SIU SOUTHERN ILLINOIS UNIVERSITY OFFICE OF SPONSORED PROJECTS ADMINISTRATION

SIU Sponsored Project Guide

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Section 1: Introduction to Sponsored Projects

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1.1 Overview

Sponsored projects are activities supported by non-University (external) funds awarded as the result of a **proposal** or **application for funding** submitted formally to an agency by the Board of Trustees of Southern Illinois University on behalf of a faculty or staff member. Sponsors include federal and state agencies, private foundations, nonprofit organizations, business and industry, and local governments and school districts.

Sponsored projects are supported by grants, grants-in-aid, contracts, or cooperative agreements. They do not include gifts and bequests to the University, which are administered through the SIU Foundation.

Sponsored projects are usually research-, training-, or service-oriented. The **award agreement** commits the sponsor to fund the project to a certain level, and it commits SIUC to carry out the activities specified in the proposal over a specific project period.

When an award is made by a funding agency, it is **awarded to the institution**—specifically, the Board of Trustees of Southern Illinois University—on behalf of the **principal investigator** (**PI**), the person who is primarily responsible for carrying out the requirements of the award. (On non-research awards, the principal investigator usually is referred to as the **project director**.) The few exceptions are individual awards, such as some faculty fellow ships. See principal investigator eligibility and responsibilities.

Grant/contract proposals require review and approval by the relevant department(s) and college(s) and by OSPA. **All grant/contract proposals and awards are processed through OSPA.** As the office responsible for submitting proposals and accepting awards at SIUC as an agent of the Board of Trustees, OSPA affixes the institutional signature to proposals and award agreements. See the Policy on Institutional Submission of Grant/Contract Applications and Acceptance of Awards.

Every request for external funds submitted by SIUC is a **legal agreement** committing the University to undertake certain activities at a certain cost. Consequently, the proposed project must accord with University, college, and department goals, capabilities, and policies, as well as with federal and state regulations. In administering sponsored projects, SIUC, like all universities, must abide by the cost accounting principles set forth in <u>Circular A-21</u> of the federal Office of Management and Budget.

In developing a proposal and administering a grant or contract, the principal investigator is representing the University and is responsible for upholding the high standards expected of SIUC projects. In most cases—if the PI is a full-time SIUC employee on continuing appointment—he or she also will serve as **fiscal officer** of the project, with all the attendant responsibilities of project fiscal management. Some colleges and departments at the

University place additional restrictions on who may be a fiscal officer; check with your department chair if you have questions.

Grants and contracts from government agencies and most private organizations require a written **proposal**, often solicited by a **Request for Proposals (RFP)** for a specific program with a specific deadline. Some programs or agencies have "open" deadlines, and some agencies also will accept unsolicited proposals in their areas of interest. Never submit an unsolicited proposal without first checking the agency's policy.

Proposals typically are **peer-reviewed** by a panel of experts, which reviews and ranks proposals and makes funding recommendations to the relevant **program officer** at the agency. Program officers oversee funded projects in their areas of specialization.

OSPA helps familiarize researchers with funding agency regulations and offers guidance on whether to accept certain agency restrictions. It also reviews award agreements for conflicts with University policy. For more information, see section 6, Award Negotiation and Acceptance, and section 10, Research-Related Policies and Compliances.

Grants and contracts sometimes involve making **subawards** to collaborating institutions—or a grant or contract made to SIUC may be a sub-award from another institution. See subawards in section 7 of this guide for more information.

OSPA has put together a Glossary of Research Terms that may be helpful if you are new to the world of grants.

1.2 Grants

As a general rule, the **grant** mechanism is used when the sponsor is not seeking immediate benefit for itself but is simply providing support for work that the principal investigator has planned independently or in response to an RFP. The grant recipient makes no guarantees other than that work will be done as described in the proposal, that good management practices will be followed, and that progress and final reports will be provided to the sponsor as specified in the award agreement. If the grantor is unhappy with the quality of the work, how ever, or if it feels the research findings are not promising, it may not fund the applicant in the future. Ordinarily there are no limitations on the use or publication of the project results.

Grants are generally made for a specific period—sometimes for a year or less; sometimes for multiple years. In the latter case, funds usually are disbursed on an annual basis by the granting agency. The principal investigator may be required to submit a **noncompeting continuation application** as each subsequent grant year approaches, to satisfy the agency that the work is on track with the plan outlined in the original proposal. In contrast, getting a grant

renewed entails preparation of another proposal (called a **competing renewal** or competing application), which will be peer-reviewed just as the original proposal was.

Many types of grants are available. **Research grants** support studies to test theories and hypotheses by developing or interpreting new ideas or information. They do not require an immediate benefit and may not yield definitive findings, especially in the case of highly exploratory work. Grants may be for basic or applied research.

Demonstration grants illustrate the effectiveness of a new or unique procedure or method while providing a direct benefit to a particular population. A demonstration grant might, for example, provide specific health-care services to clients. **Training grants** support the costs of training staff, potential staff, or students in skills needed in a particular field.

Equipment grants can help the institution or the principal investigator upgrade laboratory capabilities. **Planning grants** allow an institution to lay the foundation for a new project. **Challenge grants** require the institution to find an additional funding source for a specified percentage of the project costs. **Seed grants** help the institution initiate certain activities or services that are to continue after the grant support ends.

The simplest grant agreement, called a **grant-in-aid**, is used most often by corporate sponsors. It is unusual in that it does not involve a formal written proposal, a formal agreement, or any reporting requirement by the sponsor. The award consists of a letter identifying the research activity to be supported with the funds, and a check setting the award amount. Like other grants, grants-in-aid are institutional awards and must be processed through OSPA.

Fellow ships also are considered to be grants. Unlike most other grants, how ever, they typically are awarded directly to an individual rather than to the institution. When that is the case, the award is *not* processed through OSPA, unless required by the funding agency.

1.3 Contracts

Contracts usually are used by sponsors when they have a specific need or benefit in mind. Contracts are most often awarded by government agencies and by business and industry, seldom by foundations. The sponsor stipulates its needs, and the principal investigator and the sponsor reach a detailed agreement about activities to be performed for a set price within a set period of time (which can range from a few months to several years). Industrial firms, for example, often approach such support as the purchase of services and use a standard purchase order form. Contracts often involve analyses or testing—whether it be hearing testing for schoolchildren, laboratory analysis of composite materials, or drug efficacy trials. Contracts are much more explicit and binding than grants are in terms of the work outline and reporting of results. A contract entails a specific performance agreement: the principal investigator is guaranteeing that analyses will be performed, tests conducted, or services provided exactly as stipulated in the contract and that high standards ("best-effort" performance) will be maintained. The contract cannot, of course, stipulate the achievement of specific research results. In a drug trial, for example, the PI is obligated to test efficacy using the procedures agreed upon in the contract but cannot be penalized if the outcome is unfavorable for the pharmaceutical company sponsoring the trial. Nor can sponsors withhold payment if the results are not to their liking.

Contracts frequently involve a complex legal agreement, which must be reviewed by OSPA and often by University Legal Counsel. Contracts are more likely than grants to contain provisions restricting the publication or other use of research data, or clauses affecting potential patent rights and licensing agreements. A standard research agreement available from OSPA can be used as a framework for negotiating such issues with sponsors, particularly corporate sponsors. OSPA staff can help negotiate research agreements and should be consulted to ensure that specific provisions do not violate University policy.

The typical small contract, frequently used by business and industry, is a **fixed-fee** (or **fixed-amount**) **contract**. The standard fixed-fee contract is, in effect, payment for the preparation of a technical report that is produced for a set price. The sponsor pays the fixed amount regardless of whether the actual costs of the research activities involved turn out to be higher or low er. If the project ends up costing more than originally estimated, the company normally does not increase the award; thus, the extra expense must be borne by the University.

Another type of contract is the **cost-reimbursement award**. With this arrangement, the sponsor reimburses the University for the actual costs of the research activities undertaken, up to the amount originally awarded. Audits of project expenses sometimes are required by sponsors making cost-reimbursement awards.

With both fixed-fee awards and cost-reimbursement awards, prior approval of the sponsor is required for an increase in the amount of the award.

1.4 Cooperative Agreements

A hybrid sponsorship that combines elements of both the grant and the contract is known as a **cooperative agreement**. The cooperative agreement allows researchers from the University and the sponsor or other organization to work jointly in an area of investigation. Both parties make available personnel to work on projects, and both parties formally participate in planning, coordinating, conducting, and evaluating activities carried out under the agreement. The award agreement typically sets forth this technical involvement in detail. Occasionally, two or more agencies or organizations are willing to co-sponsor a given activity, such as a conference of mutual interest or a research project the results of which will be shared among the sponsors. A combination of grants and contracts may be involved in such multi-sponsor efforts. Such sponsorship can include, for example, an **industrial affiliates program** coordinated by a campus research center.

Section 2: Project Planning

- 2.1 Initial Project Development
- 2.2 Internal Funding Programs
- 2.3 External Funding Sources
- 2.4 Industry Sponsorship: Special Considerations
- 2.5 Before You Write the Grant Proposal
- 2.6 Release Time and Cost Sharing

2.1 Initial Project Development

As a potential applicant for external funding, your first steps are to develop preliminary ideas for your project and to identify sponsors whose interests and priorities are compatible with your research goals.

Before you can target the most appropriate funding agencies, you must know what you hope to accomplish and what institutional capabilities are in place to make the project possible. You may already have preliminary data to build upon, or you may need to do some pilot work (perhaps with University support; see Internal Funding, below). If your idea involves a partnership with colleagues, other universities, or the private sector, you need to begin laying the groundwork early on.

Many factors will influence the type of proposal you write and the agency to which you submit the proposal. At the project planning stage, it is vital to think carefully about:

- The need for the project. You will be in a better position at the proposal-writing stage if you have done a thorough job of reviewing the literature, gathering data, and assessing other studies in the same area. This knowledge will help you define your approach to the project and point out its uniqueness and potential contribution to the field.
- The degree of training and experience that you have had in the proposed research area. This will help you determine whether to submit the proposal alone or perhaps seek collaboration with a more experienced researcher. Make sure you are eligible to serve as a principal investigator (PI).
- The funds, facilities, equipment, and personnel needed to carry out the project. These are key considerations in planning the project and identifying funding sources. Different

agencies fund different types of projects. Some disallow certain types of expenditures, such as equipment. The availability of needed research expertise or resources is critical to a project and a strong selling point for a proposal.

Advice at the planning stage from colleagues, department chairs, and associate deans for research can prove invaluable in obtaining grant funding. We also urge you, particularly if you are new to grant writing, to meet with the OSPA research project specialist assigned to your college to discuss your research interests and possible funding sources.

2.2 Internal Funding Programs

Obtaining an internal (SIUC-funded) grant often is the first step toward external funding, particularly for new faculty. OSPA administers a competitive seed grant program (see below). Some SIUC research centers and colleges also offer small grant programs in specific areas.

Non-grant funding programs that can improve your chances of landing an external grant or contract include matching funds for proposals and travel funds.

Faculty Seed Grants

Full-time faculty members on continuing appointment may apply to the Faculty Seed Grant Program, administered by OSPA. Seed grants are competitive, peer-reviewed awards that fund a variety of research, scholarly, and creative activities in order to allow faculty to better compete for external funding. They enable faculty to run a pilot study, analyze preliminary data, do background research on an issue, complete a key stage in a larger scientific, scholarly, or artistic project, or otherwise lay the groundwork for an externally funded project. Proposals are reviewed annually by designated faculty committees. Grants are made for a period of one year. For details, see the program guidelines and application form on the Faculty Seed Grant Program main page.

Interdisciplinary Research Seed Grants

Full-time faculty members on continuing appointment may apply to the Interdisciplinary Research Seed Grant Program, administered by OSPA. This competitive, peer-reviewed program provides initial support for new, long-term programs of collaborative interdisciplinary research that will have strong potential to attract external funding. Grants are made for one or two years in priority areas that may change from year to year. For details, see the program guidelines and application form on the Interdisciplinary Research Seed Grant Program main page.

Matching Funds

The Matching Funds Program, administered by the Office of the Vice Chancellor for Research and Graduate Dean, assists faculty or staff who are pursuing external grants that require a match, or for which a match would be highly advantageous. **Proposals with a partial match from the department or college are more likely to gain a matching funds commitment from the Vice Chancellor. Proposals to competitive federal programs that require a match are given highest priority.** See the program guidelines for the application procedures and the form which is in a fillable PDF format.

Note that any cash match from this program or from other SIUC units either must appear in the budget or must be cited in the proposal narrative or budget justification. It also must be indicated on the Proposal/Aw ard Checklist. **If you don't meet these requirements, the grant's matching funds could be rescinded.**

Travel Support

The Travel Support Program, administered by OSPA, provides funds to (1) attend national or international conferences in order to give presentations; (2) travel to sites for special one-time research opportunities or collaborations (note that most research travel is supported under the Faculty Seed Grant Program); and (3) visit program officers to help secure funding for a major project, such as a research center. Applicants **must also have support from some other source** (dept., college, etc.). Preference is given to tenure-track/tenured faculty and to faculty or staff with regular graduate faculty status. Some funds also are available for students for the same purposes. See the program guidelines for more details, application procedures, and request form (fillable PDF format).

2.3 External Funding Sources

Since agency grant programs and program priorities change from year to year, it is important that you have up-to-date knowledge about funding sources. The best place to start is right here, with OSPA's web site. Most funding searches these days are done via the Internet, and many funding agencies now release information only electronically.

From OSPA's home page, you can access the <u>Community of Science (COS)</u> grant program database, which makes searching for funding sources convenient. You can access a wealth of material from COS by keyword, program type, or academic qualifications, and you can arrange for funding alerts to be e-mailed to you automatically. Our web site's External Funding menu leads to pages containing links to public and private funding agencies and agency application forms. OSPA also publishes Research Matters, a monthly electronic new sletter containing grant program descriptions, other research-related information, and links to grant deadlines and listings of grant/contract awards.

In reviewing funding sources, you should look for the following:

- compatibility of your proposed research and agency interests;
- number of grants awarded annually by the agency and average award amount;
- typical number of proposals received for a particular program or solicitation;
- eligibility requirements: geographical restrictions (if any), types of institutions and investigators funded, etc.;
- types of support given (e.g., research, general operating, equipment, etc.);
- application deadlines for grant programs (most programs have review cycles, but some accept proposals at any time); and
- method of application.

Government Agencies

Federal, state, and local government agencies constitute by far the largest source of external funding for grants and contracts at SIUC. Most federal and state agencies that award grants and contracts issue formal Requests for Proposals (RFPs) or Requests for Applications (RFAs) within clearly defined programs. Local public sponsors include cities and school districts; the awards they make are often small contracts. In addition, federal or state funds sometimes are subcontracted through these local sponsors or through other universities or agencies to SIUC ("flow through" funds).

Business and Industry

Most industry sponsors of research do not run formal grants programs or issue Requests for Proposals. Instead, projects tend to evolve through informal networking or prior contacts such as consulting relationships. Awards frequently are grants-in-aid or contracts. (Corporate *foundations* and nonprofit industry associations often do make grants through organized research programs; see the information on foundations below.)

Faculty also work with business and industry partners through the federal Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs, which allow University researchers and small businesses to work together. A small percentage of each federal agency's research money is set aside for SBIR and STTR initiatives to increase the commercialization of innovations from federally funded research.

Foundations

Grantmaking foundations are nonprofit organizations whose funds usually come from a single source—an individual, family, or corporation. Some, such as the Ford Foundation and the Rockefeller Foundation, administer highly competitive, nationwide grants programs. Others are restricted geographically and usually make small grants. Special-interest foundations restrict their grants to programs within a single field. Foundations can be an excellent source of funding, but applicants must have innovative ideas and must carefully target those

foundations most likely to be interested in the project topic. It's essential to get current information from the Internet about foundation grant programs, since many foundations change program emphases from year to year. See the list of foundation links on OSPA's web site.

Important: If the foundation you're interested in does not offer specific grant programs but invites letters of inquiry for grants, **check first with Jill Gobert (453-3974, jgobert@siu.edu) at the SIU Foundation to see if the University is already working with the foundation.** Many foundations prefer to have only one contact at an institution and expect all funding requests to be coordinated through that person; Jill can assist your efforts. If a foundation only makes gifts rather than grants, you must work through the SIU Foundation.

Other Nonprofits

Other nonprofit funding agencies include professional societies, fundraising/research organizations, and associations for industrial or other special groups. Some of these organizations run formal grants programs and issue Requests for Proposals; others operate informally. SIUC faculty and staff have obtained grants from groups ranging from the

2.4 Industry Sponsorship: Special Considerations

Although grants-in-aid from industry require no formal proposal, they still are institutional research awards that must be processed through OSPA. In the case of other grants and contracts, discussions with the industry representative will clarify expectations and lay the groundwork for submission of a proposal through OSPA to the prospective sponsor. Such discussions do not create binding commitments between sponsors and the University. Only the authorized institutional official (the OSPA director for the SIUC chancellor) can legally bind the University to grant/contract agreements.

Although proposals for industry-sponsored projects often are shorter and less formal than those submitted to federal agencies, the accompanying legal agreement can be quite elaborate. Besides addressing the planned research and its costs, discussions with industry sponsors should cover matters such as publication rights, intellectual property ownership, confidentiality issues, and other potential contract clauses that must be consistent with University policies. For more information, see section 10, Research-Related Policies and Compliances.

Proposals for industry-sponsored projects should detail the specific nature and scope of the work to be done, time frames, budget (including all direct and indirect costs), and any other conditions, such as negotiated agreements concerning patentable discoveries and copyrightable materials that might result from the research, nondisclosure of proprietary information, etc.

SIUC has drawn up a model agreement as a framework for negotiating such provisions with industry sponsors. In some cases, certain provisions are negotiated at the award stage. Where special conditions are likely to be involved, check with OSPA before writing a detailed proposal or entering into negotiations with the sponsor. OSPA staff can negotiate research agreements and should be consulted to ensure that the provisions are compatible with University policy. Some agreements must also be reviewed by University Legal Counsel.

In working with industry sponsors, researchers should be sensitive to the need to avoid potential or apparent conflicts of interest.

2.5 Before You Write the Grant Proposal

Early on, you should obtain the **current guidelines or Request for Proposals (RFP)** for the program you want to apply to. Guidelines are available electronically from agencies via OSPA's web site (see External Funding). Review the guidelines thoroughly. They will detail current funding priorities and the types of projects the agency or program will fund, including project period and monetary range of awards. Make sure that you're eligible to apply and that the planned project is compatible with the emphases of the agency/program.

Limited (restricted) proposal submissions: When a grant program limits the number of proposals or letters of intent it will accept from an institution, researchers wanting to apply to the program are required to submit a Notification of Intent to Apply to a Grant Program form to OSPA 45 calendar days in advance of the deadline. See the policy on Limited Proposal Submissions for details. If notifications exceed the proposal limit, the Office of the Vice Chancellor for Research will appoint a committee to review the submissions and determine which will go forward to the agency. Check the grant program guidelines carefully for any such agency limits.

Use the resources available to you. As you prepare to write the grant proposal, it's helpful to talk with colleagues who have had grants, especially those who have obtained funding from the same agency or program. Department chairs and associate deans for research may have valuable advice. OSPA's project specialists have grants experience and keep current on agency programmatic emphases. Reading successful proposals submitted to the same agency you have targeted, or in the same area of endeavor, can be enlightening. OSPA maintains a file of proposals that researchers may review on-site.

Also **contact the appropriate program officer** at the funding agency. Program officers represent a particular program or division in an agency; they coordinate proposal review and oversee funded projects in their area. Most agencies encourage prospective applicants to discuss ideas with a program officer before they submit a proposal. An e-mail or phone call is best, unless the agency or program guidelines specify formal written communications only.

Check the guidelines or the agency web site for the names and phone numbers of program officers, or contact your OSPA project specialist if you have trouble finding this information.

If your idea is not within the current scope of the agency, the program officer will tell you that. He or she may suggest another agency, discuss ways of reformulating the project, or recommend another program or division within the agency whose goals are more in line with your interests.

By following this process, you'll save time for yourself and for the program officer who will coordinate the proposal review. And, if the program officer advises you to proceed with the proposal, you will have someone in the agency who knows something about the proposal and can answer colleagues' questions about it.

2.6 Release Time and Cost Sharing

Early in the proposal process, you'll need to determine the level of financial and other support available from your department and college. Find out how much release time, if any, your department will allow you and others involved in the project. If the grant has cost-sharing requirements—i.e., if the funding agency requires the grantee or outside organizations to donate certain resources, contribute a certain dollar amount (common in equipment grants), or match the agency award—you must line up that commitment in advance. Read the costsharing guidelines in section 10 of this guide. Cost-sharing requirements vary from agency to agency. OSPA's project specialists can help you identify possible sources of matching funds, and the Office of the Vice Chancellor for Research and Graduate Dean offers a Matching Funds Program.

Note that if there is an SIUC contribution for the project, the fiscal officer making that contribution must sign the Proposal/Award Checklist before the proposal can be submitted. The only exception is for matching funds; to expedite matters, the Vice Chancellor for Research signs the Matching Funds Request Form but not the Proposal Checklist. See section 5, Proposal Submission.

Any SIUC cash match (e.g., from the Matching Funds Program) either must appear in the budget or must be cited in the proposal narrative or budget justification. It also must be indicated on the Proposal/Aw ard Checklist.

