

# Grants, Research and Sponsored Programs

## Handbook Part II:

### Award Management Guide



The Office of Grants, Research and Sponsored Programs

Slippery Rock University

August 30, 2023

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This handbook is designed for sponsored project's Principal Investigator/Project Director, administrative staff and Grant Accountant. The roles and responsibilities of these parties during the management of this award are described within this handbook. While not exhaustive, this handbook describes the best practices for managing a sponsored project, related policies and points of contact to assist you along the lifecycle of your award.

All cited policies and forms, notated in ***bold italics***, throughout this handbook can be found on the [Policies and Forms](#) webpage of the GRASP website.

As always, the staff of the Grants, Research and Sponsored Programs Office is happy to provide assistance, so please feel free to contact us for additional guidance!

## **1 THE OFFICE OF GRANTS, RESEARCH AND SPONSORED PROGRAMS**

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The Office of Grants, Research and Sponsored Programs (GRASP) assists faculty and staff in the pursuit and management of external funding. This handbook will guide you through the “post-award” stages of the sponsored programs lifecycle which begins with the notice of award from a sponsor, includes the management of the award at Slippery Rock University (SRU) and ends with the closeout of the award with the sponsor and internally.

The GRASP Office is responsible for ensuring compliance with Federal regulations and laws, sponsor-specific guidelines and the policies and procedures of SRU. We will collaborate with you and other campus partners such as the Slippery Rock University Foundation Inc. and the Grant Accountant to provide the resources needed to manage your award.

The GRASP Office provides support and assistance with:

- Negotiation and acceptance of new awards;
- Requesting a new financial account for the external funds to be tracked;
- Orienting the PI/PD with the award's terms and conditions and related SRU policies and procedures;
- Facilitating requests and communication with the sponsor, as needed;
- Providing guidance regarding compliance with your award throughout its life; and
- Reviewing sponsor-required reports prior to submission.

All new award agreements, amendments, contracts or subcontracts with an external entity require approval from our institution's authorized organizational representative (AOR). At SRU, this authority is delegated to the President and the review process is coordinated by the GRASP Office.

### **1.1 GRASP CONTACTS**

Casey Hyatt, Director, [casey.hyatt@sru.edu](mailto:casey.hyatt@sru.edu), 724-738-2045

#### **1.1.1 Sponsored Projects Grants Accountant**

Sarah Filges, Grant Accountant, [sarah.filges@sru.edu](mailto:sarah.filges@sru.edu), 724-738-2236

## **1.2 POST-AWARD LEARNING OPPORTUNITIES**

When a new award is received, the GRASP Director and the Grant Accountant will meet with the Principal Investigator/Project Director (PI/PD) to review the award's terms, conditions, reporting requirements and budget. Beyond this meeting, the GRASP Office also provides:

- **Individual Trainings**
  - The GRASP Office is happy to sit-down with the PI/PD and/or staff individually to review particular areas of concern or the specifics of a sponsored project. Please contact the GRASP Office to schedule a 1-on-1 meeting based on your needs.

## **2 SPONSORED PROJECT OVERVIEW**

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The PI/PD is ultimately responsible for oversight of all “post-award” activities. Post-award activities include carrying out the project as proposed, the spending and tracking of funds in accordance with SRU's policies and sponsor requirements, and meeting all reporting requirements. The PI/PD will work closely with the GRASP Office and/or the Grant Accountant.

Should you have any questions regarding your award, please contact the GRASP Office for a consultation.

### **2.1 Terms & Conditions of Award**

Once an award is received, the PI/PD needs to carefully review the complete award agreement or contract, including award attachments and adhere to all terms and conditions. The GRASP Office assists in communicating with SRU University Legal Counsel and the sponsor, should any provisions need interpretation. The PI/PD is responsible for carrying out the project in compliance with all sponsor terms and conditions, Federal, state and local laws, and SRU policy.

### **2.2 Signature Authority**

All sponsored project agreements and contracts must be reviewed by the GRASP Office and signed by SRU's authorized organizational representative (AOR). At SRU the AOR is the President, or their delegate. No agreement, amendment, subcontract, consulting contract, report, or any other document requiring institutional authorization under a sponsored project is considered executed unless the AOR has reviewed and signed. The GRASP Office will facilitate the AOR approval process for all sponsored project-related agreements.

### **2.3 Personnel**

Sponsored projects may employ SRU faculty, staff, students, temporary employees, consultants/independent contractors, or grad students. Personnel appointments will be listed in the proposal budget and approved by the sponsor at the time of the award. Should circumstances in personnel change, please work with the GRASP Office to request a prior approval from the sponsor.

### **2.4 Independent Contractor Agreements**

If the appointment of an independent contractor or consultant is necessary within your sponsored project, please contact the GRASP Office. The GRASP Office must review the scope of work, duration of

their commitment and budget to determine if it requires an agreement and ensure that the relationship does not constitute a subaward.

## **2.5 Subawards**

When a subaward is included in a proposal and approved by the sponsor, the GRASP Office will issue the subcontract with the subawardee institution. For Federally funded subawards, the GRASP Director will conduct a risk assessment, prior to executing subaward and set-up a subrecipient monitoring plan for each subaward, if necessary.

The PI/PD will be responsible for receiving subawardee invoices. The PI must review and ensure that the assigned deliverables were satisfactorily met before the invoices are submitted to the Grant Accountant for direct pay.

## **2.6 Prior Approvals**

SRU's policy is that all costs proposed or incurred on a sponsored project complies with the approved scope of work and budget, general sponsor terms and conditions and University policies and procedures. The PI/PD of a sponsored project is required to report major deviations such as, budget revisions, changes to personnel, or to request a no-cost extension regardless of funder. The PI will work with the GRASP Office to request prior approvals.

## **2.7 Reporting Requirements & Procedure**

The PI/PD is responsible for submitting accurate and timely reports to the sponsor. The GRASP Office offers notification and review support while the Grant Accountant will prepare the financial report.

As PI/PD, you are responsible for submitting all interim and final performance and technical reports to the funding agency. Accounting Services prepares all financial reports; if you or your department prepares a financial report, Accounting Services must approve it before it can be submitted. It is important to realize that because some grants and contracts are awarded on a cost reimbursement basis, which means that the university "loans" the money to the project and later asks the sponsor for reimbursement, the issuance of reimbursement to SRU can be hindered if reports are not submitted in a timely fashion.

**Programmatic Reporting.** The PI/PD is responsible for completing any reports required by the sponsor. The GRASP Office will send report reminders to your SRU email. These notifications will remind you of upcoming reports before the sponsor due date. If you need additional time to plan for the report, please plan accordingly. The GRASP Office requests to receive a copy of the report five (5) business days prior to the sponsor's due date to review for sponsor compliance.

**Financial Reporting.** All official financial reports must be reviewed and approved by the Grant Accountant prior to submission. If the report requires an institutional signature, the GRASP Office will facilitate this through the President's Office. Although you may be internally tracking the budget, the financial reports submitted need to be the university's official records which can be only provided by Accounting Services. This is especially important as all financial reports must accurately reflect the final expenditures and align with any invoices that may have been sent to the sponsor by the Grant Accountant.

