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CLARK ATLANTA UNIVERSITY

11.3 – Policies and Procedures for Sponsored Programs: The Principal Investigator’s Handbook



CLARK ATLANTA UNIVERSITY		
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Table of Contents

100.00	INTRODUCTION.....	5
100.05	ELIGIBILITY TO SUBMIT AS A PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR.....	5
200.00	DIVISION OF RESEARCH AND SPONSORED PROGRAMS (RSP).....	5
205.00	THE ORGANIZATION OF THE DIVISION OF RESEARCH AND SPONSORED PROGRAMS.....	6
210.00	RESEARCH AND SPONSORED PROGRAMS STAFF.....	6
210.05	VICE PRESIDENT FOR RESEARCH AND SPONSORED PROGRAMS.....	6
210.10	DIRECTOR, RESEARCH AND SPONSORED PROGRAMS.....	7
210.15	PREAWARD STAFF.....	7
210.20	POSTAWARD STAFF.....	7
210.25	ADMINISTRATIVE STAFF.....	8
215.00	RESEARCH COMMITTEES.....	8
215.05	RESEARCH ADVISORY COUNCIL.....	8
300.00	FUNDING SOURCES.....	9
400.00	PROPOSAL DEVELOPMENT.....	9
405.00	WHITE PAPER/CONCEPT PAPER.....	9
410.00	QUALIFICATIONS OF A PI.....	9
415.00	PROPOSAL CONTENT.....	10
415.05	COVER SHEET.....	10
415.10	CERTIFICATION PAGES.....	10
415.15	TABLE OF CONTENTS.....	10
415.20	PROJECT SUMMARY OR ABSTRACT.....	10
415.25	PROJECT DESCRIPTION.....	10
415.30	BUDGET AND BUDGET JUSTIFICATION.....	11
415.35	EVALUATION.....	11
415.40	BIOGRAPHICAL SKETCHES.....	11
415.45	REFERENCES.....	11
420.00	BUDGET DEVELOPMENT.....	11
420.05	MODULAR BUDGETS.....	12
425.00	DIRECT COSTS.....	12
425.05	SALARIES AND WAGES.....	12
425.10	SENIOR PERSONNEL COSTS.....	12
425.15	OTHER PERSONNEL COSTS.....	12
425.20	FRINGE BENEFITS.....	12
425.25	EQUIPMENT.....	13
425.30	TRAVEL.....	13
425.35	DOMESTIC TRAVEL.....	14
425.40	FOREIGN TRAVEL.....	14
425.45	PARTICIPANT SUPPORT COSTS.....	14
425.50	OTHER DIRECT COSTS.....	14
425.55	MATERIALS AND SUPPLIES.....	14
425.60	PUBLICATIONS AND PRINTING.....	14
425.65	SUBCONTRACTS/SUBGRANTS.....	14
425.70	SUBRECIPIENT MONITORING.....	15
425.75	CONSULTANT SERVICES.....	16
425.80	COMPUTER SERVICES.....	16
425.85	COMMUNICATION.....	16
425.90	REPAIRS AND MAINTENANCE.....	16
430.00	FACILITIES AND ADMINISTRATIVE (F&A) COSTS.....	16
430.05	SHARING RECOVERED F&A COSTS ON SPONSORED PROGRAMS.....	17
435.00	PROPOSAL ROUTING.....	17
440.00	PROPOSAL REVIEW, APPROVAL AND SUBMISSION.....	18

440.05	REVIEW BY DEPARTMENT HEAD/DIRECTOR	18
440.10	PROPOSAL REVIEW PANEL.....	19
440.15	REVIEW BY RESEARCH COMPLIANCE COMMITTEE	20
440.20	REVIEW BY DEAN.....	20
440.25	REVIEW BY RSP STAFF.....	20
440.30	CAU AUTHORIZATION	21
440.35	SUBMISSION TO AGENCY	21
500.00	RESEARCH COMPLIANCE COMMITTEES.....	21
505.00	INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE	22
510.00	HUMAN SUBJECTS COMMITTEE	22
515.00	BIOSAFETY COMMITTEE	24
520.00	CAU RADIATION SAFETY OFFICER.....	24
525.00	RESPONSIBLE CONDUCT OF RESEARCH (RCR)/RESEARCH INTEGRITY COMMITTEE	24
530.00	EXPORT CONTROL COMMITTEE.....	25
600.00	OFFICE OF MANAGEMENT AND BUDGET (OMB) CIRCULARS	25
605.00	OMB DEFINITIONS OF RESEARCH AND INSTRUCTION.....	26
605.05	OMB DEFINITION OF ORGANIZED RESEARCH.....	26
605.10	OMB DEFINITION OF INSTRUCTION	27
605.15	OMB DEFINITION OF OTHER SPONSORED ACTIVITIES	27
610.00	OMB DEFINITION OF UNALLOWABLE COSTS	27
615.00	OMB DEFINITION OF ALLOWABLE COSTS	28
620.00	COST ACCOUNTING STANDARDS	29
625.00	DISCLOSURE STATEMENTS.....	29
700.00	AWARD MANAGEMENT.....	29
700.05	PROPOSAL AWARD RECEIPT	30
700.10	NEGOTIATIONS	30
705.00	GRANT AND CONTRACT ACCOUNTING RESPONSIBILITIES	31
705.05	PRINCIPAL INVESTIGATOR.....	31
705.10	POSTAWARD STAFF.....	32
705.15	DEPARTMENT HEAD	32
705.20	DEAN/DIRECTOR	32
705.25	FINANCE AND BUSINESS SERVICES STAFF	33
705.30	VICE PRESIDENT FOR RESEARCH AND SPONSORED PROGRAMS.....	33
705.35	DIRECTOR, RESEARCH AND SPONSORED PROGRAMS.....	34
710.00	TIME AND EFFORT REPORTING SYSTEM	34
710.05	TIME AND EFFORT CERTIFICATION PROCEDURE.....	34
710.10	CORRECTING TIME AND EFFORT INACCURACIES.....	34
715.00	SPECIAL PURCHASING ARRANGEMENT	35
715.05	PROPERTY MANAGEMENT.....	35
720.00	CHANGES IN RESEARCH/TRAINING BUDGET	36
725.00	TECHNICAL RESEARCH AND TRAINING REPORTS.....	36
730.00	NOTICE OF AWARD.....	36
730.05	START UP CONFERENCE	37
730.10	BUDGET FORM 405.....	37
730.15	FUND NUMBERS.....	38
730.20	BUDGET REVISIONS.....	38
730.25	PRIOR APPROVAL.....	38
730.30	PERFORMANCE MONITORING.....	38
730.00	PROJECT TECHNICAL PERFORMANCE.....	39
730.40	PROJECT FISCAL MANAGMENT	39
730.45	ORGANIZATION DETAIL ACTIVITY REPORT	40
730.50	GRANT INCEPTION TO DATE REPORT.....	40
730.55	PROJECT FILES	40
730.60	RECORD RETENTION	41
735.00	ADMINISTRATIVE CLOSEOUT PROCESS.....	41

740.00	PROCEDURES AND PROCESSES	43
745.00	PERSONNEL ACTION FORM	43
750.00	SUPPLEMENTAL PAY FORM	43
755.00	STAFF REQUISITION FORM	44
760.00	CHANGE IN PAYROLL DISTRIBUTION	44
765.00	STUDENT WAGE PAYMENT FORM	44
770.00	STUDENT STIPEND FORM	45
775.00	STUDENT FINANCIAL AID ROSTER	45
780.00	PURCHASE REQUISITION	45
785.00	TRAVEL REQUISITION	46
790.00	COST TRANSFER	46
800.00	RESEARCH AND SPONSORED PROGRAMS POLICIES	46
805.00	DRUG FREE WORKPLACE	47
810.00	SUPPLEMENTAL PAY (SP)	47
815.00	FACULTY RELEASE TIME	47
820.00	TRAVEL	47
825.00	LEAVES	47
825.05	ANNUAL LEAVE	47
825.10	SICK LEAVE	48
830.00	NO COST EXTENSION	48
835.00	CARRYOVER FUNDS	48
840.00	TRANSFER OF GRANT OR CONTRACT	49
900.00	INVENTIONS, PATENTS, AND INTELLECTUAL PROPERTY	49
900.05	RESEARCH	49
900.10	APPLICABILITY	49
905.00	RESPONSIBILITY FOR UTILIZATION	50
910.00	REQUIRED DISCLOSURES	50
915.00	OWNERSHIP OF INTELLECTUAL PROPERTY	50
920.00	DISTRIBUTION OF PROCEEDS	51
1000.00	GLOSSARY	51
1005.00	APPENDIX	62

POLICIES AND PROCEDURES FOR SPONSORED PROGRAMS 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 Policies and Procedures Handbook seek to guide administrators, faculty and staff from the development of a research idea to the administration of an award. This Policies and Procedures Handbook answers questions and provide information on Federal regulations and policies, certifications and assurances, and intellectual property including patents and copyrights.

