FACULTY GRANTS
HANDBOOK

STILLMAN
COLLEGE | *Office of*
Sponsored Programs

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INTRODUCTION

This Faculty Grants Handbook is designed to assist Stillman College faculty members in their efforts to obtain and administer grant funding for research or other scholarly activities. It is a reference guide prepared by the Office of Sponsored Programs and approved by the College to provide information about developing and submitting applications as well as administering grant awards through the College.

Some of the information in this handbook is also relevant for ***institutional grants*** – projects that develop curriculum, renovate space, or fund student scholarships, for example – but it is primarily intended as a guide for Sponsored Programs grant-seekers. Faculty members who are interested in pursuing or collaborating on institutional grants can review information on the OSP webpage at stillman.edu and contact the Office of Sponsored Programs for support.

All applications for Sponsored Programs, fellowships, or institutional grants must be submitted through the Office of Sponsored Programs. In addition, preliminary proposals or letters of inquiry to foundations should be submitted through OSP. Submissions to OSP must be reviewed by the Provost/Vice President of Academic Affairs and obtain his/her/his approval on the *OSP Intent to Apply* form.

All policies and requirements addressed in this handbook may not be relevant for fellowship applications or proposals submitted to private foundations. The Office of Sponsored Programs is available to help applicants determine which policies apply.

The Office of Sponsored Programs
Stillman College encourages faculty members to pursue scholarly activities that will contribute to their fields of study as well as reflect and sustain the academic goals and mission of the College. The Office of Sponsored Programs is the College's resource for supporting faculty in identifying funding opportunities, developing grant proposals, and submitting applications to government, foundation, or corporate funding agencies.

The Office of Sponsored Programs includes the Director of Sponsored Programs, the Pre-Awards/Post-Awards Coordinator, and the grants accountant, all of whom work closely together to support faculty who are seeking grant funding. The staff reports to the Executive Vice President and works closely with the Offices of the President, Provost, and Finance and Operations.

The Office of Sponsored Programs assists faculty with locating funding sources for research or other projects and activities by conducting personalized research as well as through a daily "opt-in" Constant Contact announcement and workshops. The Office also helps develop research and project budgets and reviews all aspects of applications prior to submission to ensure compliance with federal, College, and funding agency requirements.

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I. PROPOSAL PREPARATION

Identifying Funding Sources and Seeking College Approval
Funding is available from government and private sources to support such activities as research, travel, equipment, publication, course development, conferences, and seminars. The application process is often lengthy and highly competitive. It is, therefore, advisable to start searching for funding and developing applications well before a project will begin.

Faculty members who wish to seek funding for their individual projects should contact the Director of Sponsored Programs as early in the process as possible. ***Before submission to external agencies, all Sponsored Programs proposals must be reviewed by the Office of Sponsored Programs and approved by the Provost and Dean of the Faculty who have signed an OSP Proposal Transmittal form.***

This review process is important because it: 1) ensures that proposals and projects adhere to all relevant policies; 2) alerts internal administrative offices that funds may be coming in so they can respond knowledgeably to representatives from grant agencies who may have questions about financial arrangements; 3) facilitates the work of the Office of Sponsored Programs in finding other possible sources of funding for faculty research efforts; 4) prevents potential conflicts in terms of limited submissions or longer term fundraising efforts; and 5) provides a key indicator of research effort and productivity.

The Office of Sponsored Programs specializes in researching grant opportunities and can perform a personalized search for funding sources. The Office posts information about grant deadlines on our webpage at stillman.edu along with other important information and required forms. In addition, regular email, Constant Contact, and newsletter notifications about current funding opportunities are sent to faculty.

Developing a Proposal
A telephone conversation with the program officer at the targeted funding agency at an early stage in proposal development is a good way to ensure that a proposed project meets sponsor guidelines and gain valuable tips about shaping the proposal. It is also helpful to discuss proposal ideas with colleagues in the field, particularly those who have received grants from the funding agency.

Experienced principal investigators (PIs) may be able to pass on tips for approaching different sponsors and specific strategies for writing a strong proposal. They may also be willing to read a draft of the proposal and make suggestions. The Office of Sponsored Programs can let applicants know which members of the faculty have held grants from a particular sponsor and may also provide direct assistance with grant writing.

The Office of Sponsored Programs regularly presents workshops on such pre- and post-award topics as budget development, grant review processes at government agencies, hiring grant personnel, and financial recordkeeping and reporting. Workshops also facilitate discussions with experienced grant recipients and panel reviewers from among the faculty as well as staff from relevant offices such as Human Resources, Finance, the Provost's Office, and Grants Accounting.

After determining which funding agency is a good "fit" for the project, the PI should become thoroughly familiar with the application guidelines. It is important to carefully follow all instructions, including such details as font requirements and page limitations, and to adhere strictly to the submission process and deadline.