## 2.8 Grant Close-Out

The grant close-out process is initiated when the funding agency determines that all required work associated with the award is complete. If an awardee does not seek/receive supplemental funding or a no-cost extension by the completion date, the grant will be closed-out.

Approximately 100 days prior to the completion date of the grant, the GRASP Office Director and the Grant Accountant will meet with the PI/PD to discuss what is needed to close-out the grant, if necessary.

## 3 BUDGET MANAGEMENT

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The PI/PD will track the sponsored project (and cost share, if applicable) expenses and budget. The individual in charge of tracking the budget will document award expenses on an ongoing basis and will reconcile their records with the official financial records of the university.

- The GRASP Director and/or the Grant Accountant are available to meet with the PI/PD to help set up a tracking spreadsheet and process.
- At the end of the grant, the PI/PD must reconcile their report with the Grant Accountant and resolve any discrepancies.

### 3.1 Cost Center Number

When a new sponsored project award is received, the GRASP Office will request a new cost center number from the Grant Accountant. The cost center number is the unique accounting code assigned to your project to correctly charge the award and deposit award income.

### 3.2 Cost Share

Cost sharing is any project cost that is not reimbursed by the sponsor to support the scope of work defined by the sponsored award. Cost sharing, also known as “matching funds” or “In-kind support,” is funded by SRU or a third-party, which is generally a non-federal resource.

Types of cost share:

1. ***In-Kind contributions*** – those wherein a value of the contribution can be readily determined, verified and justified, but where no actual cash is transacted in securing the goods or services comprising the contribution. Examples: external volunteer time, non-institution space which would normally carry a fee (rent).
2. ***Cash contribution*** – when an actual cash transaction occurs and can be documented in the accounting system. Examples: faculty and staff time, purchased supplies or travel, etc.
3. ***Mandatory committed*** – when the sponsor requires cost share be included in the proposed project budget. This may be mandated in the form of a percentage, match ration, or actual dollars.
4. ***Voluntary committed*** – cost share that is not mandated by the sponsor, but included in the proposal and/or budget. When included, it must be documented and verified by the department, and reported to the sponsor.

Cost-share requirements are determined in the proposal stage and the source of funding must be listed on the Transmittal Form for External Proposals by the proposer's department or college/division with approval from their chair and dean/director, and verified by the Grant Accountant prior to submission. SRU strongly discourages cost sharing, unless such a commitment is required by the sponsor. All committed cost sharing must be tracked and requires reporting to the sponsor.

If included in a proposal and subsequent award, cost-share will be held to the same standards as the sponsor funded award in regards to personnel, purchasing, prior approvals, tracking, reporting and spending down.

### **3.3 Spending the Funds**

#### **3.3.1 Facilities and Administrative Costs (Overhead or Indirect Costs)**

Facilities and Administrative (F&A) costs, also called indirect or overhead costs, are recognized by many sponsors as the grantee's "cost of doing business" beyond the funded budget categories. For example, while the university incurs a real expense by keeping the lights on in a laboratory or office where the project is conducted, it would be virtually impossible to calculate and budget for the exact amount required for the sponsored project. Hence, an F&A rate is typically allowed – usually as a percentage of salaries and wages, or as a percentage of the total direct costs. If F&A costs were part of your approved budget, they are calculated annually at the approved rate, based on your actual expenditures against your grant or contract. The total F&A costs generated by your account will not exceed the figure on your approved budget. A portion of the F&A costs are returned to the project director's department and individual discretionary accounts and are distributed at the close out of the project budget or at the end of the fiscal year.

The policy for the distribution of F&A costs is as follows:

- Project director (20%) – to be used by the PI/PD for research-related or program-related costs, such as expenses related to the funded project for costs that are not covered by the grant, seed money for research projects and/or sponsored programs under consideration, supplies and travel for other research projects, and/or professional development.
- Department of the project director (10%) – to be used by the department chair to promote research projects and/or sponsored programs within the department, i.e., faculty/student research projects, travel costs to present papers/abstracts at conferences and seminars, matching funds for grant proposals, faculty professional development, etc.
- Dean of the College, Associate Provost or Vice President of the project director (10%) – to be used by the dean, associate provost or vice president to promote research projects and/or sponsored programs within the college/division, i.e., faculty/student research projects, travel costs to present papers/abstracts at conferences and seminars, matching funds for grant proposals, faculty/staff professional development, etc.
- Office of Grants, Research & Sponsored Programs (30%) – to be managed by the Director to promote the pursuit of external grants: sponsoring faculty/staff travel (to attend technical assistance writing workshops and/or meet with program directors of funding agencies for discussion of projects); workshops and training sessions for faculty/staff (such as basic grant writing, compliance/regulations issues, budgeting, etc.); professional development for The GRASP Office staff; and, increase services within the GRASP Office.



- General (30%) – to be retained by the university for the cost of doing research and sponsored projects (i.e., utilities, renovation of facilities to support research, etc.).

### 3.3.2 Budget Line-Item Transfers

The extent to which a budget may be modified once an award has been accepted varies from agency to agency. **Contact the GRASP Office prior to deviating from the budget.**

### 3.3.3 Hiring Personnel

SRU supports equal opportunity and affirmative action principles, practices, and programs. SRU recruits, hires, and promotes qualified persons in all job classifications without regard to race, color, religion, sex, national origin, age, political affiliation, marital status, sexual orientation or disability. In addition, SRU administers all matters affecting employees including salaries, benefits, university-sponsored training and education and social and recreational programs on the same basis of non-discrimination.

If your grant includes funding for hiring purposes, you must follow established university recruitment and hiring policies and procedures. The staff of the Human Resources Office is available to assist you in this area by answering questions, providing forms, and advising you on the best way to hire individuals in accordance with your budget. While conducting a full affirmative action search will be required, recruitment efforts may vary depending upon the type and level of position. Because hiring can take several months, plan to begin this process as soon as possible.

Remember that the proposal budget may have been based on estimates of salary and fringe benefits, but the cost center will be charged the actual amount. If this is less than what was included in the proposal, there is no problem. If it is more, then provisions must be made to prevent a deficit in the account.

There are several types of positions and appointments at SRU, and different offices are involved in making them. Contact the GRASP Office to determine the most appropriate course of action to ensure the project hires are done in compliance with SRU, Federal and state regulations.

