



**University of the
District of Columbia
Handbook
for
Principal Investigators**

**Prepared by the
Office of Sponsored Programs
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Preface

Research and sponsored programs are vital to the University System of the District of Columbia’s mission as a land-grant institution. These programs have the potential to advance and enhance our educational, research, and service activities and help us make progress toward the University’s vision of being “a diverse, selective, teaching, research, and service university in the land-grant tradition, serving the people of Washington, DC and the Nation.”

Through grants, contracts, and other agreements, the University obtains resources that enable and accelerate the accomplishment of the University’s goals, provide an outstanding 21st education to our students, foster the achievements and recognition of faculty and students, and drive the sustainability and economic development of the District of Columbia and the region. In this pursuit, the University seeks to increase its sponsored program portfolio dramatically, and to engage a sharply rising percentage of faculty and students in research advancing the Strategic Academic Program Plan (see sketch, below).

This *Handbook for Principal investigators* has been compiled by the Office of Sponsored Programs to assist faculty members, staff, and students at the University System of the District of Columbia in preparing successful proposals and in managing funded projects. It is a “live” document, which will be maintained on the website and updated, as needed, to stay current with sponsor requirements, forms, and University procedures. Please refer to the policies section and the forms library on the Office of Sponsored Programs website: <http://www.udc.edu/osp/>.

We welcome your questions, comments, suggested updates and improvements. The Office of Sponsored Programs stands ready to provide assistance for creating and submitting unbeatable proposals and managing funded projects successfully.

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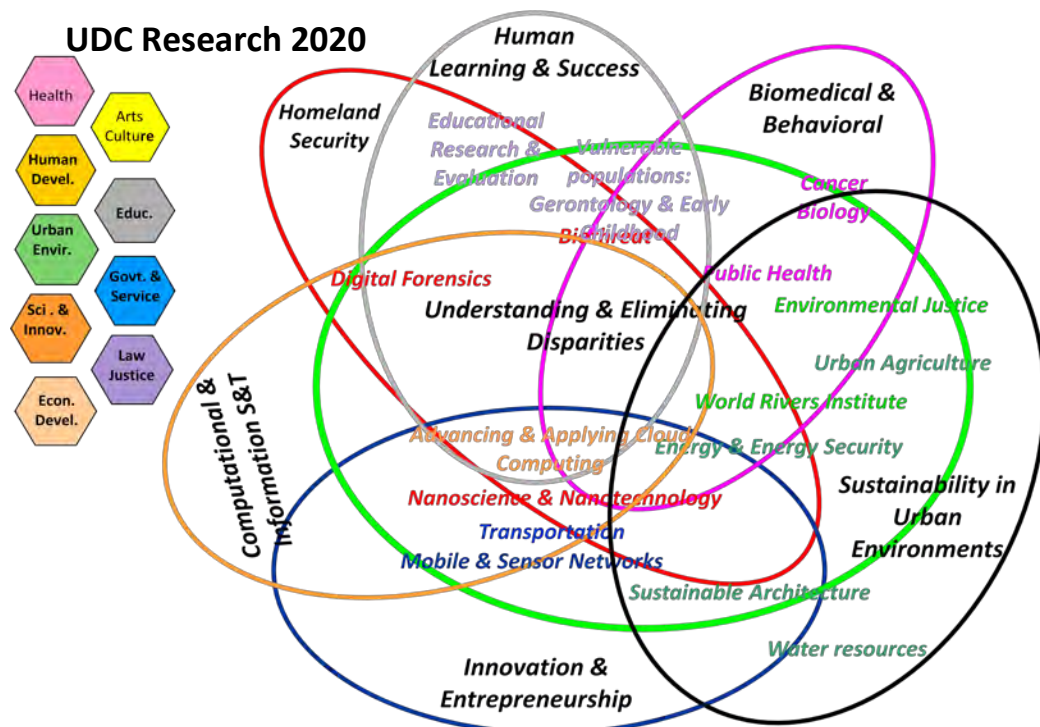


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University of the District of Columbia

Handbook for Principal Investigators

Introduction

The University of the District of Columbia is registered and authorized to receive and administer grants and contracts from the Federal, local and state governments and private-sector organizations. The University is responsible for developing and implementing systems, policies, and procedures that enable grants and contracts to be managed in accordance with the requirements of the sponsors. The Fact Sheet (Attachment I) provides essential information related to the University as a recipient of grants and contracts.

The Office of Sponsored Programs (OSP) is the centralized unit tasked by the University with the coordination of research and sponsored programs activities campus wide. The Office provides leadership, information, services, and support to the University community: faculty, research associates, students, and staff in the acquisition and administration of externally funded projects in furtherance of the instruction, research, and public service mission of the University. It is the function of OSP to ensure that the University complies with the regulations and guidelines of sponsoring agencies *and* with its institutional policies and procedures. The Office of Sponsored Programs partners with the Office of Grant Administration in the Chief Financial Officer's department to ensure the integrity of accounting and financial information and reports.

The purpose of the handbook is to provide a guide for current and prospective principal investigators (PIs) in the acquisition and management of grants, contracts, subcontracts, and agreements (both Memoranda of Understanding [MOU] and Memoranda of Agreement [MOA]). This handbook includes approved institutional policy statements and related procedures that govern externally funding proposals and awards. The guidance within applies to all grants, contracts, and agreements with Federal agencies, District of Columbia agencies, and others for which the University commits to provide certain described products or services or perform specified research or programmatic activities. It does not apply to applications for student financial aid resources (such as Pell Grants or Stafford Loans) or to agreements in which the sponsor pays tuition and fees at the published rates for students who attend regularly scheduled classes. Nor does it apply to proposals to private-sector organizations or individuals from whom the University Foundation is seeking philanthropic donations or support. These latter proposals are handled by the UDC Foundation.

Faculty and staff are encouraged to seek external funding to support the mission and goals of the University to advance research, teaching, and service. OSP's services include: (1) assisting in the identification of funding opportunities; (2) coordinating proposal and budget development; (3) registering/authorizing qualified University personnel to have PI privileges for developing and uploading electronic proposals; (4) formally submitting of proposals on behalf of the University; and (5) assisting with project set-up, implementation, management, compliance, and close-out.

It is the responsibility of the Principal Investigator/Project Director (PI) of a sponsored project to:

- Conduct the project in accordance with the approved proposal or agreement and the terms of the sponsor;
- Operate within the budget allocated and never incur budget overruns;
- Use funds only for expenditures allowed by the sponsor;
- Meet milestones and deadlines, including the submission of interim and final reports;
- Ensure the integrity of data and results published in any forum or medium;
- Comply with applicable regulations, policies, and procedures, including those related to human subjects, animal care, radiation protection, environment, health, and safety; and,
- Ensure the integrity of financial, administrative, and technical information provided to the OSP and/or the Office of Grant Administration (OGA).

Be sure to check the OSP website [www.udc.edu/osp] for the most up-to-date version of guidance from various agencies, updates to Federal and UDC policies, necessary forms, and the Fact Sheet (Attachment I).

ROLES AND RESPONSIBILITIES

Introduction

While UDC is ultimately responsible for all grants, contracts, MOUs, MOAs, etc, the Principal Investigators (PI), the Office of Sponsored Programs (OSP), Deans and Vice-Presidents, the Office of Grant Administration (OGA), and the Office of General Counsel (OGC) all have their own roles and responsibilities detailed as follows:

Principal Investigators

Principal Investigators have responsibilities that cut across the life of the project from conception through to close-out. These responsibilities can be divided into pre-award and post-award phases.

Pre-Award: The PI is responsible for:

- Developing the idea and ensuring that the appropriate guidelines are followed prior to submission;
- Crediting sources properly;
- Developing a budget in accordance with sound budgeting procedures;
- Contacting OSP as soon as possible after deciding to apply for the grant for guidance and assistance;
- Communicating clearly and often with Deans and VPs to ensure that there are no surprises;
- Having all the necessary routing forms signed by the appropriate parties; and,
- Ensuring all support letters are in place before the grant is submitted.

Post-Award: The PI is responsible for:

- Conducting the project in accordance with the approved proposal or agreement and the terms of the sponsor;
- Operating within the budget allocated and never incur budget overruns;
- Preparing a spending plan and establishing the account
- Using funds only for expenditures allowed by the sponsor;
- Meeting milestones and deadlines, including the submission of interim and final reports;
- Ensuring the integrity of data and results published in any forum or medium;
- Complying with applicable regulations, policies, and procedures, including those related to human subjects, animal care, radiation protection, environment, health, and safety; and,
- Ensuring the integrity of financial, administrative, and technical information provided to the OSP and/or the Office of Grant Administration (OGA).

Office of Sponsored Programs (OSP)

The Office of Sponsored Programs reports to the Associate Provost for Research in the Office of Academic Affairs. It is the centralized institutional office providing service, support, and non-financial compliance oversight for all sponsored work at the University. The office coordinates the University's sponsored program activities, supports and assists faculty and staff in the development, submission, implementation, and monitoring of grants, contracts, MOUs, and MOAs; helps to ensure that the university manages its sponsored programs portfolio in a manner that is fully responsive to and compliant with sponsor and internal expectations. These responsibilities cut across both pre-award and post-award phases.

Pre-Award: OSP is responsible for:

- Ensuring proposals comply with UDC and sponsor requirements, including budgetary requirements;
- Helping to develop grant-writing capacity and success;
- Providing assistance with finding sponsors and preparing competitive proposals;
- Helping PIs and co-PIs register on various funder websites, if required; and,
- Coordinating final internal approvals and serve as Authorized Organizational Representative (AOR)

Post-Award: OSP is responsible for:

- Maintaining post-award non-financial oversight & compliance, including staffing the Institutional Review Board (IRB) governing human subjects protocols, tracking responsible conduct of research training, ensuring compliance with time and effort reporting requirements and maintaining these reports;
- Maintaining grant files and documentation; and,
- Assisting PIs with grant management and administration including acting as a liaison between the PI and the Office of Grant Administration, the Office of General Counsel (OGC), and the sponsors.

The Office of Grant Administration

The Office of Grant Administration (OGA) reports to the UDC Budget Director, who reports to the UDC Chief Financial Officer in the DC Office of the Chief Financial Officer (OCFO). The Office of Grant Administration works closely with OSP and the PI, and it is a crucial partner in the successful accomplishment of sponsored projects. This office is responsible for fiscal activities related to the grant. These responsibilities are primarily involved in the post-award and project closeout phases. They include but are not limited to these vital post-award activities:

- Establishing grant budgets (creating an index, etc) in the Banner financial system;
- Executing approved budget modifications in the Banner financial system;
- Interfacing between the PI and other financial offices, which perform key financial functions (accounting, payments, draw downs, etc.) required by grants;

- Ensuring that only appropriate and PI-approved expenses are charged to the grant;
- Providing regular and required financial reports to the sponsor, the PI, and OSP; and,
- Verifying the availability of funds before financial commitments (hiring, purchasing) can be made.

Other administrative offices on campus include Human Resources, Procurement, and the Office of General Counsel, which perform the same functions for grants as for any personnel and procurement activities and who review and approve wording in MOUs, agreements, contracts and subcontracts.

PRE-AWARD

Introduction and Process Overview

Types of Awards

The University of the District of Columbia accepts awards in the form of grants, contracts, cooperative agreements, interagency agreements, memoranda of understanding (MOU), memoranda of agreement (MOA), and subcontracts. All proposals, whether submitted in response to a sponsor solicitation or without sponsor solicitation, must be developed in accordance with the University's policies and procedures, as set forth in this document. In addition, they must comply with the guidelines of the sponsoring agency.

Early Notification Process

Principal Investigators (PI) and Co-Principal Investigators (Co-PI) must inform their department head and dean or vice president of their intention to prepare a proposal requesting funding for a project as soon as they have decided to pursue the opportunity. In addition, they should contact OSP by email as soon as possible after the decision is made to pursue a funding opportunity, and not later than 20 working days prior to the deadline date for proposal submission. The purpose of this notification is to ensure that the University is eligible to apply for the specific funding opportunity; to ensure that the PI and co-PIs are appropriately registered with the sponsor, if required; to coordinate proposal development in those cases where there is a limitation on the number of proposals the University is allowed to submit; to make sure the PI and co-PIs are aware of the procedures, resources and support available for proposal development; and to provide OSP with information about any matching (funds or in-kind donations) that might be required or desired in time for these commitments to be coordinated with and agreed to by the responsible member(s) of the University's Administration. Attachment III provides the Technical Assistance Form PIs and co-PIs can use to request specific assistance from OSP.

Principal Investigator Registration Process

If the sponsor requires the University to register the PI and co-PIs, it is recommended that OSP be alerted as soon as possible. To enable OSP to accomplish this registration, the PI and each Co-PI must provide his or her name, type of highest degree, year highest degree awarded, email address, and phone number. Some agencies require additional information, such as social security number and/or date of birth. Usually registration goes smoothly and can be completed within a few days. Attachment IV provides a PI/co-PI registration information sheet. The PI/co-PI will receive notification from OSP and/or the Agency when registration is complete. If no notification is received within one week, please check with OSP, which will investigate why.

Proposal Routing Process

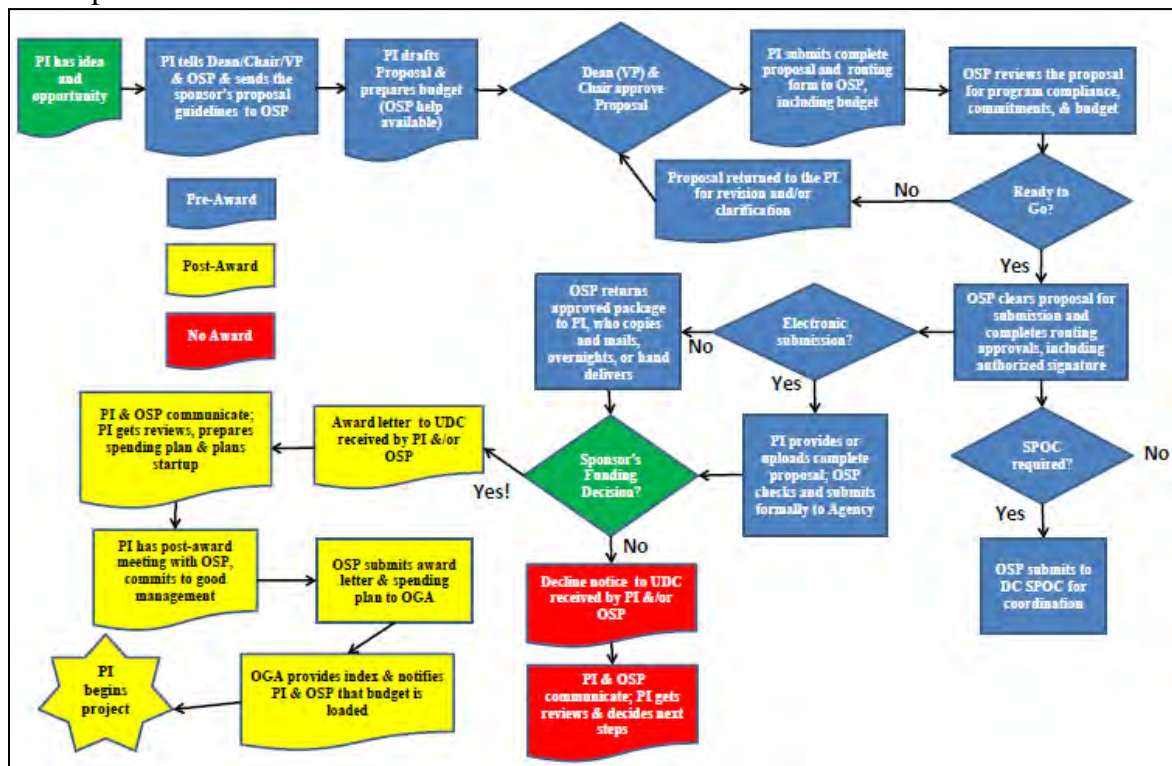
A Proposal Routing Form (Attachment II) must be submitted to OSP along with the final version of the complete proposal (including narrative, budget and support letters) and the sponsor's guidelines, no later than seven (7) work days before the submission deadline. Incomplete packages and those submitted less than 7 work days before the deadline cannot be guaranteed to meet the agency's deadline.