In addition to sponsor deadlines, applicants must adhere to Stillman College's internal deadline for submission of required materials - which include the Intent to Apply form, the *Proposal Transmittal form,* the budget, the budget narrative, and project summary - to the Office of Sponsored Programs for Provost review **at least three days before the required submission date (10 days before the due date)**.

In general, reviewers of proposals want to read answers to the following types of questions:
- What exactly do you want to do?
- How does the proposed research/project fit within the sponsor's interests?
- Why are you best positioned to lead the research/project?
- How long will it take to do the research?
- What difference will the project make to Stillman College, its students, and the discipline concerned?
- What has already been accomplished in the project's area? (Preliminary research findings may be important.)
- How will you accomplish what is proposed?
- How will the results be evaluated?
- How much will it cost?

Below is a description of typical proposal components and tips for addressing those:

A. TITLE OR COVER PAGE
Many funding agencies, particularly government agencies, provide title page forms that require institutional information, contact information for the College and PI, and project information such as the title and starting/end dates. Applications that are submitted electronically are signed and certified when Sponsored Programs submits electronically. Institutional review and approval of all submissions is facilitated through the *Proposal Transmittal form.*

PIs should submit a completed, signed *Proposal Transmittal form* – along with the proposal summary, budget and budget justification, and any other relevant documents indicated on the form – to Sponsored Programs at least seven (7) business days prior to an application deadline to ensure adequate time for review and approval.

Government funding agencies often request institutional information on application forms, such as:
- Entity Number/Employer ID/Federal ID: **63-0315935**
- Congressional District: **AL-007**
- DUNS #: **07554609310000**
- UEI: **KYGVJ29CL758**
- Indirect Cost Agreement (F&A) Rate: **NA the college does not currently have a negotiated Indirect Cost Rate Agreement. Rather it used 10% of salaries and wages called the DiMinimis Rate.**
- DHHS Indirect Cost Agreement Date: **NA**

B. <u>PROJECT SUMMARY OR ABSTRACT</u>
The abstract is typically a one-page description of the major objectives of the proposed research and the strategies used to meet these objectives. PIs should always write the abstract according to a sponsor's specific instructions since, in addition to providing initial insights into the proposed research or activity, it may be used to assign the proposal to the appropriate study section for review and/or entered into national databases for public access.

C. <u>PROJECT NARRATIVE/DESCRIPTION OF PROJECT</u>
Sponsor guidelines vary, but, in general, the project narrative should include a description of the project's overall goals and specific objectives and justify the need for the project in terms of its impact on the field and relationship to the current objectives of the funding agency. The description also typically delineates how the project objectives will be achieved, how the project will be evaluated, and how the results of the research will be disseminated.

Investigators should state very clearly what they intend to accomplish. Proposals are often rejected because of vagueness in the research questions posed or jargon that is overused or misused. In the proposal, it is important to persuade reviewers of the project's merit and investigator's ability to carry out the research. PIs with preliminary research data may want to include that data.

D. <u>BUDGET</u>
Most agencies provide detailed instructions for budget preparation as well as forms or a specified format that must be followed. PIs should read guidelines carefully <u>before</u> preparing a budget. The Sponsored Programs staff is available to help at every stage of development.

Grant budgets should include all costs associated with the successful completion of the project. They should include a line-by-line calculation of <u>and</u> narrative justification for all direct costs such as salaries, fringe, equipment, and supplies as well as indirect costs (also referred to as F&A or overhead).

Stillman College's *Cost Allowability Policy*, in conjunction with Stillman College's *Purchasing and Expenditure Policy*, provide guidance about allowable costs on federal grant awards. Information is provided below about typical budget line items and guidance for each.

i. Personnel
If possible, all personnel who will participate in the research project should be identified by name, title and/or category of employment. The following are categories of personnel that are often included:
- Principal Investigator (PI) and Co-Principal Investigator (Co-PI)
- Research Associates
- Research Assistants (undergraduate and graduate students)

Note that administrative and clerical staff <u>should not</u> typically be included in grant budgets as a direct cost. Direct charging of these costs is appropriate only if several conditions are met, including the ability to specifically identify staff – and the integral services they provide – with the project or activity.

Faculty/PI time is usually expressed in terms of percentage of effort based on the nine-month academic year. Course buyout or release time refers to time away from the teaching duties of the College to conduct research during the academic year. Faculty

members must receive the approval of their department chairs <u>and</u> the Provost when applying for release time and can consult with Sponsored Programs on rates.

Faculty may also request summer salary according to sponsor guidelines. For summer compensation, PIs should calculate one-ninth (1/9) of the current academic salary for each summer month of full-time effort that will be requested. In multi-year grants, PIs should calculate future summer salaries with a 3% increase. It is important to note that some funding agencies limit summer compensation and/or the percentage used to determine future year escalations. The Director of Sponsored Programs or Pre-Award/Post-Award Coordinator can assist with developing budgets and adhering to guidelines.

