# Tuskegee University Division of Research and Sponsored Programs

## **Guide to Research and Sponsored Programs**



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Approved by:	
	President
	Vice President, Research and Sponsored Programs

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#### PRINCIPLES REGARDING RESEARCH AND SPONSORED PROGRAMS

The following principles guide the conduct of externally sponsored programs at Tuskegee University:

- **A.** The principal investigator is critical to carrying out externally sponsored programs. The awards are made, however, Tuskegee University which bears ultimate responsibility for all sponsored programs and is legally responsible for those activities.
- **B.** The authorizing signature(s) on a proposal represents Tuskegee University's agreement to proceed with the project, if funded.
- **C.** The principle of freedom of research establishes the right of the scholar to determine the subject matter and conclusions of his/her research. It protects him/her from imposition on the works, goals and criteria other than professional ones.
- **D.** Any agreement between Tuskegee University and an external sponsor must have some form of sanction in advance. The purpose of this sanction is to insure that the project conforms to administrative and fiscal policies of Tuskegee University and does not conflict with the rights of other scholars or with other institutional commitments.
- **E.** The source of sponsorship and the purpose of the project must be of such a nature that they can be publicly disclosed. Any exception to this principle must be in the best interest of Tuskegee University and in adherence to the requirement of the sponsor and any applicable laws and regulations.
- **F.** All projects are undertaken with the clear understanding that the investigator concerned has a full right to publish any results subject only to establish safeguards for the protection of privacy or confidentiality of personal data.
- **G.** Any results obtained, papers published or lectures given by investigators on externally sponsored projects are the sole responsibility of the investigator concerned.
- **H.** All projects involving living animals and humans, or hazardous or potentially hazardously substances, must follow the safeguards established by Tuskegee University, the funding agency and any applicable laws and regulations.

#### PRE-AWARD ADMINISTRATION

Pre-award administration encompasses preliminary review and approval of projects with potential for external sponsorship, funding source identification, cost sharing analysis, compliance review, proposal processing and approval. Compliance review, which is also a pre-award process, is coordinated by the Office of Grantsmanship and Compliance (OGC)

#### **Proposal Submission Policies and Procedures**

This section is designed to facilitate the submission of sponsored project proposals by informing principal investigators of university policies and procedures governing this activity. The Office of Sponsored Programs (OSP) is the office charged with assisting Tuskegee University faculty and staff in the pursuit of extramural funding of projects of benefit to the Tuskegee community primarily through competitively awarded federal grants. The OSP assist the principal investigator during the planning phase of proposal preparation by reviewing sponsor guidelines, identifying any special sponsor requirements, including necessary forms, authorizations and assurances, and any budget provisions needed to be in compliance with the sponsor's and the University's requirements.

#### University Policy on Submission of Proposals for Institutional Support

Any official application or University proposal to a source outside the University for financial support of projects to be conducted under University auspices, including requests for additional time and/or money after an award has been made, must be submitted through the Office of Sponsored Programs. This includes both assistance and procurement type proposals.

#### Who May Serve as a Principal Investigator?

Any Tuskegee University non-temporary, salaried, general faculty employee may serve as a principal investigator. Individuals with other types of appointments must be approved by the department and college, and then should be listed as the <u>co-principal investigator</u> with a non-temporary, salaried employee serving as the prime principal investigator. Graduate research students and post-doctorals are considered temporary, non-faculty appointments. Graduate students and postdoctoral research associates do not need approval to apply for fellowships. However, a faculty member or other individual authorized to supervise graduate students must fulfill the appropriate advising responsibilities and be designated as the PI in internal records.

#### **Notice of Intent to Submit a Proposal**

Principal Investigators are responsible for notifying OSP in advance, through the use of the Internal Proposal Routing Form (IPRF) available on the Sponsored Programs web page (<a href="http://www.tuskegee.edu/research/formsapplication.aspx">http://www.tuskegee.edu/research/formsapplication.aspx</a>), when they intend to submit a proposal. See appendix X for instructions. This advance notice enables OSP to verify that the most current proposal solicitation and agency forms are being used and allows the appropriate Grants Specialist to fully review proposal guidelines and work with the PI during proposal preparation and submission.

#### **Identification of Funding Opportunities**

You may log onto the Tuskegee University's Research website and click on the *Funding Opportunity* icon. You will have access to information on funding opportunities offered by various federal agencies and private foundations. The OGC also sends, through email, Broad Agency Announcements (BAA) and Request for Proposals (RFPs) to all faculty members regularly.

#### **Preliminary Review and Approval**

The purpose of the preliminary review and approval process is for the University to decide whether or not the PI should be allowed to proceed with the development of the proposal. *Preliminary review* 

and approval phase is applicable to all solicited and unsolicited proposals for submission to a federal agency, a foundation or an industry.

#### **OSP Grants and Proposals System (GAPs)**

The Grants and Proposals System (GAPs) is OSP electronic database for grants and proposal applications. It's the electronic life of a grant application – from the notice of intent phase to closeout. Before OSP begin processing documents, a unique tracking number is assigned to identify the proposal/application. This OSP number is included on all internal documents. To ensure that our numbers are not confused with the funding agency's grant, proposal or project numbers, "TU No." is used as the reference.

As an example:

SUBJECT: USDA Project no. 0245696

TU No. DOE/SAH2191031401

The above example immediately tells us that Dr. Doe's file should be located under SAH, Agricultural Science department and was received in OSP in March 2014. The initial proposal file is created and data (project summary/abstract, budget, performance period, etc.) is entered into OSP GAPS. OSP utilizes a checklist and items are checked off as they are reviewed. See Appendix A.

The process is as follows:

- 1. The PI submits the following documents to the OSP:
  - The Internal Proposal Routing Form (IPRF) signed by all parties
  - One Page abstract or program summary
  - Budget
  - A copy of the funding announcement and instructions, if requested.
- 2. The OSP assigns a tracking number to the documents. The tracking number will be used as a reference on all communication regarding the proposal.
- 3. The OSP staff reviews the documents, and either approves the request or forwards it to the Vice President for Research and Sponsored Programs or the Vice President for University Advancement/Development for additional review and approval.

All proposals or requests for submission to an industry or a private foundation must be approved by the Vice President for University Advancement and bear his/her signature.

#### **FUNDING AGENCY RESTRICTIONS (Limited Submission Proposals)**

#### **Policy**

This policy has been established to prevent any potential disqualification of submissions from Tuskegee University. For funding opportunities in which only a limited number of proposal submissions is allowed, an additional pre-submission process will be led by the Vice President for Research and Sponsored Programs, in collaboration with the Director, OSP, to ensure that only the requisite number of proposals are submitted. In some cases, a review process will be conducted by a <u>faculty-led committee</u> to determine the proposal(s) deemed most appropriate to represent the University. This process requires potential Principal Investigators/Project Directors (PI/PD) to submit formal requests in a timely manner to ensure that each applicant receives the proper consideration. *Faculty members should not begin preparation of a proposal in response to a limited submission program until notified by the Office of Sponsored Programs*.

#### **Procedures**

#### 1. Submitting a Letter of Intent

Anyone wishing to submit a proposal for one of these programs should send a brief e-mail of intent to the Office of Sponsored Programs with the subject line: Limited Submission Announcement (PROGRAM NAME FROM ANNOUNCEMENT). To expedite the process of planning an internal review, please send this e-mail as soon as you know you have an interest in the funding program.

The e-mail of intent needs to include only the name of the program to which you intend to apply, the name of the Principal Investigator, any co-PIs, and the subject or title of the proposed project. The deadline for the internal e-mail of intent is three (3) weeks after the publication date of the program announcement, time permitting. If you miss this deadline, please contact OSP to determine the status of the particular program.

#### 2. Notification of Internal Competition

Interested individuals will be notified on the day following the e-mail of intent deadline about the need for an internal competition to select the allowed number of applications to be sent forward to the funding agency. If the number of interested individuals does not exceed the number of allowable submissions, no internal competition will be necessary. If there are more potential applicants than the agency's limit allows, an internal competition will be held to select the proposal(s) that will go forward.

In the event of an internal competition, a brief pre-proposal will be required. Detailed instructions for preparing the pre-proposal will be sent to those who have submitted an e-mail of intent once the need for an internal competition has been established. Failure to follow these instructions will result in automatic disqualification of the submission.

#### 3. Review and Selection

Based on the expertise required for the individual program, the Vice President for Research and Sponsored Programs will determine:

- a) Whether it is more appropriate to ask the Dean of the College or School to determine selections, if more Internal Proposal Routing Forms (IPRFs) are received from that College or School; or
- b) If more than one College or School is involved, the Vice President for Research and Sponsored Programs will seek the solution in consultation with the Provost and the college deans to determine whether there are possibilities of collaboration among potential PIs or suggest other actions that would reduce the number of potential proposals; or
- c) Whether a faculty-led review committee should be convened to review the potential applications and recommend selections.

The Vice President for Research and Sponsored Programs shall decide which, if any, of the above processes will be implemented for all limited submission solicitations. The Provost reserves the right to make the final decision on any limited submission.

#### 4. Selection and Notification

Following selection determination, an e-mail will be sent to all those that indicated an interest. The e-mail will specify the final decision for that individual's proposal. Detailed review results and names or topics of other potential applicants will not be released.

#### 5. After the Selection

The selected PI(s) must adhere to the Sponsored Programs proposal submission policy which specifies that all proposals must be submitted to the OSP *three working days prior to the submission deadline*. The PI is responsible for obtaining all cost-share commitments, if applicable. OSP will notify the dean(s) if a selected PI/PD fails to submit a proposal to the program in question.

#### PROPOSAL/COMPLIANCE REVIEW AND APPROVAL

The PI must submit the full proposal and the budget along with the following forms properly completed to the OSP. It takes at least two weeks for completion of all reviews and approvals.

Indirect Cost Adjustment Form (ICAF), if applicable Cost Sharing and Matching Sources (CSMS), if applicable

#### **COMPLIANCE REVIEWS**

The Office of Grantsmanship and Compliance (OGC) is responsible for the administrative coordination of compliance reviews through committees and the Institutional Review Board (IRB). The following committees and the Institutional Review Board (IRB) are involved in the review process.

Institutional Animal Care and Use Committee (IACUC): All activities involving animals must be conducted in accordance with humane and ethical principles established through federal laws, regulations, and guidelines. Tuskegee University currently has an Animal Welfare Assurance Number on file from the Office of Laboratory Animal Welfare (OLAW), and therefore, follows the Public Health Service (PHS) Policy on the Humane Care and Use of Laboratory Animals. The Animal Welfare assurance is renewed every 4 years. The IACUC is the primary authority on campus for all matters related to animal care and use. The IACUC requires the Attending Veterinarian, who serves as a member on the committee, to enforce policies established by the committee for animal care and use. Details on the Institutional Animal Care and Use Policy can be found on Tuskegee University Research webpage.

**Biosafety Committee (BC):** The Biosafety Committee is charged with the responsibility of ensuring that all activities within Tuskegee University involving potentially bio hazardous materials are conducted in a safe manner and in conformity with federal mandated standards.

Biohazardous material includes infectious biological agents, toxins (carcinogens, mutagens, and tetragons, and other hazardous chemical), animal or human tissue or fluids, radioactive materials, and recombinant DNA. Infectious biological agents are viruses, bacteria, fungi, parasites and other organisms/genetic systems that, by virtue of their replication properties, are potentially harmful to humans and/or other living systems. Details on the Biosafety Policy can be found on the Research webpage.