Approval for submission of the proposal and commitment to provide any match, such as space, faculty teaching release, or other resources, must be obtained from the academic department head and college/school dean (for faculty PIs) or from the department head and Vice President (for PIs from administrative units). These managers must sign the routing form to document their agreement that the proposal should be submitted by the University, and that they are committed to provide the described or desired support. In many cases, an explicit, signed support letter from the dean, Vice President, or President can be included as an attachment and strengthen the proposal's prospects. In some cases, a support letter is required.

OSP will read the proposal, compare it with the sponsor's guidelines and University policy, review the budget to verify that it complies with UDC pricing policies (including indirect costs and fringe benefits), and make sure that commitments and match presented in the text are identical with statements on the routing form. OSP will contact the PI, department head, and/or dean, as appropriate, to resolve any questions or concerns. Once this review is complete, OSP will obtain all subsequent approvals required including, as appropriate, from the Office of the General Counsel, OGA, and the Provost. **Please refer to Attachment II for line-by-line instructions for completion of the Proposal Routing Form.**

Proposal Development and Submission Process

The process described below applies to ALL proposals, MOU, and MOA, both academic and non-academic, except those that only provide direct student aid or pay published tuition for students to attend regularly scheduled courses. This process does not apply to requests for philanthropic donations through the UDC Foundation. The figure below shows in blue the pre-award process at UDC.



The Table below describes the major steps in the pre-Award process. Each step should be followed in sequence.

Step	MOU's/MOA's	Grant Proposals
1.	<p><u>Early Registration</u> Originator registers intent via OSP Website with notification to OSP, department head, and dean (or Vice President, if not in Academic Affairs). http://www.udc.edu/osp/proposal_reg.htm.</p>	<p><u>Early Registration</u> Originator registers via email and on OSP Website with notification to OSP, Department head, and dean (or VP, if not in Academic Affairs). http://www.udc.edu/osp/proposal_reg.htm</p>
2.	<p>Originator works on MOU/MOA with appropriate support and involvement. When MOU/MOA 'final draft' is completed, the originator obtains and completes the Proposal/MOU/MOA Routing/Review Form; secures signatures from department head and dean/VP, and submits one original to OSP, with a copy to the department head and the dean. The MOU/MOA, along with routing/review form, must be submitted to OSP at least 7 work days before due date.</p>	<p>PI works on proposal with appropriate support and involvement. When "final draft" is completed, the PI obtains and completes and signs the Proposal /MOA/MOU Routing and Review Form and secures signatures from the department head, and dean (VP, if not in academic affairs). The Proposal and the OSP Routing form must be submitted to OSP in hard copy and on CD or Flash Drive as a package at least 7 work days before the deadline for submission.</p>
3.	<p>During the 7-day period, OSP logs in MOU/MOA, reviews it, interacts with originator for clarification and/or modifications, obtains all other needed reviews and approvals; i.e., OGA, General Counsel (OGC), Facilities, etc., documented on routing form.</p>	<p>During the 7-day period, OSP logs proposal in, reads proposal, reviews budget and matching commitments, compares proposal with agency guidelines (if any) and works with PI on any clarification and /or modifications needed, obtains all other needed reviews and approvals, and clears as OK for submission.</p>
4.	<p>Still within the 7-day period, originator submits two final originals (one for UDC and one for other MOU Party) to OSP for final UDC signature (typically the Provost for the Flagship or System and the CEO for the Community College).</p>	<p>For electronic submission, depending on the e-portal, PI finalizes proposal and all attachments and uploads it for approval and submission; or provides OSP on a flash drive the proposal file with all forms and attachments for upload and submission.</p>
5.	<p>If the other party's signature is needed, both originals are returned to the Originator, who delivers both originals to other party, and ensures one fully executed original is returned to OSP.</p>	<p>For a paper submission, OSP obtains final signature on the appropriate form (provided by the PI) from Authorized Organizational Representative, keeps a copy of the complete application and routing form, and returns the complete proposal to the PI for copying and submission, per sponsor's instructions.</p>
6.	<p>OSP files the original, logs the action, and provides official notice that the MOU/MOA is active, with copies sent to OGA, OGC, the originator, department head, dean, and others, as appropriate. PI with OSP develops spending plan. OGA sets up the index, and the Originator initiates the work.</p>	<p>OSP files the copy and logs action. If an award is made, OSP will be notified, and will provide official notice of the award to OGA, the PI, department head, dean, provost or CCDC-CEO, and others as appropriate. PI with OSP prepares spending plan; OGA sets up the index and the PI initiates the project.</p>

Electronic Proposal Submission

For proposals electronically uploaded through electronic portals, such as Fastlane or grants.gov, the PI must provide a complete hardcopy or electronic files to OSP at least seven work days prior to the submission deadline. In an ideal situation, the budget and an abstract are provided two weeks prior to the submission date for budgetary committee review. In addition, as soon as the proposal has cleared through the internal routing process, the PI must provide the complete proposal file (all forms, the proposal, budget, all attachments and supporting documentation) ready for submission. Ideally this occurs at least 24 hours before the final closing deadline. Depending on the procedures of the portal, the PI must either have the entire proposal fully uploaded, or provide it to OSP on a flash drive in the proper format for uploading and submission. In either case, the complete file must be ready for final checking and submission by the Authorized Organizational Representative (AOR) at least one full work day before the final closing deadline. When submitting files electronically, the best format to use (in some cases the only format accepted) is .pdf format. Please advise OSP if the sponsor has any particular requirements about specific Web browsers or browser versions required by its website.

Proposal Development

Generally, proposals have certain components, such as a cover sheet; abstract; project description; budget; budget justification; bibliography; biographical sketches of the PI, co-PIs, and other key personnel; and supplementary supporting material. Frequently, the sponsor may specify exactly the proposal outline and components or may have defined page limits, margin sizes (minimum), line spacing, font sizes (minimum), and font styles. Be sure to follow the sponsor's instructions or your proposal may not even be considered. This requirement includes using the latest forms and instructions. Sponsors update their forms on a regular basis. All updates are posted on the OSP website: please check at News and Alerts (www.udc.edu/osp) for any changes that may have been announced since your last submission

Office of Sponsored Program staff can provide technical assistance, on request, with regard to completion of the face page (cover sheet), budget completion, certification, assurances and related forms, and interpretation of sponsor guidelines as well as editing of the submission and other technical assistance. If budget development assistance is needed, an appointment must be scheduled to meet with the OSP staff at least 14 work days prior to the deadline date for submission. Please refer to the Technical Assistance Form (Attachment III).

General Advice for Preparing a Proposal – Preparing a proposal can be a rewarding experience, especially if the proposal is funded. The key to success is to be disciplined, focused, well organized and meet the deadlines. By following these steps, UDC PIs can avoid common mistakes and errors. For best results, the PI should:

- Read the grant notification thoroughly and make a checklist of necessary components for a successful application
- Fill out the correct agency forms correctly!
- Provide all mandatory attachments and address all required topics!
- If the sponsor provides an outline or other formatting instructions, FOLLOW THEM!
- Carefully check/edit for spelling, grammar, and clarity.
- Arrange for support letters and matching commitment EARLY.
- Obtain and attach senior personnel bios, in the correct format, EARLY.

- Obtain friendly constructive pre-review from colleagues, and use it to improve the proposal.
- If the proposal involves multiple partners, start early and keep all partners engaged and involved.
- Meet internal processing deadlines. Proposals that are late may miss the submission deadline.

Project Description, Narrative, or Technical Approach – The project description, narrative, or technical approach is the main body of the proposal. PIs should develop the narrative in a succinct manner, paying careful attention to the sequence and ensuring that all required sections and topics are included while remaining within the page limitation. It may be helpful to use the headings outlined in the narrative description portion of the grant announcement as the initial outline for the narrative. The project description or narrative should address what the goals and objectives are, why the project is important and who it is important to, any contextual background or theoretical basis, hypotheses if applicable, what you plan to do and how you will do it, what preliminary data or track record you have and what makes you well qualified to do the project, what you will do if the primary approach doesn't work, what you expect the results will be, how you will know if the project is successful, and how you will publicize the results. Be sure to address all the topics required by the sponsor, paying careful attention to the review criteria. Specific proposals may require different sections.

Use headings, white space, bold, italic, figures, tables, captions, or other means to bring attention to the ideas and topics you want to emphasize. Structure the proposal to be easy for reviewers to read and evaluate against the criteria established by the sponsor.

Face Page (Cover Sheet) – Some sponsors, including Federal agencies, have a mandatory cover page or form, often called a face page. The information on this form indicates the specific program the proposal responds to and provides information about the applicant institution, the University of the District of Columbia. Information required to complete this form accurately is summarized in the Fact Sheet (Attachment I). Please check OSP website for most current instructions for Cover (424) form.

Abstract – Most funding entities require a summary or abstract of one-page or less. The summary is used for dissemination or public relations purposes. It should be jargon-free and comprehensible to the non-expert. It should connect clearly and in a compelling fashion with the mission and priorities of the sponsor. Consult program or sponsor guidelines for specific information on abstract specifications.

Table of Contents – The format of this section is often specified in the solicitation's General Section. At a minimum, the table of contents should identify major proposal sections. Some e-portals and agency proposal forms prepare the Table of Contents automatically.

Attachments – The solicitation's General Section or sponsor's guidelines will identify all required attachments, also called "supplementary material." Reviewers are not required to read attachments, so only supporting information should be provided there. Some solicitations LIMIT the attachments to a certain list of items, specify the maximum number of pages or specify a

specific total maximum file size. Required attachments usually include Assurance Forms signed by the designated University official and may include Letters of Support, Letters of Commitment, and other specific documents. If requested, Letters of Support should be acquired from external organizations that are not a part of the project but support the project as a benefit to the community and/or their work. Letters of Commitment or Memoranda of Understanding (MOU) or Memoranda of Agreement (MOA) from entities that will partner with and/or provide services to the project should be attached, if requested.

Some proposals require or allow a section on facilities available, either as a special document within the narrative or as an attachment. A listing of available “Research Facilities, Infrastructure, and Resources” at the University is provided on the OSP website. This document may be excerpted or used in its entirety, as appropriate, for the proposal. It is best to include only facilities that are relevant for the proposed project. Any faculty or staff member, who is aware of additional facilities, is requested to inform the Director of OSP, so that those facilities and infrastructure can be included in updates.

Budget

Proposal budgets must be developed in accordance with the University’s financial policies and the sponsor’s guidelines. OSP staff members are knowledgeable of these policies and are available to assist with budget development. Such assistance must be requested well before the agency’s submission deadline, using the form that can be found in Attachment III. Note that OSP will review the proposed budget in detail as part of the proposal routing process. Any proposal with a budget that is inconsistent with the University’s policies and/o the sponsor’s requirements CANNOT be submitted.

When developing a proposal budget, the PI must comply with both the budget requirements of the sponsor and the University. Funding must not be requested for services, effort, or items that the sponsor does not allow. It is a good idea, prior to developing the project budget, to think about the funding needed for the project to succeed, how the funding will be used, and how it can leverage other resources within the University or from partners. The following paragraphs provide information useful for developing project budgets; however, it is impossible to cover all possibilities. Consult with OSP early and often to avoid serious budget problems that could prevent submission of the proposal.

Salaries – The University manages and sets salaries and wages for individuals and positions. All salaries in grant budgets must comply with the approved institutional salary range or represent the actual salary of the individual to perform the work. The amount available in the budget of a sponsored project does not determine the compensation for any individual or position. Therefore, external funding cannot be used to increase University-established salaries.

External funds may be used to support summer salaries for 9-month faculty. Charges for work performed by faculty members on sponsored program agreements during summer months or other periods not included in the base salary period must be calculated for each faculty member at a rate not in excess of the base academic year salary, divided by the period to which the base salary relates. In other words, the grant proposal budget cannot contain a summer salary that is

higher per month than the faculty member's monthly salary during the academic year. In no case can the total summer compensation from all sources paid by the University to a faculty member exceed 33% of the salary for the immediately completed academic year. Faculty members cannot be paid during the academic year in excess of their base salary. For more information, see the section titled, "Important Post-award Topics."

Fringe Benefits – Fringe benefits are specifically identified for each employee and are charged individually as direct costs. Vacation, holiday, sick leave and other paid absences are included in salaries and wages claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the costs of these paid absences. Fringe benefits include FICA, retirement, disability insurance, life insurance, workers compensation, unemployment insurance, health insurance, and dental insurance. Please contact the Office of Sponsored Programs for the latest fringe benefit rates.

Travel – The budget should indicate the purpose, frequency, and number of persons to be involved in expected travel. The University will pay reasonable travel and subsistence costs, consistent with University policies and as reflected in the approved budget. Travel budgets are scrutinized closely by agencies, and certain kinds of trips, such as international travel, may not be allowed. Only request travel funding if the program allows, and only request the minimum necessary and reasonable to accomplish project goals and objectives and disseminate its results.

Equipment – Federal guidelines define equipment as individual items costing at least \$5,000 with the durable life of a year or longer. All items costing less than \$5,000 should be budgeted under supplies. The budgeted amount should include freight, shipping, handling, and other related costs. Maintenance agreements, if purchased separately from the equipment, should be budgeted under services or contracts.

Facilities and Administrative Costs (F&A)/Indirect Costs – The University's approved F&A rates for grants, contracts, and other agreements with the Federal Government are based on Modified Total Direct Costs (MTDC). Modified total direct costs consist of all salaries and wages, fringe benefits, materials, supplies, services, travel, and subcontracts (up to \$25,000). If the sponsor requires a specific lower percentage base (i.e. 8%, 10%, 15%, etc.), the PI must provide documentation of the agency's rule with the proposal and signed routing/review form. (Refer to the Proposal Routing and Review Process Chart above.)

Equipment, capital expenditures, charges for patient care, participant costs, student tuition and fees, rental costs of off-site facilities charged directly to the grant, scholarships, fellowships and subcontract amounts in excess of \$25,000 shall not be included in the base upon which facilities and administrative/indirect costs are calculated, when the full approved F&A rate is used. When sponsors specify a lower rate, often the base is allowed to include many of the normally excluded items.

The following F&A rates have been approved for the University through 2011 (negotiation is underway for a new agreement. The Fact Sheet on the OSP website has current information:

- On-campus – 46%
- Off-campus – 22%.

For activities performed in facilities not owned by the institution and to which rent is directly allocated in project(s), the off-campus rate will apply. Grants and contracts are not to be subjected to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate applies to the entire project. If your project is taking place at any UDC site, e.g. PR Harris, Backus, 801 North Capital, please use the on campus rate.

Cost Sharing/Matching – Cost sharing or matching are terms used interchangeably to represent the support and contributions the University commits to provide to the project. Cost sharing or matching can be provided in the form of money (cash or budget) or “in-kind” support or services. In-kind contributions represent non-cash contributions.

University policy is to provide only the minimum amount of match necessary to meet the sponsor’s requirements. When cost sharing is required, the preferred type is “in-kind” matching in the form of faculty, senior researcher or staff time and effort. Other possible types of match include partial tuition waivers or scholarships, use of specialized equipment not purchased with previous Federal (or sponsor) funds or previously used in a match, and special facilities upgrades/investments.

Cost sharing, when required, must be reflected in the proposal budget. The Proposal Routing/Review Form must be clearly marked in the appropriate box to indicate that cost sharing is being proposed. The detailed nature and source of cost sharing must be described on page two of or accompanying the Proposal Routing Form. The dean and department head must commit on the Proposal Routing Form to providing the match by their signature. If the proposed match is not available within the department or college or school, OSP must be enlisted early to work with the PI and arrange with the appropriate Vice Presidents for the portion of the match not available within the department, school, or college. Proposals relying on or even mentioning any form of cost sharing that has not been approved by Administrators with the resources and authority to provide the match will not be submitted to the sponsoring agency for consideration and review.

