – Committed by the institution in the proposal, budget or other submitted document to enhance possibility of funding, but NOT required by the sponsor. Must be accounted for in the institution's accounting system. (Note: if a proposal is submitted with voluntary cost-sharing, and is subsequently awarded, the status of the cost-sharing converts to Mandatory.)

Voluntary Uncommitted: after the award is received, the University/PI provides more cost sharing than is promised or required. Example, a PI spends more time on the project than originally projected. Must be tracked and verified, but IS NOT entered into the institution's cost-sharing system.

Funds promised and or provided by third parties to a sponsored program must meet the same reporting requirements imposed on the institution. The recipient (University) is responsible for acquiring and maintaining third party matching documentation.

Challenge Grants

A grant that provides monies in response to monies from other sources, usually according to a formula. A challenge grant may, for example, offer two dollars for every one that is obtained from a fund drive. The grant usually has a fixed upper limit, and may have a challenge minimum below which no grant will be made. This form of grant is fairly common in the arts, humanities, and some other fields, but is less common in the sciences. A challenge grant differs from a matching grant in at least one important respect: the amount of money that the recipient organization realizes from a challenge grant may vary widely, depending upon how successful that organization is in meeting the challenge. Matching grants usually award a clearly defined amount and require that a specified sum be obtained before any award is made.

Cooperative Agreements

An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation, and anticipates having substantial involvement in research activities once the award has been made.

Non-teaching Consulting Services

Consulting as an agent of the University is defined as additional activity beyond duties assigned by the institution, professional in nature and based in the appropriate discipline for which the individual receives additional compensation during the contract year. Consultancy services include addressing the technical and professional needs of communities, groups, agencies, businesses and other entities outside the University. Consulting services are NOT sponsored programs unless the University is the direct recipient of funds, and liable for the conduct of the activity performed by the University employee. In this instance, it is essential that these contracts are managed as sponsored programs, in that they involve coordination of faculty time/effort reporting, and determination of appropriate overload policy interpretation.

Training/Workshops/Non-Credit Teaching

Proposals for conducting training/workshops/non-credit teaching functions are considered to be "sponsored programs" if they meet any of the above stated criteria. Proposals which contain workshops and/or training embedded in their overall scope may be reviewed by the responsible dean, at the discretion of the VPRSP. In addition, these activities are considered "sponsored programs" if:

- The sponsor provides a single payment in support of a collective activity (as opposed to fees charged to individuals to participate in such events)
- The sponsor is a federal or state entity
- The sponsor awards F&A/administrative costs as a part of the budget
- The activities are specifically academic in nature, as opposed to provision of auxiliary services (sports camps, etc.). Some sponsored programs will include training or workshops as part of the overall project activity. In these instances, the principal

investigator is the responsible party on behalf of the University, and coordinates with the appropriate dean in delivery.

- Matching funds are either required or promised
- Faculty time is devoted to the activity

Gifts

A flexible, irrevocable award of money, equipment, or other property provided by a donor with few or no conditions specified. Gifts may be provided to establish an endowment or to provide direct support for existing programs. Frequently, gifts are used to support developing programs for which other funding is not available. Gifts meet the determination of having no “quid pro quo” relationship with the University, and as such are handled by the Vice President for Institutional Advancement & University Relations.

A gift to an organization implies no responsibility to provide the donor a product, service, technical or scientific report(s) or intellectual property rights. The donor may specify the use of the funds (as in to a specific scholarship fund) or the gift may be unrestricted for use in meeting the needs identified by the recipient organization.

Research gifts – A gift for research generally must meet the following conditions:

- a. Funds are awarded irrevocably
- b. The donor does not impose restrictive contractual obligations
- c. There is no commitment of direct project personnel effort to accomplish the research
- d. The funds are designated for scholarly endeavors

A research gift may be considered a sponsored project pending discussions and coordination with Institutional Advancement & University Relations.

Note: *RSP serves as the first point of contact for faculty seeking external funds. The office will review project/program concepts with faculty and seek possible sources of support on their behalf. From time to time, concepts may be forwarded to the Vice President for Institutional Advancement & University Relations for consideration as a part of a larger comprehensive development opportunity.*

Endowments

A fund usually in the form of an income-generating investment, established to provide long-term support for faculty/research positions (e.g., Endowed Chair). Endowments generally are not considered to be “sponsored program activity.”