Project Directors on grants are responsible for arranging the appointment of faculty to externally funded positions. The academic department of the project director initiates the paperwork, in most cases, that often requires the approval of the Dean's and Provost Offices. Project Directors must follow the policies of the Human Resources Office who, in turn, are governed by the APSCUF (collective bargaining unit) guidelines for hiring faculty. Keep in mind that the faculty collective bargaining agreements sets release time compensation rates and summer compensation is based on academic annual hourly rate and faculty cannot be paid more than what the collective bargaining agreement allows. All additional compensation must comply with the PASSHE Compensation Policy for Sponsored Activities. **Time logs must be submitted to Payroll, the GRASP Office and Grants Accounting for work done on a grant.**

**Types of Faculty Appointments:**

- Dual Employment – this assignment shall not interfere with the employee’s primary job duties. In order to be paid, this additional work must clearly be outside the employee’s normal duties and responsibilities. In most cases, payment will be made following completion of work. The dual employment form must be completed and signed before the work has begun. Fringe benefits must be paid from the grant unless the University committed to cost share in the grant proposal.
- Release Time/Alternate Workload Assignment – releasing faculty from academic year duties in order to devote time to an externally funded project usually involves two steps: (1) releasing the faculty member from teaching through Alternate Workload Equivalency; and (2) hiring a faculty replacement to assume those academic assignments for a designated period. The process for hiring faculty replacements is the same as for hiring temporary faculty, although some departments may choose not to hire faculty replacements.
- Summer Employment – hiring faculty on summer contracts is often included in externally funded projects. Note that one credit hour of work = one week of pay, and that total summer contract employment cannot exceed 12 credit hours, including all work done in the summer, not just grant work. If work will be completed after graduation, a summer contract must be submitted.

If your grant includes funding for supplemental pays for staff members such as overtime, contact Human Resources to discuss the proper procedure to document and request payment for this additional work.

The following table outlines some of the key elements project directors must know in order to be compensated on grant funded projects:

<b>Type of Appointment:</b>	<b>Forms Required:</b>	<b>Signatures Required:</b>	<b>Other Reviews:</b>
Dual Employment	Dual Employment Form – found on Human Resources Webpage	Department Chair College Dean Human Resources	Human Resources will send to Provost/President then to Payroll
Release Time/Alternate Workload Assignment	N/A	Department Chair College Dean	
Summer Employment (must be completed prior to April 15 <sup>th</sup> of each year – if awarded after that date, contact the GRASP Office)	Summer Contract	Grant Accounting will send information to the Interim Associate Provost for Academic Finance, Planning and Strategic Initiatives according to your grant agreement, who will then send the information to Payroll	Information will then go to your Dean and their Administrative Assistant

Benefits (e.g., F.I.C.A., retirement, health insurance, etc.) will be charged to your account for those paid from the grant funds. Benefits are charged to the grant account at a rate established for the individual employee. Temporary staff positions (such as clerical) are not eligible for health care coverage; however, mandatory deductions, such as F.I.C.A., will be charged to the grant account. Consult Accounting Services if you have questions regarding fringe benefit charges to your account.

The Human Resources Office will schedule an appointment with newly-hired individuals so that appropriate paperwork can be completed. This will include the Employment Eligibility Verification Form (I-9) which must be completed by all new hires no later than three days after the commencement of work. Once an individual begins working, wages must be paid in a timely manner in accordance with SRU's payroll schedule. Individuals may not begin to work without having a specific source of funds to cover their wages. The initial source may be temporary and payroll changes can be made at a later time.

Graduate assistants are hired through the [Payroll Office](#). The student must meet all department academic requirements and comply with all rules that govern assistantship appointments at SRU. Compensation for graduate assistants is based on the university's graduate assistantship policy. It is possible to hire graduate students on an hourly basis through [Student Payroll](#). Contact the GRASP Office for advice concerning the best way to hire graduate assistants in accord with your budget.

#### **3.3.4 Internal Consultants**

Consultation from current SRU faculty or staff is usually considered to be a courtesy and does not include financial compensation. In extremely rare cases, however, SRU faculty may receive supplemental pay provided that the consultation is across departmental lines or involves a remote or separate operation, and that the work is in addition to the regular departmental workload. Consultation expenses should be listed in the budget at the time of proposal submission. **Arrangements must be made before the work is performed.** If a faculty member puts extensive time into a project, that person's salary should be listed on the budget rather than being paid as a consultant. Payments to SRU faculty or staff will entail mandatory benefit contributions borne by the grant.

#### **3.3.5 External Consultants**

The GRASP Office can assist with the process of hiring both on- and off-campus consultants. Consultants from off-campus must be approved as independent contractors and are paid using a Service Purchase Contract entered through SourcePoint via a non-catalog purchase requisition in Guided Buying. University policy on the payment of consultant fees presumes the following standards for documentation in support of the use of consultant services. The services to be performed are essential and cannot be provided by persons receiving salary support under the grant or project. A selection process has been employed to secure the most qualified individual available, considering the nature and extent of the required services. The payment is appropriate considering the qualifications of the consultant, his or her normal fees, and the nature of the services to be provided.

A contract exists whenever a Commonwealth agency enters into an arrangement with another party, including consultants, under which there are obligations or exchanges of consideration. Arrangements, such as affiliation agreements, might or might not require the university to pay money or receive money, but are still considered contracts. With limited exceptions, University Legal Counsel is required by the Commonwealth Attorneys Act to review and approve contracts and agreements entered into by the Pennsylvania State System of Higher Education (PASSHE).

Legal review and approval is required for any contract between the university and another party unless the contracts are less than \$1,500. Contracts for \$1,500 or more are submitted to the Office of University Legal Counsel for review and signature. It is the policy of the Office of University Legal Counsel to sign and forward or return contracts within two business days. Once signed by University Legal Counsel, contracts are generally forwarded for review to the Office of the Attorney General. The Office of Attorney General may take up to thirty days to approve or reject a contract.

Consultant contracts in excess of \$5,000 require Chancellor's Office and/or Board of Governors approval. Such contracts are also subject to special processing. Contracts less than \$5,000 follow the same review and approval procedure as standard contracts.

University Legal Counsel will review the contract and forward it, when necessary, to the Vice Chancellor for Finance and Administration. The Vice Chancellor has approval authority for contracts between \$5,000 and \$75,000. Consultation contracts in excess of \$75,000 must seek approval from the Board of Governors.

Pursuant to Act 57 (the New Procurement Code), no contract shall be effective until executed by all necessary Commonwealth officials as provided by law. Therefore, the PI/PD should allow sufficient time to process a contract for a consultant.

### **3.3.6 Student Workers**

Students who will be paid hourly, whether graduate or undergraduate, are hired through Student Payroll. All necessary work forms, available in the Payroll Office, must be filled out before a student can begin work. A student's hourly wage is determined by the current hourly rate unless otherwise approved. The university restricts the number of hours students can work to 20 hours per week during the academic year. Students may work more hours per week in the summer and during breaks when classes are not in session. Student wages during the summer are subject to F.I.C.A., which will be charged to the grant account.

### **3.3.7 Honoraria and Travel Reimbursement for Non-Employees**

Honoraria are used to pay non-employees for speaking at workshops and for non-employee travel expenses. Persons paid in this way are not eligible for benefits and none will be charged to your account. SRU employees cannot be paid through an honorarium request. Request for these services should be submitted via a non-catalog purchase requisition through SourcePoint.

When requesting this type of service, the payee will need to be registered on the Ariba Network and within SourcePoint.

### 3.3.8 Employee Travel and Entertainment Expenses

The [University's Travel and Business Expenses Policy](#) applies to all faculty, staff and students who incur expenses while engaged in university business or related travel and who intend to receive reimbursement from the university. The policy establishes responsibilities and guidelines for ensuring that travel and business expenses are valid, necessary, in compliance with university accounting procedures, and the most economical means. It pertains to travel and business expenses for all sources of university funds, including grant funds.

