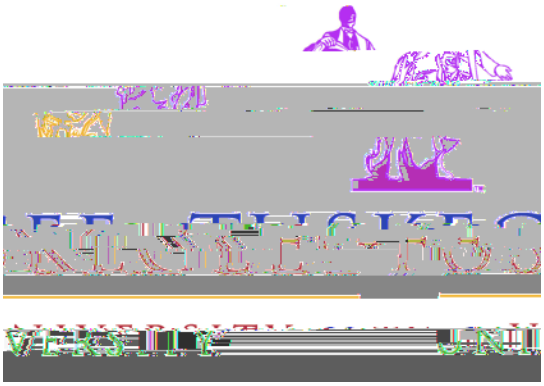
**Tuskegee University**

**Division**



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A. Sponsored Programs Checklist
B. Internal Proposal Routing Form (IPRF)
C. Proposal Review Form
D. Request for Indirect Cost Adjustment Form (ICAF)
E. Request for Indirect Cost Reduction Form (ICRF)
F. Subrecipient Financial Conflicts of Interest Disclosure Form
G. Award Processing Form (APF)
H. Budget Adjustment Request (BAR)
I. Pre-Closeout Memo
J. Checklist for Subaward/Subcontract Close-outs
K. Cost Sharing/Matching Sources (CSMS)
L.

## PRINCIPLES REGARDING RESEARCH AND SPONSORED PROGRAMS

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

**A.** The principal investigator is critical to carrying out externally sponsored programs. The awards are made, however, Tuskegee University which bears ultimate responsibility for all sponsored programs and is legally responsible for those activities.

**B.** The authorizing signature(s) on a proposal represents Tuskegee University's agreement to proceed with the project, if funded.

**C.** The principle of freedom of research establishes the right of the scholar to determine the subject matter and conclusions of his/her research. It protects him/her from imposition on the works, goals and criteria other than professional ones.

**D.** Any agreement between Tuskegee University and an external sponsor must have some form of sanction in advance. The purpose of this sanction is to insure that the project conforms to administrative and fiscal policies of Tuskegee University and does not conflict with the rights of other scholars or with other institutional commitments.

**E.** The source of sponsorship and the purpose of the project must be of such a nature that they can be publicly disclosed. Any exception to this principle must be in the best interest of Tuskegee University and in adherence to the requirement of the sponsor and

## Procedures

### 1. Submitting a Letter of Intent

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

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

### 2. Notification of Internal Competition

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

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

### 3. Review and Selection

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

a) Whether it is more appropriate to ask the Dean of the College or School to determine selections, if more Internal Proposal Routing Forms (IPRFs) are received from that College or School; or

b) If more than one College or School is involved, the Vice President for Research and Sponsored Programs will seek the solution in consultation with the Provost and the college deans to determine whether there are possibilities of collaboration among potential PIs or suggest other actions that would reduce the number of potential proposals; or

c) Whether a faculty-led review committee should be convened to review the potential applications and recommend selections.

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

### 4. Selection and Notification

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

### 5. After the Selection

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

## PROPOSAL/COMPLIANCE REVIEW AND APPROVAL

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

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

### COMPLIANCE REVIEWS

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

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

**Biosafety Committee (BC):** The Biosafety Committee is charged with the responsibility of ensuring that all activities within Tuskegee University involving potentially bio hazardous materials are conducted in a safe pT.925te F26--12(l)(1)-3lo m1 A16 mm Coc rhte4f t-3(h)Hu s8( a)11(l)8(l)8( )160.92 1 scn 840325.44 486 12.96 re5f*

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

***The principal investigator is responsible for providing the OGC with the hard copy with all signatures and electronic copy of the proposal, by the date established for reviews. Proposals requiring compliance***

**Unsolicited Proposals**

Unsolicited proposals are submitted to an agency that generally funds research of the type being proposed. If the agency decides to fund the research, the funding may take the form of a grant, contract or cooperative agreement. Most large agencies have set deadlines for submittal of unsolicited proposals each year, and funding decisions are made once all proposals received in that time period have been reviewed. Corporate opos2(4. C

j. Other Direct Costs: Includes direct costs not specifically described by the general headings above such as tuition remission, scholarship, stipends, subsistence, etc.

2. **Facilities and Administrative Costs (F&A):** Facilities and Administrative (F&A) Costs, previously known as indirect costs, are the expenses incurred for general University operations while conducting the research project, such as library services, administrative costs, and building use and maintenance. F&A costs are calculated as a percentage of direct costs and are set by the Federal Government.