PIs are encouraged to seek guidance for determining salaries from Human Resources for Research Associates, including graduate students and postdoctoral assistants. It is recommended that PIs anticipate a 3% annual increase in salary costs for multi-year budgets.

a. *Payments to undergraduate students*: Students who are hired to work on grants should be compensated with wages that meet or exceed Alabama State minimum wage standards. Check with Human Resources for the current minimum wage for student workers employed by Stillman College. Student wages should be processed through PayChex when setup by Human Resources.

b. *Leave Without Pay:* If the award will involve being away for any part of the academic year, faculty must have the support of the department chair, Dean, and Provost regarding the purpose and timing of the leave. Please make sure to review and adhere to Stillman College's *Policy Regarding Leaves of Absence for Faculty with Grants and Fellowships.*

ii. Fringe Benefits
Benefits are calculated for all salaries and wages, including undergraduate students during the summer months. Rates are subject to change and should be verified with the Director of Sponsored Programs.

Currently, a rate of 23% should be applied to the salaries of full-time faculty members, including salaries they may receive for release time during the academic year. Faculty may choose to calculate summer salary benefits at the 23% rate if they want to receive retirement plan contributions for associated time; they may also request 7% fringe rate for summer salary but will not receive any contributions to their retirement plans.

A rate of 23% should be applied to the salaries of all full-time research associates or administrative support personnel.

A rate of 7% should be applied to the wages of Stillman College students working during the summer working during <u>both</u> the summer and the academic year. If a Stillman College student is employed during the academic year and attending classes, her/his wages are not subject to any withholdings so no fringe is required.

A rate of 7% should be applied to the salaries of all part-time research or administrative support personnel.

iii. Consultants
Project directors (PD) may need to hire consultants for unique services or contributions. Stillman College's *Policy on Contracting* provides detailed information about whether and how project directors need to consult with Purchasing the Office of Sponsored Programs to hire a consultant. A *Stillman College Consulting Contract* must be signed before the Consultant can begin work. **Consultants do not receive any fringe benefits**.

iv. Participant Support Costs (NSF grants)
The National Science Foundation includes a category in the budget forms for participant support costs and has restrictive policies about how those funds must be budgeted, spent, tracked, and/or reported. This budget category refers to costs that include stipends, transportation, and subsistence for participants or trainees, rather than employees.

Participant support funds cannot be used for other expense categories without specific written approval from the sponsor. PIs should track and monitor participant support costs separately from other project expenses.

v. Equipment
Equipment is generally defined on federal budgets as a single item of property that has an acquisition cost of $5,000 or more per unit and has an expected service life of more than one year. Each item of equipment should be justified in terms of its importance to the project. PIs may want to let reviewers know that the requested equipment is not currently available at Stillman for use. A vendor quote may be required, so please check proposal guidelines carefully.

vi. Supplies & Materials
In this category, identify as specifically as possible all consumable supplies, regardless of cost, and equipment with a unit value of less than $5,000 or one year needed for the project. PIs who need assistance estimating the costs of unique supply needs, including shipping costs or requirements, can consult with the Purchasing office.

General office supplies such as paper, staples, pencils, and pens are typically not allowable on federal grants unless they can be directly allocated to a specific project and are fully detailed in the budget justification.

Computers and other electronic devices such as cell phones, iPads, and GPS are often used for administrative or instructional activities in addition to research.
These items should not be included in federal grant budgets or purchased with federal funds unless they are:
- Necessary to fulfill the project's scope of work;
- Fully described and justified in the proposed narrative and budget;
- Specifically identified with and used *exclusively* on the project; and
- Approved by the sponsor.

Examples of computer purchases that may be justifiable as a direct charge on a federal grant award include a computer attached to equipment necessary to analyze data or a laptop used to conduct tests or interviews in remote locations.

vii. Publications
Some sponsors provide support for anticipated publication costs of research results. PIs may want to consider page charges and reprint costs in their estimates.

viii.   Travel
Travel may be necessary to conduct fieldwork or attend relevant conferences. All travel expenses included in a grant budget (transportation, lodging, meals, and incidentals) should directly benefit the project.

Reviewers typically scrutinize this category so PIs should provide as much detail as possible for travel expenses in the narrative justification, including the name(s) of all travelers as well as the purpose, destination, and time frame for the proposed travel.

U.S. General Services Administration (GSA) travel rates will apply to all federally sponsored grant for per diem, lodging, meals and incidentals (M & I). Faculty should consult GSA when preparing budgets and reference GSA in budget narrative.

Requests for foreign travel funding should be detailed, and PIs should note that some federal agencies only allow travel to conferences in foreign countries if the PI is actively involved in the program and/or the meeting has direct relevance to the project.

The Director of International Study Abroad can provide crucial pre-departure support and guidance to faculty traveling abroad, as well as support abroad during an emergency. Stillman College strongly encourages faculty members to consult with the Director regarding visa and other entry requirements, health preparations and required vaccinations, and policies around U.S. export controls. Additionally, all faculty traveling internationally on Stillman College business (e.g., conferences, research trips) are highly recommended to register their travel with both Stillman College and the U.S. State Department.

