

# **Managing Your Research:** **Office of Sponsored Projects**

## **A Principal Investigator Handbook for Sponsored Research**



**Office of Sponsored Projects  
Faculty Education Working Group**

*<http://www.dartmouth.edu/~osp>*

# INTRODUCTION

This is a general guide for *all* of Dartmouth College;  
division-specific sections follow the main text.

**NOTE: A special thanks to Frank Lemire at [Worcester Polytechnic Institute](#) for kindly sharing his copy of the Faculty notebook that his office created and he presented at a National Council of University Research Administrators meeting. We adapted his notebook to our own version.**

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- Technology Transfer Office

## WHERE TO GO FOR ASSISTANCE

The Office of Sponsored Projects (OSP), together with the [Research Grant Managers \(RGMs\)](#) across campus, work to provide the best possible service to faculty and staff interested in submitting proposals for external funding. Under our current procedure, proposals to external sponsors should be submitted to OSP.

Some projects may be submitted through [The Office of Foundation Relations](#) in later stages, but that determination will be made after evaluation by OSP.

OSP and the Office of Foundation Relations will coordinate submissions and future management of the projects.

**Contact Email: [Sponsored.Projects@Dartmouth.edu](mailto:Sponsored.Projects@Dartmouth.edu)**

(Appendix: [OSP Staff Directory](#))

## Frequently Used Acronyms

A&S -	Arts & Sciences
COEUS -	Grant Management and Tracking System
COI -	Conflict of Interest
CM -	Cash Management
CPHS -	Committee on Protection of Human Subjects
DMS -	Dartmouth Medical School
ePRF -	Electronic Proposal Routing Form
FAR -	Federal Acquisitions Regulations
GL -	General Ledger
IACUC -	Institutional Animal Care and Use Committee
IRA -	Institutional Reporting Analysis
IRB -	Institutional Review Board (see CPHS)
NIH -	National Institutes of Health
NSF -	National Science Foundation
OGA -	Oracle Grants Accounting
OMB -	Office of Management and Budget
OSP -	Office of Sponsored Projects
OSP-IS	Office of Sponsored Projects, Information Systems
PA -	Program Announcement
PD -	Project Director
PI -	Principal Investigator
PTAEO -	<b>P</b> roject, <b>T</b> ask, <b>A</b> ward, <b>E</b> xpenditure type, <b>O</b> rg: a five-segment account identifier used to track and report sponsored research projects and purchase transactions.
RFA -	Request For Applications
RGM -	Research Grant Manager
SRM -	Sponsored Research Manager
TTO -	Technology Transfer Office

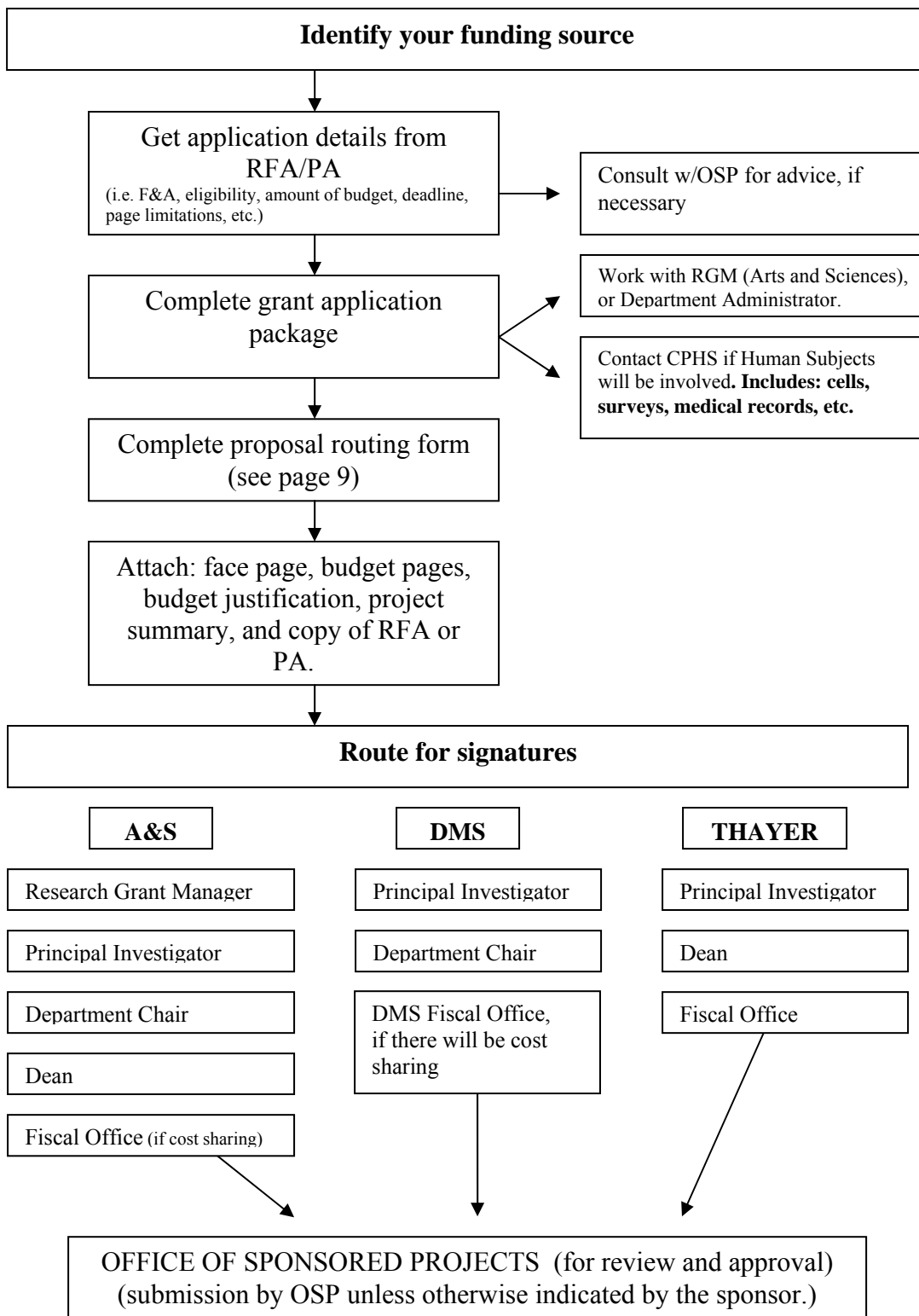
## BEFORE PROPOSALS MAY BE SUBMITTED...