Human Participants Review Committee (Institutional Review Board, IRB) is committed to providing a safe and healthy work and study environment for faculty, staff and students. Tuskegee University currently has a Federal Wide Assurance number on file from the U.S. Department of Health and Human Services (DHHS), for the protection of Human Subjects. The Federal Wide Assurance with Office for Human Research and Protection (OHRP) is renewed every 5 years and the registration of the Institutional Review Board is renewed every 3 years. Tuskegee University policy requires institutional review and approval of all activities that involve the use of human participants. Details on the Human Participants (IRB) Policy can be found on the Research webpage.

Radiation Safety Committee (RSC) is licensed by the State of Alabama to possess and utilize radioactive materials and devices that produce ionizing radiation. The license by the State is renewed every 5 years. Federal and state laws require that standards, policies and procedures that are set forth in Rules of Radiation

Control of the Alabama State Board of Health, Chapter 420-3-26, are enforced by persons (Institutions) holding such licenses. The primary purpose of the RSC is to ensure that radioisotopes and devices producing ionizing radiation are used safely and that they present no danger to either the campus community or to persons living in communities around the campus. Details on the Radiation Safety Policy can be found on the Research webpage.

The principal investigator is responsible for providing the OGC with the hard copy with all signatures and electronic copy of the proposal, by the date established for reviews. Proposals requiring compliance approval should be developed well in advance of the deadline to insure adequate time for processing and approval.

#### Time and Effort

An important aspect of the proposal review process is the analysis of the time and effort necessary to fulfill the objectives of the proposed program. As part of the review process, the OSP is required to take into consideration the amount of individual effort in proposed, pending and current programs, institutional requirements related to teaching loads, release time and faculty research, as identified in the Tuskegee University Faculty Handbook, and funding agency and government requirements. Tuskegee University is required by the Office of Management and Budget Circular A-21 to gather effort-related data. These reports are used to document direct salary charges on, and mandatory cost sharing to, federally sponsored agreements.

#### **Release Time**

Faculty applying for grants who wish to include release time in the grant is required to request the appropriate amount of the faculty member's salary in the proposal. This would permit the hiring of additional faculty member (s) in the department assuring that the normal teaching activities of the department are carried out.

Tuskegee University encourages faculty research and encourages faculty to submit proposals for funding. When proposals are funded, a faculty member may not be paid more than 100 percent of his time claimed by the University, and salary supplements for the duration of a grant shall not be allowed.

#### **Summer Compensation**

If an investigator is to be compensated from a grant for research done during the summer months or other free periods, the compensation shall not exceed the rates approved by the granting agency or rates of the University.

#### **Consultants**

Tuskegee University allows the PIs to engage consultants, as necessary, in the implementation of proposed work. However, no full-time faculty member may serve as a paid consultant for a research grant held by another faculty member of the University.

#### PROPOSAL DEVELOPMENT

An application for a sponsored project award generally takes the form of a proposal. A proposal is an application for funding that includes all information that is necessary to describe the project aims and objectives, staff capabilities, environment, and funding requirements.

There are two types of proposals submitted by PIs in search of funding for sponsored projects:

#### **Solicited Proposals**

Solicitations, or requests for proposals (RFPs), are issued by agencies or private funding sources that make requests for a specific research project. These RFPs are generally subject to open bidding to any qualified researcher. Deadlines are specified in the announcement and must be adhered to. The resulting agreement usually takes the form of a contract between the funding agency and the University.

#### **Unsolicited Proposals**

Unsolicited proposals are submitted to an agency that generally funds research of the type being proposed. If the agency decides to fund the research, the funding may take the form of a grant, contract or cooperative agreement. Most large agencies have set deadlines for submittal of unsolicited proposals each year, and funding decisions are made once all proposals received in that time period have been reviewed. Corporate sector funding is frequently in the form of individual contracts for specific work.

#### **Renewal Applications**

Because of changes that may be substantial in terms of personnel, institutional commitments, or funding agency requirements, renewal applications are processed in the same manner as a new application. Please provide the current grant account number.

#### PROPOSAL PREPARATION

#### A. Proposal Writing

Proposals are written by the PI. OSP provides assistance with obtaining and interpreting agency guidelines, providing all administration data such as rates and assurance dates, and by reviewing the completed proposal.

In general a proposal consists of a narrative or technical section, an administration section or document, and a budget. The narrative or technical section should be a clear and concise explanation of the planned research including specific goals and methodologies.

The budget is the best estimate of support needed to perform the research proposed. It should detail and justify each item of cost.

#### **B.** Deadlines

The funding agency's deadline is an important consideration in preparing a proposal. Every funding agency has its own process and schedule for announcing the availability of funding. Some agencies provide ample lead time (six months to a year in advance) for the preparation and submission of proposals. Others, especially those procuring services via contractual agreements, provide very short notice. Proposal writers are encouraged to give themselves as much time as possible to gain preliminary approvals, develop and organize their projects, write the proposal, and meet institutional and funding agency requirements and deadlines for review, approval and submission.

#### C. Format and Content

Most funding agencies provide instructions on proposal format and content in the funding announcement. These instructions may provide specific information on page limitations, margins, the size of the typeface/font, mailing, etc. In addition, the funding announcement may provide information on how to respond to the review criteria or prepare specific sections of the proposal. The principal investigator and/or proposal writer should review this information to ensure that the final proposal document reflects an understanding of the program needs, requirements and funding criteria.

In cases where these are not provided, the following basic format is suggested:

- 1) Cover page
- 2) Certifications and representations as required by agency
- 3) Abstract containing a brief overview (approximately 250 words) of the proposed research including goals and methods
- 4) Introduction which identifies the problem and the need for the research
- 5) Statement of work which outlines precisely the goals, methodologies, dissemination of information and a description of resources

- 6) Budget estimates for every item of cost and supporting detail
- 7) Listing of current and pending research support
- 8) Appendix, including vitas for key personnel and other pertinent documents or forms

#### D. Budget/Budget Justification

Budgets generally contain itemized direct and F&A costs, other cost requirements, appendices and required forms. Budget estimates should outline all costs for a given project. The following is a general budget format:

- **1. Direct Costs:** Direct costs are the expenses directly associated with a specific research project. The sponsor is expected to provide for all direct costs, which may include:
  - a. Salaries and Wages: List professional personnel to be involved along with a percentage of effort. Next, list staff required and the estimated number of calendar months to be devoted to the project each year. On federally funded projects, administrative salaries are generally unallowable. If they are to be included, it is essential that sufficient justification for clerical and administrative staff be provided. Please remember to escalate salary for subsequent years, as natural rate of inflation can cause a multiyear project to become underfunded in the later years. Up to 4% escalation per year is allowed.
  - b. Fringe Benefits: Varying fringe benefits are associated with different personnel categories. Please contact OSP for current fringe benefit rates.
  - c. Materials and Supplies: These are normally expendable items with a useful life of less than one year. These expenditures can be identified specifically with this particular sponsored project and are required in the direct performance of the research. These expenses include applicable laboratory supplies. It is generally unacceptable to include office supplies.
  - d. Capital Equipment: Identify equipment you are requesting for the project including the model number and price quotes from a reputable source, listing name of source. Capital equipment must be directly related to the proposed research/activity, have a useful life of more than one year, and cost in excess of \$5,000. General purpose equipment, such as desks and computers, is generally not allowed. Consult agency regulations or call OSP for more specific information.
  - e. Travel: List total amount requested with a breakdown of expenses, e.g., according to destination, purpose, number of travelers, number of trips, airfare, hotel, per diem and mileage reimbursement. Describe separate domestic and foreign travel associated with the project. Please read the RFA carefully to ensure that you're included any required travel.
  - f. Consultants: Identify the names of consultants, specialty, daily rate and justification for their use including a letter of support, with a scope of work. TU employees cannot serve as consultants on TU sponsored projects.
  - g. Printing and Publication Costs: Many journals require a per-page or per-article publication cost, and these fees should be paid for through your grant. Other publication costs, including posters for meetings, should be also included. Estimate the number of pages, page charges, and name(s) of journal(s).
  - h. Subcontracts/Subawards: List the names and addresses of all subcontractors/sub-awardees. Obtain a proposal from the subcontractor/subawardee (signed by an authorized official) that includes a statement of work, detailed budget and justification on correct forms, and a copy the organization's rate agreement.
  - i. Alterations and/or Renovations: Itemize the requirements and costs.

- j. Other Direct Costs: Includes direct costs not specifically described by the general headings above such as tuition remission, scholarship, stipends, subsistence, etc.
- 2. Facilities and Administrative Costs (F&A): Facilities and Administrative (F&A) Costs, previously known as indirect costs, are the expenses incurred for general University operations while conducting the research project, such as library services, administrative costs, and building use and maintenance. F&A costs are calculated as a percentage of direct costs and are set by the Federal Government.

The federal government provides rules (OMB Circular A-21) governing the calculation of F&A cost rates and periodically audits the costs supporting the rates we have negotiated. Some items, such as capital equipment and tuition, are excluded from the F&A cost calculation. Known as Modified Total Direct Costs (MTDC), this formula entails deducting the following direct cost items prior to calculating F&A: Equipment exceeding \$5,000 per item; subcontracts in excess of \$25,000; tuition, patient care costs, rental of off-site facilities; capital expenditures; and fellowships and scholarships.

It is the policy of Tuskegee University to charge the maximum federally negotiated F&A rate on all sponsored projects regardless of funding source unless a sponsoring agency's written policy will not allow full or partial recovery of F&A costs. If the funding agency allows reimbursement of F & A, please provide the amount and rate of reimbursement. If the request for proposal (RFP) does not specifically state allowable and/or percentage, this will be verified by the OSP. If the agency does not reimburse F & A in accordance with Tuskegee University's negotiated rate with the Department of Health and Human Services, or where an adjustment of F & A is requested by a Principal Investigator, he/she (the PI) must submit an Indirect Cost Adjustment Form (ICAF) (Appendix) to the OSP. Recognizing that a full budget may not be available at this time, the PI should calculate the adjustment according to the maximum amount of funding allowed for the specific program. The OSP will verify the information on the ICAF prior to submission to the Vice President of Research and Sponsored Programs who will make recommendations to the general officers on adjustment of F & A. Please note: there are different rates for on-campus and off-campus research, teaching and service. Current rates may be obtained from the OSP.

Junior faculty may request an indirect costs reduction waiver. See policy on indirect costs reduction waiver or contact OSP for additional information.

- **3.** Cost Sharing/Matching Funds: If the PI indicates cost sharing in the proposal, the abstract must show how cost sharing/matching will be provided. Cost sharing is defined as any contribution of funds or resources toward the full cost of a sponsored program. Many sponsors view cost sharing as evidence of our commitment to a proposed project. There two forms of cost sharing:
  - **a. Mandatory** Cost sharing is mandatory when a sponsor requires the University to contribute toward a project's full cost. The term "matching" is often used when the sponsor requires cost sharing of a specific amount or percentage.
  - **b. Voluntary** Cost sharing not required by the sponsor is voluntary. Tuskegee University may contribute voluntary cost sharing in order to increase the competitiveness of a proposal or to fall within know funding levels.

Proposals involving cost sharing must be approved by the Provost and the Vice President for Finance and Chief Business Officer. The Cost Sharing and Matching Sources (CSMS) Form (Appendix J) is used to process, approve and track the specific sources of cost sharing and matching funds.

