FISK UNIVERSITY

ESTABLISHED 1866

Office of Sponsored Research & Programs

Policies and Procedures Manual

2021-22

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1. General Information

The Fisk University Office of Sponsored Programs (OSP) is part of the Office of the Provost and serves as the major unit responsible for the development and promotion of the University's overall program of sponsored programs and sponsored research. OSP implements the established sponsored programs and research priorities, goals and policies as defined in the University's long-range strategic plan. OSP is responsible for assisting all facets of the University with the process of sponsored programs and research. It provides support for research and externally funded programs at the University. All proposals involving sponsored programs and research are reviewed and approved by OSP prior to final submission to the external funding agencies.

Related information concerning applications for research support from federal and state agencies, corporate organizations, foundations, and institutes are available through OSP. This office also oversees all patent and copyright activities through approved technology transfer agents. OSP has the ultimate responsibility for advising the President, faculty and administrative staff on institutional research policies, activities and making recommendations on current and future priorities in research.

2. Mission Statement

The mission of the Office of Sponsored Programs (OSP) at Fisk University is to Serve as an advocate for sponsored research; Advise the administration of matters of regulatory compliance; Assist faculty in finding funding opportunities; Assist faculty with the development of proposals; and Promote internal sponsorship of scholarly activities.

3. Contact Information

The office provides funding information, application guidelines and forms, proposal budgeting, proposal approval, award negotiations, consultation on all fiscal matters related to proposals, and training workshops and seminars.

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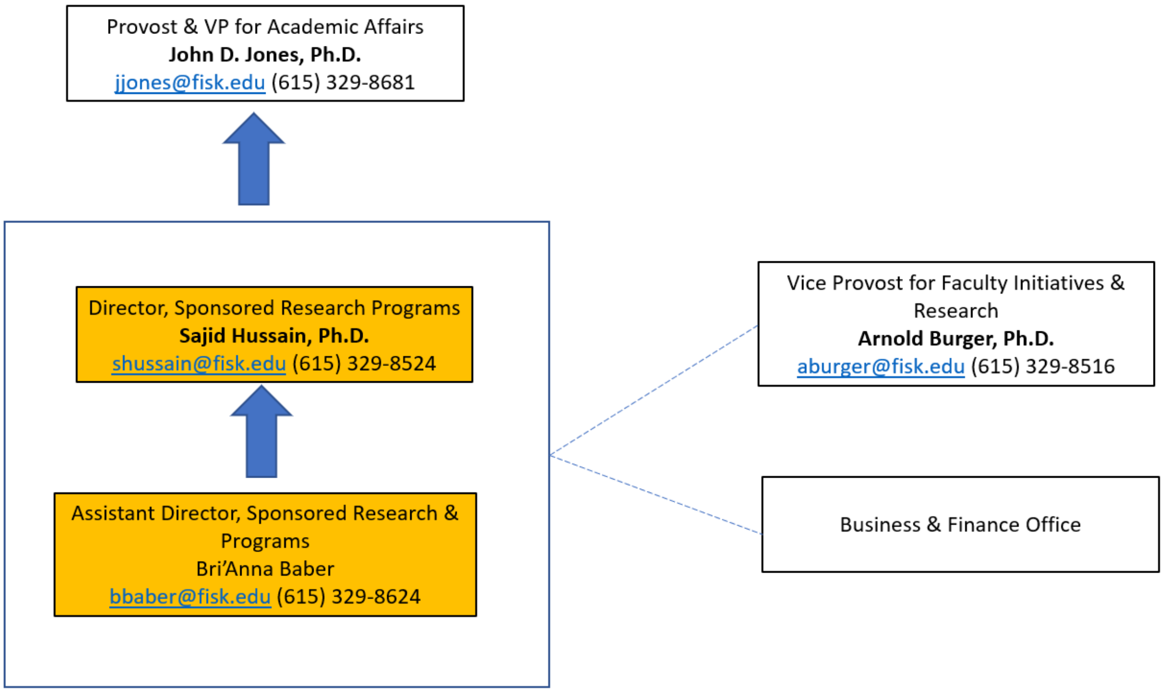
4. Organizational Structure

The Office of Sponsored Programs (OSP) reports directly to the Provost and Vice President for Academic Affairs. The office also works and interacts closely with the Title III Director, office of Vice Provost for Faculty Initiatives & Research, and the office of Business and Finance, on all matters relating to sponsored programs and sponsored research.



5. Outcomes

OSP outcomes are:

- Increase all OSP staff understanding of principles of sponsored project administration;
- Develop a teamwork environment;
- Reduce the administrative burden placed on PI's in applying and administrating contracts and grants;
- Increase the number of proposals submitted per College by 25% each Fiscal Year; and
- Increase the number of awards by 10% per College.

Strategies to achieve Outcomes

The above outcomes will be achieved by the implementation of the below listed strategies:

- OSP will work with faculty/staff in all divisions to write grants.
- Faculty and Staff will attend a proposal building/development workshop to horn their skills in grant writing.
- Update and design the OSP website in a way that it will enhance faculty to write proposals. The website will also feature announcements, OSP newsletter, etc...
- The OSP staff will meet with the faculty and staff to discuss the office's new organizational structure, OSP procedures.
- Workshops will be conducted at least once every semester.
- One on one consultation as deemed necessary and/or when requested.

6. Overview of Services

Services provided to faculty and staff include:

Research Support

Research grants, contracts, or gifts will be accepted only when the proposed research is of benefit to the University, and/or the public in general. The availability of funds must not be the sole justification for undertaking research. The terms of any grant, contract, or gift for research must conform to the usual University policies and business procedures.

Proposal Development

Proposal development is one of the primary objectives, as well as one of the key activities, of the OSP. OSP is available to assist and direct proposal development in the various discipline areas. OSP staff will provide full time proposal development and processing assistance for all sponsored research grant and contract activities funded from extramural sources.

Proposal Review

Each research proposal, upon submittal to an external agency, reflects upon the capabilities and standards of Fisk University. To assure uniform, high quality institutional representation, each proposal must pass a rigorous, multi-step internal review. Signature authorizations of the Principal Investigator, Dean, Department Chair and the University Administrative levels must be secured to complete the review process. OSP staff members are prepared to assist in and complete the proposal review process.

Funding Source References

Several funding source publications are shared through the OSP office, including Grants.Gov, National Science Foundation, National Institutes of Health, Department of Education, etc. Faculty is encouraged to stop by and peruse these resources.

7. Incentives Program

The OSP is in the planning stages of developing a comprehensive awards program to encourage faculty to participate in research. Research incentive awards are designed to promote and reward successful grantsmanship. They include:

- **Principal Investigator (PI) of the Year –** OSP recognizes each year the PI whose award brought in the largest amount of funds.
- **Research Writing Team of the Year**- Along with the PI, OSP recognizes the writing team that assisted the PI with the writing of the proposal that was funded.
- **Project/Program Writing Team of the Year –** Members of the Project writing team will also be recognized.
- **New PIs of the Year –** Faculty, who have written for the first time will be recognized.
- **Researcher of the Year – The** OSP is committed to recognizing researcher for outstanding efforts. A researcher will be recognized at the end of each academic year.
- **OSP End of the Year Recognition Affair -** OSP will honor all PIs at an end of the year. Each PI will receive a certificate.

8. Pre-Proposal Development Activities

Proposal Submission Procedure and Post-Award Activities

Procedures for submitting proposals to state and federal agencies as well as post-award activities are as follows:

All research grant proposals and contract applications must be internally reviewed and approved before leaving the University as an official final-draft submission. In most cases, a signature from the Sr. Vice Provost, Sponsored Programs (OSP) will indicate that a successful internal review of the document has been completed. Approvals will be secured using the Signoff sheet. This two-page form should also be accompanied by a one page abstract and a one-page budget summary.