Section 3: Proposal Preparation

- 3.1 The Proposal Process: A Start-to-Finish Outline
- 3.2 What Do Funding Agencies Look for in Proposals?
- 3.3 Writing the Proposal Narrative
- 3.4 Preparing the Budget

- 3.5 <u>Research Compliances</u>
- 3.6 Assurances, Representations, and Certifications
- 3.7 Completing the Grant Application

3.1 The Proposal Process: A Start-to-Finish Outline

Careful preparation of proposals—from project design through proposal submission—is paramount to success in getting funded. To make the process run smoothly, we suggest that principal investigators (Pls) use the following guidelines. Note that you must allow sufficient time for review by your chair and dean and review and submission by OSPA.

- When you've found a grant program to which you'd like to apply, obtain and review the program guidelines and application materials. Determine if the proposal will need to be submitted electronically to the agency; if so, you may need to register with that agency's system. If you need assistance, contact OSPA.
- If the grant program limits the number of proposals or letters of intent it will accept from an institution, you must submit a Limited Submission Notification Form to OSPA 60 calendar days in advance of the deadline. See the policy on Limited Proposal Submissions.
- Even if submissions are not limited by the agency, we recommend you contact the OSPA research project specialist assigned to your college, and let him or her know what program you will be applying to and where the guidelines can be obtained. If you wish, he or she will be happy to meet and discuss ideas about the proposal. (OSPA's Proposal Submission Policy requires that you notify your OSPA contact at least one week before you plan to submit a grant proposal.) It is also often a good idea to discuss your ideas briefly with the program officer at the granting agency before you begin working on a proposal.
- If special University resources or cost sharing will be required for the project, get those commitments lined up with your chair or dean. Do the same for any third-party commitments or subcontracting institutions that the project will involve.
- If the agency requires that the University assume the project after the grant ends, you should get your chair and dean to agree to that arrangement before you begin working on the proposal.
- Extra time planning is a good idea when the proposal:
 - involves several investigators or other institutions.
 - involves an especially complicated budget or matching funds.
 - requires unusually extensive agency certifications.
 - is required by the agency to be submitted electronically, in part or in whole, and you have not previously been through the process with that agency. In such cases, alert your OSPA project specialist that you are working on an electronic submission. Read Special Notes on Electronic Proposal Submission for some issues to be aware of.

- Prepare a draft of the proposal. See Section 3.3 below entitled "Writing the Proposal Narrative" for an outline of the process. If you need more guidance, talk to your colleagues.
- If you allow time to circulate the proposal for internal peer review, you may be able to improve the proposal—and your chances of being funded—by taking colleagues' feedback into account.
- Prepare a draft of the budget using an Excel Spreadsheet. See section 3.4 below, Preparing the Budget. To assist you, OSPA has posted a Standard Budget Template with instructions. If you need more guidance, meet with your OSPA project specialist, or e-mail him/her a copy of the draft budget spreadsheet for review and comments. Allow time for making the suggested changes!
- If you need matching funds from the Vice Chancellor for Research, complete the request form on OSPA's web site and send it and the necessary attachments to the VCR's office. Allow as much lead time as you can. Your request will be more likely to receive funding if your chair and/or dean have given matching funds, too, and if the grant aw ard would generate full indirect-cost returns. Note that any match must be clearly indicated on the Proposal/Aw ard Checklist.
- Revise and complete the proposal and budget. If the application is electronic, be sure to follow the agency's directions for uploading sections. If you have difficulty, call OSPA.
- Fill out any forms required by the agency. (In many cases you will be completing forms online, on an agency's electronic submission system.) Call OSPA if you need assistance. Much of the institutional information you will need to fill out forms is available in section 4.1 of this guide.
- Research compliances: You must apply for and receive institutional approval if the proposed project will involve human subjects, human stem cells, vertebrate animals, hazardous biological, chemical, or radiological substances, or recombinant DNA. See section 5.1, #3.
- Complete and sign the Proposal/Aw ard Checklist. Contact your OSPA research project specialist if you have any questions about the form. Be sure to itemize all SIUC and third-party contributions, if any, on the checklist.
- Take a printout of the grant application (proposal narrative, budget, and agency forms) and the Proposal/Award Checklist, to your chair and dean for their review and signatures. See section 5 of this guide, Proposal Submission, for a list of things they will be looking for. Allow plenty of time in case they want changes before approving the proposal. OSPA recommends that you check with your chair and dean as to their deadlines for submitting your proposal for their approval.
- Bring the proposal, budget, and Proposal/Award Checklist to your OSPA research project specialist for review. Be sure to meet OSPA's deadlines for proposal submission.

- OSPA reviews the grant application to see if everything is in order. We make sure that the budget is accurate and conforms with University, state, federal, and funding agency policies. We check things like cost-sharing provisions. Then we provide the final institutional signature.
- Electronic submissions: OSPA "pushes the button" to submit the proposal or authorizes you as PI to do the same, depending on how the agency's system is set up.
- Nonelectronic submissions:

Completed nonelectronic (hard-copy) proposals must be brought to OSPA for review one working day in advance of the agency mailing deadline if all you need is proposal review and sign-off (see section 5.5). If you want OSPA to handle the mailing of the proposal, it must be brought to OSPA two working days in advance of the deadline. Copies of the signed proposal sent to the PI and department chair are in electronic PDF format. PIs are responsible for making any photocopies required by the agency and for mailing costs. See section 5.5.

3.2 What Do Funding Agencies Look for in Proposals?

As you write the grant proposal and prepare the budget, try to keep in mind the perspective of an agency reviewer. The following considerations can enable you to spot sections of the proposal that lack required information or that could be improved to strengthen the case for the project. Although every funding agency has its own criteria for review, these are key:

- Does the proposal clearly establish or document the need for the project? Does it make the case for what is innovative about the project? Would the project make an important contribution to its field?
- Are project objectives realistic and measurable? Do the objectives lead logically to the achievement of project goals?
- Is the project design adequate for achieving the project objectives? Do proposed activities build sufficiently on existing literature/research? Is enough information provided about the methodology to judge that it is sound and appropriate? Is data collection adequately planned, and is proposed data analysis appropriate for the aims of the project?
- Is a detailed timetable provided? Can the planned activities reasonably be carried out in the time allotted?
- Is institutional support for the project clearly indicated and sufficient?
- Is the function of the principal investigator described in detail? Does the PI have the qualifications and experience to carry out the project? What is his or her track record—publications, previous grant support—in the area of interest?
- Are other key personnel well qualified? Are staff resources sufficient and appropriate for carrying out the project, or does it seem likely that the project will be understaffed or overstaffed? Are job responsibilities and time commitments clearly delineated?

- Are the facilities and equipment adequate for the needs of the project? Is there a clear need for any equipment requested? Is the request reasonable?
- Are other resources adequate for the needs of the project? Is planned use of resources efficient and cost-effective?
- Are the costs reasonable? Are they adequate, or do they underestimate or overestimate likely project expenses? Does the budget justification present a clear rationale for the funding requested?
- Does the application contain all required sections and materials using the order, format, and terminology specified by the agency/program guidelines?
- Is the overall proposal well-written, logical, and persuasive?
- Is the proposal presented well, with easily readable type, clearly distinguishable subheads, sufficient margins, etc.? If the agency stipulates a minimum point size for text, a maximum title length, and so forth, does the proposal meet those requirements?

3.3 Writing the Proposal Narrative

Tailor your grant proposal to the funding agency you've targeted. The application guidelines will describe funding priorities and required project emphases. The guidelines also will set forth the requirements for proposals: page length, mandatory sections, etc. Follow the guidelines to the letter. Ignoring them is the fastest route to a rejection.

Often the funding agency will require a letter of inquiry, concept paper, or pre proposal first, rather than a full proposal. A letter of inquiry, sometimes called a query letter or letter of intent (LOI), briefly outlines your proposed research and requested level of funding. A concept paper, sometimes called a white paper, is usually more detailed and thus longer. A pre proposal is an abbreviated proposal. The program guidelines will set a page limit and specify what information is required. The agency will then request a full proposal or more information if it has some interest in your idea. Letters of inquiry, concept papers, and pre proposals that include budget figures or a commitment of University resources must go through the same institutional proposal review/sign-off process as full proposals. Otherwise, they may be submitted informally.

Noncompeting continuation applications often require only a progress report to the funding agency in order for the researcher to receive the next year's funding. Some agencies, how ever, require new budget pages, an updated proposal, or both. Such an application also must go through the institutional review/sign-off process. Check the program guidelines.

Every full proposal contains a narrative with various sections, a budget, and sometimes a cover sheet or appendices. Each agency has its own required proposal format. The sections described below are the most commonly requested.

1. Title page/cover sheet

The title should be succinct and reflect the basic purpose of the project. Some funding agencies limit the length of project titles. The agency may require you to fill out a cover sheet—a form with detailed information about the application. If not, include a simple title page as part of the proposal narrative.

2. Abstract/summary

Though brief (from 100 to 500 words, depending on agency requirements), the abstract is one of the most important parts of the proposal. It should give agency reviewers an overview of the project, including need, objectives, planned activities, expected outcomes, and plans for disseminating findings. Consequently, it should be written *after* these sections are complete. The abstract or summary should be understandable to colleagues outside your disciplinary niche.

3. Statement of problem or need; literature review

Why is the project needed? How will it make a significant contribution to the field? What new ground will it cover? How will it build on previous work? This section should answer these questions, making a strong case for the proposed project.

To show that a problem or need exists, this section generally includes a literature review describing relevant work in the field. Proposals for research projects, in particular, must demonstrate familiarity with related research and explain how the proposed project fits in. Proposals for training or service projects should document the need through statistical or demographic data.

The statement of problem or need should be specific, not general; concrete, not vague.

4. Goals and objectives

This section identifies what the project is intended to achieve. What are the expected outcomes? Both goals and objectives should be outlined here. Goals are general statements about ideal project outcomes. Objectives should be specific, measurable, and compatible with stated project goals.

5. Procedures/methodology

This section describes the planned project in detail and usually is structured chronologically. Activities related to each objective should be discussed. How will experiments be designed and conducted, services provided, training accomplished, etc.? What is the study population? Who are the participants? How will the work be organized? What is the time frame? What data will be generated, and what statistical techniques will be used to analyze the data?

This section is the heart of the proposal. The project design should derive logically from the stated problem or need and should lead clearly to achievement of the stated goals and objectives. Applicants often err in not providing enough solid, well-planned detail about the project design and methodology.

Another common mistake is setting an overly ambitious scope of work for the project period or the allowable budget. A proposal that crams five years of work into a three-year grant period marks the applicant as an inexperienced researcher. Funding agencies frequently reject such proposals out of hand, without even asking for revision. Colleagues can provide an objective "reality check" as you work to plan a well-paced, achievable project.

6. Personnel

This section describes the project team. What personnel will be needed, and at what time percentage? What qualifications must they have? How will they be selected? What duties will they perform? To whom will they report?

This section also should describe the background and qualifications of the principal investigator (and other key personnel already identified to work on the project) in relationship to the project goals and objectives. If the project will use consultants, this section should explain the need for them and should describe their credentials and unique qualifications in relationship to the project objectives.

7. Facilities and equipment; resources

What existing facilities and equipment will be used by the project? What advantages do they offer the project? What equipment, if any, does the proposal request funding to purchase or lease? Why is such equipment needed?

8. Dissemination of project results

Methods of sharing the findings or results of the project should be discussed. These might include project reports, journal articles, workshops, presentations at professional conferences, web sites, preparation of a manual or handbook, etc.

9. Plan for continuation of project/sustainability

Particularly in the case of training or service projects, many funding agencies want to see the benefits or activities of the project last beyond the funding period. In some cases, this is even a requirement for funding. If so, the proposal should outline a plan for continuation in which the grantee institution assumes greater financial responsibility for the project over time, or in which alternative means of funding (fund raising, fees, grants from other agencies, etc.) will be implemented.

10. Project evaluation

A plan for determining the effectiveness of the project must be presented. How will project staff or consultants evaluate whether the objectives have been met? What kinds of data and other information will be collected, and how will they be analyzed? The proposal may include plans for both ongoing evaluation (so that any needed changes can be made to the project) and final evaluation. These activities may be carried out by project personnel or an external evaluator.

11. Budget and budget justification

See the following section. Budgets can be quite complex, and they require knowledge of typical costs and of University fiscal policies. The budget also depends on the project scope and design.

12. Appendices/attachments

Some funding agencies require you to include certain material—article reprints, for example as appendices. Otherwise, include appendices only if the agency allows them (some do not), and keep them brief. Use only directly relevant supporting material that will strengthen the case for the project. In proposals for training or service projects, for instance, this is the place for letters of endorsement from participating organizations or prominent individuals. Curricula vitae for key personnel occasionally are included in the appendices, but more typically go in a section within the proposal itself. Do not use appendices to circumvent the agency's page limit for proposals. Some funding agencies do not require reviewers to read appendices.

Allow plenty of time for revising, editing, and proofreading the proposal. Sloppy writing, illogical organization, inaccurate references, unnecessary jargon, and typos are obstacles that frustrate reviewers, undercutting support for even the best of ideas.

3.4 Preparing the Budget

Although budget preparation is your responsibility as the PI, you may want to discuss the project and budget in advance with your OSPA project specialist. This can help you better determine project costs and ensure that the budget will conform to University fiscal policies, reducing or eliminating the need for last-minute revisions. Project specialists will also review a draft budget if you e-mail it to them. All final proposal budgets are checked at OSPA before the institutional signature can be obtained and the proposal submitted to the agency. See section 5 of this guide, Proposal Submission.

OSPA's web site posts an Excel budget spreadsheet with SIUC's fringe benefit rates and the standard on-campus F&A (indirect cost) rate built into the formulas. Spreadsheet instructions are available as Word or PDF files.

As an estimate of project costs, the budget should reflect the decisions you have made in planning the project. Be sure to read the cost-sharing guidelines in section 10 of this guide before getting into budget details. Budget considerations can affect many aspects of the proposal, including the scope of work planned, the anticipated time frame, and the personnel involved.

Every budget expense must be supported by the proposal narrative. When you write your budget justification (see item #9 below), you will need to refer back to the proposal to justify how you arrived at your budget figures: why given personnel are needed at the percentages indicated, how new equipment will be used, why you are requesting the amounts you are for travel, supplies, etc.

The budget should reflect the principle of "best-effort" work within the specified time frame. Once the budget becomes part of an award agreement, it represents a legal commitment. Personnel must be involved on the project to the extent indicated, equipment must be purchased as specified, and so on. Some funding agencies allow fairly wide latitude in reallocating funds between budget lines, but others strictly limit or don't allow reallocation.

Standard budget items are grouped in different ways by different funding agencies. Here are the most common, along with the considerations they involve. As the principal investigator,

you'll need to address these questions before the final budget can be prepared. They must be worked out in relation to two overriding concerns: (1) the funding limit imposed by the sponsor, and (2) the project time frame and goals.

1. Salaries and wages

What personnel will be involved? What percentage of each individual's time will be contributed by the University, and what percentage will be requested from the funding agency? Note that base salaries of current faculty and staff may be adjusted for future budget years for reasonable inflation (ranges from 3% to 5%).

Faculty: Cost is expressed as monthly salary X percentage of time X number of months on the project. Cost sharing of faculty time on budgets is based on the percentage of effort that faculty will contribute to the project during the time that the University is paying their salary—generally 9 or 12 months. See cost-sharing guidelines. The percentage of faculty time committed on grants and contracts, whether charged to the agency or contributed by SIUC, cannot total more than the percentage of time approved by their department and college for research activities. This percentage of effort should be based on the size of the project, and should be agreed upon by the chairs of the departments/units involved. The percentage of time cited in the budget for all project personnel is a legally binding, auditable commitment.

Administrative/professional staff: Includes <u>researcher/scientist classifications</u> and other types of positions. Cost is expressed as monthly salary X percentage of time X number of months on the project.

Civil service staff: Cost is usually expressed as an hourly rate X number of hours per month X number of months on the project.

Postdoctoral fellows: Compensation for postdoctoral fellows is negotiable, but must be at least the full-time monthly rate for doctoral-level graduate assistants in the principal investigator's department. Cost is expressed as monthly salary x percentage of time x number of months on the project. Although a fellow may work on more than one grant, postdoctoral fellowships are 100%, 12-month appointments (i.e., there are no part-time postdoc positions).

Graduate assistants: Salary rates vary by level (master's vs. Ph.D.) and by unit. Graduate students on grants are paid the rate set for the principal investigator's department. Cost is expressed as monthly salary (100% salary in column B of the Excel spreadsheet) X percentage of time (50% is standard; put 0.5 in column D of the spreadsheet) X number of months on the project. Under a recently approved GA contract, principal investigators also must budget in 50% of the Primary Care Fee for each semester the GA will be employed; see our Graduate Assistantship Salaries page for estimates.

Student workers: Cost is expressed as hourly wage X number of hours per week X number of weeks on the project. (Student workers may not exceed 29 1/2 work hours per week and are usually limited to 20.)

External consultants: Payment is expressed as daily compensation rate X number of consulting days. On agency budget forms, external consultants generally are included

under "Contractual Services," "Consultants," or "Other." If the consultant is not an independent contractor, add a fringe benefits percentage to cover Social Security and Medicare contributions (see "Fringe Benefits" below). Travel costs and lodging/meal allow ances for external consultants are typically budgeted under "Contractual Services" rather than under "Travel."

2. Fringe benefits

What personnel on the project will require a fringe benefits allow ance to be included in the budget? Fringe benefits include medical/dental/life insurance, and retirement/Medicare contributions.

Fringe benefits must be budgeted in grants for all faculty, A/P staff, civil service staff, postdoctoral fellows, extra-help employees, internal consultants, and retired SIU employees who have salary being charged to the grant. If the grant includes salary for such personnel (including the principal investigator), it must also include the appropriate amount for fringes.

Under a recently approved GA contract, principal investigators also must budget in 50% of the Primary Care Fee for each semester the GA will be employed; see our Graduate Assistantship Salaries page for estimates.

Fringe benefits are not provided to student workers.

In the case of internal consultants, external consultants, and retired SIUC employees who do not have salary being charged to the grant, consult your OSPA project specialist.

3. Equipment

Is equipment an allowable expense under the grant program guidelines? If so, give exact specifications for any equipment that must be purchased or leased to carry out the project. On federal grants and contracts, equipment or equipment components costing less than \$5,000 are categorized as commodities. The equipment threshold on nonfederal grants and contracts may be lower and varies. Check the program guidelines.

4. Travel

Will the project involve some travel? If so, the following must be considered: number of trips; length (day trips vs. overnight); destinations (domestic vs. foreign travel, metropolitan vs. rural areas); type of transportation; number of persons traveling. These considerations will affect the per diem and lodging allowances requested.

Domestic travel reimbursement limits are posted on SIUC's <u>travel web portal</u>; see "Travel Regulations and Policies," then "Reimbursement Schedule." International per-diem/lodging limits are posted on this <u>State Department web page</u>. Note that the figures given are *maximums*. If you're familiar with the country you're traveling to, use figures that you know to be more realistic (and affordable).

5. Commodities (materials and supplies)

What goods and supplies are needed for the project? This category includes costs incurred for materials, supplies, and fabricated parts necessary to carry out a sponsored agreement. It

also covers equipment up to a certain cost threshold, depending on the grant (see "Equipment," above). Only materials and supplies actually used for the performance of a sponsored agreement may be charged as direct costs. Office or general purpose supplies are considered to be indirect costs and are normally not allow able.

6. Contractual services

What services will be required by the project? This category covers a host of items, including software, photocopying, postage, telephone service, fees for research facility services, lab testing fees, payments for participants in research experiments, fees for external consultants, page charges for journal articles, subcontracts, etc. (Note: On agency budget forms, this category often is headed "Other Direct Costs" or "Other Expenses.")

7. F&A (indirect) costs

SIUC's federally negotiated facilities and administrative (F&A) cost rate, more commonly referred to as indirect costs or overhead, is applied to funding requests made to external sponsors. The F&A rate varies depending on whether the project is for research/training or for other activities and whether its primary activities will take place on or off campus.

If the agency's standard allowable rate is lower than the relevant institutional rate, you must provide OSPA written documentation of the agency's official public policy on F&A costs reimbursement. OSPA project specialists do not negotiate modifications to SIUC's F&A cost rates; approval to modify the rate for a specific project can only be given by the OSPA director.

In the case of full F&A cost recovery, the relevant institutional rate is applied on the proposal's modified total direct costs (MTDC), which exclude the following budget items: equipment, space rental costs, capital expenses, stipends, tuition waivers, and subcontract amounts in excess of \$25,000. If the agency's reimbursement rate is lower than SIUC's federally audited rate, no budget items are excluded from total direct costs unless the agency's policy stipulates otherwise.

8. Cost-sharing provisions

Does the funding agency require that the University or outside organizations contribute a certain percentage (match) of the cost of the project? Make sure you're familiar with the cost-sharing guidelines in section 10 of this guide.

Most of SIUC's cost sharing involves salary and fringe benefit contributions for the faculty who will work on the project. Percentage of faculty time devoted to the project should be as accurate an estimate as possible; this is a legally binding, auditable commitment.

Other cost sharing involves a cash match by the University—e.g., for equipment or non-key personnel such as GAs and researchers. Some agencies don't want to see matching funds included in the budget. All match, whether reported to the agency or not, should be included on the Proposal/Award Checklist at the proposal submission stage.

Please note the National Science Foundation no longer allows the inclusion of voluntary cost share. Per the Grant Proposal Guide, effective in January 2011, "In order to assess the scope of the project, all organizational resources necessary for the project must be described in the

Facilities, Equipment and Other Resources section (II.C.2.i). The description should be narrative in nature and must not include any quantifiable financial information. Mandatory cost sharing will only be required when explicitly authorized by the NSF Director."