   The federal government provides rules (OMB Circular A-21) governing the calculation of F&A cost rates and periodically audits the costs supporting the rates we have negotiated. Some items, such as capital equipment and tuition, are excluded from the F&A cost calculation. Known as Modified Total

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

## ELECTRONIC PROPOSAL SUBMISSION PROCEDURES

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

Close to the conclusion of the routing and approval process, the proposal is entered either by the OSP or by the PI (as per prior agreement) into the appropriate agency electronic research administration system. Most agencies use Grants.gov (Adobe application packages) but the NSF and NIH maintain their own proprietary sites like the National Science Foundation's Fastlane or the National Institute of Health's NIH eRA Commons. The OSP has expertise in all of these systems and will guide the PI toward what documents are required by each agency for transmission into these systems. Although some sponsors may provide the rare opportunity to submit either on paper or electronically, in the interest of the environment, the OSP will encourage the proposal to be submitted electronically. This commitment is consistent with the federal Government Paperwork Elimination Act and supports the goal of conserving University resources.

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

**What is covered?**

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

1. Salary, royalties, or other remuneration from the Tuskegee University;

2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;

3. Income from service on advisory committees or review panels for public or nonprofit entities;

4. An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value,

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

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

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

**CONFLICTS OF INTEREST AND COMMITMENT POLICY STATEMENT**

Tuskegee

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

**Sponsored Project Files**

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

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

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

The Budget Adjustment Request (BAR) is a form used by OSP in the initial set up of a budget and any increases or decreases in the project budget. It is prepared in triplicate for each budget adjustment requested. The OSP will give fund and department (first seven digits) for grant accounts with project number to be assigned by VP for Budgets and Planning. A BAR should not be done unless there is a Notice of Grant Award and a proposal on file. A completed BAR, along with four -2( e)11( w)5(i11() )11( w)5(i.t11(f)-4(our)-4( )1C622 0 Td l(

## PRIOR APPROVAL (INSTITUTIONAL)

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

1. All requests must be submitted in writing by the principal investigator or program director to the Prior Approval Officer. A copy of the proposal and all grant terms and conditions must be on file before budget changes will be considered.

2. The request must indicate the colleague number and the specific lines of the budget to be decreased and increased.

(Note: Participant support costs cannot be rebudget without prior written approval of the program officer, and REU grants can only be given to undergraduate students in accordance with special grant conditions (P.A. 05592)

3. The request must include a detailed and clear justification of the following:

a. Decreased Lines (s): why funds are available
b. Increased Lines (s) how the funds will be spent
c. How the changes will allow goals and objectives to be accomplished.

4. If approved, the Vice President for Research and Sponsored Programs will forward the request to the Office Grants and Contracts Accounting for input into the University's accounting system. A copy of the approved request indicating the date entered into the financial system will be returned to the individual submitting the request. This certifies that the request has been completed and funds can be obligated.

5. Copies of all requests for rebudgeting will be maintained as part of the permanent file.

## PRIOR APPROVAL (BY AGENCY/SPONSOR)

Other federal agencies (e.g., MHPF, DoT, DoI, and USAID) as well as state agencies and foreign sponsors have not given Tuskegee University the authority to rebudget between categories, and the rebudget request must be submitted to the agency for sponsor approval. This letter of request must be signed by the PI and the Vice President for Business and Fiscal Affairs, if applicable. Some sponsors require the signature of an

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

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

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

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

**REPORTING**

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

## PUBLIC ACCESS POLICY

Beginning in 2008, the National Institutes of Health (NIH) made it mandatory for funded investigators to submit final versions of their manuscripts to PubMed Central, the National Library of Medicine's digital archive. All NIH grantees must deposit their peer-reviewed articles upon acceptance for publication and make them available to the public **within 12 months after**

## REDUCTION IN PRINCIPAL INVESTIGATOR/CO-PI EFFORT

### Federal Awards

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

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

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

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

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

When a federal sponsor needs to approve a reduction in the PI's/Co-PI's time, the PI/Co-PI should contact his or her assigned Grants Specialist in OS(g)10.006 n</.04 -Fn</.0201 Tm (o)Tj 0.005 Tc 0.006as s13(uo-2( as)1(r)-2((uo-

## TRANSFER OF GRANT OR CONTRACT

**To another institution:** The PI who is transferring to another institution may wish to continue his or her sponsored research project there. Steps may be initiated to transfer the grant or contract only upon concurrence of the department head and the Provost/Chief Academic Officer. Permission must be obtained from the sponsoring agency for such transfers (transfers are by no means automatically granted by all sponsors); arrangements must proceed through the OSP. There may be instances in