This Policies and Procedures Handbook also addresses 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.

For more in-depth discussion and details on various aspects of grants administration and policies related to sponsored program activities, Principal Investigators/Project Directors (PI) are required to review the [OMB Circulars](#) found on the [CAU Compliance Office website](#). 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.

All proposals which use the name and resources of CAU and which may result in an award to CAU must be reviewed and approved by the appropriate CAU officials and must adhere to CAU procedures for submitting a proposal, accepting an award and administering the project.

100.05 ELIGIBILITY TO SUBMIT AS A PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR

Full time faculty members are eligible to serve as a PI on sponsored projects. Within certain limitations other titles such as senior research faculty and research faculty are also eligible.

200.00 DIVISION OF RESEARCH AND SPONSORED PROGRAMS (RSP)

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. RSP works closely with the Office of Grants and Contracts Accounting (OGCA), the Compliance Office, the President and the Provost/Vice President for Academic Affairs to ensure strict adherence to all applicable laws and regulations pertaining to government funded programs. One of the major goals of RSP is to increase CAU's research capacity while strengthening the academic programs and infrastructure. CAU 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, PIs, and the administrative units of CAU. 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 CAU 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 CAU'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, lab safety and chemical hygiene coordinator, 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. RSP staff directory and organizational chart can be found on the [RSP website](#).

210.00 RESEARCH AND SPONSORED PROGRAMS STAFF

210.05 VICE PRESIDENT FOR RESEARCH AND SPONSORED PROGRAMS

The VPRSP is the Chief Research Officer of CAU responsible for developing and implementing the vision, direction and guidance of CAU's research enterprise, policy formulation, and oversight related to the research process and education/training.

The VPRSP promotes the creation of a CAU 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 CAU.

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 specific responsibilities are listed below:

- Review proposal content and budgets;
- Communicate with various federal agencies on program announcements, active grants, contracts and cooperative agreements;
- Provide 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;
- Manage sponsored accounts, including federal related accounts; and
- Identify funding sources to underwrite CAU's research objectives.

210.15 PREAWARD STAFF

The preaward staff serves as the primary interface between the PI and the awarding agency. The preaward staff is responsible for the overall management and administration for proposal development and submissions. The specific responsibilities are listed below:

- Identify identifying funding opportunities;
- Manage proposal development;
- Maintain a proposal submission and awards records management system;
- Monitoring of equipment purchased through federal grants for the equipment inventory process with the Office of General Accounting;
- Facilitate proposal/program development for new research initiatives;
- Maintain electronic pre-award database for tracking pending proposals and funded projects;
- Facilitate the development of the statement of work;
- Facilitate the generation of a cost proposal; and
- Assist with the negotiation of the terms and conditions of funding agreements.

210.20 POSTAWARD STAFF

The postaward staff serves as the primary interface between the PI, OCGA, 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:

- Inform PI, department head, and Dean or center director of the award;
- Review aspects of the award with PI (Start-up Conference);
- Prepare and distribute project briefs and authorize budget;
- Assist with funding changes;
- Ensure that project expenditures adhere to CAU 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 and PIs on closeout dates.

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. Additional responsibilities include processing reports, preparing documents, and coordinating meetings and other area activities.

215.00 RESEARCH COMMITTEES

Research at CAU has become an important part of the overall mission, goals, and objectives of CAU. To ensure that research operations are efficient and in compliance with Federal, state, and local regulations, several research compliance committees were established to advise RSP 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 Research Compliance Committees.

215.05 RESEARCH ADVISORY COUNCIL

The Research Advisory Council advises the VPRSP on various issues related to the research enterprise at CAU. The purpose of the Research Advisory Council is to assist RSP and CAU in developing realistic goals, strategic direction, and new research initiatives. The Research Advisory 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 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

CAU receives funding for research and sponsored programs from Federal agencies, corporations, small businesses, and private foundations. RSP assist potential PIs in the early stages of the proposal by identifying potential sponsors for the project. The PI may access funding information from www.grants.gov and the [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's information and use.

400.00 PROPOSAL DEVELOPMENT

All academic grants, contracts, and cooperative agreements are managed by the RSP. The writing of the proposal is the responsibility of the designated PI who will be responsible for the project upon award. PIs should review and consult proposal guidelines from the funding agency for each proposal. The proposal should be based on a well-conceived idea and clearly define the purpose, significance, objectives, methods, evaluation plan, and anticipated outcomes of the project.

405.00 WHITE PAPER/CONCEPT PAPER

PIs should engage in "informal" communication with agency technical representatives to explore the possibility of receiving the awarding agency support. Early dialogue with potential sponsors provides insight into the agency's research emphasis that could lead to competitive proposals. The White Paper/Concept Paper should have aggregate cost estimates rather than a detailed budget. White papers do not require campus endorsements; however, a copy should be provided to RSP for its files.

410.00 QUALIFICATIONS OF A PI

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 to be deemed competitive by external review panelists.

It must be evident that the PI has the ability and capacity to implement the proposed research project or activity. Some important components of qualified PIs are listed below:

- Earned degrees, dates, and institutions;
- Grants, contracts and cooperative agreements received;
- Employment status at CAU;
- Recent refereed publications and presentations with relevance to proposed project;
- Research interests and teaching experience.

415.00 PROPOSAL CONTENT

The elements of a proposal generally include cover sheet, certification pages, table of contents, project summary or abstract, project description, budget and budget justification, evaluation, biographical sketches, references, and appendices. The PI should use a proposal checklist relevant to the proposal request.

415.05 COVER SHEET

Cover sheets consist of the name and pertinent information about the applying institution, PIs name, name of the project, funds requested, project duration, name of institutional representative, address, telephone and fax numbers, e-mail, and signatories. Only the President or the VPRSP (or designee) may sign as the authorized representative of CAU on the cover sheet. The proposal preparation fact sheet found on the [RSP website](#), provides pertinent information about CAU for agency coversheets.

415.10 CERTIFICATION PAGES

Federal agencies require all PIs and Co-PIs to 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 CAU 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 CAU.

415.15 TABLE OF CONTENTS

The proposal should contain a table of contents and point to each major topic in the proposal, as well as important minor topics.

415.20 PROJECT SUMMARY OR ABSTRACT

The proposal must contain a project summary or a one-page abstract. 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 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 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.

415.25 PROJECT DESCRIPTION

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

- Measurable objectives for the period of the proposed work;
- 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; and
- Description of experimental methods and procedures.

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

415.30 BUDGET AND BUDGET JUSTIFICATION

The budget and budget justification should correlate with the objectives outlined in the project description and reflect the costs associated to implement the proposed project along with a justification for each line item within the budget. For more information on Budgets and Budget Justification, see OMB Circular A-110 Section 215.25(a).

415.35 EVALUATION

The purpose of an evaluative scheme (formative and summative) is to determine whether the objectives of proposed project have been met. Formative evaluations monitor the day to day implementation of the project. Summative evaluations determine the final outcome of the project.

415.40 BIOGRAPHICAL SKETCHES

The biographical sketch should contain information or documentation on expertise in a specific area. It should also contain the overall qualification of the PI to conduct the proposed research or training program. 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; and
- Research interests and teaching experiences.

415.45 REFERENCES

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

420.00 BUDGET DEVELOPMENT

Budgets consist of two cost categories: Direct Costs and Facilities and Administrative Costs (F&A). F&A costs were previously called indirect costs.

OMB Circular A-21, Section D 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. Where 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.

420.05 MODULAR BUDGETS

The National Institutes of Health (NIH) have instituted modular budgets for their Requests for Proposals. These budgets allow the PI to estimate direct costs in increments of \$25,000. If a modular budget is submitted, RSP requires a detailed budget to be submitted for internal review only.

425.00 DIRECT COSTS

Direct costs include salaries and wages, fringe benefits, equipment, travel, participant support, and other direct costs.

425.05 SALARIES AND WAGES

All personnel who devote time and effort to the project must be listed in the budget. The list should be in the following order: senior personnel, other personnel costs, and fringe benefits. Include titles, the percentage of time and effort to be committed to the project, description of the duties and responsibilities, base salaries, and the requested salary support for the budget period.

425.10 SENIOR PERSONNEL COSTS

Senior personnel include PIs, co-PIs, research faculty, 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. Salary support should not exceed 100% of effort across all sponsored projects, instruction and other CAU activities. Projects requiring course release, a reduced workload, or a workload reallocation for a faculty member must have the approval of the appropriate Department Chair, Dean, and Provost/Vice President for Academic Affairs.

425.15 OTHER PERSONNEL COSTS

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

425.20 FRINGE BENEFITS

The fringe benefit rate is utilized by CAU for full-time PIs, faculty, computer programmers, clerical/secretarial staff, technicians and other nonstudent employees. Fringe benefits

include social security (FICA), retirement, unemployment, workmen's compensation, and insurance. The fringe benefit for undergraduate and graduate students is 0%.