**4. Special requirements (facilities, equipment, personnel):** The principal Investigator must provide detailed information on any project that will require the University to renovate existing space, construct new space or obtain additional space via a lease agreement; the use of high-tech equipment that requires specialized training or certification to operate or maintain; or other resources that may represent a significant investment on the part of the University. The PI must include this information

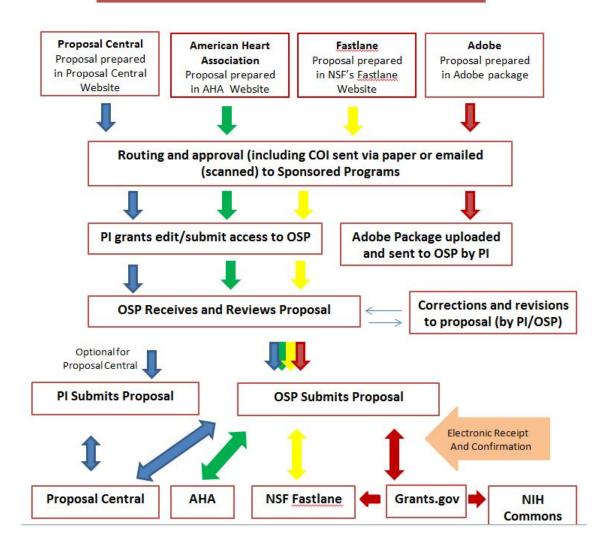
in the program summary. The OSP will forward these documents to the appropriate University officials for review and approval.

#### ELECTRONIC PROPOSAL SUBMISSION PROCEDURES

It is the Division of Research and Sponsored Programs and Tuskegee University policy that Principal Investigators (PIs) obtain authorized campus approval BEFORE electronically submitting proposals, using the Internal Proposal Routing Form (IPRF), even in cases where the sponsoring agency allows PIs to directly submit to it. The IPRF will bear appropriate endorsement signatures (PI, Department Head, Dean, etc.) before forwarding to the Office of Sponsored Programs (OSP). In the case of a proposal which involves faculty members from different departments and/or colleges, it is necessary to secure signatures from each area.

Close to the conclusion of the routing and approval process, the proposal is entered either by the OSP or by the PI (as per prior agreement) into the appropriate agency electronic research administration system. Most agencies use Grants.gov (Adobe application package) but some maintain their own proprietary sites like the National Science Foundation's Fastlane or the National Institute of Health's NIH eRA Commons. The OSP has expertise in all of these systems and will guide the PI toward what documents are required by each agency for transmission into these systems. Although some sponsors may provide the rare opportunity to submit either on paper or electronically, in the interest of the environment, the OSP will encourage the proposal to be submitted electronically. This commitment is consistent with the federal Government Paperwork Elimination Act and supports the goal of conserving University resources. The OSP does not provide preparation, duplication, or compilation assistance for paper-based proposals that are not consistent with this guideline. If an electronic submission option is provided by a sponsor, the OSP will submit the proposal electronically.

#### Summary of Electronic Proposal Submission Process at TU



#### TRANSMISSION OF A COMPLETED PROPOSAL

Each electronic submission system has a different process for the submission of proposals to the intended agencies. It is not uncommon for the actual submission process to take hours in the submission que. The OSP recommends that for all electronic submissions, that the majority of the proposal content be transmitted to the OSP for upload to the agency system **three working days prior to the submission deadline.** Although the proposal may be in draft form at this time, it is **mandatory** that the application be finished and ready to be submitted **48 hours** before the grant application due date. OSP will not submit a proposal received the same day, unless authorized by the Vice President for Research and Sponsored Programs, Provost or President of the University.

The Office of Sponsored Programs does not take responsibility for the on-time delivery of proposals that do not allow for this margin and the OSP does not have any sway with the agencies if the system rejects the proposal for not meeting the timed deadline.

#### **SUBMISSION OF JOINT PROPOSALS (Partnership/Collaborations)**

If a proposal is submitted jointly with another institution, the authorized officials of both institutions must sign the proposal. If Tuskegee University includes another institution as a subcontractor, a statement of work and budget for the subcontract must be signed by appropriate officials of that institution. A letter of support from an authorized official of the partnering institution should be included in the proposal. Any certifications required of Tuskegee University by the sponsor are also required by the partner/collaborator and should be submitted to the OSP at the time the final copy of the proposal is submitted.

#### FINANCIAL CONFLICT OF INTEREST POLICY

Applicable to proposals being submitted to government agencies

#### What is required?

Federal regulations require institutions to have policies and procedures in place that ensure that investigators disclose any significant financial interest that may present an actual or potential conflict of interest relationship to externally sponsored projects. Such disclosure must be made prior to the submission of a proposal for funding, and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced, or eliminated prior to the expenditure of any funds on an award. If a new reportable significant conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required.

#### Who is covered?

"Investigator" means the principal investigator/project director, co-principal investigator, and any other person at the University who is responsible for the design, conduct, or reporting of research, education, or service activities funded, or proposed for funding, by an external sponsor. In this context, the term "investigator" includes the investigator's spouse and dependent children.

#### What must be disclosed?

Each investigator shall disclose all significant financial interests:

- 1. that would reasonably appear to be affected by the research, educational, or service activities funded, or proposed for funding, by an external sponsor; or
- 2. in entities whose financial interests would reasonably appear to be affected by such activities.

#### What is covered?

"Significant financial interest" means anything of monetary value, including but not limited to: salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). This does not include:

- 1. Salary, royalties, or other remuneration from the Tuskegee University;
- 2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- 3. Income from service on advisory committees or review panels for public or nonprofit entities;
- 4. An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, or, constitute more than a five percent ownership interest in any single entity; or
- 5. Salary royalties, or other payments that when aggregated for the investigator and the investigator's spouse and dependent children over the next twelve months, are not expected to exceed \$10,000.

#### **Disclosure Procedures:**

- All investigators must disclose their significant financial interests utilizing FCOI Disclosure form and attaching all required supporting documentation. The completed form and packet must be submitted to the Office of Grantsmanship and Compliance, 103 James Center.
- In accordance with Federal regulations, a complete disclosure must be made by investigator(s) prior to submission of the proposal.
- Resolutions to conflicts of interest must be articulated in writing and signed by the investigator(s) and relevant dean(s) prior to expenditure of any award funds.

#### **Instructions for PHS Investigators**

PHS investigators can access the online tutorial at <a href="http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm">http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm</a>. Upon completion of the tutorial, each investigator should generate a Certificate of Completion and send a copy of that certificate to <a href="mailto:fmgrant@mytu.tuskegee.edu">fmgrant@mytu.tuskegee.edu</a>.

Please retain a copy for your records.

**Before Proposal Submission:** Under PHS Regulations, you must submit a COIC Disclosure **prior to** proposal submission. If you fail to comply with the disclosure requirements, **you** *will* **be prevented from applying for PHS funds.** 

**Prior** to submitting a proposal to PHS, you must have a completed the COIC Disclosure Standard Form on file within the last 12 months.

**Before Expenditure of Funds:** PHS Regulations require disclosure, training, and management of Financial Conflicts of Interest **before** you can expend funds on a PHS project. **OSP will not set up a PHS Award until you have met these requirements.** 

**Prior** to engaging in PHS-funded research with a Notice of Award date or noncompeting continuation segment, you must:

- Have an up-to-date COI Disclosure Form on file;
- Complete online FCOI training at <a href="http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm">http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm</a>; and
- Have a COI Management Plan in place with the OGC office, if required.

#### CONFLICTS OF INTEREST AND COMMITMENT POLICY STATEMENT

Tuskegee University requires the disclosure, review/approval, and management of external activities or financial interests with the potential to interfere with one or more of the following:

- **Performance of Duties:** University employees are expected to devote sufficient time and attention to their university duties to perform them conscientiously. An external activity with the potential to interfere with the employee's university duties is known as a conflict of commitment.
- **Objectivity:** University employees are expected to be objective in the decisions they make while performing their university responsibilities. Financial or other personal considerations with the potential to compromise an employee's objectivity are known as conflicts of interest.
- **Appropriate Use of University Resources:** The University prohibits the use of its resources, including the university name and trademarks, for personal benefit when such use is detrimental to the university.

All university employees are required to comply with this policy and the procedures, applications, and guidance established for disclosure, approval, and management of conflicts of interest and commitment.

#### **Definitions**

- Conflict of Commitment: An external activity with the potential to reduce the time and attention an employee can devote to his/her university responsibilities, and thus negatively impact his/her performance of assigned university duties, constitutes a "conflict of commitment."
- Conflict of Interest: Any external activity, significant financial interest or management role that has the potential to negatively impact objectivity in the execution of university duties is a "conflict of interest."
- **Consulting:** The term "consulting" refers to professional services to a non-university entity that are not a part of the employee's position responsibilities.
- External Activities: For the purposes of this policy, "external activities" means service and/or organized activities/employment which require a substantial and regular commitment of time, whether compensated or not, for a non-university entity. This term excludes scholarly activities undertaken as a part of the employee's position responsibilities.
- **Immediate Family Members:** For purposes of this policy, an "immediate family member" refers to spouse and dependent children. Domestic partners shall be treated as spouses for purposes of this policy. The definition is different in policies related to nepotism and purchasing.
- Management Role: Management role refers to a position in a non-university entity with oversight over or responsibility for the entity's strategies and/or operations. Examples include director, scientific director, board member, line officer, etc.

- Non-University Entity: The term "non-university entity" includes for-profit or not-for-profit entities outside of the university, such as corporations, companies, partnerships, sole proprietorships, associations and governmental entities (federal, state or local). The term excludes affiliated entities which act for the benefit of the university (such as the Board of Trustees, Alumni Association, TU Foundation, or the like).
- **Professional Activity Leave:** Supervisor-approved leave granted to faculty and staff for external activity such as consulting.
- **Significant Financial Interest:** A "significant financial interest" is any financial interest that has the potential to compromise an individual's objectivity. The dollar value that is considered "significant" for the purposes of this policy is determined by the relevant federal or state law, or agency policy. See "What is covered" above.
- Ownership of, or rights held in, intellectual property or research materials (which may include rights to receive royalties), the value of which may be affected by the outcome of the employee's university activities. Excepted are intellectual property and research materials held by the TU Foundation.
- Any of the above applicable to the employee's spouse and/or dependent children.
- University Employee: University employees for the purposes of this policy include all full-time and parttime faculty, professional and scientific staff, merit staff, contract employees, graduate assistants, and
  post-doctoral scholars. For the purposes of this policy those persons designated as emeritus faculty who
  receive sponsored funding through the university and those persons with uncompensated faculty rank,
  such as affiliates, collaborators, and visiting faculty are considered university employees; casual hourly
  employees are not considered university employees. The definition of employee is different for conflict of
  interest vendor and nepotism policies.

#### **Management Plans**

Management plans are required for external activities, significant financial interests and/or management roles with the potential to impair an employee's ability to perform his/her university duties responsibly and with integrity. The form and content of management plans vary depending on the nature of the financial interest or management role and the presumed risks. For some activities, disclosure and approval by the supervisor may be sufficient. Other activities require a written plan that describes the conflict; specifies the actions to be taken to manage, reduce, or eliminate the conflict; and defines the effective period of the plan.

Specific guidelines for when and how to develop management plans are described in the procedures, applications, and guidance section. All written plans must be reviewed and updated no less than annually for as long as the conflict exists.

#### **Disciplinary Actions**

Failure to comply with this policy may result in sanctions or disciplinary actions in accordance with the Tuskegee University misconduct policies and procedures.

#### POST AWARD ADMINISTRATION (NON-FINANCIAL)

Post-award administration is handled within each department unless problems arise or prior approval is required from the sponsor. OSP is considered the liaison between the sponsor and the University and will intervene if there are problems. OSP must approve all requests for modifications or prior approvals to existing agreements, will provide assistance in interpretation of rules, regulations and other legal requirements, and also assists in closeout once the award period ends.

#### PRE-AWARD AUDITS AND NEGOTIATIONS

<u>PRE-AWARD AUDITS</u>: On occasion, a funding agency will require a pre-award audit or some other type of negotiation prior to approving a proposal and issuing an award notice. Because these actions are considered part of the review process, the Principal Investigator must work closely with the OSP staff to ensure the timeliness and accuracy of information submitted to the funding agency. Any adjustments made during pre-award audits or negotiations, or at issuing of an award notice, must be submitted to the OSP for processing and approval by appropriate officials at Tuskegee University. Copies of these documents must be on file in the OSP before a budget is set up.