Stillman College will destination embassies to provide emergency travel support to all College affiliates traveling on College business. The Director of International Study Abroad also monitors international security, natural disasters, medical alerts, and other emerging global issues daily, and will be in touch with faculty abroad in the case of an emergency in the region.

Faculty traveling with undergraduate students for any purpose, including faculty research, are required to meet with the Director to understand their responsibilities as a trip leader, and are required to register their travel with Stillman College Executive Vice President and Provost.

Please see Stillman College's *Expenditure Policy* regarding acceptable travel expenses and details regarding travel advances or reimbursement.

ix. Subcontracts/Subaward   Agreements
When subcontracts or subawards are necessary for a project, the total dollar amount budgeted should include both the direct and indirect costs of the subcontracting party. Please note that subcontractors differ from consultants or vendors in terms of their respective roles on a project.

A subcontractor is a person or an entity that enters into a formal agreement to conduct significant portions of the work described in the research plan. Proposed subcontractors need to provide Stillman College with a detailed budget, which is incorporated in the overall application, and must agree to adhere to all applicable federal requirements.

PIs who are considering including a subaward/subcontract in an application should contact the Director of Sponsored Programs.

x. Letters of Commitment or Support
Letters from collaborating individuals or organizations are often required and should be sought from partners well before the submission deadline. A request should be accompanied by an executive summary or abstract that explains the project.

xi. Indirect Costs
Indirect costs, also known as Facilities & Administrative (F&A) or overhead costs, cover operational expenses at Stillman College that are necessary, but that cannot be attributed to any single project, such as utilities and administrative costs. This rate should be applied to all salaries and wages included in grant budgets that allow full recovery; **fringe benefits and other costs are not included in this calculation**. The rate is subject to change and should be verified with Sponsored Programs.

Certain government agencies or programs as well as private foundations may limit indirect costs or disallow them entirely. Check guidelines carefully for such limitations. Applications that disallow or restrict requests for indirect costs must be approved by the Office of Sponsored Program, and sponsor guidelines should be attached to the *Proposal Transmittal form* to justify the reduced rate.

xii. Cost Sharing
Cost sharing, sometimes referred to as matching, is a project cost that is defined in a grant proposal or budget and not requested from or reimbursed by a funding agency. *Mandatory cost sharing* means that a sponsor requires this type of contribution as a condition of the award.

Stillman College generally encourages applicants to limit cost sharing to those instances where a sponsor mandates it. Note that, in some cases, *general* statements in proposal narratives may be appropriate to indicate a principal investigator's participation without creating a contractual, auditable quantified commitment of effort. Sponsored Programs can provide additional guidance in those instances.

Whether it is required by a sponsor or not, any cost share committed in a grant proposal or budget and accepted by the sponsor becomes legally binding and is subject to audit. PIs should, therefore, identify the source for and seek approval on all matching funds at the time of application and track those expenditures post-award.

E. CURRICULUM VITAE / BIOGRAPHICAL SKETCHES
In most instances, sponsors require curriculum vitae or biographical sketches for the PI and all key personnel. They should be current and adhere to all requirements, including page limits.

F. INSTITUTIONAL OVERVIEW OR PROFILE

Sponsors may require institutional information, such as the number of graduates in a particular field. Note that these types of requests may require the involvement of multiple offices on campus, so PIs should request the required information well in advance of submission deadlines.

II. PROPOSAL SUBMISSION

A. <u>SUBMISSION APPROVALS</u>
The pre-submission process for all proposals or applications is as follows:

    i. The principal investigator's department chair should be notified about any proposal being submitted. This allows for better coordination of research efforts and teaching schedules. *The department chair must approve of any request for release time or leave without pay via email or letter.*

    ii. The PI should send the completed, signed *Proposal Transmittal form* – with approval of the department chair, as required – along with the budget, budget justification, project summary, and any other required forms to the Director of Sponsored Programs **at least seven (7) business days before the application submission deadline (not the application due date).** Stillman College requires that PIs complete the *Financial Conflict of Interest report* form for all federal grants.

    iii. Sponsored Programs will review the documents for completion and accuracy.

B. <u>APPLICATION SUBMISSION</u>
After Sponsored Programs approval, the proposal can be submitted to the sponsor agency. Most research applications are submitted electronically via Grants.gov or another federal agency portal.

Note that some agencies require the individual registration of PIs and assign unique usernames or credentials. Principal investigators who have not yet registered should contact the Director of Sponsored Programs no later than two weeks before the application deadline for assistance with completing that process.

National Science Foundation (NSF) proposals, for example, are submitted through FastLane (www.fastlane.nsf.gov) and PIs must register to obtain an NSF ID and confidential password. Once an application has been uploaded to FastLane, PIs follow instructions to allow the Authorized Organizational Representative (AOR) to review and submit the proposal. PIs submitting to the National Institutes of Health (NIH) register via eRA Commons, NIH's portal.

