Established
1891

Principal Investigator/ Program Director Handbook

Office of Sponsored Programs

The mission of the Office of Sponsored Programs is to serve as an advocate for a campus environment conducive to the research enterprise and advise the administration on matters of regulatory compliance, internal sponsorship of scholarly activities and other related issues. The office also seeks to assist faculty members in identifying funding sources, with development and review of proposals, and assuring compliance with sponsor regulations.

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PREFACE

PRE-AWARD

PREFACE

This handbook provides information and serves as a resource and guide to assist Delaware State University (DSU) faculty and staff in developing proposals and managing awards. The handbook has two sections: Pre-award and Post Award. Web links are provided to guide you to information on policies and procedures and various forms which will be essential as you develop your proposal for submission and successful management of your award.

The Office of Sponsored Programs (OSP) has designed internal controls to comply with the regulations of funding agencies and policies of the University. They are incorporated in this handbook and are a combination of agency regulations and institutional "best practices" that directly support the mission of the University.

The OSP serves as the submitting office for all proposals and applications for sponsored projects excluding Title III programs (handled through the Title III Office) and private corporate foundation/gifts (handled through the Office of Institution Advancement).

All budgets for approval along with a signed Internal Processing Form (IPF) and all supporting documents must be forwarded to OSP by Friday morning, 1 week before the agency deadline. All proposals (in final form) must be submitted to the OSP by 8:30 am on the submission day.

After an award is made to DSU, OSP is the starting point for faculty/staff to begin working on their projects. The Post Award section of this handbook provides a basic understanding of federal/state and university policies, processes and resources to support the successful administration of your sponsored award(s).

This Principal Investigator/Program Director Handbook will continue to evolve as updates are needed based on federal/state and university policies. Updates to all policies and procedures and specific forms are available on the OSP website. The Office of Sponsored Programs looks forward to assisting faculty and staff with their research endeavors.

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Thank you
Office of Sponsored Programs Staff

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INCENTIVES

Three university-provided incentives for securing grant funding are:

(1) <u>Release Time</u> to work on a project

(2) Portion of <u>Indirect Cost Set Aside</u>

When proposals are funded, regardless of the overhead rate, distribution will be as follows:

	Rate Distribution
Delaware State University	50%
Office of Sponsored Programs	10%
If the unit is a school	College – 5% Department – 5% Principal Investigator – 30%
If the unit is not a school	Unit – 5% Department – 5% Principal Investigator – 30%

None of the indirect cost money can be used to augment departmental salary lines with the exception of student workers or graduate student assistants. For additional information on the rate distribution and use, please contact the Office of Finance and Administration.

3) <u>Asset for Promotion and Tenure</u>

DEFINITION OF SPONSORED PROGRAMS

Sponsored programs are those projects and/or activities which are originated and conducted by members of the university faculty, and staff members that are supported wholly or in part by external restricted funds awarded to the University.

Sponsored Programs differ from gifts and donations in two ways: gifts are donative in nature, bestowed voluntarily and without expectation of any tangible compensation, product or outcome. While certain private grants may be considered gifts; these differ from sponsored programs in that the level of accountability imposed by the donor in the use of the gift is limited and usually does not require extensive technical or fiscal reporting.

NOTE: Research proposals and awards made by foundations/corporations that require extensive monitoring and reporting including but not limited to, effort reporting, human subjects, animal care, progress reports and evaluations must be approved for submission and the awards monitored through OSP. Contact the OSP should you have any questions before starting to develop a proposal to a foundation/corporation.

The Office of Sponsored Programs (OSP) is the centralized support structure for external federal/state funding through the University and seeks to assist faculty members in a variety of ways: assisting with proposal/budget review and processing (which includes proposal submissions) and post-award administration of a grant or contract. In addition, the OSP is an advocate for a campus environment that is conducive to the research enterprise, and advises the administration on matters of federal/state regulatory compliance, internal sponsorship of scholarly activities and other related issues.

The Office of Sponsored Programs will assist faculty and staff in identifying appropriate sources for potential external funding of sponsored projects and programs. Applications for sponsored projects usually include a line-item budget which states the monetary needs of the project. This budget may or may not include indirect costs which are calculated based on the University's Negotiated Indirect Cost Agreement. A copy of the Agreement can be found on the Institutional Fact Sheet. The absence of indirect cost in a line item-budget does not preclude the project from being designated as a sponsored program. The following is a partial list of the types of proposals handled by the OSP office.

- Research projects
- Research contracts
- Training
- Equipment Acquisition
- General curriculum development
- Graduate fellowships and traineeships
- Proposals that deliver programs, execute and manage specific projects (summer programs, demonstration projects, etc.)

In general, sponsored activities should be directly related to the mission of the institution: research, teaching and service. Other support such as competitive or formula fund awards are restrictive in nature, but are also included.

NOTE: External monies for sponsored activities are awarded to a Principal Investigator/Project Director (PI/PD) through the University.

> Solicitations of grants and contracts for sponsored activities must be processed through the Office of Sponsored Programs to ensure that the proper guidelines have been followed and the proper university approvals have been obtained prior to submission of the proposal to a sponsoring agency.

OFFICE OF SPONSORED PROGRAMS STAFF

The staff members in the Office of Sponsored Programs (OSP) are certified in Grants Management. They have the knowledge and expertise in federal/state and university regulations and policies to assist university faculty and staff with all phases of pre-proposal preparation and submission, including:

1. Identification of potential funding sources
2. Pre-submission procedures
3. Internal review, routing and approval
4. Timely submission to the agency

The OSP supports the University's resource acquisition practices in the following areas:

(a) assists with pre- and post-award activities related to the application and the administration of grants and contracts;

(b) identifies and assists administrators with developing institutional policies to conform with funding agency requirements;

(c) identifies new and innovative methods of obtaining support for institutional activities;

(d) assists in the reviewing of proposed budgets, compliance, support documents and certifications such as human subjects, animal use, research misconduct, Conflict of Interest (COI) and Responsible Conduct of Research (RCR), etc. The Office of Sponsored Programs staff cannot write proposals for faculty and staff.

(e) assists the PI/PD in reviewing applications not funded, returned, or disapproved, to determine what the weaknesses are and how

best to address the weaknesses in preparation of submitting a revised application;

(f)   monitors the activities on projects to insure (1) the project and the University are in compliance according to the OMB Uniform Guidance and agency terms and conditions, (2) issues are resolved appropriately and in a timely manner, and (3) funding agencies are being contacted when appropriate;

(g)   assures that all reporting requirements are adhered to by the institution and the PI/PD, including timely submission of technical reports, effort reporting, evaluations and inventory/patent reports as required in the agency's special terms and conditions.

THE PRINCIPAL INVESTIGATOR/PROGRAM DIRECTOR

The individual responsible for conceiving and implementing a project is known as the Principal Investigator (PI) or Program Director (PD). When this individual takes on the task of preparing a proposal for submission to an outside source, he or she agrees to manage the ensuing grant or contract in compliance with the terms and conditions and policies of both the sponsor and the University.

For each sponsored project a PI/PD must be named to delineate clear lines of responsibility for project management. In some instances, a colleague who is central to the project may be named co-principal investigator or be given another appropriate title.

Depending on the nature of the proposal, individuals with other university appointments may serve as principal investigators. Naming an individual in the proposal who is not an employee of the University does not commit the institution to employing that individual.

Unless otherwise indicated in the awarded proposal, PIs/PDs are expected to be in residence at the University during the period of project operation. A Principal investigator seeking a leave of absence for a period longer than specified by agency regulations (usually 3 months) must obtain written authorization from the sponsor through the Office of Sponsored Programs.

All sponsored projects that utilize campus facilities such as laboratories, classrooms; involve human subjects, animals, radioactive materials, toxic or hazardous substance; and involve any other faculty, staff or students as part of the project budget; or in any way affect the University, must comply with university regulations.

Pre-award

All sponsored program commitment requests must be submitted through the principal investigator's department Chair/Dean for review and approval. Likewise, individual awards using university facilities are subject to the same university review and approval.

CONFLICTS OF INTEREST

The University supports and encourages relationships which can advance academic research and sponsored projects. However, in order to protect the integrity of their research or project, potential, perceived, and actual conflicts of interest must be managed to avoid bias or the possible appearance of such in the PIs/PDs activities and responsibilities. "Conflict of Interest (COI) in sponsored programs" refers to situations in which financial or other personal considerations may compromise, or have the appearance of compromising a researcher/program director's professional judgment in conducting or reporting research and/or activities within a sponsored program. Conflicts of Interest may arise when employees use or appear to use their positions with the University for personal gain at the expense of the University. Members of the University faculty and staff must avoid such conflicts of interest. All faculty and staff members are encouraged and advised to review the University's Conflict of Interest Policy . NOTE: In some cases, agency guidelines may require Conflict of Interest forms be submitted at the time of submission or prior to releasing an award. Example – the U. S. Department of Agriculture has their own Conflict of Interests form that must be submitted with the proposal. However, this does not preclude the requirement for the University's Conflict of Interest to be on file for all individuals involved in sponsored projects.

FUNDING OPPORTUNITIES

The identification of potential funding sources for a research, training, or a technical assistance project is the first step in designing a funding strategy. It can be an exciting but resource-intense process. Grants.gov provides a unified website for interaction between grant applicants and federal agencies that provide grant/contract funding. IMPORTANT: Delaware State University is registered as an institution. Grants.gov federal funding opportunities can be found at http://www.grants.gov/web/grants/search-grants.html.

The Federal Register is another resource for federal funding opportunities, as well as the websites of federal agencies, many of whom have pages devoted to funding opportunities. Funding opportunities for the State of Delaware are normally announced through the various State agencies. Agencies such as: the Delaware Department of Education, Delaware

Department of Transportation and the Delaware Department of Health and Social Services, etc. have their own agency specific announcements. For State funding opportunities, visit the various State agency websites for more information.

Dear Colleague Letters (DCLs) are intended to provide general information to the community, clarify or amend an existing policy or document, or inform the NSF proposer community about upcoming opportunities or special competitions for supplements to existing awards. In addition, DCLs are often used to draw attention to an impending change in NSF policies or programs.

The University is registered with PIVOT, an electronic database used to assist with finding funding opportunities. PIVOT combines the most comprehensive, editorially maintained database of funding opportunities worth an estimated $44 billion with our unique database of 3 million pre-populated scholar profiles, drawing from Community of Scholars and Community of Science profiles. This database is accessible through the university employee's Blackboard account (Grants and Gifts Council/Funding Opportunities).

INSTITUTIONAL DATA

The university's Office of Institutional Research Planning and Analytics (IRPA) can assist faculty and staff engaged in research studies with university data requests from foundations and governmental agencies (federal, state and local). Note: if the data required is more detailed than the University's standard statistical data, the office will need a sufficient amount of time to research and organize such information. A Data Request Form for University faculty and staff is available on the IRPA website.

SPECIAL TYPES OF FUNDING

Intergovernmental Personnel Assignment Agreements (IPAs): Under the revised Intergovernmental Personnel Act (IPA) mobility program regulations (5CFR part 334) effective May 29, 1997; university faculty and staff may arrange to work with government agencies on a temporary basis, or federal government employees may come to work at the University under an IPA arrangement. Such individuals serving in a faculty capacity are subject to the same appointment processes as other individuals being considered for faculty status. In all cases, Department Chairs and University Deans must be consulted to determine the impact of proposed IPA arrangements to the department and college. Since such assignments may incur fiscal commitments and liability on the part of the University, IPAs must be signed by the Provost.

Government Fellowships - Some graduate fellowship programs sponsored by government agencies (such as the Fulbright-Hays and Patricia Roberts Harris Fellowship through the U.S. Department of Education) require submission through the University. Students can be principal investigators based on the type of award, and if required by the funding agency. Contact the OSP with questions on federal/state special funding announcements.

TYPES OF PROPOSALS

A proposal is a request for external or internal support of a research, training, or technical assistance project. A proposal to a funding agency for a sponsored project may either be solicited, renewal/continuation, unsolicited, limited-submission or consortium/joint proposal.

A. Solicited Proposals are usually government generated "Requests for (RFP), or Request for Application (RFA) on a specific research, training, or technical assistance project. In such cases, the intended scope of work is pre-determined by the soliciting agency, and specific requirements for the format and content of both technical and cost proposals are presented in the published requests. The successful solicited proposal may result in either a contract, grant or a cooperative agreement. Government RFPs and RFAs are widely advertised in sources such as the Federal Register and Grants.gov.

B. Renewal/Continuation Proposals are competing renewal proposals (also called a competing continuation proposal). This type of proposal is a request for continued funding of a project/program for which funding is about to end. These proposals are similar to a "new" proposal and must be routed and approved in the same manner.

A Noncompeting Continuation Proposal is a proposal that is to request next year's funding within a multi-year award. If not specified in a sponsor's application form or instructions, a non-competing continuation proposal should include:

- Cover page, including signatures

- Progress report (when required) or summary of results and discussion of future plans.

- A revision of the original budget proposal when necessary. It is especially important before submitting a renewal budget to confirm that cost elements, the indirect cost and fringe benefit rates are up-to-date. Significant budget increases not caused by changes in these rates should be

discussed with the sponsor before the renewal proposal is submitted or should be explained in the proposal.

- Additional relevant materials such as <u>curricula vitae and biographical sketches</u> for new professional personnel or reprints of research results.

C. <u>Unsolicited Proposals</u> are initiated by individuals with a new or innovative idea that is submitted on the initiative of the offeror for the purpose of obtaining a grant or contract. These proposals are not in response to a RFP/RFA or any other government-initiated solicitation or program. Many funding entities have general requirements for the format of unsolicited proposals. When unsolicited proposals are involved, it is wise to contact a program officer within a funding agency to discuss a project idea before actually submitting a formal proposal.

D. <u>Limited-Submission Proposals</u> – Sponsors may announce program funding and limit the number of proposals that may be submitted by an institution. Should more than one faculty be interested in submitting a proposal to such an announcement, OSP will notify the appropriate deans/department heads to select the proposal to be submitted.

E. <u>Consortium/Joint Proposals</u> will involve PIs/PDs at more than one institution. Generally, one institution will be designated as the lead institution at the time the proposal is submitted. The lead institution accepts the full funding and full responsibility for project performance. The lead institution issues a sub-award agreement to transfer part of the work and appropriate funds to the other participating institutions. In other cases, such as a collaborative proposal to the National Science Foundation, each institution submits their own part of the proposal, the agency links the proposals electronically at the time of submission, and separate awards are made to each institution.

PRE-SUBMISSION PROCEDURES

Preparing a proposal can be a major undertaking; so it is highly recommended to plan ahead and become familiar with DSU's <u>proposal process</u>. When first considering external funding for research or training projects, PIs/PDs should discuss their research/program interest with their Department Chairs and/or appropriate supervisors prior to contacting the Office of Sponsored Programs. A "<u>Faculty Proposal Submission Response Form</u>" (available on the OSP website) is required from all faculty and/or staff looking to submit proposals. To help the OSP plan their workload and offer to the PI, assistance, this form should be submitted to the OSP at least 10 business days prior to submission of the proposal.

Pre-award

Most program officers at funding agencies welcome advanced contact by researchers for information about funding opportunities and advice on proposal preparation. Agency contacts can be made informally through an email, telephone inquiry or agency visit, while more formal contacts include: a letter of inquiry; a letter of intent; a preliminary proposal.

Individuals are encouraged to make telephone inquiries or visit a potential sponsor on their own but may request assistance from the OSP staff. Throughout the course of such calls or visits, there cannot be any commitments of university resources or cash/in-kind matching.
    However, in no case, should a private foundation or corporation be contacted for donations without prior approval from the Division of Institutional Advancement Office.

Formal contact mechanisms

(1) A Letter of Inquiry is a general written presentation of a project idea designed to elicit feedback from a potential sponsor. As with telephone inquiries or agency visits, commitments for university resources cannot be made. A formal routing or review of a Letter of Inquiry may be required by Department Chairs or University Deans. Individuals are encouraged to forward a copy of such correspondence to notify the OSP of any pending proposal development resulting from such inquiries.

(2) A Letter of Intent expresses the intention to submit a proposal in response to a particular program announcement or a Request for Proposal (RFP)/Request for Application (RFA). Letters of Intent are generally solicited by the sponsor in conjunction with announcements expected to generate widespread interest. Agencies generally require that such letters present only a general statement of the intended research theme. A copy of the Letter of Intent should be filed with the OSP. If the Letter of Intent contains budget estimates or ranges, it must be reviewed and processed through the OSP with an internal processing form and proper approvals from (Chairperson, appropriate Dean, the Associate VP for Research and the President (or his/her designee) prior to submission.