Consult the [RSP website](#) or Finance and Business Services to verify the current fringe benefits rate. Allocable and allowable fringe benefits consist of the items included in CAU's current F&A rate agreement. When a funding agency allows a higher rate than CAU rate, the higher rate may be charged. For more on Fringe Benefits, see OMB Circular A-21 Section J.10.f.

425.25 EQUIPMENT

Equipment at CAU is defined as an item of property that has an acquisition cost of \$5,000.00 or more with a service life of more than one year. Property and equipment are not subject to F&A costs. Equipment items valued at less than \$5,000.00 are considered expendable equipment and should be listed on the budget as supplies. Each piece of equipment must be itemized in the budget justification section. Property and equipment are not subject to F&A costs. For more on Equipment and Capital Expenditure, see OMB Circular A-21 Section J.18 or for definition of Equipment OMB Circular A-110 Section 215.2 (L).

OMB Circular A-21 Section J.18.a (2) defines equipment as an article of nonexpendable, tangible property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of the capitalization level established by the institution for financial statement purposes or \$5,000.

425.30 TRAVEL

Allowable travel must adhere to OMB Circular A-21 and CAU policy. It includes professional meetings, travel for consultation, field work, PI meetings, relevant workshops, and visits with directors and managers at Federal agencies. Agencies will generally pay for international (U.S. carrier restrictions should be checked) or domestic airfare, rental car, personal car, rail and/or bus if such travel is necessary to the project and is justified and approved. There must be a correlation between the implementation of the project and the purpose of requesting travel funds. The budget justification should list each trip along with the following:

- Number of travelers;
- Destination;
- Reason for travel;
- Number of days;
- Number of nights lodging required;
- Cost per day of meals and incidentals;
- Mode of transportation and cost;
- Cost of ground transportation; and
- Registration fees, etc.

The two broad travel categories recognized at CAU are domestic and foreign. Domestic and foreign travel should be separately identified and budgeted.

425.35 DOMESTIC TRAVEL

Travel within the continental United States and Canada 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](#).

425.40 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. On federally funded projects, all foreign travel, including that which is cost shared, should utilize US flag air-carriers whenever possible. Some awarding agencies require that foreign travel be approved in advance, even when the award includes funds for foreign travel.

425.45 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 applied to participant support costs.

425.50 OTHER DIRECT COSTS

Other direct costs include materials and supplies, publications, subcontracts/subgrants, consultants, computer services, all communication costs, repair, and maintenance. For more information on Other Direct Costs, see OMB Circular A-21, Section J.

425.55 MATERIALS AND SUPPLIES

Materials and supplies less than \$5,000 are considered expendable items with a useful life of less than one year. The budget should indicate the type of expendable materials and supplies that are required, with estimated costs. All materials and supplies must be in compliance with OMB Circular A-21. For more information on Material and Supplies, see OMB Circular A-21 Section J-31 and for the Definition of Supplies, see OMB Circular A-110 Section 215.2 (hh).

425.60 PUBLICATIONS AND PRINTING

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

425.65 SUBCONTRACTS/SUBGRANTS

Collaboratives or research partnerships may include coordinated activities with another institution. The intent to enter in such an arrangement should be fully disclosed and detailed in the proposal. These arrangements may result in a subcontract/subgrant. A subcontract, subagreement or subgrant is an agreement between CAU and a third party to transfer a portion of CAU's responsibilities on a sponsored project to a third party. Budgets and budget explanations for each subcontract or subagreement should be included in the budget proposal. Subcontracts and subagreements are not executed until the grant or contract has been awarded. Subcontracts and subagreements are processed through

RSP. The PI must provide the following information in order for a subcontract or subagreement to be issued:

- Detailed statement of work;
- Deadlines for technical reports, financial reports, patent, and royalty forms, etc.;
- Detailed budget;
- Current curricula vitae or biographical sketches for all senior project personnel;
- Contact information including name, address and telephone number of the individual authorized to obligate the subgrantee or subcontractor;
- An explanation of the tasks to be completed by all project personnel; and
- Proposal materials, including bibliographies, tables, charts, illustrations, reprints, and other supplementary materials.

If the subcontractor is an institution of higher education, a hospital or other non-profit organization, the provisions of OMB Circular A-110 will apply to the subcontractor. If the subcontractor is a state or local government the provisions of regulations implementing the grants management common rule, "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments," published at 53 FR 8034 (3/11/88) will apply.

425.70 SUBRECIPIENT MONITORING

Throughout the life of the subcontract, the PI is required to ensure that all deliverables are met. CAU undertakes the following stewardship activities for monitoring the programmatic and financial status of its subrecipients to ensure compliance with regulations stipulated in awards:

- Require the subrecipient to certify its compliance with the OMB Circular A-133 and certify compliance with any non-federal regulations applicable to the award;
- Instruct subrecipients who receive \$500,000 or more from Federal sources to provide certification detailing the status of their single audit report per year throughout the life of the subagreement as it relates to the prime award(s) from CAU or a complete copy of its A-133 Audit along with any Corrective Action Plans;
- Request documentation, if not subject to OMB Circular A-133, in the form of audit reports and financial statements that substantiate the certification of compliance with the applicable OMB Circular;
- Establish the right to require the subrecipient to permit independent auditors access to its records and financial statements to comply with OMB Circular A-133 during normal business hours; and
- Ensure that the subrecipient is compliant with the conflict of interest policies of federal sponsor.

If the PI encounters problems with the subrecipient, they are to notify RSP in writing. The subrecipient is given five (5) working days to inform CAU of their strategies for achieving compliance. If the problems cannot be resolved the subcontract is terminated in accordance with the terms in the subcontractual agreement.

425.75 CONSULTANT SERVICES

Consultant Services consists of services rendered by non-CAU employees. Services include consultant and professional services, honoraria, speaker fees, and may include travel expenses of the consultant. Consultants may be budgeted when the project calls for defined expertise for a fixed period of time and for activities where on-campus expertise does not exist. PIs are expected to budget the need for consultants in grant applications or contract proposals. The proposal should include the following:

- Consultant name;
- Description of services to be provided;
- Number of days of anticipated consultation;
- Expected rate of compensation, travel, per diem, etc.;
- Curriculum vita for the consultant; and
- Termination provisions.

The PI is responsible for ensuring the following conditions are met when considering a consultant:

- The services the consultant provides are essential to the project;
- A selection process has been employed to secure the best-qualified consultant available to perform the required tasks;
- The consultant fee is commensurate with the qualifications of the consultant and the nature of the services rendered; and
- The consultant meets the requirement of an independent contractor as defined by the Internal Revenue Service.

For more information on Consultants, see OMB Circular A-21 Section J. 37 and the CAU Purchasing Policies and Procedures: [www.cau.edu/purchasing/Purchasing Policy.pdf](http://www.cau.edu/purchasing/Purchasing%20Policy.pdf)

425.80 COMPUTER SERVICES

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

425.85 COMMUNICATION

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

425.90 REPAIRS AND MAINTENANCE

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

430.00 FACILITIES AND ADMINISTRATIVE (F&A) COSTS

OMB Circular A-21 defines F&A Costs as expenses that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity.

F&A costs are the associated costs that are incurred in conducting research and sponsored program activity at an educational institution. F&A costs are not profit but are real costs to CAU to support sponsored activities. Examples include building maintenance and operation, utilities, libraries, computer services and other facilities, payroll, accounting, purchasing, research administration, departmental administration, personnel services, and general administration.

OMB Circular A-21, Section F.6.b.(2) reads as follows: The salaries of administrative and clerical staff should normally be treated as F&A costs. Direct charging of these costs may be appropriate where a major project or activity explicitly budgets for administrative or clerical services and individuals involved can be specifically identified with the project or activity. "Major project" is defined as a project that requires an extensive amount of administrative or clerical support, which is significantly greater than the routine level of such services provided by academic departments.

At CAU, 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. 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. Contact RSP for 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, see OMB Circular A-21 Sections E and F.

430.05 SHARING RECOVERED F&A COSTS ON SPONSORED PROGRAMS

In order to provide incentives to faculty, staff and academic units to seek extramurally sponsored grants and contracts, the University will allocate F&A costs earned on research projects in accordance with a Recovered F&A Distribution Plan. A portion of the recovered F&A Costs will be allocated to the PI/school/department annually based on the prior year's recovered F&A costs for that project. F&A Costs are to be used to enhance the sponsored program activity of the units. Each unit is required to establish specific plans for using these funds. These funds may be used for new equipment, equipment repair, building repairs and renovations, and other activities to support the growth of research activities. The funds may not be used for supplemental salary payments or internal consulting payments.

435.00 PROPOSAL ROUTING

All proposals must be routed through RSP for official submission to an awarding agency. 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 (5) working days prior to submission deadline.

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

- Cost sharing contributions and percentages;
- Appendix materials allowable;
- Maximum budget allowed;
- Special budget forms and application checklist;
- Table of contents requirements;
- F&A costs 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; and
- Project duration (number of years of support allowed by sponsor).

440.00 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 CAU's proposal review, approval and submission process are explained in the sections below.