Pre-Award Activities

1. The Principal Investigator (PI) should submit a "Notice of Intent to submit" form (Appendix A) as soon as he/she decides to develop a proposal. It is important to notify appropriate Chairpersons, Deans, and other supervisory or administrative individuals of proposed research, since these persons need to agree that the proposed activity is consistent with the missions of their respective units. Moreover, they may be called upon to provide space, release time, etc. for the project if funds are granted.
2. Preliminary proposal review(s) should be scheduled with Departmental Supervisors during the proposal development period. PIs should develop their proposals consistent with the specific RFP notification being answered.
3. Be sure to specify the required number of copies to be mailed to the funding agency, the postmark deadline, and please provide a copy of the solicitation with the proposal.
4. In preparing the budget, use appropriate Fringe Benefits (currently 28% of Salaried Personnel) and Indirect Cost rates (see Appendix B - General Information: Negotiated Indirect Cost Rates -- percentage to be applied to Direct Cost Total).
5. Allow **Five Working Days (minimum)** to process and mail proposal applications. **Allow Extra Time for Proposals Specifying Special Conditions** (e.g., use of Human Subjects, Laboratory Animals, Hazardous and/or Radioactive Materials, etc.). Proposals must be reviewed to assure that they conform to academic, financial, research conduct, personnel, animal welfare, hazardous materials/waste handling, and human subject health/safety restrictions and guidelines imposed on and by the University. Even under normal circumstances (with no special conditions), completing the review takes time and is often subject to the availability of responsible individuals (reviewers). Every effort will be made to accommodate all proposal submissions in meeting the deadline. However, every proposal submission is not an emergency! PIs are requested to plan their proposal development accordingly.

9. Proposal Development

Request for Proposals (RFP)

A good proposal, whether it is research, training, or curricular development, requires time. Oftentimes one is forced to speed up proposal development because of impending deadlines, but many times one knows far enough in advance to make adequate plans. Many granting agencies have more than one deadline; it may be more profitable to miss a deadline rather than submitting an application that is not very well prepared. Writing a concept paper is one way of helping one plan, organize, think through, and refine ideas into fundable proposals.

Concept Paper

Proposal writing requires organization of thought, clear communication, and a logical sequence of ideas. Under the pressure of meeting a deadline it is especially difficult to produce a coherent, precise, and concise application which represents one's work in the most favorable manner possible. The concept paper is a brief sketch of a project idea, which serves as an advance organizer for the full proposal and provides a medium to assess the idea in several contexts. This brief paper of 2-4 pages helps applicants organize, think through, and refine their idea so that it can be shaped into a fundable proposal. Once written, concept papers can be used in a variety of ways: 1) obtain feedback from colleagues; 2) identify resources needed; 3) bring collaborators on board; 4) determine boilerplate which will be needed; 5) identify potential sponsors; and 6) pre-proposal contact with sponsor.

Proposal Components

Each application should be developed in accordance with specific program instructions. The text should be organized to meet the evaluation criteria published in the guidelines. Although the narrative outline should follow program specific guidelines, there are components which are common to all proposals and the following should be recognized as the basic framework for translating an idea to a well OSP form:

Cover Page

Contains information about the legal applicant and the proposal: the principal investigator, the title of the project, the agency to which the application is being submitted, the date submitted, duration of the project, contact persons for questions or negotiation; institutional approvals; and amount requested (see Appendix B).

The title deserves special attention. It carries the image of the project. Since it is entered, scanned, and indexed in information systems, it should be precise and telling. Keep it short, but appropriately descriptive.

Abstract

A page which summarizes the key features of the proposal. It should include a statement of the objective, methods, and significance condensed to a page or less. The main points of the text should be covered; it should be informative to others and understandable to a lay person.

The reviewers usually read the abstract first to gain a perspective on the study; use it later to remind themselves of the nature of the study when the project comes up for discussion; it may be the basis for assignment by the sponsor to a specific review group.

Problem Statement/Needs Assessment

Define the problem in specific and realistic terms. Don't let them be too grandiose or too trivial. Why has this problem been chosen for study? What are the causes of the problem? Why does the study need to be conducted? Provide documentation and relevant, though carefully selected, statistics. State why the sponsor favors this project over all other applications.

Literature Review/Bibliography

The problem statement and need for the study, as well as the methodology, will have their foundation in the literature.

For example, what is known about the area of inquiry; how does the study relate to what is known; why has the approach to the problem been selected? Citations should be analytical, highlighting the essence of an author's work and describing strengths, weakness, comparisons, and points of departure. It is important to demonstrate your familiarity with the field. Any pertinent reference that is overlooked may be one that the reviewer expected to see cited. The bibliographic selection will reflect the author's scholarship and credibility.

If there is no literature bearing on the problem, indicate what sources were consulted; also offer reasons why there is a vacuum. Cite those works, which come closest to the problem and explain why they fall short. If the literature is overwhelming, select only those sources, which bear directly on the problem.

This part of the proposal is not usually a discrete section. Usually, it is worked into the flow of the entire narrative so that it provides a conceptual framework. Two points should be kept in mind. First, the proposal can't be written and then the literature search done. Second, the reviewers will probably be some of the leading authorities in the field and will be looking for references; demonstrating your knowledge and understanding of the state-of-the-art is critical. Do not overlook the National Information Technical Service and similar sources. All citations in the text should be compiled in a Selected Bibliography.

Objectives/Questions/Hypotheses

These are precise, measurable statements of the expected outcome of the project. They can be phrased as objectives, or questions to be answered or hypotheses to be tested. They present the terms of the study by establishing its parameters.

Carefully selected, they create the specific focus for a manageable project; expressed in epic statements they propose a project, which attempts to do more than it could hope to realize.

If they are too narrow, the study may appear to be trivial. Striking a balance keeps the project realistic and manageable. Number and list them so that anyone reading the proposal knows exactly what you seek to achieve. Ask yourself if the objectives lend themselves to operational definitions and if the hypotheses and questions are testable. If they do not, redefine them until they do.

Preliminary Work

Often, especially in the case of highly competitive grants and contracts, there will be a request for information related to introductory and prerequisite research or studies performed prior to the proposed project. It is useful therefore and to the researcher’s advantage to include a proposal section summarizing experimentation or studies that have been completed in preparation for the primary investigation being proposed. Funding organizations want some assurance that their research dollars are being put to the best possible use, and also want to learn what has led the investigator to formulate his or her present set of objectives. In many such cases, it may be next to impossible for the researcher to qualify for funding without the inclusion of some well-organized preliminary work.

Methodology/Design

This section gives evidence of your ability to plan and conduct the study. What activities are proposed to carry out the objectives, to test the questions and hypotheses? What is the rationale for the approach?

The procedures should be carefully detailed. In a research proposal, discussion of the methodology should include what data will be collected, accessibility of data, who will collect it and how, how the data will be analyzed, sampling procedure, controls, and subjects. Justify where necessary the appropriateness of the study design and research methods. Address sample size and selection and application of statistical methodologies.

If you are going to develop curriculum, explain existing sources to be used and why selected, what form it will take, content, field testing, how it will be used, who will use it, and how it will be made available to users.

A training program should explain what material will be used, who the participants will be, how many, how they will be selected, where the training will take place, how long, and who the trainers will be. Let the reader know you have developed a complete plan of action.

Evaluation

Carefully consider if an explicit evaluation plan should be included in your proposal and decide what factors will have to be assessed. Consult an evaluation specialist if you have no training or background in evaluation methodology. Clarify for the reviewer who will conduct evaluation, their qualifications to do so, and their plan for doing it. This may be a service provided by an outside consultant, someone on campus, or an organization set up for such purposes.

Results/Significance

Be sure you have clearly in mind what contribution the study will make. Can the process or the outcomes be duplicated, adapted, or generalized? What accomplishment can the agency take to Congress to support budget requests? Either as an advancement of fundamental knowledge or as an instrument of applied science, the impact of the study must be made clear. Will the results have local, regional, or national significance? What difference will your project make (the eternal before and after question)?

Dissemination

The results of any study must be made available to potential users for application or replication. How will you do it? Dissemination vehicles include presentation at a professional meeting, publication of an article, holding a conference, and utilizing any existing networks. Plans for this effort should be discussed when an agency considers this activity a criterion of evaluation.

Management Plan

Identify key staff members, including yourself, highlight their backgrounds, and comment on the special contribution their expertise will enable them to make. Describe their specific responsibilities and show their relationships in an organizational chart. If other departments, institutions, or organizations will be participating in the project, discuss their input and what the lines of communication will be.

If consultants or an advisory board will be used, identify people or at least describe the backgrounds and capabilities, which you will seek. Explain the role, exactly what they do and when as well as why they are needed. Try to contact individuals before the proposal goes in to get their agreement to participate.

Let the reader know you understand your own limitations and weak areas as well as your strengths. Provide an activity chart, which lists tasks across the project time period. This can range from a simple bar chart to a critical path chart. The ordering of events, dates for completion, and staff responsibilities for implementation in a diagram help the reader visualize and summarize the work plan.