- Two forms are required to be completed and submitted to OSP prior to submitting a grant from Dartmouth. They are:
  - [Invention Agreement](#)
  - [Conflict of Interest Disclosure Form \(COI\)](#)

These forms can be found on the OSP website: <http://www.dartmouth.edu/~osp/> under “Forms”. Samples can be found in the appendix. (Appendix: [Invention Agreement](#), [Conflict of Interest](#))

- The [Proposal Routing Form](#) must be completed for all proposals submitted to external funding agencies. This form is used to route proposals for on-campus signatures and also serves as the data entry form for COEUS, the Sponsored Research database at the College. To add a new user to this database, please send an email to [coeus-help@mac](mailto:coeus-help@mac) requesting registration as a new investigator. (Note: this is a requirement for all Dartmouth Co-PIs *and* Key Personnel as well)
- Most sponsors now require electronic submission for proposals (such as Grants.gov and NSF’s Fastlane). In order to access these online sites investigators must be registered. Please send an email to [Sponsored.Projects@dartmouth.edu](mailto:Sponsored.Projects@dartmouth.edu) to request registration with any and all necessary sponsor(s).
- Please review the applicable division-specific section at the back of this manual for any exceptions, additional requirements, and/or further information.

# STEPS IN OBTAINING SPONSORED PROGRAM FUNDING



## **PROPOSAL COMMITMENTS**

When a proposal is submitted to an external sponsor, a wide range of infrastructure, technical, and financial commitments are made and/or implied. In the event an award is made, it becomes critical that the College is able to deliver the promises it has made.

### **Direct Commitments**

- Time and effort
  - Principal Investigator (PI)
  - Other Key Personnel
  - Postdocs
  - Graduate Students
  - Undergraduate Students
  
- Facilities
  - Laboratory space
  - Office space
  - Classroom space
  
- Equipment
  - Computer Use
  - Scientific Equipment Use
  - Machine or Other Shop Use

### **Peripheral Commitments**

- Departmental Staff and Other Resources
- Research Administration
- Research Accounting
- Any Office/Department services used in connection with award

# THE SUBMISSION PROCESS

## Before Contacting OSP...

- Is the PI eligible to submit a proposal? (Appendix: [PI Eligibility policy](#))
- Communicate with your Department Administrator or Research Grant Manager (RGM).
- Review sponsor guidelines.** If the sponsor limits the number of submissions per institution, please contact OSP *well in advance*, because there will be an institutional selection process. See procedures outlined on the Office of Foundation Relationships web site:  
<<http://www.dartmouth.edu/~ofr/limited.html>>
- Determine the scope of the project (i.e., duration, who will participate, approximate cost, etc.)
- Gain the support of the department head for any required resources (i.e., release time, facilities, grad. students, etc.).
- Ensure that the envisioned project will in fact meet the requirements imposed by the sponsor.

## WHAT TO LOOK FOR...

These are examples of items to note in sponsor guidelines; it is *not* intended to be a comprehensive list:

- Limitations to the number of applications per institution or department. See procedures outlined on the Office of Foundation Relationships web site: <<http://www.dartmouth.edu/~ofr/limited.html>>
- Restrictions on an applicant's years of experience, position, or years in a position.
- Whether PI salary can be included in the budget.
- Page limitations and whether appendices may be included.
- Restrictions on concurrent applications to other programs or sponsors or overlapping support for proposed project.
- Letter of intent or pre-proposal requirement.
- Cost-sharing or matching funds requirement.
- Restrictions on indirect cost rate.
- Restrictions on the participation of foreign nationals.
- Publication restrictions.
- Requirements of data, resource, or intellectual property sharing.
- Export controls: requirements of federal licenses for sharing information or materials abroad.

## **Suggested Boilerplate Resource Language**

Trustees of Dartmouth College, commonly known as Dartmouth College, is a corporation created by Royal Charter and exists under the laws of the State of New Hampshire. It is a private, four-year, liberal arts, coeducational college with schools of business, engineering, and medicine, as well as 16 graduate programs in the arts and sciences. Its 200-acre main campus includes such facilities as the Hood Museum of Art, the Hopkins Center for the Creative and Performing Arts, the Hanover Inn, the Dartmouth Skiway, the Berry Sports Center, the Kiewit Computation Center, and the Burke Laboratory. It maintains a regular faculty and curriculum and normally has a regularly enrolled student body of over 4,000 undergraduate students and 1,000 graduate students in attendance at Hanover, New Hampshire, where its educational activities are regularly conducted.

The College library system is headquartered in the Baker-Berry Library, located in the heart of the campus. In addition to Baker-Berry Library, there are ten other libraries on campus that serve the specialized needs of several academic departments and the three professional schools of the College (Dartmouth Medical School, Thayer School of Engineering, and Amos Tuck School of Business Administration). The library system makes available approximately 2.4 million printed volumes, 2.6 million microform pieces, 20,000 serial subscriptions, and 2,500 networked electronic resources to students, faculty, and other members of the College community.

Dartmouth Medical School is the fourth oldest medical school in the United States. In addition to its four-year curriculum leading to the M.D., the Medical School offers an M.D.-Ph.D. program for persons wishing to become physicians qualified to direct research in a medically-related area of basic or applied science. The Medical School also operates a Center for the Evaluative Clinical Sciences which offers graduate and continuing education programs and conducts research on medical practice and outcomes of treatment.

## The Dartmouth Proposal Routing Form

The Dartmouth Proposal Routing Form is an important, mandatory tool used by:

- Your department chair to gain a sense of the content of your proposal, and any departmental obligations (space, equipment, etc.).
- OSP to track compliance required information, such as Conflict of Interest disclosures, animal usage, etc.
- OSP to complete its review of proposals and enter data into COEUS, its proposal and award management tracking database.