Pre-award audits are handled by the OSP. These audits may include a detailed review of programmatic and/or fiscal items in the proposal, and require the collection of documents from several offices on campus. The OSP staff will coordinate the collection and review of information and material from all appropriate sources on or off campus, and prepare the final document for submission to the funding agency and/or prime contractor.

<u>PRE-AWARD NEGOTIATIONS</u>: The OSP staff, in conjunction with the PI, will handle any negotiations with the funding agency or prime contractor during the pre-award phase. Negotiations may result in changes in personnel (project participation and/or time and effort), budget (matching funds, rate of indirect cost reimbursement, etc.), project period program continuation, or other obligations on behalf of the funding agency, Tuskegee University or other entities including prime contractors or sub awardees involved in the project.

#### ACCEPTANCE OF AN AWARD

An award to the University from a sponsoring agency serves as a legal document which obligates the University to a financial and/or contractual commitment. An award may be in the form of a letter issued by an authorized agent of the sponsoring organization, check or it may consist of a complete contractual document. In some cases acceptance by the University and subsequently by the sponsoring agency is required before the award is in force. In other cases, no formal acceptance is required.

The OSP will consult with the PI if the award differs from the submitted proposal so that the award may be accepted, modified or rejected. No charges may be incurred against the project until such time as the OSP has verified and received the award notification from the sponsor. Under certain circumstances, receipt of the actual award documents authorizing expenditures for the project may be delayed. If the delay will seriously impede the course of the project, it is possible to obtain permission to initiate expenditures for a short time in advance of the actual account being set-up. The PI should contact OGCA to discuss options.

Upon acceptance of an award, the PI of the sponsored project is directly and totally responsible for adhering to the applicable funding source restrictions and technical conduct. The Office of Grants and Contracts Accounting (OGCA) and the Department/Dean's office monitor sponsored funds expenditures. OGCA also prepares and submits agency invoices and reports of expenditures.

Note: If the PI receives an award notification directly, the PI must send the award notification to OSP in order to initiate the award set-up/process. If OSP receives an award notification in which there is no pre-award file, OSP will utilized the Award Processing Form (APF). See appendix F for instructions.

The OSP handle all post award non-financial activities after the award is issued by the sponsor and accepted by the University. OSP examine the award document to make sure all the conditions for acceptance have been met and prepares the Budget Adjustment Request (BAR) as required by the University.

#### **Sponsored Project Files**

At the start of a project, OSP will set up a project file which includes at a minimum:

- The proposal and budget
- The award document
- The Internal Proposal Routing Form (IPRF)
- Any other information which may be needed for reference.

#### **Processing the Budget Adjustment Request (BAR)**

The Budget Adjustment Request (BAR) is a form used by OSP in the initial set up of a budget and any increases or decreases in the project budget. It is prepared in triplicate for each budget adjustment requested. The OSP will give fund and department (first seven digits) for grant accounts with project number to be assigned by VP for Budgets and Planning. A BAR should not be done unless there is a Notice of Grant Award and a proposal on file. A completed BAR, along with four (4) copies of the budget/budget narrative, and two (2) copies of the award document should be sent to the Office of Budget and Planning. Copies of the above are retained in the sponsored project file. Once the yellow copy is returned, OSP will forward a copy of the detailed budget and a transmittal letter to the PI. See appendix G.

# BUDGET CHANGES, EXTENSIONS AND MODIFICATION POST-AWARD ADJUSTMENTS

#### PURPOSE OF THE PRIOR APPROVAL PROCESS

Federal agencies expect the grantee institution to anticipate the full extent of its financial requirements when applying for a grant. The applicant should be prepared to justify both benefit to the project and calculation of all costs requested. Approval of a grant budget by the sponsor constitutes prior approval for the expenditure of funds for the specific item included in that budget.

Certain federal agencies permit grantee institutions to rebudget between budget categories of the project to meet certain unanticipated requirements in research, training, and program projects, provided that the expenditures are necessary to the successful continuation or completion of the project, that the grant funds are expended in conformity with agency policies and the federal regulations governing the respective grant with the guidelines set forth below. Such departures must enhance and not impede progress of the project toward its stated objective and be in conformance with the rebudgeting guidelines of this policy statement and the policies and procedures of the grantee institution. They may further be conditioned by restriction imposed by the sponsor as a condition for the individual award.

#### **Definitions**:

Rebudget: The transferring of funds from one budget category to another to accommodate unanticipated expenditures (e.g., travel, changes in equipment purchases). This alteration between budget categories does not change the total dollars for the project and is referred to as a rebudget.

Prior Approval: For purposes of these guidelines "prior approval" is defined as the written permission by an authorized official in advance of an act that would result in the obligation or expenditure of grant funds for certain purposes not included in the approved budget as shown on the award document.

Prior Approval Officer: An institutional official responsible for reviewing and approving all budget changes in grants and contracts in accordance with federal guidelines and regulations.

#### PRIOR APPROVAL (INSTITUTIONAL)

Some federal agencies (e.g., NIH, NSF, USDA, DoE, NASA, DoD, DE, EPA) permit the grantee institution local authority to rebudget between budget categories when the expenditures are necessary for the continuation or completion of the project. The Vice President for Research and Sponsored Programs serves as Prior Approval Officer (PAO) for Tuskegee University and in this capacity is responsible for reviewing and approving all requests for budget changes in grants and contracts. All requests will be reviewed in accordance with funding agency allowances and guidelines, government regulations, and institutional policies and procedures. Requests for budget changes must be within these regulations as well as the spirit of the original grant. The procedures for requesting and approving a budget change as follows:

- 1. All requests must be submitted in writing by the principal investigator or program director to the Prior Approval Officer. A copy of the proposal and all grant terms and conditions must be on file before budget changes will be considered.
- 2. The request must indicate the colleague number and the specific lines of the budget to be decreased and increased.

(Note: Participant support costs cannot be rebudget without prior written approval of the program officer, and REU grants can only be given to undergraduate students in accordance with special grant conditions (P.A. 05-592)

- 3. The request must include a detailed and clear justification of the following:
  - a. Decreased Lines (s): why funds are available
  - b. Increased Lines (s) how the funds will be spent
  - c. How the changes will allow goals and objectives to be accomplished.
- 4. If approved, the Vice President for Research and Sponsored Programs will forward the request to the Office Grants and Contracts Accounting for input into the University's accounting system. A copy of the approved request indicating the date entered into the financial system will be returned to the individual submitting the request. This certifies that the request has been completed and funds can be obligated.
- 5. Copies of all requests for rebudgeting will be maintained as part of the permanent file.

#### PRIOR APPROVAL (BY AGENCY/SPONSOR)

Other federal agencies (e.g., MHPF, DoT, DoI, and USAID) as well as state agencies and foreign sponsors have not given Tuskegee University the authority to rebudget between categories, and the rebudget request must be submitted to the agency for sponsor approval. This letter of request must be signed by the PI and the Vice President for Business and Fiscal Affairs, if applicable. Some sponsors require the signature of an institutional official before they will act upon such a request, therefore, the letter should be routed through the Sponsored Programs office before it leaves the University. Copies of all requests for rebudgeting will be maintained as part of the permanent file.

**OTHER MODIFICATIONS** Requests for no-cost extensions and other modifications to grants and contracts should be made in writing through the Office of Sponsored Programs for submission to the funding agency at least 60 to 90 days prior to the expiration date. In cases where expanded authority enables Tuskegee University to grant extensions, the request should be submitted to the Office of Sponsored

Programs at least 30 days prior to the expiration date. The request should contain a summary of progress and an explanation of the need for an extension of time.

## The fact that funds remain at the expiration of an award is not in itself justification for a no-cost extension.

The OSP (Grants Specialist) will submit a Pre-Closeout Notice to the PI ninety (90) days prior to the project's scheduled termination date. See appendix H. At this point, the PI should assess the status of the project and determine whether the project will be completed on time or whether an extension will be required to complete the approved goals and objectives of the project. If required, the request for an extension will be handled in accordance with the terms and conditions of the award (i.e., as a grantee-approved extension with appropriate justification or as a formal request to the sponsoring agency with appropriate justification). The OSP will advise the PI and coordinate the appropriate process for extending the project.

If it is determined the project is on schedule for closeout, then the activities will continue until the current termination date and final closeout will proceed.

#### REPORTING

Technical reports are the responsibility of the PI and should be prepared in a timely manner and according to the terms and conditions and reporting requirements of the funding agency. Copies of all technical reports should be forwarded to the OSP to be placed in the permanent file.

#### PUBLIC ACCESS POLICY

Beginning in 2008, the National Institutes of Health (NIH) made it mandatory for funded investigators to submit final versions of their manuscripts to <u>PubMed Central</u>, the National Library of Medicine's digital archive. All NIH grantees must deposit their peer-reviewed articles upon acceptance for publication and make them available to the public **within 12 months after publication**. The legislation came after many years of lobbying by advocacy groups for such open access language and just as many years of opposition by publishers.

#### What this means for NIH-funded researchers.

- All peer-reviewed articles arising from NIH funds must be submitted to PubMed Central (PMC) upon acceptance for publication.
- NIH applications, proposals, and progress reports must include the PubMed Central reference number (PMCID) when citing an article that falls under the policy and is authored or co-authored by the investigator, or arose from the investigator's NIH award.
- **Beginning July 1, 2013** investigators who are not in compliance with the policy will experience delays in the processing of non-competing continuation grant awards.

It is the responsibility of the OSP to assign roles in NIH's eRA Commons grants administration system to gain access to the Public Access Compliance Monitor (PACM). The University's Head Librarian will recommend to OSP the name of the individual selected for the Public Access Compliance Report (PACR) role. Users with the Public Access Compliance Report ("PACR") role have access to run and review the compliance report for the University.

#### REDUCTION IN PRINCIPAL INVESTIGATOR/CO-PI EFFORT

#### **Federal Awards**

If the Principal Investigator (PI) and/or Co-PI effort on an award is reduced by more than 25% of the effort committed in the funded proposal, federal regulations require that **prior approval** be obtained from the federal sponsor.

• Example 1: A PI indicates 30% effort commitment on a funded proposal. After the award is made the PI wishes to reduce his/her effort to 25% (a reduction which is less than 25% of the originally proposed effort).

Shift Calculation:  $(30\% - 25\%) \div 30\% = 16.6\%$  change in effort (The federal sponsor does not need to be notified.)

• Example 2: A Co-PI indicates 20% effort commitment on a funded proposal. After the award is made the Co-PI wishes to reduce his/her effort to 10% (a reduction which is greater than 25% of the originally proposed effort).

Shift Calculation:  $(20\% - 10\%) \div 20\% = 50\%$  change in effort (The federal sponsor should be notified.)

When a federal sponsor needs to approve a reduction in the PI's/Co-PI's time, the PI/Co-PI should contact his or her assigned Grants Specialist in OSP as soon as possible. OSP will require the PI/Co-PI to provide a letter requesting approval in the reduction in time; OSP will then submit the request for approval on the PI's behalf.

Failure to involve OSP in this process can result in delays in sponsor approval as well as audit issues if the sponsored project is selected for review under the University's annual A-133 audit.

Note: For NIH awards these requirements also apply to senior or key personnel designated by NIH in the Notice of Award.

#### **Nonfederal Awards**

Nonfederal sponsors also anticipate that the PI and/or the Co-PI will spend the time and effort on the funded project that was committed in the funded proposal. The terms and conditions of the nonfederal award will govern whether changes in PI/Co-PI or other personnel effort will need to be reported or if sponsor approval will be required for a reduction in effort.