Other Components

General university facilities or special features should be narrated. Equipment, systems, administration, resources - all should be highlighted as appropriate. While much of it can be boilerplate for any proposal you write, it should be adapted for each application to call attention to those support systems, which have special relevance to the proposed project. Curricula vitae for all key staff members and consultants are integral to the application.

Letters of support and endorsement help (and may be necessary) to demonstrate evidence of cooperation from participating organizations or individuals. Access to subjects, sites, and data collections must be made clear.

Budget Consideration

Proposal Budgets must be carefully prepared, with attention given to details. They must not be exorbitant, but realistic in terms of reaching proposed goals.

The basic steps in budgeting a proposal are as follows:

- Specify the start and end dates of the project budget period.
- Decide which budget line items are required by the project.
- Price the items.
- Justify budgetary requests, in narrative form, where needed.
- Seek written approval from university administrators before submitting budget to sponsors.

Personnel

Academic Personnel

1. Research Vice s
2. Research Assistants
3. Graduate Students
4. Interviewers
5. Computer Programmer
6. Evaluators
7. Proposals for continuing year
8. Secretaries
9. Editorial Assistants
10. Technicians
11. Hourly Personnel
12. Release Time
13. Salary increases

Fringe Benefits

Fringe Benefits are (@ 28%) of salaries & wages of faculty & staff)

Consultant Services

1. Consultant fee
2. Travel
3. Subsistence
4. Supplies for consultant

Subcontracts

Computer costs

1. On-line time
2. Job runs
3. Data storage
4. Computer software
5. Computer use

Equipment

1. Fixed equipment
2. Movable equipment
3. Office equipment
4. Equipment installation

Materials and Supplies

1. Office supplies
2. Communications
3. Test materials
4. Questionnaire forms
5. Duplicating materials
6. Animals
7. Animal food
8. Laboratory supplies
9. Glassware
10. Chemicals
11. Electronic supplies

12. Report materials & supplies
13. Miscellaneous
14. Periodicals & books
15. Instructional material

Travel

1. Administrative
2. Field work
3. Professional meetings
4. Travel for consultation
5. Aircraft rental
6. Foreign travel
7. Mileage
8. Air transportation
9. Registration fees
10. Auto rental/taxi/bus/metro/train
11. Per Diem
12. Hotel

Alterations and Renovations

Other Expenses

1. Duplication services (Reports, etc.)
2. Printing
3. Publication costs
4. Photographic/graphic services
5. Service contracts
6. Space rental
7. Page charges
8. Equipment maintenance & repair Equipment rental
9. Human Subjects payment
10. Workshops
11. Telephone (line charges; long distance & tolls)
12. Postage

13. Interviewers' fees
14. Honoraria

Indirect Costs

Cost Sharing (if required)

Trainee Costs

1. Stipends
2. Dependency allowance
3. Trainee travel
4. Tuition & fees
5. Training supplies

10. Post-Award Activities

Upon receipt of an award, usually in the form of an award letter, an account having an assigned name and number must be set up in the Division of Finance so that proper expenditures can be made. A budget request form Office of Sponsored Programs (OSP) will initiate this process. No financial obligations are to be made on a grant without the award letter and the appropriate account established. Copies of progress and/or final reports are to be filed in the OSP. It is the Principal Investigator's responsibility to provide these reports in a timely manner in order to meet the agency deadline. Some funding agencies grant "no cost" extensions for funds not obligated at the end of a grant period. Specific guidelines for the agency must be checked. Usually there is a time frame in which such a request must be made.

Human Subjects, Laboratory Animals, Recombinant DNA, Hazardous Materials and Radioisotopes

If a proposal is to involve any of the items listed above, there are procedures to follow and approvals to be obtained. The OSP can assist with information on these. Persons should check on these items early in the proposal development because they all require committee approval.

Policy on Indirect Cost

Indirect cost is money provided to institutions to cover overhead cost for supporting grant operations. It costs money for a grant to operate on a campus, and indirect cost belongs to the institution to help defray these costs. These monies cannot be used to increase salaries.

Employment and Compensation on Research and Sponsored Program Activities

A portion of a faculty's salary, consistent with time and effort on the project, can be charged to a grant. The total distribution of one's time cannot exceed 100%. Additionally, grant funds cannot be used to increase one's base salary. Nine-month persons can be compensated during the summer months consistent with Fisk University's policy on summer employment. *All employees who participate in sponsored programs must record time and effort as it relates to his/her specific federal project. Quarterly time & effort forms must be provided to Grants and Contracts with all required signatures.*

Federal and State Grant Expenditures

All expenditures exceeding $5,000 (or $1,500 when desired expenditures are not budgeted in the original proposal), including the employment of personnel, on federal and state grants must be cleared through the OSP.

Transfer of Principal Investigator to another Institution

If the principal investigator transfers from Fisk University to another institution, the grant, because it is awarded to Fisk University and not to the individual investigator, remains with the University, unless in petitioning to the Vice Provost, Office of Sponsored Programs (OSP), it is released. All equipment purchased with grant funds also remains with Fisk University unless the P.I. requests, in writing, and is granted permission from the Vice Provost, and office of Sponsored Programs (OSP). The granting agency must also approve the proposed change of institution.

11. Purchasing and Accounting

Once an award is made, there are some logistics that must either be in place or put in place to increase the chances that proposal objectives are met and that policies and procedures of the granting agency as well as those of the university are followed.

Requisition

Requisitions are made routinely with the appropriate account name and number (accounts are set up for funded projects in the Division of Finance.

Purchase Order

The Purchase Order (PO) is the official document authorizing the purchase of requested items. POs are issued from the Chief Purchasing Officer in the Purchasing Department.

Grants

A grant is an award of funds to an individual or an institution for a specific period of time to engage in certain activities. Grants have minimum restriction and the person in charge, the principal investigator, has a fair degree of flexibility within certain parameters as to the proposed activities.

Contracts

A contract is like a grant, but generally is much more restrictive. Usually, the terms in a contract are set forth in writing so as to be enforceable by law.

12. Compliance

The federal government mandates that Fisk University (LU) have the ultimate responsibility to ensure that any research conducted on or off campus, including collaborative research with other institutions, is conducted in compliance with University, local, state, federal and funding agency regulations. It is also the responsibility of the institution to ensure that the rights and welfare of human subjects, the welfare of animals, the rights of the investigator, the environment and the community are protected.

Policies and Procedures

The following procedures and regulations govern all research at the University, whether externally or internally funded. Depending on the research topic and conditions necessary for successful project implementation and completion, special circumstances may be encountered which require extra measures of precaution. Adhering to the appropriate procedures will ensure that the University policies specifically pertaining to the situations as well as the minimal federal, state and local laws and regulations are met. Included are: Human Subjects in Research; Animal Subjects in Research; Biohazards; Hazardous Waste; and Patent and Copyright Policies of the University. Also included is a summary of the NIH Policy on Scientific Misconduct.

13. Publications Policy

The University will not enter into any agreement with a research sponsor that restricts the faculty or staff's right to publish the results of that research, with the following exceptions:

1. Upon request, the University can agree not to disclose or publish without the sponsor's approval any sponsor-furnished information, nor reveal to others specific applications of the research results or operations of the sponsor.
2. Upon request, the University can agree to provide the sponsor a copy of any report or manuscript containing the results of research at first availability and prior to publication.
3. Upon request, the University can agree to delay publication of information concerning an invention for a period of no longer than twelve months from the date of submission of the manuscript by the principal investigator to the sponsor, or until a U.S. patent application has been filed, whichever represents the shorter interval of time. With governmental sponsors, publication may be delayed indefinitely for reasons of public policy. Any sponsor may waive a previously agreed-upon delay period, thus permitting immediate publication. The submission and cataloging of any thesis or dissertation prepared by a graduate student in fulfillment of an academic requirement is exempt from any delay or review by the sponsor.

14. Intellectual Property

During the agreed-upon term of sponsored research, it might be necessary or desirable for a sponsor to entrust to Fisk University certain materials business or technical information, or data in confidence during the term of sponsored research and for a reasonable period of time beyond such term. Please refer to https://www.fisk.edu/assets/files/sz/fisk-universityemployeehandbook-11.14.17.pdf, page 100-109

15. Human Subjects in Research

To establish local institutional policies and procedures for implementation of federal policy safeguarding the rights and welfare of humans involved as subjects in experimental projects and research.