Still other cost sharing involves third-party commitments of time, cash match, or donations. In working with parties external to the University, be aware that **principal investigators must monitor and account for any time or money contributions from outside sources during the course of the project.**

9. Budget justification

Most funding agencies require that a budget justification accompany the budget. This section of the proposal gives the rationale for the requests made in the budget. It explains the need for the items budgeted in terms of the planned project activities. The budget justification enables the agency reviewer to determine if projected costs are adequate and reasonable. It's a good idea to use the same categories on the justification pages as the agency uses in its budget forms.

3.5 Research Compliances

The government and the University require institutional approval for research projects that will involve human subjects, human stem cells, vertebrate animals, or hazardous biological, chemical, or radiological substances (including recombinant DNA). Obtaining these research compliances is the responsibility of the principal investigator. Some funding agencies will not review proposals that lack necessary institutional approvals or will not make the grant aw ard unless approvals are in place. In all cases, the research project cannot begin nor will access to grant funds be allowed without documentation of necessary compliances.

3.6 Assurances, Representations, and Certifications

Numerous legal **assurances**, **representations**, **and certifications** must accompany most proposals. For example, various forms may be required by the agency to assure that SIUC maintains a drug-free workplace, that it is not a debtor institution, that it complies with equal opportunity legislation, etc. Representations and certifications may require other information about the institution, such as details of its accounting procedures, travel policies, etc.

With electronic applications, the agency usually requires the PI to fill in information for necessary forms as part of the online application package. For nonelectronic proposal submissions, the PI often must fill out hard-copy forms that require signatures from the OSPA director, or in some cases must get copies of forms from OSPA. If you need guidance, please call your OSPA research project specialist.

3.7 Completing the Grant Application

As you assemble the grant application package, make sure you have followed the funding agency's requirements for preparing the proposal narrative, budget, and application forms. Read "<u>Is the Grant Application Ready for Review?</u>" located in section 5.1 of this guide, as a final check.

Whether the grant application will be submitted electronically or not, you will be circulating a hard copy (narrative, budget, forms) with a Proposal/Award Checklist to your chair and dean for review and signatures, and then to OSPA for review and the final institutional signature. Be aware of OSPA deadlines for proposal submission.

Section 4: Facts and Figures for Proposals

- 4.1 Institutional Identifications
- 4.2 Rates for Proposal Budgets
- 4.3 <u>University Overview</u>
- 4.4 Research Capabilities and Outreach

4.1 Institutional Identifications

Number Identifications		
Federal ID Number (FEIN)	37-6005961	
Tax Exempt Number (Proposals may require inclusion of SIUC's <u>state</u> or, more commonly, <u>federal</u> tax exemption letters)	E9990-8433-05 (Illinois Dept. of Revenue)	
DUNS (Data Universal Numbering System)	939007555	
FICE Institution Code	001758	
CAGE Code	3NDX8	
Illinois Dept. of Human Rights (IDHR) Bidder Eligibility Number	110743-00	
DHHS General Assurance for the Use of Human Subjects (Institutional Review Board Number)	FWA 00005334	
DHHS - PMS PIN	0N00P	
Animal Welfare Assurance Number	A-3078-01	

National Science Foundation Institutional Code for 0017582000 SIUC

J-1	Visa	Number	

P-1281

Radiation Safety Number	IL-01633-01	
Other Identifications/Assurances		
Applicant Organization	The Board of Trustees of Southern Illinois University	
Applicant Address	c/o Office of Sponsored Projects Administration, Mail Code 4709, Woody Hall C-206, Southern Illinois University Carbondale, 900 S. Normal, Carbondale, IL 62901	
Applicant Telephone, Fax, and E-mail	phone: (618) 453-4540; fax: (618) 453- 8038; e-mail: orda@siu.edu	
Authorized Institutional Representative	John A. Koropchak, Vice Chancellor for Research and Graduate Dean, for Rita Cheng, Chancellor, Southern Illinois University Carbondale	
Institutional Fiscal Officer for Grants and Contracts	Jeff Tally, Grant and Contract Accounting, Mail Code 6812, Southern Illinois University Carbondale, 1202 Douglas Dr. East, Carbondale, IL 62901	
Carnegie Foundation for the Advancement of Teaching: 2005 Designation	Research Universities—High Research Activity (second-highest tier)	
Southern Illinois University established	1869	
Facilities and Administrative Costs (Indirect Costs) Rate Agreement - date signed	March 31, 2008, by DHHS (U.S. Dept. of Health and Human Services)	
Misconduct in Science filed	January 5, 2011	
Is organization delinquent on any Federal debt?	No	
Is organizationdebarred, suspended	No	
Affirmative Action Plan	3/1/2010 - 2/28/2011	

NSF 9-digit Place of Performance Zip Code	62901-2586		
Congressional/Legislative Information			
U.S. Congressional District	IL-012		

U.S. Representative	Jerry Costello 2408 Rayburn Bldg., Washington, DC 20515 <u>web site</u>
U.S. Senators	Richard Durbin 309 Hart Senate Bldg, Washington, DC 20510 <u>website</u>
U.S. Senators (Cont.)	Mark Kirk 387 Russell Senate Bldg, Washington DC, 20510 <u>website</u>
Illinois Senate District	58
State Senator	Dave Luechtefeld 700 N. Front St., Okawville, IL 62271 <u>web site</u>
Illinois House District	115
State Representative	Mike Bost 300 E. Main St., Carbondale, IL 62901 <u>web site</u>

4.2 Rates for Proposal Budgets

- Facilities & administrative (indirect) cost rates
- Fleet vehicle rental rates
- Fringe benefit rates
- Graduate assistantship stipends
- <u>Researcher/scientist salary minimums</u>
- <u>Travel reimbursement rates, Illinois & out-of-state</u> (click on "Travel Regulations," then on "Reimbursement Schedule")
- <u>Travel allowances, international</u> (these are maximums)

4.3 University Overview

Southern Illinois University Carbondale (SIUC) is a comprehensive university with nationally and internationally recognized instructional, research, and service programs. Chartered in 1869 as Southern Illinois Normal University, a teachers' college, the institution was renamed Southern Illinois University (SIU) in 1947 and it awarded its first doctoral degree in 1959. In the early 1970s, SIU expanded into a two-institution system comprising SIUC, which also has a School of Medicine at Springfield, and Southern Illinois University Edwardsville, which also has a School of Dental Medicine at Alton and a center in East St. Louis.

SIUC is fully accredited by the North Central Association of Colleges and Schools and is a member of all major associations for higher education, including the Council of Graduate Schools and the National Association of State Universities and Land-Grant Colleges.

SIUC has one of the two most diverse academic program offerings in the state, according to the Illinois Board of Higher Education. We offer bachelor's degrees through more than 80 programs, master's and doctoral degrees through nearly 100 programs, and J.D. and M.D. degrees. Degrees are awarded through eight colleges (Agricultural Sciences, Applied Sciences and Arts, Business, Education and Human Services, Engineering, Liberal Arts, Mass Communication and Media Arts, and Science), the law school, and the medical school. Graduate degrees are awarded through the Graduate School.

Total University enrollment in fall semester 2010 was 20,037: 15,137 undergraduate students and 4,900 graduate and professional students (*Institutional Research, http://www.irs.siu.edu/quickfacts/byClass.aspx*).

As of fall 2010, total minority enrollment stood at 28.56% of the undergraduate student population, 14.86% of the graduate student population, and 15.8% of the professional student population (*Institutional Research, http://www.irs.siu.edu/quickfacts/race_eth.aspx*). SIUC ranks 33rd among all U.S. colleges and universities in awarding baccalaureate degrees to African-American students. We also rank 1st among U.S. colleges and universities in the number of education baccalaureates awarded to African-American students and 26th in health professions and related clinical sciences degrees awarded to African-American students (*Diverse: Issues in Higher Education, data from 2008-09 academic year*). In addition, SIUC is 4th in education degrees earned by all minority students.

Fall semester 2010 enrollment included 1,255 international students (*Institutional Research, http://www.irs.siu.edu/quickfacts/race_eth.aspx*), and the University has numerous international linkages and faculty/student exchange agreements.

For detailed institutional data, see the Institutional Research and Studies web site.

4.4 Research Capabilities and Outreach

SIUC is classified by the Carnegie Foundation for the Advancement of Teaching as a Research University—High Research Activity, the second-highest tier. We rank #115 among public universities in the United States for total R&D expenditures, and #201 among all U.S. universities (*National Science Foundation, Academic Research and Development Expenditures: Fiscal Year 2009, July 2011*). This places us within the top 4 percent of U.S. higher education institutions for research endeavors.

FY 2010 external grant and contract awards to SIUC totaled nearly \$80 million (excluding Financial Aid Office awards). Some \$41.2 million supported research projects, \$9.7 million supported training and instructional projects, and \$29 million supported outreach/service and other projects. Find the most recent grant data, as well as data from past fiscal years, on OSPA's grant funding web page.

The Office of Sponsored Projects Administration (OSPA), a unit of the <u>Office of the Vice</u> <u>Chancellor for Research and Graduate Dean</u>, coordinates external grants and contracts, oversees compliance issues, and offers numerous research-related services. We also administer internal funding programs for faculty, and we coordinate <u>REACH</u>, an undergraduate research program that offers small grants to students. The Vice Chancellor for Research administers a Matching Funds program for grants and a New Faculty Startup Program. For additional information about these programs, see the "Find Funding" page on our website or for student funding opportunities see the "Student Research" page on our website.

SIUC's 20-plus research centers span the gamut from workforce education and global media to wildlife ecology and coal research. Many focus on interdisciplinary work. See our <u>full list of research centers and institutes</u>, which also includes a listing of research consortia to which SIUC belongs, and a listing of external research organizations based at or administered by SIUC.

Campus researchers have access to the services of several <u>research support facilities</u>, some centrally administered and some housed within colleges or departments. Their services range from equipment fabrication to DNA sequencing, electron microscopy to laboratory animal care.

<u>Morris Library</u>, an open-stack, subject-division library, is a member of the Association for Research Libraries. It has holdings of more than 2.6 million volumes, more than 3.6 million microform units, and more than 36,000 current serials (including electronic resources). It is a depository for federal, state, and United Nations documents and houses the archives for Illinois' southernmost 22 counties as part of the Illinois Regional Archives Depository system. Special Collections contains internationally known manuscript and book collections in American philosophy, First Amendment freedoms, and modern American, British, and Irish literature.

<u>Information Technology</u> maintains an extensive website about <u>computing services</u> available to faculty and students. SIUC is a member of Internet2, and SIUC researchers also have access to supercomputing facilities at other institutions.

The <u>Center for Teaching Excellence</u> provides instructional technology development and support for faculty, including resources for web design and programming, video production, digital imaging, and curriculum design and instruction. In addition, the New Media Center at SIUC operates two multimedia computer labs to support teaching and research. The <u>College</u> of <u>Liberal Arts NMC</u> focuses on faculty training and coursew are development; the <u>College of Mass Communication and Media Arts NMC</u> focuses on development of new applications and creative and research activity.

The <u>Division of Continuing Education</u> coordinates over 200 non-credit conferences, workshops, and programs each year to residents of the region and continues the University's commitment to lifelong learning.

The <u>Office of Distance Education and Off-Campus Programs</u> offers departmental courses for academic credit through distance education to members of the regional, state, national and global community.

The <u>SIUC Broadcasting Service</u> operates two public television stations and three public radio stations—WSIU-TV/WSIU-FM in Carbondale, WUSI-TV/WUSI-FM in Olney, and WVSI-FM in Mount Vernon—serving over 600,000 households in southern Illinois, southeast Missouri, and southwest Indiana. WSIU/WUSI-TV's Learning Services offers K-12 instructional series, Adult Learning telecourses, and community outreach programs, including PBS Ready-to Learn programming.

SIUC ranks among the top 125 universities in the nation in terms of patent activity and licensing revenues (*FY 2004 data, Association of University Technology Managers*). See OSPA's <u>Technology Transfer web site</u> for information. The <u>Southern Illinois Research Park</u> in Carbondale, which has the Dunn-Richmond Economic Development Center as its anchor, fosters high-tech startup businesses. In addition, the Dunn-Richmond Center offers incubator space to businesses and houses the Small Business Development Center.

Section 5: Proposal Submission

- 5.1 Is the Grant Application Ready for Review?
- 5.2 <u>Review by Chair and Dean</u>
- 5.3 OSPA Proposal Submission Policy
- 5.4 Special Notes on Electronic Proposal Submission
- 5.5 OSPA Review and Submission
- 5.6 Proposal Revision and Resubmission

5.1 Is the Grant Application Ready for Review?

The review/sign-off process applies to all grant/contract proposals. It also applies to preproposals or other preliminary grant applications, such as concept papers, if they involve budget figures or a commitment of University resources. Some noncompeting renew al grant applications also require sign-off, depending on agency requirements; check the program guidelines.

The principal investigator (PI) must complete the proposal, budget, and Proposal/Aw ard Checklist before circulating the grant application for signatures. The checklist is a routing/signature form that records key information about the proposal. A few issues to be aw are of:

- 1. Limited (restricted) proposal submissions: If the grant program you want to apply to limits the number of proposals or letters of intent it will accept from one institution, you should submit a Limited Submission Notification form to OSPA 60 calendar days in advance of the deadline. See the policy on Limited Proposal Submissions located under the "Find" category on our main webpage. If the notification deadline passes but the agency's proposal limit has not been reached, proposals are processed on a first-come, first-served basis. Put another way, there is no guarantee your proposal will be considered for submission unless you meet the 60-day deadline.
- 2. You must have approval from the Graduate School for any **graduate student tuition/fee waivers** associated with the project. (These are most often waivers for participants in training projects. Graduate assistants employed on a grant automatically receive tuition waivers.) Allow plenty of lead time—preferably a couple of weeks—to get Graduate School approval.
- 3. **Research compliances:** You must note on the Proposal/Award Checklist if the research involves human subjects, human stem cells, vertebrate animals, or hazardous materials (includes recombinant DNA). All such projects require internal review and approval. If a grant award is made for the project, a budget account cannot be established until all necessary approvals are obtained. Note that some agencies require approval before the proposal is submitted or before the award is made (the latter is the case with NIH and

NSF). Read program guidelines carefully.

4. You must disclose on the checklist whether you or any project employee, or any member of your/their immediate family, has a **financial interest in any business entity** sponsoring the research. If so, you or the employee must fill out an Annual Disclosure of Proposed Non-University Activities and Financial Interests form and return it to OSPA with the proposal. Disclosures that indicate a potential conflict of interest are reviewed and must be approved, or safeguards agreed upon, before a grant can be accepted. For more information on conflict of interest see Section 10 of this guide.

WHO SIGNS?

- The Proposal/Award Checklist must be signed by the PI, by any co-principal investigators named on the project, and by the chairs and deans of these individuals before it can be signed at OSPA.
- The Proposal/Award Checklist must be signed by any faculty and staff contributing time (key personnel) to the project and by the appropriate chairs of these individuals before it can be signed at OSPA.
- If the proposal involves SIUC contributions outside the department and college, the person with fiscal authority for the contribution also must sign the checklist. Exception: If the Vice Chancellor for Research makes a commitment of matching funds, he will sign the Matching Funds Request Form; to expedite matters, he does not sign the checklist.
- OSPA provides the final review and the official institutional signature on the Proposal/Award Checklist and the application itself for all grant/contract proposals. See the Section 10.11 for SIU's Policy on Institutional Submission of Grant/Contract Proposals and Acceptance of Awards.

5.2 Review by Chair and Dean

Review of the proposal by the department chair and college dean should be thorough, not perfunctory. If funds are awarded, the proposal will become a legally binding document, and its provisions will be subject to funding agency audit.

Allow sufficient lead time. OSPA recommends that you check with your chair and dean as to their deadlines for submitting your proposal for their approval.

Department Chair's Review

The department chair's review and signature constitute departmental endorsement of all aspects of the proposal. The chair determines:

- If the proposal activity is within the broad goals and scope of the department or center and academic discipline. (NOTE: This condition is not intended to infringe in any way on the academic freedom of the PI. It is intended to clarify that the proposed activity should contribute to the mission of the department/center and academic discipline and not interfere with the capacity of the department to meet its responsibilities to students.)
- If the college and department can meet any obligations that the University may have to assume when the grant ends.

- If the PI and the department have the ability to carry out the project successfully.
- If salary arrangements for academic or summer support are reasonable and are not inflated by a higher-than-expected percentage.
- If the amount of personnel effort that is contributed (cost-shared) by SIUC is reasonable for the size of the project and if the amount of effort meets departmental guidelines. Personnel effort cannot add up to more than 100% for all activities—research, teaching, and service. Both the PI and the department chair should be familiar with the cost-sharing guidelines given in Section 10.20 of this guide.
- If the **personnel, matching funds, and facilities** for the activity, based upon the budget and budget narrative, are adequate and meet departmental guidelines.
- If there is adequate **space** available for the project.

Dean's Review

The dean acts upon recommendations of the department chair regarding use of space and facilities in the department. The dean's review determines:

- If the proposal activity meets the goals and is within the scope of the college. (NOTE: This condition is not intended to infringe in any way on the academic freedom of the Pl. It is intended to clarify that the proposed activity should contribute to the mission of the college and not interfere with the capacity of the college to meet its responsibilities to students.)
- If the budget, salary, and employment of present or proposed personnel are appropriate for the college.
- If the college and department can meet any obligations that the University may have to assume when the grant ends.

5.3 OSPA Proposal Submission Policy

Signature Authority

Grant proposals and awards are processed through the Office of Sponsored Projects Administration. (See the policy in Section 10.11 Institutional Submission of Grant/Contract Application and Acceptance of Awards.) All grant proposals, whether electronic or hardcopy, must be reviewed and approved by OSPA before going to the funding agency. Only the OSPA director or a designee has institutional signature authority for the grant application.

Even when a funding agency's electronic system gives principal investigators (Pls) the authority to submit their own proposals, for legal reasons OSPA approval is required first. Likewise, proposals that do not require an institutional signature still must be approved by OSPA before the PI submits the proposal to the agency. This is also the case when SIUC is a subcontractor with another institution.

OSPA Deadlines

1. Once you know you will be submitting a proposal, **notify the OSPA staff person** assigned to your department/college at least a week in advance of the agency deadline. If the proposal is to a limited-submission program, notification to OSPA is required 60 calendar days in advance of the agency deadline unless otherwise announced by OSPA.

2. Completed electronic proposals must be printed out and brought for OSPA review at least one working day in advance of the agency deadline. Allowing two or more days is strongly recommended; see the first two notes in section 5.4 below. A completed proposal includes the proposal narrative, budget, agency forms, and a fully signed Proposal/Aw ard Checklist.

OSPA cannot guarantee that the proposal will be submitted if you do not meet this deadline. Last-minute submissions can overload the funding agency's system, and may result in incomplete information being submitted and a whole host of other problems. OSPA cannot be held responsible in these situations.

3. Completed non-electronic (hard-copy) proposals must be brought for OSPA review one working day in advance of the agency mailing deadline if all you need is proposal review and sign-off (see section 5.5 below).

If you want OSPA to handle the mailing of the proposal, bring it two working days in advance. Pls are responsible for making any photocopies required by the agency and for mailing costs. See section 5.5.

4. Copies of the signed proposal will be sent to the PI and department chair in electronic PDF format.

Funding agencies assume a proposal has had adequate review and approval before the institution submits it. Proposals written haphazardly and without adequate review reflect unfavorably on the PI and the institution. When a researcher brings a proposal too late for adequate review, the director of OSPA may agree to sign the proposal to meet the agency deadline but **reserves the right to withdraw it from agency consideration** if it is found not to meet University guidelines and standards.

5.4 Special Notes on Electronic Proposal Submission

- The most common pitfall with electronic proposal submissions is bringing them in for signature at the last minute. We advise that you make your electronic application available to your OSPA project specialist for troubleshooting, at least a couple of days in advance of the agency deadline (the earlier the better). That allows the project specialist time to check for missing or inaccurate information and gives you time to make the necessary changes. Meeting OSPA's one-day submission policy for completed applications is essential.
- Allow time for the funding agency to process your registration, if required. Some agencies can take up to two days to process researchers' registrations.
- **NSF FastLane:** If a proposal is to be submitted via NSF FastLane, the PI must give OSPA access to the proposal and permission to submit it. The PI is responsible for uploading the narrative into the FastLane system and completing the forms. OSPA can make minor last-minute changes if the PI uses the "SPO edit" feature. See our FastLane guidelines located under the "resources" section under training and education.
- **Grants.gov:** Grants.gov proposals and other e-grant submissions that require OSPA uploading should be either e-mailed or brought to OSPA on an external memory device. The proposal should be complete, including the forms and budget. Pls must follow

agency submission guidelines when compiling the documents. See our Grants.gov guidelines located under the "resources" section under training and education.

• **Other electronic submissions:** Contact your OSPA project specialist for guidance. Remember, even when the agency gives PIs the authority to submit their own proposals, OSPA approval is required first.

5.5 OSPA Review and Submission

In submitting grant proposals to OSPA, be sure to follow the deadlines listed above. Here's what OSPA will review and the procedures we will follow.