(3) Preliminary Proposals, like Letters of Intent, Preliminary Proposals are generally solicited by sponsor agencies. A Preliminary Proposal (pre-proposal) usually includes a one to five-page description of the project. It may also require an outline budget and some indication of the University's willingness to support the project through a commitment of resources. Any documents that mention monetary or non-monetary commitments must be processed through the principle investigator's department (Chair/Dean) with an internal processing

form with proper approvals (Chairpersons, appropriate Deans, the Provost and the President (or his/her designee). The appropriate staff in the Office of Sponsored Programs must review and process the proposal prior to submission. If a preproposal does not include a budget or institutional commitment, a signed internal processing form is not required and the preproposal is not required to be filed with OSP.

It is very important that the PI complete and submit the Faculty Proposal Submission Response Form as soon as they have received permission from their department heads to apply for funding. At that time, the OSP will receive a copy of the agency announcement. OSP will need the agency announcement at least <u>two weeks prior</u> to the submission date, in order to allow the staff adequate time for review of the submission requirements and agency compliance guidelines.

Questions to Consider in Developing a Proposal

Most applications for funding go through a process of peer review to select the most meritorious applications. In reading a proposal reviewers seek to understand the project you are proposing, why it is important and what is the probability that the project will be successful. In order to develop a proposal that will answer the reviewer's questions about your project, you need to develop answers to the questions below.

1. What is the idea or problem you want to examine/address?

2. Why is it important? To Whom? What related research/project has been done before and why is yours different/needed?

3. Why are you the ideal person to address this research or to do this project? Why now?

4. What do you expect to achieve in relation to the need (goal)?

5. What will you do to address the problem?

6. Can the efforts to address the problem be grouped together as common activities that are measurable objectives?

7. How long will it take (a time-line)?

8. What resources are needed to do this project (time, money, collaborators, travel, materials, equipment, space, etc.)?

9. Are there any obstacles in the way of implementing your project?

10. What are the qualifications of the PI/PD and senior personnel?

11. Which office provides assistance on statistics about the University?

12. How will you disseminate result findings?

13. Can this project/research be replicated or furthered?

14. Will the project/research continue once the grant funding ends?

A strong proposal will address the answers to these questions in a way that is easy for reviewers to understand and relate to.

GENERAL FORMAT FOR PROPOSALS

Most sponsoring agencies have a specific format and guidelines for preparing proposals, including the required forms, character size and typeface, header/footer formatting, margins, biographical data, page limitations, numbering format and budget. In the absence of such guidelines, the following format may be useful.

Cover or Title Page:

The Cover or Title page should include the following:

- the title of the proposed research/program;

- the name and address of the sponsor to whom the proposal is being submitted;

- name and title of the PI/PD;

- the name and address of Delaware State University; (identify OSP as the office to which all correspondence should be sent: Delaware State University, Office of Sponsored Programs, 1200 N. DuPont Highway, Dover, DE 19901);

- the University department where the work will be conducted;

- the proposed period of performance;

- cumulative total of requested support;

- signatures of authorizing officials: The signature of the PI/PD, his/her Chair, Dean, OSP and the President of the University (or designee) are required to process each proposal.

NOTE: University information can be found on the "[Institutional Fact Sheet](#)" on   the forms library page of OSP's website.

Summary or Abstract

While an abstract is not required by all sponsors, it is a highly effective means of presenting a project to a reviewer or review board. The abstract opens the door to the proposal; as it is normally the first section read by a reviewer and is vital in creating a favorable first impression. The abstract should highlight the scope of the proposed research, including its objectives and the intended methodology, the   anticipated results, a statement of potential significance, and the time span of the project.   Abstracts should be approximately 200-350 words and not exceed one typed page.

The abstract should stand alone as a complete description of the proposed project. Do not refer to figures, tables, or literature appearing in any other part of the proposal. The abstract is usually the last section to be written.

Table of Contents

A table of contents should be included immediately following the abstract page. A list of illustrations or tables should also be prepared, <u>if appropriate.</u> Since the abstract precedes the table of contents, the abstract is not listed in the table of contents.

The table of contents should list major sections of the proposal and give the specific page location where each section begins in the narrative. It need not include all subheadings but should be detailed enough to allow reviewers to find the section or sections they are interested in, without having to search through the entire proposal.

Specific Aims/Statement of Need

While usually brief, the specific aims or statement of need is one of the most important parts of the grant application. Like the abstract, this section should engage the reviewer's attention, clearly stating the problem or need to be addressed, the significance of the problem and the potential impact of the proposed project. Your goal for this section is to encourage a full reading of the proposal. Statistically, proposals that are read through at one sitting have a higher rate of success.   Here are some general guidelines for the preparation of the proposal introduction.

- Tailor the introduction to the specific guidelines or funding criteria of the sponsor;
- State the problem or gap in knowledge, and emphasize why you and/or the University should receive funding to address the problem.

Pre-award

- Mention your previous accomplishments in the area of research or the program being proposed.
- Describe your ability to carry out the proposed project.
- Construct the final paragraph of the introduction that explains the potential impact of the work and that leads into the next section of the proposal.

NOTE: Follow sponsor guidelines on length; in the absence of detailed guidelines, the Specific Aims/Statement of Need should not exceed two (2) pages.

Description of Proposed Research/Program

The description is where the details of the project activities are presented. The most important element in the proposal is the definition of the objectives and scope of the project. Explain project goals, methodology and expected results carefully. To the extent possible, describe in detail a project plan appropriate for the length of the grant.

The PI/PD should go into as much technical detail as is necessary to help reviewers understand what they intend to do and how they will carry out the project. Reviewers give good ratings to proposals where they can visualize how the project will be carried out. The project description should provide enough detail so that the reviewer can imagine themselves implementing the project. An objective should match every need/goal stated in the introduction, and a procedure should describe how every objective will be accomplished. NOTE: It is suggested that you carefully consider the level of the funding requested and define the objectives and scope accordingly. There can be a risk of defining the scope and objectives too broadly; therefore, use words that leave little room for interpretation. Failure in writing clear objectives and scope of work could lead to a poorly reviewed proposal.

Objectives - Objectives should flow logically from the problem statement/needs assessment. Objectives relate directly to the goals and explain what you are going to do, but not how you are going to accomplish your goals. The Methods or Procedures section describes the how. The objectives must be articulated clearly and should state the intended outcomes of the project. These should be presented as specific and measurable expectations.

Procedures/Activities – The procedures section provide details of how the PI/PD will carry out the project. Procedures may be organized by activities tied to specific procedures; by functional categories such as planning; development; and implementation; or by major time blocks.

If the PI/PD intends to have faculty and staff on the project, they must briefly describe the skills/expertise of the person(s) to be chosen and explain their responsibilities to the project. One should also include an explanation of how the project will be administered and define the responsibilities of any advisory groups or organizations with which they plan to work. Most federal and state agencies require Letters of Agreement or Letters of Support be included from such cooperating organizations or consultants.

Strong proposals frequently include a time-line as part of the procedures section or may be written up separately. Timelines can serve as a kind of operational summary of the planned implementation helping reviewers understand how your project would unfold. Be sure to leave time at the end of the project for preparation of publications describing your outcomes and the final agency reports. The writer of the proposal should be realistic about how much they can accomplish in the period of time set aside for each part of the project. The persons reviewing the proposal will easily recognize an overly optimistic timetable.

In this section, please bear in mind that agencies limit the number of narrative pages (review the proposal announcement guidelines). Always use all of the space available to describe your project, and ensure that all information necessary for review is included in the body of the proposal. Supplementary materials should be placed in an appendix only if required by the agency.

Project descriptions typically include bibliographies, tables, charts, and illustrations. Figures and charts can engage reviewers and break up the monotony of text, and even for grants that support educational programs, reviewers expect the proposal to demonstrate that the project is well-grounded in the relevant literature.

Reprints, and other supplementary materials may be included if the agency allows it and they enhance the effectiveness of the presentation. Reviewers dislike reading applications that are extended with unnecessary material, and may downgrade a proposal that is perceived to be padded. Since many sponsors limit the number of pages of text, it is important to verify if supplemental materials, such as appendices, are allowed and if they are included in the page limit.

Evaluations

If the project is one which will require an evaluation of its accomplishments, a description of the evaluation design usually follows the procedures section. The evaluation, which is usually carried out both during the project and after its conclusion, can be done in a number of ways. Its basic intent is to determine whether or not the project was successful in carrying out its objectives. A concise description of the evaluation design is essential, particularly in educational and intervention proposals.

Some proposals may require a Logic Model (also known as a logical framework or program matrix). This particular evaluation tool is used by funders, managers, and evaluators of programs to evaluate the effectiveness of a program. The logic model can be used during planning, implementation and reporting. A Logic Model is usually a graphical picture of the logical relationships between the resources, activities, outputs and outcomes of a program. Many examples of logic models can be found on the internet to guide you if it will strengthen your proposal.

Personnel

Explain the tasks to be completed by all project personnel and summarize their qualifications. Include bio sketches for all project personnel who are identified including postdoctoral associates and/or graduate students or research fellows. Most agencies have a specific format for bio sketches so be sure to read the application instructions carefully. Questions regarding the status of any professional person or how an employee is to be paid for work outside of their normal work hours and job description should be directed to the Office of Human Resources.

Current and Pending Support

Most federal sponsors are interested in the PIs/PDs and key personnel's current and pending support for related projects, as well as evidence of their current commitments. "Pending Support" refers to all outstanding proposals. Proposals that have formally been rejected or withdrawn are not included as pending support. It is suggested for PIs/PDs to indicate in the Current and Pending Support section what their plans will be under the various possible funding scenarios, paying particular attention to committed level of effort. Your total effort cannot be over 100% (this includes, teaching, administrative work, mentoring, etc.). Total effort is in association with your institutional base salary

Biographical Sketches

(Bio sketches) are required for most federal grant applications. They provide an opportunity for the PIs/PDs and other key personnel participating in a grant proposal to provide reviewers with a picture of their education, experience, publication record, and their contributions to their research/program field. Review the agency announcement and guidelines on what to include in the bio sketch. However, if the announcement does not provide guidance as to what to include, the following is a listing of items normally included in a biographical sketch:

Pre-award

- ➢ Professional Preparation – Education
- ➢ Appointments
- ➢ Publications
- ➢ Synergistic Activities
- ➢ Collaborators & Other Affiliations
- ➢ Graduate Advisors and Postdoctoral Sponsors
- ➢ Thesis Advisor and Postgraduate-Scholar Sponsor

Most biographical sketches are limited to two pages. Your bio sketch should not include personal details or contact information.

Management Plan

A management plan provides researchers the opportunity to explain the objectives, goals and planned procedures of their proposed projects in detail. Not all grant proposals require the submission of a management plan; however, even if your proposal does not require a management plan, you may still find it beneficial to consider the points below as they can be helpful to any well-developed and organized proposal.

- ➢ An outline of the project's objectives and goals.
- ➢ A list of actions to achieve the goals and objectives.
- ➢ Descriptions of the roles and time commitments of personnel and participants involved in the project, as well as how these roles might change throughout the project.
- ➢ Procedures to recruit and train participants, if applicable.
- ➢ Procedures to acquire and maintain equipment, if applicable.
- ➢ A timeline for various stages of the project.
- ➢ A process to handle possible project modifications.
- ➢ Consideration of the project's broader impacts.

PERT and Gantt Charts are project management tools that can be used to schedule, organize, and coordinate tasks within a project.

Budget

The PIs/PDs best estimate of the financial support required to carry out the statement of need should be presented in detail in the proposed budget. Budgets should represent the estimated annual costs associated with the proposal, unless otherwise directed in the agency guidelines. The OSP may be consulted for guidance in developing these estimates. Faculty are encouraged to group costs according to sponsor requirements. While a proposed budget should provide adequate funds for producing high quality research, it should not include excess funds.

Budget Justification

A budget justification is a way of explaining and justifying the requested funds in a narrative format. Details that can help clarify the budget line items in the actual budget form should be included in this section. Most sponsoring agencies will have established a generally acceptable list of budget items. If the agency has a budget format with specific line items, it must be followed as specified. The budget justification or narrative should be separated from the itemized budget, but follow immediately afterwards. Regardless if one is required by the agency, OSP always requires a budget justification for review to determine if requested funds are allowable according to agency guidelines and for approval of expenditures should the proposal be awarded.

Most federal agencies have approved standard agency budget forms; however, if there are no agency forms provided on-line or within the application; a sample budget and budget justification can be found on the OSP website. NOTE: Budgets from various agencies may differ; however, essential line items are about the same for all agencies. Generally allowed budget costs can be found in the Office of Management and Budget's (OMB) Uniform Guidance (2CFR 200 Subpart E- Cost Principles).

Budgets normally include two categories of costs: Direct and Indirect Costs. It is important to note that not all proposals allow for indirect costs also known as Facilities and Administrative Costs. If applicable, Cost Share/Matching may also be a part of the budget.

Direct Costs

Direct costs are those costs which can be identified specifically with a particular sponsored project and which can be directly assigned to such activities, relatively easily and with a high degree of accuracy. For example, the supplies needed for a research project are easy to identify; as are the salaries of the individuals who will work on the project and their travel expenses. Some of the typical line items in a direct cost budget are as follows:

Salaries & Wages: All personnel who will devote time to the project are listed in the budget. Personnel are usually listed in this order: PI/PD, key personnel, staff personnel, casual part-time workers, graduate and undergraduate students. The grant writer should include project staff titles, the percentage of time to be spent on the project, and the requested amount to support each person for the budget period. Proposed salaries are estimates based on the staff's university base salary and are paid in accordance with established university guidelines. The institutional base salary (IBS) is the annual compensation for an individual's appointment (9 or 12 months). This includes individual's time spent on research, teaching, administration or other

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activities. IBS does not include bonuses, one-time payments, stipends, or incentive pay. Additionally, IBS does not include payments from other organizations or income that individuals are permitted to earn outside of their University responsibilities, such as consulting. IBS must be used as the base salary on all grant proposals, and is the basis for effort reporting.

Faculty salaries are based on their university faculty contract agreement. Policies for summer pay differ from agency-to-agency.

Salary estimates beyond the current fiscal year should include annual increases of no more than three (3) percent, which are not guaranteed unless approved by the appropriate university administrators. Procedures for new staff classification and recruitment can be obtained from the Office of Human Resources.

Some proposals involve course releases, a reduced workload, or a workload reallocation for a faculty member to work on an externally funded grant or contract. Approval for course load adjustments and affected salaries must be approved by the appropriate Chair, Dean and Provost.

If awarded, project staff receiving salaries will be required to do Time and Effort Reporting. For full time professional staff, effort reporting must be stated in percentages; however, some proposals may require time committed to the project be stated in months. To assist with the conversion between percentages and months, a Helpful tool is available: NIH has a link Usage of Person Months on its website which contains a worksheet that can assist you with the conversion of calendar months to percent effort.

Student Employee: A student who is working on a job while attending school is a student employee. A student employee is a part-time temporary employee who, in the case of a sponsored project, is hired to work in a variety of capacities that can help provide fast and efficient service to the project. The student employee's primary purpose must actually be working on the project as an employee and not as a participant in training on the project. The student employee is listed in the personnel line of the budget along with other project staff. As PIs/PDs, you are providing a student an opportunity to develop work habits, skills, and contacts that can serve the student and the project.

Fringe Benefits: Fringe benefits consist of the University employee contributions to Social Security (FICA) retirement programs, insurance, worker's compensation, unemployment compensation, and other items set by the State of Delaware. Fringe benefits are calculated as a percentage of salary. Actual fringe benefits and break outs can be found on OSP's website - "Institutional Fact Sheet". NOTE: Fringe benefits usually change July 1

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annually as determined by the State Budget Office. As you are developing your budget, always check the OSP website to verify the correct fringe benefit rate.

Capital/Permanent Equipment: This is defined by the federal government as non-expendable tangible property costing $5,000 or more per unit and having a useful life of two or more years. The cost of shipping, installation, and fabrication should be included in the cost of equipment. Whenever possible the project director should specify the name, model number and the manufacturer of the equipment in the justification. Refer to agency guidelines; as a quote from the vendor should normally be included in the proposal.