The university travel policy applies to travel supported by grants and contracts. You may request financial support for travel expenses if they are reasonable and necessary expenses incurred in connection with the business of your grant. Reimbursement is limited to actual business expenses based upon current university policies unless there is a maximum allowance for a specific expense or there is a reimbursement limit established by the department covering the expense(s). When travel is funded by a grant or contract, the use of the travel funds will be governed by the more restrictive of either the grant, contract, or university policies. You may not charge travel to your grant account unless it is an approved budget item.

Eligible expenses resulting from travel to conferences, professional meetings, training sessions, or workshops include meals, lodging, conference fees, parking, tolls, taxi, bus, limousine, plane, train, or bus. Vehicle travel will be reimbursed at the most economical means based on the university calculator as per the [University Travel Policy](#). Reimbursement requests for entertainment or business meal expenditures are to be documented with individuals present, business affiliation(s), purpose, and the date and place of the event. Receipts are required for this reimbursement. Alcohol and tips are not allowable expenses.

To use the Travel Module to submit travel requests and expense reports through Employee Self Service (ESS), use the documents and videos on the [Accounts Payable](#) webpage under Travel Module Training Materials as guides. The Travel Module is for employees only, no student travel is submitted through the Travel Module. You can also access the [Quick Guide](#) or the [Travel Management Manual](#).

Not all expenses are allowable and there are restrictions on some expenses. You will need dates/times of travel; projected expenses (airfare, conference fees, parking, etc.); grant cost center number for expenses to prepare your Travel Request. Meals are processed at a per diem rate according to the PASSHE Travel Policy. Upload all receipts other than meals and attach them to the Travel Expense Voucher.

After your travel, you will need to create your expense report with exact amounts and upload receipts, report mileage, and specify meal details. You will need actual dates/times of travel; receipts for all expenses being claimed; and per diem will be calculated for you, but you will need to know if any meals were included in the trip and deduct those meals in the per diem field. Your expense report will pre-populated with information from your travel request. If your actual expenses are equal to or less than your request when you submit your report, it will go directly to Accounts Payable for payment.

International travel has additional restrictions. All international travel must be pre-approved by your Vice President and the President at least one month prior to departure. Additionally,

international travel must be an allowable expense by the funding agency. International travel may also be subject to Export Control regulations. (See Export Control compliance on page 17.)

University employees who expect to travel on behalf of the university are eligible to apply for a corporate travel card. The corporate card may be used to pay for meal expenses, air travel, lodging, and other travel and entertainment related expenses. However, employees are liable for any expenses placed on the corporate travel card and are responsible for making payment directly to the credit card company. Contact Accounts Payable for more information on obtaining a corporate travel card.

Accounts Payable can also answer questions concerning travel in general and entertainment/business meal policies, expense documentation, or reimbursement procedures.

### **3.3.9 Liability**

The university and all persons acting within the scope of their duties or while performing services on behalf of or under the direction of the university are protected by the university's comprehensive general liability policy. Coverage provides for the payment of costs (including defense costs) for which there may be a liability for bodily injury, personal injury (libel, slander, or defamation of character) or property damage arising out of the operations of the university.

In order to minimize risk of liability, every project director is responsible for assuring that all personnel involved with the project have been informed of and abide by the controlling policies, procedures, and guidelines for insuring safety and prudent practice.

SRU is a part of the Pennsylvania State System of Higher Education (PASSHE), a body of corporate and politic constituting of a public corporation and government entity. As such, it lacks the statutory authority to purchase insurance and it does not possess insurance documentation per se (i.e. certificates of insurance). Instead, it participates in the Commonwealth's Tort Claims Self-Insurance Program administered by the Bureau of Risk Management of the Pennsylvania Department of General Services. The program covers Commonwealth/University-owned property, employees and officials acting within the scope of their employment, and claims arising out of the University's performance under this agreement, subject to provisions of the Tort Claims Act, 42 Pa.C.S.A. §8521, et seq. The Commonwealth's self-insurance program is outlined the Governor's Office Management Directive 630.2, as amended. A copy of that Management Directive will be provided on request.

### **3.3.10 Insurance on Vehicles**

Please note that SRU holds a national agreement with Enterprise and, therefore, all rentals should be made through them. Vehicle rental through Enterprise includes all necessary coverage. If it becomes necessary to rent a vehicle through other means, you may obtain physical damage coverage in one of the following ways: (1) by reserving and paying the car rental charge with the SRU corporate card; (2) by use of other credit cards offering a car rental insurance coverage

option; or, (3) by purchasing car rental loss and damage coverage directly through the car rental agency.

### 3.3.11 Purchasing

All purchases must follow the SRU policies and procedures for purchasing and require the pre-approval by the PI/PD, department chair, dean/vice president, and Accounting Services prior to the purchase of a good, service or equipment. Catalog purchases within SourcePoint provide a one-stop shop with access to PASSHE-negotiated prices and products from multiple vendors. When the item you are shopping for is not available in a catalog, you should use the non-catalog request option. SourcePoint will guide you through the process of creating a purchase requisition (PR) for an item or service. For goods, services and materials, you should have a quote or a proposal. If you need to make a purchase over the bid threshold, need assistance in finding a particular service or commodity, sole source request or create an emergency contract or procurement, you will need to initiate a Sourcing Request. A sourcing request is initiated by emailing your Procurement Office or Procurement Shared Services Liaison ([Training Guide](#)). **Anyone who makes purchase commitments on behalf of the university without prior approval is acting outside of their employment and will be held personally responsible for any legal or financial obligations arising from or related to the purchase.**

### 3.3.12 Purchases Procured with Federal Funds

In accordance with the Office of Management and Budget guidelines, the University must follow five methods of procurement to be followed by non-Federal entities for micro-, small-, and over-threshold purchases as listed in [§200.320](#) of the [Code of Federal Regulations](#) (CRF). All methods of procurement must comply with [§200.318](#), General Procurement Standards of the CRF. Furthermore, all purchases must comply with the State System's documented procedures as per the [Commonwealth Procurement Code](#) including conflicts of interest standards. Purchases must be necessary and must be made by means of open competition (to the extent required by each method listed herein). All purchases must include proper documentation pertaining to one of the following applicable procurement methods.

- **Micro-purchases** - For purchases less than \$10,000 – Micro-purchases require fewer terms and conditions, have a lesser competition standard than purchases over the threshold, can be solicited informally, and do not require a cost or price analysis. Purchase Orders may be issued without soliciting competitive quotations if the cost is considered to be fair and reasonable. To the extent practicable, distribution of micro-purchases should be made equitably among qualified suppliers. Splitting procurements to avoid competition is prohibited.
- **Small Purchases** - For purchases \$10,001 to \$250,000 – Quotations **must** be obtained from an adequate number of qualified sources. Use discretion when determining the adequate number of qualified sources and methods of obtaining quotations. Quotations may be obtained in writing or orally from a supplier, or via the internet. Quotations do not require a cost or price analysis.