- Your OSPA research project specialist reviews the **final budget** to ensure that it is accurate and that the correct fringe benefits and F&A rates have been used. (Remember that research project specialists will discuss budget needs and review draft budgets upon request. This can prevent last-minute problems during proposal review.)
- He or she reviews the **budget narrative** and other parts of the proposal to ensure that the proposal conforms with University and agency policies.
- He or she reviews the **Proposal/Award Checklist** pages, including the appropriate signatures from chairs and deans, and checks compliance statements to ensure that appropriate regulatory committees (e.g., human subjects, animal care, etc.) have reviewed and approved the proposed research where necessary or that the review is pending.
- As mentioned in section 5.4, proposal submission can be jeopardized when an application is brought to OSPA with missing or inaccurate information. We do not want to see anyone's proposal miss the agency deadline. Consequently, although we *require* only one day of lead time, we *strongly recommend* that you give your OSPA project specialist access to the application two or more days in advance of the agency deadline. This allows time to troubleshoot the application and gives you time to remedy any problems.
- After review, the OSPA director provides the official **institutional signature** on the Proposal/Award Checklist and the grant application itself.
- For electronic proposal submissions, OSPA either **"pushes the button"** to submit the proposal **or authorizes the PI** to do the same. Which party submits the application depends on how the agency's electronic system is set up. PIs are not to submit proposals without OSPA authorization.
- For non-electronic proposal submissions, OSPA will mail the proposal if you give us **two working days** of lead time. Otherwise, mailing is your responsibility as Pl. Note: Campus Mail's daily delivery time to the Carbondale post office is 3:30 p.m. **Important:**
- The PI is responsible for photocopying any hard copies required by the funding agency.
- The Pl is responsible for paying postage for mailing the application and must supply an account number to charge for the postage if OSPA is doing the mailing.
- OSPA will send copies of the signed proposal to the PIs and department chair electronically, in PDF format.

5.6 Proposal Revision and Resubmission

Many faculty and staff with an excellent record of grant funding did not succeed on their first, second, or even third attempts. Rejections can seem devastating, but they can be used as a valuable learning opportunity.

See Proposal-Writing Tips located in our Resources section for some good information about the agency review process. If your proposal is turned down by a funding agency, request the reviewers' comments and seek feedback from the program officer. If the agency discourages resubmission, consider finding an alternative funding source or modifying your project idea or approach. The program officer and your colleagues may be able to give you suggestions in this regard.

If the agency is encouraging about resubmission, your chances of success on a second goround are good. Respond specifically to reviewers' comments in the narrative of the revised proposal. Point out changes made to strengthen the proposal in the areas judged to be weak, and clarify information that may have been misinterpreted in the initial review. You can further help your cause by working closely with the program officer, being willing to rethink aspects of the project based on the agency's feedback, and being as objective as possible in revising the proposal.

Section 6: Award Negotiation and Acceptance

Award notices are usually forwarded by the funding agency to the director of OSPA or to the principal investigator. If you receive such a notice from the agency, **check with the OSPA research project specialist who worked with you on the proposal** to make sure that OSPA has received an award document. Award notices are reviewed by OSPA's research project specialists to ensure that the terms and conditions of the award agreement are acceptable to the University.

When the award is substantially the same as specified in the original or revised proposal no further signatures or approvals are required. However, some awards require further reviews, approvals, and/or negotiations before they can be accepted and processed.

1. Many grant applications go through some negotiation and revision before the award is finalized. When a funding agency decides to support a project, it may fund the project at a different level from that requested (usually at a reduced level). It also may want changes in the proposed work or in the services to be provided by the project. The agency will notify the University of its desire to negotiate the award agreement. At that time, a representative of OSPA, in cooperation with the principal investigator, will contact the negotiator for the funding organization.

If the agency simply wants a minor budget reduction, the SIUC representatives usually can agree to the changes on a verbal basis. If the budget reduction is major, how ever, a corresponding reduction in the scope of work may be required, which will necessitate

some revisions to the proposal as well as the budget. The revised proposal must then go through the same review and sign-off process as for the original proposal.

- 2. Any increase in the dollar amount of the University match or in the portion of the overall project cost contributed by the University requires approval. The principal investigator must obtain written approval from the unit providing the funds. Be aware of the cost-sharing guidelines in section 10 of this guide.
- 3. If the terms of an award agreement conflict with SIUC or state regulations, OSPA will negotiate changes with the funding agency. In some cases, OSPA must clear the award documents through University Legal Counsel or request review from other University departments.
- 4. Issues such as intellectual property ownership (patents, copyrights, licensing options, etc.), publication rights, and handling of proprietary information often must be resolved at this stage as well.
- 5. Remember that you must have received institutional approval if the project will involve human subjects, human stem cells, vertebrate animals, hazardous biological, chemical, or radiological substances, or recombinant DNA. Access to the funding will be denied and the project work cannot begin until any required conditions are met. See Section 5.1, #3, on research compliances.

OSPA serves as facilitator and liaison between the funding agency and the principal investigator. We handle any necessary subcontracts or actions requiring agency approval/notification such as budget reallocations, program adjustments, and time extensions. See section 7 of this guide, Account Set-up and Grant Management.

<u>Grant & Contract Accounting</u> monitors agency fiscal requirements, does agency billing where necessary to receive grant funds, and facilitates required fiscal reporting to the funding agency. An accountant will be assigned to help monitor your project.

If you have questions, contact the OSPA research project specialist who works with your college.

Section 7: Account Set-up and Grant Management

- 7.1 <u>OSPA Responsibilities</u>
- 7.2 Grant & Contract Accounting Responsibilities
- 7.3 <u>Principal Investigator (PI) Eligibility and Responsibilities</u>
- 7.4 Fiscal Officer Appointment and Responsibilities
- 7.5 Establishing an Account
 - 7.5.1 <u>Advance Accounts</u>
- 7.6 Account Budget Lines and AIS Information
- 7.7 <u>Rebudgeting (Budget Reallocation)</u>
- 7.8 Program Adjustments and Time (No-Cost) Extensions

- 7.9 <u>Subawards</u>
- 7.10 Project Reports
- 7.11 Invention Disclosures
- 7.12 <u>A-21 Cost Categories and Effort Distribution Reporting</u>
- 7.13 Property Control and Transfer of Equipment
- 7.14 Grant Records Management and Retention
- 7.15 Scientific Records Management and Retention of Data
- 7.16 <u>Audits</u>
- 7.17 <u>Closeout of Grant</u>
- 7.18 Transfer of Grant to or from SIUC

7.1 OSPA Responsibilities

When you receive notification of a pending grant or contract, contact the OSPA project specialist assigned to your college. Our office reviews, negotiates (if necessary), and processes sponsored project awards (see section 6 of this guide). When an award has been fully executed—meaning that the final award agreement has been signed by OSPA and by the funding agency—OSPA sends the award documents and a copy of the approved Proposal/Award Checklist to the Grant & Contract Accounting section of Accounting Services so that an account can be set up for the project. See Establishing an Account, below.

OSPA's research project specialist assigned to post awards works with principal investigators to issue any necessary subawards required by a project.

OSPA staff also assist with any budget reallocations, program adjustments, and time extensions that require agency notification or approval, serving as facilitator and liaison between the granting agency and the principal investigator. Contact the OSPA research project specialist assigned to your college with such issues or with any other questions you have about the overall administration of your sponsored project.

7.2 Grant & Contract Accounting Responsibilities

<u>Grant & Contract Accounting</u>, a unit of Accounting Services, sets up grant/contract accounts and administers the financial aspects of externally funded grants and contracts. An accountant is assigned to each grant or contract and is the fiscal officer's contact regarding the financial aspects of the grant. The accountant assists the fiscal officer by interpreting University and funding agency policies and procedures concerning fiscal practices and allow able expenditures. He or she helps to resolve any problems with the financial management of the grant or with the accounting reports generated in relation to the project.

Grant & Contract Accounting pre-audits many proposed commitments by the fiscal officer, such as purchase requisitions and invoice distribution forms, before they are processed by the Purchasing Office or the Accounts Payable Office. If there are problems, such as commitments in excess of available funds, transactions are not processed but are referred back to the fiscal officer.

Grant & Contract Accounting handles certain budget reallocations and time extensions that do not require agency notification. It also prepares cash requests (billings) to funding agencies, prepares closeout documents when the grant ends, and prepares and files required financial reports.

Questions about the fiscal management of a grant or contract should be directed to the accountant assigned to the project (536-2351).

7.3 Principal Investigator (PI) Eligibility and Responsibilities

The principal investigator (sometimes called the project director on training and service grants) is the primary person responsible for the design, scientific/technical conduct, administration, fiscal accountability and reporting of a sponsored project.

Eligibility: Who Can Serve as a Principal Investigator

Position	Approvals
Faculty members with at least 50% appointment	No Additional Approval
Senior Scientists	No Additional Approval
Non research A/P staff	Supervisor Approval
Associate and Assistant Scientist	Chair and Dean Approval
Emeritus Faculty	Chair and Dean Approval
Adjunct Faculty	Chair and Dean Approval
Researchers*	Cannot serve as Pl
Post docs*	Cannot serve as Pl

Graduate students*	Cannot serve as Pl
Undergraduate students*	Cannot serve as Pl

* Unless the agency announcement specifies eligibility for one of the above (but not for SIUC classification purposes.)

PI Responsibilities

In administering a project, the PI is representing the University and is responsible for upholding the high standards expected of SIUC projects ("best-effort" performance). The overall scientific and administrative integrity of the project, including design and conduct, validity of results, and preparation of manuscripts, rests with the PI. His/her responsibilities include:

- planning expenditures properly (whether or not he/she serves as fiscal officer);
- training and supervising staff on the project;
- complying with the terms and conditions of the award;
- completing work in a timely fashion;
- determining authorship
- fulfilling the objectives and scope of work of the grant;
- ensuring the project complies with University, state and federal government, and funding agency policies and regulations, including but not limited to those relating to human subjects, animal welfare, hazardous materials and biosafety, occupational health and safety, conflicts of interest, civil rights, affirmative action, intellectual property, research misconduct, drug-free workplace, use of University property, electronic information privacy, and equipment purchases;
- maintaining and archiving data, including research records necessary to support patent activity (see section 7.15);
- ensuring quality control of all data and materials generated by the project;
- determining authorship:
- submitting reports to the funding agency as required in the award agreement; and
- observing any other legal stipulations in the award agreement, such as provisions concerning treatment of proprietary information and disclosure of patentable discoveries made in the course of the project.

If rebudgeting, program adjustments, time extensions, or changes in key project personnel become necessary on your grant, contact the OSPA project specialist assigned to your college as soon as possible.

7.4 Fiscal Officer Appointment and Responsibilities

The fiscal officer for a project agrees to assume responsibility for all financial matters for the project. His/her responsibilities include:

- The fiscal officer is responsible for all grant transactions and signs off on all fiscal and personnel paperwork. See sections 7.5 and 7.6 below.
- The fiscal officer is responsible for maintaining the financial resources to meet all commitments and ensuring the propriety of all transactions requested to be posted to the project account or as match for the project.
- The fiscal officer must monitor the funds available in the grant account and ensure that the account is not overexpended. If the fiscal officer overexpends the account or expends funds for unauthorized purposes, he or she must cover the cover the expenditure with appropriate departmental funds or appeal to the next level of authority for assistance in covering the expenditure.
- The fiscal officer also is responsible for the property (inventoriable equipment) charged to the account. See section 7.13 below, Property Control and Transfer of Equipment.

7.5 Establishing an Account

After an award is fully executed (i.e., signed by both OSPA and the funding agency), OSPA sends the award documents, OSPA budget and the Proposal/Award Checklist to Grant & Contract Accounting, which facilitates setting up a fiscal account for the project.

Grant and contract accounts are administered via the University's AIS (Administrative Information Systems) financial system. Grant & Contract Accounting assigns each grant an AIS budget purpose number (account number) and a related "fund number." The budget purpose number is used on hiring and fiscal forms and to look up information about account balances and expenditures on the central AIS web site. The fund number is also used to access certain information on this site. (For more information about AIS and monitoring grant accounts, see section 7.6 below.)

Once these numbers are assigned, the fiscal officer is free to hire staff and make expenditures in accordance with the terms and conditions of the award agreement and University policies. Remember that a grant account cannot be issued unless the project has received any necessary compliance approvals such as human subjects, human stem cells, vertebrate animals, hazardous biological, chemical, or radiological substances, or recombinant DNA.

7.5.1 Advance Accounts

To request a budget purpose number before the award is fully executed, the principal investigator must have verification in writing from the funding agency of the award amount and project start date, a completed Advance Account Request Form, and an approved Proposal/Award Checklist with a scope of work and budget. Unless there are unusual circumstances, the advance account is limited to three months with an appropriate budget to cover this time period. The PI must specify the account that would be used to cover any advance expenditures should the award not come through, as well as any advance expenditures later found to be unallowable under the award agreement with the signature. If your college does not agree to this provision, the account cannot be established in advance.

Note: For some types of contracts the State of Illinois is no longer allowing accounts to be set up for projects until the funding agency signs the final grant documents. Advance accounts are not possible in these cases.

7.6 Account Budget Lines and AIS Information

Budget accounts for sponsored projects (grants and contracts) are restricted-funds accounts, meaning that the money must be used as stipulated in the award agreement with the funding agency. Funds cannot be transferred from restricted-funds accounts to state accounts or vice versa.

When Grant & Contract Accounting sets up the account for the grant or contract, it translates funding agency budget categories (for such things as personnel, supplies, services, etc.) into the appropriate University budget lines for the account and allocates funds to those budget lines. Financial transactions can then begin. Before committing funds in any line, make sure that the expenditure is allowable on your grant or contract and that the line has sufficient funds.

The most common budget lines in grant/contract accounts are listed below. Not all accounts will include all of these lines. Also, some accounts may have other lines for special types of expenses. Each line is assigned a range of numerical "object codes" that designate certain types of expenses within the line.

- Salaries: 4100 codes. To pay faculty, A/P staff, civil service staff, postdoctoral fellows, graduate assistants, internal consultants, and external consultants who are not independent contractors.
- Wages: 4200 codes. To pay student workers.
- **Travel: 4300 codes.** To pay for airfare, lodging, and most other travel expenses for SIUC employees on grant business. Exception: University fleet vehicle rental is paid from the Operation of Automotive Equipment line.
- **Equipment: 4400 codes.** To buy nonconsumable (inventoriable) items, such as lab equipment, of \$5,000 value or over on federal grants; of lesser value on other grants (depends on the agency).
- **Commodities* : 4500 and 4600 codes.** To buy consumable goods and materials, such as laboratory supplies, office supplies, etc., and equipment costing less than the equipment threshold on the grant. Also to pay for printing brochures, letterhead, and other materials. Software and maintenance/repair parts are classified as contractual services, not commodities.
- **Contractual Services* : 4700 and 4800 codes.** To pay for services. This category covers many types of expenses, including software, telephone charges, photocopying, postage, fees for research facility services, lab testing fees, student/participant stipends, fees for external consultants who are independent contractors, travel expenses for students and other non-SIUC employees, conference registration fees, journal subscriptions, page charges for journal articles, and all supplies, fixtures, and parts used in conjunction with the repair and maintenance of real or personal property.
- **Operation of Automotive Equipment: 5100 codes.** To pay for Travel Service charges (University vehicles) and transit tickets.
- Telecommunication Services: 5300 codes.

[* The state's classification of commodities and contractual services can be confusing. When in doubt, check with your department or call Procurement Services to find out which budget line will be charged for the purchase of a given item or service.]

For information about hiring procedures, see Section 8, <u>Hiring Staff.</u> For information about procedures for paying travel expenses or buying equipment, commodities, and services, see Section 9, <u>Other Account Expenditures.</u>

Information about budget expenditures and account balances can be accessed via the <u>AIS</u> <u>web site</u> at any time, using the grant's budget purpose number and/or fund number of your grant. If you don't already have a user name and password to access grant information on AIS, fill out a <u>Request for New User Access to AIS</u> form and submit it to Accounting Services, mail code 6812.

Fiscal officers of grants have access to two monthly online reports, "Funds Available Report" and "Report of Transactions," to help them track grant expenditures and account balances. Email alerts are sent when these reports are available on the AIS web site.

7.7 Rebudgeting (Budget Reallocation)

As a grant project progresses, you may find that you need more funding in certain budget lines and less in others. Some rebudgeting can be handled at <u>Grant & Contract Accounting</u> without involving OSPA or the funding agency. Other rebudgeting requires agency approval. If you determine you need to rebudget between budget line items, follow these steps:

- contact the assignee for your area at Grant & Contract Accounting.
- GCA will review the request to determine if appropriate and if agency approval is required.
- PI prepares formal request using funding agency approved format. The request must include the justification for the request, the dollar amount to be transferred between budget line items, and the final revised budget lines. The justification should include why the funds are available for transfer.
- After request has been reviewed and approved by GCA it is forwarded to the OSPA project specialist assigned to your area.
- OSPA will obtain the authorized institutional signature and will forward the request directly to the funding agency.

7.8 Program Adjustments and Time (No-Cost) Extensions

Because sponsored projects involve formal agreements between organizations, program adjustments (changes in the scope of work or project period) must be coordinated through OSPA on behalf of the principal investigator.

A no-cost, extension is a program adjustment that involves no change in the scope of work and no additional funding. The only change is a delay in the end date of the project. If the funding agency must approve or be notified of a no-cost extension, the extension is handled through OSPA. Call the OSPA project specialist assigned to your college for assistance.

For fixed-fee accounts, which do not require agency notification, OSPA handles the first requested extension to assure that deliverables have been met. After that, any desired annual extensions are handled by Grant & Contract Accounting.

7.9 Subawards

Subcontracts or subgrants are issued by the University for collaborative grant/contract activities involving personnel at other institutions. When a subagreement (subcontract, subgrant, or memorandum of understanding) is required, the principal investigator should contact <u>Sonjie Schwartz</u> at OSPA, 453-4541, as soon as possible. The scope of work and budget for the subagreement are normally provided by the PI. If needed, OSPA will assist the PI in developing the scope of work and budget.

The use of subagreements ensures that all applicable grant or contract clauses are included to meet legal, financial, and reporting requirements. The OSPA director signs all subagreement documents on behalf of the University. OSPA will work with the subawardee's institution to implement the subagreement.

If you have been awarded a subcontract or have made subawards to other institutions from your prime award, you should read the suggestions below for subcontract management. You should also familiarize yourself with Subaward (Subrecipient) Monitoring Guidelines in section 10 of this guide.

Facilitating Work with Subcontractors

With advances in research and instruction comes the expectation that complex initiatives and project proposals will sometimes be required to solve researchable problems or meet scholarly needs. The challenge for the PI and, ultimately, the PI as a "project manager" when the proposal is funded, is to put together an effective solution or approach.

One strategy is to seek the collaboration of other researchers or scholars through subcontracts (or subgrants when grants rather than contracts are involved). These subcontractors can be used to accomplish work that may not be within the PI's expert area, to relieve the PI of some project tasks so he/she can work on other tasks, and to provide technical assistance using equipment, instruments, assessments, or analyses not available to the PI.

Most subcontract arrangements work well and add to the success of the project. Without careful project management by the PI, however, subcontract problems can outweigh the benefits. Keeping the following guidelines in mind can help.

Note: Throughout these guidelines, the terms "subcontract" and "subcontractor" can be used interchangeably with "subgrant" and "subgrantor." Subgrants are similar to subcontracts. Due to the nature of grant-funded research and scholarly projects, the obligation of the subgrantee to adhere to the scope of work is slightly less since grants are

inherently more flexible. How ever, the elements of the subgrant are essentially the same as those of the subcontract. Questions regarding this distinction should be referred to OSPA.

Terms

The project manager, usually the PI of the grant or contract, takes responsibility for oversight of the project throughout its duration. The project manager ensures that objectives are met within the specified time, that the costs incurred fit the budget, and that the quality of the project reflects well on the PI and the University and is acceptable to the funding agency.

Subcontractors are individuals, usually outside of the University, who perform a specific part of the project or provide a specific service needed for the project. Subcontractors are usually identified through the PI's personal contacts, past research or scholarly collaborations, and recommendations by others.

Subcontracts are formal agreements between the PI's institution and the subcontractor. The subcontract, at a minimum, must include a scope of work for the project, a description of the services or tasks to be performed by the subcontractor, and a schedule for deliverables, including any reports. The subcontract document must be executed by the University and the institution employing the subcontractor (or, if an independent subcontractor is used, by the subcontractor). Although monthly or quarterly progress payments or cost reimbursements are made at intervals over the time period of the contract, final payment for services normally occurs after it has been confirmed that the work performed by the subcontractor is satisfactory and in accordance with the terms of the subcontract agreement.

Successful Project Management

The relationship between the Pl/project manager and the subcontractor is key to the success of the subcontract. The Pl must work with OSPA to ensure that the subcontract includes a scope of work that clearly communicates what is expected of the subcontractor. To the greatest extent possible, the scope of work must be detailed, with time lines for accomplishing tasks and producing reports of results, and with methods, procedures, and analyses clearly specified.

The subcontract is a binding agreement between the parties involved. As such, the subcontractor must produce the work specified in the subcontract, and cannot be required to produce work that is not specified. It is in the best interest of the project and of the subcontract relationship that there be a clear specification of exactly what will be done under the subcontract. In addition, federal regulations govern subcontract monitoring.

However, it is important to remember that research and scholarly activities tend to evolve as projects progress. Overly restrictive subcontracts may not allow for changes in the scope of work that may be necessitated by new findings or unexpected developments during the project. A balance between a focus on subcontract requirements and a collaboration with the subcontractor throughout the project is also important.

When There Are Problems

Problems or concerns can arise on the parts of the project manager and the subcontractor during the course of the project. These problems may involve differences of opinion as to the quality or quantity of the work performed, the cost of the work, the timeliness of reports or

results, and the methods used in performing the work. It is not always possible to avoid problems, but the information contained above under "Successful Project Management" is a good starting point.