Contractual Services: Contractual services may include work performed by an independent contractor requiring specialized knowledge, experience, expertise or similar capabilities. Contractual services may also include but are not limited to:

- use of university core facilities such as the machine shop, imaging core or copy shop
- maintenance, repair and alterations of buildings or equipment;
- reproduction services;
- shipping/handling and storage;
- publicity and advertising;
- employee training;
- food services/catering;
- space (leases or rental of off-campus space)
- evaluation analysis or advice in formulating or implementing; improvements in programs;
- services in which consulting procedures would be applicable.

If contractual services are needed on your project, make sure there is a contractual line in the budget and budget justification. If the agency budget forms do not have a contractual line, you may need to contact the agency program manager to verify if it is allowable. IMPORTANT: There can be no contractual agreements made prior to receiving an official award notification.

Materials and Supplies: Supplies are identified and justified as all tangible expendable items or personal property other than those described above in Capital/Permanent Equipment. A computing device is a supply if the acquisition cost is less than $5,000, regardless of the length of its useful life. This budget category should be supported by descriptions of the items included and best estimates of their cost.

Travel: Sponsors will generally pay domestic or international airfare, rail

and/or bus if such travel is necessary for the project and is so justified and approved. Delaware State University uses the government's GSA website to estimate per diem rates for meals and mileage. Also, included should be lodging, local transportation costs, such taxies/airport shuttles, tolls and parking. Refer to the University's Travel Policy prior to developing your travel budget. NOTE: Some announcements have mandatory attendance at annual agency and/or project meetings. Carefully review the announcement for travel requirements.

Other Direct Cost may include (see agency proposal guidelines):

- Printing and publishing;
- Photocopying;
- Publication costs, such as per page charges and reprints;
- Meeting/workshop expenses;
- Membership fees;

Participant Support Cost: Is a direct cost for items such as: stipends, subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with a training or conference. Costs not directly paid on behalf of the participant/trainee can not be charged to any participant costs budget line. Examples of costs not considered participant costs are:

- Honoraria for quest speakers
- Expenses for the PI/PD
- Project staff or collaborators to attend project meetings
- Conferences or seminars
- Payments to graduate research assistants
- Payments to research subjects as an incentive for participation in a research project.

Those costs must be charged to the direct cost budget line associated with that expense. The pay range for graduate students must conform to university limits (in some cases living expenses are allowable). Note: All participant support costs should be under this category in the proposed budget, unless otherwise specified in the guidelines. Funds budgeted in this category cannot be transferred to any other budget line outside of participant cost without agency prior approval. Funds can be transferred intoparticipant costs; however, those funds must be put in the participant cost "Other" budget line for tracking purposes. Participant support costs are excluded from the indirect costs (IDC) calculation. Please reference the Indirect Costs section in this handbook for further guidance on how to calculate IDC.

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Student Participants: Student participants are students participating on a project as trainees (but not employees) can receive a stipend for their participation in the project if it is a part of the award budget. Stipends for student participants are listed under the participant cost line of the budget. The request to pay student participants is processed through the university requisition process through the Accounts Payable Office. Contact your financial administrator as to the pertinent information required on the requisition for student participants to receive their stipend. Note: For more information on International students with a F1 and J1 Student VISA status, please contact the Office International Affairs.

Sub-agreements: A sub-agreement may be either a sub-contract or a sub-grant, each of which is an agreement between the University and a third party to transfer a portion of the University's obligations on a sponsored project to that party. If DSU is the lead institution and submits a proposal that includes sub-agreements, the PI/PD should include a scope of work, a budget and budget justification of the funds to be paid to the subcontractor or sub-grantee.

Estimates obtained should be attached to the budget proposal. Federal agencies often require a separate Cost and Pricing Proposal and appropriate Sub-contractor Certifications depending on the type of service and in accordance with the Truth-in Negotiations Act (P.L. 87-653).

PIs/PDs should identify each sub-agreement separately. Sponsor approval of the proposal normally constitutes approval of the sub-agreements that are included in it. A Sub-agreement is not executed until the grant or contract has been awarded. Note: when including sub-agreements in the proposal budget, the University has a negotiated modified total direct cost (MTDC) rate which includes the first $25,000 of each sub-agreement total in the calculation. All other sub-agreement costs over $25,000 (regardless of the time period) is excluded from the calculation. If the agency guidelines specify calculating sub-agreement budgets differently, please contact OSP. Please reference the Indirect Cost section of this handbook for further guidance.

If DSU is the proposed sub-awardee, the sub-award proposal must go through the same proposal submission process and approvals as the submission of any grant proposal before being submitted to the lead institution and/or organization.

Total Direct Cost: The total direct cost is the sum of the above elements.

Cost Share/Matching: (Uniform Guidance 2 CFR 200.306) "Under federal research proposals, voluntary committed cost share is not expected. It

cannot be used as a factor during the merit review of applications or proposals, but may be considered if it is both in accordance with the Federal awarding agency regulations and specified in a notice of funding opportunity".

Cost sharing is a phrase used to indicate that more than one sponsor will share in the costs associated with a project. The most common relationship is for an external sponsor to provide the majority of the funds and for the University to provide the remainder of the project funds. Cost sharing and matching are nearly synonymous and are often used interchangeably. The different types of cost share/matching are as follows:

➢ *Voluntary Committed Cost Sharing* – is cost sharing not mandated by the sponsor; however, the cost sharing amounts were included in the proposal and/or budget, approved by the sponsor; with the intention of the grantee providing funding for those costs should the proposal be funded.
➢ *Voluntary Uncommitted Cost Sharing* – is cost sharing that occurs during the life of the award and was not offered in the proposal and/or budget provided to the sponsor.
➢ *Mandatory/Involuntary Commitment* – is where agencies require cost sharing in their published program announcement and/or request for proposals (included in the proposal and/or budget).

It is suggested that PIs/PDs only include cost share/matching when specifically required by the sponsor (some agencies strictly prohibit cost sharing/matching).

Cost Share/Matching may be in the form of actual cash expenditure of funds or may be an "in-kind", which is the value of non-cash contributions to the project. In-kind Cost Share/Matching contributions made by a party other than Delaware State University requires documentation from the third party that supports use of the funds as in-kind-matching and may require a certification of fair market value from the party providing the cost share/match. Unless waived by the terms of the program, federal cost principles require that cost share/matching contributions meet all of the following criteria:

➢ Are verifiable from the recipient's records;
➢ Are not included as contributions for any other federal award;
➢ Are necessary and reasonable for the accomplishment of project or program objectives and are allowable under Subpart E–Cost Principles of the Uniform Administrative Requirements;
➢ Were not purchased with federal funds

> ➢ Are provided for in the approved budget when required by the federal awarding agency.

Faculty who are submitting proposals with an institutional match must obtain a commitment letter committing to that match from the appropriate institutional officials (chair →dean →AVP Research (where applicable) → provost) before submitting the grant package to the Office of Sponsored Programs. Requests for institutional matching commitments must be submitted four weeks prior to the sponsoring agency deadline, and *must include a draft of the project budget.* The Letter of Commitment must include what is being committed, the dollar amount and the duration of the commitment.

Since cost-sharing is reviewed by the sponsored organizations, best practices show that a separate budget and budget justification for the cost share is more favorable during the review process. Contact the OSP with questions regarding Cost Sharing/Matching.

Indirect Costs: Indirect costs are (also known as Facilities and Administrative Costs) expenses incurred by the University for its facilities and services. Indirect costs are costs that are not directly accountable to a cost object (such as a particular project/program, function or product). Indirect costs are not for profit, but are real costs to the University to support sponsored activities. The University's indirect cost agreement and calculation can be found on OSP's website on the "[Institutional Fact Sheet](#)". Indirect cost should not be discounted to heighten the acceptance of a proposal. The University's indirect cost rate is federally negotiated and reductions are normally only allowed when dictated by law or agency policy. Example – most U.S. Department of Education's programs cap indirect cost at 8% regardless of the University's Negotiated Indirect Cost Rate. Reductions (including waivers) in indirect cost that do not meet the University negotiated rate or agency policy must be approved in advance prior to the OSP deadline. All request must be made to the OSP. Please include the following in your request: (1) request being made; (2) a copy of the proposal abstract; (3) budget and; (4) budget detail.

The following will help you in calculating the indirect cost as approved in the institution's negotiated indirect cost agreement.

The on-campus negotiated rate is 46% (calculated .46) of total direct cost consisting of all salaries and wages, fringe benefits, materials, supplies, services, travel, and subgrants and subcontracts up to the first $25,000 of each subgrant (sub-awards) - regardless of the period covered by the subgrant or subcontract. Total direct cost shall exclude equipment, capital expenditures, charges for patient care, student tuition remission, rental cost of off-site facilities, scholarships and fellowships as well as the portion of each subgrant and subcontract in excess of $25,000. *This rate should be used on all grants*

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unless the funding agency has stated otherwise in its guidelines, which has to be submitted to the Office of Sponsored Programs. If a lesser rate is required by the agency, then the calculation is that percent times the total requested amount.

Total Direct Cost to Include	Total Direct Cost to Exclude
Salaries & Wages	Equipment
Fringe Benefits	Capital Expenditures
Travel	Charges for Patient Care
Supplies & Materials	Rental Cost of Off-Site Facilities
Services (Contractual Services)	Participant Costs – *(Student Tuition Remission, Scholarships and Fellowships)*
Sub-grants & Subcontracts (Up to $25,000)	Excess of $25,000 from Sub-grants, and Subcontracts

Please reference the Institutional Fact Sheet for further guidance on IDC.

Total Project Cost/Total Budget: Sum of direct and indirect costs.

IMPORTANT REMINDER: The final budget and justification has to be sent to the OSP (Grant Accounting Administrator) by Friday morning, 1 week before the agency deadline. All proposals (in final form) must be submitted to the OSP by 8:30 am on the submission day.

Assurances

Agencies frequently require certification assuring institutional compliance with regulations governing federal or state funded research. Certification is assured via institutional signature, compliance checklist or forms included in the application packet. If there are any documents for which the agency requires a "live" signature of the signing official, those documents should be submitted with the proposal package or submission of the proposal will be delayed. Some general assurances are but not limited to:

- Civil Rights
- Age Discrimination
- Sex Discrimination
- Americans with Disabilities
- Drug-Free Workplace
- Lobbying

SUBMITTING A PROPOSAL

Principal Investigator/Project Director

Before preparing to submit a proposal, the PI/PD will need to ensure they have completed and submitted the Faculty Proposal Submission Response Form as soon as they have received permission from their department heads to apply for funding. At that time, the PI/PD will forward a copy of the agency announcement. OSP will need the agency announcement at least two weeks prior to the submission date to prepare for proposal review.

In preparing to submit you proposal for approval, the following 5 elements need to be sent to OSP for review through the Proposal Submission System:
1. Internal Processing Form (IPF) with all required departmental signatures
2. Budgets, budget justifications, and any letters documenting the DSU institutional commitment or support
3. A 1 page proposal summary or abstract
4. Agency required documents needing signature
5. If there is a subcontract, all subrecipient documents requiring signature

If there are any documents for which the agency requires a "live" signature of the signing official, those documents should be submitted with the proposal package or submission of the proposal will be delayed.

Please ensure you are using the most recent IPF from OSP's website to avoid any delays in processing your application. The Department Chair and Dean must approve the proposal by signing the IPF before the budget is reviewed by OSP. The final proposal package must be submitted to the OSP by 8:30 am on the submission day. NOTE: It is extremely important that you are submitting your final proposal as any changes to the document after submitting to OSP for review could slow down the process and stop the proposal from being submitted.

When submitting the IPF and the budget, the PI/PD confirms that the information on the IPF and proposed application are accurate and factual, and when the project is funded, the PI/PD will assume accountability for carrying out the terms and conditions of the award. Submission of the IPF and proposal also certifies that neither the PI/PD nor anyone involved in the project is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from transactions by any federal department or agency. The PI/PD will indicate whether the project involves an actual or potential

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conflict of interest or commitment, based on the University's Conflict of Interest policy.

The PI/PD is responsible for identifying the total costs of the project, sources of funding and approvals for cost sharing, and making any arrangements required for space and facilities. The PI/PD, by his/her submission of the IPF form and application is stating that they will meet the proposed level-of-effort if the project is funded. The PI/PD cannot begin research activity on a project until completing the applicable administrative reviews and approvals. It is the PIs/PDs responsibility to ensure that the IPF is checked off accordingly if biohazards, recombinant DNA, animal subjects, human subjects, will be used in the proposed research.

Once the proposal and all supporting documents are complete and ready for final review, the proposal packet can be submitted to OSP for processing and submission.

Department Heads (Deans/Chairs/Supervisors

When a department approves an Internal Processing Form (IPF), they are certifying that the PI/PD, to the best of the department head's knowledge, is competent and capable of carrying out the proposed project. Please ensure you are using the most recent IPF from OSP's website to avoid any delays in processing your application. The department head's signature also signifies that when the project is funded, the PIs/PD's responsibilities within the department will be adjusted so that the PI/PD can commit the required level of effort to the project and that the required resources, space and facilities will be available should the proposal be awarded. The department head will determine whether the proposed project is consistent with the mission of the Department, the College, and the University.

Office of Sponsored Programs (OSP)

The OSP processes many proposals each week and because changes may sometimes be made to those proposals; constant communication is necessary between the OSP staff and the PI/PD. The submission deadline date and any other special instructions must be clearly indicated on the IPF. <u>Should changes be required on a proposal submitted close to the deadline date, timely submission may be endangered.</u> (In some cases, the home or cell telephone number of the PI/PD will be needed by OSP).

When submitting proposals to the OSP, the PI/PD should provide OSP with the: original final proposal. The Board of Trustees Bylaws (adopted January 11, 2007 with most recent amendment 9/15/11) empowers the President of the University to have final authority to approve proposals. Article

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VI. Delegated Authority, Section 1. Authority Delegated to the President, Item H- which specifies "Authority to represent, or to delegate representation of, the University's interests in other business entities authorized by the Board to be formed for the benefit of the University."- constitutes formal authority for the President to be so empowered.

The president or his/her designees are the ONLY authorized individuals who may commit to a grant or contract on behalf of the university.

A proposal may be submitted to one or more sponsors, at the discretion of the PI/PD. Many federal agencies do ask to be notified if a proposal has been submitted to more than one agency; this does not affect the proposal's chances for acceptance. Each proposal must; however, go through the University's internal process of review before it is submitted to a sponsor.

The Proposal Process and Proposal Submission System can be found on the OSP website. Carefully following the proposal process can not only provide a successful submission but save the PI/PD much undue stress. The proposal checklist on the next page can be used as a guide.

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Proposal Checklist

The checklist below is to assist with completeness in the preparation and review of proposals. If the agency provides a checklist with the application, the agency checklist should be used since it is agency and program specific.

☐ Are the correct proposal application forms being used?

☐ Has the application been developed according to application guidelines, e.g., page limitations, margins, attachments, etc.?

☐ Are the proper institutional identification numbers, applicant name, address, authorized official, university contact being used?

☐ Does the budget conform to any limitations imposed by the sponsor (e.g., salary caps, prohibitions on the purchase of equipment, etc.)?

☐ Are the objectives specific and measureable?

☐ Are proposed salaries and benefits within the University ranges and appropriate to the anticipated effort? Are reasonable increases budgeted for multi-year proposals?

☐ Are accurate rates for fringe benefits and indirect cost used in all aspects of budgeting?

☐ If the proposal is for a training grant, have all required tuition and fee costs been included?

☐ Have cost sharing commitments been endorsed by the University official?

☐ If other institutions are participating in the proposal, have appropriate approvals from the participating institutions been obtained

☐ If other institutions are included, is the role of each institution clearly stated in the proposal to avoid misunderstanding and potential disputes?

☐ Is space available and assigned within the department?

☐ Has the application been reviewed and approved by the appropriate department chairperson, dean, and the Office of Sponsored Programs.

☐ If a proposal is to be submitted to a private foundation, the Development Office must be contacted for processing. Contact the Director of Corporate & Foundation Relations.

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Supplemental Funding Request

Agencies will often have additional funding available to support existing awards. PI's with current awards can contact their program officer to inquire about supplemental funding. If supplemental funds available, the program officer will guide the PI/PD through the requirements for requesting such funding. The PI/PD must work with the OSP to process the request for supplemental funding through the same process for submitting initial proposals (Proposal Process). NOTE: When processing the budget for supplemental funding, you must use the exact IDC rate used in the initial awarded budget. If the initial awarded budget was funded using the university's negotiated rate, the budget for the request for supplemental funding must be calculated using the university's negotiated rate.