- **Sealed-Bid Purchases – Simplified Acquisition Threshold (\$250,000)** – The competitive-proposal procurement method is used when there are critical factors to consider beyond just price. Follow the Request for Proposals (RFP) procedures.
- **Noncompetitive purchases** – Special circumstances must be present and applicable for noncompetitive purchases. Follow the Sole Source Certification Procedures.

It should be noted that most federal agencies disallow the purchase of equipment in the last 6 months of a project. Anticipate your needs and begin the purchasing process early in the project period.

### **3.3.13 Property Use, Management, and Disposal of Equipment**

Generally, equipment purchased with federal or state grants may be used by SRU faculty, staff, or students for projects associated with the university as long as needed, regardless of whether the project continues to be federally or state funded. If the equipment is no longer needed for the original project, it may be used in other activities currently or previously supported by federal or state funds. In some cases, however, title in equipment purchased with grant funds may rest with the sponsor; in such a case the equipment must be returned to sponsor upon conclusion of the funded project. Note also that equipment purchased by federal or state grants may not be used to provide services for a fee allowing unfair competition with a private company that provides equivalent services.

All equipment with a value of \$5,000 or more will be tagged by Facilities. If you desire to have equipment under \$5,000 tagged, you may request pre-numbered, self-adhesive inventory tags and a computer inventory program designed to track those items. For more information, contact Facilities.

The procedure for the disposal of equipment purchased with a grant or contract is the same as for other university property. In some cases, the university must meet specific obligations to the awarding agency. If so, contact Accounting Services. If there is other equipment you no longer need, please contact Accounting Services.

### **3.3.14 Equipment Custody Policies and Procedures**

University policy stipulates that university-owned equipment cannot be taken off campus without the written permission of the department chair for faculty members or immediate supervisor of staff members. All inventoried equipment must be returned to the university at the end of the project and is the property of SRU, not the PI/PD. Further information is available from Purchasing or Accounting Services.

### **3.3.15 Tracking Project Expenses**

As PI/PD, you will be responsible for ensuring that all expenses charged to your grant or contract are appropriate and do not exceed the available funds. While Accounting Services is available to help you administer your account, you are responsible for all expenses charged to this account.



### 3.4 Purchasing

The PI/PD is responsible for spending the funds as proposed by the sponsor in adherence to the sponsor and university policies. All purchases within SAP area also reviewed for allowability, allocability and reasonableness by the Grant Accountant prior to approval.

- **Allowability** – the goods or services to be paid by sponsored project funds are allowed by the funder, are included in the budget and adhere to SRU procurement policies
  - For Federally funded awards or subawards, please review 2 CFR part 200, subpart E – Cost Principles (specifically part 200.403) or SRU’s [Direct/Indirect Cost Allocation Procedure for Sponsored Agreements/Grants](#).
- **Allocability** – the goods or services to be paid for by the grant funds are pertinent to the activities conducted under this award (see 2 CFR 200.405)
  - It should solely advance the work in this proposal
  - If it benefits two or more projects, it should be reasonable and proportionately paid for and documented.
- **Reasonableness** – a cost is reasonable if, in its nature and amount, does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost (see CFR 200.404).

When the purpose of the purchase is not obvious, include a comment about how the purchases benefits the grant project. This will help facilitate approvals for payment and help when documents are reviewed for audit.

As always, SRU policy must be adhered to for all purchases. If cost share is part of your award, expenses must be held to the same standards as expenses paid by the grant.

### 3.5 PROCUREMENT THRESHOLDS FOR STATE AND FEDERAL GRANTS

1.6 State/Federal Grant Procurements: Due to the complexity of each grant and its unique requirements, it is recommended that the grant administrator work with the procurement office both pre- and post-award to assess and advise on procurements that will be required on a grant.

The Procurement Code creates a presumption that any expenditure of public funds is subject to a competitive solicitation process with limited exceptions such as Sole Source or Emergency Procurements. However, Section 102(a) does provide a specific carve-out for grant compliance. Thus, to the extent that Procurement Code requirements conflict with grant-specific requirements, the grant-specific restrictions control.

The Procurement Code does not apply to grants where a Commonwealth Agency is acting as the grantor. Grants differ most differently from agency procurements in that grantors do not receive a specific good or service for their director benefit or use. When a State System university expend funds, it has received as a grantee to obtain a good or service in support of grant program objectives, then the Procurement Code applies. The Procurement Code does not apply to the distribution of funds to sub-grantees because such distributions are not payments for goods or services.

If the State System is the grant recipient, then the Procurement Code does apply. If the funds are subsequently sub-granted, then the Procurement Code does not apply.

Link to [PASSHE Procurement – 1 – PROCUREMENT HANDBOOK – All Documents \(sharepoint.com\)](#)

Note: Sponsored Project procurement thresholds are different from general SRU procurement thresholds.

### **Sole Source Procurements**

**Purpose:** Sole Source contracts imply that there is only one supplier that can provide the goods/services and that any attempt to obtain competitive bids would only result in one supplier being able to meet the needs of the university.

Before entering into a Sole Source contract, a statement of justification must be sent to legal counsel *in advance* of executing the contract certifying that the contract is appropriate as a sole source procurement. Use the [Sole Source Contract Request Checklist](#) in preparing a [Sole Source Contract Certification](#). Legal counsel must approve all Sole Source Contract Certification forms for purchase that exceed the low-dollar no-bid threshold amount. A contract may be awarded for a supply, service or construction item, without the necessity of a formal competitive process, when Procurement justifies in writing that one of the following statutory conditions exist which meets the definition of a sole source contract:

- Only a single contractor is capable of providing the supply, service or construction.
- A federal or state statute or federal regulation exempts the supply, service or construction from the competitive procedure.
- It is clearly not feasible to award the contract for supplies or services on a competitive basis.
- The services involve the repair, modification or calibration of equipment and they are to be performed by the manufacturer of the equipment or by the manufacturer's authorized dealer, provided the contracting officer determines that bidding is not appropriate under the circumstances.
- The contract for supplies or services is in the best interest of the university.

**Process:** Complete the Sole Source Certification form. Include the supplier's name, the contract amount, and the nature of the purchase. Certify that the proposed contract is a sole source procurement based on one of the statutory criteria listed above.

- Provide justification for the selected criteria and the basis for the selection. It is critical that the Sole Source Contract Certification contains sufficient information for legal counsel to discern that it meets the statutory definition.
- Provide legal counsel with a draft of the Sole Source Contract Certification. If legal counsel disapproves the Sole Source Contract Certification, it will be returned to Procurement with further instructions. If legal counsel approves the Sole Source Contract Certification, post the Sole Source Contract Certification (unsigned) for seven (7) calendar days at Ariba Discovery. Include the following statement when posting: *Public comments regarding this Sole Source Contract Certification may be sent to [contact name, email].*
- During the seven-day posting period, any supplier objections to a Sole Source Contract Certification must be addressed and resolved individually to proceed. It may be necessary to revise the Sole Source Contract Certification. Work with legal counsel to determine the best resolution.