Other steps that might be used include the following:

1. Discuss the project with the potential subcontractor **before** submitting a proposal or working toward developing a subcontract relationship. One of the aims of such a discussion should be to determine if the potential subcontractor can perform the work needed within the time frame required. It is also important to know the subcontractor's strengths and weaknesses, possibly from other researchers or scholars who have worked with the subcontractor, to determine reliability, work quality, and cooperativeness.

2. If problems come up during the course of the project, talk with the subcontractor about what is needed and what is lacking in light of what was agreed to in the subcontract. Try to work out a suitable accommodation. If possible, keep on top of the work being performed so that any performance problems on the part of the subcontractor are identified early, not so late in the project that there is too little time for remediation. If the Pl/project manager also has responsibilities that affect the subcontractor's work, such as providing materials needed by the subcontractor, it is important that those responsibilities be taken seriously and met in a timely fashion.

3. If the problems involve work that is needed but not specified clearly in the subcontract, it may be difficult to get that additional work performed without a mutually-agreed-to subcontract modification or by voluntary compliance from the subcontractor. This is why it's critical to know the subcontractor's strengths and weaknesses before a subcontract is considered and to develop a good working relationship with the subcontractor.

4. If the problems are not resolved by talking with the subcontractor, discuss the problems with <u>Sonjie Schwartz</u> (453-4541). This is especially important since the problems may involve aspects of the subcontract language that might be needed to enforce performance requirements by the subcontractor. Sonjie also can be helpful in discussing the matter with the subcontractor's institution, business, or agency.

5. If the problems are not resolved, it may be necessary for the Pl/project manager, OSPA, and others (e.g., Grant & Contract Accounting, University Legal Counsel) to work together with the subcontractor's institution, business, or agency to determine what can be done to resolve the situation. This collaborative approach has been found to be more useful than the Pl working alone.

Typically, the subcontract must be relied upon as the basis for determining issues such as the quantity of work, adherence to the scope of work, and costs. Issues of work quality are more difficult to determine and may be more contentious, thereby requiring more time to resolve. However, every attempt will be made to resolve the situation if possible.

Sometimes situations cannot be resolved to everyone's satisfaction. In these cases, University Legal Counsel must provide guidance about the costs/benefits of different possible courses of action, and the University must consider issues such as legal liability, relations with the funding agency that may affect other faculty, previous or ongoing relationships with the subcontracting institution, business, or agency, and the fiscal magnitude of the issues involved.

A Final Note

Dealing with collaborators on research and scholarly projects is becoming more commonplace and expected, both by universities and by funding agencies. Because more people are involved, there are more opportunities for differences of opinion, differences in work style, and other personnel issues to arise. The guidelines above are intended to suggest ways in which smooth working relationships might be fostered between PIs as project managers and other researchers and scholars as subcontractors. OSPA staff can help significantly with the planning and administration of subcontracts.

7.10 Project Reports

Grant & Contract Accounting prepares and submits most **financial reports** on the project that are required by the funding agency.

The principal investigator is responsible for preparing and submitting all technical reports (progress and final reports) required by the funding agency. This is an important obligation.

Failing to turn in reports on a timely basis can result in the agency delaying or suspending final payments on the grant or contract. It also can jeopardize possible future funding from the agency, not just for the PI involved but for other researchers at the University as well. Check your award agreement to be sure you know when reports are due, what information is required, and what format is specified by the agency.

Some funding agencies now require electronic submission of progress and final reports. Allow extra lead time if you are new to that particular agency's electronic system.

7.11 Invention Disclosures

If a potentially patentable invention, product, process, or discovery results from your grant research, you are responsible for disclosing that invention to the University in a timely manner. If the award agreement requires it, OSPA's technology transfer office will report the disclosure to the agency sponsoring your work. All federal grants, and certain other grants, require an invention statement from the principal investigator that discloses whether any potentially patentable processes or materials were developed in the course of the project.

Most grants/contracts state the obligations and rights of both the University and the funding agency should the project result in patentable discoveries. For example, your award agreement may give the funding agency prior approval of the terms and conditions of any agreements concerning patentable discoveries resulting from the research they have sponsored. In such cases, the University negotiates with the sponsoring agency about future patent rights and licensing agreements. Points not specified in the award agreement with the sponsoring agency are subject to University policy.

Invention disclosures to the University should be made in writing to the Intellectual Property Committee through OSPA. [*Invention Disclosure Form*] The next higher University authority,

usually the department chair, must be informed in writing at the time the disclosure is submitted. See SIUC's Intellectual Property Policy for details.

Note that proper laboratory recordkeeping is crucial to legally defensible patent claims and protection in the case of a dispute over an invention. See section 7.15 below for information regarding proper laboratory recordkeeping.

Licensing agreements may be made with businesses in order to transfer technology (products or processes) from the University research laboratory to the marketplace. The University and the agency sponsoring a research project can negotiate licensing options as part of a grant or contract. See the <u>Technology Transfer web site</u> for information. The establishment of start-up companies based upon faculty research results is increasingly more common. Faculty interested in this should begin the process by contacting the technology transfer office.

7.12 A-21 Cost Categories and Effort Distribution Reporting

Information about effort reporting can be obtained from Institutional Research and Studies, 536-2384.

7.13 Property Control and Transfer of Equipment

The fiscal officer of the grant or contract is responsible for any property, such as inventoriable equipment, charged to the grant/contract account. A current inventory list may be obtained at any time by contacting the Fixed Asset Accounting section of Accounting Services (536-2351). See <u>Equipment Transactions</u> on the <u>Accounting Services web site</u> for helpful information about property control and equipment inventorying.

The University must have written approval from Central Management Services (CMS), a department of the State of Illinois, before any grant-purchased equipment may be removed from SIUC. Contact Fixed Asset Accounting to obtain a *Request to Permanently Transfer Sponsored Project Equipment with Researcher* form. The equipment may not be transferred until written approval is received from CMS. Transfer of equipment without this approval is a violation of state regulations.

7.14 Grant Records - Management and Retention

Grant & Contract Accounting holds award documents, fiscal reports, and related correspondence for three years after the account is closed. This time period conforms with federal and state agency requirements. After three years, documents are microfilmed and the hard copies are destroyed, *provided* that all audits have been completed and no litigation concerning the grant is anticipated. OSPA also holds project files for three years after the corresponding account is closed.

Likewise, principal investigators are required to maintain their project reports and other project files for at least three years after the project ends, and are urged to maintain them for a longer period of time. Also see the section below on scientific record-keeping.

7.15 Scientific Records - Management and Retention of Data

Following accepted guidelines for management and retention of scientific data can protect your intellectual property rights by establishing priority, help you survive an agency audit (see section 7.16), settle issues of publication credits for contributions to a project, and enable you to defend yourself against allegations of research misconduct. (It does happen.) In addition, many grant and contract agreements have stipulations about retention and use of data.

For guidance, check your award agreement and see the <u>Technology Transfer</u> website, which lists some web sites that have useful information about sound recordkeeping practices.

7.16 Audits

Agencies conduct various types of grant/contract audits.

- Fiscal audits simply look to see if the grant's books balance.
- **Compliance audits** are wider-ranging financial audits. They check to see that grant funds are being spent appropriately and as planned and that proper procedures are being followed for making the expenditures.
- **Program audits** look at grant administration to see if the project is fulfilling its objectives and scope of work—in short, if the principal investigator and his/her staff are doing the job they promised to do in the proposal. Program audits are the most farreaching of all agency audits and can be quite extensive.

If you're notified by the funding agency that it will conduct a fiscal or compliance audit of your grant or contract, contact Jeff Tally at Grant & Contract Accounting (536-2351). If you're notified that the agency will conduct a program audit, either contact Jeff Tally or contact Sonjie Schwartz at OSPA (453-4541, sonjie@siu.edu).

7.17 Closeout of Grant

All funding agencies have requirements that must be met to satisfy the terms and conditions required by most awards upon the end of the funded project. Typical close out documents may include the final financial report, final technical report, report of inventions, and final property reports.

• Final Financial Report

• Grant & Contract Accounting prepares and submits most financial reports that are required by the funding agency.

- It is the Fiscal Officer/Pl's responsibility to ensure all project costs have been posted.
- Fiscal Officer is responsible for reviewing and approving final financial report.

• Final Technical Report

- The principal investigator is responsible for preparing and submitting the final technical report required by the funding agency. This is an important obligation used to monitor and evaluate the project.
- Failing to turn in reports on a timely basis can result in the agency delaying or suspending final payments on the grant or contract. It also can jeopardize possible future funding from the agency, not just for the PI involved but for other researchers at the University as well.
- Check your award agreement to be sure you know when the final reports are due, what information is required, and what format is specified by the agency.
- Many agencies now require electronic submission of final reports.

• Report of Inventions

- Notify OSPA that report is required.
- PI certifies whether an invention resulted from the project.
- OSPA will complete and submit the required report to the funding agency.
- Final Property Reports
 - Contact your assignee at Grant and Contract Accounting.

For **grant/contract accounts other than fixed-fee accounts**, funds cannot be expended after the ending date of the award.

Funds in **fixed-fee accounts** generally are available to principal investigators after the ending date of the grant or contract. the PI is contacted annually to determine whether the account should be closed out. When the balance in a fixed-fee account drops below \$100, the PI is contacted and the account is closed out as soon as possible.

7.18 Transfer of Grant to or from SIUC

If you are an incoming faculty member bringing a grant to SIUC, or if you are an SIUC principal investigator who has accepted a position at another institution, contact <u>Sonjie</u> <u>Schwartz</u> at OSPA. There are established procedures for transferring the grant or contract to SIUC or to another institution.

Section 8: Hiring Staff

Note: ORDA does not set hiring policies or procedures. This section summarizes information from many University offices to help principal investigators find the information needed when working with the hiring process for various types of personnel. We make every attempt to **keep information up to date, but this is not the source of official policy on employment.** For full details, contact information, and official policies, links are provided to the appropriate offices and to the Employees Handbook.

Most of the forms used for hiring employees are fillable PDFs posted on SIUC's <u>Central</u> <u>eForms Repository</u> web site. (Instructions are available along with the forms.)

- 8.1 <u>Personnel Basics</u>
 - 8.1.1 Offices That Oversee Hiring
 - 8.1.2 Fringe Benefits
 - 8.1.3 Graduate Assistants
 - 8.1.4 <u>Student Workers</u>

8.1 Personnel Basics

8.1.1 Offices That Oversee Hiring

The following offices coordinate the hiring process for the various types of personnel who might work on a sponsored project:

- Research Faculty: University Affirmative Action Office (536-6618).
- Administrative/Professional Staff: University Affirmative Action Office (536-6618).
- Civil Service Staff: Employment/Classification division of Human Resources (536-3369).
- Postdoctoral Fellows: Graduate School Assistantship and Fellowship Office (453-4555).
- Graduate Assistants: Graduate School Assistantship and Fellowship Office (453-4555).
- Student Workers and Undergraduate Assistants: Financial Aid Office (453-4334).
- Internal Consultants: Continuing Education (536-7751).
- External Consultants: check with the Employment/Classification division of Human Resources (536-3369).

8.1.2 Fringe Benefits

Fringe benefits must be budgeted in grants for all faculty, A/P staff, civil service staff, postdoctoral fellows, extra-help employees, and retired SIU employees who have salary being charged to the grant. If the grant includes salary for such personnel (including the principal investigator), it must also include the appropriate amount for fringes. Fringe benefits are not provided in this manner to graduate assistants or student workers. Graduate assistant positions included in a project budget, must include the appropriate amount for the primary care fee. This fee is based on a per semester charge and should be included for each semester the graduate assistant is included in the budget.

Current fringe benefit rates and primary care fees are available on the main OSPA website under the "Apply" function. See budget preparation.

The SIUC Employees Handbook has more information on the University's benefits package.

8.1.3 Graduate Assistants

The duties to which a graduate assistant may be assigned include teaching, research, service, or administration and should be clearly defined at the time of the appointment. While the official title "Graduate Assistant" is used in all University documents to describe the various types of assistantships, for record-keeping purposes graduate assistants are designated as Teaching Assistants, Research Assistants, Administrative Graduate Assistants, or Graduate Interns.

Graduate assistants may be hired on a semester-pay or fiscal-pay basis. The position of graduate assistant demands an average time commitment of 20 hours per week for a standard 50% appointment and 10 hours per week for a 25% appointment. Monthly salaries vary by the student's level (master's vs. Ph.D.) and by the hiring unit. Assistantships are subject to annual salary increases pending availability of funds.

See sections I-III of the <u>Graduate Assistant Handbook</u> for full details about types of appointments, salaries, benefits (including tuition remission), and leave policies for GAs.

8.1.4 Student Workers

Student workers are paid biweekly from the wages budget line for actual hours worked only. During semesters, it is recommended that students not work more than 20 hours per week, and they may not exceed a maximum of 29.5 hours per week (20 hours per week for international students). During breaks, students may work a full 37.5 hours per week.

Section 9: Other Account Expenditures

- 9.1 <u>Travel</u>
- 9.2 How Equipment, Commodities, and Contractual Services Are Defined
- 9.3 Campus Suppliers
- 9.4 Off-Campus Suppliers / Prime Vendors
- 9.5 <u>P-Cards</u> for most goods < \$3,500 and most equipment < \$1,500
- 9.6 <u>Invoice Distributions</u> for most services < \$1,500 and some < \$5,000
- 9.7 Purchase Requisitions for all other goods and services
 - 9.7.1 Sole Source Contracts
 - 9.7.2 Purchases of \$50,000 or More: Bid Process
 - 9.7.3 Purchases of \$50,000 or More: Special Approvals
 - 9.7.4 Planned (Blanket) Purchase Orders
- 9.8 Some Goods and Services Requiring Prior Authorization
- 9.9 HELP! Tips for Expediting Things

This section of the *Sponsored Project Guide* covers common other-than-salary (OTS) expenditures: those for travel, equipment, commodities, and contractual services. For other types of OTS expenditures, check with <u>Grant & Contract Accounting</u>.

The Administrative Information System (AIS) financial system is used for grant accounts. Grants are assigned an AIS budget purpose number. The budget purpose number is what you put on forms like *Purchase Requisitions*. You also need it, along with another number issued by Accounting Services called the fund number, to track your expenditures and check account balances on the <u>AIS web site</u>. Most electronic forms used for financial transactions are fillable PDFs obtainable from SIUC's central <u>eForms repository</u>.

9.1 Travel

Travel expenses to be charged to a grant must be consistent with any restrictions in the award. The following is an overview. For more details, see the <u>"Know Before You Go" Travel</u> <u>Manual</u> or the <u>Procurement Services-Travel website</u> for more information.

Travel Expenses for SIUC Employees (students are not considered employees; see below)			
Expense	How Paid or Reimbursed	Budget Line	
Conference registration fees	Paid by P-card (\$3,500 limit) or by <u>Accounts Payable Invoice Distribution</u> <u>Form</u> . If less than \$50, can be reimbursed by an <u>Procurement Services Travel</u> <u>Expense Voucher</u> .	contractual services	
Commercial airfare or train tickets	Paid by P-card (preferred method) or by <u>Accounts Payable Invoice Distribution</u> <u>Form</u> .	travel	
University planes and charter flights	Paid by internal transfer of funds. To make arrangements, contact Flight Services (453-1144).	contractual services	
Lodging	Paid by P-card or reimbursed by <u>Procurement Services Travel Expense</u> <u>Voucher.</u>	travel	
Meals	Reimbursed by <u>Accounts Payable Travel</u> <u>Expense Voucher</u> (see below for details). Reimbursement is by per-diem (overnight travel or trips of 18+ hours) or by meal allowance (shorter trips).	travel	
Mileage for travel by personal vehicle (e.g., local travel to research sites; for other destinations, must be the most economical means of travel)	Reimbursed by <u>Procurement Services</u> <u>Travel Expense Voucher</u> . Mileage between home and campus is not reimbursable. You must own the vehicle yourself and it must be insured.	travel	
University fleet vehicles and gas	Paid by internal transfer of funds. See below for info on fleet vehicles.	operation of automotive equipment	
Rental vehicles and gas	Paid by P-card or reimbursed by <u>Procurement Services Travel Expense</u> <u>Voucher.</u> See below for info on rental vehicles.	travel	
Taxis, subway fare, parking, etc.	Reimbursed by <u>Procurement Services</u> <u>Travel Expense Voucher.</u>	travel	

Travel Expenses for Students and Non-SIUC Travelers

Travel expenses for students and non-SIUC travelers are reimbursed by an <u>Accounts Payable</u> <u>Invoice Distribution Form</u>. See below for more info.

Paying Travel Expenses in Advance:

Principal investigators on grants can minimize out-of-pocket travel expenses by using a P-card and the <u>Orbitz for Business</u> web site to book and pay for conference registration, airfare, Amtrak tickets, car rentals, and lodging for University employees, students, and non-University employees traveling on grant business. To get authorized to use the Orbitz site, contact <u>Procurement Services</u>. Ask for the government or state rate when making hotel reservations.

Travel Advances for Out-of-Pocket Expenses:

If you or students traveling on grant business need a travel advance to help cover out-of-pocket expenses such as meals and taxi fares, contact the <u>Bursar's Office</u>.

Out-of-Pocket Travel Reimbursement for SIUC Employees:

Some travel expenses that can't be paid in advance (e.g., parking, gas to refuel rental car, shuttles, etc.) can be paid-as-you-go by P-card. However, meals and gas for personal vehicles cannot be. To have these expenses reimbursed after your trip, you must fill out an *Procurement Services Travel Expense Voucher* (see instructions provided), get it signed by the grant fiscal officer (or by your supervisor if you are the fiscal officer), and submit it to Grant & Contract Accounting (mailcode 6812) as soon as possible. To comply with IRS rules, if an expense voucher is not submitted to Procurement Services within 60 days of the completion of travel, the reimbursement is considered taxable income and included on the employee's W-2 as supplemental wages.

Attach receipts for all expenses over \$10, other than meals (which are reimbursed at standardized rates). **State auditors require that receipts be the originals.** Keep photocopies. If you only have a copy, you must also submit a *Expense Certification Form*.

Also attach receipts for all expenses paid by P-card, or copies of the billing for any expenses prepaid by an <u>Accounts Payable Invoice Distribution Form</u>, such as conference registration fees (include a copy of the completed registration materials). You must indicate these expenses on the voucher, but deduct the amount in the "Amount Not Allow ed" section.

SIUC's <u>"Know Before You Go" Travel Manual</u> covers lots of details about allow able travel expenses and vouchers. Still have questions? Contact Procurement Services (453-2253).

Out-of-Pocket Travel Reimbursement for Students and Non-SIUC Travelers:

You can prepay many of the travel expenses for students and non-SIUC travelers (e.g., research participants, consultants, invited speakers) using a P-card. Otherwise, they are reimbursed by the grant for their travel expenses via an <u>Accounts Payable Invoice Distribution</u>

<u>Form</u>. You will need to submit their original receipts (keep photocopies!) along with the form. Send the paperwork to Grant & Contract Accounting (mailcode 6812).

Foreign Travel:

The University prefers to use the <u>foreign travel per-diem allow ances</u> (set by the State Department) for reimbursement, rather than reimbursing for actual lodging and subsistence expenses. How ever, since the State Dept. allow ances are *maximums*, the fact is that you often can book lodging that is much more affordable for your grant, depending on the nation/city and your familiarity with it. Read section 17 of the <u>"Know Before You Go" Travel Manual</u> to learn what's required in the way of receipts. If you can't get a lodging rate within the State Dept. allowances, call <u>Procurement Services</u> for their OK. If you will need to rent a vehicle for grant business in a foreign country, check with <u>Risk Management</u>.

It is important that you notify Risk Management if you are planning travel to any country or jurisdiction which is subject to trade or economic sanctions imposed by U.S. laws or regulations.

Also, contact Jenny Richardson at (618) 453-3713 for a user name and password that will allow access to www.aceExecutiveAssistance.com, a web site with information about your destination, including security information and emergency medical services. **Take this user name and password with you.** In addition, download the attached PDF version of the ACE travelers companion guide for educational institutions, ID card, and passport stickers and **take these documents with you** while traveling in a foreign country on University business.

You may also want to be sure to **register foreign trips** at <u>www.state.gov/travelandbusiness/</u>. This will make your presence known at the U.S. Embassy in case it is necessary for a consular officer to contact you in an emergency.

Questions may be directed to Jenny Richardson at Risk Management.

University Fleet Vehicles:

University cars and other fleet vehicles can be reserved from <u>Travel Service</u>. Each vehicle has a set of major oil-company credit cards that you can use to pay for fuel. Travel Service has information on vehicle rates and fleet use policies. Charges are paid from the Operation of Automotive Equipment line.

Rental Vehicles:

Vehicles for University travel may not be rented within 100 miles of Carbondale. Instead, you must reserve a fleet vehicle from <u>Travel Service</u> (see above).

Otherwise, you may rent a vehicle if you are away from campus and no other suitable means of transportation are available. Your best option may be to reserve and pay for your rental with a P-card via <u>Orbitz for Business</u>, a travel service used by the University. SIUC has a contract with National Rental Car to provide discounted rates.

Rental vehicles and gas may be paid for with a P-card, or you may pay with a personal credit card and claim reimbursement on the <u>Procurement Services Travel Expense Voucher</u>. Receipts for the rental and the gas must be submitted with your voucher. Don't accept insurance on a

rental vehicle in the United States. The University has insurance, so this charge is not reimbursable. See <u>Travel Regulations</u> for more details.

9.2 How Equipment, Commodities, and Contractual Services Are Defined

Before any purchase, make sure (1) that you have sufficient funds in the appropriate budget line, and (2) that the expenses are allowable on your grant or contract.