Internships

An externally supported opportunity for an individual (student or faculty member) to engage in an extended learning or research activity. If the University is the recipient of internship funds, and the funding mechanism contains specific details concerning the obligation of the institution and/or the intern, the activity is treated as a sponsored program and must be internally approved and submitted as such.

Congressional/Legislative Allocations

In certain circumstances, federal and/or state governing bodies may directly appropriate funds to the University for specific purposes. It is important that the purpose of these funds represents the intent of the funding entity. In the case of most federal and state appropriations, the most common conveyance mechanism is to attach these funds to an existing agency program, and to request a proposal describing how the University will utilize these in keeping with the general intent of that specific program's mandate. An award is then made to the University by the agency. In this circumstance, the federal and/or state regulations and restrictions applied to all recipients of funds under that agency program apply to the use of funds awarded to the University. For this reason, proposals requesting support under direct appropriations become sponsored programs so that they may be accounted for and managed properly.

NOTE: The Controller's Office will not establish a University account for any sponsored activity without the review and approval of Research and Sponsored Programs.

Sources:

Definition of Sponsored Agreements and Gifts,

<http://www.controller.vcu.edu/grants/gc-admin/gcadmin2008/G&CDefinitionofSponsoredAgreementsandGifts.htm>

Definition of Sponsored Activities,

<http://research.louisville.edu/policies/definitionsponsored.html>

Definition of Sponsored Programs,

<http://academics.georgiasouthern.edu/research/Definition%20of%20Sponsored%20Programs%209.15.03.doc>

Designating Funding as a Gift vs. Sponsored Program,

<http://research.louisville.edu/policies/designatingfunding.html>

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CAU PI Handbook-25feb10.doc

Clark Atlanta University
Clearance of Proposals to External Agencies for Funding of Research, Service, Instruction
and Academically-related Projects

Agency Type	Via Research and Sponsored Programs	Via Institutional Advancement and University Relations
Federal, State, and Local Governments	X	
Foreign Govts.	X	
Foreign/Private Foundations, Corporations (non contract) NGO's	Only research compliance-governed projects (see definitions below)	X
Schools, Colleges, Universities	X	Shared-Private Universities & pass-through from Private Agencies (i.e., non-government dollars)
Corp. Research, Training, and Service Contracts	X	X (See Definition Below)
Non-Federal Public Endowments, Foundations, Councils	X	
Learned Societies, Associations for Discipline	Only research compliance-governed projects (see definitions below)	X
Private Foundations	Only research compliance-governed projects (see definitions below)	X
Corporate Philanthropy		X
Individuals		X

Research compliance-governed projects are those in which some of the following may be proposed:

Research, scholarship, instruction, or any other activities specifically involving:

- Human subjects of research, including persons surveyed, treated, or examined, any child or person less than 18 years of age, any other person with a diminished decision-making capacity.
- Laboratory or field animals whether warm or cold-blooded, vertebrate or invertebrate.
- Any project in which there is an expectation of a deliverable or outcome by the sponsor in exchange for the funding, there are implied reporting requirements (excluding stewardship reports) associated with the activity, there is a statement of work that binds the University to specific activities, there is a percentage of faculty time assigned to the project (compensated or uncompensated) or there is an inclusion of Facilities and Administrative Costs.
- Any use of recombinant DNA molecules or other biohazardous material regardless of the security level.
- Any project designed to produce patentable discoveries and inventions or other intellectual property.

Definitions do not apply to funds received for student scholarships and fellowships, which may involve activities of the above-mentioned kinds conducted under the supervision of faculty, unless the activity is specifically required as a condition of acceptance of the scholarship or fellowship. See the preceding document for more detailed discussion of sponsored program, research compliance-governed activities.

Corporate Research and Training:

Does not include corporate grants in which an insignificant amount funds deliverable services (i.e., copies of scholarly papers, attendance at colloquia or seminars) or services primarily performed by students as part of a classroom assignment whose goal is instructional (i.e., student team performing a consultant-type study of a business problem).

AJC-17nov08