- Proposal routing form;
- Agency cover sheet;
- Complete final proposal (See Section 415.00 for proposal contents);
- Agency certification and assurance forms;
- Approval of appropriate compliance committees, if required; and
- Letters of CAU 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.

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

440.05 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 department head/director is charged with directing the PI's

efforts at CAU, 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;
- Verification that all costs, including F&A costs, are appropriately budgeted, are in compliance with the policies of CAU and the sponsor, and that cost sharing funds are available when indicated in the proposal; and
- 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).

440.10 PROPOSAL REVIEW PANEL

The purpose of the PRP is to ensure that all proposals have merit and are well written. Each department of a school or center of CAU should establish its own PRP. Smaller schools or centers may wish to have only one PRP. When the proposal has been approved within the department/center, the proposal should be forwarded to a Proposal Review Panel (PRP) within the department or unit. 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. The role of the PRP is described below.

A competitive proposal addresses a specific need. It has a novel idea and is innovative, forward-looking and creative. In a research proposal, the idea must emanate from good science, education, engineering or technology. A competitive proposal is a document with sponsor-oriented structure. It should describe and speak to the "WHAT," "WHY," "HOW," "WHEN," and "WHO." Each PRP member should answer the following questions to address the intellectual merit and broader impact of the proposal:

- How important is the proposed project 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 project?
- Is there sufficient access to resources?
- How well does the proposed project advance discovery and understanding while promoting teaching, training and learning?
- How well does the proposed project 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 project to society?
- What is the potential for commercialization and creation of intellectual property assets?

440.15 REVIEW BY RESEARCH COMPLIANCE COMMITTEE

If applicable, proposals are forwarded by the department head/director to the appropriate research compliance committee for review. Approval must be obtained from a Research Compliance Committee before the proposal is forwarded to the VPRSP for signature. The review by the Research Compliance Committee 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 responsibilities of all CAU Research Compliance Committees.

440.20 REVIEW BY DEAN

After proposals 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 aligned with the goals and objectives of the school. If the Dean rejects a proposal, members of the Proposal Review Panel would serve as mediators between the PI and Dean.

440.25 REVIEW BY RSP STAFF

A proposal packet with the required information and signatures of the department head and Dean 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 440.00.

RSP staff review ensures that all proposals are in compliance with CAU 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. RSP review focuses on the following:

- Abstract - More reviewers read the abstract than the proposal itself. Great care should be given to its preparation;
- 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; and
- Document Details - 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.

440.30 CAU AUTHORIZATION

All proposals must be signed by an official authorized to sign on behalf of CAU. The signature of the authorized official indicates CAU's endorsement of, and commitment to, the project. The VPRSP is the authorized institutional official for CAU. This authorization certifies compliance with federal regulations and represents pre-acceptance of terms and conditions of the award.

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

440.35 SUBMISSION TO AGENCY

Once a proposal has been signed by the VPRSP, it is ready for submission to the agency. It is the responsibility of the PI to duplicate and mail proposals. The number of copies of a proposal required by agencies varies. In addition to the original to be submitted to the sponsor, one copy is required for the official CAU file maintained by RSP. 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.
- A proposal will not be considered if submitted after the agency deadline.

440.40 ELECTRONIC SUBMISSION OF PROPOSALS

Electronically submitted proposals are subject to the same CAU review and approval process as paper proposals. Proposals should not be transmitted to the sponsor until the CAU 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 COMMITTEES

The Research Compliance Coordinator of RSP is responsible for coordinating the Animal Care and Use Committee; Human Subjects Committee; Biosafety Committee; Radiation Safety Subcommittee; Responsible Conduct of Research/Research Integrity Committee; and Export Control Committee. The Research Compliance Committee members are recommended by the Director of RSP to the VPRSP. For Compliance issues involving OMB

Circulars [A-21](#), [A-110](#) and [A-133](#), see section 600.00. Additional details and forms can be obtained at RSP website www.cau.edu/research.

505.00 INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE

Federal regulations require that institutions using animals as research subjects must carefully monitor animal care and use. CAU 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 CAU. 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 has a representative to this committee that serves as the liaison for CAU faculty and scientists. A local committee was formed to assist in the training effort and to review protocols before submission to the AUC IACUC. The functions of the AUC IACUC 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.

It is the responsibility of the CAU representative to the Morehouse School of Medicine Animal Care and Use Committee to oversee and evaluate CAU'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 AUC IACUC Committee membership is broadly composed of diverse individuals from the community and schools in the AUC. A link to the Committee and its schedule, composition, and forms is on RSP website.

510.00 HUMAN SUBJECTS COMMITTEE

CAU adheres to [45 CFR 46, Protection of Human Subjects](#), as amended by federal policy, effective June 23, 2005. These Federal regulations require CAU 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 Subjects Committee. Expedited review procedures may be 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; and
- 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 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, CAU or its agents from liability for negligence ([45 CFR 46.16](#)).

The Human Subjects Committee shall prepare and maintain adequate documentation of committee activities, including the following, as referenced in [45 CFR 46, Protection of Human Subjects](#):

- 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); and
- 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), Department of Health and Human Services (DHHS); and
- 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.

According to the Office of Human Research Protection (OHRP), Department of Health and Human Services (DHHS), 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 CAU. The Human Subjects Committee at CAU 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.

515.00 BIOSAFETY COMMITTEE

CAU 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 CAU'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 CAU's Biosafety Officer. The Biosafety Committee is required to conduct at least two workshops per annum (Fall and Spring semesters). Meetings are scheduled as needed. A Biosafety Manual has been developed and can be accessed through the [RSP website](#).

520.00 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 CAU, consist of a local CAU Radiation Safety Representative, who is CAU's liaison to the Atlanta CAU 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 Representative and the Laboratory Safety and Chemical Hygiene 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 Representative is conducts and/or coordinates with the AUC Radiation Safety Committee at least two workshops per annum (Fall and Spring semesters) on radiation safety, storage, monitoring, and disposal.

525.00 RESPONSIBLE CONDUCT OF RESEARCH (RCR)/RESEARCH INTEGRITY COMMITTEE

To ensure research at CAU is conducted effectively, objectively and without improper influence or the appearance of improper influence, the RCR/Research Integrity Committee was 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 CAU's Research Integrity Officer and administers CAU'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, students, as well as personnel working in the laboratories of the PIs who receive funds from the National Science Foundation (NSF) or the National Institutes of Health (NIH) are required to take the RCR Certification training found at www.citiprogram.org. More information on this topic and to review CAU's policy on Responding to Misconduct in Research can be found on the [RSP website](#).

530.00 EXPORT CONTROL COMMITTEE

It is the responsibility of the Export Control Committee to ensure that everyone at CAU understand the possible impact of laws regulating the release of equipment, technology technical data, technical services, commodities, software and computer code to foreign destinations and foreign persons. All CAU employees must be aware that providing these items to foreign destinations or foreign persons may result in violation of federal regulations.

Although most of the work that CAU undertakes is excluded from regulations, certain technologies and commodities may not be shared freely with all foreign persons. Such foreign persons may include: graduate students, research assistants, post-doctorate students, visitors, colleagues at meetings and symposia and contractors or partners in research projects.

The Chair of the Export Control Committee serves as the Export Control Officer. This individual determines if the activities are subject to the export control regulations and obtains the necessary approvals.

600.00 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.

605.00 OMB DEFINITIONS OF RESEARCH AND INSTRUCTION

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

605.05 OMB DEFINITION OF ORGANIZED RESEARCH

Organized research means all research and development activities of CAU 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.

- **CAU RESEARCH**

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

605.10 OMB DEFINITION OF INSTRUCTION

Instruction involves the teaching and training activities of CAU. 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, CAU 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 CAU'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 CAU. For all practical purposes, departmental research at CAU is designed to train students in the methods of research, and the ways in which scientists work and solve problems.

605.15 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.

605.20 OMB DEFINITION OF OTHER INSTITUTIONAL ACTIVITIES

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

610.00 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 CAU's premises;
- Commencement and Convocation Costs;
- CAU 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 CAU's Materials or Worksmanship, 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 CAU;
- Severance Costs in Excess of CAU'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

615.00 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 CAU, in proportions that can be approximated through use of reasonable methods.
 - It is necessary to the overall operation of CAU 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 CAU is responsible for ensuring that costs charged to a sponsored agreement are allowable, allocable and reasonable under these cost principles
 - Internal Controls: CAU'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.

620.00 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

625.00 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.

700.00 AWARD MANAGEMENT

Grants are awarded to the CAU to conduct basic and applied research or other sponsored program activities from federal agencies and private foundations. Contracts are

agreements between CAU and the sponsor to provide a service or deliver a product (project deliverables). Management of sponsored agreements is a collaboration between the PI and CAU. The PI is responsible for the management of the funded award and conducts the project activities to meet project goals and objectives, while adhering to awarding agency guidelines and CAU policies and procedures. CAU and the PI are legally responsible to the awarding agency for the performance of the funded activities.

