Managing Your Research:
Office of Sponsored Projects

A Principal Investigator Handbook for Sponsored Research

Office of Sponsored Projects

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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WHERE TO GO FOR ASSISTANCE

The Office of Sponsored Projects (OSP), together with Research Grant Managers (RGMs), and Department Research Administrators (DRAs)* 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 are submitted to OSP.

Some projects may be submitted through The Office of Foundation Relations in the later stages of the application process, 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

(Appendix: OSP Staff Directory)

*Position titles may vary by departments and schools

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Frequently Used Acronyms
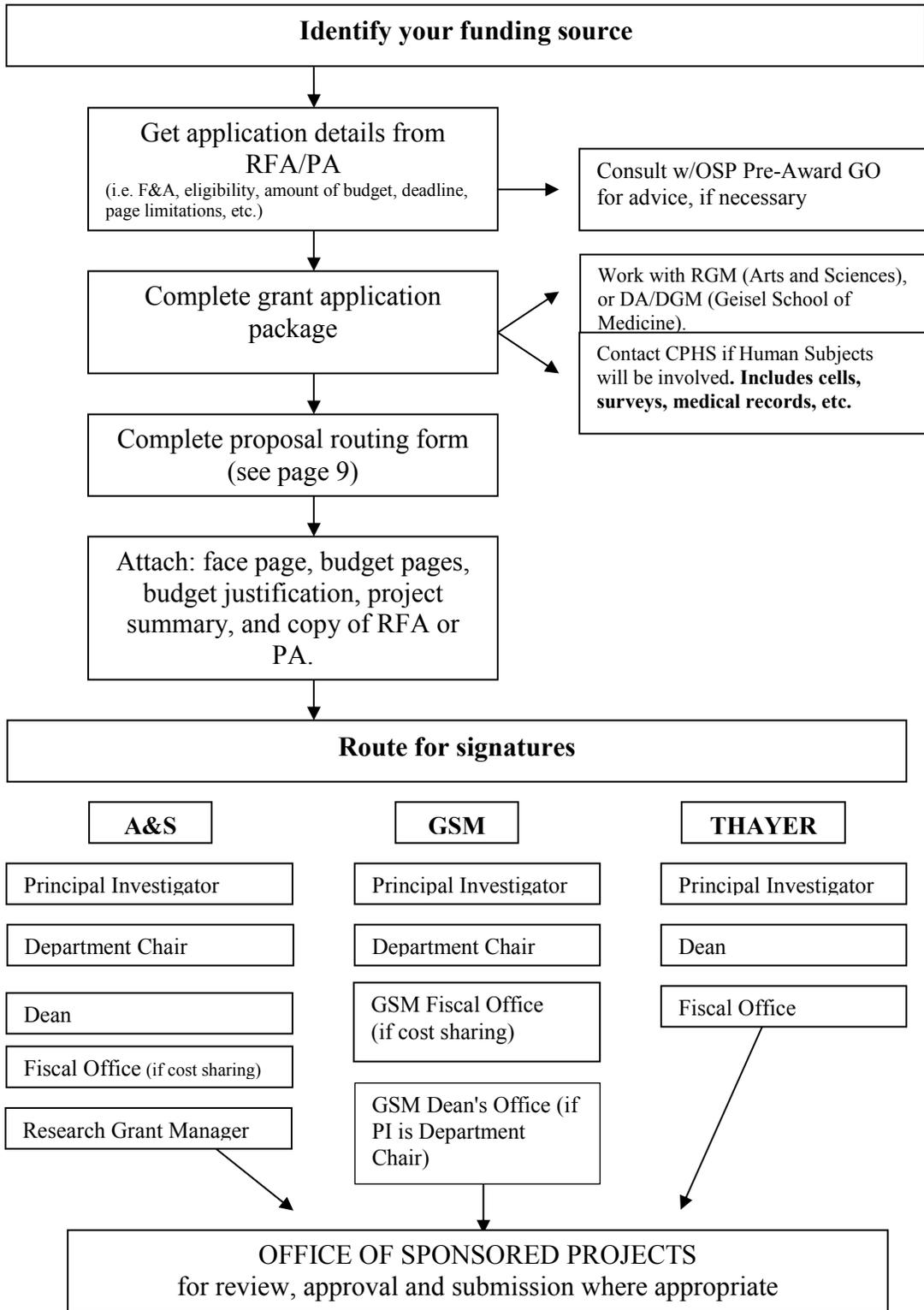
A&S -   Arts & Sciences
CCRC -   Clinical Cancer Review Committee
COEUS -   Grant Management and Tracking System
COI -   Conflict of Interest
CM -   Cash Management
CPHS -   Committee on Protection of Human Subjects
DA -   Department Administrator
DGM -   Department Grant Manager
DRA -   Department Research Administrator
ePRF -   Electronic Proposal Routing Form
FAR -   Federal Acquisitions Regulations
FR -   Financial report
FSR -   Financial Status Report
GL -   General Ledger
GO -   Grants Officer (Pre-Award)
GSM -   Geisel School of Medicine
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, Payroll Authorization
PI -   Principal Investigator (or PD – Project Director)
PTAEO -   **P**roject, **T**ask, **A**ward, **E**xpenditure type, **O**rg: a five-segment account identifier used to track and report sponsored research projects and purchase transactions
RAPPORT -   Research Administration and PI Portal
RFA -   Request For Applications