The Vice Provost, and Office of Sponsored Programs (OSP) is the University official responsible for safeguarding the rights and welfare of human subjects involved in research activities. This responsibility has been delegated to the Institutional Review Board (IRB) Committee. Any project originating at Fisk University which uses human subjects, including self-experimentation, is subject to review and approval by the Human Subjects Committee. This review shall determine that:

- The rights and welfare of the subjects involved are adequately protected.
- The risks to an individual - physical, psychological, or social - as a result of any activity which exceeds the application of accepted routines necessary to meet his needs are outweighed by potential benefits to society.
- Legal informed consent is obtained by appropriate and adequate methods. Approval must be obtained <u>before</u> <u>the</u> <u>project</u> <u>is</u> <u>initiated</u>.

All projects involving human subjects and requesting funds from external sources should have approval of the Institutional Review Board prior to submission to the agency, or the protocol must be submitted to the Committee concurrently with submission to the agency. If the project is to be carried out at a facility not Vice d with Fisk University, the principal Investigator is obligated to follow that organization's guidelines as well. This procedure applies to all activities involving human subjects conducted by Fisk University personnel regardless of the source of support.

The determination of the risk-to-benefit ratio is primarily the application of common sense and sound professional judgment to the proposed activity. Questions concerning what constitutes risk should be addressed to the Chairman/Co Chairman of the Institutional Review Board during the planning stages of the proposal.

<u>IRB Committee</u>

This committee's purpose is to establish and maintain policies and procedures for the implementation of federal policy safeguarding the rights and welfare of humans involved in experimental projects and research.

<u>Procedures:</u>

- Principal investigators submitting proposals involving the use of human subjects must check Item *D. Human Subjects* in the *Project Requirements* section of the *Proposal Review and Certification Form*.
- Agency requirements for human subject's assurance certification vary: check with the Office of Office of Sponsored Programs (OSP) for more precise information.
- Principal investigators must allow sufficient time for review and approval of the Human Subjects Committee in the proposal submission and internal review/approval process. Clearance is indicated by the appearance of the signature of the Human Subjects Committee Chairman on one of the line provided for *Other Signatures as Necessary* on the *Proposal Review and Certification Form*.

- The Office of Sponsored Programs (OSP) will refer all proposals for research activity involving biohazards to the University Biohazards Safety Committee for review and approval. Principal investigators are encouraged to consult with this committee early in the proposal development process to identify and resolve potential problems and questions concerning biohazard handling and use.
- Principal investigators should allow ample time for review and approval of the Biohazards Safety Committee in the proposal submission and internal review/approval process. A signature by the Biohazards Safety Committee Chairman in the *Other Signatures as Necessary* section of the *Proposal Review and Certification Form* may be required before further processing can be completed.

16. Copyright Policy

It is not the intent of Fisk University to infringe upon the rights of faculty, staff, and students to write or otherwise generate on their own original copyrightable materials for which they have sole rights of ownership and disposition.

The University does, however, claim property rights to copyrightable materials when it provides the facilities, salaries, or other support for the express purpose of creating such materials. Included are such items as books, pamphlets, or other printed matter; film, videotape and audio recordings; computer programs or computer-based instructional materials; or any other items covered by the Federal Copyright Act now existent or as later amended.

The University faculty, staff, and student body are encouraged to contact the Office of Office of Sponsored Programs (OSP) for sources of information or technical advice for questions concerning protection of their individual rights to materials they have generated or questions involving the use of currently copyrighted materials in their work as teachers, scholars, and creators of their own copyrightable materials.

17. Subcontracting

When it is anticipated that a portion of the work to be performed under a grant or contract is to be subcontracted to an outside organization, the Principal Investigator should first contact the of Office of Sponsored Programs (OSP) to make known the requirements of the subcontract. The PI must make no advance commitments, implied or otherwise, to potential subcontractors regarding the award of subcontract work. Some of the requirements that must be coordinated between the PI and Office of Office of Sponsored Programs (OSP) are listed here:

- Prepare the "Statement of Work" and "Schedule of Payments" to be included in the subcontract;
- Develop a list of potential bidders (if it is necessary to consider only a single source, an explanation of the reason should be provided);
- Prepare and submit "Request for Proposal";
- Evaluate bids received and determine the successful bidder;
- Obtain sponsor approval prior to awarding of subcontract work;

- Determine that adequate funds are available to cover the subcontract work;
- Ensure that University and sponsor requirements are met if human subjects are involved;
- Establish procedures for administering the work performed under the subcontract.

When it is known during the proposal preparation stage that subcontracting will be required, a subcontract should be prepared at that time and included in the proposal submitted. Attention to such details in the proposal stage should save time and permit smoother initiation of the project upon receipt of the award.

For a more thorough discussion of subcontracting, both with private sources of funding and with federal governmental sources, see section *O. Subcontracting Practices and Procedures.*

18. Conflict of Interest

Fisk University faculty is made up of highly trained professionals, many of them of national and international reputation, representing a significant reservoir of human resources. Services of this group are available to the various sectors of society for the mutual benefit of government, industry, the academic community and society at large. Outside employment and activities are encouraged, provided they do not detract from full and competent performance of a faculty member's duties and responsibilities.

The information presented below concerning conflict of interest has been adapted from the Joint Statement of the Council of the American Association of University Professors and the American Council on Education, December 1964, and is intended for the guidance of University faculty members engaged in research.

Outside Interests

- When a university faculty member undertaking or engaging in a program has a significant financial interest in, or a consulting arrangement with a private business concern, it is important to avoid actual or apparent conflicts of interest between University obligations and outside interests and other obligations. Situations in or from which conflicts of interest might arise are the following:
- Orienting University activities to serve the needs of private firms without disclosing such orientation to the University and to the sponsoring agency.
- Purchasing major equipment, instruments, materials, or other items for a sponsored program from the private firm in which the faculty member has an interest without disclosing such interest.
- Transmitting to the private firm or using for personal gain work products, results, material, or information from sponsored programs that are not made generally available to others (this includes licensing arrangements for inventions or consulting on the basis of sponsored research results).
- Use for personal gain or other unauthorized use of privileged information acquired in connection with the faculty member's sponsored activities (the term "privileged information" includes, but is not limited to, medical, personnel, or security of individuals, or knowledge of forthcoming programs).

- Negotiation or influence on the negotiation of contracts, related to the faculty member's sponsored program, between the University and organizations with which he/she has consulting or other significant relationships.

- Acceptance of gratuities or special favors from organizations with which the University does or may conduct business in connection with a sponsored project, or extension of gratuities or special favors to employees of the sponsoring organization, under circumstances that might reasonably be interpreted as an attempt to influence the recipients in the conduct of their duties.

Other Potential Conflicts of Interest

When the principal investigator consults for one or more organizations in the same technical field as the sponsored program, care must be taken to avoid giving advice that may be of questionable objectivity because of possible bearing on the faculty member's other interest. In undertaking and performing consulting services, full disclosure of such interests should be made to the University and to the sponsor insofar as they may appear to relate to the work at the University or for the sponsor. Conflict of interest problems could arise, for example, in the participation of a faculty member of the University in an evaluation for the sponsor on some technical aspect of the work of another organization with which the faculty member has or had a significant consulting or employment relationship or a significant financial interest, or in an evaluation of a competitor to such other organization.

19. Debarment and Suspension

Certification regarding debarment, suspension, and other responsibility matters is required by the regulations implementing Executive order 12549, Debarment and Suspension, 34 CFR Part 85, Section 85.510. The prospective applicant certifies to the best of his knowledge and belief that its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency; have not been convicted of or had a civil judgment rendered against them for fraud or a criminal offense in connection with obtaining or performing a public transaction; are not presently indicted for or otherwise criminally or civilly charged by a government entity; and have not had one or more public transactions terminated for cause or default within a three-year period preceding the application/proposal. Form GCS-008, 6/88 is used to certify all of the statements in this Executive order. This is a pre-award requirement.

20. Health and Safety

Fisk University is committed to provide a safe and healthy environment for its employees and students. The University assures that regulations pertaining to compliance requirements for health and safety standards in the workplace are enforced, including compliance with Occupational Safety and Health Association (OSHA) regulations. A Research Safety Committee ensures that the University is protected from toxic and nuisance substances, flammable materials, and fire. In addition, this committee ensures that all sources of ionizing radiation (including biohazard radiation and radioactive materials) at the University are used safely and, in a manner, which complies with applicable Federal and State regulations. The Research Safety Committee is appointed by and reports to the Vice Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP).