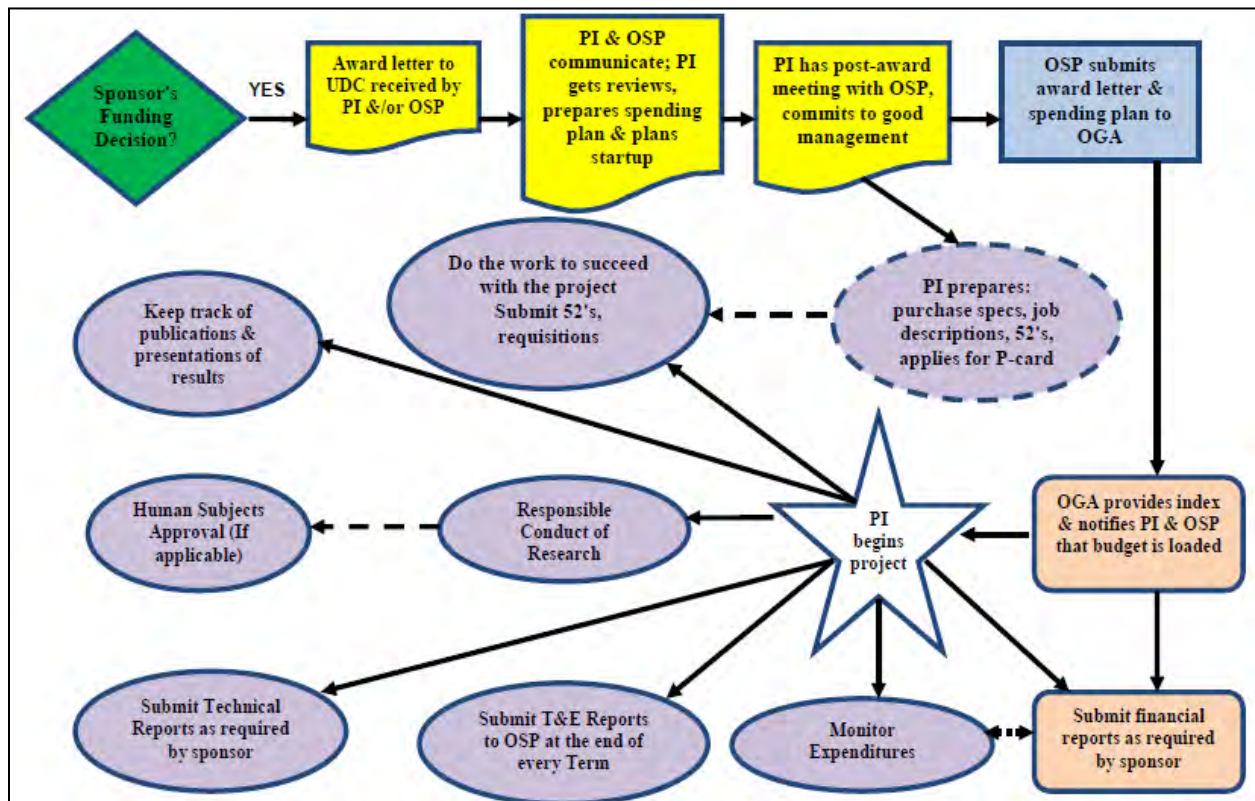
Official Signing for Applicant Organization – The official signing for the Flagship University is the Provost and Vice President for Academic Affairs. The official signing for the Community College is the Chief Executive Officer. For proposals involving both the Flagship and the Community College, the Provost is the signing official. The official signing for proposals funded by the United States Department of Agriculture under the Land-Grant program is the dean or higher level administrator designated by the University and USDA as responsible for the Land-Grant research and cooperative extension programs. The Associate Provost for Research and designated personnel in OSP serve as the authorized representatives for these signing officials.

Single Point of Contact – Unless otherwise required by the sponsor the Director of Sponsored Programs shall act as UDC’s official administrative point of contact.

Negotiations – All pre-award negotiations on behalf of the University for Sponsored Programs shall be led by the Associate Provost for Research and the Office of Sponsored Programs.

POST-AWARD

Congratulations!!! You have succeeded in securing a grant award, cooperative agreement, interagency memorandum of understanding/agreement, or sub-contract. Now the work begins. The Office of Sponsored Programs (OSP) will serve as a resource to help troubleshoot barriers to project success and assist with and monitor non-financial compliance. The Office of Grant Administration (OGA) is responsible for budget, accounting, financial documentation, compliance and reports. The following figure illustrates key steps and important responsibilities in the post-award process at UDC.



Notification of Grant Award (NOGA)

When a contract/grant/cooperative agreement has been awarded for a program or project, the sponsoring agency issues a formal Grant Award letter or (signed contract). Depending on the agency, the award notice is sent to the President of the University, the Provost, the Authorized Organizational Representative, or the PI. Anyone receiving the NOGA (electronically or via mail or fax), should notify OSP. OSP ensures that the notice is forwarded to the PI, Department Chair, Dean or Vice President, and OGA. **A Grant Award or approved contract does not immediately authorize the PI or project director to spend or obligate funds.**

The grant account, called an index, must first be established by OGA. Funds may be obligated by the PI, only after he or she receives a written notification from OGA that the grant setup process is complete. This notification confirms the project’s Banner index and fund codes as well as any special terms and conditions.

Under no circumstances will an agency’s “letter of funding intent” or an informal communication from a program officer of the agency be accepted as evidence of a program award or obligational authority.

Notifying Office of Grant Administration

Upon receipt of the Grant Award or signed contract, the PI, along with OSP, will develop the Grant Award Package to be forwarded to OGA, upon completion. Please contact OSP for the latest Grant Award Package.

Steps in the post-award process are illustrated in the following chart and described in the following table for grants, cooperative agreements, research contracts, and MOUs/MOAs that bring funding to the University to support specific work or projects.

Post-Award Procedures for Grants or other Funding Agreements
1. Receive NOGA
2. PI and OSP communicate, to be sure both know about NOGA.
3. PI obtains reviews from sponsor (if available) and uses them to help plan the work.
4. PI meets with OSP to review all aspects of the award; prepare the spending plan; ensure the PI and co-PIs understand the grant conditions, compliance requirements, reporting requirements and due dates; and assemble the information required to be submitted to OGA to establish the budget and create the index. PI commits to good management and compliance.
5. OSP submits the information package (NOGA, proposal, reporting requirements, and spending plan) to OGA, with a request to establish the budget and index.
6. OGA notifies PI and OSP of the index and funds availability.
7. PI begins the project, administering the budget as stipulated in the NOGA, proposal, and complying with applicable regulations, policies, procedures, and guidelines of the sponsor and the University.

The package to be sent to OGA must include:

- A copy of the official Grant Award letter (NOGA) with all the terms and conditions.
- A Spending Plan – This plan must be provided in the University’s format, which is different than the grant budget submitted with the grant application. To set up the Banner coding attributes, the budget must be transformed into a spending plan with the appropriate codes. The spending plan template and the list of appropriate codes can be obtained by contacting the Office of Sponsored Programs, which will have the most recent versions, or by visiting the OSP website. An index cannot be established and grant funds may not be obligated or spent unless this plan is completed correctly. OSP can advise on completing the template appropriately.

- Grant Reporting Requirements – The reporting requirements for the grant, both programmatic and fiscal, need to be outlined along with appropriate due dates. These requirements may or may not be part of the Grant Award letter. If they are not part of the Award Letter, the PI is required to research and document all reporting requirements prior to the obligation of funds.
- If the grant award requires or the submitted proposal committed to a “match,” upon award, the PI must immediately contact the University official who approved or committed to the match to identify the source of the match. The PI must then communicate this information (index, fund, account) to OSP and OGA as part of the package. The Office of Grant Administration will be responsible for monitoring and tracking the match expenditures or value as the grant proceeds, so it is essential for OSP/OGA to be informed what the source or nature of the intended match is. It may be necessary to set up a distinct account for the match.
 - Cash Match Requirements: If the Grant Award includes or the proposal commits to a Cash Match using local funds, the PI is required to contact OGA for an index code to identify cash match from non-grant (local) funds. No federal funds (including Title III or pass-through funds from the District) can be used as part of a cash or in-kind match for a federally funded project.
 - In-Kind Match Requirements:
 - Personnel: The PI must list the employee’s name and position as well as the value and percent of employee time given to the match. The value of employee time should be based on current salary.
 - Non-Personnel Expenditures: The PI must identify the expenditure amount (and index code) on the original requisition and Purchase Order (P.O.) to account for any expenditure when paid for by non-grant (local) funds.

Pre-Award Expenditures – Some sponsors allow grant recipients to spend grant funds within a specified period (90 days for some Federal agencies) PRIOR to the official award being made. When such expenditures are made, the University is taking a risk, and will need to cover the costs from its own resources, in the event the sponsor does not make the award.

Only under limited circumstances will the University allow pre-award expenditures. The decision is made on a case by case basis by the Managing Director for Finance on the recommendation of the Associate Provost for Research.

A decision to allow pre-award expenditures will only be made if all of the following criteria are met:

1. An official representative of the sponsor has communicated in writing the sponsor’s intent to make the award, or the sponsor’s website shows the project as “recommended” in its proposal status screen. Alternatively the award could be for a continuing period of a multiyear grant, for which the sponsor obligates funding for the coming period via an award letter or modification, and administrative factors delay the new award letter beyond the end date of the prior phase, leaving a funding gap.
2. The amount of pre-award expenditures anticipated would be both small in absolute size and relative to the total size of the grant.

3. The pre-award expenditures are necessary to keep the project on track, to deliver on commitments made to students pursuant to the grant's purpose, or to satisfy deadlines that are beyond the University's control.
4. The sponsor allows pre-award expenditures.
5. The expected date of the award is well within the time limit under which pre-award expenditures would be allowed by the agency.
6. The purpose for which the expenditures would be used is included in the approved project budget and allowable by the sponsor.

A PI desiring to make pre-award expenditures must submit a written request to the Associate Provost for Research, who will review the request and make a recommendation to the Managing Director for Finance. The request form is available on the OSP website and included as Attachment VII in the Appendices. If the request is approved, the Director of OGA will set up the account and enable the spending to happen, within the approved limits. The request must include the following:

- Sponsor, title, and description of the anticipated grant or agreement;
- Copy of documentation demonstrating sponsor's intent to make the award and approval of pre-award expenditures, including the maximum allowable amount, if applicable;
- Itemized budget for pre-award expenditures (in UDC's budget categories and in the submitted grant budget);
- Justification of urgency of the pre-award expenditures.
- Anticipated date of receipt of the award; and
- Signatures of the PI; department head; and dean/VP.

Compliance in Non-Financial Matters

Introduction -- UDC's acceptance of funding for a sponsored project carries with it the legal responsibility to comply with all terms and conditions of the award, including any mandated prior approval of post-award fiscal and administrative changes. Specific levels of prior approval are determined first by the sponsor's regulations and guidelines and second by the internal UDC policies and procedures.

Compliance is critical to successful development and implementation of a grant-funded project. Sponsored program awards will be monitored by OSP staff to ensure compliance, as stipulated in the award or required by the sponsor. The designated OSP compliance officer can also provide technical assistance to ensure compliance. The following policies and procedures must be followed after receipt of an award.

The PI is responsible for the management and administration of his/her individual award within the constraints outlined by the individual sponsor in the terms of the award and in accordance with University policies and procedures governing grants, contracts, agreements, or subcontracts.

In addition, throughout the period of the project, it is the PI's responsibility to supervise the performance and effort of any staff, students and/or research assistants who are also working on the project. If there are eligibility restrictions for students or personnel to receive funding of

scholarships from the grant, it is the responsibility of the PI to verify eligibility and keep copies of documentation that demonstrates eligibility. In no case shall grant funds be used in ways that are not allowed by the sponsor or UDC internal policies and procedures

Responsible Conduct of Research --The University expects that faculty, staff, and students will conduct research responsibly. This expectation applies to all types of research and research settings, including but not limited to laboratory research; literature research; internet research; field research; research using human subjects or animals; and computer-based, computational, and theoretical research. Faculty and staff must stay current in the issues surrounding the responsible conduct of research in general and in their specific research areas.

Responsible conduct of research is a significant component of professional ethics for disciplines in which research is performed. Departments should include RCR outcomes and instruction in their learning goals, curriculum, courses, and seminars. Faculty members have an important responsibility to educate students at all levels about the ethics and professional norms of research both generally and in their specific disciplines. Part of educating students and supervising their research involves helping them learn the knowledge, skills, and attitudes associated with performing research responsibly and ethically. Students include pre-college students, undergraduate students, graduate students, and post-doctoral fellows.

In addition, responsible conduct of research has recently been made explicit in the requirements of at least some Federal government agencies. For example, section 7009 of the America COMPETES Act (42 U.S.C. § 1862o-1) and its corresponding regulations (74 Fed. Reg. 42126-28 (Aug. 20, 2009)) requires institutions applying for assistance from the National Science Foundation to conduct research responsibly and provide documented training to students in a more formal way than has been traditional.

The University has joined the Collaborative Institutional Training Institute (CITI), located at the University of Miami. CITI offers institutionally tailored on-line courses in the responsible conduct of research. Courses are available for each research area (biomedical, engineering, physical sciences, social and behavioral sciences, and humanities). The CITI courses include tests of knowledge and provide documentation of satisfactory completion.

- (1) Each student (undergraduate and graduate) and post-doctoral researcher who conducts research (paid or unpaid) is required to have a foundation of documented training in RCR. This foundational requirement can be met by having the student take and pass (>80%) the appropriate CITI RCR on-line course prior to doing research at the University. The CITI courses are found at www.citiprogram.org. Students must take a refresher course if 2 years or more have elapsed since the previous documented RCR training.
- (2) Faculty supervising student research shall provide the students with additional mentoring in RCR, as well as in the specific research and analysis protocols and procedures appropriate to the project.

- (3) The University recommends that faculty and staff members engaged in research take the CITI course appropriate to their discipline every 2 years, and provide feedback to the Office of Sponsored Programs to improve the curriculum.
- (4) The Principal Investigators of sponsored research projects are responsible for understanding and fully implementing the specific sponsor's requirements for RCR training for all persons participating in the project, including faculty, staff, students, and other collaborators. The University's foundational training requirement, above, satisfies the National Science Foundation's requirement for student RCR training. If supplemented by at least 8 hours of documented in-person mentoring and/or face-to-face coursework, the required RCR training also satisfies the National Institute of Health's requirement for student training. When sponsors require more than the foundational training, the Principal Investigator is responsible for certifying to the Office of Sponsored Programs the training method, content, and date the sponsor's RCR training requirements are met for each student paid through the grant or contract.
- (5) The Office of Sponsored Programs is responsible for maintaining the CITI membership, maintaining documentation of RCR training, and updating the on-line curriculum with institution-specific content. All documentation demonstrating satisfactory completion of RCR training shall be submitted to the Office of Sponsored Programs.
- (6) For research projects involving human subjects, additional specialized documented training and institutional review of research protocols are required to assure the protection of these subjects. Researchers whose projects involve human subjects must obtain Institutional Review Board (IRB) approval before beginning their work. Obtaining approval may include submitting proof of completion of human-subject-protection coursework found at <http://phrp.nihtraining.com>. Additional information is available at <http://www.udc.edu/irb/>.