This form should be completed, approved, and forwarded with every proposal within the seven (7) day recommended lead times described on the next page, before OSP proposal review can begin.

Visit the OSP website for the most up-to-date routing form and instructions:  
<http://www.dartmouth.edu/~osp/resources/forms.html>

[Click here for a sample routing form.](#)

## **PI Considerations: Notification and Recommended Lead Times**

### **Proposal Submission Deadline Policy**

The Proposal Submission Deadline policy is intended to incorporate a sufficient time period that would allow for review and submission of all requests for externally funded grants and contracts. Proposals are reviewed at the Department, School and OSP levels. The proposal review process encompasses review of a variety of institutional considerations and seeks to assure compliance with sponsor requirements, institutional policies and other regulatory requirements.

### **Due Dates:**

Submission Type	Due Date (# business days PRIOR to sponsor deadline)	Items Required for Submission to OSP
All Proposals, electronic and paper submissions	9:00 am 7 Business Days PRIOR to Deadline	Proposal <u>Review</u> Materials (See below for specific requirements)
Electronic submissions only	9:00 am 2 Business Days PRIOR to Deadline	Final Proposal Package for <u>Submission</u> with research plan now "ready to go"

### **30-90 Days PRIOR to the Deadline**

*The Principal Investigator informs Department and OSP of intent to submit.*  
As soon as the principal investigator decides to submit a proposal he/she should inform the leadership of their department or school, their department finance/grant management staff and the Office of Sponsored Projects of his/her intent. This allows OSP to begin communication with the PI and the Department Administrator and to plan the flow of proposal submissions. This prior notification is especially important in the following instances:

- Large, complex programs
- Multi-project programs, involving Dartmouth departments and/or other institutions
- Unusual terms and conditions referenced in the funding announcement
- Limitations on the number of institutional applicants (Note: Limited applications are selected through a process in the Provost's office. See procedures outlined on the Office of Foundation Relationships web site: <<http://www.dartmouth.edu/~ofr/limited.html>>)
- Requests for deviations from School or College policies or practices
- New initiatives involving significant resources requiring School/departmental approvals

### **Seven (7) Business Days PRIOR to the Sponsor Deadline (9:00am)**

*PI / DEPT submit Proposal Review Materials to the Office of Sponsored Projects. To begin the review and assist OSP in an orderly and efficient process, please submit as a package consisting of the following materials:*

- Signed Routing Form.
- Sponsor guidelines, funding announcement
- proposal abstract,
- budget- including commitments for any matching funds.
- budget justification,
- list of key personnel
- Any special administrative documents required by the sponsor or prime collaborator.

### **OSP Review Process:**

*The Office of Sponsored Projects Reviews the Proposal Materials*

- The OSP proposal review process assists the PI to ensure compliance with sponsor and institutional policies.
- **Electronic submissions:** When the proposal review has been completed the OSP proposal coordinator will inform the principal investigator and department administrator of any changes to be made. It is the responsibility of the PI /DEPT to make these changes. There is no further review by OSP.
- **Paper Proposals or Department Submission to Sponsor:** The PI / DEPT will receive the signed proposal forms back from OSP to be

submitted to the sponsor by the department. Please note that the department is responsible for final, editing, formatting and complete submission.

- A full electronic copy should be sent to OSP for filing.

## **Two (2) Business Days PRIOR to the Sponsor Deadline (9:00am)**

### *Electronic Submissions: Delivery of the Final Proposal Package to the Office of Sponsored Projects for Submission to the Sponsor*

- The PI /DEPT must release the complete proposal to the Office of Sponsored Projects by 9:00am two (2) business days PRIOR to the deadline for electronic submission to the sponsor. This allows time for possible technology slow downs and for the PI / DEPT to make corrections in response to system errors indicated by Grants.gov (or other electronic systems). Proposals are listed in the queue and submitted to the sponsor as soon as possible.
- Via email from Grants.gov or directly from the sponsor, the PI / DEPT monitors submission of the proposal through to Sponsor acceptance of the proposal for review. If there are errors requiring correction, the PI / DEPT makes the necessary corrections and contacts OSP to resubmit.

### **Late Submission to Internal Deadlines**

If proposal materials do not reach the Office of Sponsored Projects by the internal deadlines the proposal is considered *late*. The proposal is added to the queue. The PI assumes the risk that he/she may need to correct errors in electronic submissions and that the final proposal deadline may be missed.

## Proposal Submission Checklist

### Personnel

- 1. Is the PI clearly identified?
- 2. Is the PI eligible to submit proposals? (Appendix: [PI Eligibility](#))
- 3. Does the PI have an actual or perceived conflict of interest in her/his relationship with the sponsor?
- 4. Are the PI and all project personnel familiar with the Dartmouth College [Misconduct Policy](#)?
- 5. Are there any Co-PIs or key personnel involved in the project?
- 6. Are the levels of effort stated for key personnel reasonable?
- 7. Has appropriate approval been given for the proposed level of effort, commitment of space and resources, etc. for every person with effort listed on the application?

Proposals should accurately represent the amount of time that key personnel are committing to the project. In preparing proposals, PIs must be careful not to over commit themselves or others. In determining percentage effort, the PI must take into account the time required for teaching, committee meetings, clinical and campus citizenship. (NOTE: For research faculty whose salaries are being paid 100% out of grant funding, you may not claim *grant writing* as a direct expense to a sponsored project.)

### Institutional Assurances

1. Have the appropriate forms, including required assurances and certifications, been used?
2. Will there be subcontractors/consortium sites conducting off-campus activities? If so, are letters of intent, scopes of work, and budgets in hand?
3. Is a letter of intent/scope of work included for each consultant?
4. Are current space & facilities resources adequate for the project?
5. Does the proposal promise any institutional commitments beyond the proposed period of performance? If so, this must be approved by all appropriate authorities.
6. Will there be the use of animals or humans in the project? If so, has IACUC (Institutional Animal Care and Use Committee) or IRB (Institutional Review Board) approval been granted?
7. Does the project involve the use, or will it result in the creation, of any research risks (i.e., hazardous materials, chemicals, recombinant DNA)?
8. Does the proposal contain any proprietary material? If so, are these sections of the proposal labeled appropriately?
9. Do any known publishing, intellectual property, or other sponsor restrictions exist for which a negotiation may be necessary? (Appendix: Technology Transfer Office)
10. Do export controls apply?