21. Programmatic Compliance/Technical Reports

Federal sponsoring and other grant agencies require specific information about program performance. Grant proposal guidelines usually inform the project director of reporting requirements. The PI/PD is responsible for managing the day-to-day operations of grant and sponsored activities and must monitor project activities to ensure compliance with applicable agency requirements and that performance goals are being achieved.

Performance reports shall normally contain brief information on the following:

- A comparison of actual accomplishments with the objectives established in the proposal;
- An explanation for not meeting established objectives;
- Analysis and explanation for cost overruns;
- Other applicable information required by the sponsoring agency.

The sponsoring agency should be notified of developments, which may have significant impact on the grant or sponsored activity. Specifically, the agency should be notified of:

- Problems or delays which may impair the ability to meet the proposed objectives;
- Favorable developments which will permit the PI/PD to meet objectives sooner than scheduled or at less cost than anticipated.

All project directors are asked to inform the Office of Office of Sponsored Programs (OSP) of all compliance requirements mandated by the agency at the time of receiving the award. In addition, project directors are encouraged to present a file copy for OSP records of all reports to sponsoring agencies.

22. Consultant Payments

Compensation for those persons who are not filling an established position and are being paid on a one-time basis when work is completed is termed consultant payment. Payment

for consulting must be supported by a written agreement signed by the consultant and by an authorized project representative. The agreement must include a detailed statement as to the duties and responsibilities of the consultant.

Overload Payments from Grants for University Personnel

Faculty employed at Fisk University and paid with federal grant funds are not considered federal employees, but Fisk University employees; therefore, the use of project funds for the payment of fees for additional pay (from within the grantee organization) is allowable under the conditions indicated below:

1. There must be evidence that the services to be provided are essential and cannot be provided by persons receiving salary support under the grant.
2. There must be evidence that a selection process has been employed to secure the most qualified person available and that the selection has been approved by a senior officer of the University.
3. There must be evidence that the charge is appropriate considering the qualifications of the employee, his/her normal charges, and the nature of the service rendered.
4. If overload payment is sought for an employee of the University, the service must be across departmental lines and in addition to regular duties, or it must involve a separate or remote operation, and the work performed be in addition to the employee's regular workload and specifically approved in writing by the sponsoring agency.

23. Stipends

Stipends are payment to individuals, fellows, or trainees under fellowships or training grants. Such payments are intended to provide for the individual's living expenses during the period of training.

Student stipends cannot be charged to sponsored projects unless they are specifically provided for in a written authorization from the sponsor. Students receiving stipends are not eligible for fringe benefits.

24. Impact of Release Time on Cost Sharing

All personnel working on sponsored projects may be relieved of their regular duties by the department head or other responsible persons for that period and percentage of effort to be devoted to the sponsored project. If such personnel continue to be paid from departmental funds while working on a sponsored project, then that portion of their salary and fringe benefits related to the sponsored project effort represents cost-sharing to the project. Alternatively, if regular personnel are appointed to and paid from the sponsored project budgetary account on which they work, then departmental (University) budget money will be released. These State funds can then be used for other purposes within the University (subject to the approval of the department head and dean and in conformity with University policy. The principal investigator may request of the department head and/or dean to use these State funds for project related costs.

25. Expenditure of Project Funds

The Purchasing Department is responsible for obtaining all goods and services from outside the University. The responsibility of the Purchasing Department encompasses the obligation to obtain quality merchandise/service by the date required at the lowest possible cost to the University. Procurement of goods and services from sources outside the University by individuals or entities other than the Purchasing Department is not authorized. The Purchasing Department may determine the selection of the vendor from whom the merchandise or service will be ordered. The specifications or model requested by the principal investigator will not be changed without prior approval.

A Requisition Form is used to procure goods or services from external vendors, as well as for various on-campus services. All requisitions for purchases over the amount of $1,000 should be forwarded to the Purchasing via the Office of Office of Sponsored Programs (OSP) which will verify the allowability of the item(s) requested.

26. Travel Reimbursement

Travelers on sponsored projects are subject to the same rules and regulations as are travelers on other budgets. Hence, travelers should become familiar with the existent University travel procedures.

27. Budget Transfers

If a budget change is required on an on-going contract or grant, a Request for Transfer of Funds Form is necessary. Upon submission, a review of the project will be made by an Administrator within the of Office of Sponsored Programs (OSP) determine whether agency approval is required.

Prior approval is normally required for the following:

1. Subcontracts or subgrants
2. Changes in scope or objectives
3. Changes in key personnel
4. Transferring substantive programmatic work to a third party
5. Medical care to individuals under research grants
6. General purpose equipment
7. Large transfers of monies from one category to another
8. Foreign travel

Items that are NOT allowed on contracts and grants are:

1. Contingency funds
2. Entertainment costs
3. Fundraising, solicitation of gifts
4. Losses on other research agreements or contracts
5. Lobbying

28. Final Reports

The OSP will send notification to the P.I. 90 days before expiration of the grant as a reminder of closeout procedures. A copy of this notification is also forwarded to the dean/director, Human Resources, Property Management, and Comptroller's Office. To ensure that the University receives its final payment and that sponsor requirements are met, the following procedures should be followed:

Final Report of Expenditures

The Grants and Contracts Accountant in the Office of the Comptroller is responsible for compiling the Final Report of Expenditures and sending a copy to the principal investigator.

Technical Reports

It is the responsibility of the Principal Investigator to ensure that all technical and other reports (e.g., invention reports and property and classified reports) are delivered in a timely manner and in the format agreed upon with the sponsor.

Final Report

The final report required by the funding agency should be completed and submitted and copies forwarded to the deans/director's office and Office of Office of Sponsored Programs (OSP).

Project Close-out Checklist

- Office of Human Resources notified of university supporting personnel position terminations
- Complete Personnel Action Forms to terminate these employees
- Use remaining vacation leave
- Telecommunications notified to stop telephone service
- Dean's/director's office notified of furniture and equipment to be transferred
- Return of leased equipment arranged
- Mailroom notified of forwarding address
- Keys returned
- Files reviewed and stored
- Budget closed-out
- Final report submitted to funding agency with copies to dean/director and OSP.

29. Subcontracting Practices and Procedures

What Is a Subcontract?

A subcontract may be defined as "an ***agreement*** written under the ***authority of*** and ***consistent with*** the terms of the Prime Award (grant or contract) that ***transfers a portion of the research or substantive effort*** to another organization."[1] This definition contains four critical phrases, (as italicized):

Agreement

A subcontract is a formal, legal contractual instrument. The term *subcontract* is more correct than the often-used terms *subgrant* and *subagreement.* While it may seem logical to refer to a lower tier relationship from grant funds as a subgrant, the bilateral agreement which is executed is a contract.

Authority of

Prior to transferring any substantive effort to another institution, approval of the sponsor is usually required. Awards from private sources may not be clear about the assignment of work to another party; sound practice, however, dictates that the sponsor be consulted beforehand. Otherwise, costs Vice d with a subcontract which did not have prior approval may not be considered as allowable costs under the prime award.

Consistent with

An effective subcontract will establish the critical parameters of the relationship and will set out the rights and responsibilities of each party, but in particular will require that the subcontractor conduct the project in accordance with the terms and conditions of the prime award by transferring or *flowing down* to the subcontractor the relevant terms of the prime award. Only in this way can the prime awardee exercise the prudent stewardship necessary to ensure fulfillment of its responsibilities under the prime award.

Transfers a portion of the research or substantive effort

In instances when another organization will be responsible for performing a portion of the substantive work for which the prime award was made, a subcontractual relationship should be established. Thus defined, a subcontract does not refer to the purchase of goods, equipment or services, which can be handled properly by consulting agreements or purchase orders.

The recipient of a subcontract is referred to as a ***subcontractor***. Terms such as "subgrantee" and "subrecipient institution" are also used.

Submission of a Subcontractual Proposal

A proposal to act as a subcontractor is as formal an offer as one submitted to a sponsor and should be treated in essentially the same manner. Therefore, WHEN PROPOSING TO ACT AS A SUBCONTRACTOR, THE INSTITUTION SHOULD REVIEW AND APPROVE THE PROPOSED STATEMENT of work, budget and budget justification, and any required materials prior to their submission to the prime. In addition, any internal approvals or required forms should be routed to the pre-award or sponsored projects office (i.e., Office of Sponsored Programs (OSP)). Upon successful review of the proposed materials, the proposed subcontracting institution may either endorse a cover sheet or preferably transmit these materials under a cover of transmittal letter. This letter can function in three ways: it indicates institutional approval of the subcontract proposal; it verifies the indirect costs, fringe benefit rates, and type and level of institutional cost-sharing, if any; and it indicates that institution's willingness to administer a future subcontract.