C. <u>PRE-AWARD BUDGET MODIFICATIONS</u>
Funding agencies may request budget modifications to pending proposals before the award is approved. These modifications must be reviewed by the Director of Sponsored Programs, who may need to seek approval from the Provost.

D. <u>SPECIAL CONSIDERATIONS</u>
    i. Human Subjects
    When a project involves human subjects, PIs must receive approval from the Institutional Review Board (IRB) at Stillman College. Some agency submissions require certification of IRB approval within a certain time period after the submission date or pending approval at the time of submission, so agency guidelines should be consulted. The Stillman College IRB meets monthly in lieu of the Office of Sponsored Programs

Steering Committee meeting, if necessary, during the fall and spring semesters, and as needed during the summer. To assure a timely review, PIs should submit applications to the IRB at least two weeks before a scheduled meeting.

Research projects being conducted by Stillman College undergraduates: If the researched data may be used as part of a larger published project, IRB approval must be obtained. Check the CITI website for additional instructions and information.

ii. Animal Welfare
Any member of Stillman College who plans to initiate research involving animals must submit a protocol to the IRB. The PI on an animal protocol form is required to have a full-time appointment and have the rank of Associate Professor or higher. Adjunct faculty or instructors may be PIs on an animal protocol in exceptional circumstances. In these instances, the Dean/Chairman/Director must write a letter.

iii. Responsible Conduct of Research (RCR)
Stillman College requires that all undergraduate students who participate in NSF-Sponsored Programs or relevant NIH training grant programs complete CITI Responsible Conduct of Research (RCR) training.

PIs at Stillman College are responsible for assuring that undergraduates, postdoctoral researchers or graduate students involved in their Sponsored Programs receive appropriate RCR training. Training should be completed within one month of a researcher's commencement of work. When individuals are working on projects for a short time, such as the summer, training should be completed within the first week of participation.

Stillman College has designated the Director of Sponsored Programs to oversee RCR training compliance, which includes verifying that NSF-supported researchers and any NIH-sponsored researchers on awards with a relevant training component have completed RCR training.

RCR Training Options
Stillman College requires the completion of at least one of the following training options:

1) Completion of relevant online Collaborative Institutional Training Initiative (CITI) modules for NSF-sponsored researchers and any researchers on relevant NIH training grants. PIs should select relevant CITI courses for all student researchers associated with their NSF or NIH training grants based on their research and role(s), and inform them about how to access the training. Note: CITI courses satisfy NSF requirements, but PIs of NIH training grants may need to coordinate or provide additional in-person training. PIs who have questions about additional training should consult with the Director of Sponsored Programs.

   Upon completion of CITI coursework, each student or other participant must print a certificate, and PIs are responsible for submitting certificates to the Director of Sponsored Programs.

2) Some departments have developed workshops or courses that address the responsible and ethical conduct of research. Completion of a Stillman

College course or workshop on RCR can satisfy the training requirements or be used to supplement CITI training.

PIs should discuss questions or training options with the Director of Sponsored Programs.

iv. Subcontracts

A subcontract or subaward is a formal agreement with a second party that is entered into to delegate some portion of the approved research. Under a cost reimbursement agreement, subcontractors are reimbursed for allowable costs up to the support level agreed to in advance. PIs should contact Sponsored Programs well in advance if they are considering entering into a subcontract agreement.

v. Collaborative Proposals

A collaborative proposal is developed when two or more investigators at different institutions agree to work on a project together but receive separate grant awards. When submitting a collaborative proposal, PIs typically electronically "link" some proposal elements while also submitting some different documents, including budgets. Sponsored Programs often needs to coordinate directly with the Sponsored Research office at collaborating institutions and will work with the PI to establish contact and facilitate that coordination.

vi. Financial Conflict of Interest Policy

Stillman College's *Financial Conflict of Interest Policy* is designed to maintain the trust of the public, research volunteers, and the College research community and to help assure institutional compliance with applicable government regulations concerning outside financial relationships and research.

The policy applies to the PI and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research sponsored by a federal research grant or proposed for such funding. This may include collaborators or consultants. This policy does not apply to conflicts of interest or commitment.

The College requires that, prior to the submission of an application for funding to a federal funding agency, each investigator report to the College any significant financial interests that may present a conflict of interest with respect to the project. The College is responsible for identifying and managing, reducing, or eliminating any conflicts of interest prior to the expenditure of any grant award.

vii. Grants Administered Outside of the College

PIs who choose to accept grant or fellowship funding directly and not through the College should note that Stillman will not contribute retirement funds for the time period covered. Also, in some cases, PIs may need to discuss with HR whether they can continue contributing to Fidelity Investments through an existing Salary Reduction Agreement (SRA).

viii. Intellectual Property and Material Transfer Agreements

Faculty applying for grants or engaged in sponsored activities should familiarize themselves with their rights and responsibilities with respect to intellectual property and copyright.