PIs and departments should review the specific terms and conditions of their award and consult with OSP if they have any question about the sponsor's requirements.

#### CHANGE OF PRINCIPAL INVESTIGATOR

Circumstances may on occasion warrant the designation of a temporary or permanent PI. A sponsor must be advised and approval granted before a new principal investigator may be designated. If the PI leaves the University and it is necessary to get a replacement, such requests must bear the signature of the department head and the dean of the college. If the PI is a Vice President, the request should bear the signature of the next higher authority.

The request to the sponsoring agency for a designation of a new PI will state the reasons for the change and will include curriculum vita of the PI-designate. Such requests must be submitted to the OSP for institutional endorsement, before forwarding to the sponsor.

#### TRANSFER OF GRANT OR CONTRACT

To another institution: The PI who is transferring to another institution may wish to continue his or her sponsored research project there. Steps may be initiated to transfer the grant or contract only upon concurrence of the department head and the Provost/Chief Academic Officer. Permission must be obtained from the sponsoring agency for such transfers (transfers are by no means automatically granted by all sponsors); arrangements must proceed through the OSP. There may be instances in which the University may elect to retain a project and appoint an alternate/co-principal investigator; this also requires agency approval.

**From another institution:** A faculty member coming from another institution may have a sponsored project he or she wishes to transfer to Tuskegee University. Such transfer requires the home institution's approval in addition to the approval of the sponsoring agency. A new proposal (or revised original) with new budgetary information must then be processed at Tuskegee University through the normal routing and approval cycle, prior to submission to the sponsoring agency.

#### FINAL CLOSEOUT

Closeout of a project means that the period of performance or the time allotted for work and completion is due and it is time to cease expenditures and bring all activities to an end. Closeout also means the submission of all final deliverables/final reports (financial, progress, property, subcontract, patent, etc.). Upon submission of all required documents to the sponsor, the project file is placed in the terminated files and retained in accordance with the appropriate retention schedule (normally, records must be retained for three (3) years after submission of the final financial report, or in the case of litigation, records must be retained until final resolution.

#### CLOSEOUT PROCEDURES FOR SPONSORED PROGRAMS

The close out process for sponsored programs requires coordination and cooperation between the principal investigators and the OGCA. An effective and efficient process is necessary to ensure that sponsoring agencies receive the required final technical and fiscal reports within the due dates established under the terms and conditions of the awards. If the University fails to file these reports on a timely basis, it may be unable to receive final payments for the work performed and/or obtain continuation awards, renewal awards or entirely new awards from the affected sponsors. Therefore, the timely submission of required technical and fiscal reports is an important goal for the University. In order to achieve this goal, the University has developed the following policies and procedures governing the close out process.

- 2. Reporting Responsibilities: Principal Investigators (PIs) are responsible for preparing and submitting all technical reports and disclosure statements associated with their projects. The OGCA financial analyst, working in conjunction with the PIs, is responsible for finalizing the costs associated with sponsored projects. The OGCA financial analyst is responsible for preparing and submitting final financial status reports required by sponsoring agencies by the deadlines established.
- 3. <u>Final Costs</u>: All financial obligations must be met prior to the grant close out. Since most agencies require the final report within ninety (90) days of the project end date, OGCA will review program expenditures and notify the PI of final expenditures to be reported to the funding agency. If at the conclusion of this process any unexpended project funds remain, they will be de-obligated/returned to the sponsor by the OGCA with the final financial report.
- 4. <u>Technical Reports</u>: Technical reports must be filed with the sponsor within the due dates established under the terms of the award. In order to effectively respond to inquiries received from sponsoring agencies concerning outstanding technical reports, the PI is requested to copy the OSP on the cover letter transmitting the report to the sponsor and, if necessary, provide OSP with

a paper copy. The OSP retain a copy of the technical report on file for examination upon A-133 audit and as a backup in the event the report is lost in transit or misplaced by the PI or sponsoring agency.

#### **POST AWARD ADMINISTRATION (Financial)**

The Office of Grants Contracts (OGC) establishes the account and monitors expenditures and receivables, and is responsible for assisting the PI in developing and submitting financial reports. Fiscal management oversight is provided by a combination of the Department, the College and OGC.

#### PROCUREMENT PROCEDURES

Goods and services are requested by requisition and obligated in the Purchasing Department where the Purchase Order is generated. All expenditure documents require the signature of the Principal Investigator. Documents are reviewed for the availability of funds, period of availability, and compliance with agency and university guidelines in the Office of Grants and Contract Accounting. These documents are processed within 2-3 business. Forms not meeting all requirements are returned to the department for corrections.

Requisitions processed on a grant that are near its expiration date should be noted "GRANT ENDS" with the date indicated. FINAL PURCHASE REQUESTS SHALL BE SUBMITTED AT LEAST 30 DAYS PRIOR TO THE GRANT'S END DATE TO ENSURE GOODS ARE OBLIGATED ANDRECEIVED WITHIN THE PERIOD OF AVAILABILITY.

#### **Change Order/Cancellation Forms**

Change Order/Cancellation Forms require the signature of the Principal Investigator, as well as Office of Grants and Contract Accounting prior to submission to the Purchasing Department. (See Purchasing Policy)

#### **Property Inventory**

Inventory is maintained by the Property Manager in the Controller's Office. (See Fixed Assets Policy)

#### **Travel Advances**

Travel advances are issued to university employees for approved foreign travel. Additionally travel advances are issued to faculty/staff accompanying students or who are responsible for student travel. Expense reports and any unused funds should be submitted within fourteen (14) days of return from travel. Original receipts for all expenditures are required as specified in the University Travel Policy document and the Federal Travel Regulations.

#### **Participant Costs**

Participant costs are budgeted and accounted for separate from other costs on the general ledger. These amounts are payable either directly to the student, or should be credited to the student's account with the University. The following student assistance is available on grants and contracts:

#### STUDENT EMPLOYMENT

#### **Work Study**

A student contract request is submitted by the Principal Investigator to the Office of Grants and Contract Accounting for approval. The request includes the period, number of hours weekly the student can work the rate of pay and total amount awarded. A Student Contract is generated in the Office of Student Financial Services for students who qualify. Timesheets certified by the supervisor and/or principal investigator are forwarded directly to the Office of Financial Aid Services for processing and paymen

#### **Stipends**

A request is submitted by the Principal Investigator to the Office of Grants and Contract Accounting for approval. The request includes the period, payment by period and the total amount awarded. Requests are approved in the Office of Student Financial Services prior to issuance of payment by the Accounts Payable Office.

#### Other Assistance

Awards for the following types of assistance are credited directly to the students' accounts after approval is granted by the Principal Investigator, Office of Grants and Contract Accounting and the Office of Student Financial Aid Services:

- Tuition
- Housing
- Scholarship/Fellowship
- Books

**NOTE:** All student assistance must be approved by the Office of Student Financial Services. Failure to notify could adversely impact other scholarships and financial aid available to the student.

#### SUB-RECIPIENT MONITORING

The letters requesting copies of the A-1 33 reports are mailed out annually (usually in February). The Office of Grants and Contract Accounting only reimburse a sub-recipient after these reports are on file. Payments may be withheld if the sub-recipient does not submit the A-133 reports. A-133 reports are also reviewed by the Office of Grants and Contracts to determine if any findings were discovered which would require additional monitoring. If any findings related to the program are disclosed, additional monitoring processes would be put in place.

#### Administration

Subcontracts are issued by the Office of Sponsored Programs and administered in the Office of Grants and Contract Accounting. A separate line item is established in Datatel for subcontracts. The Principal Investigator submits a Requisition for the total amount of the subcontract at the beginning of the award. A change order is processed in conjunction with any modifications or amendments to the agreement so that Purchase Order amount mirrors the awarded amount. Invoices for reimbursement are received from the subcontractor in the Office of Grants and Contract Accounting and forwarded to the Principal Investigator for

review and approval prior to submission to Accounts Payable where payment is issued. Payment should be processed within 30 days of receipt of the invoice. The Principal Investigator may elect to withhold payment for non-compliance with the budget or other required deliverables.

#### **Monitoring**

A-133 Compliance Reports are requested by the Office of Sponsored Programs from all subcontractors. The report is forwarded to the Office of Grants and Contract Accounting where the Director reviews for findings noted. If finds are noted related to funding awarded by the university, the Director follows up with the subcontractor for responses and corrective action plans. A copy of the report is maintained in the Office of Grants and Contract Accounting.

#### FINANCIAL REPORTING

All financial reports are prepared and submitted by the Office of Grants and Contract Accounting. The requirements vary; they may be monthly, quarterly, annual or final submissions. It is very important that the analysts review the requirements thoroughly and complete the Chart of Accounts Legend. This information will assist the analyst and the supervisor in ensuring that required reports are prepared timely. Financial Analysts are required to submit financial reports and invoices to the granting agencies in a timely manner.

#### **Invoices/Financial Reports**

The reporting forms vary among granting agencies. Forms and instructions may be accessed at <a href="https://www.whitehouse.gov/omb/grants\_forms">www.whitehouse.gov/omb/grants\_forms</a>. Requests for advance or reimbursement (SF270), Federal Financial Report (FFR425), and/or the Federal Cash Transactions Report (SF 272) are standard reports used. These reports are submitted to a designated person/division at the granting agency by a specified due date.

Financial Analysts prepare reimbursement requests on a monthly or quarterly basis. Analysts may include a detailed breakdown of the costs incurred (i.e. salaries, equipment, etc.) in accordance with granting agency requirements. A general ledger summary report is used to determine the cumulative expenditures for the reporting period and calculate indirect costs. The Director reviews and approves all financial reports and invoices for accuracy.

#### **Matching Funds/Cost Share**

At the end of a reporting period, such as a month or quarter, the analyst records a matching journal entry for expenditures incurred. Matches are primarily funded through expenditures of unrestricted funds for purposes that are necessary and reasonable for the program in question. The Principal Investigator (PI) is responsible for identifying the matching expenses. When the University, voluntarily or involuntarily, commits matching funds, it must be reported on the financial report and is included as part of the supporting documentation.

Completed financial report, the income reconciliation schedule, GL Summary Report and any adjustments for income and expenditures are forwarded to the Director for review. The Director reviews the financial report and schedules for accuracy then records the amount due to the Billed Grants Receivable. The analyst is responsible for transmitting the report to the granting agency. In the rare instance that the university cannot meet the reporting requirement by the specified date, it is the responsibility of the financial analyst to request written approval from the granting agency for an extension.

Financial reports with all supporting documentation and schedules (including sections a &b above) are filed in the grant folder and made available to the auditors upon req

#### LETTERS OF CREDIT

A Letter of Credit grant is one in which the funds are received via an electronic/wire transmission and deposited directly into a specified bank account. This is noted on the Notice of Grant Award document.

Payment requests (or draw-downs) are usually made on a monthly basis but can be made more frequently based on the cash needs of the university. Federal regulations require funds requested in advance be disbursed within three business days. The drawdown requests are prepared by Financial Analysts and reviewed by the director before forwarding to the Office of the Chief Financial Officer for processing.

#### FINANCIAL REPORT STATUS LOG

On the last day of each month, a listing of reports (monthly, quarterly, semi-annual and final) is generated by the Director of Grants and Contract Accounting. This document reflects, by analyst, the GL Account Number, Funding Agency, period, etc. for which reports are due. This report is generated one month in advance of the report's due date (e.g. reports due in September will be generated on the last day of August).

A master list of deliverables is printed for the analysts to record the completion date and initial for the required reporting period. The Director or Senior Analyst monitors for completion of all reports.