Responsibilities of Prime Awardee

The institution which will function as the prime awardee has a responsibility to review the subcontract materials, as well as the full proposal to be submitted to the sponsor. The proposed prime awardee should ensure that the subcontracting institution has reviewed and approved the submitted subcontracting materials and that appropriate materials, especially budget information, have been properly incorporated into the proposal. Much of the subcontractor's materials serve as back-up information for the proposed prime awardee and is not necessarily incorporated verbatim in the proposal; this is particularly true of the subcontract statement of work and institutional letter. Items to consider include the following. Does each institution, for example, know what its respective role would be? Does the proposal clearly articulate that a subcontractual relationship will be developed? Is the budget adequate to the proposed work? Has someone authorized to sign on behalf of the subcontracting organization endorsed the subcontract proposal?

When these and other issues are adequately resolved, the proposed prime awardee submits the proposal for consideration by the sponsor. Except to respond to possible requests for additional information, or to generate revised budgets, the proposed prime and the subcontracting institution usually have little further contact until an award is received, at which time they will negotiate a subcontract. Occasionally, however, it is prudent or necessary to establish a teaming agreement or memorandum of agreement at this stage to spell out the future relationship, as well as to define the relationship during the interim period (i.e., maintaining confidentiality during the review period.)

To ensure that the subcontract is drafted and negotiated when the overall proposal is funded, it is an excellent idea to establish a tickler or coding system. Such a system could be a simple tag or colored mark on the proposed file, or it could be a computerized database tied to the proposal information. Whatever the system, its goal is to facilitate the timely issuance of subcontracts.

Drafting and Negotiating Subcontracts

Securing Sponsor Approval

Before a subcontract is drafted, the approval of the sponsor should be secured. Prior approval is a clear concept in governmental subcontracting, but often less clearly articulated with private sources. However, the basic concept of prior approval is a sound one; without prior approval to subcontract, the sponsor has no responsibility to allow subcontract costs. Prior approval protects the interests of the prime awardee. In most circumstances, a proposal and budget submitted to the sponsor would indicate the anticipated collaborative relationship, specifying the collaborating institution, the key personnel and how much of the prime award would be subcontracted. An award based upon such a proposal and budget would generally constitute prior approval. If the need to subcontract a substantive portion of the work is not indicated in the proposal, it is prudent to secure the sponsor's permission before entering a subcontractual relationship even if the prime award lacks an Assignment clause.

Rights and Responsibilities of Each Party

An effective subcontract should clearly establish the rights and responsibilities of each party. By transferring or "flowing down" relevant provisions of the prime award (suitably modified), a subcontract ensures that the prime awardee can fulfill is responsibilities toward the sponsor. The subcontract should also reflect the policies and needs of the prime awardee institution, as well as those of the subcontractor. It should enable the prime awardee to exercise necessary and reasonable oversight. A subcontract may be more restrictive than the prime award, but not less so. However, in drafting and negotiating a subcontract, the prime awardee should remember that it is often dealing with a colleague organization and that the role of prime awardee and subcontractor may one day be reversed. A subcontract should serve to protect the prime awardee which is solely liable and accountable to the sponsor for the conduct of the entire project and for compliance with all the prime award requirements. Finally, as a bilateral contract, the subcontract should comply with standard contract practice and law.

Standard Subcontract Clauses Include:

The goals and purposes of 16 basic subcontract elements are discussed below. These discussions are augmented by the sidebars, which provide specific contract language. The proposed contract language is intended as a starting point in drafting a subcontract; specific language should, of course, reflect the specific conditions and requirements of the prime award and the institutional policies and procedures of the prime awardee.

Post-Award Management of Subcontracts

Receiving a Subcontract

The recipient of the subcontract processes and administers the subcontract award in a manner consistent with its practices for all other awards. This should include establishing a separate and unique account number for expenditures from the subcontract. This allows the project to be segregated from all others and for the project records to contain expenditure data for this project.

To facilitate a subcontractor's familiarity with obligations for billing the prime awardee and other subcontract requirements, it is useful to create a database or notes to the file. These can include any requirements which are not apparent or that are unusual so that anyone picking up the task of billing can easily recognize what is required.

The subcontractor should monitor its expenditures on the subcontract in a manner consistent with its stewardship of other awards. It should review expenditures to determine whether rebudgeting of subcontract funds is necessary, and it should work with the department, key personnel, and pre-award office to submit an appropriate request.

Administering Subcontracts

A prime awardee should establish appropriate systems for the administration of its subcontracts. This usually involves creating a special set of subcontract files, with tie-ins to the prime award file, and establishing clear procedures for reviewing, approving and paying invoices, for requesting report information, and for retaining the subcontract records for the required retention period.

It is particularly useful to establish a separate file from the prime award file to accumulate billings and correspondence regarding the subcontract. If subject to a future audit, the office will not be confusing documentation between the prime award and the subcontract.

To assure subcontractor compliance with the terms of the subcontract, key terms and conditions of the subcontract should be highlighted through notes to the file or on a database. Procedures can be established that perform a "mini-audit" before invoices are paid. This would include comparing monthly billing amounts to the budget and determining the need for rebudgeting. Is the invoice properly signed and certified? Is the invoice in enough detail to enable one to decide of reasonableness and to justify the expenditure? Is there need for proof of audit? These and other key compliance issues could be summarized in the form of a checklist. Finally, the retention requirements of the prime award should be applied to the retention of all records regarding the subcontract.

Modifications

As the collaboration proceeds, modifications to the subcontract may be required. Whether for a change in personnel, a substantive change in the statement of work, additional time (no-cost extension), rebudgeting, or increased funding, the request should be submitted to the prime awardee in writing, after being endorsed by the subcontractor's key personnel and authorized institutional official. Review of the request by the prime awardee should include the Principal Investigator and should be programmatically and well as financially and contractually based. The prime awardee should seek additional information when necessary to clarify reasons for the change and the benefits to the overall project. Moreover, it must determine whether the approval of the sponsor is required by the terms of the prime award. If sponsor approval is necessary, the request should be in writing and should come from the prime awardee, although it may refer to and attach the subcontractor's request. Depending upon the nature of the requested change, it might be prudent for the prime awardee to discuss the request with the sponsor to gauge how receptively the request would be received. If sponsor approval is required, no modification should be issued prior to receiving the sponsor approval in writing.

When the prime awardee approval and/or sponsor approval for the change has been received, the prime awardee can issue a Modification to the subcontract. An effective modification should clearly reference the original subcontract, alter those clauses which are affected by the change, and declare that all other clauses of the subcontract remain in force. As part of the formal subcontract, such a modification requires bilateral approval. It is convenient to number modifications.

Invoicing

The subcontractor should submit invoices on a regular basis and in a manner consistent with the terms of the subcontract. This not only allows for timely reimbursement from the prime awardee, but also enables the prime awardee to bill the sponsor regularly and to judge programmatic progress against spending patterns, and to project future average spending and perhaps positive variances. Billing instructions should be followed carefully to avoid questioned charges, returned invoices and delayed payment... The subcontract submission of regular invoices throughout the life of the subcontract will also limit problems Vice d with large billings at the end of the project.

The prime awardee should carefully review the invoice to ensure that it is in an acceptable format, that it includes the type of back up and justification which the subcontract requires, and that the spending is consistent with the budget and its categories. Any discrepancy should be clarified before the invoice is paid. Moreover, many institutions require that the Principal Investigator review and approve all invoices before they are paid. Prime awardees should try to pay subcontractor invoices promptly, remembering how much this will contribute to the collegial nature of the ongoing relationship.

Establishing Systems

To avoid unnecessary embarrassment, it is worth establishing simple systems in the office to ensure that all proposals which included proposed subcontracts result in the timely issuance of agreements. Unfortunately, it is not uncommon for a PI to discover, while preparing the first programmatic report and soliciting material from his or her collaborator that the subcontract work has not begun because no agreement was ever negotiated. Establishing simple procedures can prevent complicated and embarrassing situations.

Consistency

Most audit investigations try to answer this question: Does an institution have the necessary systems and are they applied in a consistent and reasonable manner? It is far better to be able to answer with a simple "yes" than with a long-winded explanation (e.g., that a particular form was not necessary because the sponsor of this subcontract was a private entity, while another subcontract has the form because while it appears to be from private sources, the funds are really government pass-through). In terms of expectations and in-house paperwork, it may be easier for staff to expect the same subcontracting materials on non-governmental subcontractual relationships and to complete the same checklists.