- After the 7-day posting period, if no supplier objections were submitted, affix the required signatures and forward the Sole Source Contract Certification to legal counsel for approval. For purchases that exceed \$250,000 and are awarded in the best interest of the State System, the Sole Source Contract Certification must be signed by the university president or chancellor.
- Post the approved Sole Source Contract Certification form (signed by legal counsel) at the Ariba Network for thirty days.
- Delete the Sole Source Contract Certification postings from Ariba after the end of each posting period.
- A copy of the approved Sole Source Contract Certification must be included with the contract when the contract is submitted to legal counsel. Note: Legal counsel's approval date on the Sole Source Contract Certification must predate the contract signatures.
- If a sole sourced contract is later amended to increase the amount of the contract or extend the term of the contract, and the amendment materially changes the terms or value of the original contract, a revised Sole Source Contract Certification reflecting the new contract amount and/or term may need to be approved by legal counsel and publicly re-posted.

### **3.6 Rate of Spending**

The PI/PD is responsible for spending their sponsored project funds and associated cost share (if applicable) at the rate proposed in the project's plan. Sponsors expect that budgets are expended based on the proposed project's work plan and timeline. Good communication and timely review of financial information by the PI/PD will help avoid spending spikes, address potential audit questions and facilitate close-out of the award.

The PI/PD should develop a spending plan for a controlled spend of the award dollars to avoid a spike in spending toward the end of the award period due to inadequate financial planning. Spending spikes not only pose an audit risk, but often result in unallowable costs that require transfer off of the award.

### **3.7 Budget Tracking**

Budget tracking maintains an up-to-date record of your grant's expenses and remaining balance for project planning purposes. Each purchase should be monitored and reconciled with SRU's General Ledger on a monthly basis by the PI/PD.

- As each expense is made, the PI/PD should obtain the receipt and record the expense:
  - This should include reimbursements, pending purchase orders (encumbrances), catering orders, on campus parking, reprographic orders, salary payments (and related fringe), student wages (entered after each approval period), etc.
  - On campus charges, fringe benefits and indirect costs are charged by the Grant Accountant at the end of the month and will not be reflected in real time thus, it is suggested to encumber anticipated fringe benefits, indirects (based on the award's agreed upon rate), and any known on-campus charges that did not generate a receipt (such as a car rental).
- When all expenses and encumbrances are recorded, it will reflect the most up-to-date record of your grant budget and is a useful tool to track the remaining balance of each cost category and the total award.

This will help you determine if a re-budget or no cost extension is necessary.

### **3.8 Budget Reconciliation**

The purpose of reconciling your budget is to ensure your records match with the official institutional records. By tracking expenses regularly, you can identify mistaken charges, anticipated charges that are missing from the university's official record, or capture charges missed from your records.

At the end of each month, the Grant Accountant will send an email to all PI/PD's with a budget vs actual spreadsheet. At this time, the PI/PD must reconcile their records with the Grant Accountant's monthly financial report provided in SAP.

On a monthly basis:

- Compare the monthly budget report to your records to identify discrepancies.
- When the Grant Accountant includes an expense that was not in your records, gather information to assess if it is a correct charge that was missed in your records or if it is a mistaken charge that needs to be removed from your account.
  - If the expense should not be on your account, please contact the Grant Accountant.
- If your records include expenses not reflected on the budget report, it may just be delayed. If an expense does not clear your budget after two months, contact the Grant Accountant.

### **3.9 COST TRANSERS**

If an error or unallowable cost has been discovered, the Grant Accountant must complete a journal entry to remove the unallowable cost.

Journal entries should only be used to correct errors and not as a mechanism to regularly shift expenses from a different account on to a sponsored project account. This is a highly discouraged situation as it can raise red flags during an audit.

### **3.10 Financial Reporting Tools**

#### **3.10.1 SAP**

SAP is the home to institutional reports and data sources, including the official financial records of SRU. Sponsored Project PI/PD's and administrative staff are granted access to their sponsored projects financial reports after the post-award meeting and can obtain access to Business Intelligence for further financial reports.

## **4 POLICY & COMPLIANCE ASPECTS**

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Listed below are the most common Federal regulations related to grants. The sponsor's award notification may list additional terms and conditions that are required to be followed for that particular award. It is extremely important to read and understand all of the terms and conditions of each grant or contract award in order to maintain compliance. If you are unsure of any of the terms and conditions listed below or on the grant award, please contact the Grants Office director. All polices are listed on the GRASP Office [webpage!](#)

#### **4.1 Drug-Free Workplace Act**

The Drug-Free Workplace Act of 1988 was enacted to ensure that recipients of federal grants and contracts maintain a drug-free workplace and prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace. This includes obligatory reporting of any criminal drug statute conviction to Human Resources within 5 days after the conviction. The university maintains a drug-free awareness program that is available to all employees. SRU supports programs aimed at the prevention of substance abuse by its employees and encourages faculty, staff, and student employees with alcohol and other drug dependency problems to obtain assistance. Each PI/PD of an award of at least \$25,000 is responsible for reading and complying with the conditions of the Drug-Free Workplace Act. The PI/PD is responsible for informing all employees of the conditions of this Act. Copies of SRU's current policy on a Drug-Free Workplace are also available from the GRASP Office or Human Resources.

#### **4.2 Responding to Allegations of Research Misconduct**

Students, faculty, and administrative staff all have a responsibility to ensure that research and creative endeavors are of the highest quality and that any deviations from accepted standards of scholarly performance are reported to appropriate officials. The increasing complexity of the research and creative process, the requirements of Federal and state agencies, and the accountability of university personnel to colleagues, students, the university, and the larger community necessitate that SRU specify an acceptable code of conduct, provide a mechanism for investigating alleged violations of accepted standards, delineate appropriate sanctions for students, faculty and staff, and ensure that corrections to the public record follow any discovery of misconduct. These guidelines may be found in the Policy for Responding to Allegations of Research Misconduct.

Research misconduct means fabrication, falsification or plagiarism in proposing, performing or reviewing research, or in reporting research results. Fabrication is making up data or results and recording or reporting them. Falsification is manipulating research materials, equipment or processes, or changing or omitting data results such that the research is not accurately represented in the research record. Plagiarism is the appropriation of another person's ideas, processes, results or words without giving appropriate credit.

A common denominator in many cases of alleged scientific misconduct has been the absence of a complete set of verifiable data. The retention of accurately recorded and retrievable results is of utmost importance for the progress of scientific inquiry. A researcher must have access to his or her original results in order to respond to questions including, but not limited to, those that may arise without any implication of impropriety. Original experimental results should be recorded, when possible, in bound laboratory notebooks with numbered pages. An index should be maintained to facilitate access to data. All computer or calculator-generated printouts should be affixed to or referenced in the laboratory notebooks. Moreover, errors may be mistaken for misconduct when the primary experimental results are unavailable. Primary data should remain in the laboratory at all times and should be preserved as long as there is any reasonable need to refer to them. When no required period of time is specified by the funding agency, it is suggested that data be kept for 7-10 years. In no instance, however, should primary data be destroyed while investigators, colleagues, or readers of published results may raise questions answerable only by

reference to such data. Custody of all original primary laboratory data must be retained by the department in which they were generated. An investigator may make copies of the primary data for his or her own use or upon leaving the university.