700.05 PROPOSAL AWARD RECEIPT

An award to CAU from a sponsoring agency is a binding agreement that obligates CAU to a contractual commitment. This commitment comes as a formal notification from the funder: letter agreement, notice of award (NOA), grant agreement.

RSP, Finance and Business Services, or the Office of the President receives official notification of the acceptance or rejection of funding proposals. The official repository of award notifications is RSP. 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 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. The President, Provost, or VPRSP officially binds agreements with the University. RSP sends the appropriate documents to OGCA in Finance and Business Services for fiscal processing.

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

CAU 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. No commitments to personnel or subcontracts/subawards should be made prior to receipt of official award documentation.

When there is a delay in the receipt of the formal binding agreement with the funding agency, a short delay will impede the progress of the project. The PI may request pre-authorized spending through RSP. The Vice Presidents for RSP and OGCA can authorize and establish pre-spending through temporary fund accounts

700.10 NEGOTIATIONS

RSP negotiates the type of contract, terms, conditions, and financial arrangements including the budget, while the PI 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 to ensure that any change in project scope is also reviewed in terms of cost arrangement and other contractual aspects with specific attention to the duration and performance of the proposed grant activities.

RSP is the official negotiator involving the budget, implementation, and interpretation of CAU's policy. It is mutually beneficial for the PI and CAU to work together to develop strategies and options in negotiating. 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.

705.00 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. The PI performs the technical aspects of the award, while RSP and OGCA staff members handle the financial aspects of the grant or contract. 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.

705.05 PRINCIPAL INVESTIGATOR

The PI is responsible for the successful implementation of the project. The PI must:

- Work with RSP to obtain an official University fund 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 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.

705.10 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.

- 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.

705.15 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 CAU's Time and Effort policy.

705.20 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 CAU policies and assume project administrative responsibilities, and
- Review and authorize appropriate forms for payroll authorizations, new hires, purchases, and other project related expenses.

705.25 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; and
- 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.

705.30 VICE PRESIDENT FOR RESEARCH AND SPONSORED PROGRAMS

The VPRSP is the Chief Research Officer of CAU. RSP is the unit responsible for research administration at CAU. The major postaward responsibilities for the VPRSP include the following:

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

705.35 DIRECTOR, RESEARCH AND SPONSORED PROGRAMS

The Director of RSP 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 who they are to contact in RSP for specific information, the Director will assist the PI in contacting appropriate RSP staff member.

710.00 TIME AND EFFORT REPORTING SYSTEM

Federal agencies, as well as CAU, 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.

CAU is required by OMB Circular A-21 to monitor and report time and effort for all employees (including students who are supported in part or fully by federal funds). The PI must review charges posted for salaries on a monthly basis to ensure effort reporting is accurate. This monitoring process ensures that total effort on a project or across multiple projects does not exceed 100% of an individual's time and that the faculty member's effort does not conflict with and is reasonable within the confines of teaching responsibilities as defined in the contractual agreement with CAU.

710.05 TIME AND EFFORT CERTIFICATION PROCEDURE

CAU's official document for certifying time and effort for all CAU 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 Vice President to all employees of CAU. 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 cannot 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.

OGCA conducts Time and Effort Certification three (3) times per year associated with the academic terms of the University. The Fall Term certification covers the period September through December, the Spring Term certification covers the period January through May and the Summer Term certification covers the period June through August. Notification is sent to all employees via a university-wide broadcast e-mail from the Provost just prior to the beginning of the certification process. The certification is conducted for a period of thirty (30) days from the date of the notification.

710.10 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.

If an employee identifies a discrepancy during the certification process, a Change in Payroll Distribution form should be submitted within five (5) days of identifying the discrepancy. The PI informs OGCA of any discrepancies, using the payroll redistribution form, within five (5) days of review. A master log of the individuals whose form indicates that some or all of their pay was from a federally related award is maintained in OGCA. The log is reviewed after each certification period to determine who has not completed the process. Those who have not done so are notified via e-mail by OCGA to complete the process within fourteen (14) days. If the process is not completed within fourteen (14) days of the date of the second notice, notification is sent to the Dean or supervisor of the employee, the PI, the VPRSP, the Provost and the Chief Compliance Officer for further action. All certification documentation is maintained in OGCA in accordance with CAU's record retention policy.

715.00 SPECIAL PURCHASING ARRANGEMENT

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 CAU.

- **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 CAU.

- **SOLE SOURCE PROCUREMENT**

PIs 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; and
- 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.

715.05 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, CAU in consultation with the PIs are required to make annual inventory reports to the federal agencies. CAU 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 CAU-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.

720.00 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 Circulars A-21 and A-110 under certain conditions, permit small changes in budget categories not to exceed 10%. 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. RSP staff will assist the PI in making a formal request to the sponsor for major budgetary changes. RSP will submit all requests for budgetary changes through Budget Revision Forms to OGCA when notified by sponsor that permission is granted.

725.00 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 OMB Circular A-110. A copy of all reports must be forwarded to RSP for review and approval prior to submittal to the funding agency.

730.00 NOTICE OF AWARD

The following is a list of what the PI and RSP should look for in the Notice of Award:

- **Period of Performance.** These dates may not coincide with the dates of the total project period.
- **Name of the PI.** This individual is responsible for conducting the project in accordance with CAU policies and awarding agency requirements.
- **Dollars Committed and/or Obligated.** Not all project funds may be released at the beginning of the project but may be obligated incrementally. The awarding agency is under no legal obligation to pay obligated dollars.
- **Future Year Commitments.** These funds are contingent on availability and on satisfactory progress on the project. Use these amounts for planning purposes.
- **Cost Sharing.** CAU's contribution of its own resources to the project. Accounting and reporting on these costs is a formal requirement for CAU.
- **Accounting and Reporting Obligations.** All awards require technical and financial reports. Some awards require patent and property reports.
- **Deliverables.** CAU must deliver specified work products to the awarding agency.
- **Payment to CAU.** Detailed specification of how CAU will be funded or reimbursed by the awarding agency.

- **Special Terms and Conditions.** Conditions which may specify things as key personnel, limitations on availability or use of funds, need for prior approvals, and additional oversight by the awarding agency.

730.05 START UP CONFERENCE

Once a fully executed agreement is received from RSP, a letter and a copy of the Notice of Award is sent to the PI to inform them of the award and to schedule a start-up conference within two-weeks. The items for discussion at the start-up conference include, but are not limited to:

- Project information such as grant/contract performance and reporting periods, awarding status, etc.
- Technical and administrative contacts (names, e-mail addresses, telephone and fax numbers).
- Review and accountability for special agreement provisions such as security, nondisclosure, limitation of funds/cost, key personnel, approvals required for release of information, purchase of equipment, travel, use of consultants or subcontractors, and patent considerations.
- Deliverable requirements including periodic, technical, cost and patent reports.
- Identification of the individual responsible for each report.
- Special invoicing requirements, if applicable.
- Processing of special requests (i.e. no-cost extensions).
- Preparation of original budgets (Form 405) and or budget revision forms if applicable.

Attendees at the start-up conference must include the PI, OCGA, RSP Postaward Administration, and any personnel desired by the PI. Forms documenting that the conference has taken place and that the PI is aware of all terms and conditions of the award will be signed and a copy placed in the RSP project files.

Expenditures pertaining to sponsored projects are recorded in CAU's accounting system and are considered temporary restricted fund activity. The following apply to the use of restricted funds:

- A.** The funds must be spent in accordance with the terms and conditions of the award, the awarding agency and the policies and procedures of CAU.
- B.** The expenditures are restricted to the terms and conditions of the award for effective project execution.
- C.** All expenditures from externally awarded funds must be approved by the PI.

730.10 BUDGET FORM 405

During the start-up conference, the PI is required to complete Budget Form 405 for submission to OCGA. CAU budget numbers will not be assigned nor will expenditures be allowed until this form is completed. The approved detailed agency budget should be used as the basis for developing the Form 405. The budget must be approved by RSP Postaward Administration and OCGA. Additionally, the PI should do the following:

- Initiate job descriptions and announcements for new hires, securing the proper approvals;
- Revise PAFs for existing employees to reflect new time and effort; and
- Complete PAFs for new hires.

730.15 FUND NUMBERS

OGCA assigns a distinct identifying fund number for each sponsored program in CAU's financial system. OGCA notifies RSP and the PI via e-mail of the account number. Expenditure reports are available online and OGCA provides paper copies on request. Online access is granted and activated by the Office of Information Technology and Communications (OITC) for the PI and program manager. The PI must keep sufficient internal records to control expenditures.

730.20 BUDGET REVISIONS

If there are revisions, including the addition of incremental funding to the project's approved budget, a Budget Revision form must be completed and submitted to RSP along with an explanation and/or justification for any changes. Some revisions may require agency approval prior to implementation. Budget Revision are submitted to OGCA for entry into the financial system.

730.25 PRIOR APPROVAL

According to OMB Circular A-110, Section 215.25.(b), recipients are required to report deviations from budget and program plans, and request prior approvals for budget and program plan revisions. Approval is required in writing by the awarding agency for any significant changes to the scope of work, project timetable, time and effort of key personnel.