Submission to the Agency

The agency announcements will provide guidance as to how proposals are to be submitted to the agency. Most proposals are submitted electronically through Grants.gov; NSF Fastlane or NIH ASSIST. Proposals may also have the option of being emailed or delivered through the U.S. mail service or FedEx, etc. When mailing proposals, they must be mailed well in advance of the due date set forth by the agency. If PIs/PDs need to use FedEx or any other private mail delivery service, the PI/PD or the department will be responsible for the mailing of the proposal. In last-minute emergencies, PIs/PDs who must use Express Mail may want to arrange to have the application delivered themselves, as working through their department/college could cause further delays.

OSP is responsible for submitting proposals through most agency portals since OSP is the official university office registered with the federal agencies. In very rare cases, an agency may have a portal for the individual PI/PD. If the application is to be submitted by the PI/PD, OSP will contact the PI to give them approval to submit. The PI/PD may not change the budget, budget justification, institutional commitment, project scope or effort of personnel in their proposal once OSP has given the approval to submit. Once submitted, the agency portal will provide a confirmation page with a proposal number. An OSP staff member will forward the confirmation page to the PI/PD. It is important that the PI/PD keep the agency confirmation page readily available since the proposal number is the only way the agency will be able to identify the proposal should communication be necessary to correct errors and/or respond to questions.

If proposals are emailed or sent through the postal service, the PI/PD must notify the OSP as to the date and time it was submitted. It is advised that you confirm receipt of the proposal and document for your records, the date and time the proposal was submitted.

The Office of Sponsored Programs hopes the information provided in this Pre-award section of the handbook has been informative and useful. Our best to you in reaching your research and program goals.

POST AWARD ADMINISTRATION

Congratulations on receiving your award! This section of the Principal Investigator (PI)/Program Director (PD) Handbook attempts to capture, simplify and organize critical information in an easy to use format that Delaware State University (DSU) faculty and staff can reference while managing federal grants and contracts.

Federal/State grant and contract management requires consideration of **financial** and **administrative** requirements and **compliance** regulations that **must** be taken into account with every new award. The primary goal in post award administration is effective and accurate management of the project and project funds to support the implementation of a project and facilitate a smooth closeout with little to no cause for audit scrutiny.

All federal agencies must comply with the requirements of the U.S. Office of Management & Budget (OMB). On December 26, 2014, in an effort to streamline the administrative requirements, cost principles, and audit requirements of federal awards; the OMB undertook a significant revision to regulations that govern federal grant activities. The OMB circulars pertaining to Higher Educational Institutions, Hospitals and Non-Profit Organizations (A-21- A-110 and A-133) were revised and combined with other circulars to form the "OMB Uniform Guidance" for the management of all federal grant awards. OMB 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards.

While each federal agency must adhere to the Uniform Guidance, OMB permits each agency to implement the requirements that best suit the agency's needs, which may result in differences from agency to agency. Also, a single agency may have multiple variations of a policy to cover specific grant programs. As a general rule, the Uniform Guidance Requirements must be applied in a consistent manner for Delaware State University to maintain eligibility for federal funding. Based on this consistency requirement, many of DSU's policies and procedures are designed to comply with the strictest federal standards.

Again, on behalf of the Office of Sponsored Programs (OSP), Congratulations. The OSP staff looks forward to assisting you with the successful management and implementation of your award.

Thank you

POST AWARD RESPONSIBILITIES

Principal Investigator/Program Director

The project is built around the idea and vision of the Principal Investigator's (PI)/ Project Director's (PD; therefore, he or she will have the central role and primary responsibility for achieving the technical success of the project. In addition, the PI/PD is responsible for complying with the financial and administrative policies and regulations of the award. A PI/PD may have administrative staff to assist them with the management of project funds, but the **ultimate responsibility** for managing of the award rests with the PI/PD. These basic responsibilities include but, are not limited to:

➢ Execute the project as outlined in the funded proposal, using sound management techniques.

➢ Carry out the project's financial plan as presented in the award budget, or make changes to the plan following federal/state and university policies and procedures.

➢ Report project progress to the sponsor according to the terms and conditions of the award and in a timely manner.

➢ Maintain an accurate record of project expenses.

➢ Maintain organized file copies of project documents (e.g. requisitions, personnel documents, approvals, pertinent correspondence, reports, data, etc.).

➢ Comply with all university policies and procedures related to project management, personnel practices and regulatory compliance.

➢ Comply with all applicable agency rules, regulations and/or terms and conditions of the award.

It is suggested that the PI/PD establish a working relationship with the agency program officer assigned to their project. New PIs/PDs should discuss potential questions <u>internally</u> prior to contacting the program officer. **NOTE**: Be aware that program officer's styles vary; some are very hands-on and like to answer questions and offer guidance and support while others prefer to be contacted as little as possible. Getting to know your program officer's accessibility and working style is very important to the management of your project. Understanding your award terms and conditions when contacting the agency is important as well. Some terms and conditions specify that all communication must be through the OSP. **KNOW WHAT IS REQUIRED FOR YOUR AWARD!**

Deans and Chairpersons

Deans and Chairs share ultimate responsibility for all sponsored grants and contracts conducted within their college/departments by providing continuous support and oversight. These responsibilities may include, but are not limited to:

➢ Assuring that departments have adequate facilities and other resources for achieving project goals and objectives;

➢ Assuring that faculty time commitments on sponsored activities do not conflict with other departmental or university responsibilities. In order for Time and Effort (T&E) on sponsored projects to be effective, Deans and Chairs must have an understanding of the importance of T&E compliance to the sponsored project and the University;

➢ Assuring that departments are complying with the various regulatory requirements of the federal/state agencies and the University as they apply to sponsored activities;

➢ If cost share/matching was approved by the College and/or Department, assure that the funds are available and are tracked according to federal/state regulations

Office of Sponsored Programs (OSP)

OSP partners with faculty and staff to provide central coordination and oversight of all federal/state sponsored program awards that come to Delaware State University. OSP is the office responsible for the overall administrative post-award management of all federal and state externally sponsored projects.

Although there are other university offices involved with the management of an award, OSP serves as the centralized resource to faculty, staff, and various administrators in all administrative areas of sponsored programs. OSP's primary roles in the award phase are to assist PIs/PDs with the management of their awards, protect the University from undue risk in sponsored programs, project monitoring, compliance, faculty/staff trainings and to serve as a liaison to federal and state funders. The OSP has at its core several varied responsibilities. Some of OSP's responsibilities include, but are not limited to:

➢ Provide orientation for new PIs/PDs.

➢ Reviews each award and documents the terms and conditions required for management in the OSP database(s).

➢ Provides Restricted Funds Accounting (RFA) with the award budget and obtains project budget numbers

➢ Ensures that all non-fiscal compliance requirements necessary to initiate the project (e.g., Conflicts of Interest, Responsible Conduct in Research) are completed and approved.

➢ Works with PIs/PDs to ensure Human Subjects and Animal Care and Use requirements (if applicable) have been established prior to release of funds for expenditure.

➢ Works with and on behalf of the PI/PD to negotiate all project-related agreements and modifications.

➢ Meets with PIs/PDs for a Post Award Meeting prior to the start of the project to review terms and conditions.

➢ Assist faculty with developing sub-award agreements, (if applicable).

➢ Verifies that sub-recipient partners are not on the Excluded Parties List (EPL).

➢ Assists with oversite of sub- awards and in some cases, has site visits with sub-awardees.

➢ Works with Restricted Funds Accounting (RFA), the University's General Counsel, Human Resources, Risk Management Office and other institutional offices in review and negotiation of all research/project related agreements.

➢ In coordination with other core offices with responsibilities in the management of sponsored programs, OSP can assist with developing institutional research policies and procedures and direct institutional systems and trainings to ensure compliance with federal/state management requirements.

➢ Reviews and approves project expenditures for allowability.

➢ In coordination with the PI/PD and RFA, OSP provides oversight as needed to ensure successful implementation of the project.

➢ Obtains signatures on required documents. **OSP is the only office to obtain the appropriate signatures on federal and state grant awards, contracts and cooperative agreements.**

➢ In coordination with the PI/PD, assists with budget revisions and requests for negotiating and/or modifying the terms of the award.

➢ Works with PI/PD on grant renewals and continuations, no-cost extensions, supplemental funding, etc.

➢ Works with RFA on the annual A-133 audit by providing administrative documents (i.e. progress reports, time and effort, etc.)

➢ Assist in the development of training and educational materials related to compliance (including university and agency policies, and federal and state laws and regulations).

➢ Works with PIs/PDs and other institutional offices to successfully close-out awards.

OSP is responsible for maintaining, on file, the original grant award documents. These documents may be hard copy and/or as part of the InfoEd Proposal/Grant award Tracking System. Some of the award file documents include:

- Original/Revised Proposal
- Agency Proposal Announcement
- Internal Processing Form
- Award Notification
- Award Budgets & Justificaction
- Award Personnel Documents
- Compliance Documents
- Sub-awards Agreements
- Award File Notes

OSP takes a comprehensive managerial approach and engages in the award life cycle from the time the University receives the award to the end of the project period and close-out of the award. The OSP staff are certified in grants management with the experience and expertise to assist you in successfully managing your award.

Office of Restricted Funds Accounting

The Office of Restricted Funds Accounting (RFA) works with the Office of Sponsored Programs, faculty and staff and other university offices to ensure financial compliance and the proper accounting of externally sponsored funds. RFA staff are responsible for assisting the PI/PD's with the fiscal management of their awards. RFA's role and responsibilities also includes, but are not limited to:

➢ Setting up award budgets in the University's Banner System and

the State of Delaware's accounting system

➢ Prepares and reconciles financial reports required by the funding agency

➢ Prepares monthly invoices following the reconciliation process (unless otherwise stated in the award documentation) and submits to the funding agency to request reimbursement of expenditures. There are four types of invoices: manual and electronic invoice, electronic request and intergovernmental vouchers

➢ Reviews cost sharing expenditures, and if allowable, documents those expenditures in the University accounting system

➢ Reviews financial transactions to ensure funds are available in the awarded project budget to support financial transactions

➢ Provides institutional leadership for financial reporting systems that support the management of sponsored project expenditures

➢ Fiscal liaison to federal and state agencies

➢ Works closely with auditors on the annual A-133 audit

➢ Performs final fiscal review of all expenditures on projects and fiscally closes the project after the project period has ended

➢ Prepares and provides information to financially close-out the grant award

➢ Ensures proper financial records are maintained during the project period and after the award ends according to the award terms and conditions and university policies.

The Office of RFA is responsible for cash management. In most cases, it includes a draw-down process for receiving funds from the funding agency. RFA has the policies and procedures for drawing down funds for the appropriate grant awards.

When the OSP receives the project budget numbers from RFA, each PI/PD is assigned an RFA Financial Administrator. The Financial Administrator is there to assist with all aspects of financial reporting on the project and shares responsibility for financial compliance.

TYPES OF AWARDS

Federal/State agencies use various documents **(grants, cooperative agreements, and contracts)** to officially notify an entity that their program/research is going to be funded. The agreement will specify the terms and conditions associated with the funds being awarded to the recipient. The type of agreement is determined by the types of deliverables and involvement of the agency.

Although very similar, there are differences that make each agreement unique.

Grant - A type of financial assistance awarded to conduct research or other programs as specified in an approved proposal. A grant award instrument is used when the principal objective is to accomplish a public purpose. Grants are associated with "assistance" type of funding. A grant agreement does not provide for substantial involvement between the federal agency or pass-through entity in carrying out the activity contemplated by the award. Normally with grants, the signature of the University's Authorized Official is not required for acceptance of the award. When grant funds are drawn down, it signifies award acceptance.

Cooperative Agreement – An award similar to a grant, but in which the agency's staff may have substantial involvement in the research and/or program activities once the award has been made. With most cooperative agreements, the President's signature (as the University's authorized official) is required as acceptance of the award. **NOTE: It is the OSP's responsibility to obtain signatures for acceptance of awards. PIs/PDs, Chairs and Deans, are not to sign an award document.**

Contract - A contract is a legal document for procurement of a product or service with specific obligations for both the sponsor and awardee. There are greater performance expectations associated with a contract; it usually has specific deliverables and milestones to be met and dictates how the contracting parties will interact with each other. Contracts may be called by a variety of names – Agreement, Purchase Order, Sub-award, Memorandum of Understanding, or Letter of Agreement. **NOTE: Contracts must be reviewed by OSP's Contract Specialist, the University's General Counsel and any other university administrator approval deemed necessary before requesting the President to sign accepting the contract.**

Memorandum of Understanding (MOUs) – A Memorandum of Understand (MOU) is a written agreement. An MOU is a non-binding agreement between two or more parties outlining the terms and details of an understanding, including each parties' requirements and responsibilities. When a contract is

too formal and a so-called gentlemen's agreement is too casual, an MOU may work perfectly.

Sub-award Agreement - A sub-award is a formal written agreement made between DSU and another institution or organization to perform an intellectually significant portion of the SOW (Statement of Work) under a DSU sponsored project. A sub-award must include a clearly defined significant SOW to be performed by the sub-recipient's personnel, using its own facilities and resources. The sub-recipient takes full responsibility for adhering to the terms and conditions of the sub-award including the flow down requirements of the funding agency. The sub-award assumes creative and intellectual responsibility and leadership as well as financial management for performing and fulfilling the sub-recipient's SOW within the sub-recipient's approved budget. PIs/PDs are not allowed to create any sub-award agreement committing the University. A sub-award, like a contract, is non-binding if it does not go through the appropriate review and approval process. **NOTE:** DSU may be the sub-award recipient under another institution. If your project is a sub-award under another institution, you will need to adhere to all the terms and conditions and regulations of the prime institution as stated in your sub-award agreement.

It is OSP's responsibility to obtain signatures for all awards.

GRANT AWARD NOTIFICATION

The first and most important document the University will receive will be the Grant Award Notification. **NOTE:** Some agencies may send a letter notifying the PI/PD of their proposal being approved for an award and that an official award will be forthcoming. **Only an official Agency Award Notification can be accepted by the University**.

> The President or his/her delegated representative formally accepts all awards and subsequent amendments. This authority is derived from Article VI, section 1 H of The Board of Trustees Bylaws.
>
> Any required amendments to grants and contracts are reviewed by the Office of Sponsored Programs (OSP) with the Principal Investigator/Program Director (PI/PD) and forwarded to the President (ARO), or his/her designee, for signature (see Article V 2E and Article VI, Section 1 H of the Board of Trustees Bylaws - page 23). Objections or questions pertaining to any amendments grants or contracts should be communicated to the Office of Sponsored Programs (x6810) for discussion and negotiation with the sponsor.

An official grant/contract notification may include:

 ➢ Recipient information (address, DUNS, EIN#, etc.)
 ➢ Award information (CFDA#, FAIN#, type of award, federal awarding agency)
 ➢ Grant/contract number
 ➢ Project title
 ➢ Award date
 ➢ Award period (project start and end date)
 ➢ Authorized total amount awarded or award amount for a budget period(s) if it is a multi-year award
 ➢ Award terms and conditions

Other information may include specific restrictions imposed on the grant/contract, special reporting requirements, and contact information for the agency's Program Manager and Grant's Officer. **NOTE:** In some cases, a Grant Award Notification/Contract will include the full document of the agency's term and conditions for the project, however, some award notifications will include only a web link to such terms and conditions.

When an award is initially made, changes affecting items such as the budget or the award period of performance are sometimes necessary. This change can be a request by the PI/PD or the agency prior to starting the project. While there is some consistency in federal agency regulations regarding post-award changes, each agency does have its own rules. Therefore, should a post-award change to the project be required, the PI/PD should refer to the sponsor guidelines and regulations and contact the OSP with specific questions affecting the change.

Grants

When the OSP receives a grant award document from a sponsor, the document is reviewed for consistency with the initial submission. If the award is consistent with what the PI/PD requested in the proposal, OSP's Compliance Officer will forward a copy of the award to the RFA to request a project budget number for the award. Once a budget number is assigned to the project, the number is sent to OSP. The PI/PD is sent a congratulatory letter and a request to schedule a Post-Award Meeting to review their award terms and conditions.

Contracts and Cooperative Agreements

Sponsored Contracts and some Cooperative Agreements are processed differently than grants. In the case of a federal/state contract (including sub-

contracts), the OSP Contract Specialist sends the contract to the PI/PD for review and approval.