Research Misconduct: The White House Office of Science and Technology Policy (OSTP) has developed a definition of research misconduct that is accepted by all Federal agencies. OSTP (http://www.ostp.gov/cs/federal_policy_on_research_misconduct) and 42 C.F.R. § 93.103, part of the Public Health Service's policies on research misconduct, define research misconduct as:

“[F]abrication, falsification or plagiarism in proposing, performing or reviewing research or in reporting research results.” Fabrication is defined as “making up data or results and recording or reporting them.” Falsification is “manipulating research materials, equipment or processes or changing, omitting, data or results such at the research is not accurately represented in the research record.” Plagiarism is “appropriation of another person's ideas, processes, results or words without giving appropriate credit.” Research misconduct does not include honest error or differences of opinion.

The definition of research misconduct lists fabrication, falsification, and plagiarism as the three types of unacceptable practices that set a “floor,” or minimum standard, in research.

University faculty, staff, and students engaged in research must understand and avoid these unacceptable practices, and go beyond them consistently to achieve the highest professional standards of responsible and ethical research in their respective disciplines.

The University of the District of Columbia holds all researchers, whether faculty, staff or students, accountable for the conduct of the research they perform. Faculty and staff are responsible for assuring the conduct of research by students they supervise.

- (1) Anyone who observes research misconduct or has evidence of possible research misconduct is obliged to report it to the supervisor, dean, or Associate Provost for Research. The individual receiving the report must convey it promptly to the Associate Provost for Research.
- (2) The University allows individuals to report suspected research misconduct confidentially and protects them from retaliation.
- (3) Any concerns about the integrity of specific research should be directed to the Associate Provost for Research, who is responsible for ensuring that the concern, observation, or suspicion is investigated promptly and objectively, and for reporting the results of the investigation per applicable Federal requirements.
- (4) The University will impose appropriate discipline in cases of substantiated research misconduct by faculty, staff, or students.

For up-to-date information, the University's Policy on Responsible Conduct of Research may be viewed at www.udc.edu/osp/udc-policy.htm.

Health, Safety, and Environmental Protection – As a leader in the local community, the University of the District of Columbia is committed to: (1) protect the health and safety of students, neighbors, visitors, staff, faculty, and the local community; (2) meet or, where practical, exceed the requirements imposed by applicable safety and environmental laws and regulations; (3) conduct activities in a manner that safeguards the environment; (4) reduce the use of toxic or hazardous substances and the generation of wastes; (5) adopt processes, practices, materials or products that avoid or reduce waste generation through process changes, recycling, more efficient use of resources or material substitution; (6) manage and dispose of wastes in an environmentally sound manner; and (7) maintain associated records and documentation, as required. Every member of the University community must do his or her part to meet this commitment.

Protection of Human Subjects – The University of the District of Columbia conforms to and abides by scientific and administrative guidelines and procedures required by the U.S. Department of Health and Human Services (DHHS) for the protection of human subjects. In accordance with Federal regulations, the University has an *Assurance Agreement* with the Federal government, which describes University policies and procedures for the protection of human subjects in research. To fulfill this responsibility, the University has established an

Institutional Review Board (IRB), populated by University personnel and members of the public, appointed by the Institutional Official responsible for the Human Subjects Protection Program.

The University has a responsibility to assure that research involving human subjects must be conducted in a manner that protects the privacy and safety of the subjects. Additional protections must be provided when the subjects are children, prisoners or pregnant women; are vulnerable to exploitation in an identifiable way; or have potentially compromised understanding of the research project being conducted. If children are involved in the research, the IRB must certify that the activity is within permissible categories, and that adequate provisions are made to solicit the assent of each child and the permission of each child's parent or guardian (45 CFR 46.404-408). Individuals involved in human subjects research should be treated as autonomous agents.

The complete requirements are specified in Title 45 of the Code of Federal Regulations, Part 46. The requirements apply to research conducted by faculty, by students, or by any others conducting programs within the University's scope of work. The University must assure that human subjects enter the research voluntarily, with adequate information, and are treated in an ethical and just manner. 45 CFR 46, the "Common Rule" defines a *human subject* as a living individual about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information. All research that includes human subjects as defined above is under the purview of the IRB.

All research that involves human subjects MUST be submitted to the Institutional Review Board for review and approval. Under no circumstances may human subjects research be supported or conducted prior to certification (45 CFR-46.103(f)). Under the terms of the *Assurance Agreement*, all projects involving human subjects must be reviewed and approved by the Institutional Review Board prior to submission. This review is required whether the research is faculty or student-directed and whether it is funded or unfunded. There are three levels of review, exempt, expedited, and full board review. Exempt and expedited review are defined by statute (45 CFR 46), and under the terms of the assurance, all human subjects research projects must have an IRB approval or exemption letter attached to the project prior to commencement. All research that is not exempt or expedited is subject to a full board review where a quorum of the IRB members must be present and there is a vote whether or not to approve the submission.

All exemptions must be validated by the IRB or its chairperson or designee via a submission to the IRB, and the exemption must be documented by a letter from the chairperson or designee. Generally categories of research that could be exempt are: educational research activities involving normal educational practices; comparisons of the educational effectiveness of various pedagogical approaches; cognitive, diagnostic, aptitude and achievement tests or observations of public behavior in which individuals cannot be identified; studies in which the human subjects are public officials or candidates; research involving publically available sources of existing data or information recorded in a manner that prevents identification of subjects; and consumer taste/acceptance studies involving wholesome foods without additives or containing only ingredients at or below levels found to be safe by the Food and Drug Administration, Environmental Protection Agency, or U.S. Department of Agriculture.

The IRB uses IRBNet for all IRB submissions. Detailed instructions as to how to submit an application can be found on the IRB website (www.udc.edu/irb). All submissions must be accompanied by a completed Application for Review by the Institutional Review Board, including any applicable attachments. Please refer to the website (<http://www.udc.edu/irb>) to access the Application for IRB Review form (also included in this manual as Attachment X). This website should be reviewed periodically for changes. To apply to the IRB, the PI or researcher must first-register with IRBNet. To register, go to www.irbnet.org and click new user registration on the left side of the screen. Use your first initial and last name as your User ID. For specific instructions please click the link for IRB Login Registration Tips.

Student research subject to IRB review (http://udc.edu/irb/stu_res.htm) includes studies intended to satisfy the academic requirements for independent study, Master's thesis, or doctoral dissertation; intended to result in publication, presentation outside the classroom, or public dissemination in some other form; and those studies conducted outside the classroom and/or departmental research participant pool if they involve minors, or populations of adults whose ability to give informed consent freely may be compromised. For UDC students conducting research as part of an academic program including theses, all requests for review must list the faculty member as the PI, and the student researcher as the Co-PI and both must digitally sign the submission package.

Protection of Laboratory Animals – The University is committed to ensuring that laboratory and other research animals are used and cared for in a humane and appropriate manner. Before any research project involving the use of living laboratory vertebrate animals, such as mice, rats, moles, gerbils, pigeons, birds, fish, etc. can be proposed, the University must establish and activate a review and approval committee and process. Any researcher desiring to use vertebrate animals in research, must notify the Associate Provost for Research at least three (3) months prior to the proposal deadline, so that the systems and processes to ensure humane animal treatment can be activated in full compliance with the regulations, or alternative solutions can be arranged.

Radiation Safety – The University is licensed by the Nuclear Regulatory Commission (NRC) for limited use of radioisotopes and radioactive materials. Any new project intending to use radioactive sources or isotopes must be reviewed in advance, provisions must be made for safe handling and disposal of the materials, and notification might need to be sent to the NRC. For information regarding radiation safety requirements, contact the Office of Sponsored Programs.

Data Management Plans --The University of the District of Columbia's (UDC) mission as a public land-grant institution of higher education requires us to engage in research of importance to the District of Columbia and the nation, to ensure the integrity and reliability of the research, and to facilitate transfer of the results of the research to benefit society and expand the knowledge base of the discipline. The University's policy is that the Principal Investigator (PI) is responsible for understanding and fully implementing the specific sponsor's requirements in all respects. When research is supported by public funds, the data obtained should be appropriately and responsibly managed, and they should be shared to maximize its benefits to the taxpayer.

The National Science Foundation requires proposals to include plans for managing data and sharing of the results of research it funds. Fastlane no longer permits submission of any proposal that is missing a Data Management Plan. The Data Management Plan cannot exceed two pages in length, and it will be reviewed as part of the intellectual merit or broader impacts of the proposal, or both, as appropriate. The Data Management Plan should detail how the proposal will conform to NSF policy on the dissemination and sharing of research results (see the National Science Foundation's Award and Administration Guide (AAG) Chapter VI.D.4). If no data are involved in a particular proposed project, the Data Management Plan can be very short and simply state this fact.

Many factors—some of them discipline- or field-specific—are involved in the management of data. The Data Management Plan should reflect best practices in the area of research, and it should be appropriate to the data produced. The process of preparing a Data Management Plan gives the PI and collaborators an opportunity to address prior to starting the project, such matters as:

- The types of data that the project might generate and eventually share with others, and under what conditions;
- How data are to be organized, managed, maintained, archived, curated, and protected against distortion;
- Factors that might complicate or compromise the data or their management, for example possible legal or ethical restrictions, human subjects concerns, etc.;
- The level at which data are to be aggregated, prior to sharing them with others in the scientific community, given that community's norms on data;
- The mechanism for sharing data and/or making them accessible to others;
- Other types of information that should be maintained and shared regarding data, e.g. the way it was generated, analytical or procedural information, and any associated metadata.

What type of data is covered under a Data Management Plan? The federal definition of data covered by a Data Management Plan is provided in 2 CFR 215, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations* (also known as OMB Circular A-110). Research data are defined as:

“the recorded factual material commonly accepted in the scientific community as necessary to validate research findings, but not any of the following: preliminary analyses, drafts of scientific papers, plans for future research, peer reviews, or communications with colleagues. This “recorded” material excludes physical objects (e.g., laboratory samples). Research data also do not include:

(A) Trade secrets, commercial information, materials necessary to be held confidential by a researcher until they are published, or similar information which is protected under law; and

(B) Personnel and medical information and similar information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, such as information that could be used to identify a particular person in a research study.”

Attachment XI provides a sample outline for a Data Management Plan.

Records Retention – Appropriate project records and accounts, including personnel records, must be maintained and made available for audit as prescribed by Federal and District regulations. University policy requires that all financial records be retained for a period of at least three (3) years after completion of a project or until an audit is completed and/or any litigation is resolved and all questions arising there from are resolved, whichever is later. In the event a sponsor requires a longer records retention period, the longer period applies. Records and supporting documentation must be sufficient for the D.C. Inspector General’s auditors or a certified independent auditor (one who is not an employee of the University).

Reporting – PIs and sub-grantees shall maintain data and information and submit reports in such form, at such times, and containing such information on project activities as required by UDC and/or the funding agency. Reports to agencies must be either submitted through OSP or OSP must be provided with a copy, depending on the requirements of the agency.

Publications - The PI/Originator is encouraged to publish the results of grant activity. Any publication (written, visual, Web, or sound) deriving from the project must provide acknowledgment of the sponsor’s support, citing a grant number, if appropriate, and also acknowledging the University of the District of Columbia, as the institution where the author is affiliated and the work was done. These acknowledgements must be included, even if the “first author” is from a different organization. Different sponsoring agencies have different desired citation format for works published based on projects they sponsor. Please check your sponsor’s requirements before publication.

Freedom of Information Act – Pursuant to the terms of the Freedom of Information Act, certain information documents, correspondence, data, publications, and other materials relating to a project shall be available for public inspection (<http://www.nih.gov/icd/od/foia/efoia.htm>).

Conflict of Interest – No PI, Co-PI, or project staff member is permitted to engage in activities which either present or have the potential to appear to a reasonable person to present a conflict of interest. A conflict of interest occurs whenever an individual or organization has an interest that might compromise or inappropriately influence their actions. There are four common types of conflict:

- Self-dealing, in which public and private interests collide, for example issues involving privately held business interests;
- Outside employment, in which the interests of one job might conflict with another;
- Family interests, in which one hires a spouse, child, or other close relative or purchases goods or services from such a relative or a firm controlled by a relative; and,
- Accepting gifts from friends, organizations, or individuals, who could be viewed as seeking influence, having an interest in the results of the project, or biasing one’s objectivity. (Such gifts may include non-tangible things of value such as transportation, lodging, or prestigious invitations.)

Disclosure is the first step in managing conflicts of interest. Thus, a potential conflict of interest related to work funded by sponsors must be reported in writing to the Director of OSP, as soon as it arises or in advance, if possible. Additional information may be requested to assist with review of the potential conflict, and a determination will be made in consultation with the Office of General Counsel on how it will be managed.

Discrimination – In the event a Federal or District Court or administrative agency makes a finding of discrimination after due process hearing on the grounds of race, color, religion, national origin, sex, sexual orientation, or disability against the PI, originator, or sub-grantee, the party upon whom the finding is made shall forward a copy of the finding to the University of the District of Columbia.

Nepotism – An individual cannot be hired as an employee or retained as a consultant for a project that is supervised by a close relative or domestic partner. In addition, immediate or extended family members of project personnel may not be hired to report directly or indirectly to their relative.

Intellectual Property – Intellectual property refers to creations of the mind, such as inventions; artistic and literary works; and names, images, or designs used in commerce. Under intellectual property law, owners are granted certain exclusive rights to such intangible intellectual assets. Intellectual property includes patents, copyrights, trademarks, and the concepts or works to which they are applied. Some information developed or provided by the University, its sponsors, or its partners, may be considered proprietary, not to be shared or released without permission from the owner. When sponsors fund projects at the University, they may impose intellectual property requirements on the University. The sponsor may require the PI and other participants in the research to sign confidentiality agreements, non-disclosure agreements, or intellectual property agreements. If these requirements are unsatisfactory to the University or to the PIs, the funds should not be accepted and the work should not be done by UDC. In situations where the University and/or the PI agree in writing to the sponsor's intellectual property, confidentiality, or non-disclosure agreements, these agreements supersede the University's policy and apply to the specific project and the work done by University faculty, staff, or students on this project, funded by the sponsor.

The University is in the process of developing its intellectual property policy. This policy is under review. Please contact the Office of General Counsel (OGC) at 202-274-5400 for further information.

Other Non-Fiscal Compliance Areas

Major Project Changes – Written approval must be obtained from the funding agency for major project changes. All major changes (Programmatic and Budgetary) must be coordinated with the Office of Sponsored Programs. Major changes include:

- Changes of substance in project activities;
- Changes in the principal investigator, co-investigator (where applicable), project director or other key personnel; and,

- Changes in the approved project budget, in excess of the flexibility allowed in OMB Circular A-21 or in the terms and conditions specified in the notice or referenced grant award.

If types of expenditures required for the project are not consistent with applicable UDC policy, it is essential to obtain from the sponsor specific documentation that these types of expenditures are appropriate for the project. For example, University travel policies may forbid reimbursement for lodging costs for “local travel” of less than 50 miles. However, for a grant, which funds student participation in a multi-day conference or professional development event within this distance, it is wise to obtain program officer approval in advance for the lodging costs for the students and accompanying faculty/staff. This documentation should be retained by the PI, with a copy provided to OSP and to OGA.

Project Extension – Requests for extension of a project must be submitted to the sponsor by OSP. The Project Extension Request Form, found in the Appendices, Attachment VIII, should be completed and submitted to the Director of OSP, with a copy to OGA, with the required signatures. No-cost extensions, in which additional time is requested to complete the project, but no additional funding would be required, are common and usually approved by the sponsor.

Hiring – When the grant requires hiring individuals into full- or part-time positions to work on the project, the same procedures are followed as would be followed to hire regular University employees. The employment term cannot exceed the duration of the grant. Funds must be available in the approved grant budget for the position. These employees are grant-funded employees. Depending on the grant conditions and budget, they may be provided with benefits, but the DCMR calls these employees “sponsored program personnel.” DCMR Chapter 17 describes their employment terms and conditions.

Travel – When a grant requires travel, the procedure to be followed is identical to the procedure followed for University-funded travel. In cases where the travel policies of the sponsor and the University are different, the most restrictive rules apply. Specific travel needs for a project that appear to be contrary to UDC’s or the sponsor’s general policies must be approved by the sponsor in writing (or email), and the documented approval must be provided to OSP and OGA for the grant’s records.