In addition, prior approvals by the VPRSP and Vice President for Finance and Business Services are required as stipulated in an award agreement.

730.30 PERFORMANCE MONITORING

Grants, cooperative agreements and contracts are effective only for the period specified in the agreement. The PIs must complete the work, including deliverables, during the effective period for the institution's invoices to be honored. Therefore, it is essential that the PI monitors the work schedule and budgets to complete the project on time and within budget.

The PI and OGCA must adhere to the grant/contract/agreement terms and conditions that apply to billing schedules and to the preparation and submission of invoices and other financial reports. It is the responsibility of the PI to request monthly expenditure reports to reconcile project accounts with OGCA. The PI is responsible for submitting all deliverables as specified in the award document.

730.00 PROJECT TECHNICAL PERFORMANCE

The PI is responsible for the conduct of the project/program activities in accordance with the awarding agency's approved scope of work and terms and conditions of the award. This includes hiring, assigning duties, evaluating, terminating project staff, monitoring subawardees performance on the project, and scheduling the project activities.

The PI is responsible for the timely completion and submission of required technical reports to the awarding agency and for communicating with the technical officer concerning the conduct of the work and any necessary modifications. RSP will notify PIs thirty (30) days prior to the due date of the technical reports. The Department Chair must review technical reports prior to submission to the awarding agency. RSP will send a second notice within five (5) business days to any PI whose technical reports are overdue. PIs who have technical reports overdue will be prohibited from processing PAFs, supplemental pay forms, requisitions, and continuation proposals until the reporting requirement is satisfied. The Department Chairs and respective Deans, VPRSP, OGCA, and the Chief Compliance Officer will be notified of these compliance issues.

According to OMB Circular A-110, Section 215.51.(d) when required, performance reports shall contain, brief information on each of the following:

- (1) A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both.
- (2) Reasons why established goals were not met, if appropriate.
- (3) Other pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

Paper copies of technical reports, must be forwarded to RSP for proper distribution to the awarding agency's designee. PIs who are required to submit electronic copies of technical reports by e-mail must include RSP in the routing or provide evidence of timely submission (i.e. cover letter or awarding agency generated confirmation of receipt). For more on Technical Report Requirements, see OMB Circular A-110, Section 215.51.

730.40 PROJECT FISCAL MANAGEMENT

The PI is responsible for complying with all financial terms and conditions of the award. This includes ensuring that costs are correctly charged to the PI's restricted account according to the awarding agency's approved project budget and the terms and conditions of the award. Expenditures charged to the account must be directly related to the project, must be allowable under the terms and conditions of the award, and there must be sufficient funds in the grant. Questions concerning the allowability of costs should be directed to RSP prior to incurring the cost. The PI is responsible for all costs charged to the project.

RSP monitors projects to ensure that issues presented by the awarding agency regarding agreement obligations (i.e., timely submission of all deliverables, reports and claims) are called to the attention of the appropriate CAU officials in accordance with the severity of the issues.

A copy of financial reports is forwarded to the PI. If there are discrepancies in the amounts reported, the PI must contact OGCA for review and corrections. The PI is required to review expenditure reports on a monthly basis so that discrepancies will be corrected by OGCA prior to the submission of financial reports. Sixty days (60) prior to the end date of a sponsored project, OCGA requires a pre-closeout meeting with the PI to review grant expenditures before the final report is submitted. For more on Financial Reporting, see OMB Circular A-110, Section 215.52.

730.45 ORGANIZATION DETAIL ACTIVITY REPORT

The Organization Detail Activity Report (ODTA) is a fiscal year report that reflects the details of all transactions that have occurred for any given fiscal year during the life of the award.

- The report pertinent information about transactions: the date the transaction was posted, the type (i.e., payroll item, budget entry, invoice payment, journal entry, etc.), the document number, the description or name of the vendor and the amount of the transaction.
- The report will also give information relative to purchase orders: the purchase order number, payment transactions against the purchase order and any outstanding purchase orders not yet paid.

730.50 GRANT INCEPTION TO DATE REPORT

The Banner Grant Inception-to-Date Report (GITD) reflects the total budget awarded to date, the cumulative expenditures that have been incurred on a sponsored project from its inception, any encumbrances not paid, and the available balances per line item. This information can be obtained through any desired date on all awards except for awards that were established prior to July 1, 2000.

The reports are available online or the OGCA can provide electronic copies when required by the PI. It is the responsibility of the PI to review the report on a monthly basis to ensure expenditures reflected are accurate and to report/follow-up on any discrepancies.

730.55 PROJECT FILES

RSP maintains a centralized system to house all pertinent information on all externally funded awards. Once a proposal is funded and a fully executed copy of the grant agreement or notice of award is received from RSP, an electronic project file is established and made available through CAU's Banner Document Management System (BMDS).

Both the RSP e-File and CAU's BDMs maintain files by fund number and contain the following information:

- Notice of Award (NOA), Letters of Agreement/ Memoranda of Understanding (MOU);
- Budget Information;
- Proposal Documents;
- Technical Documents (financial and programmatic reports, published articles, etc. provided by the PI);

- Subcontracts awarded by CAU, if applicable;
- All Other Support Documents (Transactions, Correspondences, Amendments, Modifications, Etc.); and
- Close-out Documents; if applicable

730.60 RECORD RETENTION

CAU retains and makes available all documentation pertaining to all sponsored projects for three (3) years from the date of acceptance of all closeout documentation by the awarding agency. The records will be retained for a longer period of time, if required, for litigation purposes. If any audit is started prior to the expiration of the three (3) year period, the records will be retained until the audit findings involving the records have been resolved and final action taken.

Additionally, PIs are required to retain project files for three (3) years from the date of acceptance of all closeout documentation by the awarding agency. The PI files include the proposal, notice of award, award amendments, requisitions, PAFs, time and effort reports, interim reports, e-mails, and other written correspondence.

735.00 ADMINISTRATIVE CLOSEOUT PROCESS

Award agreement provisions and/or agency regulations establish closeout requirements. The PI, RSP, and OGCA collaborate to closeout grants, contracts and cooperative agreements. Fulfillment of RSP's project closeout responsibilities begins with a monthly review of the current list of active awards generated by RSP.

PIs must be prepared to submit a final technical report no later than ninety (90) days following the expiration or termination of an award. Negligence by the PI may substantially impact CAU's and PI's ability to receive additional support from the awarding agency. It could also result in a loss of payment to CAU for costs already incurred. Such losses may become a liability chargeable to the department and/or school, and may result in severe disciplinary action.

In addition to the technical reports, other reports may be required relating to inventions, patents, property and financial results. For more on Closeout Procedures, see OMB Circular A-110, Section 215.71.

735.05 PRE-CLOSE OUT LETTER

A Pre-Closeout Letter is sent to the PI sixty (60) days prior to the expiration of an award requiring the PI to schedule a meeting with OGCA to review the status of the award that is ending. The letter provides summary information relating to the award amount, the cumulative expenditures as of the date of the letter, any outstanding encumbrances and the accounts receivable balance (i.e. outstanding invoice payments). The letter also indicates when the final report and/or invoice are due to the awarding agency. If the PI fails to schedule and meet with OGCA within twenty (20) days of the date of the notice, the OGCA will notify RSP, the Vice President for Finance and Business Services, the VPRSP, Chief Compliance Office, the Academic Dean, and the Provost. This notification will be sent ten

(10) days prior to the end date of the project. After all outstanding issues are resolved the final report/invoice is submitted with total expenditure amounts as reflected in the general ledger at the end date of the award.

735.10 CLOSE OUT LETTER

A closeout letter is sent to the PI ninety (90) days prior to the effective date of completion. If the PI determines that additional time is needed to complete the project research, the PI must request a no-cost extension in writing from RSP. CAU policy requires that all final technical reports be submitted ten (10) days prior to the awarding agency's due date. The CCO will be notified when the final report is sent to the awarding agency. Required reports may include the following:

- Final Technical Report (Prepared by PI).
- Final Property Report (Prepared by Accounting/Property Management).
- Submission of Final Financial Reports and/or Invoices (Prepared by OGCA).
- Final Patent Report (Prepared by RSP).
- Final Contractor's Assignment of Refunds, Rebates, Credits, and Other Amounts (Prepared by OGCA).
- Final Contractor's Release (Prepared by the OGCA).

In the event final technical reports are not received ten (10) days prior to the awarding agency's due date, a letter is sent to the PI and the academic Dean stating that the required reports have not been submitted to either RSP or the awarding agency. If the report is not submitted, on receipt of the notification, the matter will be brought to the attention of the Department Chair, Dean, VPRSP, Provost/Vice President for Academic Affairs and the Chief Compliance Officer.

735.15 CHANGE OF PI

The awarding agency must be advised and permission obtained before a new PI may be designated. If a PI for some reason can no longer serve, the PI must consult with the School Dean regarding a replacement. The Dean in collaboration RSP will make the final determination. If the PI is also the Dean, the request should bear the endorsement of the VPRSP and Provost/Vice President for Academic Affairs.