The PI/PD should examine: the **statement of work, budget (indirect costs, matching, release time), reporting requirements, re-budgeting restrictions, required sponsor prior approvals, patent and copyright terms (if applicable), submission dates for continuation or renewal proposals and other provisions.**

Once the PI/PD and Contract Specialist have approved the document, the contract is forwarded to the University's General Counsel for final review and approval before being sent to the President or his/her designee for signature and acceptance by the University.

The OSP is responsible for negotiating appropriate remedies if an award fits into any of the following categories:

➢ If the contract contains provisions that are incompatible with the University's policies on sponsored activities.

➢ It is inconsistent with government-wide regulations for universities.

➢ It fails to include all the elements agreed upon prior to an award; or

➢ It requires significant modification to conform to a PI's needs.

➢ The sponsor significantly reduced the award budget from what the PI/PD requested.

Throughout the life cycle of a sponsored project award, OSP staff members work diligently to provide advice and technical assistance to faculty, staff and administrators regarding award management and agency compliance.

PRE-AWARD COST

In some cases, an agency will allow the University to incur allowable and allocable pre-award costs up to 90 calendar days prior to the award start date under what is called <u>Expanded Authority</u>. **It is important to note that any pre-award expenditures under the Expanded Authority are made at the University's (department) risk;** the funding agency has <u>no obligation</u> to reimburse the University if an award is not subsequently made or is made for a lesser amount than expected.

If the proposal announcement does not specify that pre-award cost is allowed, then the PI/PD should contact the project's grant officer and obtain approval in writing for pre-award costs. Approval must also be provided from the college or department that will assume the risk should the award not be

made, or awarded for less than the expected amount. This mechanism should only be used for costs that are **absolutely necessary** for the start-up of a research project. OSP may require a justification for the pre-award cost. Any requisitions submitted to OSP for approval as a pre-award cost must have documentation attached (i.e. approval from administrator or entity assuming the risk and, if needed, approval from the agency).

POST AWARD MEETING

The Post Award Meeting (PAM) can be extremely beneficial to the PI/PD and everyone involved in the management of the award. After the OSP Compliance Officer reviews the terms and conditions of the award, and if there are no discrepancies or questions; a copy of the award will be sent to the RFA office requesting the budget be set-up in the University's finance system and a budget number be forwarded to OSP. However, if there are questions involving the award (i.e., award budget is less than what was requested, agency has placed mandatory restrictions that may not coincide with the University's policies and procedures or changes in the scope of work or personnel that may make it difficult for the PI/PD to reach proposed goals), no budget number will be requested for the project until issues are resolved. **NOTE: If human subjects and/or animals are to be used in the grant/contract award and you have not received approval from the Institutional Review Board (IRB) or the Animal Care and Use Committee (IACUC), no budget number will be released until approvals are received.**

Once OSP receives the budget number; a congratulatory letter is sent to the PI/PD requesting them to contact the Compliance Officer to schedule their Post Award Meeting. It is the Compliance Officer's responsibility to organize the meeting with the PI/PD, RFA Financial Administrator and anyone else the PI/PD or the Compliance Officer deems necessary to attend. Should the award be a contract or a grant with sub-awards, the OSP Contract Specialist will attend the meeting to guide the PI/PD through any special conditions regarding the contract deliverables and/or documents needed to develop a sub-award agreement.

During the meeting, the Compliance Officer and the RFA Financial Administrator reviews the award terms and conditions with the PI/PD along with their responsibilities to Delaware State University and to the agency while participating in sponsored activities. It is also a time when those involved in the management of the award have an opportunity to understand everyone's role in managing the project successfully.

To assure that the entire terms and conditions of the award are discussed, the Compliance Officer will use a <u>Post Award Checklist</u> to review the following:

- Budget and budget justification
- Effort Reporting process and forms to be used
- Award Terms and Conditions, including technical, fiscal reporting, and any special requirements
- Hiring project personnel (if applicable)
- If the award is a multi-year award, discuss approval of any carryover of unobligated funds, and no-cost extensions
- Requisitions for supplies and/or equipment
- Travel regulations (which includes student travel) and Fly America for international travel
- Monitoring of project expenditures
- Sub-award agreements (if applicable)
- Institutional Review Board (IRB) (if applicable)
- Institutional Animal Care and Use Committee (if applicable)
- Financial Conflict of Interest
- Responsible Conduct in Research (RCR) documents
- Patent, copyrights and publishing (if applicable)
- Export Control requirements (if applicable)
- Project Close-out
- Document Retention

The Post Award Meeting is the time for PIs/PDs to ask questions and to express any concerns they may have with managing the award. Once all aspects of the award have been reviewed and discussed, the Post Award Checklist is signed by all those in attendance and a copy is provided to the PI/PD, and the Financial Administrator with the original filed in the OSP. At this time, the project budget number is given to the PI/PD.

As work continues on the project in the post-award phase, any questions related to the award's budget, terms and conditions and/or regulatory issues should be directed to the Office of Sponsored Programs for administration and/or the Office of Restricted Accounting for financials as these offices are your chief contacts and are available to assist.

STARTING YOUR PROJECT

You now have your budget number and are ready to start your project. Knowing where to locate resources, pertinent information on what is or is not allowable for expenditures, procedures for hiring project personnel, to making sure required assurances and certifications are complete and on file are critical to the successful management of your award.

Federal and state agencies look at project management as a large puzzle

and if one or more of the puzzle pieces are missing, then your project is not in compliance and you are viewed as not being a good steward of the funds you have been awarded. This may negatively affect your current award and any future funding. The following was discussed during your Post Award Meeting; however, as a refresher, let's begin to take a look at some of the puzzle pieces that may make up your award.

Hiring Project Staff (Personnel)

Delaware State University is an equal opportunity employer. All educational and employment activities are administered without discrimination because of race, color, religion, national origin, age, or sex (except where exempt) in accordance with all local, state, national laws, executive orders, regulations and guidelines.

When project personnel (including the PI/PD) are to be hired on a sponsored activity, the PI/PD must initiate the hiring request(s) using the appropriate hiring policies and procedures related to DSU employment. Personnel hired for a sponsored program activity receives employee benefits consistent with their terms of employment and the University policy.

If your award is requesting staff to be recruited and hired from outside of the University, you will need to contact the Office of Human Resources to obtain assistance with the appropriate procedures for:

> ➢ Initiating a Position Requisition in the Hiring Database to post the position
> ➢ Interviewing potential candidates.
> ➢ Making an offer for employment **(only done by Human Resources)**
> ➢ Background checks **(only done by Human Resources)**
> ➢ Initiating the Approval to Hire Memo
> ➢ Initiating the Personnel Action Form (PAF)
> ➢ New hire orientation

In some cases, you may need to actively recruit Faculty, Post Doctorial staff, Research Associates/Technicians, etc., to work on the project. Under the OMB Uniform Guidance 2 CFR 200.463, recruiting is an allowable expense; however, it must have been requested and approved in your award budget.

If the appointment is a supplemental assignment to a DSU employee, the duties and time for performance must be clearly described in a memo to HR, and a job description must be submitted for HR approval. If the employee is a classified employee, there are Union guidelines that must be followed for the appropriate pay rate, etc. Federal regulations require an auditable record of time spent for all employees paid a salary and wage in programs sponsored by federal agencies. How to certify that effort, will be discussed later in this Handbook (section on Effort Reporting).

All requests to hire personnel must be entered into the Hiring Database as a **Personnel Action Form (PAF)** and routed through the Hiring Database System to obtain required approvals. **NOTE:** Permission to use the Hiring Database must be obtained from the Office of Human Resources. If you as the PI/PD, are not going to enter the request to hire personnel into the Hiring database, then you may need to request assistance from your department and/or college.

The hiring approval process must be completed before any action is taken to fill a vacancy. The employee will **NOT** begin employment until all pre-employment documents are completed and processed. **PI's/PD's**, **DEANS, PROGRAM DIRECTORS AND/OR DEPARTMENT HEADS ARE RESPONSIBLE FOR ENSURING THAT NO ONE IS ALLOWED TO WORK FOR THE UNIVERSITY UNTIL ALL REQUIRED PROCEDURES HAVE BEEN CARRIED OUT**.

Student Employees

If undergraduate and/or graduate students are to be employed as project staff on a funded project, PI/PDs must go on-line and sign into the University's Student Employment Office's (SEO) hiring system. The Student Employee Office will be able to assist you with:

> - Posting available job positions
> - Reviewing applications
> - Hiring process for student employees
> - Employment guidelines and required documents
> - Job classifications
> - Wage guidelines
> - Student employment paperworks
> - Pay periods and paycheck
> - Performance evaluations, etc.

NOTE: Understanding the student's role and involvement in the project, as stated in the proposal and award budget is important. Student employees and student participants are different classifications. The paperwork and processes to hire a student under student payroll is different than the process to provide a student participant with a stipend for training on a project.

A **student** who is **working on a job** while attending school is a student employee. A student employee is a part-time temporary employee who, in the case of a sponsored project, is hired to work in a variety of capacities that can help provide fast and efficient service to the project. The student employee's primary purpose must actually be working on the project as an employee and not as a participant in training on the project. The student employee is listed in the personnel line of the budget along with other project staff. As a PI/PD, you are providing a student an opportunity to develop work habits, skills, and contacts that can serve the student and the project.

Student Participants

Student participants are students **participating** on a project as trainees **(but not employees)** that can receive a stipend for their participation in the project if it is a part of the award budget. Stipends for student participants are listed under the participant cost line of the budget. **The request to pay student participants is submitted on a university requisition and processed through the Accounts Payable Office.** Contact your Financial Administrator as to the pertinent information required on the requisition for student participants to receive their stipend. **Note:** For more information on International students with a F1 and J1 Student VISA status, please contact the Office International Affairs.

Purchasing

As a PI/PD you will need to obtain equipment, supplies, parts and services from commercial and university sources to conduct your project. It is the responsibility of the PI/PD to ensure that purchases are allowable within the agency and university guidelines and OMB 2 CFR 200 Sub Part E Cost Principles.

All sponsored project purchases must be conducted in a manner that will provide open and free competition to the maximum extent practical and consistent with applicable federal cost principles and DSU's policies. PIs/PDs involved in the expenditure of public funds are held to the highest degree of public trust. No PI/PD (or their designee) shall engage in or permit any illegal or improper purchasing practices, including but not limited to the following:

> - Kickbacks (Reference the Anti-Kickback Act and Public Law 99-6334)
> - Submission of equal or rotated bids
> - Conflicts of Interest
> - Acceptance of gratuities
> - Participation in any community financial interest with bidders
> - Elimination of competition or restraint

Purchasing Card Program (P-Card)

The University has a Purchasing Card (P-Card) Program. The program is designed to reduce numerous processes including petty cash, low dollar checks, cash advances, and small-dollar purchase orders. The P-Cards are similar to credit cards; however, payment is not made directly by the person using the card but by the University. Although when issued, each card will have the name of the PIs/PDs name on it, it is the property of the University and is to be used **ONLY** for university purchases. The P-card will be attached to your sponsored project budget number for you to use on supplies, services and some equipment that are approved in your project budget.

IMPORTANT: The P-card is not meant to circumvent the purchase requisition process and should only be used for purchasing items allowable under the University P-card policy . P-card users who use the cards to purchase items umallowable under the University P-card policy will be subject to card suspension and further disciplinary actions. The policy for obtaining and using the P-Card includes the following guidelines:

> - Applying for a Purchasing Card
> - Training Requirements
> - Purchasing Card Policy Enforcement, etc.
> - Obtaining the Purchasing Card
> - Establishing a purchasing limit

Before requesting a P-card for your sponsored project(s), discuss the request with your Department Chair and/or Dean; as each college has its own policy on who is allowed to obtain a P-card. For the full policy on university P-cards visit Purchase Card Policy (P-Card). **NOTE**: P-cards can be suspended or terminated at any time by the University for non-compliance with policies and procedures.

Requisitions and Purchase Orders

Delaware State University requires that a requisition describing the goods and/or services desired be prepared in <u>advance</u> of every purchase and entered into the University's Banner System. An authorized individual must sign the requisition which must identify the project budget number, name of the vendor, name of the purchase, and the account classification of the purchase by object code. A listing of object code numbers are available by contacting your Financial Administrator in the Office of Restricted Funds Accounting. Please call the Purchasing Office at Ext. 6270 with any questions regarding coding of requisitions. **To comply with DSU internal controls, the hard copy of the requisition must be forwarded to OSP for review and approval by the OSP Grant Accounting Administrator. OSP will sign the hard copy and approve the requisition in the Banner System. When the hard copy of the requisition has been signed, OSP will contact you (or your designee) to pick up the signed copy for your records. All backup document will need to be scanned and emailed to the Purchasing Office for processing of that requisition.**

After a requisition is entered and approved in the Banner system, and competitive prices have been obtained (if applicable); the Purchasing Office will issue a Purchase Order number to the vendor. When using this method, **PIs/PDs (or their designee) must not place orders directly with vendors. A requisition number is not a valid purchase order.**

Capital Expenditures/Equipment

Purchasing capital expenditures and equipment can become very confusing. Especially when dealing with contracts for services such as a building renovations or purchasing large scientific equipment. Understanding the university's polices and bidding procedures is essential. Contact the Purchasing Office for assistance with any questions regarding the purchasing of capital expenditures/equipment.

No requisitions for capital expenditures or equipment will be accepted less than 45 days before the project period ends unless the PI/PD has an explicit justification and approval from the agency. **NOTE:** The Purchasing Office has the right to change vendors, but not items. This may be necessary due to competitive pricing or delivery.

Bidding Procedures

Delaware State University abides by the State's bidding procedures. The State of [Delaware's Procurement Portal](#) is an all-inclusive site providing information on how to do procurement business with the state.

Purchasing of Capital Expenditures (Equipment)

TITLE 29

State Government

Budget, Fiscal, Procurement and Contracting Regulations

CHAPTER 69. STATE PROCUREMENT

Subchapter I. General Provisions

(17) "Materiel" means materials, equipment, tools, supplies, or any other personal property, but does not include real property or electric, gas, water, telephone or similar utilities.

(19) "Professional services" means services which generally require specialized education, training or knowledge and involve intellectual skills. Examples of professional services include, but are not limited to, engineering, environmental engineering, environmental monitoring, land surveying, landscape architecture, geology, architectural, archaeologists, architectural historians, historians, educational consultants, management, medical, teaching, planning, computer information management, financial, accounting, auditing, construction management and arbitration services. Professional services subject to the provisions of § 2507 of this title or which require compliance with Delaware Supreme Court Rule 52 or a substantially similar rule of another state shall not be included in this definition and shall not be subject to this chapter.

(22) "Public works contract" means construction, reconstruction, demolition, alteration and repair work and maintenance work paid for, in whole or in part, with public funds.

Procurement Thresholds

Find them on http://mymarketplace.delaware.gov

Procurement Classification	Spend Range 1 (under threshold)	Spend Range 2 (under threshold)	Spend Range 3 (over threshold)
Materiel & Non Professional Services	Less than $10,000 (annual spend) ★ Open Market Purchase	$10,000 - $24,999 (annual spend) 3 Written Quotes	$25,000 and over (annual spend) Formal Procurement (RFP/ITB)
Public Works	Less than $50,000 (term of contract) ★ Open Market	$50,000 - $99,999 (term of contract) 3 Written Quotes	$100,000 and over (term of contract) Formal Procurement
Professional Services	Less than $50,000 (term of contract) ★ Open Market	N/A	$50,000 and over (term of contract) Formal Procurement

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Procurement Classifications

- <u>Materiel and Non-Professional Services</u>
  - Products & Commodities (Tools, Fuel, Foods, Clothes, etc.)
  - Generic Services (Carpet Installation, Courier Service, etc.)
- <u>Professional Services</u>
  - Services requiring specialized education, training, or knowledge (engineers, medical, consulting, etc)
- <u>Public Works</u>
  - Work or service that "touches" or affects public buildings or grounds (construction, alteration, repair)

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The Purchasing Office reserves the right to withhold payment to the vendor until all proper bidding documentation is received. All purchasing documentation for equipment over $10,000 will be filed in the Purchasing Office.

The Purchasing Office is available to render assistance to you in fulfilling your needs by obtaining the lowest possible price for each purchase made by the University.

Purchasing Computers

If purchasing a computer(s) is part of your approved budget, **computer purchases must be consistent with standards set forth by the University.** Therefore, before purchasing a desk top or laptop computer for your sponsored project, please call the DSU Help Desk for assistance (ext. 7028).