Certain circumstances, however, the agency's Grants Officer may specifically reserve the right to approve each subcontract document. One should carefully review the prime award, and the pertinent regulations before preparing end executing subcontracts.

Aside from protecting the interests of one’s organization, a subcontract has other important purposes: It provides evidence of one's institution's acknowledgment of its accountability to the

activities, and require a certification that the reported effort percentages are reasonable and accurate.

Each faculty member must be aware of his/her level of committed effort to sponsored projects, their ability to meet those commitments considering any other University obligations they may have and to communicate any significant changes in level of sponsored projects effort to his/her respective business office.

Financial penalties, expenditure disallowances, and harm to the University’s reputation could result from failure to provide accurate effort certifications or failure to comply with the University’s effort reporting requirements. All individuals involved in the effort certification process are expected to abide strictly by the provisions of this policy.

Policy Statement

- The University is committed to ensuring that effort reports completed in connection with sponsored projects are accurate.
- All faculty and staff who are involved in allocating salaries and wages to sponsored projects, managing sponsored projects, or completing effort reports are responsible for understanding the principles of accurate and timely effort reporting.
- In no case can the percentage of an individual’s salary charged to a sponsored project exceed the percentage of the individual’s total effort that is expended on the project during an effort reporting period.
- If the percentage of total effort expended in each effort reporting period is less than the percentage of salary charged to the sponsored project during the period, the salary charges must be reduced to reflect actual effort.

Every institution that receives federal grant or contract funds must abide by the same rules, including implementing an accurate effort certification system and ensuring that the federal government is not overbilled for effort that did not occur. Auditors may elect to review the effort certification system of any institution at any time, regardless of the type of institution or the size of its sponsored programs portfolio. Although the small size of an institution or a relatively modest volume of federally funded research may lower the probability of an effort certification audit, if it should occur, the magnitude of the impact of audit disallowances or a False Claims Act suit would be substantially greater, as small institutions generally do not have large monetary reserves from which to pay for disallowances, fines, settlements, and attorneys’ fees. Thus, any institution, regardless of size, is remiss if effort certification is not taken seriously and is not done in a way that satisfies federal regulations and ensures that the federal government is not overcharged for personnel time on sponsored projects.

The Statement of Work

As is the case with the General Provisions, it is very tempting to take the easy way out when writing a statement of work. Many subcontracts inappropriately include Statements of Work that say no more than, "The subcontractor will cooperate with the contractor in the project entitles..." While such an approach is a quick fix, it really tells the subcontractor nothing of substance and can easily lead to disagreements during the course of the work.

At the time the prime awardee or contractor submits its project proposal to a federal agency, the subcontractor should submit its proposal (statement of work and budget) to the prime awardee or contractor, and it should be signed by an authorized subcontractor signatory. The subcontract proposal needs to be approved by the prime awardee or contractor's Principal Investigator.

The Statement of Work does not have to be extremely long and detailed. It should, however, be a concise narrative summary of the work to be undertaken by the subcontractor. In fixed-price subcontracts, the Statement of Work should also contain performance standards and deliverable schedules.

The Budget

As noted above, the budget should be a part of a formal subcontract proposal. Every cost-reimbursement subcontract and each subcontract written under a prime grant should have a budget attached. The budget should be as detailed as necessary to indicate cost item accountability and should be in the same form as, if not more detailed than, the invoices and financial reports required under the subcontract. In general, percentages of effort or labor hours for personnel, fringe benefit rates, general and administrative rates, and indirect costs should be clearly established. If cost-sharing is required, the percentage and amount should be included on the budget page. Also, the subcontractor should use the same agency forms that are required of the prime grantee or contractor.

A budget is not required for fixed-price subcontracts. In such cases, however, sufficient data should be provided in the subcontractor's proposal to permit the prime awardee or contractor to perform a pre-award cost and price analysis. This is important because the prime awardee or contractor is not permitted to audit fixed-price subcontracts on a post-award basis

Why Such Attention to Detail?

Institutions are being called upon to exercise greater care in the management of federal funds and are being held accountable for actions (or inaction) to a greater degree than ever in the past. Therefore, particular care must be taken in writing subcontracts that are consistent with the terms set forth in the respective prime award contracts, are appropriate to the given circumstances, accurately reflect the nature of the subcontract relationship, preserve the government's rights, protect the prerogatives and responsibilities of the institutions, and treat the subcontractors fairly. Such care on the institution's part at the initiation of a subcontract is well worth the effort, as it will avoid potential cost disallowance, unnecessary disputes with subcontractors, and poor relations with federal sponsors. Furthermore, these efforts will facilitate the work conducted under federally funded projects, and that is the core responsibility of research administration.

- Significant Publications and Total Number of Publications

- Research Honors/Awards
- Selected Abstract(s) (In Layman's Language) of proposed areas of research interests for funding searches.

NOTE: This information should be updated annually, preferably at the beginning of the academic year. Up-to-date information is valuable to research administrators in doing specific funding searches and identifying individuals who have a potential interest in a special topic. It is also useful in determining which faculty members should receive a announcement. For example, there are programs restricted to individuals within 5 years of their terminal degree, to individuals who are U.S. citizens or permanent residents, to minorities, etc. The ability to identify these special constituencies can be important not only for identification of possible outside funding sources, but also for other internal institutional needs, such as abilities in a foreign language or a particular computer expertise.

30. APPENDICES

<u>APPENDIX A: Sign Off Sheet / Information</u>

Sign Off Sheet/Information

Name of Principal Investigator/Author: _______________

Department: Submission Deadline:

Title:

By signing below, I am confirming that I have read and approve the attached proposal for submission.

Dept. Chair: ______________________________ Date:____________________

Finance: _________________________________ Date: ____________________

Provost: _________________________________ Date: ___________________

Director OSP: ___________________________ Date: ___________________

*****NOTE: Five working days MUST be allowed for the approval process. The Sponsored Programs Office will submit the proposal, providing the PI with any copies that may be needed, if the following information is provided:*
Agency:
Submittal Type:

____

____

Note: Electronic HelloSign form can be used for Sign Off Sheet. Send email to the Director of Sponsored Research Program to initiate the procedure for electronic form. In the email, include the following: Title of the Grant and Contact information of PI (Name and Email Address)

INFORMATION FORM TO ACCOMPANY ALL PROPOSALS

1. **Does this project involve hazardous chemicals or biohazards? ( ) yes ( ) no; animal subjects? ( ) yes (X) no; human subjects? ( ) yes () no** (*Note: human subjects encompasses "surveys"). If the answer is yes to any of these three questions, the appropriate procedures must be followed; contact the Office of Sponsored Programs.*

2. **Is this a proposal for Fisk to serve as a subcontractor? () yes () no** *If the answer is yes, provide the name, address, and phone # of the principal contact on the reverse side of this page.*

3. **Does this project involve use of space not previously allocated for your use? ( ) yes ( ) no** *If the answer is yes, obtain the approval of the appropriate offices to whom needed space has been allocated under their authority and attach approval/commitment.*

4. **Does this project involve use of equipment or facilities over which you do not have control? ( ) yes () no** *If the answer is yes, obtain the approval of the persons in charge of the grant under which the equipment has been purchased. (Attach to this form copies of any required approvals for the use of facilities.)*

5. **Does this project involve cost sharing? ( ) yes () no If the answer is yes, is the cost sharing required by the agency? ( ) yes ( ) no** *(On a separate sheet, explain any cost sharing and if it is not required by the granting agency, justify your request.) Any agreement between you and a university officer concerning cost sharing should be attached and will be made a part of the condition for university approval.*

6. **Does this project involve any financial obligation on the part of the university not explicitly stated in the proposal, e.g. installation of new utilities? ( ) yes () no** *If the answer is yes, explain on separate sheet.*

7. **Does this project involve solicitation from private industry or foundations? ( ) yes () no** *If the answer is yes, obtain prior approval of the Vice President for Institutional Advancement to ensure there is no conflict with university fundraising efforts.*

8. **Does this proposal contain a descriptive summary (no more than one page) briefly describing what it seeks to accomplish in language <u>that is understood by a well-educated person with a liberal arts degree</u>? () yes ( ) no** *If the answer is no, please provide one.*