Purchasing – When the grant requires materials, supplies, equipment, or services, the University’s normal purchasing procedures must be followed. Items or services proposed to be purchased must be both within the scope of the project and a type of expense that is allowable by the sponsor and the University.

A PI can obtain a purchase card (P-card) to use for purchasing supplies and materials, if the grant budget includes funds for such purchases. Services, computers, food, and many other types of items may not be purchased using the P-card. Training is required, along with meticulous record keeping and prompt monthly reconciliation of the charges.

Subcontracts – To place a subcontract, the PI or Project Director must work with the Procurement Office in accordance with the University’s procurement policies. In some cases, the subcontractor or sub-awardee has been specified in the proposal. In other cases, it may be

necessary to place the subcontract using a competitive bidding process. A strong and written justification is required to limit eligibility to the preferred vendor. A Statement of Work must be provided, along with any special terms and conditions. The subcontract is not in place and the subcontractor is not permitted to start work until both the subcontractor and the University have signed the subcontract agreement.

The subcontract specifies the scope of work, cost, schedule, reporting required, and other terms and conditions, some of which may be “flow-down” conditions specified by the sponsor. The PI is responsible to inform the Procurement Office of any flow-down requirements. In some cases, the methods, procedures, facilities, and personnel will also be specified. The subcontractor must establish a separate account for the funds; ensure that funds received under the grant are not commingled with other organization funds, and satisfy all the conditions in the subcontract.

Once the subcontract is signed, the PI, Project Director, or individual the PI designates would serve as the Contracting Officer’s Technical Representative (COTR). This role is also known as the Contract Monitor. A UDC procurement official will serve as Contracting Officer. The COTR has specific important responsibilities related to overseeing the subcontractor’s work; assuring it is proceeding in accordance with the contract; monitoring progress; approving subcontractors in writing; communicating with the Contracting Officer in advance regarding subcontractors and possible changes; and officially accepting the products, services, or results on behalf of the University. Note that only the Contracting Officer is permitted to make changes to the scope of work, schedule, or other requirements. The COTR is not permitted to communicate such changes directly to the subcontractor, as they frequently have implications for the subcontract and possibly the price. Prior to the award of a contract, the designated COTR must sign a statement accepting and agreeing to the responsibilities.

Funds awarded via the subcontract can only be expended for the purposes and activities covered by the approved scope. The subcontractor or sub-awardee must obtain prior written approval from the UDC Contracting Officer, who works closely with the COTR, when major project changes might be needed. Unallowable or unsupported costs, as determined either by an on-site monitoring visit or official audit, must be refunded to UDC. Sub-award records shall be maintained for at least three years after the completion of a project or until an audit in progress at that time is completed, and all the questions rising there from are resolved.

Close-Out – The Principal Investigator must submit to OSP all final technical reports, patent reports, invention statements, equipment/property reports, and/or other non-financial statements or reports required by the sponsor at least 15 work days prior to the final report due date.

Financial Compliance

Introduction – The University is responsible for managing and administering grant resources ethically and in full compliance with the requirements and expectations of the sponsor. The University must exercise due diligence to prevent and detect possible criminal conduct (fraud, theft, embezzlement, etc.) and promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

The University of the District of Columbia is an independent agency of the District of Columbia government. As such, the University's financial managers and financial staff are employees of the Office of the Chief Financial Officer (OCFO) of the District of Columbia, assigned to the University. All financial support, processing, record-keeping, payments, collections, budgeting, financial reporting, and draw downs are performed by OCFO staff assigned to the University.

The University's fiscal year, like that of the DC government, begins October 1 and ends September 30 of the following calendar year. Financial policies and procedures followed by the financial staff are described in the *Financial Policies and Procedures Manual of the University of the District of Columbia Office of the Chief Financial Officer*. This Manual has a chapter on Grants Management, "to provide reasonable assurance that Federal awards are expended only for allowable activities and that the costs of goods and services charged to Federal awards are allowable and in accordance with the applicable cost principles." The Policies and Procedures document describes internal controls, designed to ensure compliance with program requirements and ensure that transactions are properly recorded and accounted for; transactions are executed in compliance with laws, regulations, and award requirements; and funds, property, and other assets are safeguarded against loss from unauthorized use or disposition. This PI Handbook does not reproduce the *Financial Policies and Procedures Manual*, but summarizes some important financial requirements, responsibilities, policies, and procedures that PIs need to know about and follow.

Commitment of University Resources – Commitments of University resources, including grant funds, can only be made by administrative authority designated by the President of the University. **No other employee (i.e. PI, co-PI, full or part-time faculty, staff, senior researcher, and/or administrator) has the authority to commit University resources.** Commitment of University resources includes such actions as payment for unapproved expenditures, unapproved promise of time and effort or a position, negotiating outside of the policy stated above, and any other unauthorized action related to expenditures for the grant, contract, or agreement.

Equipment Identification and Management – The University is responsible for taking proper care of equipment purchased with grant funds. The U.S. Office of Management and Budget Circular on "Grants and Agreements with Institutions of Higher Education" (A-110) contains requirements on the management of equipment purchased with grant funds by recipients of Federal financial assistance. These requirements are as follows:

- (1) Each item of equipment must be properly identified;
- (2) A physical inventory to verify that recorded equipment exists and is usable or listed as surplus must be conducted at least every two (2) years;
- (3) Equipment must be kept in good condition, and appropriate safeguards must be in place to prevent loss, damage, and/or theft; and
- (4) Proper "loaned" or purchased project equipment reports must be filed with the assigned Federal contract administration offices for equipment support by the U.S. Department of Defense (DOD).

The Office of Grant Administration is responsible for providing assistance in the preparation of "loaned/purchased equipment" reports and serves as the transmitting office for such reports.

Time-and-Effort Documentation – The PI/Originator is responsible for preparing and submitting Time-and-Effort Reports for each employee who receives a full or partial salary or wages from a grant, MOU, cooperative agreement or contract from the federal government. The existing “Time and Attendance” reports used by payroll do not currently capture the necessary information to satisfy this requirement. This report must account for 100% of the individual’s total time or effort for all compensation received from the University, and indicate how much was devoted to each project or activity.

“Employees” for whom effort documentation is required include student workers, administrative professionals, faculty and staff who work or otherwise expend time and effort that benefits the project. This requirement also applies to projects funded by a non-federal sponsor if that sponsor’s funding came from a federal grant (i.e., pass through funds). Effort reports are required even if no salary is funded in the grant or contract.

An After-the-Fact Effort Report (Form TE-1, Attachment V) must be completed and certified (by the employee, the PI, and the PI’s manager or department chair or Dean) at least once per academic term (fall, spring, and summer) for each University employee working on a federally sponsored project. The reports must be submitted to the Office of Sponsored Programs for review and record-keeping. After-the-fact effort reports are due by January 15th (Fall Term), June 1 (Spring Term), and September 1 (Summer Term).

There are serious consequences of failure to comply with the time-and-effort reporting policy, because the University will have inadequate documentation to provide evidence that the person worked on the project that paid his or her salary. If the periodic effort reports are not completed, certified, or submitted properly and in a timely manner, the Office of Sponsored Programs will work with the Associate Provost for Research, OGA, and the Vice President of the unit involved take action to ensure compliance with Federal requirements. These actions may include, but are not limited to:

1. Placing active projects/awards ‘on hold,’
2. Adjusting uncertified labor distributions and the effort they represent to non-sponsored accounts as *cost share*.
3. Barring non-compliant individuals from serving as a Principal Investigators, and non-compliant units from submitting or administering Federal grants or contracts.

Please see Appendix V for a copy of the Time and Effort Reporting form.

Expenditures – Funds are to be expended only for the purposes and activities covered by the approved project application and budget and in accordance with the cost principles delineated in the U.S. Office of Management and Budget Circular (OMB-A21, *Cost Principles for Educational Institutions*). The fiscal administration of funds shall conform to the Generally Accepted Accounting Principles (GAAP). Funds may not be expended for:

- Items not part of the approved budget;

- Purchase or construction of land or buildings or improvements thereon, unless specified as an approved part of the project;
- Dues to organizations or federations;
- Decorations; and
- Purchase of automobile(s) or other automotive vehicles, unless provided for in the award agreement.

The value of project expenditures shall be based on actual costs incurred and shall be supported by detailed documentation (voucher, receipts, invoices, etc.). Bills, invoices, or receipts must support all project expenditures (checks and cash). This applies to petty cash, miscellaneous office expenditures, purchase card, and all other expenditures. Financial offices are responsible for maintaining these documents. PIs are urged to keep local backup copies of these documents.

The District of Columbia shall make payment(s) on invoiced amounts in accordance with the approved budget and the method cited above.

All unallowable or unsupported costs, as determined either by on-site monitoring or official audit, are to be refunded to UDC and to the sponsor.

Under no circumstances shall the PI, Project Director, Originator, or sub-grantee expend funds or approve the expenditure of funds beyond the amount stipulated in the award agreement.

Cost Sharing – The University is obligated, when committing to cost sharing, to ensure that at least the promised amount of in-kind or cash support is provided and documented. When a component of the cost sharing comes from “in-kind” labor, the PI or his/her designee is required to document and confirm cost sharing effort using the Time-and-Effort reporting form (Appendix V). The Office of Grant Administration will prescribe the method to facilitate the accounting of cost sharing, both effort and other cash and “in-kind” contributions. Both mandatory and voluntary cost sharing must be accounted accurately and thoroughly during the conduct of the project. OGA will also keep track of cost sharing and generate cost sharing reports required by the sponsor. OSP will review and assure institutional approval of cost sharing committed in proposals, and will monitor cost sharing provided during the project.

Records related to cost sharing must be retained for the period of time prescribed under the University’s record retention policy or the sponsoring agency’s, whichever is longer.

Program Income – Federal sponsoring agencies require recipient organizations to account for program income related to programs that are funded wholly or partially utilizing federal funds. Program income usually takes the form of earnings on service fees, sale of commodities, rental and other user fees, royalties on patents and copyrights, proceeds from sales of real property and interest earned on fund advances. In some instances, program income may be used to finance the non-Federal share of a grant program, if it is approved in advance by the Federal sponsoring agency. In instances where program income is unapproved, the income may be deducted, by the sponsoring agency, from the total program costs when it determines the net costs on which the Federal share of costs is based. Any interest earned on advances of Federal funds or profit from

the sale of real property must be remitted to the sponsoring agency unless provided otherwise under the Intergovernmental Cooperation Act of 1968 (Public Law 90-577.)

Budget Revisions – If it is desired to use funding in different ways than originally planned, it may be necessary to “reprogram” the budget. In this case, the PI/Project Director/Originator, as applicable, must provide to OSP a written, detailed justification describing the nature and purpose of the request and its impact on the project goals and objectives along with a revised budget on the Spending Plan Form required by OGA to set up the budget. In the case of budget revisions that require the approval of the sponsor, OSP will assist the PI in obtaining this approval prior to making the changes requested. In cases where the budget revisions are within the flexibility provided to UDC by the sponsor, OSP will assist the PI in working with OGA to modify the project budget/spending plan accordingly.

Close Out – Direct cost expenditures incurred after the end date will not be allowed, unless an extension of time has been approved in writing by the sponsor. Official electronic forms of approval associated with e-business are recognized by UDC as equivalent to the traditional letter. The Office of Grant Administration will work with the PI to complete reconciliation of the account. The award account will be monitored for the following criteria:

- Account budget, expenditures, and payments are equal;
- Open encumbrances and balance available on the account are zero; and,
- All payments have been received.

Upon meeting the above criteria, the account will be closed to ensure no further activity occurs.

The Principal Investigator must submit to OSP all final technical reports, patent reports, invention statements, equipment/property reports, and/or other non-financial statements or reports required by the sponsor at least 15 work days prior to the final report due date. Project-related technical records and financial documentation must be retained for a period of at least 3 years beyond the date of submission of the Final technical report and financial statement, whichever is later. If an audit is in progress at this time, the documentation must be retained until 3 years after the audit or litigation is completed.

University policy requires that all project-related financial records be retained for a period of at least three (3) years after completion of a project or until an audit is completed and any litigation is resolved and all questions arising there from are resolved, whichever is later. These records and supporting documentation must be sufficient for the D.C. Inspector General’s auditors or a certified independent auditor (one who is not an employee of the University or the District of Columbia) to review and validate.

Other Important Spending-Related Post Award Topics

Personnel Management – The University is responsible for personnel management. The same human resource policies, benefits policies, compensation policies, and salary scales apply to grant-funded personnel as apply to regular personnel. However, grant-funded personnel cannot occupy “permanent” positions or positions with unspecified termination dates.

Individuals are permitted to be partially funded by a grant and partially funded through appropriated or other University funds. Individuals in regular positions can elect to join grant-funded projects without losing their seniority or regular employment status. If the movement to the grant involves a change in position level or salary, when the individual returned to the regular position, the salary would be rolled back to what it would have been, had the person stayed in the regular position for the period.

Compensation of Faculty on Grants – The Office of Management and Budget has issued Circular A-21, defining the Federal cost reimbursement rules for educational institutions. The following five principles underpin compensation policies and procedures.

1. The University is responsible for setting and administering compensation.
2. Compensation policies must be consistent and administered consistently.
3. The University's compensation system must comply with law and regulation.
4. Compensation from Federal sources must comply with OMB Circular A-21 "Cost Principles for Educational Institutions."
5. A compensation system, which has different rules for compensation derived from different sources, is neither consistent, nor compliant with Federal rules, which require the use of Federal funds to be the same as the use of institutional funds.

Consistent with these principles, the University's faculty-compensation policy, described below, applies to faculty compensation from grants and contracts regardless of funding source, and it complies with Circular A-21. In no case, can the interpretation of the faculty collective bargaining agreement require the University to compensate faculty members using Federal grant funds in a manner that is not compliant with Circular A-21. The applicable section of Circular A-21 (2004) is reproduced in Attachment IX.

The collective bargaining agreement defines the compensation policies for faculty members, including the workload and conditions under which a faculty member would be entitled to overload pay. Since overload makes extra demands on a faculty member's time and attention, it can limit the faculty member's ability to do a quality job in all respects. Thus, the University strives to minimize overload assignments. The workload normally consists of a combination of teaching, research/scholarly pursuits, and service. If the teaching assignment is not reduced proportionately for a faculty member working on a sponsored project to which the University has committed a portion of the faculty member's effort, then the teaching assignment may put the faculty member in an overload situation. In this case, appropriate overload compensation would be paid to the faculty member from the departmental budget, in the same manner and amount as if the workload and overload were all due to teaching. In no case may the overload assigned to a faculty member with teaching release to work on a sponsored project exceed 25 percent. Any overload in excess of this amount would unacceptably compromise the faculty member's ability to do a quality job on all teaching, research/scholarship, and service obligations.

When a faculty member's responsibilities during the academic year include work on a sponsored project, University policy is that the sponsored project's budget must pay for the portion of the faculty member's effort to be dedicated to the project. This effort is included in the workload assignment. The grant budget must pay the indicated proportion of the salary plus the associated

proportion of fringe benefits. The teaching assignment for that faculty member would be reduced proportionally, such that the member has a full workload assignment.

Example 1: A faculty member has a 9-month base salary of \$60,000 and her normal workload is to teach four courses (12 credit hours) plus do some research and service. However, she is committed to work 25% on a sponsored project. The project's budget would include \$15,000 to cover the 25% of her academic year salary and an additional amount to cover the associated benefits. The teaching assignment for the faculty member would be reduced to three courses (9 credit hours) per term. If the project is to be conducted in only one of the terms, then the salary cost to the grant would be only \$7,500, and the teaching assignment would be reduced only for that term. The associated benefits amount would also be paid by the project. The normal paperwork (Form 52) is used to cause the grant to be charged for the salary and benefits. The net result in the first case, would be that the faculty member would receive her \$60,000 salary, of which \$45,000 would come from the department's budget and \$15,000 would come from the grant budget, with benefits apportioned in the same manner.