#### **4.3 Financial Conflict of Interest**

In accordance with Federal regulations, the university has a responsibility to manage, reduce, or eliminate any actual or potential Financial Conflicts of Interest that may be presented by a Significant Financial Interest of the project director or co-director, or their immediate families (spouse and/or dependent children). The university requires that PI/PD's and co-directors disclose any Significant Financial Interest that may present an actual or potential Financial Conflict of Interest with a sponsored project. Significant Financial Interest is defined as the value of remuneration (salary and/or any payment for services not otherwise identified as salary) which exceed \$5,000. All PI/PD's must disclose their Significant Financial Interests to the university on an annual basis. Additionally, PI/PD's and co-directors on PHS-funded awards must complete training prior to the start of the research project, and at least every (4) years thereafter.

#### **4.4 Payroll Certification**

As a recipient of federal grant funds, SRU is required to comply with 2 CFR 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Direct charges and committed cost sharing or match for personnel services on federally funded projects for research, educational services, or other activities subject to the Uniform Guidance requirements must produce a distribution of charges that are reasonably accurate in relation to work performed, and be documented in a method acceptable under Uniform Guidance. This method requires the Principal Investigator (PI) to annually certify personnel charges including committed cost sharing.

This standard applies to all SRU faculty and professional staff members who perform research, educational services, or other activities covered by a federally funded grant, contract, or other agreement subject to the Uniform Guidance requirements. Payroll certification does not need to be completed for clerical staff who utilize weekly time sheets, undergraduate or graduate student workers or graduate assistants. Contact Accounting Services for further information.

#### **4.5 Human Research Participants**

SRU has policies and procedures that govern research involving the participation of humans in research. Research is defined as any systematic investigation designed to develop or contribute to generalizable knowledge. Research encompasses work which is conducted on or off campus and includes questionnaires, interviews, tests, observations, surveys, and other experiments, regardless of the content or routine nature of the subject's involvement and even if this work is preliminary to a more extensive study. This definition includes any systematic collection of data from human subjects that occurs in conjunction with classroom projects unless the work is done as a learning exercise for the student and will never be published or presented. This policy ensures

the health, safety, privacy and dignity of all persons participating in research under the auspices of the university.

All research involving human subjects must be approved by the Institutional Review Board (IRB) under the authority of the IRB Chairperson. Any faculty member or student preparing to conduct research involving human subjects should arrange to have the research protocol reviewed by the IRB. Complete policies and procedures, containing application forms, for research involving human subjects may be obtained from the [IRB webpage](#).

Questions concerning research involving the use of human participant in research should be directed to the IRB or GRASP Office.

#### **4.6 Animal Care and Use in Research**

SRU policy specifies that all vertebrate animals under university care will be treated humanely and that the university will comply with federal and state regulations regarding animal care and use. Responsibility for assuring institutional compliance with state and federal regulations has been delegated to the Institutional Official, who is advised by the Institutional Animal Care and Use Committee.

Project directors planning to use vertebrate animals must submit an Application to Use Vertebrate Animals for Research or Teaching detailing plans for laboratory animal facilities, care, anesthesia, etc. The animal care protocol must be approved by the Institutional Animal Care and Use Committee prior to the start of the project before the research may begin regardless of whether the project is externally funded.

The Institutional Animal Care and Use Committee Handbook, outlining university, state, and federal regulations regarding animal care, and the Application to Use Vertebrate Animals for Research or Teaching are available from the [IACUC webpage](#).

Questions concerning research involving the use of animals in research should be directed to the IACUC Office or the Grants Office.

#### **4.7 Bloodborne Pathogens**

If your project deals with blood, human tissue, or blood products, you must obtain approval from the Institutional Review Board and the Environmental Health & Safety Office prior to the start of your project. The SRU Bloodborne Pathogen Exposure Control Plan and individual department exposure control plans should be reviewed regarding appropriate training, prevention, and exposure control requirements. All SRU, state and federal guidelines must be followed. Contact the Environmental Health and Safety Office for more information for additional copies of the Bloodborne Pathogen Exposure Control Plan for SRU.

Special requirements apply to laboratories engaged in HIV, HBV, or other bloodborne pathogen research. The SRU Exposure Control Plan and department specific exposure control plans should be referred to for guidance. The Environmental Health and Safety Office must be informed

regarding research activities that could involve exposure to bloodborne pathogens. The Environmental Health and Safety Office can answer questions regarding the procedures and precautions when dealing with these materials.

#### **4.8 Safety**

Anyone, regardless of official or unofficial status, who assumes or is assigned responsibility for the work or activities of others, is administratively responsible for their safety during such work or activities. The PI/PD is responsible for assuring that all participating personnel on a project are aware of safety requirements, that proper instruction is provided, and that safe procedures are followed.

PI/PD's should be aware that the Commonwealth of Pennsylvania's Department of Labor and Industry and the federal [Occupational Safety and Health Administration \(OSHA\)](#) has issued numerous regulations controlling occupational safety, environmental health, and fire safety. Upon request, staff from SRU's Environmental Health and Safety Office will inform project directors of applicable OSHA regulations and conduct an inspection of the project area to determine compliance with OSHA standards. Contact the Environmental Health and Safety Office for assistance with concerns of safe practices and regulations.

#### **4.9 Biological, Chemical, and Radiation Hazards**

Responsibility for the safety and well-being of all personnel in potential contact with radiation, biological or chemical hazards rests with the PI/PD and appropriate administrative officers of SRU. If you need assistance with policy development or regulations, contact the Environmental Health and Safety Office.

The PI/PD is responsible for ensuring that all personnel under his or her supervision are instructed with regard to the general requirements of safe laboratory or work area operation. This includes safety procedures during emergency shut downs, fire evacuation, and tornado procedures and other types of emergency situations. All personnel under the PI/PD's supervision must be informed of the known dangers in working with hazardous substances which are peculiar to the specific research activities and must take necessary protective and containment measures (see the [SRU Controlled Substance – Research and Instruction Policy](#)). Each laboratory assistant should receive the special training necessary to deal with those hazards and avail themselves of safety education literature and workshops. Documentation should be kept indicating the content of the training, who conducted the training, and the signatures of those receiving the training. All individuals, both employees and students, working directly under the supervision of the project director in an activity where potentially hazardous chemical, radioactive, or biological materials are utilized must be informed of the extent if known. It is the PI/PD's responsibility to see that warnings are posted and that entry is restricted to work areas that contain potentially hazardous chemicals, radioactive, or biological materials. Federal and state regulations control the use and shipping of certain chemicals, venomous animals, and infectious microorganisms. The project director should be cognizant of and comply with these regulations.



All individuals working with hazardous substances must share responsibility for operating in a safe manner once they have been informed about the extent of risk and safe procedures for their activities. Individuals undertaking an activity without direct supervision by a project director become responsible for performing those activities associated with hazardous substances safely. This applies to all students, staff, and employees.

If your project deals with a chemical or biological hazard, contact your department chair to determine if your department has procedures to deal with the treatment of those materials. Otherwise, contact the Environmental Health and Safety Office.