9. **Please attach a copy of the <u>full mailing instructions from the guidelines, including the date by which the proposal is to be received (due at agency), the complete mailing address, and the required number of copies.</u>**

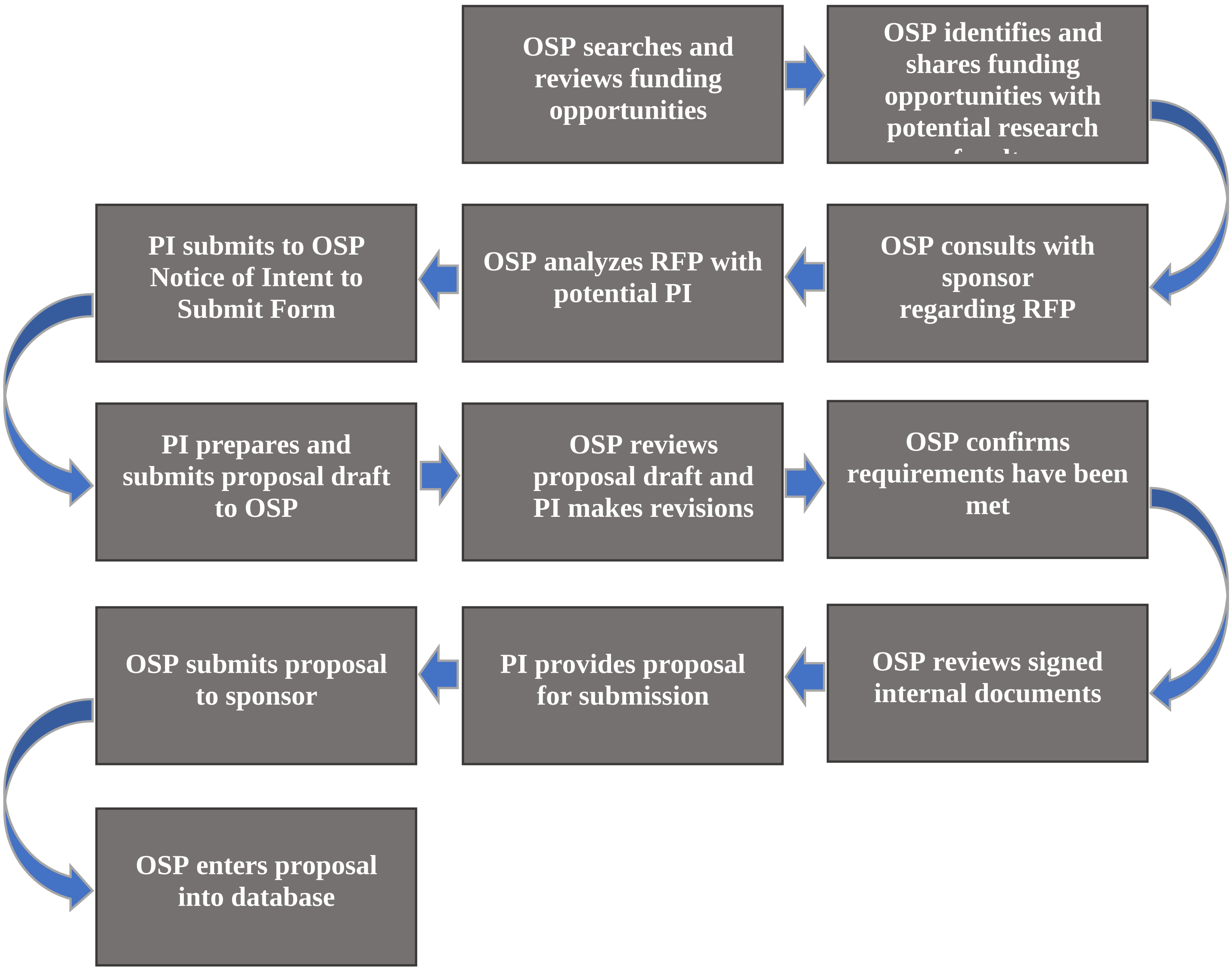
I certify that this form has been completed accurately and that the requested materials are attached.

____________________________________ ____________________________

PI Signature Date

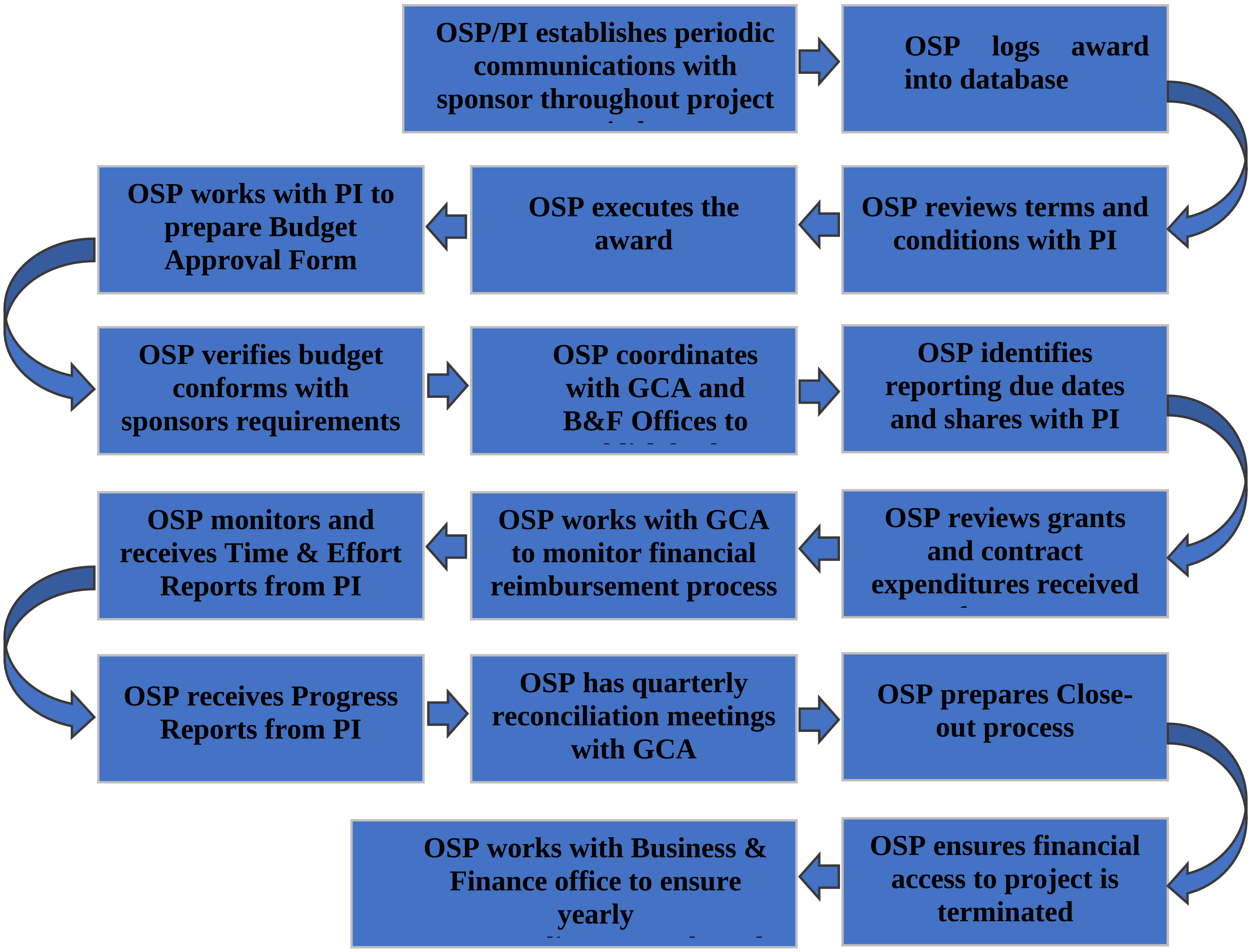
<u>Appendix B: Proposal Submission Process Flow Chart</u>

- OSP: Office of Sponsored Research & Programs
- PI: Principal Investigator
- RFP: Request for Proposal



Appendix C: Award Process Flow Chart

- OSP: Office of Sponsored Research & Programs
- GCA: Grants, Contracts, & Accounting Office
- B&F: Business & Finance Office
- PI: Principal Investigator



Note: Proposals not awarded will be analyzed by OSP, sponsor will be contacted, reviewer comments will be requested, and revised proposals will be resubmitted by PI/OSP in next funding cycle if applicable.

1.
2.