Any effort of a faculty member on a sponsored project that is not paid for by the project is an "in-kind" match or cost share. Note that **approval for release time, whether paid for by the project or supported "in kind" by the University, must be obtained from the faculty member's department head and dean at the time a proposal is developed and submitted**, documented on the OSP Proposal Routing Form (Attachment II in the Appendices). It will be verified by OSP as part of the review and clearance process that must be followed before the proposal can be submitted.

The typical faculty member's contract and base salary only covers the 9-month academic year (August 16 through May 15). It is normal for faculty members with funded projects to work full time on them during the summer. The sponsored project must pay the full salary cost and benefits for this effort. Since the summer period (May 16 through August 15) is 3 months long, the maximum compensation a faculty member may receive from all University sources for working full time during this period is limited to one third ($3/9^{\text{th}}$) of the base salary for the academic year just completed. (Some agencies, such as the National Science Foundation, limit the summer compensation from their grants to $2/9$ of the base salary; however the total summer compensation limit from all sources is still 33.3% of the base salary.)

Example 2: A faculty member has a 9-month base salary of \$60,000. Her maximum summer compensation from all sources is \$20,000 (33.3% of the base salary). She will be working on a sponsored project full time during the summer, and the project can budget to pay her a salary of \$20,000 for this work. If, however, she accepts an assignment to teach one summer session course for \$4,000, the sponsored project could only pay her \$16,000, otherwise the total summer compensation would exceed the limit. If the project is sponsored by the NSF (2 months limit on summer compensation), however, she could be paid $2/9$ of her base salary from the project (\$13,333), and would be allowed to add summer teaching payment to bring her summer compensation total to \$17,333. Fringe benefits would also be charged to the project, at the very low part time rate.

Compensation of 12-month faculty or personnel in administrative appointments on sponsored projects – For 12-month faculty or personnel in 12-month administrative appointments, the base annual compensation is their annual salary. The portion of their effort that is dedicated to the sponsored project would be paid from the project budget, along with the associated benefits. Only under highly unusual circumstances would 12-month salaried personnel be paid above their salary level, and the sponsor would need to approve such payments in advance. Such

circumstances could include, for example, intensive 7-day per week summer programs of limited duration, where regular weekend and/or overnight duties are required and there is no compensatory adjustment of other responsibilities. The associated fringe benefits would be paid at the rate applied to faculty summer salary and part-time workers.

Compensation of hourly workers (non-exempt) subject to overtime/holiday premiums – When hourly (non-exempt) personnel are assigned to work on grants, their compensation is determined by their contract and the total number of hours they work in a specific week. Sponsored project budgets would be charged for time at the worker's established hourly wage rate (or overtime/holiday rate, if these conditions apply), with accompanying payments for the fringe benefits.

Direct Costs – OMB Circular A-21 Section D defines direct costs as *those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct costs or F&A costs. Where an institution treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution.*

Indirect or Facilities and Administrative (F&A) Costs – OMB Circular A-21 Section E defines F&A costs as costs *that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity.* According to Section F.1, F&A costs include *broad categories of costs. "Facilities" is defined as depreciation and use allowances, interest on debt associated with certain buildings, equipment and capital improvements, operation and maintenance expenses, and library expenses. "Administration" is defined as general administration and general expenses, departmental administration, sponsored projects administration, student administration and services, and all other types of expenditures not listed specifically under one of the subcategories of Facilities (including cross allocations from other pools).*

Negotiated Indirect Cost Agreement – The Department of Health and Human Services is the Federal agency that negotiates and approves the University's indirect cost rate. The most recent agreement is dated September 20, 2007. The Agreement is provided as Attachment X. It is in effect through September 30, 2011, with provisional approval to continue the same rates until the agreement is formally amended and signed. It is based on detailed information and analysis provided by the University in accordance with detailed instructions set forth in OMB Circular A-21.

Based on this analysis, the Department of Health and Human Services has approved an indirect cost rate of 46% for on-campus projects and 22% for off-campus projects. A project is categorized as on- or off-campus, depending on the location of the majority (over 50%) of the activities. Indirect costs are calculated at the indicated percentage of modified total direct costs

(MTDC), which include all costs, except equipment, tuition payments, participant costs, and subcontract amounts above \$25,000 per subcontract. In accordance with OMB Circular A-21 Section G.7.a, the indirect cost rate in effect at the time a grant award is made will apply to that grant for its approved duration.

The approved indirect cost rate applies to projects sponsored by any Federal agency, and it has been set to cover the added costs of facilities and administrative services attributable to sponsored projects. Private, state, and local sponsors and certain Federal grant programs that include a lot of funding for student support or tuition often specify a reduced indirect cost rate. However, Federal sponsors do not in any way subsidize the F&A costs of other sponsors, specifically industry and foreign governments, and the University must describe how it ensures that Federal funds do not subsidize such work.

Allowability of Costs – OMB Circular A-21 Section J lists and describes 54 principles to be applied in establishing the allowability of certain costs. These principles apply whether the costs would be direct costs or indirect costs. The Federal government will not reimburse the University for costs that are not allowable, therefore PIs and other project personnel must not incur and expect to be reimbursed for costs that are not allowable.

Examples of unallowable costs include, alcoholic beverages, alumni activities, bad debts, personal use of automobiles, social activities, most costs associated with legal proceedings, donations given or received, entertainment, fines and penalties, costs of fundraising or investment advisors, lobbying, memberships in civic or community organization or country club or social organization, costs incurred prior to the effective date of the grant unless approved in advance by the sponsoring agency, and costs for student activities (unless specifically allowed in the grant). Moreover, there are tight limits on the type of marketing, public relations, and patenting costs that can be covered. Proposal costs can only be covered as F&A (indirect) costs. This list presents only examples, and it cannot be assumed that if an item is not presented here, its cost is allowable. For additional information, consult with OSP or GA staff or refer to OMB Circular A-21.

Use of Indirect Costs – Indirect revenues are University funds, with some restrictions on how they can be spent. They are intended to reimburse the University for facilities, maintenance, and administrative costs that are necessary for supporting the sponsored work, such as library assets, facilities modifications or upgrades, equipment purchase and maintenance, costs of sponsored-programs administration, and general administrative and support costs at the department, school/college or University level. The University has established its indirect cost distribution policies. Cost accounting principles do not allow indirect costs to be used as direct supplements to funded projects. They must not be mingled with direct costs or other funds, such that auditors cannot ascertain that they have been spent in acceptable ways. The principles of allowability in OMB Circular A-21 and summarized in the paragraphs immediately above apply to indirect and direct costs, alike.

GLOSSARY

AOR – Authorized Organization Representative, the person or persons designated by the institution as authorized to submit proposals and interact with the sponsor on behalf of the organization. Principal Investigators are not AORs, and they cannot represent UDC on behalf of their own proposals.

Application – A set of specific forms and documents for a specific funding opportunity which are used to apply for a grant.

Application Template – One or more forms and documents which can be reused for multiple opportunity-specific application packages.

Authorized Organization Representative (AOR) - Person authorized to submit a grant of the institution and sign applications, required certifications and assurances necessary to fulfill requirements of the application process. The University's AORs are personnel in the Office of Sponsored Programs.

Award – The document that provides financial assistance and governs the purpose, direction, implementation of a project.

Carryover Funding – Funding remaining at the conclusion of one project year and able to be used during the next project year.

Catalog of Federal Domestic Assistance (CFDA) – An online database of all federal programs available to governmental entities, profit and Non-profit organizations, institutions and individuals.

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

Central Contractor Registry (CCR) – The CCR is a government-wide registry for organizations that seek to do business with the federal government. The CCR collects, validates, stores and disseminates data to support a variety of federal initiatives. The University is the registrant in the CCR. Individual grantseekers do not need to register.

Close-out – Process by which the awarding agency determines that all applicable administrative actions and all required work of the award have been completed by the recipient and the awarding agency, all documentation both technical and financial is complete, and the project is over.

Competition ID – A grantor-selected ID that allows further distinction of the funding opportunity and applications with the same funding opportunity number to be assigned unique identifiers.

Congressional District – The Congressional district where the University is located; DC Congressional District 1.

Contract – An agreement between two parties in which one party agrees to provide specific property or specific goods or services on the specified schedule and at the specified price to the other party.

Cooperative Agreement – A cooperative agreement is a financial assistance mechanism that provides for substantial involvement between the sponsor and the grantee organization in carrying out the activity contemplated by the award.

Community Partnership – A community partnership is an award involving equal participation by the recipient and community entities in the development of a specified activity.

Cost-Reimbursement – Reimbursement of allowable costs in the performance of a contract.

Cost Sharing or Matching – The value of third party in-kind contributions and the portion of the costs of a federally assisted project or program not borne by the Federal Government. Matching or cost-sharing may be required by law, regulation or administrative decision of the sponsor. Costs used to satisfy matching or cost-sharing requirements are subject to the same policies government allowability as other costs under the approved budget.

Data Universal Numbering System (DUNS) – A unique nine-character identification number provided for the University by the commercial company, Dun & Bradstreet.

Date of Completion – The date upon which all work regarding a specific project or program is to be completed and award sponsorship ends as specified in the award document or supplemental documents.

Disallowed Costs – Charges that the sponsor determines to be unallowable in accordance with cost principles or other terms and conditions contained in the award.

E-Biz-POC – An E-Business Point of Contact identified as responsible for the submission of an application through grants.gov and for the administration and management of the grant activities.

Entitlement – A government program that guarantees and provides benefits to a particular group.

Employer Identification Number (EIN) – An identification number assigned to an entity by the federal government. The EIN for the University of the District of Columbia can be obtained through the Office of Sponsored Programs, and it is listed in the Fact Sheet (Attachment I).

Equipment – The definition for equipment, as stated in Circular A-110, is tangible nonexpendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of \$5000 or more per unit. However, consistent with recipient policy, lower limits may be established.

Excess Property – Property under the control of an awarding agency that as determined by the agency is no longer required for the agency's need or the discharge of its responsibilities.

Exempt Property – Tangible personal property acquired in whole or part with funds that provide for the sponsor's statutory authority to vest title in the recipient without further obligation to the agency.

Fastlane.gov – The secure e-business portal for the National Science Foundation, which allows proposals to be created by PIs and submitted by Authorized Organizational Representative, progress, final, and financial reports to be submitted, reviews to be obtained when available, and proposal processing to be tracked.

Federal Share – The percentage of cost and any expenditure by the federal agency.

Funding Opportunity Announcement – A publicly available document by which a federal agency makes known its intentions to award discretionary grants or cooperative agreements, usually as a result of competition for funds.

Funding Opportunity Number – The number that a federal agency assigns to its grant or cooperative agreement announcement.

Funding/Grant Period – The period of time for funding availability to the recipient.

Grant – A financial assistance award to develop a project or program.

Grants.gov – A web portal that publicizes announcements of grant opportunities from all Federal agencies. Also, an e-portal for grant submission and used in electronic collection of data, forms, and reports for Federal grant-making agencies. (www.grants.gov).

In-kind Contributions – The value of goods and services directly benefiting and specifically identified for a particular project or program as a part of cost-sharing or matching.

Interagency Agreement – A document delineating all aspects of understanding related to a project or program between and among partnering agencies.

Intangible Property – Term referring to trademarks, copyrights, patents, and patent applications.

Line Item Transfer – A request to transfer funds from one budget category to another within the approved guidelines.

Matching Funds – Interchangeable term for cost-sharing.

Memorandum of Agreement (MOA) – A document that delineates the responsibilities and areas of program and fiscal accountability of all partners in the development and implementation, of a project or program.

Memoranda of Understanding (MOU) – Term which is used interchangeably with Memorandum of Agreement.

No-Cost Extension – A mechanism for extending the time period for a grant without any additional funding being provided by the sponsoring agency.

NOGA – Notice of Grant Award

OGA – UDC Office of Grant Administration

OGC – UDC Office of Grant Counsel

OSP – UDC Office of Sponsored Programs

PI (Principal Investigator) – Faculty or staff member, who is ultimately responsible for grant or agreement development, implementation, management, and administration from concept to close-out.

Proposal – A document written in response to a grant announcement or as an unsolicited submission containing a narrative that contains a research methodology, justification, budget and other information as requested by the grantor.

Research.gov – a federal government web portal providing access to NSF, NASA, and some other federal agency information about grant opportunities and awards.

Solicited Proposal – A document that responds to a formal solicitation or request for proposal.

Sponsor - The funding entity or entity providing the money.

Sub-Award – An award of financial assistance made under an award by a recipient to an eligible sub-recipient.

Sub-recipient – The legal entity to which a sub-award is made, and which is accountable to the recipient for use of the funds provided.

Supplies – As stated in Circular A-110, **supplies** means all personal property excluding equipment, intangible property, and debt instruments as defined in this section, and inventions of a contractor conceived or first actually reduced to practice in the performance of work under a funding agreement ("subject inventions"), as defined in 37 CFR part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements."

Suspension – A post-award action by the sponsor that temporarily withdraws the financial assistance or sponsorship under an award, pending corrective action by the recipient or pending a decision to terminate the award.

Trading Partner Identification Number (TPIN) - The restricted identification number assigned by Central Contract Registry (CCR) to the Point of Contact who manages information for the CCR registrant.

Trademark – Marks, pictures, letters, or name used to distinguish an entity from other entities that is approved via governmental application.

Unobligated Balance – The portion of funds authorized by an awarding entity that has not been obligated by the recipient and is determined by subtracting the cumulative obligations from the cumulative funds authorized,

Unsolicited Proposal – A proposal submitted to a funding source that has not published an official solicitation or request for proposal.

ATTACHMENTS

- I. UDC Institutional Fact Sheet**
- II. OSP Proposal Routing Form and Instructions**
- III. Proposal Development Technical Assistance Form**
- IV. Registration Request for Prospective Principal Investigator**
- V. Time and Effort Reporting Form**
- VI. Request for Pre-Award Expenditures**
- VII. Project Extension Request Form**
- VIII. OMB Circular A-21 Excerpt on Personal Services, Faculty Compensation**
- IX. Negotiated Indirect Cost Reimbursement Agreement**
- X. Application for Approval to Use Human Participants**
- XI. Sample Data Management Plan**


NOTE: Forms included in these appendices are provided as a courtesy. Please check the OSP website (<http://www.udc.edu/osp>) and use the latest version.