RFP -   Request for Proposal
RGM -   Research Grant Manager
SOW -   Scope of Work or Statement of Work
SRM -   Sponsored Research Manager (Post-Award)
TTO -   Technology Transfer Office

BEFORE PROPOSALS MAY BE SUBMITTED…

- The following compliance requirements must be addressed and completed prior to submitting a grant from Dartmouth. They are:

    - Invention Agreement
    - Conflict of Interest On-Line Disclosure System (COI)

- Unless the proposal is submitted through RAPPORT (OSP's electronic system), 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 (soon to be RAPPORT), the Sponsored Research database at the College. To add a new user to this database, please send an email to sponsored.projects@dartmouth.edu 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, NIH eCommons, and NSF's Fastlane). In order to access these online sites investigators must be registered. Please send an email to 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

Identify your funding source

↓

Get application details from
RFA/PA
(i.e. F&A, eligibility, amount of budget, deadline,
page limitations, etc.)

→ Consult w/OSP Pre-Award GO
for advice, if necessary

↓

Complete grant application
package

→ Work with RGM (Arts and Sciences),
or DA/DGM (Geisel School of
Medicine).

→ Contact CPHS if Human Subjects
will be involved. **Includes cells,
surveys, medical records, etc.**

↓

Complete proposal routing form
(see page 9)

↓

Attach: face page, budget pages,
budget justification, project
summary, and copy of RFA or
PA.

↓

Route for signatures

A&S	**GSM**	**THAYER**
Principal Investigator	Principal Investigator	Principal Investigator
Department Chair	Department Chair	Dean
Dean	GSM Fiscal Office (if cost sharing)	Fiscal Office
Fiscal Office (if cost sharing)	GSM Dean's Office (if PI is Department Chair)	
Research Grant Manager		

↓

OFFICE OF SPONSORED PROJECTS
for review, approval and submission where appropriate

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 needs
  - Computer
  - Scientific Equipment
  - Machine or Other Shop

Peripheral Commitments

- Departmental Staff and Other Resources

- Research Administration

- Research Accounting

- Any Office/Department services used in connection with award

*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."

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THE SUBMISSION PROCESS

Before Contacting OSP…

☐ Determine if the PI is eligible to submit a proposal. (Appendix: PI Eligibility policy)

☐ Communicate with your Research Grant Manager (RGM) or Department Research Administrator (DRA).

☐ **<u>Review sponsor guidelines</u>**. 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 the current limited opportunities list below along with appropriate guidelines: http://www.dartmouth.edu/~osp/funding/limited_submit.html

☐ Determine the scope of the project (i.e., duration, project personnel, 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

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WHAT TO LOOK FOR…

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

o Limitations to the number of applications per institution or department. See specific guidelines at:
http://www.dartmouth.edu/~osp/funding/limited_submit.html

o Sponsor's eligibility criteria such as restrictions on the applicant's years of experience, position, or years in a position

o Whether PI salary can be included in the budget

o Page limitations and whether appendices may be included

o Restrictions on concurrent applications to other programs or sponsors or overlapping support for proposed project

o Letter of intent or pre-proposal requirement

o Cost-sharing or matching funds requirement

o Restrictions on indirect cost rate

o Restrictions on the participation of foreign nationals

o Publication restrictions

o Requirements of data, resource, or intellectual property sharing

o Export controls: requirements of federal licenses for sharing information or materials abroad

o Equipment purchase restrictions

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The Dartmouth Proposal Routing Form

Currently the Dartmouth Proposal Routing Form is an important tool used by:

- Department chair to gain a sense of the content of the proposal, and any departmental obligations (space, equipment, etc.)