## Administrative

1. Is all required proposal content included, accurate, and in the proper order as the sponsor expects to see it?
2. Have the proposed start and end dates been clearly stated? Are these dates reasonable, given the submission date?
3. Is the proposal formatted in accordance with sponsor guidelines (i.e., correct form version, number of pages, page numbering, spacing, margins, font size and style, electronic file type)?

## Fiscal

1. Is the proposed budget accurate, complete and reasonable?
2. Are all budgeted costs allowable and allocable (as per [OMB Circular A-21](#))? Can all costs be supported if audited by the government?
3. Have currently approved rates for fringe benefits and indirect costs been used? (Appendix: Institutional Profile)
4. Is the PI anticipated effort, and that of Co-PI and Key Personnel, accurately reflected in both the budget and justification? Has the percentage of effort been derived prudently?
5. Have annual increases been calculated for the “out” years (the project period beyond year 1)?
6. Are the proposed costs necessary to conduct the project?
7. Are travel costs based on sponsor guidelines or the Dartmouth College Travel policy? (Appendix: [Dartmouth Travel Policy](#))
8. Have tuition costs for graduate students been requested?
9. If the project will involve the use of institutional facilities (e.g., animal care, machine shop, computing), have these costs been included in the proposal at currently approved rates?
10. Is cost-sharing required by the sponsor? If so, have the appropriate institutional approvals been obtained?
11. Is any cost-sharing mentioned in the body of the proposal? (Such would become *mandatory* cost-sharing if funded.)
12. Is the PI anticipated effort, and that of Co-PI and Key Personnel, accurately reflected in both the budget and justification? Has the percentage of effort been derived prudently?
13. If PI, Co-PI, or Key Personnel are not requesting salary, has it been discussed with OSP or the RGM whether or not [cost-sharing](#) is required?
14. Do any [matching funds](#) need to be raised during the life of the project? If so, does this activity need to be coordinated with the Development Office?
15. Is a budget included for each subcontractor? Is it accurate and reasonable and has it been approved by the subcontractor’s institutional authorized official?

## **Electronic Submissions**

1. Does the PI have the required electronic access to (i.e., user ID, password) and knowledge/training in how to use the sponsor's particular electronic proposal system (i.e., grants.gov, NSF FastLane, etc.)?
2. Is the format preserved accurately when viewed by the sponsor?
3. Can the proposal be submitted in sufficient time to allow for interruptions in internet services?

## OSP Proposal Preparation Resources

Contact Email: [Sponsored.Projects@Dartmouth.edu](mailto:Sponsored.Projects@Dartmouth.edu)

- Identification of [funding opportunities](#) and interpretation of sponsor requirements
- Registration with sponsors' particular electronic systems when/if necessary
- Assistance with preparation of forms (assurances, certifications)
- Liaison activities with sponsor administrative contacts
- On-campus bulletins (Dartmouth Daily Updates) and referring to the [OSP website](#) for important updates
- Distribution of weekly [NIH Funding Opportunities and Notices](#) and [NSF Updates](#)
- Departmental and special interest group workshops

## **The Conflict of Interest Disclosure**

Dartmouth College has an institutional policy in compliance with federal requirements which it applies to all sponsored projects. All investigators and key personnel are required to disclose at least annually (or more frequently, if new reportable information is obtained during the period of an award) any actual or perceived conflicts of interest to the College which could impact the objectivity of the research proposed.

NOTE: As this is a confidential document, disclosures are to be submitted directly to the Director of Sponsored Projects, HB 6210, or via email to: [Jill.M.Mortali@dartmouth.edu](mailto:Jill.M.Mortali@dartmouth.edu)

NOTE: A proposal cannot be processed by the Office of Sponsored Projects without a current COI on file.

(Appendix: [COI policy](#) and [COI Disclosure Form](#))

# **COST TYPES-- DIRECT AND INDIRECT**

## **DIRECT COSTS**

Direct costs are defined by the federal government in [Office of Management and Budget Circular A-21](#) as “costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.”

The following direct cost categories are typically used on most proposals.

### **Personnel: Salaries and Wages**

Starting with the principal investigator, list the names and positions of all “key” personnel.<sup>1</sup> Then list the names and positions of all support personnel. Determine the “level of effort” or other measure of time commitment to the program for each individual. Generally, salary support for administrative and clerical staff cannot be requested in a grant budget, unless the project's requirement for these personnel is much greater than the level of routine services the academic department provides. **\*\*Time spent on proposal preparation may NOT be allocated to a grant as a direct cost.\*\***

Fringe Benefits - Indicate the total amount of fringe benefits, based upon the institution's approved rate structure(s). (Appendix: [Institutional Profile](#))

### **Equipment**

Separately list each item of equipment with a unit cost greater than \$5,000. Always provide an adequate justification of the need for each item requested.

### **Travel**

Describe the purpose and destination, when known, for the trip(s) and the individual(s) for whom travel funds are being requested. First class airfare is not allowed and all foreign travel using federal funds must be on US flag carriers (may be applicable to non-federal awards; ask OSP SRM to contact sponsor for specific information). (Appendix: [Dartmouth Travel Policy](#))

<sup>1</sup> NIH definition: “Key personnel are defined as all individuals who contribute in a substantive way to the scientific development or execution of the project, whether or not salaries are requested. Typically, these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level should be included if their involvement meets the definition of key personnel.”

## **Professional Services**

Indicate the name, when known, of each consultant and itemize costs including number of days, daily rate of pay, travel, and other related costs. A Letter of Intent to participate in the project should be appended to the proposal.. Please note that some agencies (such as NSF) have limits on daily fees.

## **Consortium/Contractual Costs**

- **Direct Costs** - costs allowable under sponsor regulations.
- **Indirect Costs** - determined by applying the federal or sponsor-negotiated rate for the collaborating institution.