ATTACHMENT I: UDC Institutional Facts Sheet
(For faculty/staff use in writing proposals)

University of the District of Columbia
Fact Sheet for Grant Applications
October 2011

Applicant Organization Name and Address	University of the District of Columbia 4200 Connecticut Avenue, Washington, DC 20008
Tax ID (TIN) also known as EIN (Employer Identification Number)	The tax payer Identification Number (TIN/EIN) is the number companies use for income tax purposes. It is also known as Employer Identification Number and Federal Identification Number. TAX ID number: 53-6001131
DUNS Number	The Data Universal Numbering System (DUNS) number is a unique, nine-character industry-standard and government-wide company identifier code. DUNS Number for the National Science Foundation: 038994133 DUNS Number for Grants.gov & other federal agencies: 137460275
SIC Code	Standard Industrial Classification (SIC) The Standard Industrial Classification (SIC) coding system identifies the type of activity your business performs and the type of product or services you offer. SIC Code: 8221 (Colleges and Universities)
CAGE Number	4FGH2
Human Subjects Assurance Number	FWA 00013788; Institutional Review Board Chair: Dr. Angelyn Flowers
Number of Employees (Faculty and Staff, Including Law School)	About 1000
Type of Organization and Business Type	Public *Educational Institution *Nonprofit Institution *Historically Black College/University (HBCU)
Congressional District	DC-001, the 1st Congressional District
HUB Zone and Census Tract	4200 Connecticut Avenue NW, Washington, DC 20008 Census Tract Number: 12, Ward 3
Chief Financial Officer	Ibrahim H. Koroma 4200 Connecticut Avenue, Washington, DC 20008 (202)274-5415; E-mail Address: ikoroma@udc.edu
Name of Official Signing Applicant Organization	Graeme Baxter, Provost and Vice President for Academic Affairs 4200 Connecticut Avenue, Washington, DC 20008 Telephone: (202) 274-7075; E-mail Address: bhartine@udc.edu
Indirect Costs	Indirect charges are applied at the agreed upon rate to Modified Total Direct Costs (MTDC) incurred under the sponsored agreement. Indirect cost rate is 46% for on-campus projects Indirect cost rate is 22% for off-campus projects DHHS is our approval agency. Date of current agreement: Sept. 20, 2007
For More Details and Administrative Official	JoVita Wells J.D., Director, Sponsored Programs, 202-274-6260; Email: jowells@udc.edu

ATTACHMENT II: OSP Proposal Routing Form and Instructions

	<h2 style="margin: 0;">University of the District of Columbia</h2>	<h3 style="margin: 0;">Office of Sponsored Programs Proposal Routing Form</h3>
<p> Proposal No. _____ Proposal Type _____ Date _____ Phone# _____ Department(s) _____ College/Area(s): _____ Email: _____ Fax: _____ Principal Investigator(s) _____ Sponsor _____ CFDA: _____ Project Title _____ Project Period From _____ To _____ <small style="display: flex; justify-content: space-around; width: 100%;"> Month/Day Year Month/Day Year </small> </p>		
<p> Proposal Status (Please check as appropriate) <input type="checkbox"/> New Project <input type="checkbox"/> Renewal <input type="checkbox"/> Continuation <input type="checkbox"/> Extension <input type="checkbox"/> Supplement Total Project Cost: \$ _____ First Year: \$ _____ Additional Years: \$ _____ Indirect Cost: \$ _____ Percentage % _____ <input type="checkbox"/> 48% of Modified Total Direct Costs <input type="checkbox"/> Other: explain Matching Funds <input type="checkbox"/> None <input type="checkbox"/> In-Kind (Facilities/Services) Amt. \$ _____ <input type="checkbox"/> Cash Amt \$ _____ Present Account Code (if applic.) _____ Sponsor's Deadline _____ <small style="display: block; margin-left: 500px;">Month/Day/Year</small> </p>		
Principal Investigator/Program Director's Statement		
1. Does the proposal involve human subjects? If yes, attach IRB approval or explain.	<input type="checkbox"/>	<input type="checkbox"/>
2. Will animals be required? If yes, attach approved protocol and/or explanation.	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the proposal involve DNA techniques, radioactive materials, hazardous chemical waste, biohazardous material or infectious agents? If yes, send copy of abstract to University Wide Safety Committee.	<input type="checkbox"/>	<input type="checkbox"/>
4. Is adequate space already assigned for the proposed program? If no, submit explanation to the Chairperson/Dean.	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the project provide for a new academic degree program and/or new courses?	<input type="checkbox"/>	<input type="checkbox"/>
6. Has faculty signed a University patent agreement? If no or uncertain, contact the Director of the Office of Sponsored Programs.	<input type="checkbox"/>	<input type="checkbox"/>
7. Is any proposed project personnel presently debarred, suspended or proposed for debarment by any Federal agency? If yes, proposal should contain explanation for each such person.	<input type="checkbox"/>	<input type="checkbox"/>
8. Will project require, as a condition of acceptance, that the University absorb the services should project funds be reduced or terminated? If yes, please explain so that approval may be obtained in advance.	<input type="checkbox"/>	<input type="checkbox"/>
9. Is there any out year commitment required or expected?	<input type="checkbox"/>	<input type="checkbox"/>
Signature _____		Date _____
<p>Statement of the Department Head and Dean or VP. This proposal is consistent with the educational and research objectives of the Department and University. I endorse its submission, and agree:</p> <ol style="list-style-type: none"> 1. To abide by the approved budget as it relates to faculty and staff personnel 2. That cost sharing, if proposed, is reasonable and appropriate for this program and available in my budget. 3. That adequate space will be made available for the proposed program 		
Chair or Dept Head's Name _____	Signature _____	Date _____
Dean's or VP's Name _____	Signature _____	Date _____
Director Office Spons. Programs _____	Signature _____	Date _____
FOR Agreements to be funded immediately:		
General Counsel: _____	Date: _____	Other: _____ Date _____
Chief Financial Officer* _____	Other: _____	Date _____
Director of Grant Administration _____	Signature _____	Date _____
For ALL:		
Provost _____	Signature _____	Date _____
<p>Proposals must arrive at the Office of Sponsored Programs a minimum of seven (7) working days prior to the desired submission date.</p>		



1. Explanations of items from page 1. Add continuation page if needed

2. Faculty release time: Provide the names and departments of any faculty members for whom release time is requested. Indicate the amount of release time per academic year. List the amount of funds (\$) requested in this grant for release (salary and benefits) for the first year and the total grant.

FACULTY MEMBER'S NAME	DEPT	Release/YR	\$ Requested for release salary yr 1	\$ Requested for release benefits yr 1	\$ Requested for release salary total	\$ Requested for release benefits total

If more than four faculty are involved, please check here and include a continuation page.

As Department Chair/Dean, I approve the proposed release, and agree to support any committed release not funded through the grant, using resources of my department/school/college.

Department _____	Chairperson: _____	Signature _____	Date _____
Department _____	Chairperson: _____	Signature _____	Date _____
Department _____	Chairperson: _____	Signature _____	Date _____
Department _____	Chairperson: _____	Signature _____	Date _____
College/School _____	Dean _____	Signature _____	Date _____
College/School _____	Dean _____	Signature _____	Date _____
College/School _____	Dean _____	Signature _____	Date _____

3. Complete this section, if in-kind or cash matching is requested:

Is matching required by the sponsor? Yes No If yes, how much is required? _____

How do you know? _____

How much cash match is requested? _____ From what budget(s) will the match be provided? _____

Approval of person responsible for the budget? Name: _____ Signature _____

How much in-kind match is requested (describe) _____

Availability and commitment of in-kind and cash match has been verified.

Dean of Graduate Studies & Research: _____ Date: _____

4. If "Yes" to Question 9, please describe outyear commitment and plan to fulfill it.

This Routing Form Instructions document must be completed for all proposals submitted to external funding entities. The form is also used to route proposals for on-campus signatures.

All forms and a copy of the application and budget are due to the Office of Sponsored Programs at least 7 working days prior to the due date for the grant.

These instructions will help you (the PI) complete the Office of Sponsored Programs' Proposal Routing Form (PRF). The instructions follow the order of information as it appears on the Proposal Routing Form. The PI is responsible for completing the form and transmitting it and a copy of the proposal, including budget and other applicable forms, to his/her chair and/or dean for review and approval prior to the form and supporting documents arrival at the Office of Sponsored Programs.

- Proposal No.:** Enter the Proposal's ID Number assigned by the sponsoring agency.
- Proposal Type:** Select the type of proposal (Federal Grant, Intra-district Agreement, Contract, Cooperative Agreement, Memorandum of Agreement, Memorandum of Understanding, Private Foundation Grant, Sub-award, Other)
- Date:** Enter the date the grant application was submitted to the Office of Sponsored Programs for review.
- Phone #:** Enter the telephone number(s) of the Principal Investigator(s)/Co-PI(s)
- Department(s):** Enter the name of the academic department that will administer the grant.
- College/School:** Enter the name of the **College/School** where the Academic Department is located.
- Email:** Enter the PI Contact Email
- Fax:** Enter the PI Contact Fax
- Principal/Co-PI Investigator(s):** Enter the name(s) of the Principal Investigator(s) (PIs) – The initiator(s) and director(s) of the proposed project.
Enter the name(s) of the Co-Principal Investigator(s) (Co-PI), if any.
- Sponsor:** Enter the name of the sponsor – the immediate source of external funds. This is the entity with whom UDC would enter into a contract if the proposal is funded. This could be the Federal Agency, the Private Foundation or other funding source.

CFDA: Code of Federal Domestic Assistance Number (CFDA). Enter the Code Number indicating the program of federal assistance assigned by the Federal agencies.

Project Title: Enter the complete title of the project.

Project Period: Enter the beginning and ending dates of the entire project, beginning with the first day the award is expected and ending with the last day of the project. Thus, if a three-year award is made on October 1, 1994, the project period will be 10/1/94 through 9/30/97.

Proposal Status (Please check as appropriate):

New Project: A new request for funding that includes a full, detailed proposal. This category includes new projects, full submissions in response to pre-proposals, resubmissions of previously non-funded proposals, and funding requests for existing projects submitted to a new sponsor.

Renewal: A request to the same sponsor for continuation of funding for an existing project that does not change its fundamental scope. Often used for projects awarded incrementally.

Continuation: A request for funding to renew, by one or more additional budget periods, an existing funded project that would otherwise expire.

Extension: Indicate reason:

Supplement: A request to the same sponsor for additional funding for an existing project for activity that is beyond the scope originally proposed.

Total Project Cost: Enter the sum of direct and indirect costs for the entire Project Period (all years).

Indirect Cost: Costs which are not directly charged to a project but are associated with the cost of doing research, training or other sponsored activities (e.g., costs for general operations such as utilities, building operations, library services, purchasing, etc.).

Enter the total amount of indirect costs budgeted for the entire Project Period (all years) \$ _____

Enter Percentage % amount \$ _____

Enter 46% of Modified Total Direct Costs \$ _____

Other: Please explain.

Matching Funds: Indicate whether or not the application requires that the University provide matching funds or financial support for this project. If matching funds are required, enter the amount of that support. If not, check “None.”

Enter In-Kind (Facilities/Services) amount.

Enter Cash Amount, if any.

Present Account Code (if applicable):

Sponsor’s Deadline: Date by which the proposal must be received by the sponsor. Enter Month/Day/Year.

Principal Investigator/Program Director’s Statements: Check (Yes) or (No) next to each statement where applicable.

If necessary, use space that appears in the box at the top of Page 2 of the **Proposal Rousing Form** for explanations of items from Page 1. Please add continuation page(s), if necessary.

If you checked “Yes” to a question where prior authorization is required (i.e., IRB Approval, Animal Safety Protocol, etc.), please attach that documentation to the routing form prior to submittal.

Sign and date when completed

Signature of the Department Head and Dean or VP: Solicit appropriate signatures and have them affixed where indicated. Ensure that the date is entered for each signature.

If “Yes” to Question 9 on Page 1 under the Section, “Principal Investigator/Program Director’s Statement”, please describe the level of commitment, period of time, and plans to fulfill it.

On Page 2:

Faculty Release Time: Provide the names and departments of any faculty members for whom release time is requested. Indicate the amount of release time per academic year. List the amount of funds (\$) requested in this grant for release (salary and benefits) for the first year and the total grant. **You must have your department chair’s and dean’s signature approving the release time prior to submitting your routing form to OSP.**

Complete Section 3 on Page 2 if in-kind or cash matching is requested.

Complete Section 4 on Page 2 if out-year commitment is required.

ATTACHMENT III: Proposal Development Technical Assistance Request Form



TO: _____

FROM: _____

PROJECT TITLE: _____

PRINCIPAL INVESTIGATOR: _____

DATE ASSIGNED: _____

PRIORITY: _____

RETURN TO: _____ DATE NEEDED: _____

ACTION REQUIRED

-----EDITING STATUS-----

-----RESEARCH STATUS-----

-----GUIDELINES/ COMPLIANCE CHECK STATUS-----

-----GRANT WRITING/TECHNICAL ASSISTANCE STATUS-----

-----AGENCY FORM COMPLETION STATUS-----

COMMENTS:

Date Returned: _____ By: _____

**ATTACHMENT IV: Registration Request for Prospective
Principal Investigator**



OFFICE USE ONLY Date Input: _____ Agency ID: _____ User Password: _____ Date User Notified: _____ <i>If registering the PI with multiple agencies/portals, put info on the bottom of this page</i>

Principal investigator responsibilities are limited to individuals in regular faculty positions or in regular, professional-level administrative positions at the University.

1. Name: _____
2. Position Title: _____
3. Academic Department or Administrative Unit: _____
4. Name and Signature of Department or Administrative Unit Head

5. Phone number: _____
6. Fax number: _____
7. Email address: _____
8. Highest academic degree: _____ Year Awarded: _____
9. Highest degree field:
10. Awarding institution:
11. Other degrees and fields
12. Agencies or E-Portals:
 - a. National Science Foundation (Fastlane) and Research.gov
 - b. National Institutes of Health (eRA Commons)
 - c. FedConnect
 - d. Other (list all) _____

ATTACHMENT V: Time and Effort Reporting Form



FACULTY/PROFESSIONAL STAFF AFTER-THE-FACT ACTIVITY & EFFORT REPORTING FORM

OSP USE ONLY
Reviewed: _____
CC Dean or VP: _____
CC Grant Acctg, if in-kind effort involved: _____

Date: _____ Reporting Period: (Term/Year): _____

Name: _____ Dept.: _____ School: _____

This information is needed for Federal Documentation and Audit Requirements.

ACTIVITY List Sponsored and Regular Activities	GRANT No.	Grant Name	Percent Effort Must total 100%
Other Research (not for a sponsored program)			
Teaching			
Administration			
Service			

Actual total number of hours worked per week on average for teaching, research, administration, and service: _____

(Please complete the information and provide signatures on the back of this form)

Describe the Major Work Performed for Sponsored Project(s), and report effort committed, if applicable:

Sponsored Project (Grant #)	Description of Activities Performed	% Effort Committed & Funded	% Effort Committed In Kind	% Effort Performed

I certify that the information is correct:

Employee

Date

Principal Investigator*/Program Director*/Coordinator (Primary project)

Date

(if applicable):

Principal Investigator*/Program Director*/Coordinator (Other projects)

Date

Department Head or Manager of Employee

Date

After obtaining required signatures return this form to the Office of Sponsored Programs. Thank you

Report is due by January 15 for Fall Term, by June 1 for Spring Term, and by September 1 for Summer. OSP will distribute copies to Dean or Vice President and to Office of Grant Accounting, as appropriate.

ATTACHMENT VI: Request for Pre-Award Expenditures



My grant is recommended for funding, and I request approval of pre-award expenditures essential to make progress on the project.

1. Name: _____ Phone number: _____

2. Fax number: _____ Email: _____

3. Sponsor: _____ Proposal/grant # _____

4. Grant Title:

5. Expected Award Date: _____ Expected Award Amount _____

6. Requested Pre-Award Expenditure Amount: _____

7. Justification:

8. Attachments: A through E are required

a. Proposal abstract/summary (1-page)

b. Documentation of sponsor's intent to make award

c. Documentation that sponsor allows pre-award expenditures

d. Proposed grant budget, as submitted to sponsor

e. Requested pre-award budget (in UDC budget categories)

f. Other: _____

9. I agree to use pre-award funds only in accordance with sponsor and UDC policies.

PI Signature: _____ Date: _____

10. Approvals: Department Head: _____ Date: _____

Dean or Vice President: _____ Date: _____

Assoc. Provost for Research: _____ Date: _____

Managing Director for Finance: Approved:

Please set up account. _____

Denied _____ Date: _____

Account set up. Date: _____ Acct # _____ By
Name: _____

Distribution: PI and Office of Sponsored Programs

ATTACHMENT VII: Project Extension Request Form

**University of the District of Columbia
Office of Sponsored Programs**



Project Extension Notification (PEN)

Please read the instructions on page 2 prior to completion

Date:

Investigator:

Award Number:

Agency:

Project Title:

Current Project End Date:

Requested End Date:

Project Extension

(Applies to research projects only – except for U.S. Dept. of Ed.)

An extension for the subject grant is requested. **This extension of time will be accomplished with no additional funds requested from the agency and is necessary for the *effective and economical conduct of the project.***

Justification: (Please use additional sheets as needed)

Federal Agency Information

Please enter the following information regarding the Federal Agency's Grants Official to be notified.