#### GRANTS AND CONTRACTS CLOSE-OUT

Closing out a sponsored project involves multiple steps. In order to prepare the final financial reports, the following should be reviewed:

- All financial obligations must be met prior to grant close-out. Unliquidated Obligations (Purchase Orders) cannot be included as expenditures. (See Procedure 2.20 Change Order/Cancellation)
- The analyst reviews the account to ensure all related expenditures are posted. These include both direct and indirect costs associated with the project.
- The analyst notifies the Principal Investigator of final expenditures to be reported to ensure there are not any unrecorded financial obligations related to the project

The final financial report is submitted after all obligations have been paid and/or cancelled.

#### FINANCIAL STATEMENTS AND A-133 AUDIT

OMB Circular A-110 requires an annual independent audit of all federal grants and contracts. The Office of Grants and Contract Accounting prepare schedules needed in conducting *The Financial Statements and A-133 Compliance Audits*. The following schedules are prepared in support of these audits:

- Grants Receivable Schedule
- Sub-recipient Expense Schedule
- The Schedule of Federal Awards

The SCHEDULE OF FEDERAL AWARDS is prepared at year-end and includes the expenditures for all direct and indirect federal funding and their related CFDA numbers for the audit year. This data is compiled

using the GLTB and the Chart of Accounts. The Research and Development Cluster and Financial Aid are always included as major programs. All others are grouped as single federal programs as direct or indirect expenses.

The auditors determine the major programs and makes selections for testing. A detailed GLBS report is printed to show all accounting transactions for the selected accounts. After the auditors have made their selections, the grant accounting office distributes the requests to the appropriate departments to provide the supporting documentation as needed. The Senior Analyst maintains an Open Items Listing to ensure compliance. The selected grant folders are provided upon the auditor's request.

#### SUBAWARD POLICY

As the prime recipient of a sponsored programs award, the University is accountable to the federal or non-federal sponsor for the subrecipient's action with respect to compliance with the Office of Management and Budget (OMB) Cost Principles and administrative compliance matters. Therefore, the University must monitor the recipients' activities in order to provide reasonable assurance that subrecipients administer subaward funding in compliance with the sponsor requirements.

#### SUBRECIPIENT MONITORING POLICIES AND PROCEDURES

PURPOSE:

The purpose of this policy is to provide guidance to enable the University to be in compliant with requirements related to sponsored projects subawards, in accordance with the requirements set forth in Title 2, *Code of Federal Regulations* (CPR), Part 215 "Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations," and Office of Management and Budget Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

#### POLICY/PROCEDURE

#### 1. Applicability

This policy applies to all subawards funded directly or indirectly from federal funds or those used as cost sharing or matching for federally funded programs. This policy applies to subawards with state and local governments, institutions of higher education and non-profit organizations. This policy does not apply to vendor agreements, agreements with for-profit entities, or works for hire.

#### 2. Definitions

- a. Award means financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money, by the federal government to an eligible recipient. The term does not include: technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; and contracts that are required to be entered into and administered under procurement laws and regulations.
- b. *Vendor* means a dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of a federal program. These goods or services may be for an

organization's own use or for the use of beneficiaries of the federal program. Characteristics indicative of a payment for goods and services received by a vendor are when the organization:

- (1) Provides the goods and services within normal business operations;
- (2) Provides similar goods or services to many different purchasers;
- (3) Operates in a competitive environment;
- (4) Provides goods or services that are ancillary to the operation of the federal program; and
- (5) Is not subject to compliance requirements of the federal program.
- c. Subaward means an award of financial assistance in the form of money or property in lieu of money, made under an award by a recipient to an eligible subrecipient. The term includes financial assistance when provided by any legal agreement, even if the agreement is called a contract, but does not include procurement of goods and services nor does it include any form of assistance which is excluded from the definition of "award" in paragraph a. of this section.
- d. Subrecipient means a non-federal entity that expends federal awards received from a pass-through entity to carry out a federal program, but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency. Characteristics indicative of a federal award received by a subrecipient are when the organization:
  - (1) Determines who is eligible to receive federal financial assistance and the type of assistance to be received:
  - (2) Has its performance measured to determine whether the objectives of the federal program are met;
  - (3) Has responsibility for programmatic decision-making;
  - (4) Has responsibility for adherence to applicable federal program compliance requirements; and
  - (5) Uses the federal funds to carry out a program of the organization (as compared to providing goods or services for a program of the pass-through entity).

#### 3. Agreement (Contract) Requirements

- a. Agreements (contracts) with subrecipients (subcontractors) will be drafted according to a template approved by TU's legal counsel.
- b. Agreements with subrecipients that meet the applicability tests outlined in section 1 will include the information contained in sections 4.a. and 4.b.
- c. In addition, agreements with subrecipients that meet the applicability tests outlined in section 1 will contain the following clauses:
  - (1) Allowability of Costs
    - (a) Bills submitted to TU for payment will contain the following certification: "I certify to the best of my knowledge and belief that the data above are correct and that all outlays were

made in accordance with the contract terms and conditions, and that payment is due and has not been previously requested."

(b) In the event that any payments to the subrecipient under this contract are subsequently disallowed by TU or the prime contractor as items of costs of this contract, the subrecipient shall repay TU, on demand, the amount of any such subsequent payments to be made to the subrecipient hereunder, without prejudice, however, to the subrecipient's right thereafter to establish the allowability of any such item of cost under this contract.

#### (2) Institutional Information

Subrecipient shall submit to Tuskegee University the following information in compliance with the Federal Funding Accountability and Transparency Act (FFATA) of 2006:

- (a) Legal name
- (b) Descriptive title of subaward project
- (c) North American Industry Classification System (NAICS) Code (for federal contracts only)
- (d) Full address of the legal entity, including the congressional district
- (e) Full address of the primary place of performance, including the congressional district
- (f) Data Universal Numbering System (DUNS) number
- (g) Tax identification number
- (h) Total compensation and names of top five executives, unless exempt from reporting such information according to FFATA requirements

#### (3) Retention Requirements for Records

Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of at least three years from the date of the final payment on the subcontract. If any litigation, claim, or audit is started before the expiration of the three-year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action is taken.

#### (4) Access Requirements for Records

TU and its representatives, the federal awarding agency, the inspector general, comptroller general of the United States, or any of their duly authorized representatives, have the right of timely and unrestricted access to any books, documents, papers, or other records of recipients that are pertinent to the awards, in order to make audits, examinations, excerpts, transcripts, and copies of such documents. This right also includes timely and reasonable access to a recipient's personnel for the purpose of interview and discussion related to such documents. The rights of access in this paragraph are not limited to the required retention period, but shall last as long as records are retained.

#### (5) Audits

(a) Subrecipients receiving subawards totaling \$10,000 or more shall submit to TU one copy

of the A-133 reporting package described below when the schedule of findings and questioned costs disclose audit findings relating to subcontracts with TU provided, or when the summary schedule of prior audit findings reported the status of any audit findings relating to subcontracts with TU. The reporting Package shall include the:

- 1) Financial Statements and schedule of expenditures of federal awards;
- 2) Summary schedule of prior audit findings;
- 3) Auditor's report(s); and
- 4) Corrective action plan.
- (b) Or, the subrecipient shall provide written notification to TU that: "An audit of the subrecipient was conducted in accordance with OMB Circular A-133 (including the period covered by the audit and the name, amount, and number of the subcontract(s) provided by TU); the schedule of findings and questioned costs disclosed no audit findings specifically related to the subcontract that TU provided; and the summary schedule of prior audit findings did not report on the status of any audit findings relating to the subcontract that TU provided."
- (c) The audit information required by (a) or (b) of this section shall be submitted within the earlier of 30 days after receipt of the auditor's report(s) by the subrecipient, or nine months after the end of the audit period, unless a longer period is agreed to in advance by the cognizant or oversight agency for audit. In the event that the submissions cannot be made within nine months following close of a budget period, the subrecipient must notify TU in writing of the anticipated date of submission. All submissions required under this article shall be submitted to the following address:

Tuskegee University Office of Sponsored Programs Carnegie Hall 4th Floor Tuskegee, AL 36088

#### (6) Conflict of Interest

Subrecipients will provide evidence that they have a Conflict of Interest policy and procedure that is in compliance with federal regulations. Should any conflicts of interest exist, subrecipients will certify that such conflicts have been reduced, eliminated, or managed. See appendix F.

### 4. Responsibilities of TU's Office of Sponsored Programs and Grants and Contracts Accounting Office

- a. Identify federal awards made by informing each subrecipient of CFDA (Catalog of Federal Domestic Assistance) title and number, award name and number, award year, if the award is classified as research & development (R&D), and name of federal agency. When some of this information is not available, TU shall provide the best information available to describe the federal award.
- b. Advise subrecipients of requirements imposed on them by federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by the pass-through entity.

- c. Monitor the activities of subrecipients as necessary to ensure:
  - (1) Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements.
  - (2) Performance goals are achieved.
- d. Ensure that subrecipients expending \$500,000 or more in federal awards during the subrecipient's fiscal year have met the audit requirements of this part for that fiscal year.
- e. Review management decision on audit findings within six months after receipt of the subrecipient's audit report and ensure that the subrecipient takes appropriate and timely corrective action.
- f. Consider whether subrecipient audits necessitate adjustment of TU's own records.
- g. Require each subrecipient to permit TU and auditors to have access to the records and financial statements as necessary for TU to comply with this part.
- h. Report subawards greater than or equal to \$25,000 in the FFATA Subaward Reporting System (FSRS) by the end of the month following the month in which the subaward was made.

#### POLICY ON INDIRECT COSTS WAIVER

While Tuskegee University expects all its faculty to be engaged in externally funded research, it also recognizes that it may not be possible for the younger members of its faculty to initially attract large grants and contracts which allow the university to charge indirect costs (overhead) at the negotiated rate. The university, therefore, has adopted a policy to accept a reduced indirect cost of 12% on grants and contracts, on a case-by-case basis.

#### **Criteria for Reduction in Indirect Cost**

The Sponsored Programs Office may consider a reduction of indirect cost and/or administrative fees in certain situations when:

- the proposed project is relatively small (\$100,000 direct costs per year or less) and will not require extraordinary effort and/or resources to administer, and will significantly assist the investigator in beginning or enhancing his/her research career;
- seventy percent or more of the project funds are for student research assistantships or materials &supplies for student projects;
- the benefit of the proposed project to the University, in terms of institutional capacity building, is deemed to outweigh the loss of indirect cost revenue;
- the project requires significant institutional cost-sharing that cannot be fully met by other sources;
- the assessment of the full indirect cost rate on a project with a maximum allowable total cost would reduce the amount of direct funds available for project implementation to such an extent that the scope of work or deliverable could not be accomplished.

#### RESPONSIBILITIES

#### **Principal Investigator**

• The principal investigator (PI) is not authorized to negotiate a reduction in the F&A rate with the funding authority on any sponsored project. The PI must make requests for a reduction of indirect cost in writing using the "Request for Indirect Cost Reduction Form (ICRF)", one week in advance of the submission deadline.

#### **Sponsored Programs**

• The Sponsored Programs Office will verify the information on the ICRF prior to submission to the Vice President of Research and Sponsored Programs.

#### Vice President for Research and Sponsored Programs

 The Vice President for Research and Sponsored Programs or his/her designee will make decisions on adjustment of the indirect costs.

#### President

 The President may give institutional approval for an indirect cost reduction in grants that have broad institutional impact.

#### **PATENTS**

To apply for patent researchers must submit a disclosure form to the Office of Grantsmanship and Compliance. The Office Grantsmanship and Compliance work with patent lawyers on all matters dealing with patent applications approved by the Intellectual Property Committee and the Vice President of research and Sponsored Programs. *Details on the Intellectual Policy can be found on the Research webpage*.