- OSP to track compliance required information, such as COI 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 not submitted through OSP's new electronic system, RAPPORT. The routing form must be provided to OSP at least seven (7) days prior to the sponsor's required submission date.

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

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PI Considerations:
Notification and Required Lead Times

Proposal Submission Deadline Policy
The Proposal Submission Deadline policy is intended to incorporate a sufficient time period to allow for review and submission of all requests for externally funded grants and contracts.   Proposals are reviewed at the Department, School and OSP levels to assure compliance with sponsor requirements, institutional policies and commitments, and all applicable regulations.

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" and all COI requirements addressed

30-90 Days PRIOR to the Deadline

The PI informs Department and OSP of intent to submit.
As soon as the PI decides to submit a proposal s/he should inform the leadership of his/her department or school, the department finance/grant management staff and OSP Pre-Award Grants Officer (GO) of his/her intent. This allows the GO to begin communication with the PI and the RGM/DRA and to plan the flow of the proposal submission.   This prior notification is especially important in the following instances:

- Large, complex programs
- Multi-project programs, involving several 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 previously referenced).
- 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 Submission Deadline (9:00am)

PI / DEPT submits Proposal Review Materials to OSP GO. To begin the review and assist the GO in an orderly and efficient process, the following materials should be provided:

- Signed Routing Form or RAPPORT approved proposal
- 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 GO will inform the PI and RGM/DRA 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 sponsor's required forms including official institutional signature from the GO 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 Submission Deadline (9:00am)

Electronic Submissions: Release of the final proposal to OSP for Submission to the Sponsor
- The PI / DEPT must release the complete proposal to OSP GO by 9:00am two (2) business days PRIOR to the deadline for electronic submission to the sponsor. This allows time for possible technology slowdowns and for the PI / DEPT to make corrections in response to system errors indicated by RAPPORT, Grants.gov or other electronic systems. Proposals are listed in the queue and submitted to the sponsor as soon as possible.
- The PI / DEPT is responsible for monitoring successful submission of the proposal as it moves through the sponsor's electronic system. <u>If there are errors requiring correction, the PI / DEPT makes the necessary corrections and contacts OSP to resubmit</u>.

Late Submission to Internal Deadlines

In rare circumstances a justified waiver request to the OSP Director is required prior to the internal deadline for any delay in providing the final application. If proposal materials do not reach OSP by the internal deadlines the proposal is considered *late*. The proposal is added to the queue. **The PI assumes the risk that errors may occur during the electronic submission and that the final sponsor submission deadline may be missed.**

Things to consider prior to submitting a proposal

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?

☐ 8.   Have all key personnel (including consultants when appropriate) completed the COI requirements (COI guidelines and system)?

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 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 (SOW), and budgets with justifications in hand?

3.   Is a letter of support included from 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 have prior written approval by all appropriate authorities.

6.   Will there be the use of animals or humans in the project? If so, the IACUC (Institutional Animal Care and Use Committee) or IRB (Institutional Review Board) will need to review and approve the protocol prior to the start of the project.

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 (TTO))
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. If PI, Co-PI, or Key Personnel are not requesting salary, has it been discussed with the OSP GO or the DRA/RGM whether or not cost-sharing is required?
13. 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?
14. 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 (i.e., user ID, password) and knowledge/training to use the sponsor's particular electronic proposal system (i.e, RAPPORT, NSF FastLane, NIH Commons, 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?

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OSP Proposal Preparation Resources
Contact Email: Sponsored.Projects@Dartmouth.edu

- Identification of funding opportunities and interpretation of sponsor requirements, including the access to Pivot-COS

- Assistance registering with sponsors' electronic systems when necessary

- Assistance preparing required forms (such as assurances, certifications, etc.)

- Liaison activities with sponsor administrative contacts

- Providing important updates through on-campus bulletins, OSP website and OSP Blog

- Distribution of weekly NIH Funding Opportunities and Notices and NSF Updates

- Departmental and special interest group workshops

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The Conflict of Interest Disclosure

Dartmouth College has an institutional policy in compliance with federal requirements which it applies to all sponsored projects (COI policy). 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: A proposal cannot be processed by the Office of Sponsored Projects without appropriate COI requirements completed.

These requirements are described in Title 42, Code of Federal Regulations, Part 50, Subpart F, Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought that was published on August 25, 2011 in the Federal Register. Institutions were required to be in compliance with the regulatory requirements no later than August 24, 2012.