All use of radioisotope materials or radiation generators must be with prior consultation of the Environmental Health and Safety Office. All Radioactive Material Procedures must be followed when using radioisotopes and the use of the radioisotopes is limited to certain university buildings. If you plan to use radioisotope materials, contact the Environmental Health and Safety Office prior to the purchase or use of these materials.

#### **4.10 Recombinant DNA**

The PI/PD must abide by the [National Institutes of Health's Guidelines for Research Involving Recombinant DNA Molecules](#). This document is available from the Grants Office. All recombinant DNA projects must also be approved by the SRU Environmental Health and Safety Office.

#### **4.11 Export Control**

All university international travel is subject to the Federal Export Control Regulations. Export is defined as any oral, written, electronic or visual disclosure, shipment, transfer or transmission outside the United States to anyone, including a U.S. citizen, of any commodity, technology (information, technical data or assistance) or software/codes. Transfers can be by actual shipment outside the U.S., electronic or digital transmission, visual inspection in or outside the U.S., written or oral disclosure, or actual use or application on behalf or for benefit of foreign person or entity. When an individual is traveling outside of the United States on university business, including traveling on grant funds, taking encrypted software and/or research equipment, or even a laptop computer, smart phone, or data storage device, s/he might require an export license, or certification and documentation of a license exception. A laptop computer taken abroad to a controlled country might contain strong encrypted software that is regulated under export control laws. The University is required to document the export (even a temporary export) of licensed items, or exceptions, if the items are owned by the University. SRU's International Travel Request forms will be reviewed by the Export Control Officer to ensure compliance with this regulation.

## **5 INTELLECTUAL PROPERTY**

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Issues regarding intellectual property are becoming increasingly important as more and more faculty and staff produce intellectual property that has patent, copyright or commercial potential. This is particularly true at the time when the terms of a grant or contract are being negotiated. Decisions and agreements reached during the negotiations stage will determine the later ownership of intellectual property resulting

from the project. Because there are important legal and financial ramifications from the topics discussed here, you are strongly encouraged to rely on the staff of the GRASP Office for assistance in protecting your rights, as well as the rights of SRU.

## **6 CONCLUDING THE PROJECT**

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### **6.1 Dissemination and Publication**

Project directors are encouraged to share the results and products of their project with the public and are expected to publish the results of their research activities in professional journals or present the results at a professional conference. A footnote should be included to give credit to the source of support for the research. The GRASP Office will help you interpret specific instructions regarding acknowledgment of the granting agency.

### **6.2 Closing-Out Your Cost Center**

Every grant has a beginning and ending date as stipulated by the funding agency and the timeline you created for your project. You must plan, therefore, for the final closeout of your grant. Accounting Services will contact you prior to the close of your award to assist you.

If you feel that it is not feasible to complete the project by the end of the designated period and you have funds remaining in your account, in most cases you may request a no-cost extension from the funding agency. If this is done in a timely fashion, many agencies will allow you to expend funds beyond the final date of your original grant. Please contact the GRASP Office prior to requesting a no-cost extension. If you spend funds after the closing date of the grant without receiving permission in advance, the agency is likely to refuse reimbursement to the university.

Prior to closing your account, you may want to encumber those expenses that will allow you to disseminate or publish the results of your research activities if you have budgeted that into your project. You should plan these costs near the end of the grant period, comfortably before the closeout date. You should also be sure to process the proper paperwork to terminate grant-funded employees and ensure they use all their vacation prior to the end of the award, unless vacation payoff for terminated employees has been budgeted in the grant. Human Resources should be consulted to assist you with these arrangements.

It is helpful to use a 60-day target date to prepare for closeout. You need to anticipate final expenditures, particularly as they relate to payroll, benefits, and purchasing. Accounting Services will assist you with This. In addition, you may have to relinquish space or equipment that the university or your department loaned to you for the project.

### **6.3 Reporting to the Funding Agency**

Most sponsors require a final, comprehensive project report bringing closure to the project. There are often two parts to this report: a project report describing how well the project met its goals, and a financial report detailing project expenditures. There is usually a firm due date by which the report should reach the granting agency. The basic contract or grant document contains detailed instructions on termination procedures. Although not always a requirement, you should include reprints of any published articles generated by the supported project. The GRASP Office can help interpret the requirements.

A copy of the final report and any additional reports (monthly, mid-term, etc.) and any correspondence must be forwarded to the GRASP Office to be kept on file for auditing purposes.

Accounting Services will complete the final financial report for you. Usually a final narrative summary will be required within 60-90 days of the completion of the grant period. Copies of that report must be sent to the funding agency and to the GRASP Office for university files. The GRASP Office will notify Accounting Services when the narrative is submitted.

### **6.4 Continuation Proposals**

Often grants are made for more than one year. Multi-year grants may require a continuation proposal, which is a progress report of what you have accomplished to date and where you intend to go with the project. The report includes programmatic or research activities along with fiscal reporting. You will need to work closely with the GRASP Office to ensure that continuation applications are submitted on time, and that the university has made an accurate assessment of the budget including a projection of the costs remaining for the current year and a continuation of the budget for the future years.

### **6.5 Records Retention**

The GRASP Office will retain all records pertaining to your project 7 years after the final expenditure report and/or programmatic report(s) or, if applicable, 7 years from when any final action is taken to resolve any claim, audit, or investigation involving grants. For grants that have continuing submissions, the date the last report is submitted constitutes the starting point for the retention period. The administrative offices retain original accounting sheets, purchase orders, invoices, personnel files, payroll records, and other official documents. As project director, you need to retain correspondence and data for up to 7-10 years. The time period required for the retention of records is often stipulated in the detailed information sent from the funding agency to the GRASP Office. The GRASP Office can help you determine the records retention requirement for your award.

**7 DIRECTORY OF OFFICES RELATED TO RESEARCH**

POLICY CONCERNING	WHERE TO GET HELP
<ul style="list-style-type: none"> <li>Misconduct in Science</li> </ul>	Grants Office, 302 Old Main (724) 738-2045
<ul style="list-style-type: none"> <li>Financial Conflicts of Interest</li> </ul>	Grants Office, 302 Old Main (724) 738-2045
<ul style="list-style-type: none"> <li>Payroll Certification Reporting</li> </ul>	Accounting Services, 104 Old Main (724) 738-2236
<ul style="list-style-type: none"> <li>Humans as Research Participants</li> </ul>	IRB Office, 302 Old Main (724) 738-4846
<ul style="list-style-type: none"> <li>Animal Care and Use</li> </ul>	IACUC Office, 302 Old Main (724) 738-4846
<ul style="list-style-type: none"> <li>Bloodborne Pathogens, HIV, HBV</li> <li>Biological, Chemical, or Radiation Hazards</li> <li>Recombinant DNA</li> </ul>	Environmental Health and Safety Office, 145 Keister Road, (724) 738-2465
<ul style="list-style-type: none"> <li>Export Control</li> </ul>	Export Control Officer, 200 Maltby Center (724) 738-2811

And, finally...

We hope that you find this Handbook helpful as you manage your grant. If you have any questions during the grant period, do not hesitate to contact the GRASP Office.

**Congratulations on receiving your award, and we look forward to working with you!**