Proposals that include consortium sites (subawards) must include: letter of intent to establish a consortium arrangement, signed by the consortium site's institutional official; budget with justification; statement of work (a clear description of the work to be done to achieve the objectives of the research, including specific deliverables, if applicable, and time frame); and other documents that may be required by the sponsor.

## **Materials and Supplies**

For items such as chemicals, electronics, and laboratory materials to be used on the project. On federally sponsored proposals, do not include general office supplies, such as notebooks, paper, or pens.

## **Other Direct Costs**

Itemize by category, such as publications, graphic services, photography, maintenance and service agreements, computer charges, rentals and leases, service centers, tuition/fees, animal costs, and IRB fees (unlike many institutions, Dartmouth does not include IRB fees in its indirect cost proposal, hence it may be appropriate to note this in the budget justification). Photocopying, postage, and telephone costs are generally part of Dartmouth's indirect cost recovery and should only be listed if they are *intrinsic* to the proposed project (i.e., extensive surveys conducted by mail or telephone).

## **INDIRECT COSTS**

**Indirect Costs (also known as Facilities & Administrative Costs or F&A) are defined as those costs that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, instructional activity, or any other institutional activity.**

Indirect costs include expenses that cannot be charged directly such as lights and heat, snow removal, building maintenance, general office supplies, telephone line charges, cell phones, postage, and the services of administrative offices such as OSP.

If a PI is considering any of the expenses as a direct charge to an award, s/he must provide an adequate justification in the proposal, explaining the unique requirement. If these items are not specifically and adequately identified and justified in the proposal, they will not be allowed by the College, even if the sponsor awards the budget as proposed. If, during the course of an award, these types of expenses must be charged to the grant, the situation must be discussed with the OSP SRM prior to incurring the expense.

“Any research project must cover two components of costs - those directly attributed to the project and those incurred for the general support and management of research.

“...If sponsors of research projects do not fully reimburse the costs, they must be paid from other institutional funds.”

*-American Council on Education*

Please refer to the updated [institutional profile](#) at the OSP website for current indirect (F&A) cost rates.

**\*\*\*\*Some Costs Covered by Indirect Costs\*\*\*\***

General Administration

Accounting  
Payroll  
Admin offices  
Procurement Services

Facilities Operation & Maintenance

Utilities  
Janitorial Services  
Repairs

Sponsored Project Administration

Departmental Administration

Business Managers  
Department Administrators

Depreciation

Buildings  
Equipment

Library Expenses

## **BUDGET JUSTIFICATIONS**

Generally a cost without a reasonable justification invites elimination by the sponsor. There are a variety of methods used to justify amounts requested and **many sponsors require that their guidelines be followed.**

See samples of simple and complex budget justifications in the appendix.  
(Appendix: [Budget justification samples](#))

## **COST-SHARING OR MATCHING**

While [OMB Circular A-110](#) defines cost-sharing or matching interchangeably as meaning "that portion of project or program costs not borne by the federal government," many institutions commonly differentiate between the two, as follows:

### **COST-SHARING**

The portion of project or program costs funded with institutional funds.

*NOTE: uncompensated effort on a project is considered cost-sharing and must be addressed and approved. See division-specific sections for further information.*

### **MATCHING**

Funds raised by the institution from external sources for the purpose of supporting a portion of project or program costs, including cash and in-kind contributions of time and effort, equipment, etc.

### **IN-KIND CONTRIBUTION**

Donated materials or services in support of a sponsored research project.

A further breakdown by type of cost-sharing will be tracked for all proposals and awards.

Regardless of what terminology is used, these cost-sharing/matching contributions must meet all of the following criteria in order to qualify as cost-sharing or matching under federally-funded programs or projects subject to [OMB Circular A-110](#):

1. Verifiable from the recipient's records.
2. Not included as contributions for any other project or program that is federally-assisted (i.e., no "double-dipping").

3. Necessary and reasonable for proper and efficient accomplishment of project or program objectives.
4. Allowable under the applicable cost principles, which, in Dartmouth's case, is [OMB Circular A-21](#).
5. Not paid by the federal government under another award, except where authorized by federal statute to be used for cost-sharing or matching.
6. Provided for in the approved budget when required by the federal awarding agency.

Upon receipt of an award, the tracking of cost-sharing and/or matching is the responsibility of the [OSP SRM](#). The recipient department must be able to document, reconcile and justify this type of expense throughout the life of an award and ensure that all cost share obligations, including uncompensated time, are met.

## **OBTAINING COST-SHARING APPROVAL AT DARTMOUTH**

Contact OSP Pre-Award to discuss sponsor requirements (programmatically-required cost-sharing levels, budget caps, etc.) and any other cost-sharing (i.e., uncompensated effort).

Determine your level and source of cost-sharing and communicate your plan with the appropriate dean or designee.

All cost-sharing must be approved in advance by the appropriate dean or designee on the proposal routing form (**signature and Department account number/GL string**). The commitment to provide in-kind cost-sharing by other organizations should be documented in writing in a letter signed by an authorized official of the organization and attached to the proposal routing form. Please use OSP's in-kind form, as well (Appendix: [In Kind](#)).

Cost-sharing above the sponsor required level promised in the proposal text, becomes mandatory cost-sharing when an award is made and therefore must be documented and tracked by Dartmouth. Again, the Dean or designee needs to approve.

A Foundations Relations officer must approve any matching funds raised by an outside sponsor.

## Negotiations

Negotiations between OSP Pre-Award and the potential sponsor are sometimes necessary, especially if the award is a contract, in order to attain terms and conditions for conduct of the project which protects the interests of the sponsor, the College, and the investigators.

Negotiating points may involve issues such as:

- intellectual property rights
- licensing
- patents
- type of payment (up front, scheduled, cost reimbursement?)
- financial reporting requirements (i.e., no paper receipts, no itemized detail)
- deliverables (what will the sponsor expect to receive during the life and upon completion of the award?)
- indemnification (who's responsible when something goes wrong?)
- publications (is prior review by sponsor required?)
- confidentiality (what can be disclosed?)

Normally, Dartmouth does not accept prohibitions on the participation of foreign nationals in sponsored research projects or restrictions on the publication of research results.