If the award is a multi-project award with an advisory committee or external board, the advisory committee or external board will make a recommendation to the Provost/Vice President for Academic Affairs. A request to an awarding agency for designation of a new PI should state the reason for the change and include the curriculum vita of the PI-designate.

735.20 LEAVES (PERSONAL, SABBATICAL, TERMINATION, RESIGNATION, ETC.)

When a PI requests extended leave or notifies CAU, the Dean or Department Chair will notify RSP in writing thirty (30) days prior to the first day of the leave granted or taken for a continuous period of ninety (90) days or more. This will allow time for the awarding

agency to make decisions regarding the replacement PI and to ensure that all reports are submitted and current.

735.25 TRANSFER OF A GRANT OR CONTRACT TO ANOTHER INSTITUTION

Steps may be initiated to transfer the grant or contract with the approval of the Department Chair, Dean, VPRSP, and Provost/Vice President for Academic Affairs. If approved, the requests for transfers must be submitted to RSP for processing. The transfer may be subject to certain conditions to be negotiated between the institutions.

Awarding Agencies do not automatically grant transfers of grant or contract awards. Permission must be obtained from the awarding agency for such transfers. Nominated PIs must be approved by the agency.

735.30 TRANSFER OF A GRANT OR CONTRACT FROM ANOTHER INSTITUTION

A newly appointed faculty member from another institution may wish to transfer a sponsored project to CAU. Such a transfer requires the other institution's approval in addition to the approval of the awarding agency. A new proposal (or the revised original) with new budgetary information must be processed through RSP prior to submission to the awarding agency.

740.00 PROCEDURES AND PROCESSES

Monitoring sponsored projects involves processing various CAU forms that affect the spending and subsequent payment of funds awarded on sponsored projects. The submission of these forms either initiates an expense or corrects an expense that has already occurred. The various forms listed in the following sections are not intended to be all inclusive and may be updated or revised periodically due to changes that occur in OGCA or CAU processes and procedures.

745.00 PERSONNEL ACTION FORM

A Personnel Action Form (PAF) is required by CAU to employ any individual that will be compensated. This form is initiated by the PI. The PI should ensure that the position for which he or she is hiring is in the approved budget and that funds are available before submitting the form to the OGCA for processing. The PI should also follow the guidelines established by Human Resources (HR) pertaining to salary and classification of the desired position at the proposal stage. PAFs must be signed by all appropriate individuals prior to submission to the OGCA.

PAFs should be submitted by the deadline dates established by HR as published on CAU's website. The Personnel Action Form is available online on CAU's website at www.cau.edu/gen_info/hr/PAF2.pdf.

750.00 SUPPLEMENTAL PAY FORM

According to OMB Circular A-21, Section J.10.c.(1)(d), changes to base salary may only occur because of the assignment of additional duties and may only be charged to federal programs in accordance with approval of the awarding agency.

A Supplemental Pay Form (SPF) is required when an employee receives additional compensation for work performed outside of normal responsibilities as defined by HR. Supportive documentation and/or written justification must accompany the request for supplemental pay and proper approvals must be obtained before the request is granted and before any additional work has begun.

Supplemental Pay Forms should be submitted by the deadline dates established by HR as published on CAU's website. The Supplemental Pay Form is available online on CAU's website at http://www.cau.edu/gen_info/hr/SuppPayForm.doc.

755.00 STAFF REQUISITION FORM

CAU policy requires that a Staff Requisition Form be submitted when a vacancy exists for either a new position or a replacement. This is required prior to submitting a PAF to HR. See the HR Policies and Procedures for further details at http://www.cau.edu/HR_Policies_Procedures.aspx.

The PI should ensure that the position has been approved and funded by the awarding agency. The form must be signed by all appropriate individuals before submitting to OGCA for processing. OGCA forwards the approved requisition to HR for advertising the position on CAU's website. The Staff Requisition Form is available online on CAU's website at http://www.cau.edu/gen_info/hr/Requisition.doc

760.00 CHANGE IN PAYROLL DISTRIBUTION

A Change in Payroll Distribution form must be submitted whenever reallocating or reclassifying salary from the original or intended distribution of pay. These changes require written justification and supporting documentation along with appropriate signatures and approvals before submission to OGCA. All payroll reclassifications must be done no later than sixty (60) days of the original occurrence of expense or transaction. After review and approval, OGCA forwards the form to the Payroll Office to effect the change requested.

765.00 STUDENT WAGE PAYMENT FORM

A Student Wage Payment Form is initiated by the PI. This form is required to employ students enrolled at CAU who will be compensated from a restricted award. The PI should ensure that hiring students has been approved by the awarding agency and that the funds are available before submitting the form to OGCA for processing. The PI should also follow the guidelines established by HR pertaining to the hourly wage rate and classification of the student. The Student Wage Payment Form must be signed by all appropriate individuals (including the student) prior to submission to OGCA.

Student Wage Forms should be submitted by the deadline dates established by HR as published on CAU's website. Time sheets documenting actual hours worked during a specified pay period, signed by the student and the PI are required to be submitted to the Payroll Office by the deadline dates in order to be paid. Time sheets submitted late are paid on the next pay date. The Student Wage Payment Form is available online on CAU's website at http://www.cau.edu/gen_info/hr/StudWagePayForm.doc.

770.00 STUDENT STIPEND FORM

A Student Stipend Form must be submitted when a student will be paid an amount, as determined by the PI, for a span of time that is not associated with an hourly wage or the completion of a time sheet. The PI should determine the student's eligibility to receive a stipend based on the specific scope or statement of work of his or her award and ensure that funds are budgeted. The Stipend Form must be signed by all appropriate individuals including the student prior to submission to the OGCA.

Student Stipend Forms should be submitted by the deadline dates established by HR as published on CAU's website. The Student Stipend Form is available online on CAU's website at http://www.cau.edu/gen_info/hr/StudStipPayForm.doc.

775.00 STUDENT FINANCIAL AID ROSTER

A Student Financial Aid Roster must be submitted whenever tuition and fees, scholarships and fellowships, book support and/or room and board are being paid on a student's behalf from a restricted award. The PI should determine the student's eligibility to receive such support based on the specifications in the award agreement and also ensure that funds are budgeted. The Financial Aid Roster may be submitted for a single student or a group of students and is initiated and signed by the PI. The Financial Aid Office will only accept rosters approved by the OGCA on restricted awards that bear the original signature of the PI. Copies and faxes are not accepted.

780.00 PURCHASE REQUISITION

A purchase requisition must be submitted to procure goods and services as needed, approved and budgeted on restricted awards. All purchases must adhere to the purchasing policies and procedures established by CAU and published by the Purchasing Department. A purchase order is CAU's official document of commitment to pay for goods and services. Procurement of goods and services should not be obtained prior to the issuance of the purchase order. All requests must be submitted on a requisition form with all supporting documentation attached and signed by the PI and any other signature authority established by a department and/or CAU prior to submission to RSP for processing.

RSP reviews purchase requisition for reasonableness, allocability and allowability in accordance with OMB Circular A-21 and the approved budget of the award. The budget narrative/justification that was submitted with the proposal and approval identifies the goods and services intended for the fulfillment of the scope of work to be done. For more on Purchasing, see OMB Circular A-110, Sections 215.43 and 215.44 for detailed requirements.

Requisition forms can be obtained from the Purchasing Department. If the requisition is to a vendor which has not been previously utilized by CAU, a Vendor Information Packet must also be submitted with the requisition. The Vendor Information Packet is available on the Purchasing Department's link on CAU's website at <http://www.cau.edu/purchasing/default.html>.

785.00 TRAVEL REQUISITION

A travel requisition must be submitted for requesting an advance of funds or approval for travel for staff, faculty or students to attend conferences, seminars, workshops, etc. This applies to domestic or foreign travel as approved and budgeted in the award agreement. The travel requisition must be signed by the traveler and the PI prior to submission to RSP for processing. All persons traveling on official CAU business must adhere to the travel policies and procedures established by CAU and published by the Purchasing Department. Requests for advances should be made at least fourteen (14) days prior to the date of travel. Any advances received for travel must be reconciled by OGCA within seven (7) days after returning from travel. All supporting documentation must be provided. If the advance is not reconciled within thirty (30) days, the amount of the advance, plus any other expenses paid on the traveler's behalf, will be deducted from the traveler's payroll check. CAU Travel Guidelines are published on CAU's website at <http://www.cau.edu/purchasing/TravelGuidelines.pdf>.

790.00 COST TRANSFER

Cost transfers are warranted when a discrepancy has been identified in expenditures and should be corrected. Costs allocable to a particular agreement may not be shifted to other agreements to meet deficiencies caused by overruns or other fund considerations. Transfers must be supported by documentation that contains an explanation of "how" and "why" the error occurred. An explanation that states "to correct error" or "to transfer to correct project" is insufficient justification.