Name:

Address:

Approvals: Please sign as requested below

Investigator: _____ Date: _____

Department Head: _____ Date: _____

Dean: _____ Date: _____

Authorized University Official: _____ Date: _____

Instructions

This form may be used to notify OSP and/or certain agencies of authorized one-time, no cost extensions of up to one year. The notification process is applicable to all research grants and cooperative agreements from the following agencies, unless the special terms and conditions for the particular award require otherwise:

NSF - National Science Foundation

Army - U.S. Department of the Army

DOE - U.S. Department of Energy

EPA - U.S. Environmental Protection Agency

NASA - National Aeronautics and Space Administration

NIH - National Institutes of Health

USDA - U.S. Department of Agriculture (CSREES awards under FDP allows two (2) PENS to be authorized; award

period CANNOT exceed five years under Public Law)

USDE - U.S. Department of Education (award period CANNOT exceed five years under Public Law)

Please be sure to review the terms and conditions of a particular award before submitting a notification form to ensure that this procedure is applicable to the award.

All agencies, except for the U.S. Department of Education, implement this authorization under the Federal Demonstration Partnership (actual FDP terms and conditions listed below for your information).

Federal Demonstration Partnership General Terms and Conditions

14. Extensions Without Additional Funds

Recipients may extend the expiration date of the project if additional time beyond the established expiration date is required to assure adequate completion of the original scope of work within the funds already made available. A single extension, which shall not exceed twelve (12) months, may be made for this purpose, and must be made prior to the originally established expiration date. The recipient must notify the cognizant awarding agency official in writing *with the supporting reasons* and revised expiration date at least ten (10) days prior to expiration of the award.

Please complete the information requested, obtain the appropriate signatures, and forward the form to your College/Unit Research Office. One-time, no-cost extensions should be received at least 15 days prior to the current expiration date to allow for processing time. Completed forms must be sent to:

Office of Sponsored Programs
Attention: JoVita Wells
[Building 42-212GIntelSat 6L-08A](#)
jowells@udc.edu
(202) 274-6260

**ATTACHMENT VIII: OMB Circular A-21 Excerpt on Personal Services,
Faculty Compensation (Section J.10)**

1. Salary rates for faculty members.
 - (1) Salary rates for academic year. Charges for work performed on sponsored agreements by faculty members during the academic year will be based on the individual faculty member's regular compensation for the continuous period which, under the policy of the institution concerned, constitutes the basis of his salary. ... In no event will charges to sponsored agreements, irrespective of the basis of computation, exceed the proportionate share of the base salary for that period. This principle applies to all members of the faculty at an institution. Since intra university consulting is assumed to be undertaken as a university obligation requiring no compensation in addition to full time base salary, the principle also applies to faculty members who function as consultants or otherwise contribute to a sponsored agreement conducted by another faculty member of the same institution. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the consultant is in addition to his regular departmental load, any charges for such work representing extra compensation above the base salary are allowable provided that such consulting arrangements are specifically provided for in the agreement or approved in writing by the sponsoring agency.
 - (2) Periods outside the academic year:
 - (a) Except as otherwise specified for teaching activity in subsection (b), charges for work performed by faculty members on sponsored agreements during the summer months or other period not included in the base salary period will be determined for each faculty member at a rate not in excess of the base salary divided by the period to which the base salary relates, and will be limited to charges made in accordance with other parts of this section. The base salary period used in computing charges for work performed during the summer months will be the number of months covered by the faculty member's official academic year appointment.
 - (b) Charges for teaching activities performed by faculty members on sponsored agreements during the summer months or other periods not included in the base salary period will be based on the normal policy of the institution governing compensation to faculty members for teaching assignments during such periods.
 - (3) Part time faculty. Charges for work performed on sponsored agreements by faculty members having only part time appointments will be determined at a rate not in excess of that regularly paid for the part time assignments. For example, an institution pays \$5000 to a faculty member for half time teaching during the academic year. He devoted one half of his remaining time to a sponsored agreement. Thus, his additional compensation, chargeable by the institution to the agreement, would be one half of \$5000, or \$2500.
1. Non-institutional professional activities. Unless an arrangement is specifically authorized by a Federal sponsoring agency, an institution must follow its institution wide policies and practices concerning the permissible extent of professional services that can be provided outside the institution for non-institutional compensation. Where such institution wide

policies do not exist or do not adequately define the permissible extent of consulting or other non-institutional activities undertaken for extra outside pay, the Federal Government may require that the effort of professional staff working on sponsored agreements be allocated between (1) institutional activities, and (2) non-institutional professional activities. If the sponsoring agency considers the extent of non-institutional professional effort excessive, appropriate arrangements governing compensation will be negotiated on a case by case basis.

ATTACHMENT IX: Colleges and Universities Rate Agreement

ORIGINAL

COLLEGES AND UNIVERSITIES RATE AGREEMENT

EIN #: 53-6001131

DATE: September 20, 2007

INSTITUTION:

University of the District of Columbia
 4200 Connecticut Avenue, N.W.
 Building 38, Room 302-6
 Washington DC 20008-

FILING REF.: The preceding Agreement was dated May 26, 2004

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: FACILITIES AND ADMINISTRATIVE COST RATES*

RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)

TYPE	EFFECTIVE PERIOD		RATE(%)	LOCATIONS	APPLICABLE TO
	FROM	TO			
PRED.	10/01/06	09/30/07	34.0	On-Campus	Research
PRED.	10/01/06	09/30/07	26.0	Off-Campus	Research
PRED.	10/01/06	09/30/07	52.0	On-Campus	Instruction
PRED.	10/01/06	09/30/07	26.0	Off-Campus	Instruction
PRED.	10/01/06	09/30/07	32.0	On-Campus	Other Spons. Act.
PRED.	10/01/06	09/30/07	26.0	Off-Campus	Other Spons. Act.
PRED.	10/01/07	09/30/11	46.0	On-Campus	All Programs
PRED.	10/01/07	09/30/11	22.0	Off-Campus	All Programs
PROV.	10/01/11	UNTIL AMENDED	Use same rates and conditions as those cited for fiscal year ending September 30, 2011.		

***BASE:**

Modified total direct costs, consisting of all salaries and wages, fringe benefits, materials, supplies, services, travel and subgrants and subcontracts up to the first \$25,000 of each subgrant or subcontract (regardless of the period covered by the subgrant or subcontract). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, student tuition remission, rental costs of off-site facilities, scholarships, and fellowships as well as the portion of each subgrant and subcontract in excess of \$25,000.

INSTITUTION:
University of the District of Columbia

AGREEMENT DATE: September 20, 2007

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

Fringe benefits are specifically identified to each employee and are charged individually as direct costs. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES:

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the costs of these paid absences.

OFF-CAMPUS DEFINITION: For all activities performed in facilities not owned by the institution and to which rent is directly allocated to the project(s), the off-campus rate will apply. Grants or contracts will not be subject to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.

Fringe benefits include FICA, retirement, disability insurance, life insurance, tuition remission, TIAA/CREF, workers' compensation, unemployment insurance, health insurance and dental insurance.

Equipment means an article of nonexpendible tangible personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

INSTITUTION:
University of the District of Columbia

AGREEMENT DATE: September 20, 2007

SECTION III: GENERAL

A. LIMITATIONS:
The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions:
(1) Only costs incurred by the organization were included in its facilities and administrative cost pools as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) The same costs that have been treated as facilities and administrative costs are not claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:
This Agreement is based on the accounting system purported by the organization to be in effect during the agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from facilities and administrative to direct. Failure to obtain approval may result in cost disallowances.

C. FIXED RATES:
If a fixed rate is in this Agreement, it is based on an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:
The rates in this Agreement were approved in accordance with the authority in Office of Management and Budget Circular A-21 Circular, and should be applied to grants, contracts and other agreements covered by this Circular, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:
If any Federal contract, grant or other agreement is reimbursing facilities and administrative costs by a means other than the approved rate(s) in this Agreement, the organization should (1) credit such costs to the affected programs, and (2) apply the approved rate(s) to the appropriate base to identify the proper amount of facilities and administrative costs allocable to these programs.

BY THE INSTITUTION:
University of the District of Columbia

(INSTITUTION)

Barbara Jumper

(SIGNATURE)

Barbara Jumper

(NAME)

Chief Financial Officer

(TITLE)

(DATE)

ON BEHALF OF THE FEDERAL GOVERNMENT:

Department of Health and Human Services

(AGENCY)

Darryl Maves

(SIGNATURE)

Darryl Maves

(NAME)

Director

Division of Cost Allocation

(TITLE)

September 20, 2007

(DATE) 0466

HHS REPRESENTATIVE: Stephen Hobday

Telephone: (202) 401-2808

ATTACHMENT X: UDC Institutional Review Board Application for Approval to Use Human Participants

**University of the District of Columbia
Institutional Review Board
APPLICATION FOR APPROVAL TO USE HUMAN PARTICIPANTS**

IRB No: _____

Date Received: _____

Instructions to the applicant:

1. Please review the UDC IRB *Guidelines* udc.edu/irb and complete this application form.
2. Attach a copy of the informed consent form, any recruitment notices, research survey instruments, psychological tests, interview forms, or scripts to be used. (The attached Sample Informed Consent Form and Checklist are useful guides.)
3. Attach a certificate of completion of training in the protection of human research subjects, completed within the last three years, from <http://phrp.nihtraining.com/users/login.php> or other appropriate source.
4. If your application has been approved by another IRB, kindly attach a copy.
5. Submit completed application documents electronically in a single file to IRBNet.org
6. Sign this application form electronically in irbnet.org submission.

I. Administration

Principal Investigator: _____ Faculty Rank: _____

Department: _____ Office Phone: _____ Email: _____

Co-Investigator: _____ Faculty Rank: _____

Department: _____ Office Phone: _____ Email: _____

Project Title: _____

Source of funding: _____

Dates of Proposed Project From: _____ To: _____

Type of application: () New () Renewal () Revision

Date of Submission to IRB: _____

II. Project Information

1. Is this proposal qualified as exempt research? Yes () No ()

If yes, please check the following items to indicate why this proposal qualifies for exemption.

If no, please complete items 2 to 9

a. Does the research involve normal educational practice? Yes () No ()

b. Does the research involve the use of educational tests, surveys, interviews, and observations of public behavior? Yes () No ()

If yes:

Can information be linked to the subject? Yes () No ()

Will disclosure of information place subject at some risk? Yes () No ()

c. Does the research involve the use of educational tests, surveys, interviews or observations of public behavior not exempt under (b) above, where participants are elected or appointment of public officials or candidates for public office? Yes () No ()

d. Does the research involve only the collection of existing data, documents, records or pathological specimens? Yes () No ()

If yes:

Are these sources publically available? Yes () No ()

Can information be linked to the subject? Yes () No ()

e. Is research conducted by or subject to approval of Federal agencies? Yes () No ()

f. Is research an evaluation of taste, food quality, and consumer acceptance? Yes () No ()

g. Does the procedure meet government safety regulations? Yes () No ()

2. Human Participant Pool (Please mark the appropriate space(s).)

Children: _____

Age Range: _____

College Students: _____

Prisoners: _____

Pregnant women: _____

AIDS patients: _____

Persons with disabilities:

Other (please specify):

3. Does the study involve:

University public records?	Yes ()	No ()
University non-public records?	Yes ()	No ()

4. Does the study potentially involve:

Physical risks to the participants?	Yes ()	No ()
Social risks to the participants?	Yes ()	No ()
Psychological risks to the participants?	Yes ()	No ()
Discomfort to participants?	Yes ()	No ()
Invasion of privacy?	Yes ()	No ()
Disclosure of information possibly damaging to participant(s) or others?	Yes ()	No ()

5. Are participants clearly informed about:

The nature and purposes of the study?	Yes ()	No ()
The procedures to be followed including alternatives?	Yes ()	No ()
Any risks and/or discomfort?	Yes ()	No ()
Any sensitive questions?	Yes ()	No ()
Any benefit to be derived?	Yes ()	No ()
The right to refuse or withdraw from the study?	Yes ()	No ()
The confidential handling of data?	Yes ()	No ()
The compensation policy (for more than minimal risk)?	Yes ()	No ()
Whom to contact?	Yes ()	No ()

6. Will a signed or oral consent be obtained? Yes () No ()
- If yes,
- From participants? Yes () No ()
- From parent or guardian? Yes () No ()
7. Will a copy of the disclosure consent form be given to the participant/guardian? Yes () No ()
8. Will precautions be taken to safeguard confidentiality and protect the anonymity of participants? Yes () No ()
9. Will proposal involve collaboration with an institution, agency, or individual etc.? Yes () No ()

If yes, please specify below:

III. Project Description

- a. Please attach, insert or append a description of the project's purpose, hypothesis, research design and methodology
- b. Please attach, insert or append a statement describing the involvement of human participants, including how you will accomplish the items answered "Yes" above.

IV. Brief Biographical Sketch of the Principal Investigator:

- a. Name: _____
Rank: _____

- b. Education:

Highest Degree	Institution	Year Completed	Field of Study

- c. Research and/or Professional Experience: Please list in chronological order: previous employment, experience and honors. Please also list in chronological order the titles of all publications during the past three years pertinent to this application.

V. Commitment to Human Subjects Protection

I, the Principal Investigator, declare that the information provided in this application is correct and complete to the best of my knowledge. I agree to abide by the rules and regulations governing the rights and welfare of human participants in research as set forth by the Institutional Review Board (IRB) of the University of the District of Columbia. I will Not conduct the project involving human subjects unless and until it is approved by the IRB. I also agree to submit documents/information pertinent to this project as requested by the IRB. I will retain properly executed consent forms as part of my record of this project and I will immediately notify the Chairperson of the IRB of any adverse reactions encountered and

corrective measures taken. I will also provide Notice to the Board of any changes to be instituted in the protocol and seek approval from the Board during this investigation.

Principal Investigator's Signature: _____

Date: _____

Address: _____

Telephone: (O): _____

(H): _____ Fax: _____

Email: _____

ATTACHMENT XI: Sample Data Management Plan

Sample Outline for a Data Management Plan: A Data Management Plan typically contains the following sections; however please check your sponsor's specific requirements:

Data description and nature of the data: This section should provide a general overview of the nature of the data or other materials produced under the NSF-sponsored project. What are the characteristics of the data? What type of data will be generated? If your data are of a sensitive nature (related to human subjects for example), it should be noted in this section and addressed more fully in later sections. Sample data management plans can be found on the OSP website.

Standards to be used for data and metadata format and content: This section should provide short summary of the data standards and metadata standards you will use over the course of your projects. The term, "metadata" refers literally to "data about the data," and they usually take the form of a list of elements used to describe the data. Some of the questions you may want to answer in this section include:

- What file formats will be use for the data (if applicable)?
- What metadata will be collected and maintained to make the data meaningful?
- How will the project save the details of the data and metadata?
- How will the accuracy and validity of the data and metadata be assured?

Describe the method for preserving the data: This section should provide a short summary of how the data will be preserved and made available for sharing. Some of the issues to be addressed are:

- Will the data be shareable? (If the data will not be shareable, please explain why here.)
- How and when will you make the data available? (If there are any embargo periods due to contractual arrangements please detail those here.)
- What is the process others would use for gaining access to the data?
- Does the original data collector/ creator/ principal investigator retain the right to use the data before opening it up to wider use? If yes, for how long?
- What, if any, provisions will be made for appropriate protection of privacy, confidentiality, security, intellectual property, or other rights or requirements if necessary?

State how long the data will be kept: (OMB Circular A-110) mandates that original data be kept at least 3 years from the end of the project providing there are no ongoing investigations. However, the common practice is to keep the original data in perpetuity. Some issues you might want to address in this section are:

- What is the long-term strategy for maintaining and archiving the data?
- Where will the data be stored?

- What transformations will be needed to allow data sharing (de-identifying or aggregating the data, etc.)?
- What metadata and/or documentation will be created and where will it be stored?
- How long will the data be kept?