Travel

DSU faculty, staff and students routinely travel in support of sponsored activities. **Travel is allowable as a direct cost when such travel is approved in the project budget and will provide a direct benefit to the award**. All awards are subject to specific agency restrictions, as well as Delaware State University's Travel and Expense Policy. The terms and conditions of the award should be reviewed prior to submitting a Travel Authorization (TA) Form for approval to travel and incurring any travel costs.

The University reimburses travelers for necessary and reasonable business expenses incurred while traveling. The University uses the General Services Administration (GSA) to calculate per diem rates for meals and mileage throughout the country. These GSA rates are set each year on (October 1st) the GSA Per Diem Rates website. Reimbursable expenses must conform to DSU's Travel and Expense Policy, federal and state law, and any restrictions placed by the agency upon each sponsored award.

DSU has a travel card program that is intended to reduce the administrative burden of processing travel and business related payments and reimbursements. The policy provides guidelines under which university employees and non-employees will be reimbursed for travel and business related expenses. The policy includes guidelines for the following:

➢ Applying for and obtaining a travel card
➢ Travel card limits
➢ Training requirements
➢ Responsibilities of cardholders, approvers, and other

departments
➢ Allowable and unallowable expenses
➢ Approvals for travel requisitions and submission of reimbursements
➢ Acceptable use of travel cards
➢ Administrative actions as a result of policy violation and inappropriate use of the travel card

See the University's University Travel Policy for more detailed information on travel prior to submitting the required paperwork for travel and approval of reimbursements on a sponsored project.

Travel Authorization Form

A DSU Travel Authorization (TA) Form should be submitted to OSP (with appropriate signatures) in a timely manner. The TA takes time to go through the approval process; therefore, submitting the TA as early as possible is in the travelers best interest for staying in compliance. **Travel must not take place prior to having an approved TA**. **NOTE:** When travelling on University business, the TA serves as approval that the travel is business related should anything happen (accident, illness, etc.). The TA must have:

➢ Name of the staff person traveling (this person must be associated with the project)
➢ Date of the authorized travel
➢ Employee "D" number
➢ Budget number to be charged
➢ Dates of departure and return
➢ Where you are traveling and the purpose of the trip
➢ Number of staff and/or students traveling (if applicable)
➢ Name of your lodging, address and phone number
➢ Estimates for airfare, mileage, car rental, lodging, meals; registration fees and miscellaneous expenses (tips, taxis, etc.)
➢ Supporting documents attached, including the meeting or conference agenda and the planned airline and hotel itineraries
➢ Appropriate signatures, the TA Form must have all signatures prior to submitting the form to OSP for approval)

After the TA form has been signed by the traveler, PI/PD, immediate supervisor, the traveler enters the travel information into Banner to generate a requisition number (the original TA form comes to OSP for approval). **NOTE: Each university employee has their own travel card; therefore, no one is allowed to pay for someone else's travel on their travel card. This does not apply to students.**

Student Travel

Students approved to travel on a sponsored project must go through the same process as faculty and staff. However, undergraduate students normally travel with either the PI/PD or supervisor; therefore the undergraduate student's information may be included on the PIs/PDs and/or supervisor's TA Form. Graduate Students may travel on their own for presentations, workshops or to attend required conferences. The graduate student will complete a TA Form with their signature and the signature of the PI/PD approving the travel.

As with all expenditure approvals, when OSP receives the hard copy of the TA Form, the OSP Grant Accounting Administrator (or OSP designee) will review the form for completeness, verify the travel is a part of the award budget, sign the TA Form and approve the travel in the Banner System. Once the TA Form has been approved, faculty, staff and students can proceed with making their travel plans.

Foreign Travel

PIs/PDs, planning any type of foreign travel, must become familiar with the Fly America Act. The Fly America Act is applicable to all travel funded by the U.S. Federal Government and requires the use of "U.S. flag" airlines (not to be confused with flag carriers) with a few exceptions. These individuals include, U.S. federal government employees, their dependents, consultants, contractors, **grantees,** and others.

The definition of foreign travel may differ from agency to agency. For example, many agencies do not consider travel to Mexico and Canada to be foreign travel. **However, even though the agency may not consider Mexico and Canada foreign travel, within DSU's internal controls, you will still need to work within the Fly America Act policy when booking any airline travel outside the U.S.**

Under the Fly America Act travelers are required to use a United States (US) air carrier service for all travel funded by federal agencies. An exception to this requirement is the Open Skies Agreement. There are four Open Skies Agreements with the United States currently in effect: European Union (EU), Australia, Switzerland, and Japan. The Open Skies Agreement exception does not apply to travel funded by the U. S. Department of Defense.

Travel between the U.S. and another country

- If a U.S. flag air carrier offers nonstop or direct service (no aircraft change) from your origin to your destination, you must use the U.S. flag air carrier service unless such use would extend your travel time, including delay at origin, by 24 hours or more.

- If a U.S. flag air carrier does not offer nonstop or direct service (no aircraft change) between your origin and your destination, you must use a U.S. flag air carrier on every portion of the route where it provides services unless when compared to using a foreign air carrier. Such use would:

  - Increase the number of aircraft changes outside the U.S. by 2 or more.
  - Extend travel time by 6 hours or more.
  - Require a connecting time of 4 hours or more at an overseas interchange point.

NOTE: All travelers who have a qualified exception, including the <u>Open Skies Agreement</u>, must complete a <u>Fly America Act Waiver Checklist</u> for Federal Funds and attach it to their Travel Authorization Form for approval prior to completing or booking travel.

For PIs/PDs not accustom to foreign travel, the Fly America regulations can be very confusing. Contact OSP with any questions regarding foreign travel.

<u>NOTE</u>: Following the award terms and conditions and the University Travel Policy is extremely important. Sponsored project travel has a high audit profile. Therefore, each transaction must be adequately documented. Sufficient documentation provides clarity so that anyone reviewing the transaction can verify that the travel is allowable, allocable and reasonable. **If costs are not allowable, allocable reasonable, consistently treated and sufficiently documented, they cannot be charged to a sponsored project**.

<u>Participant Cost</u>

Upon receipt of an award that includes Participant Support Cost, the Principal Investigator is informed at the Post Award Meeting of the specific restrictions governing the expenditure of these funds. Restricted Funds Accounting (RFA) will create separate codes in the University's financial

system. Awardee organizations must account for participant support costs separately. The use of separate participate cost codes isolates participant cost, makes them easily identifiable, restricts budget changes and easier to audit.

Delaware State University's Participant Cost Policy and Procedures are in accordance with the National Science Foundation's requirements. Participant support cost provided by sponsors other than NSF will follow the same requirements as specified in this policy unless an award specifies otherwise.

The PI/PD is responsible for reviewing project budget reports, transactions, and source documents (including attendance sheets for all attendees/particpants) to ensure that the participant support funds are being expended according to federal regulations and the terms and conditions of the agreement and university internal controls.

Funds provided for participant support may not be used by grantees for other categories of expense without the specific prior written approval of the awarding agency.

Sub-Award Agreements

A request to initiate a sub-award should be processed when a sub-award has been formally approved by a sponsor, either as part of a formal award action or after an award with the prior written approval of the award sponsor.

The PI/PD shall be responsible for confirming that the sub-recipient performs the award scope of work and all project costs are reasonable and in accordance with the terms and conditions of the sub- award.

As a condition to acceptance of funding from a sponsor, the PI/PD and the University is obligated in its role as recipient of the primary award to undertake stewardship to ensure compliance by the sub-recipient with federal, state and local laws and regulations with the same restrictions placed upon the primary award by the sponsor. This process is referred to as the "flow down" process which basically means, the sub-recipient must comply with the same terms and conditions as DSU unless otherwise specified in the sub-award agreement. When the University assigns responsibility for conducting a portion of the work under the primary award to the sub-recipient, the University remains responsible to the agency for managing the funds and meeting performance goals. This responsibility involves:

➢ Pre-award risk assessment of the proposed sub-award and sub-recipient will consist of, but is not limited to:
- Sub-awardee A-133 audit findings
- Previous history with DSU and other Institutions
- The complexity or requirements of the award in relation to the scope

of work
- The international/domestic location of the subaward or subrecipient
- The capabilities of the subrecipient's financial system and tracking of expenditures
- Federal Debarment or Suspended List (SAMS, APHIS, etc.)

In the sub-award agreement, informing the sub-recipient of all applicable federal laws and regulations and all appropriate flow-down provisions from the prime award agreement.

➢ Post award monitoring of the programmatic and financial activities of the sub-recipient under the sub-award.

➢ Reviewing sub-recipients' federal audit results and if necessary, reviewing any corrective actions cited by the sub-recipient in response to their audit findings.

➢ At the award close-out, determination that applicable administrative tasks, project work and financial requirements of the sub-recipient has been satisfied with DSU.

OSP is the office responsible for assisting PIs/PDs with developing sub-award agreements. The OSP Contract Specialist will provide you with the sub-award procedures, the Sub-award Request Form and discuss the requirements of the sub- award agreement. An approved requisition to encumber the funds are needed and the PO# may be required on the contractor sub-award. **Under no circumstances does a PI/PD have authorization to develop, sign or submit a sub- award agreement to a sub-recipient.**

Once the PI/PD completes and submits the Sub-award Response Form to OSP and if the Contract Specialist has no questions, the Sub-award agreement is developed. The OSP Contract Specialist will forward the agreement to the PI/PD to review and verify that information within the agreement is accurate. The agreement is then forwarded to the University's General Counsel for review and approval prior to the document being sent to the President for final signature as the authorized official for the University. **NOTE:** DSU follows the same process as stated under the sub-award section of this handbook for sub-contracts.

Contractual Services

If you have an approved contractual line in your budget, your project requires some type of contractual services. If hiring consultants are a part of

your award, before you are allowed to enter into any agreement with a consultant, contact the OSP Contract Specialist for assistance in preparing the **Consultant Contract Agreement. No consultant can begin work on a project without a signed Consultant Contract Agreement.** Other types of contractual services are but not limited to the following:

- ✓ Maintenance, repair and alterations of buildings or equipment
- ✓ Sample preparation, testing and analysis
- ✓ Statistical consulting
- ✓ Printing services
- ✓ Shipping/handling and storage
- ✓ Publicity and advertising
- ✓ Employee or student training
- ✓ Food services/catering

The same requisition process as explained under the Purchasing section is used for contractual services. An approved requisition to encumber the funds is needed and the requisition # may be required on the contract. **NOTE:** If your award budget does not have a contractual line, you may need to contact the grant officer for prior approval. Should you have any questions, contact the OSP Grant Accounting Administrator for assistance.

Cost Share/Matching

When an award is made, all proposed cost sharing commitments are now represent binding obligations of the University. DSU must ensure that all cost sharing commitments (mandatory and voluntary) made as a condition of the award are accounted for as a cost of the project, and are separately identified and reported.

Cost Share/Matching requires that the University maintain sufficient supporting documentation to satisfy an external auditor and the sponsoring agency. It is the responsibility of the PI/PD and the Office of Restricted Funds Accounting to monitor and track all cost share/matching commitments. Contact your Financial Administrator for questions and assistance.

Indirect Cost

Should your award include indirect cost, contact your Financial Administrator in the Restricted Funds Accounting Office to work with you on setting up a PI/PD account and to provide you with the budget number. **NOTE: The budget number for the PI/PD account is separate from your project budget number and is managed by the Office of Finance Administration.** Any questions related to indirect cost during the Post Award period should be directed to the Financial Administrator.

POST AWARD MANAGEMENT

Your project has started, your staff and students are in place, equipment and supplies have been received, consultants are hired and all required assurances and certifications have been submitted to the appropriate offices. ***NOW IT'S TIME TO MANAGE YOUR AWARD!***

The management of sponsored projects are critical in maintaining the public trust in research/program results and outcomes, participants, and how grant funds are spent. Post award management is the process that encompasses the involvement of the University, and the sponsor's policies and procedures pertinent to the administration of a sponsored project. It is also referred to as the post-award administration phase in the life cycle of an award. At DSU various individuals, colleges and offices must work together throughout the lifecycle of an award to effectively manage sponsored projects. Your job as the PI/PD is to faithfully and diligently carry-out the sponsored project (including sub-award monitoring) according to the terms and conditions of the award.

Information in the following sections is intended to assist PIs/PDs in managing the project according to federal, state and university regulations and policies.

Sponsored Project Approvals

Expenditure Approvals

The OSP Grants Accounting Administrator (or designated OSP staff) reviews all sponsored project expenditures in accordance with cost allowability principles found in the agency guidelines, OMB 2 CFR 200 Sub Part E Cost Principles, the terms and conditions of the award, the agency approved project budget and university policies and procedures. All expenditures such as personnel, supplies, equipment, travel, contractual services, participant costs, etc., must come through the OSP via a hard copy signed by the PI/PD and entered into the University financial sysem (Banner and/or Hiring Database) for approval before a purchase or travel is completed.

Once a requisition or travel authorization has been approved by OSP and has gone through the process in Banner, the PI/PD and/or appropriate project staff are able to proceed with the purchase and/or travel. In hiring project staff, the Personnel Action Form (PAF) must come to OSP via the University Hiring Database and be approved prior to any staff starting work on the project. **NOTE:** This prior approval does not include purchases on the P-Card. **Travel can not be placed on the University P-Card.** Approval of P-Card

purchases is completed after the purchase. P-card purchases are approved by OSP electronically in Centresuite as an expense report submitted with supporting documentation. It is extremely important that, if needed, before using the P-Card you verify the purchase is an allowable expense. **Any purchases, travel or hiring of project staff that are not allowable are the responsibility of the PI/PD.** Any questions concerning allowability should be directed to the Office of Sponsored Programs.

Making Changes to the Project

There may be times when you will need to make a request to make changes and/or additions to your project. When your grant officer affirms a request and if you have made that request in person or over the phone, make sure to confirm approval by following up with a written email documenting the conversation and asking them to confirm approval through a reply. This is very important as program managers and grant officers can change during the life cycle of a project and there is enough variation in agency policy for one grant officer to approve a request while the next one may be inclined to deny it. **ALWAYS** protect yourself and the project by documenting in writing any discussions, approvals, or rejections of requests. These, along with the original grant, become the supporting document's on of what can and can't be done with grant funds awarded for your particular project.

Frequently, projects change or evolve from how they were initially proposed or awarded by the agency. While some changes occur over the life of the project, any change that constitutes a redirection of the statement of work (and associated budget) included in the original proposal should be discussed and approved in advance with the agency program manager.

 The level at which approval may be granted depends upon the type of award and the agency's terms and conditions governing the award. Written communication must be sent to the sponsor regarding a proposed change, with a copy to OSP and your RFA Financial Administrator. Carefully review your award terms and conditions, OSP Post Award Meeting Notes and the sponsoring agency guidelines.

Significant changes representing a change in scope will always need agency approval. **No changes should take place until approval (in writing) has been received from the sponsoring agency.**

Re-budgeting

Re-budgeting is the re-allocation of funds between account lines.   The awarded budget is a good faith estimate of the resources DSU will need in order to complete the proposed scope of work. Most agencies recognize that as

projects move forward the needs of the project might change. The PI may need to hire more staff, there may be a need for more supplies or an essential piece of equipment might break.

These changes may not be a problem for the sponsor; however, the requirements for how to make these changes varies from agency to agency and even from project to project. The award terms and conditions and/or agency guidelines will dictate the answers to the questions: Who has the authority to make the changes and does the sponsor require prior written approval?

In general, there are three types of re-budgeting that require prior approval: (1) transfer of funds from or to a category that require approval (e.g., participant costs, personnel or equipment); (2) transfers that would change the character/scope of the project and; 3) transferring funds to a line item that is not apart of the approved budget (e.g., the need to transfer funds to a contractual line when there is not a contractual line in the approved budget). Transfers that do not affect the above (1-3) normally do not require prior approval. For example, re-budgeting $1,000 from travel to supplies normally does not require prior approval unless otherwise specified in the terms and conditions.

Except for the amount of salaries, (as pre-approved by the funding agency), participant costs and some types of equipment, re-budgeting can be approved internally by the Office of Sponsored Programs **and** the Office of Restricted Funds Accounting. Requests for salary adjustments reflecting effort reductions in excess of 25% or as specified by the funding agency, or exceeding the authorized level in the award document must be approved by the appropriate funding agency (in writing), and may require approval of the department Chair and/or Dean and Human Resources.

PIs/PDs are responsible for initiating the re-budgeting process and should consult the Office of Sponsored Programs and/or Office of Restricted Funds Accounting with questions regarding re-budgeting. OSP must sign all budget transfer forms for sponsored projects. The Office of Restricted Funds Accounting receives the final approved transfer document (if applicable, with the written agency approval attached) for processing the budget transfer.