Any concerns on the part of the investigator should be conveyed to OSP Pre-Award.

Please refer to the “Sponsored Research” chapter of the Arts & Sciences Faculty Handbook (Appendix: [A&S Faculty Handbook](#)) and the OSP website (<http://www.dartmouth.edu/~osp/policies.html>) for institutional policies governing some of these negotiation points.

## **Site Visits**

Occasionally, proposals involving large scale or complex scopes of work will result in a site visit by the sponsor. The purpose of these site visits is to reassure the sponsor that the program will be completed successfully. These visits may occur prior to funding or during the project period. Issues involved in site visits include programmatic clarification, project timetables, staffing, reviews of financial and organizational controls, and tours of facilities. They can and often do take as many as three days to complete and require participation by faculty and administrative staff. Many agencies are substituting teleconferences for site visits to reduce costs.

PLEASE inform OSP as soon as you have been contacted about scheduling a site visit. OSP is frequently included in these visits to provide information on the institution's administrative structure, financial management systems, and compliance systems and it is at the center of these activities and all communications with external parties (i.e., funding agencies).

## **FOLLOW-UP ON PENDING HUMAN/ANIMAL APPROVALS**

Please read sponsor guidelines carefully regarding human and animal research subject approvals. Some sponsors require institutional approval letters at the time of application submission. Many sponsors are adopting NIH's "just-in-time" mechanism for final Institutional Review Board (IRB)/Institutional Animal Care and Use Committee (IACUC) approvals to reduce the burden on institutional boards for projects that might not be funded. Because there might be little time between notification that a proposal might be funded and the award, it is recommended to prepare the IACUC or IRB application in advance (Appendix: [IACUC](#), [IRB](#)). Many sponsors will not make an award unless final IACUC or IRB approval is in hand.

Please contact the [Committee for Protection of Human Subjects \(CPHS\)](#) at an early stage about the status of your project in terms of human subjects. Projects involving surveys, human cells, or medical records may require IRB approval. The CPHS staff will provide advice about the level of review required (expedited, full committee, etc.) and the associated fees.

# AWARD MANAGEMENT

## **Award Types:**

The following are the most typical award instruments used by the federal government and other sponsors:

### **Grant**

- Investigator-initiated project
- Investigator defines details and retains scientific freedom
- No substantial involvement between sponsor and recipient during project performance
- Most flexible award; allows the investigator control over the project

### **Cooperative Agreement**

- Substantial involvement in the project by both sponsor and recipient

### **Contract**

- Project conceived by sponsor
- Used to acquire product or services for the direct benefit of or use by sponsor
- Generally requires strict adherence to budget
- Sponsor exercises direction or control

## **Award Processing:**

When [awards are received](#), the following steps are taken:

- OSP Pre-Award reviews award terms and conditions to ensure they are appropriate for the College.
- OSP Pre-Award reviews the amount of effort proposed and awarded to ensure it is in compliance with current policy.
- OSP [Notice of Award \(NOA\)](#) Processing then transmits the NOA to Department/RGM, OSP SRM, and the PI.
- Department/RGM or the PI is required to prepare and submit an itemized budget to OSP PTAE0 Processing before an OGA number (PTAE0 String) can be assigned and the account set up.
- OSP PTAE0 Processing assigns an OGA number (PTAE0 String) to the award, enters the award in the OGA system, and sets up the indirect cost allocation program.
- OSP IS prepares and transmits reports of new awards to various offices, including Public Affairs, the Provost's Office, and the Dean's Office.

## **Pre-Award (Advance) Spending:**

### Prior to Notice of Award:

A PTAE0 String is required in order to set up an account in advance of the start date. Additionally, *if authorized by the sponsor and if conditions warrant*, the PI may also request "pre-award spending" of up to 90 days prior to the start date.

All requests must be approved by the department head and then forwarded to an [OSP SRM](#) for review and final approval.

It is important to understand that any expenses incurred prior to the receipt of an actual award will become the responsibility of the incurring academic department in the event the expected award does not materialize.

[Click here to access the Pre-award Spending form](#) for requesting advance accounts and/or pre-award costs.

## POST-AWARD REQUIREMENTS

The PI, as Project Manager, has three primary responsibilities (described in greater detail in [“The Principal Investigator’s Quick Guide for Sponsored Activities”](#)):

- Managing the resources of the project.
- Planning and controlling the work of the project.
- Communicating with individuals and groups about the project.

Each award received by the Trustees of Dartmouth College on behalf of Dartmouth faculty can have a variety of reporting requirements with which the College must comply during the life (project period) of the award and beyond. OSP transmits copies of all awards to the PI, the Department Administrator or RGM, and the OSP SRM to make everyone aware of the terms and conditions of awards, including which reports will be due and report deadlines.

Upon receipt of an award transmittal, investigators must become familiar with the award terms and conditions. Any questions about what will be required should be addressed immediately by contacting the OSP SRM and/or the [Department Administrator or RGM](#). Below are the typical characteristics that apply to the various types of reporting requirements:

### **Programmatic Reporting and/or Other Deliverables**

- Completion is the responsibility of the PI, or in the absence of the PI, the Key Personnel.
- Reports are normally called technical, narrative or progress reports. Other deliverables could include software, manuscripts, fabricated equipment, etc.
- Reports can be required as often as monthly or as infrequently as once during or after the award period.

- If not completed to the sponsor's satisfaction, an inadequate report may give rise to termination, withholding of funds, freezing of sponsored funds to the institution, etc.

### **Financial Reporting**

- It is the responsibility of the [Department Administrator or RGM](#) to submit the final reconciled directs, plus any backup documentation, to the OSP SRM.
- OSP's Cash Management has the primary responsibility for completion and submission of all invoices and financial reports (FSRs).
- Reports may be required quarterly, semi-annually, or annually; invoicing may also be required, per the Terms and Conditions of the NOA.

### **Subaward Management:**

The PI is responsible for monitoring periodic progress reports and invoices for compliance with terms of the contract. As a result, the PI is expected to:

- Maintain good communication with the subrecipient PI;
- Review subrecipient institution's reports and incorporate them into the project's progress reports;
- Review all invoices to ensure that expenses are appropriate and aligned with technical progress. Only the PI can approve payment of subaward invoices.