When researchers need to transfer tangible materials to other academic institutions or

other industry relevant organizations - or receive materials from another college or relevant organization - *Material Transfer Agreements* (MTAs) are contracts that can govern those transfers and protect rights. Biological materials such as reagents or cell lines are some of the most frequently transferred materials, but MTAs can be used for a variety of materials, including chemical compounds or software.

Under U.S. export control laws (see below for more details), a license may be required from the Bureau of Industry and Security of the Department of Commerce for the export of certain materials, including materials that could possibly be used in chemical or biological weapons such as human, animal, or plant pathogens; toxins; genetically modified microorganisms; radioactive materials; or magnetic metals.

Researchers should consult with Sponsored Programs before they receive material from or send material to an outside source.

ix. Export Controls

"Export Controls" are U.S. laws and regulations that govern the transfer of controlled materials or information to foreign countries or foreign nationals. These laws and regulations are detailed and complex. *Note that export controls apply to all international activities regardless of whether external grant funding supports them.*

In general, in addition to regulating what is commonly known as exports (the shipment, transfer or transmission of items outside the U.S.), U.S. export controls laws also apply when research, data, and technology (such as software or source code) are released. Export activities also include "deemed exports," which are written, oral, or electronic communications to foreign nationals, carrying items "by hand" when traveling overseas, or providing access to equipment, facilities, or professional services to foreign nationals.

Basic and applied research in science and engineering – research with results that are capable of being published and shared broadly without any conditions of review or approval – conducted on campus or with affiliated U.S. institutions is covered by the Fundamental Research Exemption and not subject to export controls. This exemption is relatively broad, but it is limited to the transfer of information, and would not permit the transfer of tangible items outside the U.S. In addition, the Fundamental Research Exemption may not apply to research that is conducted abroad by Stillman College researchers. Some issues to consider with respect to export controls include:

- Project performance site(s) and whether any site other than a U.S. academic/hospital research facility will be used;
- Whether any portion of the research will be conducted outside the U.S., or involve shipping or carrying items into a foreign country;
- Whether research results or deliverables will be shared with collaborators in a foreign country or foreign nationals prior to publication;
- Whether the funding agency or collaborator(s) indicates that export-controlled materials or items that cannot be shared with non-US citizens; and
- Whether researchers will be taking materials or items – including, but not limited to, a college laptop – to countries that are subject to sanctions. The federal government may prohibit taking electronics, data, or software to these countries. For example, taking a college laptop with standard software and no specialized data to certain embargoed countries is prohibited. PIs can check with the Director of International Study Abroad for countries currently subject to

sanctions as the list is subject to change, and the levels of sanctions and restrictions vary by country.

Faculty who are traveling with college laptops or other equipment may need specialized training to understand the associated implications, risks, and personal responsibility. Researchers should consult the IT Department with questions or concerns.

x. Dual Use Research of Concern (DURC)

The U.S. Government Policy for Institutional Oversight of Life Sciences Dual Use Research of Concern requires Stillman College to provide institutional oversight of "life sciences research that, based on current understanding, can be reasonably anticipated to provide knowledge, information, products, or technologies that could be directly misapplied to pose a significant threat with broad potential consequences to public health and safety, agricultural crops and other plants, animals, the environment, materiel, or national security."

If PIs are proposing to use any quantity of the following 15 agents and toxins, Stillman College must evaluate for DURC potential:

1. Avian influenza virus (highly pathogenic)
2. *Bacillus anthracis*
3. Botulinum neurotoxin
4. *Burkholderia mallei*
5. *Burkholderia pesudomallei*
6. Ebola virus
7. Foot-and-mouth disease virus
8. *Francisella tularensis*
9. Marburg virus
10. Reconstructed 1918 Influenza virus
11. Rinderpest virus
12. Toxin-producing strains of *Clostridium botulinum*
13. Variola major virus
14. Variola minor virus
15. *Yersinia pestis*

PIs should promptly notify IRB about plans to work with DURC agents or with any questions. Stillman College's full DURC policy is available on the Office of Sponsored Programs webpage at stillman.edu.

III. POST-AWARD ADMINISTRATION

A. AWARD NOTIFICATION

When a proposal has been approved for support by a sponsor, the PI and the institutional official are typically both notified. In some cases, the receipt of notification of the award requires signature by the institutional official. In the case of fellowship awards, the individual faculty applicant is often the only person who receives notification. **Please inform the Director of Sponsored Programs as soon as possible when a proposal is awarded or when it is declined.**

When a PI receives an award, he or she should review and complete Stillman College's *Grant Acceptance Form* or *Fellowship Acceptance Form*, which delineate award terms and conditions as well as any relevant policies and processes relating to the administration of the award. In addition, the Director of Sponsored Programs and Controller invite all PIs of federal grants to

attend an orientation meeting to answer questions about the award terms and conditions and related policies and processes.