Cost transfers are required to be made in a timely manner. When a discrepancy is identified the PI must contact OCGA to obtain assistance to resolve the discrepancy. Cost transfers relating to payroll discrepancies are done via the submission of a Change in Payroll Distribution form. All cost transfers are initiated and signed by the PI. Requests for Cost Transfers must be submitted to OGCA no later than sixty (60) days after the original occurrence of the expense or transaction.

The effects of cost transfers are captured in financial reports and invoices submitted to the awarding agency. Frequent errors in the recording of costs may indicate the need to review the accounting system and/or internal controls and are subject to audit. Cost transfer requests are prepared and entered via a journal voucher form by OGCA and posted to the general ledger by General Accounting. For more on Cost Transfers, see OMB Circular A-110, Section 215.25.(f).

800.00 RESEARCH AND SPONSORED PROGRAMS POLICIES

Research, training and other creative activities are vital components of CAU'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. Through sponsored programs, faculty, staff, and students develop professionally, enhance CAU's

research resources, strengthen the academic programs, and provide for student participation and public service.

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

805.00 DRUG FREE WORKPLACE

CAU is committed to maintaining a work environment free from illegal drugs and drug abuse. In addition to its own Drug Abuse Policy, CAU 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. CAU is also required to notify the federal contracting agency after learning of any employee's criminal drug conviction in the workplace.

810.00 SUPPLEMENTAL PAY (SP)

Supplemental Pay (SP) for PIs, who are conducting research and training projects, is discouraged, and in most cases, prohibited when federal funds are involved. PIs should request release time from teaching or other assignments 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.

815.00 FACULTY RELEASE TIME

Faculty release time for potential PIs is discussed at the departmental level with the Department Head during the preliminary stages of developing the proposal. If the proposal 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 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.

820.00 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.

825.00 LEAVES

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

825.05 ANNUAL LEAVE

Annual leave is only applicable to employees working 25 hours or more per week. CAU 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.

825.10 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.

830.00 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 number of months needed to complete the project and justification for the extension should be submitted to RSP in writing for review. RSP Postaward Administration will submit a written request to the appropriate awarding agency for approval.

The PI 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.

OMB Circular A-110, Sections 215.25.e.2.(i).(ii) (iii) states that Federal awarding agencies may be authorized to initiate a one-time extension of the expiration date of the award of up to 12 months unless one or more of the following conditions apply. For one-time extensions, the recipient must notify the awarding agency in writing with the supporting reasons and revised expiration date at least 10 days before the expiration date specified in the award. This one-time extension may not be exercised merely for the purpose of using unobligated balances. If one of the following conditions applies the no-cost extension will not be granted:

- (i) The terms and conditions of award prohibit the extensions
- (ii) The extension requires additional Federal funds
- (iii) The extension involves any change in the approved objectives or scope of the project

835.00 CARRYOVER FUNDS

Sponsor policies vary in their handling of unobligated funds at the end of the budget period. PIs working under multi-year awards should check with the sponsor(s) to avoid potential issues. Requests for the carryover funds are routed through RSP to the sponsor, explaining why funds are unobligated and how they will be expended during the next budget period.

840.00 TRANSFER OF GRANT OR CONTRACT

A faculty member coming from another institution may wish to transfer a sponsored project to CAU. 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 PI who is leaving CAU may want to continue his or her sponsored project at a new institution. A request to transfer the unobligated portion of grant or contract must proceed through RSP and obtain the consent of the department head, school Dean or center director, VPRSP and the President of CAU.

900.00 INVENTIONS, PATENTS, AND INTELLECTUAL PROPERTY

As a leading research institution, 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 CAU-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 CAU 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 CAU and inventor, the disclosure process, licensing, and distribution of net proceeds.

900.05 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 CAU-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 CAU-affiliated resources.

900.10 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 CAU facilities and resources. See the [CAU Intellectual Property Policy](#) for more detailed information.

905.00 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:

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

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

910.00 REQUIRED DISCLOSURES

Inventions, discoveries, copyrightable works, and other developments conceived or first reduced to practice in the furtherance of research conducted by CAU and personnel, as defined in Section 900.10 above, shall be promptly disclosed in writing to the Division of Research and Sponsored Programs. While CAU 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 CAU (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 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, CAU sponsored research, or if significant CAU resources were utilized.

915.00 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 CAU 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. CAU 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 CAU resources. The creator may not use CAU resources to commercialize or publish a "scholarly work" without a written agreement with CAU. See the [CAU Intellectual Property Policy](#) for more detailed information.

920.00 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‡	CAU 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 CAU and/or CAU-affiliated organization.			

CAU is authorized, subject to the approval of the President, to accept equity in lieu of cash in total or partial consideration for use of CAU'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 CAU.

1000.00 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 CAU 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.

Budget Period - The dates assigned by the awarding agency during which time funds may be expended.

Capital Equipment - An article of property that is not permanently attached to buildings or grounds and that has an acquisition cost of \$5,000 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 CAU is in compliance with federal regulations.

- **Conflict of 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; 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.
- **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 CAU.

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 - 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 CAU, 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 CAU 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 CAU 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 CAU that provides the environment in which the research programs of the inventors are conducted.

Donated Property - Property provided by an outside party for specific activities related to sponsored project and/or research activities of CAU; title to the property passes to CAU 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 CAU 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 CAU.

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 CAU include instruction and departmental research, organized research, public service, and other institutional activities. F&A costs are real, auditable costs incurred by CAU each time it accepts an award for a sponsored project. Negotiated, approved rates are to be used for all agreements, as allowable. Information on current F&A cost rates are available from 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.

Financial Conflict of Interest (FCOI) –A disclosure of significant financial interest (SFI) with respect to the investigator and the investigator’s spouse and dependent children if:

1. The value of any remuneration received from an entity within the 12 months preceding the disclosure and the value of any equity interests of the date of the disclosure when aggregated, exceed \$5,000;
2. Any equity in a non-publicly-traded company;
3. Intellectual property rights on receipt of income from those rights.

Disclosures of SFIs are reviewed to determine whether they are related to a PIs NSF/NIH sponsored research and whether that creates and FCOI with the research.

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 CAU 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 - The recipient of a grant. When CAU 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, organs, tissues, or bodily fluids of humans about whom an investigator conducting research obtains:

- Data through intervention or interaction.
- 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 CAU resources or a signature on behalf of CAU. 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, CAU 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 CAU 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 CAU.

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. CAU 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 CAU 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 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 CAU 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 CAU 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.

1005.00 APPENDIX

DEFINITION OF SPONSORED PROGRAM ACTIVITIES

CAU serves as the recipient of sponsored program funding. While faculty or staff may be the authors of proposals requesting funding, CAU is the official recipient and custodian of the extramural funding and support. CAU accepts responsibility for oversight, compliance management and appropriate conduct of sponsored activities on behalf of the PI. It is imperative that CAU 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 CAU 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 CAU for which there is an expectation (implied or specifically stated) on the part of the sponsor for performance, deliverable or outcomes. Sponsored programs are generally conducted by faculty, but may be conducted by staff or members of CAU 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 CAU and the sponsor.
- The proposed project binds CAU 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 CAU 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 CAU or may require sponsor authorization. Grants may be awarded through 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. Contracts 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). The PI may 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 VPRSP.

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 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, CAU/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. CAU 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 CAU 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 CAU. Consulting services are NOT sponsored programs unless CAU is the direct recipient of funds, and liable for the conduct of the activity performed by CAU employee. 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 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 CAU, 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. 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 CAU, and as such are handled by the Vice President for Institutional Advancement & CAU Relations.

A gift to an organization implies no responsibility to provide the donor a product, service, technical or scientific reports or intellectual property rights. The donor may specify the use of the funds (specific scholarship, etc.) 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; and
- D.** The funds are designated for scholarly endeavors.

A research gift may be considered a sponsored project pending discussions and coordination with Institutional Advancement & CAU 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. Concepts may be forwarded to the Vice President for Institutional Advancement & CAU 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 CAU 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 CAU 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 CAU will utilize these in keeping with the general intent of that specific program's mandate. An award is then made to CAU 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 CAU. 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 CAU account for any sponsored activity without the review and approval of Research and Sponsored Programs.

SOURCES:

1. Definition of Sponsored Agreements and Gifts,
<http://www.controller.vcu.edu/grants/gc-admin/gcadmin2008/G&CDefinitionofSponsoredAgreementsandGifts.htm>
2. Definition of Sponsored Activities,
<http://research.louisville.edu/policies/definitionsponsored.html>
3. Definition of Sponsored Programs,
<http://academics.georgiasouthern.edu/research/Definition%20of%20Sponsored%20Programs%209.15.03.doc>
4. Designating Funding as a Gift vs. Sponsored Program,
<http://research.louisville.edu/policies/designatingfunding.html>

**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 CAU Relations
Federal, State, and Local Governments	X	
Foreign Govts.	X	
Foreign/Private Foundations, Corporations (noncontract) 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 CAU 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).