Non-compliance with technical reporting requirements or dissatisfaction with the level of subrecipient progress should be reported immediately to OSP. If there are issues with costs and /or work progress, the PI should not sign off on the invoice in question. A revised invoice will be requested from the subrecipient or the invoice will be suspended until issues are resolved.

## Other Reporting

- Capital Equipment Reporting is normally performed by the Department's capital equipment custodian (Appendix: [Equipment reporting](#)). Assistance from the PI may be required to reconcile property records with award expenditures.
- Invention and Patent Reporting - requirement varies from sponsor to sponsor. Potential inventions should be brought to the attention of the Technology Transfer Office (TTO) (Appendix: [Tech Transfer Office](#)).

Please submit an [Invention Disclosure form](#) to TTO at least 90 days prior to sharing information in presentations or publications related to any possible invention, in order to secure intellectual property rights.

In particular, NIH (National Institutes of Health) requires that final invention statements be submitted electronically by the PI via the NIH Commons.

- *Property Reports:* Some Federal sponsors may require an annual statement of the use of any and all Federal property on a sponsored project.

## PI CLOSE-OUT RESPONSIBILITIES

The following is a checklist of the PI's responsibilities at the time of closeout. Items may vary by department; please check with the Department Administrator or RGM or the [OSP SRM](#) assigned to your department.

### 90 days before budget/project end date:

- Review report schedule and reporting requirements.
- Ensure subaward recipients have met goals.
- If a [no-cost extension](#) will be required, notify the Department Administrator or RGM, prepare and submit the required internal request form and send the request to OSP SRM via e-mail.
- Determine if cost-sharing requirements have been met.

### At budget/project end date:

- Review all charges, including salary and benefits.

### Within 60 days after budget/project end date:

- Ensure subaward recipients have met goals.
- Notify [OSP SRM](#) if subaward is subject to de-obligation ([Request for the Issuance of a Subaward](#)).
- Sign final labor verification by grant account form.
- Prepare/submit timely final reports: technical, invention, property, contractor's release, subcontract, Contractor's Assignment of Refund, Rebates, Credits, and other amounts (reporting requirements are sponsor-specific).  
**All financial reports (FSR's) are prepared and submitted by the Cash Management Office of OSP.**

### Within 90 days after budget/project end date:

- Contact OSP SRM via e-mail when project is complete and ready for closeout.
- If Dartmouth College has approval to retain the residual funds, send the relevant GL string to the OSP SRM via e-mail.  
[Please refer to the Unexpended Funds Policy.](#)

### Provide OSP with copies of all final reports.

Ultimately, the PI is responsible for ensuring that all requirements have been met.

## **THE REGULATORY ENVIRONMENT FOR FEDERAL AWARDS**

Depending on the type of federal award and the agency providing it, there can be myriad differences in the requirements with which Dartmouth must comply. This section will not try to cover all of the possible scenarios but will point out the key compliance elements that are consistently applied to most Dartmouth business transactions with the federal government.

# RELEVANT REGULATIONS AFFECTING DARTMOUTH

## Office of Management & Budget (OMB)

### [Circular A-21 - Cost Principles](#)

(Applicability: Grants, Contracts, Cooperative Agreements)

[http://www.whitehouse.gov/omb/circulars/a021/a21\\_2004.html#f](http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html#f);

[http://www.whitehouse.gov/omb/circulars/a021/a21\\_2004.html#j](http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html#j)

### What It Covers...

- **ALLOWABLE:** An “allowable” cost is one that is eligible for reimbursement by the federal government. Generally it is not the type of cost that determines allowability; it is the purpose and circumstance of the expenditure.
- **ALLOCABLE:** The cost, or a group of costs, must be assignable to the project in a reasonable and realistic proportion that directly benefits a sponsored research award.
- **REASONABLE:** The cost must be able to withstand public scrutiny, i.e. objective individuals not affiliated with the institution would agree that a cost is appropriate on a sponsored research award.

It is important to refer to updates guidelines on allowable costs.

# **OMB Circular A-110 - Administrative Requirements (Applicability: Grants, Cooperative Agreements)**

[http://www.whitehouse.gov/omb/circulars\\_a110/](http://www.whitehouse.gov/omb/circulars_a110/)

## **What It Covers...**

- Definitions, standard forms, etc.
- Standards for financial systems, written policies, cash management, cost-sharing or matching, program income, more forms, etc.
- Required approvals, revision of budget/program plans, expanded authorities (e.g., to issue no-cost extensions, carry forward unobligated balances from year to year, etc.)
- Audit requirements, allowability of costs, period of performance, etc.
- Property standards, intangible property, intellectual property, etc.
- Incorporation of Freedom of Information Act (FOIA)
- Procurement standards, codes of conduct, competition, cost and price analysis, costing of proposals, etc.
- Contract provisions to be included in subawards
- Reporting requirements, record retention, etc.
- Termination, award close out, etc.

## **OMB Circular A-133 - Audits**

(Applicability: Grants, Contracts, Cooperative Agreements)

[http://www.whitehouse.gov/omb/circulars\\_default/](http://www.whitehouse.gov/omb/circulars_default/)

### **What It Covers...**

- Specifies 14 separate compliance requirements, including allowable costs, activities, cash management, equipment, level of effort devoted, programmatic, financial and other reporting, sub-recipient monitoring, etc.
- Prescribes method for determining "Major Programs"
- Specifies sub-recipient monitoring and audit report requirements

## **Federal Acquisition Regulations (FAR)**

(Applicability: Contracts Only)

<http://www.arnet.gov/far/>

### **What it covers...**

- Used on contracts (procurements), rather than on grants, which provide financial assistance
- Part of the Code of Federal Regulations (CFR)
- Incorporates OMB Circular A-21 above for purposes of determining allowable costs

### **Agency Implementing & Supplementing Guidelines**

- Examples include [NSF Grant Policy Manual](#), [NIH Grant Policy Statement](#), [NASA Grant and Cooperative Agreement Handbook](#), etc.