#### INSPECTIONS/PERIODIC REVIEW

It is the responsibility of the Office of Grantsmanship and Compliance to organize inspections of all research labs and periodic research activities, of the listed committees.

#### 1. Biosafety Committee

The committee inspects all research laboratories every six months, and submits, to the Vice President, recommendations regarding corrective measures.

#### 2. Animal Care and Use Committee

The committee inspects all animal care and use facilities, every six months, and submit to the Vice President regarding corrective measures.

#### 3. Human Participants Review Committee (IRB)

The committee does a Periodic review of research activities to determine whether approval should be continued on withdrawn.

### **Appendices**

- A. Sponsored Programs Checklist
- B. Internal Proposal Routing Form (IPRF)
- C. Proposal Review Form
- D. Request for Indirect Cost Adjustment Form (ICAF)
- E. Request for Indirect Cost Reduction Form (ICRF)
- F. Subrecipient Financial Conflicts of Interest Disclosure Form
- G. Award Processing Form (APF)
- H. Budget Adjustment Request (BAR)
- I. Pre-Closeout Memo
- J. Checklist for Subaward/Subcontract Close-outs
- K. Cost Sharing/Matching Sources (CSMS)
- L. Human Participants Review (IRB) Committee Application(*Can be found on the Tuskegee University Webpage*)
- M. Radiation Safety Committee Application (Can be found on the Tuskegee University Webpage)
- N. Disclosure Form Application (Can be found on the Tuskegee University Webpage)
- O. Animal Care and Use Protocol (Can be found on the Tuskegee University Webpage)
- P. Biosafety Laboratory Checklist (Can be found on the Tuskegee University Webpage)
- Q. Periodic Review Form (Can be found on the Tuskegee University Webpage)
- **R. Other Related Documents** 
  - 1. Animal Care and Use Committee Manual (Can be found on the Tuskegee University Webpage)
  - 2. Biosafety Manual (Can be found on the Tuskegee University Webpage)
  - 3. Human Participants Review Committee Manual (Can be found on the Tuskegee University Webpage)
  - 4. Radiation Safety Manual (Can be found on the Tuskegee University Webpage)
  - 5. Intellectual Property Manual (Can be found on the Tuskegee University Webpage)

### Tuskegee University Sponsored Programs Checklist

OSP No.	
	Internal Proposal Routing Form – Date received:
	_ Abstract/Project Summary
	Indirect Cost Rate Adjustment Form – Authorization/Date:
	Are all required elements of the proposal included?
	Cover Sheet
	Abstract
	Complete Narrative
	Budget
	□C.V.s
	Statement of Current and Pending Support
	Certifications
	Other Sponsor Requirements
	Budget/Budget Justification
	Does the budget accurately reflect the work proposed?
	☐ Is it calculated correctly?
	Are the correct fringe benefit and F&A cost rates used?
	Have all subcontractors sent letters signed by their authorized institutional official?
	Final proposal as submitted to funding agency
	Notice of award/rejection – Date received:
AWARD	PROCESSING
	Budget Set-Up/BAR # Date to Budget Office:
	_ CL#:
	Orientation with Principal Investigator – Date: (Review terms and conditions, reporting, budget shifts/revisions, and closeout)
OSP Sign	-
	 Date

Tuskegee Unive Proposal Routin	COLUMN TO SERVICE OF THE PARTY	ored Pro	grams In	ternal	Submit TYPs proposal, bu guidelines			
Proposal Title:								
Principal Investigator				Co-Principal	investigator:			
Department			-	Department:				-
Campus Address:					Invectigator:			- 9
Campus Address.				Co-Principal	investigator.			
Campus Phone:				Department:				i i
Campus Fax:				Co-Principal	Investigator:			
E-mail Address:				Department:				
Project Type:	Award Term:		Award Type	c C			Project inv	olves:
Instruction	Now Now		Crant Crant		CFDA:		Human S	
Research	Continuatio	6.	Contract		5 0 50 CC 5 CC 5 CC		Animal S	
Public Service	Competing	Renewal	Subcont	ract			Biohippan	ds
Student Services	Supplement		■ MOA/MC				Protocol con	sent form
Fin. Aid/ Scholarships	Resultances		SE PROPERTY				must be rout	ed to en IRB
Sponsor/Funding Ag				- 8			Sponsor T	ype:
Program to which yo	u are applying:						Federal	
Sponsor Contact Nar	ne & Title:						State	
Sponsor Mailing Add								wernment
oponeon manning man	ous.							NOTHING K
							Private	
Sponsor Phone:	and the second		1.0	Fax:			Internati	
is electronic submiss		Yes	No	-				Flow-thru
Deadline:	Receipt date?	0	Postmark?	<u> </u>			Appropri	ation
PROJECT BUDGET 8	UMMARY: (Plea	se enter all						
Agency Funds Total:	and the second		Indirect Co.	ofe:		Begin date:		
Cash Cost Sharing T			Indirect Co.	st Sharing:		End date:		- 2
% Cost Sharing Requ	ilred:	9	in-Kind Coo	t Sharing:				
Are subgrants includ		Yes	No	the state of the s	imber of subgr	ants include	ed here:	
TU Cash Cost Sharin	g: (Please enter	all amount	s to the near	ect #)				
Department/Unit	GL Account	Object	TU Cost		113/14/11			
Name	No.	Code	Sharing	YR 1	YR 2	YR3	YR 4	FR 6
			\$0					<u> </u>
			ŞD				3	
			\$0				3 3	
Direct Costs			\$0 \$0					80
Indirect Costs	-		\$0 \$0		\$0	\$0	\$D	- 90
Total Cost Sharing			50		50	50	50	50
Time and Effort (Use		The second		- 40	φυ	· · · · · · ·	- 40	
Hime and Entit (the				house and the		CHEST CALLS	1	
30.0	Academic Yr	Time and	Annual	Requested	25520000	Current	2000	
Name	or Summer?	Effort	Salary	Salary	Subtotal	Fringes	1 Otal	Salary
				8 33	\$0	22.00%		\$0
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7)	0	0.00			\$0	22.00%		\$0
Commence of the Commence of th	e University of	Carrier		السيسيين	\$0	22.00%	And the second	\$0
CONFLICT OF INTER	EST CERTIFICA	TION: I have	ve read and u	understand th	e TU Conflict	of Interest P	olloy	Yes No
Will/do you or any member	er of your househol	d or grent sta	fi benefit in cas	in exceeding \$10	0,000 a year from	, or own more	then 5% of th	10
voting stock or controlling	interest in the abo	ve sponsor?		Yes No		Are you or any	member of y	our house-
hold or grant staff affiliate	d with the above so	consor or with	an external ag	ency in any way	that will hinder y	our abilities to	fulfill obligatio	208
to TU, its students or you	colleagues?	Yes	No	(If "yes" to eithe	er or both, please	explain on an	attached she	<b>a</b> 0.
	grande Televisione	Chargo and	and the second	Burgaran -		H		Fr 32
SIGNATURES: Additions Recommended	e signatura is requi	mater of the material	e units commit IDate		g.[Provest] and Approval		- 1	Date
Principal investigator:			LIGHT .			A ALLEYS	11m 3	J-6100
Department Head:			+ + +	VP for Resea	ew Required who	r outrement	1 PM 3	
Department Head:				OSP No:	ren.			
Dearworeday.				USP NO.				

The IPRF requests information that is necessary for a preliminary review of the proposal. Instruction for completing the form is listed below.

- 1. **Proposal Title:** Enter the unique name of the project.
- 2. **Principal Investigator(s):** The name(s), title(s), department(s) and phone number(s) of the individual(s) who will be responsible for developing the proposal.
- 3. **Project Type:** Check the appropriate project type box.
- 4. **Award Term:** Check the appropriate proposal classification box:
  - a. New The proposal has not been submitted by TU before.
  - b. **Continuation** (**non-competing**) A proposal or progress report being submitted to initiate funding of next budget period of a multi-year funded project.
  - c. **Competing Renewal** Check this box for proposals whose original project period has expired and the current submission will request new funding to extend the project for additional budget periods.
  - d. **Supplement** Check for a proposal requesting additional funding to an existing funded award.
  - e. **Resubmission** A revision of an entire proposal which was not previously funded
- 5. **Award Type:** Check the appropriate box.
- 6. **CFDA No:** Provide the Catalog of Federal Domestic Assistance program number, if applicable.
- 7. **Compliance Data:** Check the appropriate box. (attach copy of approval letter, if applicable)
  - a. **Human Subjects:** Indicate whether human subjects or data from human subjects will be used in the project.
  - b. **Vertebrate Animal Subjects:** Indicate whether animals will be used in the project. Provide the IACUC approval number issued by the Institutional Animal Review Board and Use Committee.
  - c. **Biohazards:** Indicate whether or not the project will require use of biohazardous materials by checking the appropriate box.
- 8. **Sponsor/Funding Agency:** Enter the name of the sponsor/agency to which the proposal is being submitted (i.e., NIH, NSF, USDA, etc)
- 9. **Sponsor Type:** Check the appropriate box (i.e., local, state, federal, etc.)
- 10. **Program to which you are applying:** Enter the name of the program to which you are applying (i.e., Research Experiences for Undergraduates REU, IGERT, etc.)
- 11. **Sponsor Contact Name & Title:** Provide the contact person's name at the sponsoring agency, if available.
- 12. **Sponsor Mailing Address:** Enter the mailing address of the sponsoring agency.
- 13. **Sponsor Phone:** Enter the telephone number for the agency's contact person.
- 14. **Is electronic submission required?**: Check the appropriate box.
- 15. **Deadline:** Enter the date the proposal is due to the agency. Provide the receipt date or postmark date.
- 16. **Project Budget Summary:** Enter the total funds (including indirect costs) requested and the amount of indirect cost requested.
- 17. **Project Period:** Enter the entire performance period for which funding is requested (i.e., beginning date and ending date)
- 18. **Cost Sharing Total:** Enter the amount indicated in the proposal that TU will provide for the project. Cost sharing is defined as any contribution of funds or resources toward the full cost of a sponsored program. Many sponsors view cost sharing as evidence of our commitment to a proposed project. There are two forms of cost sharing:
- 19. **Mandatory** Cost sharing is mandatory when a sponsor requires the University to contribute toward a project's full cost. The term "matching" is often used when the sponsor requires cost sharing of a specific amount or percentage.
- 20. **Voluntary** Cost sharing is called voluntary when it's not required by the funding agency Tuskegee University may contribute voluntary cost sharing in order to increase the competitiveness of a proposal or to fall within know funding levels.
- 21. **Percentage of Cost Sharing Required:** Enter the percentage of cost sharing that is required by the agency and any other support from sources other than TU. Letters of support with appropriate approval must be included with the proposal.
- 22. **Are subawards included in budget?** Check the appropriate box.

- 23. **TU Cost Sharing:** Provide the administering department name, GL account number and the amount of cost sharing/matching funds. NOTE: Proposals involving cost sharing must be approved by the Provost and the Vice President for Business and Fiscal Affairs.
- 24. **Time and Effort:** Enter the name of key personnel who will perform work on the project, time and effort that will be spent on the project by each key personnel and the amount of salary/fringes charged directly to the project.
- 25. **Conflict of Interest Certification:** Tuskegee University Conflict of Interest Policy must be read, and any conflict of interest must be reported. The Project Director/Principal Investigator and all co-investigators must check the relevant boxes.
- 26. **Key Signatures:** The signatures of all key personnel are required. Typically this would include the Project Director/Principal Investigator and any Co-investigators listed on the face page of the proposal, Department Head and Dean of the College before submission to the Office of Sponsored Programs for review. If more than one college is involved in the project, each college dean must sign the IPRF.