B. ESTABLISHING AN ACCOUNT

Post-award administration of grant budgets is facilitated through the Finance Office. Once Sponsored Programs is notified of a grant award, a *Budget Account Set-Up Form* is submitted to the Controller, with a copy to the PI, and the grant account is established. The PI should verify that the budget lines set up in the account correspond as closely as possible to the items in the approved grant budget.

The PI will receive monthly budget statements from the Controller providing information about expenditures of funds on a per budget line basis. **It is important for the PI to reconcile the College's records with his or her/his accounting records.**

The PI is responsible for initiating and approving charges to sponsored projects and regularly monitoring grant accounting records and financial reports. She or he is also responsible for reviewing financial reports on a timely basis to establish the allowability of all entries and to minimize the need for cost transfers.

C. DRAWING ON THE ACCOUNT

Stillman College's *Cost Allowability Policy*, in conjunction with the *Purchasing and Expenditure Policy*, provide guidance to ensure the consistent treatment of grant-related costs and to facilitate an understanding of allowable costs for federal grant awards.

Post-award expenditure reviews and approvals prior to payment are processed through the Controller's Office. A *Purchase Requisition Form* should be completed and signed by the authorized PI. The requisition and relevant supporting documentation should be submitted to the Grants Accountant. Please ensure there are sufficient monies budgeted for the purchase prior to submitting a purchase requisition. The account number assigned to the grant and the correct accounting codes must be indicated on all forms.

Special requirements and restrictions may apply to certain types of purchases. Computer hardware and software purchases, for example, should be coordinated with IT as well as any contracts regarding such purchases.

When PIs are contemplating a purchase of $5,000 or more, they should notify the Director of Business Services before contacting vendors for guidance about the bidding process. Purchasing staff is available to provide sample bidding documents and eligible vendor lists for certain commodities. **For all purchases over $5,000, three written bids, quotations, and/or proposals are required before the College can commit to the purchase.** Copies of the bids or proposals must be submitted to Purchasing along with the *Purchase Requisition*. For orders where a PI believes there is only one qualified vendor, he or she must obtain the Purchasing Director's approval on a *Sole Source Justification Form* before initiating the procurement or contract renewal process.

Stillman College is tax-exempt; Alabama sales tax should never be included in amounts to be paid or reimbursed. If any purchases are not made through the Director of Business Services, the store must be provided with a copy of Stillman College's tax-exempt form, which can be obtained from Accounts Payable or by emailing the Director of Business Services. *Travel and Expense Reports* are available on the Finance Office webpage at stillman.edu along with relevant policies and procedures. **Remember to keep all receipts.**

D. SALARY REIMBURSEMENT
In order to receive faculty salary supplement or reimbursement from a grant, the Provost must appoint the faculty and submit written notification to Human Resources and the Comptroller. Any tax and pension implications or questions about grant-sponsored compensation can be discussed with Human Resources.

Note that any post-award changes in the scope of effort of the principal investigator, project leader, or project partner (e.g., if a PI takes a leave of absence for one semester of a multi-year award or a co-PI at a collaborating college withdraws from the project) **must receive the prior written approval of the sponsor.**

E. NON-STUDENT EMPLOYEES
All employees hired through a grant, except Stillman College undergraduate students, are processed through Human Resources. It is important to notify the Director of Human Resources about any grant-related hires. If the position is open, Human Resources can assist in the preparation of a job description. All new employees will need to complete the appropriate paperwork in the Human Resources Office in order to be added to the payroll.

F. STILLMAN COLLEGE STUDENT EMPLOYEES
PIs should work with Student Affairs to hire any Stillman College student on their grant to discuss forms, instructions for hiring, Federal Work Study information, internships, etc.

G. BUDGET REVISIONS
Some sponsors allow PIs to revise budgets without prior approval, while others require approval when re-budgeting across spending categories or when changes exceed a specified percentage of the award amount. Even if sponsor approval is not required, Stillman College requires PIs to complete a *Budget Readjustment Form* to ensure accuracy of the reallocation in the system.

Uniform Guidance (2 CFR 200) sets forth standards for grants administration in higher education institutions. Federal grantees making one or more of the following changes must request prior approval from the sponsor:
(1) Change in project or program scope or objective (even if there is no associated budget revision requiring prior written approval).
(2) Change in a key person specified in the application or award document.
(3) The absence for more than three months (or a reduction in time devoted to the project of 25% or more) by the project director or PI.
(4) The need for additional federal funding.
(5) The transfer of amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa, if approval is required by the federal awarding agency.
(6) The inclusion, unless waived by the federal awarding agency, of costs that require prior approval in accordance with relevant OMB circulars.
(7) The transfer of funds allotted for participants to other categories of expense.
(8) Unless described in the application and sponsored in the approved awards, the subaward, transfer or contracting out of any work under an award, except for the purchase of supplies, material, equipment, or general support services.