Equipment is defined as nonconsumable (inventoriable) property—computers, laboratory equipment, etc. To be classified as equipment on **federal** grants and contracts, items must be valued at \$5,000 or more; less expensive items are classified as commodities. The dollar threshold on **nonfederal** grants and contracts is lower and varies. For instance, it is \$500 on many state grants. If the guidelines for a nonfederal grant don't stipulate a dollar limit, the Grant & Contract Accounting section of Accounting Services uses a \$100 threshold when setting up budget lines for the account (same as the threshold on state budget accounts).

Equipment funds are used for new items only. To obtain used equipment, call Surplus Property (453-2732). Equipment is tagged and inventoried by the Fixed Asset Accounting division of Accounting Services.

Commodities are goods of a consumable nature that show a material change or significant depreciation with first usage. Examples of commodities include:

- standard office supplies
- laboratory supplies
- field research supplies
- most books (but not annual directories; see below)
- printing of materials

Note that software and repair parts are classed as contractual services, not commodities.

Contractual Services are any services performed by an individual using his or her talents and abilities, or by a company using the talents and abilities of its employees, for the good of the University. Included in this category are:

- annual directories
- application and entry fees
- classified advertising
- computer software
- conference registration fees
- consultants' fees (for those who are independent contractors; other consultants must be paid from a salary line)
- lab testing
- mailing expenses
- page charges and reprints
- parts, fixtures, and supplies used for maintenance or repair of property
- payments to non-SIUC employees for voluntary participation in research projects
- photocopying
- photographic work

- professional and artistic services; artistic performances
- rental fees
- repair/maintenance of equipment
- research facility services
- speakers' fees
- student/participant stipends
- subaw ards/subcontracts
- subscriptions
- telephone usage
- travel-related expenses for students and for non-SIUC travelers (e.g., research participants, consultants, invited speakers)

Check with Procurement Services (453-5751) if you are uncertain about the classification of a particular expenditure.

9.3 Campus Suppliers

To buy goods or (more usually) services from campus units, you need to submit a service request form, usually supplied by the unit itself or downloadable from its web site. When the work is completed, either the charges are paid automatically by an internal transfer of funds, or the service unit sends an invoice to the grant fiscal officer. You pay the invoice charges with a <u>Transfer Voucher</u>.

<u>Research support facilities</u> offer technical services to researchers across campus, ranging from equipment fabrication to DNA sequencing, large-poster printing to electron microscopy. See the link for web sites and contact information.

Other campus units also supply goods or services needed for grant activities:

- <u>Campus Mail Service</u> (453-5348): first-class mailing (requires a bar-coded postage charge slip; fill out a <u>DPN Form</u>). Also bulk mailings, stamps, business reply envelopes, etc. (use a <u>Postage Service Request</u>)
- Continuing Education (536-7751): conference services
- Information Technology (453-6280): computer support
- <u>University Communications</u> (453-2276): studio portraits; photo coverage of special events; news releases
- <u>Printing/Duplicating Service</u> (453-2268): letterhead and envelopes, business cards, brochures, photocopying, computerized mailing lists: use a <u>Printing/Duplicating/Mail</u> <u>Center Request</u>
- <u>Student Center</u>: catering (453-1130); scheduling facilities (536-6633)
- <u>Telecommunications Services</u> (453-2484): IP addresses; phone and data connections; authorization numbers for grant-related long-distance calls
- <u>Touch of Nature</u> (453-1121): facilities for workshops, seminars, research
- Travel Service (453-3357): University fleet vehicle rental; use a Vehicle Request Form

Short-Term Office Service (S.O.S.): Administered by Plant and Service Operations, this service assists departments or programs that need office employees for short-term employment (generally four weeks or less, but can be up to 900 hours). S.O.S. is an alternative to extra-help civil service appointments when the grant has contractual services

funds but no salary funds. S.O.S. staff are available on an as-needed basis. Rates vary, depending on the skills required. Charges are paid by an automatic transfer of funds; there is a 5% surcharge to cover the expenses of providing the service. For current rates, or to start the hiring process, call Dawn Wilson (453-8170). She will complete a *Short-Term Office Request* and send it to the immediate supervisor and grant fiscal officer for signature. Supervisors may interview S.O.S. candidates if they desire.

9.4 Off-Campus Suppliers / Prime Vendors

Off-campus purchases require use of a *P-card*, <u>*Accounts Payable Invoice Distribution Form*</u>, or <u>*Purchase Requisition*</u>, depending on the type and amount of the expenditure.

SIUC has contracts with prime vendors that provide discounted pricing for—among other things—computers, lab supplies and equipment, office supplies, and shipping/express delivery. Use these vendors whenever possible. Note that bid requirements, which normally kick in at the \$32,600 threshold for equipment and commodities, are **waived** when you use a prime vendor. If the goods you need don't fit any of the categories below, call Procurement Services (453-5751) to see if they are available from a prime vendor.

OfficeMax: Order office supplies online, at a discount, from <u>OfficeMax Solutions</u>. Don't have a <u>P-card</u>? Get one first; you'll need it to pay. Then contact Procurement Services (453-5751) to request a short authorization form that you fill out and fax to OfficeMax. The company will e-mail you a password giving you online access.

Dell Computers:

Dell computers and Apple computers may be purchased with a P-card if the system costs less than \$3,500. SIUC has a prime vendor contract with 710 Bookstore to provide Dell computers. Go to the Dell site from Purchasing's <u>prime vendor page</u> to configure the system you want. Print out an e-quote. If the system costs less than \$3,500, submit the e-quote with a Computer P-card Request to Purchasing, mailcode 6813. (Go to the <u>P-card page</u> and select from the forms menu to find the Computer Request.) If the system costs \$3,500 or more, submit the e-quote with a <u>Purchase Requisition</u> to Grant & Contract Accounting, mailcode 6812. The procedure is the same for Macintosh computers. Go to the <u>Apple web site</u> and choose the education site for the best prices.

Other computer purchases, regardless of cost, require a <u>*Purchase Requisition*</u>. In addition, purchases of computers other than Dells, Maintoshes, and Unix-based computers require a **written justification** to accompany the *Purchase Requisition*.

Fisher Scientific Co.: Fisher furnishes laboratory equipment, casework, supplies, and chemicals. No bidding requirements are involved. See the Fisher information on the Procurement Services contract <u>web page</u>. Order online with a P-card if the transaction is less than \$3,500 (\$1,500 if equipment); otherwise, order by submitting a <u>Purchase Requisition</u> to Grant & Contract Accounting (mailcode 6812). Requisitions of \$50,000 or over require special approvals. Questions? Contact <u>Procurement Services</u>.

UPS: UPS offers discounted pricing and departmental pickup for shipping and express delivery of letters and packages to domestic and international locations. Payment is **only** by P-card. Questions? Contact Procurement Services (453-5751).

9.5 P-Cards - for most commodities < \$3,500 and most equipment < \$1,500

Purchases of most commodities, some equipment, and some services can be made with a procurement card, or P-card—a University credit card obtained from Procurement Services (the issuer is MasterCard). **To obtain a P-card**, contact Procurement Services (453-5751).

All P-card recipients must go through training. If you are using the card for several grant accounts, you must assign purchases to the proper grant account. Purchasing's <u>P-card web</u> page posts information and forms, including the <u>P-Card Policies and Procedures Manual</u>. P-card records must be retained by the cardholder for seven years in a form that is easily accessible for auditing.

P-cards have a **monthly charge limit of \$15,000**. <u>Prime vendors</u> should be used for purchases whenever possible.

Transaction limits are:

- \$3,500 for commodities
- \$3,500 for furniture
- \$3,500 for Dell and Apple computers (other types of computers may not be paid for by P-card)
- \$3,500 for computer software (must not involve a signed license agreement)
- \$3,500 for conference registration fees
- \$1,500 for equipment other than Dell and Apple computers
- \$1,500 for repair parts (repair work requires a <u>Purchase Requisition</u>)

These limits include all shipping and handling charges. Goods and services that cost more or that are on the <u>P-card prohibited list</u> require an <u>Accounts Payable Invoice Distribution Form</u> or a <u>Purchase Requisition</u> instead.

Since SIUC is a state institution, **tax may not be charged on purchases. You'll have to notify vendors of this.** If an online ordering site automatically adds tax, you must contact the vendor via telephone instead to place your order. On occasion you may have to fax a vendor a copy of SIUC's <u>Tax Exemption Letter</u>.

Additional requirements in certain cases:

If you are buying a **Dell or Apple computer**, you must submit a *Computer P-Card Request* to Procurement Services along with the e-quote generated from the Dell or Apple sites. (Go to the <u>P-card page</u> and select from the forms menu to find the Computer Request.) Other types of computers cannot be purchased by P-card; contact Procurement Services (453-5751).

If you are buying **furniture**, you must submit a <u>*Furniture P-Card Request*</u> to Procurement Services before you make your P-card purchase. If the furniture costs more than \$500, you

also must submit a *Furniture Affidavit*. There are certain approved vendors for furniture purchases; contact Procurement Services (453-5751).

If you are buying **equipment**, send an <u>Equipment Transaction Form</u> and a copy of the invoice to Fixed Asset Accounting (MC 6812) so that the equipment will be tagged and added to inventory.

9.6 Invoice Distributions - for most services < \$1,500 and some < \$5,000

Most payments for one-time services costing \$1,500 or less can be made via an <u>Procurement</u> <u>Services Invoice Distribution</u> form ("direct voucher method"). This includes honoraria for speakers and fees for consultants who are independent contractors. (Note: For insurance reasons, paying suppliers to do on-campus equipment repairs, installation, training, etc., always requires a <u>Purchase Requisition</u>.)

For a few types of services that require no signed contract, the *Invoice Distribution* limit goes up to \$5,000. Procurement Services maintains a <u>complete list of such services</u>. They include:

- admission, application, participation, and entry fees
- conference registration fees, including setup/booth rental charges (can pay with P-card if less than \$3,500)
- copyright fees
- educational awards provided through National Science Foundation grants
- entertainment costs (must comply with University policies/regulations relating to entertainment)
- journal subscriptions
- page charges and reprints
- payments to non-SIU employees for voluntary participation in a research project (mark the form "No Services Rendered")
- off-campus repairs/servicing of equipment not requiring a signed agreement
- rental fees for public facilities when a signed agreement is not required
- student fellow ships for education (mark the form "No Services Rendered")
- travel expense reimbursement to students and to non-SIUC travelers (e.g., research participants, consultants, invited speakers)

Send a completed, signed <u>Procurement Services Invoice Distribution</u> to Grant & Contract Accounting (mailcode 6812), along with the supplier's invoice. See <u>Direct Voucher Method</u> <u>for Payment</u> for instructions.

If the form is for **payments to research participants**, add the notation "No Services Rendered" in the "Description/Notes" section.

If payment is required **in advance**, (for things like conference fees and subscriptions) you won't have an invoice number. Add the notation "Pro Forma" in the "Description/Notes" section.

If you are purchasing **services from an individual**, rather than from an incorporated business, you must submit an <u>Independent Contractor Analysis Form</u> and a <u>W-9 Form</u> with the *Procurement Services Invoice Distribution*. These forms must be filled out and signed by the

individual providing the service, and then signed by the grant fiscal officer. If you have questions, call Tracy Bennett at Human Resources (453-6695). If the individual is named in the grant, also submit a copy of the fully executed grant. This will greatly expedite approval.

Services above the \$1,500 or \$5,000 limit require processing of a *Purchase Requisition* (see next section).

9.7 Purchase Requisitions - for all other goods and services

The following purchases require a *Purchase Requisition*:

- equipment or commodities above the <u>P-card transaction limits</u> or on the <u>P-card</u> <u>prohibited list</u>
- services costing more than \$5,000
- services costing between \$1,500 and \$5,000 that do not appear on the <u>Pay Without</u> <u>Requisition</u> list

Individuals do not have the legal authority to enter into contracts with suppliers for SIUC business. You must work through Procurement Services by submitting a <u>Purchase</u> <u>Requisition</u>. The Procurement Services Office web site has a list of <u>types of purchases</u>, with links to the buyer who handles each type. Call or e-mail the buyer if you have questions. Allow 2 weeks of lead time for routine purchases by requisition, 3-4 weeks if <u>bids</u> will be required.

1. Fill out a <u>*Purchase Requisition*</u> with the grant account number and title, department, description of the items or service to be purchased, quantity, cost or price quote, recommended supplier, completion date (if services), and fiscal officer's signature. It's a good idea to attach a copy of the literature that describes the product or service.

Bids (see below) are encouraged, though not required, for items costing \$10,000 to \$49,999. Buyers in Procurement Services may bid items at their discretion. A <u>Financial</u> <u>Disclosure form</u> is required from the vendor on any order for \$10,000 or more.

- **Purchasing from individuals:** If you're obtaining consulting or other services from an individual, rather than an incorporated business, you must submit an *Independent Contractor Analysis Form* and *W-9 Form* with the *Purchase Requisition*. These forms must be filled out and signed by the individual providing the service, and then signed by the grant fiscal officer. If you have questions, call Tracy Bennett at Human Resources (453-6695). If the individual is named in the grant, also submit a copy of the fully executed grant. This will greatly expedite approval.
- Bidding/sole source contracts: See below.
- 2. Send the requisition and any accompanying paperwork to Grant & Contract Accounting (mailcode 6812), which will check the account for available funds and forward the paperwork to Purchasing.
- 3. Procurement Services will verify the price and solicit bids if necessary. You must justify your choice if you don't select the lowest bidder.
- 4. Procurement Services will prepare a purchase order and fax it to the vendor/supplier.

- Goods normally are shipped to Central Receiving, which in turn delivers to the department. If you receive the shipment directly from the vendor, notify Expediting (453-6722) of receipt.
- 6. Forward the vendor's invoice to Procurement Services.

9.7.1 Sole Source Contracts

Procurement Services may change suppliers on requisitions if they believe they can obtain something less expensively through another source. If the terms of your grant or the technical specifications of your project require a specific vendor for a purchase, alert Procurement Services that you need a sole source contract because suppliers cannot be substituted.

If the cost will be above the bid threshold of \$49,999 (\$20,000 for professional/artistic services), you also must submit a <u>Sole Source Justification Form</u> with the requisition. **Allow several weeks** of lead time in this case: all sole source contracts above the bid threshold must be published in advance in the <u>Illinois Higher Education Procurement Bulletin</u>.

9.7.2 Purchases of \$50,000 or More: Bid Process

Requests to purchase an item or service costing **\$50,000 or more** (\$20,000 or more in the case of professional/artistic services) must be competitively bid by advertising in the <u>Illinois</u> <u>Higher Education Procurement Bulletin</u> in order to select a supplier. (Exceptions: You're using a <u>prime vendor</u>, or you receive approval from Procurement Services for a <u>sole source</u> <u>contract</u>.) The Procurement Services Department does the advertising based on your specifications. Allow 3-4 weeks of lead time in submitting your *Purchase Requisition*. More information is available from Purchasing.

9.7.3 Purchases of \$50,000 or More: Special Approvals

Purchases of **\$50,000 or more** require approval from the SIU President; allow extra lead time. Purchases of **\$100,000 or more** also require approval of the SIU Board of Trustees; allow **3 months** of lead time.

For all purchases of \$50,000 or more, the requisition must be accompanied by either a <u>Sole</u> <u>Source Justification Form</u> (if suppliers cannot be substituted) **OR** a brief letter of justification stating what you're buying, what it will be used for, budget purpose number and title, and funding agency. See <u>Board Letter Requirements</u> for more information.

9.7.4 Planned (Blanket) Purchase Orders

If you need to buy various items or services costing \$1,500 or more from one vendor over an extended period, obtaining a planned purchase order can cut down on your paperwork

because you only need to submit one requisition. Planned purchase orders also can be issued for repeated purchases of items under \$1,500 that are on the <u>P-card prohibited list</u>.

The procedure is the same as for normal purchase requisitions, except that you must specify the types of items or services to be purchased, estimated total expenditure, and time frame for purchases. When Procurement Services establishes the planned purchase order, it will send you a copy showing the total dollar amount for orders, time period, and purchase order number. You contact the vendor directly for orders and send the invoices to Procurement Services for payment.

9.8 Some Goods and Services Requiring Prior Authorization

Note: This is not an all-inclusive listing. For more information, see <u>categories</u> on the Procurement Service's <u>How-To Pages</u>.

Classified advertising: Placing a classified ad for any University position requires preparation of a *Purchase Requisition* with attached ad copy. Send materials to the University Affirmative Action/Equal Opportunity Office (453-1186, mailcode 4306). The approval process has recently been streamlined; ads no longer need to go to University Communications for signature.

Compressed gases: The <u>Center for Environmental Health and Safety</u> (453-7180) handles purchasing and delivery of compressed gases. Check with the center or with your department for details.

External consultants: The services of external consultants who are independent contractors (e.g., who operate or are employed by a consulting firm) are retained via a *Purchase Requisition*. The requisition must detail the consulting services to be rendered on specified dates and the amount of the compensation. External consultants who don't meet the tax-law criteria for an independent contractor must be hired as restricted-term or extra-help employees and paid from a salary line; see External Consultants in section 8 of this guide. To make this determination, Procurement Services requires that you submit an *Independent Contractor Analysis Form* and a *W-9 Form* with the requisition. Questions? Contact Tracy Bennett in Human Resources (453-6695). Allow at least 2 weeks of lead time for Procurement Services to process the paperwork. Travel expenses of external consultants can be reimbursed to them using an *Accounts Payable Invoice Distribution Form*.

Laboratory animals: All requisitions for laboratory animals are generated by the <u>Laboratory</u> <u>Animal Program</u> (536-2346). Call them for an *Animal Request Form*, which you'll need to fill out and submit to them. Research using animals requires prior <u>clearance</u>; submit an *Animal Use Protocol* form to the Institutional Animal Use and Care Committee (453-4533) for review. Various protocols are available on the <u>IACUC web site</u>. Per-diem charges for animal care are billed as a contractual service.

Printing done off-campus; engraved/imprinted items: <u>*Purchase Requisitions*</u> to purchase off-campus printing must be approved by Printing Service (453-2268) and University Communications (453-2276) before submission to Grant & Contract Accounting (mailcode 6812). Approval by University Communications is also required for engraved/imprinted items such as plaques, T-shirts, mugs, etc.

Radioactive materials: Requisitions for radioactive materials require prior authorization by the <u>Center for Environmental Health and Safety</u> (453-7180). CEHS has a <u>sample requisition</u> online.

9.9 HELP! Tips for Expediting Things

Some red tape is unavoidable in spending grant money because SIUC must follow Board of Trustees and State of Illinois policies and regulations. For example, bid specifications are required to be published for a certain amount of time; there's no getting around it. Grant accounts, like state accounts, are subject to these requirements because they are institutional funds. **However, a lot depends on you. There are steps you can take to speed things up**—especially if getting your project underway depends on a major purchase, such as an expensive piece of equipment.

- Contact ORDA as soon as you know the grant award is on its way. If the project startup will require a large purchase that will have to be bid out or purchased via a sole source contract, inform the staff so that the award can be processed as soon as possible. You also may want to see if your dean will approve an advance account.
- Plan ahead! Submit paperwork in a timely way.
- Remember to send requisitions and invoice distribution forms to Grant & Contract Accounting (mailcode 6812), not Purchasing. Otherwise, Procurement Services has to kick them back to Grant & Contract Accounting for review, which means a delay.
- Do it right the first time: make sure your Purchase Requisitions have all the required information. Contact Grant & Contract Accounting (536-2351) or Procurement Services (453-5751) if you have any questions about what is required.
- For a sole source purchase, submit your <u>Sole Source Justification Form</u> with the *Purchase Requisition.*
- For a purchase of \$50,000 or more, submit your letter of justification with the *Purchase Requisition*.
- If you're under a time constraint, alert Grant & Contract Accounting and Purchasing. You may want to walk the paperwork through to Grant & Contract Accounting for their signoff and then directly upstairs to Procurement Services (both are in Miles Hall).
- Respond to any Procurement Services Office requests ASAP.

Section 10: Research Policies and Compliances

Research integrity involves adherence to ethical standards in practices ranging from treatment of research subjects and supervision of employees to management of data and assignment of authorship. Many of these issues are covered by official policies and compliances, but many are not. All researchers have the obligation to carry out their University-sanctioned projects responsibly and to train their staff and students likewise. See OSPA's page on responsible conduct of research for guidance.

Most formal policies affecting research and sponsored projects are first considered by the Research Committee of the <u>Graduate Council</u> and ultimately approved by the SIUC chancellor or president. Other research-related policies, principles, and guidelines listed here derive from broader University policy, from commonly accepted practices in sponsored project administration, and from government requirements. **Note:** The position referred to in the text

of formal policies as the Associate Vice Chancellor for Academic Affairs and Research and Dean of the Graduate School is now the Vice Chancellor for Research and Graduate Dean.