### **Proposal Review Form**

Tuskegee University Office of Sponsored Programs ● Carnegie Hall 4<sup>th</sup> Floor ● (334) 727-8245

OSP No. \_\_\_\_\_

Name	Phone _	
Department		
Proposal Title		
	COMMENTS	
Abstract/Project Summary		
Problem/Needs Statement		
Institutional Profile/Capability Assessment		
Objectives		
·		
Methodology		
Evaluation		
Budget and Justification		
Other		
Reviewed by:	Phone	Date



# Request for Indirect Adjustment Form (ICAF) Tuskegee University Office of Sponsored Programs

#### For a grant that DOES NOT reimburse indirect cost in accordance with the negotiated agreement with DHHS

<b>Instructions:</b> This form must be submitted to the Office	e of Sponsored	l Programs with t	he proposal.		
DATE:					
Title of Proposed Activity:					
Principal Investigator:P	hone:				
Proposal No					
Verified by:Office of Sponsored Programs/Date					
Indirect Cost Calculation if Negotiated Rate Had Been U	Jsed \$	%			
Actual Indirect Cost Reimbursement in Proposed Budge	et \$	%			
Difference	\$				
If the budget is incomplete and the above amounts are OSP will calculate the exact amount of the difference pr			mount of funding	g allowed by the a	agency. The
Justification/Rationale for reduced Indirect Costs:					
Signatures/Date:					
Principal Investigator/Date			Dean/Date	<del></del>	
		Approval/a			

President



### **Request for Indirect Cost Reduction Form (ICRF)**

Tuskegee University Office of Sponsored Programs

## For a grant that does reimburse indirect cost in accordance with the negotiated agreement with DHHS

<b>Instructions:</b> This form must be submitted to the Office of S	Sponsored Program	ms with the proposa	1.	
DATE:				
Title of Proposed Activity:				
Principal Investigator:Phone:	:			
Proposal No				
Verified by: Office of Sponsored Programs/Date				
Indirect Cost Calculation if Negotiated Rate Had Been Used S	\$			
Actual Indirect Cost Reimbursement in Proposed Budget	\$	%		
Difference \$	5			
If the budget is incomplete and the above amounts are unkn OSP will calculate the exact amount of the difference prior to Justification/Rationale for reduced Indirect Costs:		ximum amount of fo	unding allowed by the agend	cy. Th
Justification/Patronale for reduced indirect Costs.				
Signatures/Date:				
Principal Investigator/Date	-	De	ean/Date	

Approval/date:\_\_\_\_\_

President

#### Appendix F

### Financial Conflict of Interest Disclosure Form

Please refer to the University's Conflict of Interest Policy statement as required. Interest in private firms from which equipment, instruments, materials, or items will be purchased under attached proposal. Salaries or other payment for services (e.g., consulting fees or honoraria) Yes No Equity interests (e.g., stock, stock options or other ownership interests Yes No Intellectual property rights (e.g., patents, copyrights and royalties from such rights) Yes No Other Yes No If "Yes" is checked on any of the above, indicate degree of commitment. Government consultantships: 2. I have engaged in a related extramural program with either a governmental agency or private firm within the 3. past year. \_\_\_\_\_ Yes 4. Other pertinent information: I have reviewed and understand the Tuskegee University's Financial Conflict of Interest Policy. The above information is complete to the best of my knowledge. I agree to update this disclosure during the period of the award as new reportable significant financial interests are obtained. Principal Investigator (Print Name) Principal Investigator Signature Date I have reviewed this disclosure and find no conflict of interest. find conflict of interest. I have referred it to the Provost for further review. Dean Date I have determined that \_\_\_\_\_ no conflict of interest exists. a conflict of interest exists.

VP, Research & Sponsored Programs

Date

# Documentation of Subrecipient Financial Conflict of Interest Policy Disclosure Form Tuskegee University

Conflict of Interest Disclosure applies to any member of the research team responsible for the design, conduct or reporting of data.

Subrecipient Institution	TU Principal Investigator/Project Director
Project Title	Subrecipient Principal Investigator
Subrecipient Award Total	Subrecipient Performance Period: From to
II: Financial Conflicts of Interest (FCOI) (To	pe completed by Subrecipient)
	t it has a conflict of interest policy that it will follow which conforms to the ns, including but not limited to those set forth in 45CFR Part 94 and 42 CFR Part 50
on the above named project disclo	Fies that all personnel involved in the design, conduct and reporting of research data sed to the Institution's designated official(s) the Investigator's significant financial avolved has an identified Financial Conflict of Interest.
on the above named project have dis	fies that all personnel involved in the design, conduct and reporting of research data closed to the Institution's designated official(s) the Investigator's significant financial we have an <b>identified Financial Conflict of Interes</b> t which will be either, managed pient organization.
	OR
at: http://www.tuskegee.edu/resea	Interest Policy established and enforced by Tuskegee University. The policy is found to the policy is found at the above named project. The training course is found at
Names of person(s) working on this pr	eject that are identified as having a conflict of interest are listed below:
By signing below, I certify, to the best of my kagree to disclose new interests that are attained	nowledge that the information reported herein is complete and accurate. I furthe within 30 days.
Signature of Subrecipient Authorized	Representative Date
Printed Name	

### **Award Processing Form (APF)** Tuskegee University Office of Sponsored Programs Carnegie Hall 4th Floor

(334) 727-8245 Office ● (334) 724-4221 Fax

Project Title Funding Agency _	nsored Programs has received an award notification/check on the above reference following items to this office so that we may process your award.	
Funding Agency _	asored Programs has received an award notification/check on the above refere	
	sored Programs has received an award notification/check on the above refere	
	continuing remis to this office so that we may process your awards	enced project
Pro Inte Cor	osal Summary/Abstract rnal Proposal Routing Form (IPRF) appliance Form, if applicable	
Buo OS:	ns necessary for budget review: get get Justification Indirect Cost Adjustment Form (ICAF), if applicable er correspondence	
<b>Justification</b> : Pleaprior to submission	se state why the necessary paperwork (IPRF, Proposal, etc) was not submitted to the agency.	l to this office
PI OSP No	Dept. Head Dean OSP Grants Specialist	

PLEASE FOLLOW INSTRUCTIONS CAREFULLY ON BACK SIDE OF THIS FORM

### TUSKEGEE UNIVERSITY

No 9315

Tuskegee, Alabama

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NCOME					\$ _	[ 6	1	
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RANSFER OF A  rom  FUND  lease attach appro he budget adjusti pecific explanatio	DEPARTMENT priate expense do ment requested a	OBJECT To cument (prophove is requ	posed expe ired to pe	ense budget wi rmit the effec	th objec	t codes	g of this de	l partment

INSTRUCTIONS: This form is to be prepared in triplicate for each budget adjustment requested. Action by the President will be indicated and a copy of the executed form sent to Sponsored Programs/Department Head. If assistance is needed in preparing this request, contact the Office of Budget and Planning.

WHITE - BUSINESS OFFICE/BUDGET
CANARY - OFFICE OF SPONSORED PROGRAMS
PINK - OFFICE OF GRANTS AND CONTRACTS/ACCOUNTING/UNIVERSITY ADVANCEMENT

#### **Instructions for Budget Adjustment Request (BAR) Forms**

The BAR is the method used for setting up new accounts (expense budgets for new income), increasing budgets (additional income for existing accounts), and transferring funds between University accounts. The forms are prenumbered and may be secured from the Budget and Planning Office.

#### Procedure for completion of BAR

- 1. Enter the date the BAR is initiated.
- 2. Department Name: Name of department or area for which the increase is to be made EX. College of Engineering
- 3. List two-digit fund based on agency or how fund is received.
- 4. List the NACUBO function (how the funds are to used), four digit department id, three digit project id number (leave blank for new project accounts, the Budget Office will assign a number), and revenue object.
- 5. New Appropriations: To be filled out for new accounts (grants awarded, additions to existing grants, gifts, etc. Enter total amount of the funds based on the Notice of Grant Award.
- 6. Income: Show same amount as on New Appropriation line.
- 7. Transfer of Appropriation

<u>From</u>: Indicate fund, department, and object that funds are to be transferred from. If funds are to come from Contingency, type "Contingency".

<u>To:</u> Indicate fund, department, and object that funds are to be transferred to. If more than one object, type total amount and show objects and amounts in space provided or attach proposed expense budget.

8. Space: Give purpose of BAR — to set up new account, to increase existing account or to transfer funds. Proposed budget may be included space permitting. If necessary to attach additional sheets, indicate that in this space.

То:	[Insert PI Name]
From:	Dr. Shaik Jeelani, Vice President for Research & Sponsored Programs
Date:	[Insert date]
Colleague #	t: [Insert GL Account Number]
Agency:	[Insert Funding Source]
Title:	[Insert Title]
Award #:	[Insert Number]
Office of Sp  I AM	d like an extension, please complete the following information and return the signed form to the consored Programs, 4 <sup>th</sup> Floor Carnegie Hall, immediately:  REQUESTING AN EXTENSION FOR THE PERIOD  Please give your reason(s) for the extension request and provident. Use additional sheets if necessary.
Signed:	Date: Principal Investigator
S	haik Jeelani, Vice President Division of Research and Sponsored Programs

### FINAL TECHNICAL REPORT

If you do not wish to extend the award, please submit your final report to the agency by the due date, and forward a copy of it and the letter of transmittal to the Office of Sponsored Programs.

cc:

#### CHECKLIST FOR SUBAWARD/SUBCONTRACT CLOSE-OUTS

Subaward/Subcontract No:	Sub Period of Performance:	_
Subawardee/Subcontractor:		_
Prime Contract No:	Prime GL No:	_
A server Consent DistiGastion	Date Received	
Agency Consent/Notification		
Required Certifications (or clauses incorpor	orated in agreement)	-
• DD Form 254, Security /Immigration		-
• DD Form 882, Inventions & Subcontracts		_
• Form 1018 or 1662 Equipment Inventory		_
Form C-3043 NASA new Technology Sum	nmary Report	-
Copy of Audit Report on File		_
*	ms of the Subcontract. I hereby accept final report, dent may be made. <b>PI must send OSP a copy of the</b>	
PI Signature:	<u></u>	
<ul> <li>Final Payment Processed. All financial obl have been met and paid.</li> <li>Date Closed:</li> </ul>		-
Comments:		_
Closed by:	Date:	

ALL CLOSED SUBAWARDS/SUBCONTRACTS WILL BE FILED BEHIND THE PRIME CONTRACT AFTER CLOSEOUT.

## Cost Sharing and Matching Sources (CSMS) Tuskegee University Office of Sponsored Programs

	Date:
Principal Investigator:	Phone:
Proposed Project Title:	Proposed Dates of Activity:
Funding Agency:	Deadline:

Instructions: Please type or print clearly, and complete all applicable boxes. Use additional sheets if necessary.

		Million III				
Category	Source	Account No.	Use	% of Time/ Use	Value Calculation	Amount of Value (\$)
Tuskegee University Personnel (Name and title)	Basic budget or funded project title and funding agency	Account # and line item	Description of the Contribution made to the Proposed project.		Please indicate how you arrived at the \$ value	
Other Personnel (Name and Employer)						
Consultants (Name and capacity)						
Volunteer Service (Name and/or agency)						

Category	Source	Account No.	Use	% of Use	Value Calculation	Amount of Value (\$)
Supplies	Basic budget or funded project title and funding agency	Acct. # and line item	Description of the contribution made to the proposed project.		Please indicate how you arrived at the \$ value	
Property (Land, buildings, etc.)						
Equipment	Please indicate how, where and when purchased					
Other					2	
Unrecovered Indirect Cost					2	
	-	<u> </u>			TOTAL	
Approvals					<i>x</i> 1	Notes/Comment
Principal Investigator		Business	Business and Fiscal Affairs			
Dean		Provost/A	Provost/Academic Affairs			