There are additional instances in which individual sponsoring agencies may require approvals for revisions, including requests for no-cost extensions or changes within the same line item that may need to be considered within agency regulations (such as proposing international travel versus domestic travel). Requesting and documenting prior approval when it is required helps ensure that costs are not subsequently disallowed.

For those instances included above and/or for which individual agencies require prior approval, a PI who wants to spend grant funds in ways that differ from the original/approved budget should prepare a written budget revision and letter that provides a line-item increase and/or decrease of funds and justification for the revision.

Sponsored Programs will review the request and justification. If the request is sufficiently documented and justified, Sponsored Programs will then submit the modification request to the sponsoring agency, as required, and request written authorization.

For budget revisions that do not require sponsor approval, the PI should prepare a written summary of the revision(s) and justification and send all documents to Sponsored Programs for review and guidance for next steps. If allowable, the Controller will process the budget revision.

If a PI is not be able to complete the project within the grant term, the PI may request a no-cost extension from the funding agency. Requests for no-cost extensions are processed by the Director of Sponsored Programs. The sponsoring agency may require financial information, which is available from the Controller.

H. REPORTING REQUIREMENTS
PIs are responsible for meeting all reporting requirements. Federal agencies typically require annual/interim and final reports to document accomplishments as well as compliance with the terms and conditions of federal awards and **Sponsored Programs sends a reminder to each PI about report deadlines.**

Reports often include a narrative section describing the progress of the project as well as supporting financial data. The PI is responsible for preparing the technical section of the report. Federal agencies often require that reports be submitted online and have formats/fields that must be adhered to. All NSF grant narrative reports must be submitted via Research.gov. NIH reports should be submitted using the eRA Commons Research Performance Progress Report (RPPR) module.

The Controller or Grant Accountant submits financial reports on government grants. The PI should promptly submit all receipts to the Grant Accountant to ensure accurate financial reports. If an extension is needed on a report deadline, seek the assistance of Sponsored Programs well in advance of the deadline. Late reports can result in delays in subsequent drawdowns, grant reviews, and awards.

I. CLOSING OUT AN AWARD / REQUESTING A NO-COST EXTENSIONS
PIs will receive a closeout notice from the Grant Accountant approximately 120 days before the project period end date. They should review the most recent financial reports to ensure that all project expenses have been processed and appropriately charged. For federal awards, final financial reports must be submitted by Stillman College no later than 90 days from the award end date; so timely review and processing are important.

PIs who plan to request a no-cost extension should contact the Director of Sponsored Programs about next steps. **Note that many federal agencies have deadlines for requesting no-cost extensions so PIs should make sure to reach out well before the end date to ensure they meet those deadlines.**

IV. NON-SPONSORD PROPOSALS

Do not lose hope if a proposal does not receive funding after one (or two) submissions! Many first-time applicants are declined. Competition has increased dramatically in recent years while available funding has decreased.

Many sponsors supply a copy of the reviewers' notes upon request. Office of Sponsored Programs is a good resource regarding resubmission and how to address reviewer comments. The team is also able to help PIs seek information about alternative funding sources and opportunities.

INSTITUTIONAL GRANTS

Institutional grants are targeted for College needs, priorities, and special projects. Such grants are usually programmatic. Grants for curriculum development, renovation of space, or to acquire necessary instrumentation for a particular curricular or pedagogical project are considered institutional. Institutional grants and reports can be initiated in a variety of ways: a Request for Proposals (RFP) from the sponsor; an approach to a sponsor by the College (usually preceded by conversations between a College administrator or faculty member and a Program Officer); or a tip from a colleague at another institution or an alumnus.

The College encourages faculty members to present ideas for institutional grants or fundraising sources to the Executive Vice President. After an initial review, the Executive Vice President will then seek confirmation from the appropriate Stillman College official (usually the President, Provost, and/or a Vice President). No application for an institutional grant, letter of inquiry, or response to RFP should be submitted without such approval, which allows for better coordination of proposals and assures that funding requests correspond to the College's priorities. Similarly, initial efforts to reach out to Foundation staff should be coordinated through the Office of Institutional Advancement to avoid duplication of efforts.

To develop an institutional grant proposal, the Executive Vice President will typically approach relevant faculty members to "brainstorm" about an initiative, develop specific ideas, and provide necessary information for the request. Institutional grant proposals and reports are usually written by the Project Director or another member of the team in close collaboration with faculty. Responsibility for developing a suitable budget rests jointly with the Executive Vice President, participating faculty members, and representatives from the Office of Administration and Finance, which may need to review and approve specific line items. Final proposals and budgets must be reviewed and approved by either the President or the Provost.

Each institutional grant is assigned a Principal Investigator (PI) for the proposed project, appointed by the Provost or other administrator. The PI is responsible for the administration of financial expenditures of the grant (in conjunction with the Controller's Office.) The PI is also responsible for working with the Office of Sponsored Programs to submit timely and accurate reports to the sponsor.

Check with the Office of Sponsored Programs and the Institutional Advancement for recent sponsors /donors for institutional projects to avoid duplication of efforts.