All Budget Transfer Forms must include the budget lines and dollar amounts to be transferred, as well as the reason for budget transfer request. The reason for budget transfer request must provide sufficient explanation for the transfer including the reason the funds are available in the line that funds are being transferred from and the reason funds are needed in the line that funds are being transferred to. (Example – a budgeted trip was cancelled leaving funds in the travel line. Unanticipated supplies are needed; therefore, the Budget

Transfer Form is requesting that funds from the unused travel be transferred to the supply line).

IMPORTANT: Federal regulations and DSU's policies and procedures do not permit co-mingling of funds (cost transfers/expenditure reclassifications) between awards.

Budget Carry Over

Being allowed to carry over funds that are unspent at the end of the budget period in a multi-year project are dealt with differently by the various agencies. If it is not clearly stated in your award terms and conditions that carry over of funds to the next budget period is allowable, OSP should be consulted for the specific award and agency requirements. Should you need to obtain an approval, contact the project's grant officer for approval to carry over funds. **A request to carry forward funds should be in writing with a explanation as to why there are funds left in the current budget period and how the carry-over funds will be used in the next budget period.** If the agency provides written approval, the approval should be attached to the budget transfer prior to submission to OSP. **NOTE: The agency may ask you to submit a line item budget for the carry-over funds.**

No-Cost Extension

The PI/PD is expected to complete work under sponsored agreements within the project period specified in the award. However, if the PI/PD needs additional time to complete the approved scope of work, using existing funds, the sponsor may consider a request to extend the expiration date of the award at no additional cost. **Federal sponsors do not consider funds remaining at the end of the award as sufficient justification for an extension of time. Requests for no-cost extensions shuld be framed in terms of completing or extending the aims of the project.** Some federal agencies under the guideline of "expanded authority" allow the University to grant a one-time, up to one year, no-cost extension so long as a notice is sent to the agency in a timely manner. Reasons for granting an extension may include: 1) time to complete or extend the scope of work; 2) a request for funds to continue the project or; 3) to allow time to finish closeout procedures. Normally, no single extension may exceed twelve months and only in exceptional cases will more than one extension be granted.

NOTE: It is important when requesting a no-cost extension to always include an explanation of the need for a time extension and a brief statement of how the residual funds will be used during the requested period of extension. In some cases, an agency may request that a budget be submitted for the

remaining funds.

Most agencies have specific deadlines for requesting a no-cost extension. As soon as you know a no-cost extension may be needed to successfully complete the project; review the agency deadline dates for requesting a no-cost extension. Some agencies vary from 60 days to as little as 10 days prior to the project end date. The following information must be included in the request:

- Award Project Title
- Award Number
- Proposed Revised End Date
- Justification for the request
- How residual funds will be spent (including figures)

Supplemental Funding

Request to supplement awarded funds should be treated as a "mini-proposal". A budget showing how the funds will be spent and an explanation of why they are necessary and relevant to the research must be included in the request. All supplemental requests must be processed through the Office of Sponsored Programs.

Grant Award Reporting

All technical grant award compliance according to the terms and conditions of the award agreement are managed in OSP. The Principal Investigator is responsible for working with OSP staff to ensure all technical matters are compliance. The Compliance Officer will work with other OSP staff on portions of the required reportings inorder to monitor overall grant award compliance.

The Compliance Officer sends out quarterly compliance memos to every PI with the status of their compliance. This helps to keep the lines of communication open for any obstacles that may be preventing full-compliance. If the PI does not respond to the 1st status of compliance letter; a 2nd letter is sent after 30 days. If full compliance is not met after 60 days, grant expenditure approvals are suspended until compliance requirements is met.

Property Management

Property management on sponsored projects at DSU is normally referring to the purchase of equipment and are fixed assets. Fixed assets are defined as tangible property items, having an estimated life of more than one year, and be of significant value. The federal threshold for asset tracking is **$5,000 and up**. DSU's policy for fixed assets abides by the federal threshold of $5,000. All equipment purchased by grant funds is labeled with DSU identification tags by the University's Central Receiving Office staff. For more information on property management, review the Fixed Asset and Inventory Management Policy.

The principal investigator is held responsible for the location as well as the maintenance of equipment. Some agencies may require an equipment inventory report be submitted with the final report. OSP will always require an equipment inventory report be submitted to the OSP Compliance Officer for review and filing at the end of the project period.

Technical/Progress Reports

Technical/Progress reports are required to document the grant recipient's accomplishments, outcomes and compliance with the terms of the award. In most reports, recipients describe scientific progress, identify significant changes, report on personnel, and describe plans for the subsequent budget period or year.

Progress reports required by a grant agency are the responsibility of the PI/PD and should be submitted per the funding agency deadline. Deadlines for progress reports can range from quarterly reports to semi-annual or annual reports. Information on the frequency and level of detail on the status of the project is contained in the terms and conditions section of the Notice of Award.

Most agencies require reports be submitted on-line through the agency portal in an agency specific format (e.g., National Institution of Health (NIH) require a Research Performance Progress Report (RPPR). Should problems arise when submitting your report on-line, it is suggested that you contact the agency's HELP DESK for assistance. **When submitting your technical/progress report to the agency, a copy must be forwarded to the OSP Compliance Officer.**

NOTE: Most awards are paid on a cost-reimbursement basis. This means the University advances money to the project and then invoices the sponsor for payment. Until payment is received, the University carries the debt for costs already incurred. Failure to receive required technical reports is frequently the reason given by sponsors for not paying invoices in a timely fashion. Delinquent reports can also delay funds for the next budget period for multi-year awards, thus affecting the project and staff salaries.

Requesting Financial Reports

Although the PI/PD does not prepare and submit the financial report, it is the PIs/PDs responsibility to work with their Financial Administrator to assure timely submission of the financial report(s). To stay abreast of the project's financial status, PIs/PDs can make requests periodically to their Financial Administrator for the project's budget report, which includes the expenditure accounts for your grant.

The PI/PD should compare and reconcile the RFA budget report with

their own records on project expenditures. If the PIs/PD's budget records disagree with those of the Office of Restricted Funds Accounting, the principal investigator is obligated to contact the Financial Administrator to resolve the differences. Requesting the budget reports on a periodic basis is effective in communicating timely information on the financial status of awards.

Effort Reporting

Typically, in most project budgets, two thirds of the direct cost consist of personnel services. Under the revised Uniform Guidance (2 CFR 200), the federal government requires that strong internal controls be in place for reporting salaries and wages to ensure that payroll charged to various grants/contracts match the actual time spent working on the project. **All faculty who serve as principal investigators and program directors** on **sponsored agreements are** personally responsible **to certify the amount of effort that they and their employees spent on sponsored activities.**

Commonly Effort (T&E) Reporting, it is the proportion of time spent on professional activities such as **research, teaching, administration, and service** for which an individual is employed by DSU or for which one is appointed as a DSU faculty member. Effort reporting is the method of certifying to the granting agency that the effort required, as a condition of the award, has actually been completed. The OMB Uniform Guidance requires certification of effort spent by all employees whose salaries (in whole or in part) are charged directly to federal and federal flow-through funds. The OMB Guidance also requires certification on committed cost share/matching. Any salaries and wages within a cost share/match budget must provide documentation for effort reporting.

Government sponsors expect to pay only for those portions of employee effort that are actually devoted to their projects. Periodically, government and internal auditors review payroll charges to enforce this expectation.

DSU uses the **"After-the-Fact Activity Record"** method for reporting time and effort on sponsored projects. This method determines that the total amount of effort must equal **(100%)** for all duties (sponsored activities/release time; university/academic teaching and; all other university activities) of faculty and staff paid a salary and wage from an award. **Faculty and staff** are monitored by semester. **Hourly and Part-time staff** are monitored on a monthly basis.

PIs/PDs and Professional Staff

The Office of Sponsored Programs has developed a Time and Effort Reporting System whereby the **PIs/PDs and Professional Staff** complete a T & E Form three times a year.

January 1st – May 31st (T&E is due June 30th)
June 1st – August 31st (T&E is due September 30th)
September 1st – December 31st (T&E is due January 30th)

PIs/PDs and professional full time faculty/staff are required to provide percentages for each of their duties/responsibilities (i.e. Research 25%, Non sponsored activities 75%).

1. At the end of each certifying period an email will be sent to the PI/PD containing an Excel spreadsheet (with each person paid on that project for the period), and blank effort reporting forms.

20xx _____ Time and Effort
_____ 1, 20xx –_____31, 20xx

ATTENTION NEW PROCESS PLEASE READ!!!!

Time and Effort (T&E) for the 20xx _____Semester is due on _____ 30, 20xx. See attached T & E excel spread sheet and a new effort reporting form for faculty/professional staff and hourly/part-time staff. No old effort certification forms will be accepted.

What has changed?
- The new effort certification forms are now Excel documents. Save the document on your computers, fill in the applicable fields, print the form, and obtain required signatures.
- All completed forms can be sent via campus mail, dropped off in the OSCAR building 3rd floor, or scanned and emailed to Effortreports@desu.edu

Faculty/Professional Certification Form
- Drop down box for the certifying period, employee status.
- Effort percentage will automatically total. If the total of all effort (sponsored and non-sponsored) does not equal 100%, the cell will remain red. *Note: The form cannot be submitted unless the cell is green and the total equals 100%*
- Check boxes for funding type (funded, in-kind, cash matched).
- The Other University Activities sections have been combined into one Non-Sponsored Activity field.
- You may obtain the signature of either your department chairperson **or** college dean (if your college's signature process differs, please follow it.).

Below is an example of how the form should be completed.

Employee Name:	John Q. Investigator	Department:		Chemistry	
Certification Period *(choose from the drop down):*		FA 2017	Employee ID:		
Employment Status *(choose from the drop down):*				Faculty	

Sponsored Activity:					
Project Title		*Funding Type*	*Budget#*		*Effort %*
Sponsored Activity 1		☑ Funded ☐ Match ☐ Stipend	6000		25
Sponsored Activity 2		☑ Funded ☐ Match ☐ Stipend	6000-1		10
Sponsored Activity 3		☐ Funded ☑ Match ☐ Stipend	6000-2		15
		☐ Funded ☐ Match ☐ Stipend			
		☐ Funded ☐ Match ☐ Stipend			
Total Sponsored Activity					50
Non-Sponsored Activity:					Effort %
Other Delaware State University Functions- All other responsibilities (i.e. Administrative time, teaching, advising, mentoring, etc.)					50
Total Effort Distribution		*EFFORT MUST TOTAL 100%*			100

Monthly Certification Form
- This form is utilized for all employees who complete bi-weekly timesheets through the Webtime portal (self-service) and any employees receiving pay for after-hours.
- Attach a copy of the approved timesheet from Webtime for the certifying month to the monthly effort certification form. If you do not have access to the self-service Webtime you will need to complete the effort certification timesheet and attach it to the monthly effort form for that certifying month.

Please note the following:
- Time and Effort is **_after-the-fact_** reporting, therefore you are certifying work that has already been completed. If you have worked on any sponsored grant/activity/program you must complete an effort report.
- Faculty/professional employees should calculate percentage of time worked on the project(s) over the entire certification period.
- Make sure that you have obtained all required signatures before sending the form to Sponsored Programs. *Note: Please remember this must be done after the certifying period has concluded.*
- Any missing T & E forms prior to the 2017 Fall Semester need to be submitted to Sponsored Programs immediately (highlighted in yellow on attached spreadsheet). Failure to comply may result in the suspension of expenditure approvals.

As the PI of a project you are responsible for ensuring everyone working on your project completes their time and effort form.

Please contact me if you have any questions, need any corrections to the Excel Spreadsheet or the attached T & E forms.

Thank you
Lynette K. Lee, Compliance Officer   effortreports@desu.edu   Ext. 6812

2. The PI/PD will verify the accuracy of the spreadsheet information. If there are any inconsistencies the PI will notify the compliance officer.

3. The employees will complete the effort report for their job classs and submit to the PI/PD for approval. The PI/PD will submit to the department chair or college dean for approval. (Please follow the colleges signature process).

4. The signed form should be forwarded to OSP- Attn: Compliance Officer or email effortreports@desu.edu for final certification and signature.

If the agency requireds the effort commitment in your proposal be listed in months and now you are required to complete your T&E form in percentage of time, there is a **Helpful tool available:** NIH has a link Usage of Person Months on its website which contains a worksheet that can assist you with the conversion.

Part-time/Hourly staff

Part-time staff complete a Monthly T & E Form. Part-time staff can attach approved timesheets to the montly certification form. Once completed and signed by the employee and PI/PD the form should be forwarded to OSP – Attn: Compliance Officer for final signature emailed effortreports@desu.edu for final certification and signature.

NOTE: The PI/PD must notify the Office of Sponsored Programs whenever the percentage of effort changes. If project staff are leaving the University, the PI/PD must notify Human Resources (in writing) preferably 90 days prior to their departure or as soon as the PI/PD is made aware of their departure.

Student Employees

Students are **not** required to complete T & E forms. Should the students working on the project need to have an internal or external review, the student's payroll records will be requested from student payroll. **NOTE:** It is important that the student's immediate supervisor sign their payroll sheets. In the event of an agency site visit or audit, the student's immediate supervisor is the one responsible for discussing and certifying the student's work on the project. **Time and Effort Reports are not required for student stipends and student scholarships.**

Sanctions for noncompliance can be serious, including criminal charges, debarment, and suspension. The Office of Sponsored Programs is responsible for retaining time and effort reports on projects. Contact the OSP Compliance Officer with any questions and/or assistance with time & effort.

Change of PI/PD and Requesting Extended Leave

Requests to change the PI/PD must have the approval of the President or Provost, academic Dean, and the sponsor. A justification for the change must be submitted as part of the request. A curriculum vitae for the proposed new PI/PD, should accompany the request. **NOTE:** There can be no activity on the project until the agency has approved the change in PIs/PDs.

If extended leave is requested by the PI/PD (and in some cases key personnel), prior approval from the awarding agency is normally required for any absence of the PI/PD for a period of 3 months or more or a reduction of effort equal to or exceeding 25%. A substitute PI/PD may be named and approved by the sponsor or the award may be relinquished. In general, changes in key personnel whose expertise is critical to the project must also have prior approval. Agency guidelines can differ and change, it is important to always review agency guidelines as to how each agency states their procedures for a Request to Change PIs/PDs and extended leave.

Transferring an Award

If a PI/PD transfers an award to DSU from another institution, the former institution will need to close out its agreement with the sponsoring agency. The same process must be completed if a DSU PI/PD is transferring to another institution. Most institutions have their own policies and procedures to follow when transferring an award. **OSP must be notified as soon as the possibility of an award transfer exists.**

Many federal agencies have specific guidelines and forms for both the relinquishing institution and the institution to which the award is being transferred. **By no means should any work be started at DSU prior to agency and university approvals of an award being transferred in or out of the University.**

Site Visits

Funding agencies typically use site visits as a mechanism for monitoring awards. The visits are routinely conducted as part of an ongoing compliance initiative. Federal agencies usually schedule site visits for large awards, for projects that are not abiding by the award terms and conditions and for cooperative agreement awards where periodic agency monitoring is part of the award agreement. Federal and state agencies can notify the PI/PD of a site review at any time during the project period or shortly after the close of the project.

The visits can vary from brief meetings to discussing the specifics of the science or program to multi-day reviews by a team of outside experts who will evaluate all aspects of the proposed work and the University environment that is available to support it. If you are notified of a site visit, it is important to promptly contact OSP so that an individual familiar with state and federal guidelines/requirements and the University's policies and procedures can participate in the site visit.

The agency will usually allow ample time to prepare a meeting agenda (if one is not provided by the agency), schedule times for other staff to meet with the agency site visit team and review required documents. **NOTE: Grant management is the key to a successful site visit. PIs/PDs should prepare and have all required documents <u>organized</u> and filed to be in compliance.**

In some cases, in order to save on their travel budgets, some sponsors hold "reverse" site visits where the PI/PD and other key personnel are invited to meet agency representatives at the sponsor's headquarters. If this is an agency requirement, travel expenses from the direct cost budget is an allowable expense.

REGULATORY COMPLIANCE

Conflict of Interest (COI)

Federal regulations, state laws and university policies related to sponsored programs' Conflicts of Interest recognize that faculty may have financial interests in sponsors of their research and/or in entities with business interests closely related to their research. Under DSU's Conflict of Interest Policy, faculty, staff, students and volunteers working on a sponsored project **must** review and complete a <u>Conflict of Interest Policy and Form</u> annually. Completed forms should be sent to the OSP.