The FCOI regulations were revised to increase accountability, add transparency, enhance regulatory compliance and effective Institutional management of Investigators' FCOIs, and strengthen NIH's compliance oversight. The 2011 revised regulation includes comprehensive changes, focusing on these areas in particular:
- Definition of Significant Financial Interest
- Extent of Investigators' disclosure of information to Institutions regarding their Significant Financial Interests;
- Institutions' management of identified FCOIs
- Information reported to the PHS funding component (e.g., NIH);
- Information made accessible to the public (i.e., Institutional FCOI policy and identified FCOIs of senior/key personnel); and
- Investigator training.

Currently, all institutions applying for or receiving NIH funding, as described in the revised regulation, must have compliant policies to include the comprehensive changes noted above.

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COST TYPES
DIRECT AND INDIRECT

DIRECT COSTS

Direct costs are defined by the federal government in OMB 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, Wages & Fringe Benefits

Starting with the PI , list the names and positions of all "key" personnel.[1] 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.

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[1] 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."

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](#))

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

This category is 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 and animal costs. 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.

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****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 detailed 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**.   Please refer to the sponsor guidelines and/or templates.

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.

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 Sponsored Research Manager (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.

For more information, please go to the following URL:
http://www.dartmouth.edu/~osp/resources/manual/post-award/costshare.html

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OBTAINING COST-SHARING APPROVAL AT DARTMOUTH

Contact the OSP Grants Officer (GO) to discuss sponsor requirements (programmatically-required cost-sharing levels, budget caps, etc.) and any other cost-sharing items (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 <u>mandatory</u> 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 the OSP GO.

Please refer to the "Sponsored Research" chapter of the Arts & Sciences Faculty Handbook and the OSP website for institutional policies governing some of these negotiation points.

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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 IRB and 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 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 <u>awards are received</u>, the following steps are taken:

- OSP GO reviews award terms and conditions to ensure they are appropriate for the College.

- OSP GO checks that all compliance requirements have been addressed: IRB or IACUC protocol, COI disclosure, etc…..

- OSP GO reviews the amount of effort proposed and awarded and the indirects to ensure they are in compliance with current policy.

- OSP GO then transmits the NOA to the DRA/DGM/RGM, OSP SRM, and the PI.

- OSP SRM assigns an OGA number (PTAEO 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.

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Advance Account/Pre-Award Spending:

<u>Prior to Notice of Award:</u>

A PTAEO 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 <u>OSP SRM</u> 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.

<u>Click here to access the Advance Account Request form</u> for requesting advance accounts and/or pre-award costs.

POST-AWARD REQUIREMENTS

The PI, as Project Manager, has four 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
- Submitting timely reports

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 DA/DGM/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 DRA/DGM/RGM. Below are the typical characteristics that apply to the various types of reporting requirements:

Programmatic Reporting and/or Other Deliverables

- 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.

- Completion is the responsibility of the PI, or in the absence of the PI, the Key Personnel.

- 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..

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Financial Reporting

- It is the responsibility of the DRA/DGM/RGM to submit the final reconciled directs, plus any backup documentation, to the OSP SRM.

- The SRMs and Grant Accountants have the primary responsibility for completion and submission of all invoices and financial reports (FRs).

- 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 the OSP SRM. 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.

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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 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 DA/DGM/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 DA/DGM/RGM, prepare and submit the required internal request form and send the request to the OSP SRM via e-mail.
- Determine if cost-sharing requirements have been met.

At budget/project end date:
- Review all charges, including salary and fringe benefits.

Within 60 days after budget/project end date:

- Ensure subaward recipients have met goals.
- Notify the OSP SRM if subaward is subject to de-obligation.
- 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 (FR's) are prepared and submitted by Post Award of OSP.

Within 90 days after budget/project end date:
- Contact the 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.

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

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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#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 updated guidelines on allowable costs.

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

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)

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.

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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 institution.

- 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 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. There can be no change in SOW without prior approval from the sponsor.

- 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 Travel Leaders 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 and prior approval.

- 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 SOW, etc.) may require the sponsor's prior approval.

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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

GEISEL SCHOOL OF MEDICINE

COST-SHARING APPROVALS FOR GSM 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 [GSM Chief Financial Officer](#) in advance, with the exception of the basic science departments' rule below.

Before circulating the routing form or forwarding the RAPPORT application for approval, 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 /Indirect costs](#) calculated from the above base amount

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 GSM 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 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.