Compliances

- 10.1 Animal Care Compliance
 - 10.2 Hazardous Materials Compliances
 - 10.2.1 Hazardous Biological Materials and Recombinant DNA
 - 10.2.2 Radiological Materials
 - 10.2.3 Hazardous Chemicals
 - 10.3 Human Subjects Compliance
- 10.4 <u>Significant Financial Interests Disclosure</u> (also see Conflict of Interest Policy, below)
- 10.5 Stem Cell Research Compliance
- 10.6 Export Controls

Other University Policies Affecting Research

- 10.7 <u>Academic Freedom</u>
- 10.8 <u>Clean Air</u>
- 10.9 <u>Conflict of Interest</u>
- 10.10 Drug-Free Workplace
- 10.11 Electronic Information Privacy
- 10.12 Institutional Submission of Grant/Contract Applications and Acceptance of Awards
- 10.13 Intellectual Property (Patents and Copyrights)
- 10.14 Research Faculty
- 10.15 <u>Research Misconduct</u>
 - 10.15.1 <u>Responsible Conduct of Research</u>
 - 10.15.2 Responsible Conduct of Research Training
- 10.16 Researcher Positions: Guidelines for Classification
- 10.17 <u>Software Piracy</u>
- 10.18 Use of University Property

Other Sponsored Project Policies and Guidelines

- 10.19 Best-Effort Performance
- 10.20 Classified Research
- 10.21 Cost-Sharing Guidelines
- 10.22 Facilities & Administrative (Indirect) Costs
- 10.23 Limited Proposal Submissions
- 10.24 Principal Investigator Eligibility and Responsibilities
- 10.25 Proposal Submission Policy and Procedures
- 10.26 <u>Publication Rights and Proprietary Information</u>
- 10.27 <u>Subaward (Subrecipient) Monitoring Guidelines</u>
- 10.28 <u>Supervision and Reporting of Research</u>
- 10.29 Use of University Name

Compliances

10.1 Animal Care Compliance

The SIUC Institutional Animal Care and Use Committee was formed to establish and enforce ethical, humane guidelines for the use of live animals in research and teaching at the University. The committee reviews all protocols involving the use of vertebrate animals to assure compliance with humane standards and federal regulations.

Researchers whose project will involve vertebrate animals (whether laboratory animals, livestock, or wildlife) must submit a completed Animal Use Protocol form for the committee's review. No research involving vertebrate animals, whether grant-funded or not, may be conducted prior to receiving committee approval. Approval of the protocol is required before the animals can be used for training, research, or testing purposes. For more information and protocol forms, see the Institutional Animal Care and Use Committee web site or contact the secretary of the committee at OSPA, 453-4533 or iacuc@siu.edu.

Some agencies, such as the National Institutes of Health, will not award a grant if the researcher lacks the necessary institutional approval for the project; others will not review proposals lacking approval. Thus, it is strongly recommended that you contact the committee as early as possible in the project planning stage.

In additional, SIUC has maintained accreditation with the Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC). The NIH accepts AAALAC as the best means to conformity with NIH requirements. See <u>SIUC Investigator and Staff Animal Care of Use Handbook</u>.

10.2 Hazardous Materials Compliances

Faculty and staff conducting projects that involve hazardous biological materials (including recombinant DNA), radiological materials, or hazardous chemicals must comply with all relevant government regulations. **No research involving such substances, whether grant-funded or not, may be conducted prior to receiving committee approval.** Some agencies, such as the National Institutes of Health, will not award a grant if the researcher lacks the necessary institutional approval for the project. In some cases, agencies will not review a proposal that lacks proper clearance; thus, researchers should contact the appropriate committee as early during the proposal process as possible. SIUC's <u>Center for Environmental Health and Safety</u> (453-7180) oversees the activities described below and monitors compliance.

10.2.1 Hazardous Biological Materials and Recombinant DNA

SIUC's Institutional Biosafety Committee and Biological Safety Officer are responsible for ensuring that faculty and staff who conduct research with hazardous biological materials comply with the most recently published federal and state standards for such research.

Biological materials covered by the standards include living organisms, products produced by such organisms, organic chemicals produced to mimic activity/actions of such products, and recombinant DNA molecules. Biological materials are considered hazardous if they present a direct or indirect risk to the well-being of humans, animals, or plants.

Any SIUC researcher who plans to conduct research involving potentially hazardous biological materials or recombinant DNA must submit to the Institutional Biosafety Committee a memorandum of understanding and agreement (MUA) describing the work and the safeguards to be used. The proposed project must be approved by the committee before activities can begin. For more information and for copies of the appropriate MUA form, contact the Institutional Biosafety Officer at 453-7180 or see SIUC's <u>Center for Environmental Health and Safety.</u>

10.2.2 Radiological Materials

SIUC holds licenses issued by the Illinois Department of Nuclear Safety that contain specifications governing research projects that involve radiological materials. All research conducted at the University must be done within the framework established by the licenses and various other state and federal regulations. SIUC's Radiological Control Committee formulates policies for uniform practice throughout the University wherever radioactive materials or radiation-producing devices are involved.

Prior approval of the committee must be obtained by any University personnel who plan to use radioactive materials in their work. The appropriate application forms and training modules are available from the Radiation Safety Office, 536-2015, or see SIUC's <u>Center for Environmental Health and Safety</u>.

10.2.3 Hazardous Chemicals

The Center for Environmental Health and Safety formulates guidelines for managing and disposing of hazardous chemicals and complying with government regulations concerning such materials. Researchers whose projects will involve the generation of hazardous chemical waste should consult the <u>Chemical Waste Management Guide</u> for information about the procedures to be followed and training requirements, or they may contact the center at 453-7180.

There are no disposal options for "mixed waste"—i.e., waste that is both chemically hazardous and radioactive. Consequently, research involving the use or generation of such waste will not be approved.

10.3 Human Subjects Compliance

The U.S. Department of Health and Human Services requires that all research projects involving human subjects be screened to confirm that the subjects' rights, privacy, welfare, and civil liberties are protected. The SIUC Human Subjects Committee is responsible for

reviewing all proposed human-subjects research projects to be conducted by individuals affiliated with SIUC, including students. This review protects not only the human subjects involved in a research project, but also the researcher and, by extension, the University. **No research involving human subjects, whether grant-funded or not, may be conducted prior to receiving committee approval.** For more information and application forms, or to submit a planned project for review, contact the secretary of the committee at 453-4533 or siuhsc@siu.edu. See the Human Subjects Guide and Human Subject Procedures.

Some agencies, such as the National Institutes of Health, will not award a grant if the researcher lacks the necessary institutional approval for the project; others will not review proposals lacking approval. Thus, it is strongly recommended that you contact the committee as early as possible in the project planning stage.

10.4 Significant Financial Interests Disclosure

Investigators and project employees with a significant financial interest in any business entity (a) sponsoring their research, (b) whose business is substantially related to the subject matter of the proposal, and/or (c) that could reasonably be expected to bias the activities described in the grant proposal must fill out a <u>Disclosure of Proposed Non-University Activities and</u> <u>Financial Interests</u> form. This form must be returned to OSPA before the grant proposal is submitted. "Significant financial interest" is defined as \$10,000 or more in annual income, or ownership/stock interests of 5% or more, including the financial interests of any immediate family member.

Where a significant financial interest is disclosed, any grant award resulting from the proposal cannot be accepted by SIUC until the institution has determined that no significant conflict exists or has worked out safeguards to avert a conflict of interest. Disclosures must be updated by the researchers and other project employees during the period of the grant award, either on an annual basis or as new reportable significant financial interests are acquired.

This policy applies to grant proposals to **all sponsors**, public and private. It also satisfies the Investigator Significant Financial Interests Disclosure Policy of the National Science Foundation and the Public Health Service. See the University's <u>Conflict of Interest Policy</u>.

10.5 Stem Cell Research Compliance

The SIUC <u>Stem Cell Research Oversight (SCRO) Committee</u> reviews proposals for any research to be undertaken at SIUC involving the **derivation or use of human stem cells**—whether adult, embryonic (to include the derivation of hESCs from human embryos/blastocysts, how ever they were created), umbilical, placental, or fetal. This requirement applies whether or not the research is grant-funded. All projects that will involve human stem cells, whether to be conducted at Carbondale or at Springfield, must be reviewed by the <u>Springfield Committee for Research Involving Human Subjects</u>. The committee must approve the project before the research can begin. For more information, see the <u>Stem Cell Research Compliance web page</u> or contact escro@siu.edu.

Review and approval by the SCRO Committee is in addition to and is not a replacement for approval by or adherence to other University policies, federal regulations, and state and local laws governing research. Other policies that need to be considered include, but are not limited to, reviews by the Institutional Animal Care and Use Committee, the Human Subjects Committee, the Institutional Biosafety Committee, federal <u>HIPAA privacy standards</u>, etc. See section IV-A of the <u>SIUC Policy and Procedures Governing Stem Cell Research</u> for the sequence of review.

10.6 Export Controls

The Office of Sponsored Projects Administration is responsible for coordinating SIUC's expert control compliance. It is the responsibility of the Principal Investigator/Project Director (PI/PD) on any project or contract to be aware of this policy and to notify OSPA of potential export control issues. When a faculty/staff applies for external funds they are required to complete the "decision tree" as part of the internal routing form or checklist prior to submission of the proposal.

Export control regulations impose controls on the distribution or "export" of certain information, data materials, items, and services from the U.S. to foreign nationals and countries as a means of protecting U.S. national security or national economic interest. With respect to the former, exports with capacity for military applications are especially sensitive. Such distribution requires that SIUC obtain federal permission and/or a license.

It is the responsibility of the Principal Investigator/Project Director (PI/PD) on any project or contract to be aware of this policy and to notify OSPA of potential export control issues on the proposal checklist. See the SIUC Export Control Management Policy and Procedures under the "Compliance" section on the OSPA main web page.

Other University Policies Affecting Research

10.7 Academic Freedom

SIUC supports the principle of academic freedom, including freedom of research and unrestricted dissemination of information. See the University policy statements <u>Academic</u> <u>Freedom—Rights and Responsibilities</u> and <u>Code of Ethics</u>. Faculty and staff are entitled to full freedom in research within ethical and legal constraints, including retention of research data and publication of research results, unless they negotiate and agree to limited restrictions as part of a sponsored project award. See <u>Publication Rights</u> below.

10.8 Clean Air

SIUC's <u>Clean Air policy</u> prohibits smoking in indoor areas. The section of the policy specifically relevant to research (I-1.) provides that where use of tobacco products is required in connection with approved research activities, researchers may request authorization from the Vice Chancellor for Research and Graduate Dean.

10.9 Conflict of Interest

Overview below | Full text of policy here | Also see Significant Financial Interests Disclosure, above

Research and sponsored project activities should not result in any actual or apparent conflict of interest or conflict of commitment. Such conflict could lead to various problems, including undue influence of a private business in the University's operation or procurement practices, interference with a faculty or staff member's other employment duties at SIU, interference with a student's education, and improper use of University property. Although the University encourages interested faculty and staff to develop contacts in the private sector and to conduct industry-sponsored research activities, faculty and staff should be especially alert to potential conflicts in such situations.

SIU employees must read and comply with the requirements and principles set forth in the University's Policy on Conflict of Interest: Non-University Activities and Financial Interests. As the policy notes, Illinois law requires full-time faculty members to obtain official written approval from the institution (appropriate vice chancellor) before engaging in outside research or consulting for remuneration, and to provide an annual statement of the amount of actual time spent on such activities.

Full-time employees must complete a <u>Disclosure of Proposed Non-University Activities and</u> <u>Financial Interests</u> form annually if income greater than \$1,000 is expected to be received from non-University activities that would reasonably appear to directly affect or be affected by their University responsibilities. The form must be submitted and approved before the employee initiates such activities.

Activities and financial interests for which reporting is **not** necessary include:

- time spent in preparing books, articles, lectures, works of art, etc., expected of faculty and staff in the normal course of University duties;
- royalties from writings published before the policy's effective date of 4/21/95;
- prizes;
- Uncompensated and volunteer activities.

Activities and financial interests that are necessary to report include:

- accreditation and program reviews for other institutions;
- sale of art work or scholarly work, including royalties from writings published on or after the policy's effective date of 4/21/95;
- honoraria;
- guest lectures, workshops, and artistic performances (paid or unpaid);
- consulting activities and outside research;
- salary from any non-University entity;
- stock, stock options, ownership interests;
- Intellectual property rights.

Employees engaged in approved non-University activities must complete and submit an <u>Annual Report of Approved Non-University Activities and Financial Interests</u> to the chair or director of their unit at the end (June 30) of the fiscal year in which the activity occurred.

All researchers should read the <u>full text</u> of the Conflict of Interest Policy.

10.10 Drug-Free Workplace

Both the federal Drug-Free Workplace Act of 1988 and the Illinois Drug-Free Workplace Act of 1992 require contractors and grantees, as a precondition for receiving funds, to certify that they will provide a drug-free workplace. The University's <u>Drug-Free Workplace Guidelines</u> provide, among other things, that each employee to be engaged in the performance of a federal grant or contract shall be given a copy of the following statement:

"All employees are hereby notified that the unlawful manufacture, distribution, dispensation, possession, or use of controlled substances is prohibited on property owned or controlled by the Board of Trustees or in any site where duties of University employment are being performed. Violations of this prohibition will subject employees to disciplinary action in accordance with the applicable personnel policy, law, or regulations having the force of law. As a condition of employment for an employee directly engaging in the performance of work pursuant to a grant or contract covered by the said Act, the employee will abide by the above terms and shall notify the University of any criminal drug statute conviction for a violation thereof not later than 5 days after such conviction."

The guidelines further state that the University will notify the relevant granting or contracting agency within 10 days of receiving notice of a criminal drug statute conviction from a grant/contract employee.

Employees should read the <u>full text</u> of the guidelines, one of several University statements concerning drug and alcohol use by students and employees and concerning alcohol regulation on the SIUC campus.

10.11 Electronic Information Privacy

The University's <u>Electronic Information Privacy Policy</u> has various implications for sponsored projects, including such issues as confidentiality of data, responsibility for security of stored information, and inappropriate usage of computing resources. All researchers should read the full text of this policy and be familiar with its provisions.

10.12 Institutional Submission of Grant/Contract Applications and Acceptance of Awards

As per Chancellor Cheng's January 27, 2011 Memo to all Faculty and Staff:

This memorandum is a reminder of the requirement of Southern Illinois University Carbondale (SIUC) that all applications for externally funded grants and contracts be

submitted through the Office of Research Development and Administration (OSPA). This policy is effective for all employees who receive any salary monies through SIUC, or who use any University resources or facilities in the course of their professional activities.

This requirement exists to ensure that all externally funded research, training, and other projects conducted by SIUC employees or with the use of University resources are reviewed and approved for compliance with pertinent University, state, and federal guidelines, policies, and regulations.

These include, but are not limited to:

- 1. Use of University facilities;
- 2. Conformance with personnel policies, including compensation plans and insurance;
- 3. Policies relating to responsible conduct of research & ethics, including research integrity, misconduct, conflict of interest, & intellectual property;
- 4. Protection of human and vertebrate animal subjects;
- 5. Policies relating to use of stem cells, radiological materials, hazardous chemicals, and other issues relating to a safe working environment; and
- 6. Fiscal accountability, including timely recovery of direct and indirect costs.

In addition, OSPA is the responsible SIUC unit for contract and budget negotiations for all sponsored project activity. OSPA staff will work closely with the sponsor to negotiate the best position for the University in accordance with relevant University, state, and federal guidelines, policies, and regulations.

Awards must be made to the Board of Trustees of Southern Illinois University and agreements can only be signed by an Authorized Institutional Representative designated by the Board.

Legal responsibility and accountability for the conduct of externally funded projects and for compliance with all relevant policies reside with OSPA as the University's agent in these matters. Questions about this policy should be directed to: OSPA, <u>ospa@siu.edu</u>, 453-4540 or to Dr. John A. Koropchak, Vice Chancellor for Research and Graduate Dean.

10.13 Intellectual Property (Patents and Copyrights)

Overview below | Full text of policy here

SIUC's <u>Intellectual Property Policy</u> states that **patentable inventions**, **products**, **processes**, **or discoveries developed with University support belong jointly to the University and the creator**. Their use shall be controlled by the University "in ways that will produce the greatest benefit to the University, the creator, and the public."

The policy also states that **copyrightable works developed with** *significant* **University support likewise belong jointly to the University and the creator.** (See the policy for the definition of "significant University support.") The University places no other claim on traditional academic copyrightable works, with the exception of material made for hire.

Inventions, products, processes, discoveries, and copyrightable works covered by the University's policy must be reported by the creator in writing to the University Intellectual

Property Committee through OSPA's Senior Technology Transfer Specialist, Jeff Myers (jmyers@siu.edu, 453-4556). <u>Disclosure forms</u> (PDF) are available online. The next higher University authority (usually the department chair or unit director) must be informed in writing by the creator at the time the disclosure is submitted.

Within 45 days of the disclosure, the creator is notified of the date on which the committee will review the disclosure. The committee's recommendation as to the disposition of the intellectual property is forwarded to the Vice Chancellor for Research, who makes the decision whether to retain the intellectual property or release all rights to the creator. The decision must be made within 135 days of disclosure unless the creator agrees to an extension.

Faculty should be aware that publicly revealing or disclosing a patentable invention prior to filing a patent application precludes the availability of patent protection in foreign countries, creates a time limit for U.S. filing, and may cause problems related to development and licensing. Faculty and staff are required to cooperate in delaying publication or other public disclosure of intellectual property until the University's review/disposition process is completed. In some cases, longer delays may be needed.

Note that **proper laboratory recordkeeping is crucial** to legally defensible patent claims and protection in the case of a dispute over an invention. See <u>Managing Your Intellectual Property</u> on the <u>Technology Transfer web site</u> for links to some good resources in this area.

The Intellectual Property Policy establishes a sliding scale for splitting net income between the creator and the University. For example, the first \$50,000 of net income is split 50:50 between these two parties. As income increases, the portion allotted to the creator gradually drops to 35%, with additional shares going to the creator's department and college. (Before profits are distributed, the University deducts expenses, such as those incurred in patenting and licensing the product.)

Licensing and royalty income allows SIUC to reinvest in its technology transfer activities and to support research endeavors at the University. In addition to licensing technology to existing companies, OSPA's technology transfer office, along with the <u>Office of Economic and</u> <u>Regional Development</u> and the <u>Southern Illinois Research Park</u>, can assist researchers in starting their own businesses to commercialize their patentable inventions.

Special considerations for grants and contracts:

Funding agencies may require prior approval of the terms and conditions of agreements concerning patentable discoveries and copyrightable materials resulting from the research they have sponsored. Research grants and contracts between the University and the sponsor should set forth each party's obligations and rights and the procedures to be followed if patentable discoveries or copyrightable materials result from the research. Any points not negotiated in the award agreement with the sponsor are subject to University policy. The University and the agency sponsoring a research project also can negotiate licensing options as part of a grant or contract.

For more information, see the <u>full text</u> of the Intellectual Property Policy and the <u>Technology</u> <u>Transfer web site</u>.

10.14 Research Faculty

Overview below | Full text of policy here

Research faculty positions are non-tenured/non-tenure-track term appointments devoted full time to research. Salaries are ordinarily funded from external research grants generated by the individuals themselves. Research may be independent or in collaboration with one or more other faculty members on campus. These collaborators may support the candidate until external funding is secured, or during short gaps when funding is not available. Since the individual is expected to secure external research funding, appointment is on a temporary basis. Renew al will be denied if, in any consecutive 24-month period, the individual does not have one or more major external grants on which he/she serves as principal investigator or co-principal investigator with direct costs in sufficient amount to provide for his/her salary as PI or co-PI.

Each department or academic unit establishes guidelines concerning qualifications for appointment, criteria for promotion, salary increases, access to departmental space and support funds, recommendations for service on or chairing of graduate student committees, and departmental voting privileges for research faculty. These guidelines must be approved by the appropriate deans and vice chancellor. Graduate faculty status follows established procedures.

See the <u>full policy</u> for more details. Information on the hiring process for faculty is available in section 8 of this guide.

10.15 Research Misconduct

Overview below | Full text of policy here

10.15.1 Responsible Conduct of Research

SIUC expects all researchers to adhere to the highest ethical standards in their work. See OSPA's Responsible Conduct of Research page for guidance.

The University's <u>Policy and Procedures on Research Misconduct</u> and the standing University Committee on Research Misconduct provide the mechanism by which concerns about the integrity or accuracy of a research project can be reviewed and resolved. The policy is designed (1) to allow for the expeditious handling of cases of alleged misconduct, (2) to safeguard the rights of all parties involved in such cases, and (3) to demonstrate the University's commitment to intellectual honesty in conducting and reporting research. It applies to everyone involved in funded or unfunded research activities at SIUC, including students.

The policy defines misconduct as an act of deception, distinct from error. Researchers have the responsibility both to report apparent occurrences of misconduct and to take steps to correct the scientific record when they discover error. Any concerns about a research project or allegations of misconduct may be brought to the attention of the chair of the University

Committee on Research Misconduct, the Vice Chancellor for Research and Graduate Dean, or the OSPA director.

For details, see the <u>full text</u> of the policy. Also see the University policy statement <u>Code of</u> <u>Ethics</u>.

10.15.2 Responsible Conduct of Research Training

The 2007 America COMPETES Act directed the National Science Foundation to require that all funded students and post docs undergo training in the responsible conduct of research or RCR. This training includes all undergraduate, graduate, and post doctoral scholars who will be supported by an NSF grant to conduct the proposed research. This requirement also applies to certain NIH training grants.

In order to meet the above training requirement SIUC has adopted the following steps:

- 1. SIUC has subscribed to the Collaborative Institutional Training Initiative (CITI) RCR training program. This training must be completed within 2 months of the student's appointment and can be accessed at <u>www.citiprogram.org</u>.
- 2. Graduate Assistant Workshop Training is offered by the Graduate School each fall semester. Graduate students supported by a NSF grant shall attend one of the three workshops offered on RCR.
- 3. Individual Training by the Principal Investigator must provide continuing education on RCR topics to their NSF supported students.