The OSP maintains records of all confidential Conflicts of Interest (COI) disclosures pertaining to sponsored projects and provides reports of such to the University General Counsel and federal regulators as required. If you have any questions related the to the University's COI policy or the form, contact the OSP for assistance.

Responsible Conduct in Research (RCR)

Delaware State University has an obligation to ensure that all students, faculty and staff conducting research do so by applying the highest ethical standards. Education and training in the ethical and responsible conduct of research is a training requirement for individuals pursuing degrees or engaging

in research in any field.

During the past few years, agencies have become more likely to require that everyone conducting research receive training in the responsible conduct of research in core areas that are seen as significant in conducting research. DSU has invested in an on-line Responsible Conduct in Research (RCR) training module, Collaborative Institutional Training Initiative (CITI), that can be found on the DSU Forms Library.

The CITI training materials encourage investigators, staff and students to think critically about the research in which they are involved and to engage in discussions about what it means to be an ethical researcher. Conducting research ethically requires an understanding and appreciation of the ethical imperatives behind the rules.

PIs/PDs are responsible for assuring that all faculty, staff and students involved in the sponsored project complete the CITI training. CITI will provide each participant with a Certification of Completion at the end of the training. Participants should retain a copy of the certificate for their own project files and forward a copy to their Dean (or designee) and the Office of Sponsored Programs. For questions and assistance with CITI, contact OSP.

Institutional Review Board

Research conducted by DSU affiliates using human participants is overseen by the Delaware State University's Institutional Review Board (IRB). The IRB is a committee established to review research involving human subjects. A human subject is a living individual about whom an investigator (whether professional or student) conducting research obtains:

- **Data collected through intervention or interaction with the individual, or**

- **Identifiable private information.**

IRB's use a group peer review process to review research protocols and related materials (e.g., informed consent documents, surveys, interview questions, and protocol design) to ensure protection of the rights and welfare of human subjects participating in research. Its main commitment is to facilitate human subjects research and to ensure that their rights and welfare of human subjects are protected during their participation.

While respecting the right of faculty to academic freedom in research; the University is firmly committed to adhering to the basic ethical principles underlying the acceptable conduct of research involving human subjects. **All projects involving human subjects research must receive approval from the IRB.** The University IRB Policy as well as all required forms/documents

can be found on the OSP Forms Library. Research projects of certain types may qualify for an IRB exemption. A listing of possible IRB exemptions can be found on the IRB Exemption Application. **The IRB application must be submitted and approved prior to any human subject participation on a project.**

NOTE: For multi-year awards that involve human subjects, IRB reports are required at the end of each budget period in the form of a Continuation IRB Report. The report may be submitted to OSP at the same time as the annual technical/progress project report is due. At the end of the project period the IRB Final Study Report will be due and must be submitted to OSP. Any questions on human subject research should be directed to the Research Administration/Integrity Officer in OSP.

Institutional Animal Care and Use Committee

The **Institutional Animal Care and Use Committee (IACUC)** is a federally mandated committee, qualified through the experience and expertise of its members. The DSU IACUC oversees its institution's animal program, facilities, and procedures. It works with PIs/PDs to provide a framework for compliance with federal policies, guidelines and principles related to the use of animals in research, teaching and testing.

The IACUC ensures compliance with all federal, state and DSU regulations and policies. Standards are in place to protect animal welfare. IACUC members review all requests for approval to use vertebrate animals. It also conducts inspections of all areas where animals are housed and used, reviews the institutional program for animal use and submits required annual reports to the appropriate Federal Regulatory Agencies.

Approval by the IACUC must be obtained before an animal research project can be conducted at the University. The IACUC Application can be found on the OSP Forms Library. Any questions on animal research should be directed to the Research Administration/Integrity Officer in OSP.

Research Misconduct

Researchers are expected to adhere to ethical, legal, and professional guidelines that structure how research is conducted. The consequences that research misconduct can have are considerable and potentially disastrous. Research misconduct can erode trust among colleagues, collaborators, researchers and funding agencies, which may make it more difficult for colleagues at the same institution to receive future awards. Secondly, it can cause the public to lose trust in research.

Faculty and staff at Delaware State University are expected to adhere to the highest standards of professional conduct in carrying out their teaching, research and service responsibilities.

As an institution devoted to the creation and dissemination of new knowledge through research and scholarship, DSU is committed to maintaining the truthfulness and integrity fundamental to these activities through the responsible and ethical conduct of its faculty, academic professionals, staff and students. You can review the University's policy on Allegations of Research Misconduct on DSU's policies and procedures website.

Export Controls

The U.S. government has been involved in regulating the transfer of information, commodities, technology, and software since the 1940's. However, in recent years, attention to compliance with export control regulations has increased because of heightened concerns about homeland security, the proliferation of weapons of mass destruction, terrorism, drug trafficking, and leaks of U.S. technology to economic competitors.

There is a complicated network of federal agencies and inter-related regulations that govern exports collectively referred to as "Export Controls". Export Controls regulate the shipment or transfer, by whatever means, of controlled items, software, technology, data or services out of the U.S. (termed an "Export").
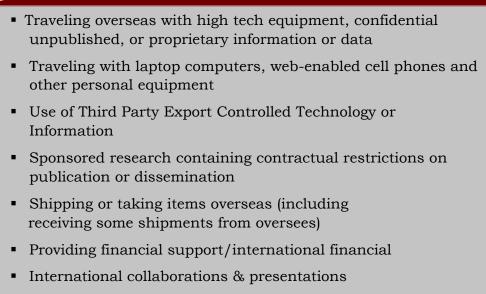
The government also restricts the release of certain information to foreign nationals here in the U.S. (referred to as a "Deemed Export"). Export Controls have the potential (if not treated properly) to severely limit the research opportunities of university faculty and their students and staff, as well as to prevent international collaboration in certain research areas.

In order to ensure compliance with export controls, it is critically important for university personnel to identify when their activities may trigger export controls. When export controls apply, individuals must take the appropriate steps to obtain any required governmental licenses, monitor and control access to restricted information, and safeguard all controlled materials.

Non-compliance with export controls can result in severe monetary and criminal penalties against both an individual as well as the University. It can also result in the loss of research contracts, governmental funding, and the ability to export items. It is thus critical for DSU researchers to understand their obligations under these regulations and to work with the OSP to ensure that the University is in compliance with these laws. **If you have research that may involve export controls, contact the OSP to discuss the procedures to follow before any travel and research material/data is sent in or out of the country.**

Some of the areas that may come under export control are:

- Traveling overseas with high tech equipment, confidential unpublished, or proprietary information or data

- Traveling with laptop computers, web-enabled cell phones and other personal equipment

- Use of Third Party Export Controlled Technology or Information

- Sponsored research containing contractual restrictions on publication or dissemination

- Shipping or taking items overseas (including receiving some shipments from oversees)

- Providing financial support/international financial

- International collaborations & presentations

- International field work

- International consulting.

Materials Transfer

A Material Transfer Agreement (MTA) is a contract that governs the transfer of tangible research materials between two organizations, when the recipient intends to use it for his or her own research purposes. The MTA defines the rights of the provider and the recipient with respect to the materials and any derivatives. Biological materials, are the most frequently transferred materials. However, MTAs may also be used for other types of materials, such as chemical compounds and even some types of software and data.

DSU has established a Materials Transfer Agreement Process to assist PIs/PDs with requesting a DSU Materials Transfer Agreement.

Along with the request to transfer materials, it is suggested that PIs/PDs complete and submit to OSP a MTA Questionnaire. The questionnaire has specific questions to assist OSP staff, DSU General Counsel and any other DSU offices that may need to review and approve the MTA. The questionnaire provides an understanding to exactly what is being transferred to or from an outside organization to DSU, what the material will be used for and any potential risk associated with the material. The MTA Questionnaire (Incoming) and the MTA Questionnaire (Outgoing) can assists with expediting the MTA process by alleviating ongoing questions between the PI/PD and the offices that

need to approve the request. **If an MTA is required, the faculty member must be sure that it is in place prior to receiving or sending the material.**

Patents/Copyrights

Research is an integral part of higher education and is essential to effective teaching at the University level. Delaware State University encourages its faculty members to undertake research and assumes the responsibility of promoting a research program.

The University's General Counsel is designated as the agent for the review and approval of intellectual property for DSU faculty and staff, while the office of the Associate Vice-President for Research is responsible for managing the invention disclosure process. Faculty and staff interested in filing should submit an Invention Disclosure Form and submit to the Associate Vice-President for Research.

Once the University's General Counsel approves of filing of a patent, he will contact OSP for submission of the proposed patent/copyright information through the iEdison portal (if applicable). Federal regulations with the enactment of the Bayh-Dole Act of 1980, stipulated the need for all grantees or contractors to report on activities involving the disposition of certain intellectual property rights that result from federally funded research (37CFR Part 401).

Under the Act, the idea behind Edison was first deployed in 1995 for the benefit of the NIH in 1997, NSF and USAID were added and Interagency Edison (iEdison) was introduced. Through iEdison, a single user can interface inventions supported by any of these three agencies and report electronically. The data is partitioned within the single iEdison database so that each agency can oversee their invention reports. For additional information on iEdison go to Q & A on iEdison.

Research Safety

At Delaware State University, the safety of all living beings is of utmost concern to our institution. For this reason, all research conducted must comply with all guidelines and requirements for ensuring the safety of our faculty, staff, students, researchers, and the public at large. DSU has several policies and plans that guide and protect, faculty, staff, students and the research community while engaged in sponsored projects. The links below will provide more information.

Hazardous Waste Disposal

Hazardous Materials Handling and Storage

Chemical Waste Disposal Form

Laboratories Close-out

Laser Safety Plan

Safety Shower and Eye Wash Plan

Audits

The cognizant federal agency for Delaware State University is the Department of Health and Human Services. The cognizant agency is responsible for negotiating indirect cost rates, ensuring that audits are received and that reports are made in a timely fashion in accordance with the relevant agency and OMB Uniform Administrative Requirements. The cognizant agency can provide technical advice, make quality control reviews of selected audits, coordinate audit reviews and oversee the resolution of audit findings.

The University is required to have an annual (A-133 single audit) by an independent accounting firm. The examinations are intended to ascertain the effectiveness of the financial management systems and internal control procedures that have been established to meet the terms and conditions of the grant agreements. Fiscal integrity of financial transactions are tested, as well as compliance with the terms and conditions of federal, state and other entities. Delaware State University is subject to OMB Uniform Guidance single audit requirements as a State university.

AWARD CLOSE-OUT

In essence, you must go back to the beginning of your project in order to get to the end. Information regarding project closeout requirements are detailed in the award terms and conditions which were first reviewed during the Post Award Meeting. The PI/PD has the responsibility for the technical and fiscal management of their sponsored project, and ultimately the orderly project closeout. PIs/PD's should work closely with the OSP Compliance Officer and their RFA Financial Administrator during the last several months of the project to ensure an orderly close out. For many agencies, the normal close-out period is 90 days after the project ends, except for federal pass-through and state projects which can vary from 30 to 60 days. Review your terms and conditions to verify the close-out period for your award.

During the last 3-6 months of the project, the OSP and RFA will work with the (PI/PD) to ensure that all conditions for award compliance have been met. To initiate the close-out process, the OSP Compliance Officer sends a close-out memo to the PI/PD ninety (90) days prior to the project end date. The memo will ask the PI/PD to schedule a close-out meeting (a minimum of 30 days prior to the project end date). The memo will list several items the PI/PD is reminded to review in preparing for a successful close-out per the project award terms and conditions. As part of the close-out process, below are items addressed in the memo that will require review:

- Reminder of the project end date and will the PI/PD require a no-cost extension
- Due date for the final technical/progress report as well as any other final required reports (e.g., financial reports, outcome reports, evaluations, equipment inventory reports, patent/inventory, etc.)
- Confirm time and effort reporting is up-to-date
- Contacting human resources – should any project   staff be leaving DSU
- Scheduling a meeting with Restricted Funds Accounting sixty (60) days prior to the project end date, to assure expenditures are aligned with preparing for close-out
- Within the last 30 days, what expenditures are allowed

CLOSE-OUT MEETING

The attendees at the close-out Meeting will include the PI/PD (and any key personnel the PI/PD wishes to attend), OSP Compliance Officer, other OSP staff if deemed necessary, the RFA Financial Administrator and any other pertinent university staff needed to successfully close-out the project. During the meeting, the OSP Compliance Officer will use a <u>Close-out Meeting Checklist</u> to discuss areas that need to be reviewed prior to the end of the project period. The items on the close-out Checklist are as follows:

- ➢ Status of the project's time and effort
- ➢ Equipment Inventory Spread Sheet (if applicable)
- ➢ Supplies Documentation (ensuring requisitions are in order)
- ➢ Office Space (if applicable)
- ➢ Financial Reports (RFA Financial Administrator)
- ➢ DSU sub-awards (if applicable)
- ➢ Human Resource Office (employee clearance)
- ➢ IRB Final Report (if applicable)
- ➢ IACUC

➢ Patents/Intellectual Property
➢ Final Technical Reports (reminder of the agency due date)
➢ Document Retention
➢ Any additional agency special requirements

The Compliance Officer will also discuss any reports that are past due or are not currently on file with OSP. During this meeting, the PI/PD has the opportunity to ask for assistance and/or guidance with any aspect of administrative management needed for a successful close-out.

The Financial Administrator will discuss the status of the project expenditures and the final financial report. Timely submission of closeout documents must be done to alleviate the possibility of suspended or denied final payments from sponsoring agencies.

At the conclusion of the meeting, all participants will sign the Close-out Meeting Checklist, a copy of the checklist will be given to the PI/PD, the Financial Administrator and the original will be filed in the OSP. The PI/PD can request assistance from OSP and RFA at any time during this close-out process.

Once the project period has ended, the PI/PD is responsible for submitting the final technical/progress report to the agency on or before the agency due date, along with any other required final administrative reports according to the terms and conditions. A copy of said reports should be sent to the OSP Compliance Officer for filing. The PI/PD must assure that Time and Effort (T&E) forms for all staff project personnel have been submitted to the Compliance Officer.

Although, the PI/PD does not prepare and submit the final financial report and/or final invoice, it is your responsibility to monitor and work with your Financial Administrator as they are finalizing expenditures. Monitoring the status and documenting the date the final financial report/invoice is submitted to the agency is important to the actual close-out of your award.

Award Retention

The OMB Uniform Guidance Subpart D 200.333 outlines the Federal Government's record retention policies for sponsored research awards. "Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report, or for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the federal awarding agency."

Due to the variety and range of records generated during the sponsored award life cycle, records retention at DSU is a shared responsibility across (PIs/PDs), the Office of Sponsored Programs and the Office of Restricted Funds Accounting.

Federal regulations require the University maintain for audit purposes and agency review all project-related records, both financial and technical (including lab notes, equipment inventories, and all institutional committee approvals such as human subject, animal care, etc.) for a **minimum of three years**, unless otherwise specified in the terms and conditions. Compliance with award retention must be a team effort with the PI/PD, OSP and RFA working together since no one individual and/or office retains all of the required documents. In the event of an audit or agency review, all three would need to be prepared to discuss and present documentation.

At the end of the federal retention date, if there have been no agency or audit issues with the project, the award file can be destroyed. However, should there be agency questions on any discrepancies or an audit finding, then the new retention date will be three years (or the time specified by the agency) from the date all issues with the project are resolved.

As stated in the Preface, this Principal Investigator/Program Director Handbook will continue to evolve as federal, state and university regulations and policies and procedures need to be updated. We hope this document has been useful in your research endeavors here at Delaware State University.

All subrecepient invoices must be sent to grantinvoices@desu.edu mailbox by the vendor. If by chance, original invoices are received by the PI/PD, they must be forwarded to the designated mailbox for review and approval. Please visit OSP's Forms Library under DSU Research for the "[DSU Subreceipient Invoicing Process](#)".

CONTACT LIST

The following offices are available and offer their assistance:

Office of Sponsored Programs

Main Office   Ext. 6810

Restricted Funds Accounting

Finance and Administration   Ext. 6200

Purchasing Office

Purchasing Manager   Ext. 7931

Purchasing Coordinator   Ext. 7931

Human Resources   Ext. 6261

Office of Vice-President for Research   Ext. 6656

Risk Management   Ext. 7826