# **AS A DARTMOUTH INVESTIGATOR, WHAT DO I NEED TO KNOW ABOUT ALL OF THESE FEDERAL REGULATIONS?**

## **You should know that...**

- If you submit a proposal to the federal government, any representations made are subject to a possible review and/or audit before or after receiving an award, even if you don't receive an award
- Awards are made to the Trustees of Dartmouth College rather than to individual PIs because sponsors desire to legally bind the organization
- Evaluation of an allowable expense is followed by a determination of this expense as both allocable and reasonable (i.e., will an auditor feel the same way as you do about it in a year or two?).
- You must create a realistic budget with sufficient justification in relation to the scope of your project.
- Costs, such as secretarial/administrative support, time spent on proposal preparation (i.e., grant writing), membership dues, subscriptions, office supplies, postage, telephone line and cell phone charges and the like are not allowable as direct charges to federal awards and should not be included in proposal budgets.
- Proposals involving the use of either human subjects or animals require the approval of your protocol by the Dartmouth IRB or IACUC prior to award receipt and commencement of a study
- Proposals to the National Institutes of Health (NIH) that include use of human subjects require a letter certifying that you, as well as all key personnel listed on the project, have successfully completed an educational program in the use of human subjects.

- The level of effort you are devoting to a project *must* be consistent with what was proposed and approved in your award (this becomes more important if you expect to devote LESS effort than was indicated in your proposal). Specifically, if effort were to drop below 25% of the original obligated effort, prior approval must be obtained by the sponsor. [Contact your OSP SRM.](#)
- Should you decide to rebudget compensations associated with the obligated PI/Key Personnel effort, this will become a cost-sharing issue if the reduction is more than 25%. Your obligated commitment must therefore be tracked.
- Should you increase your effort and wish to be paid for the additional effort, this becomes a rebudgeting issue insofar as there are still adequate funds to complete the project as originally proposed.
- If you travel to a foreign country, you must use a U.S. flag carrier for the cost to be allowable on federal awards; otherwise, the cost of the air portion of the trip may become a personal liability. When making travel arrangements through the College Travel Office, notify the agent that the travel is associated with a sponsored project.
- The title to equipment purchased on federal grants vests in the College, but equipment purchased on federal contracts remains the property of the government unless subsequently transferred to Dartmouth upon request
- Some grants are awarded with expanded authority, so that certain types of actions (e.g., pre-award costs, no-cost extensions, rebudgeting, etc.) can be approved internally by the College, while other actions (e.g., change of PI, change in scope of work, etc.) may need sponsor's prior approval.

**PLEASE REFER TO THE TERMS AND CONDITIONS  
OF EACH AWARD FOR SPECIFIC INFORMATION.**

- The information you need to disclose to an outsider regarding the results of your project is covered by the [Freedom of Information Act](#). Anyone requesting such information may refer to the [specific Freedom of Information Act office](#) at the sponsor that provided the award
- There will be reports and/or other deliverables required under each award. The Terms and Conditions of the award will state what they are, and when they are due.

# **Managing Your Research:**

## **A Principal Investigator Handbook for Sponsored Research**



### **DIVISION SPECIFIC SECTION**

# DARTMOUTH MEDICAL SCHOOL



## **COST-SHARING APPROVALS FOR DMS FACULTY: 12-month appointment**

As described in the core text, cost-sharing may include:

- All faculty/employees compensation covering ANY committed effort that is not being charged to the project.
- any F&A rate deviation

All cost-sharing requests should be approved by the [DMS Chief Financial Officer](#) in advance, with the exception of the basic science departments' rule below.

Before circulating the routing form, please complete the cost-sharing section, as follows:

- salary amount
- fringe benefits amount
- other cost-shared items amount
- GL string(s) covering the above costs
- [F&A \(Facilities and Administrative\) costs](#) calculated from the above base amount

Please send a copy of the routing form and budget pages to the DMS Fiscal Office after all signatures have been collected.

### **EXCEPTION: The following basic science departments support 50% of tenured or tenure-track faculty salary:**

Biochemistry  
Genetics  
Microbiology  
Physiology

When committing a portion of the 50% effort compensated by their department without charging the project, faculty from the above departments should receive approval from their respective department chair. While the proposal does not need to be routed through the DMS fiscal office (unless other costs are involved), the cost-sharing section should be completed on the routing form, and approved by the department chair on the appropriate line, as follows:

- salary amount
- fringe benefits amount
- GL string(s) covering the above costs
- [F&A \(Facilities and Administrative\) costs](#) calculated from the above base amount

If cost-sharing for clinical personnel is mentioned in the project, it should be approved by the Clinic appropriate individual.

Also remember that a multidisciplinary proposal involving other departments across campus may require another school approval. Allocate enough time to obtain all necessary signatures.

**HUMAN SUBJECTS: Cancer Research (Clinical Trials)**

Any research protocol involving cancer and human subjects must be reviewed by the Clinical Cancer Review Committee (CCRC) at Norris Cotton Cancer Center (NCCC). The CCRC must approve the research protocol *before* an application is submitted to the [Committee for the Protection of Human Subjects \(CPHS\)](#). Please note that advanced planning is essential since the CCRC meets only once per month, the second Thursday. Application deadlines are two weeks before the meeting date. Please contact the [NCCC Clinical Research Office](#) for application materials and instructions.

# THAYER SCHOOL OF ENGINEERING



## Thayer School Grant Managers:

Lori Jackson  
Senior Accounting Manager  
646-2954

Tracy Ballou  
Research Grant Manager  
646-0616

Jodi Harrington  
Research Grant Manager  
646-2455

Investigators must complete the [Conflict of Interest Disclosure Form](#) and return it marked “Confidential” to Jill Mortali, Director, Office of Sponsored Projects (Hinman Box 6210).

# TUCK SCHOOL OF BUSINESS



Specific information for Tuck is under development. Please contact Penny Paquette (646-2492) or Bob Hansen (646-2079), Senior Associate Dean, in the interim.

All investigators must complete the [Conflict of Interest Disclosure Form](#) and return it marked “Confidential” to Jill Mortali, Director, Office of Sponsored Projects (Hinman Box 6210).