10.16 Researcher Positions: Guidelines for Classification

There are six classifications of A/P research personnel:

- Researcher I
- Researcher II
- Researcher III
- Assistant Scientist
- Associate Scientist
- Senior Scientist

<u>University policy</u> governs the process for requesting new researcher/scientist positions and reviewing or upgrading existing positions.

<u>Guidelines for the Classification of Research Positions</u>, a document posted on the web site of the University Affirmative Action Office, contains these guidelines and also describes general responsibilities and minimum qualifications for each classification. A <u>Researcher Classification</u> <u>Worksheet</u> must be submitted with any request for a new position or reclassification of a current position. Questions about research classifications and salary ranges should be directed to the Office of the Associate Provost for Academic Administration (536-5535).

Minimum salary rates for these classifications are posted online by Human Resources.

Information on the hiring process for A/P staff is available in section 8 of this guide.

10.17 Software Piracy

The University's <u>Software Piracy Policy</u> has implications for sponsored projects and research, though its purview is far broader. The policy states that unauthorized copying of computer software will not be tolerated and that University employees and students making, acquiring, or using unauthorized copies of computer software may be subject to University disciplinary sanctions as well as to legal action by the copyright owner. See the <u>full text</u> of the policy for more information.

10.18 Use of University Property

Overview below | Full text of policy here

The use of public property for nonpublic purposes is prohibited by the Illinois Constitution. SIU Board of Trustees policy stipulates that use of University property for the benefit of a third party pursuant to a contractual agreement must advance the public purposes of the University. **Consequently, the terms of sponsored project agreements, particularly University/industry research agreements, must be approved by the institution.** Likewise, University employees may not use University facilities or property for non-University business without prior approval. See SIUC's <u>conflict of interest policy</u>.

In this connection as well, any services provided by SIUC's centralized <u>research support</u> <u>facilities</u> for the private sector are charged at a campus (subsidized) rate only if the work is part of a grant- or contract-funded research project. Otherwise, the work is charged at a higher commercial rate, which is set to recover the full costs of performing the work, including overhead.

Other Sponsored Project Policies and Guidelines

10.19 Best-Effort Performance

Sponsored projects at the University are conducted on a best-effort basis. Principal investigators are expected to organize projects according to the time frames agreed upon as part of the grant or contract and to do high-quality work. The University does not accept grant/contract awards that stipulate the achievement of specific research results. Accordingly, it will not accept award provisions that provide for withholding of payment or impose other penalties if the sponsor is not satisfied with project results. Aside from losses arising as a direct result of negligence, the University cannot be held liable to the sponsor for loss or damages suffered by the sponsor either during and as a consequence of the performance of the research, or as a consequence of any actions of the sponsor based upon the results of the research.

10.20 Classified Research

The University does not accept classified research grants, contracts, or agreements. It will not enter into or renew any grant, contract, or agreement that would prohibit it from disclosing the existence of the award document, the identity of any sponsor of the proposed research, or the nature and potential contribution of the proposed research.

10.21 Cost-Sharing Guidelines

General Policy:

Excessive cost sharing—in terms of percentage of investigator effort and total SIUC contributed dollars—is discouraged.

Definition:

Cost sharing refers to the resources contributed or allocated by SIUC to an externally (usually federally) sponsored project, over and above the support provided by that sponsor. SIUC shares the cost of these projects in order to support and enhance its institutional research mission.

Types of cost sharing:

- **Mandatory:** Mandatory cost sharing refers to that portion of the University contribution to a sponsored project that is required by the sponsoring agency as a condition of obtaining the award.
- Voluntary: Voluntary cost sharing refers to that portion of the University contribution to a sponsored project which is not required, and which the University contributes at its own initiative. If the proposed cost-sharing amount (such as principal investigator time) is included in the proposal text or award budget, it then becomes a binding commitment and must be documented and reported as if it were mandatory cost sharing.

Costs may be shared via:

• **Matching funds (cash)** - funds contributed from unrestricted institutional sources; for example, SIUC funds to purchase equipment. (Note: This must be cited somewhere in the proposal.) Equipment must be purchased during the time of the award, not in advance, unless the agency allows pre-award costs.

In-kind contributions - for example, faculty time/salary and graduate assistantships, plus associated benefits, including tuition waivers. Faculty time commitments are given as a percentage of faculty effort during the term of the award, and that percentage must be reported each semester on University Effort Reports.

• **Third-party contributions** - either cash or in-kind; may be donations, volunteer labor, or through subgrants, subcontracts, or similar collaborative agreements.

According to <u>OMB Circular A-110</u>, Sec. 23, mandatory cost sharing and in-kind contributions on federal grants must be

- verifiable from the University's financial records; related to program objectives: necessary and reasonable for proper and efficient accomplishment of the project, and incurred during the award term; allow able under the applicable cost principles (<u>OMB</u> <u>Circular A-21</u>);shown in the approved budget; not paid from or charged to another federally assisted project or program (unless specifically allowed); and
- not includable within the University's indirect cost rates.

The most appropriate University contribution to federal research projects is University-funded salaries of faculty and other employees directly engaged in the project, plus applicable benefits and indirect costs. University-furnished space and **existing** equipment on campus are **not** allow able cost-share contributions, nor are departmental administration expenses (secretarial service, office supplies). Existing equipment may be described in a proposal as "available for use by project researchers at no direct cost to the project."

IMPORTANT:

- The tracking, reporting, and certifying of cost sharing are subject to audit, particularly as they show up in faculty/staff effort reporting. In the case of **volunteer labor**, it is important to document the time spent and account for it at a reasonable rate consistent with rates paid for similar work at SIUC. In the case of **donated property**, the value shall be determined in accordance with the usual accounting policies of the University.
- Although it is possible that a PI may have submitted numerous proposals that involve more than 100% of his or her effort, the PI, department chair, and college dean must ensure that effort committed to **funded projects** does not exceed that allowed by the faculty or staff member's appointment.
- Unrecovered F&A (indirect) costs may be included as part of cost sharing or matching only with the prior written approval of the federal awarding agency.
- Identifying and providing resources for cost sharing of direct costs (including equipment) is always the responsibility of the Pl.
- Individual agencies may have requirements for cost sharing that differ slightly from each other and from these; check the agency's specific requirements before preparing a proposal budget.
- Similarly, the weight of cost-sharing contributions in the success of a proposal varies among agencies. The National Science Foundation recently adopted the policy that voluntary cost sharing will **not** be considered and proposals submitted with voluntary cost sharing will be rejected from further review
- SIUC's policy is to grant a tuition waiver to all teaching, research, or administrative assistantships, whether the funding is from an external agency or state funds.
- For fellow ships or traineeships provided by external agencies, Graduate School approval for a tuition scholarship (waiver) must be obtained before the proposal is submitted.

VERY IMPORTANT:

Cost sharing represents real costs to the University.

 Cost sharing represents a redirection of departmental and college resources from teaching or other departmental activities to support sponsored projects. The PI, department chair, college dean, and other administrators should carefully weigh the cost-effectiveness and the expected benefits of every proposal for cost sharing prior to making the commitment. They also must be careful that effort committed does not exceed that allowed by the faculty or staff member's appointment. The more dollars expended by SIUC in cost sharing, the fewer dollars come back to campus as F&A (indirect cost) returns for internal redistribution as faculty seed grants, travel support, and other research support.

The more dollars expended by SIUC in cost sharing, the more "expensive" our research appears to be to the Illinois Board of Higher Education in comparison with that of other state institutions.

• If cost-sharing commitments are not met, a portion of the grant funds may have to be returned to the sponsor.

10.22 Facilities & Administrative (Indirect) Costs

The indirect costs, or overhead expenses, of a project are just as real as the direct costs, though less visible. The federal government classifies these expenses as "facilities & administrative (F&A) costs," though you may still see the term "indirect costs" on nonfederal grant application forms. These costs include such things as space and facilities maintenance, utilities, library resources, processing of project-related fiscal paperwork by University service offices (Accounting Services, Purchasing, etc.), monitoring of project expenditures and compliance with government regulations, and numerous other research support services at the University.

It is the University's policy to recover the relevant federally audited F&A (indirect) cost rate (set by the U.S. Department of Health and Human Services) from all agencies that are legally bound by that agreement and from all other federal, state, and private funding agencies that will reimburse the University at the audited rate. The rate varies depending on whether the sponsored project is for research, training, or other activities and whether it will take place primarily on or off campus. In instances where an agency's official indirect costs reimbursement rate is less than the audited rate, or where an agency does not allow any overhead, a reduction or waiver of indirect costs can only be granted by the OSPA director with the concurrence of the Vice Chancellor for Research and Graduate Dean. The agency must provide a written statement of its public policy on indirect costs reimbursement.

In the case of full indirect cost recovery, the relevant institutional rate is assessed on the project's **modified total direct costs (MTDC)**, which exclude the following budget items: equipment, space rental costs, capital expenses, stipends, tuition waivers, and subcontract amounts in excess of \$25,000.

If the agency's reimbursement rate is lower than SIUC's federally audited rate, no budget items are excluded from total direct costs unless the agency's policy stipulates otherwise. Indirect costs are not assessed on equipment grants or on fellow ships.

In addition, indirect costs may be waived by the University on grants-in-aid that meet the following conditions: the grant-in-aid may not exceed \$5,000 per year, and the grant-in-aid is "open-ended" with regard to expenditure of funds, as long as the account is active. A "grant-in-aid" is distinguished from a "grant" by these criteria: (1) the sponsor places no restrictions on the use of funds, other than specifying the research area to be supported; (2) the award is not in response to a formal written proposal; (3) no formal agreement is involved; (4) no report of activities is required by the sponsor (although a technical report available to the sponsor and the general public often is produced); and (5) no financial reporting is required by the sponsor. Where these conditions are met, Grant & Contract Accounting (Accounting Services) will establish a single budget account for each researcher receiving such grants-in-aid and deposit those awards into the common account.

10.23 Limited Proposal Submissions

Certain grant programs limit the number of proposals or letters of intent they will accept from an institution. When more researchers want to apply than are allowed, the University must decide which proposals will go forward to the agency.

Identification

OSPA will explore various websites for limited submission opportunities from our primary funding agencies. Once a limited submission opportunity has been identified, OSPA will make every effort to have them posted on our website the same week. However, please be aware that the list is not comprehensive. Any SIUC researcher who wishes to apply to a limited submission opportunity that is not posted on our website should contact OSPA immediately. OSPA will review the guidelines, establish an appropriate internal deadline, and post the opportunity on our website.

Notification:

To facilitate a fair decision process, researchers wanting to apply to a limited-submission program are required to submit a **Limited Submission Notification form (located under "Find" on the main OSPA website) and pre-proposal** to OSPA at least **60 calendar days** before the agency deadline (regardless of whether the deadline is for letters of intent or for full proposals). Exceptions for specific programs, if any, will be announced on our web site or in Research Matters.

The pre-proposal should consist of:

- 2-page project description describing the scope of the project, expected/intended outcomes, the personnel involved, and existing resources;
- 1-page budget;
- 2-page curriculum vitae.

Internal Review:

The Office of the Vice Chancellor for Research will establish a committee to oversee proposal selection. OSPA will notify all applicants of the committee's decision.

If the number of notifications received by the 60-day deadline does NOT exceed the limit, OSPA will take any subsequent notification forms on a first-come, first-accepted basis. When the program limit is reached, no further notifications will be accepted and submissions will be closed.

Withdrawal:

If the selected applicant withdraws his or her proposal, the applicant who received the next highest ranking from the committee will be notified that s/he may submit a proposal.

Submissions without approval:

If a PI submits a proposal without following these procedures and does not get approval to submit, the University reserves the right to withdrawal the application.

10.24 Principal Investigator Eligibility and Responsibilities

Eligibility: Who Can Serve as a Principal Investigator

- In general, principal investigators (PIs) are faculty members appointed at 50% time or greater. They often serve as fiscal officer of the project as well. Faculty may come from tenured, tenure-track, or non-tenure-track ranks. **Emeritus faculty** may serve as PI if the chair and dean of their former department and college approve, but for legal reasons they may not serve as fiscal officer.
- A/P research staff (researchers/scientists): Those holding the title "Senior Scientist" may serve as principal investigator. "Assistant Scientists" and "Associate Scientists" may not serve as PI unless their department chair/center director and dean make exceptions for them. "Researchers" may not serve as PIs.
- 3. A/P non research staff: These staff may serve as PI if their supervisor approves. The primary criterion is the individual's capability to lead and administratively manage the project. In some cases, a department may decide that the staff member may direct the project but may not serve as the fiscal officer.
- 4. Postdoctoral fellows, graduate students, and undergraduate students may not serve as Pl.

PI Responsibilities

In administering a project, the PI is representing the University and is responsible for upholding the high standards expected of SIUC projects ("best-effort" performance). The overall scientific and administrative integrity of the project, including design and conduct, validity of results, and preparation of manuscripts, rests with the PI. See section 7.3 for detailed information on PI responsibilities.

10.25 Proposal Submission Policy and Procedures

Signature Authority

Grant proposals and awards are processed through the Office of Research Development and Administration. All grant proposals, whether electronic or hard-copy, must be reviewed and approved by OSPA before going to the funding agency. Only the OSPA director or a designee has institutional signature authority. Even when a funding agency's electronic system gives principal investigators (PIs) the authority to submit their own proposals, for legal reasons OSPA approval is required first. Likewise, proposals that do not require an institutional signature still must be approved by OSPA before the PI submits the proposal to the agency. This is also the case when SIUC is a subcontractor with another institution.

OSPA Deadlines

- Once you know you will be submitting a proposal, **contact the OSPA project specialist assigned to your college at least a week in advance of the agency deadline.** If the proposal is to a limited-submission program, you must submit a Notification of Intent to Apply at least 60 calendar days in advance of the agency deadline; see the Limited Proposal Submissions policy.
- Electronic proposals must be made available for OSPA review at least one working day in advance of the agency deadline. Once the proposal is written, print the completed copy and provide to OSPA along with the budget, agency forms, and fully signed Proposal/Aw ard Checklist. After reviewing the proposal (see section 5.5 of this guide), OSPA will submit it or will give the PI authorization to submit it, depending on the agency's submission system. Do not submit a proposal without authorization.
- Note that **OSPA cannot guarantee that the proposal will be submitted if you do not meet this deadline.** Last-minute submissions can overload the funding agency's system, and may result in incomplete information being submitted and a whole host of other problems. OSPA cannot be held responsible in these situations.
- Furthermore, funding agencies assume a proposal has had adequate review and approval before the institution submits it. Proposals written haphazardly and without adequate review reflect unfavorably on the PI and the institution. When a researcher brings a proposal too late for adequate review, the director of OSPA may agree to sign the proposal to meet the agency deadline but **reserves the right to withdraw it from agency consideration** if it is found not to meet University guidelines and standards.
- Non-electronic (hard-copy) proposals: These must be brought for OSPA review one working day in advance of the agency mailing deadline if all you need is proposal review and sign-off. If you want OSPA to mail the proposal, you must bring it two working days in advance of the agency mailing deadline. (See section 5.5 of this guide.) Pls are responsible for making any photocopies required by the agency and for mailing costs. Copies of the final, signed proposal will be provided to the Pl and department chair in electronic PDF format.

10.26 Publication Rights and Proprietary Information

In keeping with the principle of academic freedom (see above), it is the University's general policy that faculty and staff are entitled to full freedom in the publication of research results. In some cases, how ever, such as industry-sponsored or defense-related research, the University recognizes that certain *limited* restrictions on the publication or other dissemination of data may be necessary. Where the sponsor of the research supplies proprietary information to the researcher, for example, the award agreement may include reasonable provisions for the sponsor's review of manuscripts to verify that no such proprietary information is disclosed. (Principal investigators also must take great care to prevent any unauthorized or premature disclosure of proprietary information by the personnel working on their project, since they could be held personally liable for such disclosure.) Other provisions may allow for delay of publication for a limited period of time to protect patent and/or proprietary rights. Any such prior reviews, publication delay provisions, or related restrictions must be negotiated and agreed upon as part of a sponsored project award; they may not be imposed by the sponsor after the fact. In no case will restrictions be agreed to that would constitute a serious threat to academic freedom. The University may turn down an award or request changes in an award agreement if the terms seem unduly far-reaching or if they would hinder the rights of other SIUC faculty to publish freely in a given area. In submitting final research reports to sponsors, researchers may protect their own potentially patentable ideas by labeling the relevant sections of the report as proprietary, or confidential. If this situation will apply, the researcher must alert OSPA before submitting the research report. Reports returned by the sponsor as unacceptable because of material so labeled will be subject to an established on-campus review process.

10.27 Subaward (Subrecipient) Monitoring Guidelines

OSPA has formulated these guidelines for the programmatic and financial monitoring of sponsored project subaw ard recipients. Principal investigators who have made subaw ards from their prime award also should read the section on subawards in section 7 of this guide entitled Grant Management. A subrecipient is a third-party organization performing a portion of an SIUC sponsored project. The terms of the relationship are documented in a subaward (subgrant/subcontract or consortium agreement). These guidelines are intended to assist responsible faculty and staff in ensuring (1) that the subrecipient is conducting its portion of the research in compliance with applicable laws and regulations and with the terms of the award and subaward, and (2) that the subrecipient's portion of the project costs is reasonable and allowable. Subrecipient monitoring is required by the federal government for federally funded subawards.

Roles and Responsibilities

- 1. Principal investigators (PIs) or their departmental grant administrators have primary responsibility for the monitoring of subrecipients to ensure compliance with federal regulations **and** with the terms and conditions of both the prime award and the subaward.
- 2. The Office of Research Development and Administration (OSPA) has responsibility for ensuring that subaward agreements contain appropriate federal and other applicable

regulations consistent with sound business practices and for collection of subrecipient federal audits, if necessary.

- 3. Accounting Services' Grant & Contract Accounting division has responsibility for assisting Pls in reviewing invoices from subrecipients, questioning expenditures if necessary, and general cost allow ability issues.
- 4. Resolution of complex subrecipient monitoring issues or the determination of courses of action will be done jointly by the PI, Grant & Contract Accounting, OSPA, and other administrative officials as appropriate.

Federal Regulations

The federal regulations that describe subrecipient monitoring are general, but contain the following core elements of compliance:

- The routine receipt and review of technical performance reports. The routine review of expenses vs. budget. The option to periodically perform on-site visits, if necessary.
- The option to perform "audits," if necessary.

It is also important to note that there may be additional sponsor-specific or program-specific requirements that mandate collection and documentation of other kinds of assurances (e.g., on lab animals, human subjects, biohazards, etc.) during the course of a project.

SIUC's Subrecipient Monitoring Guidelines

Certain subrecipient monitoring requirements imposed upon federally funded subawards are set forth in OMB circular A-133. Verification of the subrecipient's annual audit must be obtained from each subrecipient whose federal funding level exceeds \$500,000. This is handled by OSPA. Additional monitoring activity includes the following: Collection of Technical Performance Reports - Technical Performance Reports should be reviewed and evaluated on a timely basis by the PI, unusual or unforeseen items should be investigated, and reports should be retained on file in the department for ready access by regulators. In some cases, subaward terms may require specified deliverables in addition to, or in lieu of, technical reports. Review of Invoices and Expenses-to-Budget - For cost-reimbursement subawards, the subrecipient's invoices showing both current period and cumulative expenses-to-budget are generally required. Pls (or their departmental grant administrator) should compare the subrecipient's invoices to the established subaward budgets. Evidence of the regular review of invoices should be in place and retained on file. "Evidence" can be in the form of PI initials or an authorizing signature on invoices, e-mail communications, etc. Clarification of Invoiced Charges - Pls (or their departmental grant administrator) should request explanations for any "unusual," "miscellaneous," "other," or apparently excessive charges invoiced by the subrecipient. If the explanations received are not sufficient to render a prudent judgment on the allow ability of the cost, PIs may request detailed justifications from subrecipients. Examples of detailed justifications that may be requested from subrecipients are:

- Payroll records/data. Copies of paid invoices showing the cost of items purchased, and Vendor Justification Forms, if required by federal contract. Descriptions of services rendered by consultants, including hourly rates and time reports.
- Detail of travel charges incurred, stating the purpose, airfare, meals, ground transportation, unallowables, etc.

Costs determined to be unallow able or unreasonable should be disallow ed. Pls should work with Grant & Contract Accounting to make such determinations. In extreme circumstances where questionable costs remain unresolved, it may be necessary to have an audit conducted. In such situations, Pls should contact Grant & Contract Accounting and OSPA (see Audits, below). *On-site Visits* - On-site visits are a discretionary monitoring procedure. On-site visits conducted by the Pl to evaluate both compliance with the scientific objectives of the project and the appropriateness of the subreceipient's administrative systems, processes, and charges should be documented via correspondence, meeting notes, trip reports, etc., and retained on file. *Audits* - Discretionary audits of subrecipients are an acceptable monitoring procedure under federal regulations, and all of SIUC's cost-reimbursement subaward agreements contain "right-to-audit" clauses. Formal audits are performed very infrequently, how ever, and departments should contact Grant & Contract Accounting and OSPA before proceeding.

10.28 Supervision and Reporting of Research

As a general rule, sponsored research at the University is conducted independently, in accordance with the principle of academic freedom. Technical direction or joint supervision of research is accepted only with the concurrence of the principal investigator. The PI must provide research reports to the sponsor at times specified in the award agreement.

10.29 Use of University Name

Industry sponsors may not use the University's name in publicity or advertising of any kind unless: (1) prior written approval has been obtained from the SIUC chancellor, or (2) the award agreement contains provisions governing the use of the University's name by the sponsor, in which case the sponsor must comply with all stipulations. University employees engaged in non-University business may not use the University name or their title in connection with those activities unless they have prior approval. See SIUC's conflict of interest policy.