



POLICY AND PROCEDURE  
**MANUAL**

**STILLMAN**  
COLLEGE

| *Office of*  
Sponsored Programs

## FOREWORD

Stillman College's Office of Sponsored Programs has been established to increase faculty proposal development, increase faculty and student research, and increase student graduate school enrollment.

The purpose of these policies and procedures is to help Principal Investigators (PIs) and Project Directors (PDs) become familiar with the grant development process at Stillman College, common issues, pre-award transactions, and methods for ensuring they submit the best proposal representative of them and the institution.

Throughout this document, the word "**must**" is used to indicate a requirement. Whereas, the word, "should" or "may," indicates a best practice or recommended approach rather than a requirement and permits discretion.

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## **PRE-AWARD POLICIES AND PROCEDURES**

The purpose of these policies is to help Principal Investigators (PIs) and Project Directors (PDs) develop proposals and pre-award transactions that adhere to Federal Uniform Guidance, commonly accepted accounting practices, and best practices in grant proposal development.

Policy Name: **INTENT TO SUBMIT A PROPOSAL FOR FUNDING**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### Policy Statement:

When responding to a NOFA, RFP, RFQ, NRA, BAA, FOA, or RFB with the proposed terms and conditions stated in the solicitation, the investigator **must** notify OSP by completing and submitting an *Intent to Submit* form. PI/PDs **must** discuss and review a proposal concept with directors, department heads, and/or deans to ensure the project meets the division's goals and objectives.

### Procedures for Implementation:

When developing a proposal, PIs **must** address the following:

- Identify potential intellectual property products.
- If intellectual property is involved, the intellectual property form **must** be completed.
- If the proposal is a partnership or collaborative venture, a *Teaming Agreement* **must** be completed.

Once a PI/PD has addressed the above concerns and completed the proposal, a PI/PD **must** complete *the Intent to Submit form* which can be downloaded from the OSP webpage or requested at [osp@stillman.edu](mailto:osp@stillman.edu).

### Publication of Policy and Procedure:

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### Compliance:

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **COST SHARE/MATCH AND SIGNATURES REQUIRED**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

**Policy Statement:**

Prior to encumbering College funds to match federal grant dollars on a proposal/application PIs and/or Project Directors **must** get approval from supervisors and the match source **must** be identified, available, and not encumbered on another grant application.

**Procedures for Implementation:**

Signatures from supervisors **must** be obtained prior to submitting *the Intent to Submit* form to OSP.

Terms & Conditions	Required Routing of Intent to Submit Form
With no College Match	Department Head, Dean/Director
With College Match	Department Head, Dean/Director, Appropriate Vice President
Release time Match	Department Head, Dean/Director, Provost/Vice President Academic Affairs
Equipment Trust	Department Head, Dean, Provost/Vice President Academic Affairs

Cost Sharing is that portion of a total sponsored project's costs that are not borne by the sponsor. Cost-sharing is required by a sponsor as a condition of the award (Mandatory Committed).

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **INTERNAL APPROVALS**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

### **Policy Statement:**

The Pre-Award Coordinator **must** review the Proposal Review Transmittal Form to ensure appropriate execution by the **PI**, Department Chair, Division Dean, and in instances wherein the Dean serves as the **PI**, or the Director who reports directly to the President, the Provost, Executive Vice President, or President's signature **must** be obtained.

Additionally, the Pre-Award Coordinator **must** review proposals to ensure that appropriate applications/notifications have been made to the Institutional Review Board, the Animal Care and Use Committee, or the Biosafety Committee, if appropriate.

### **Procedures for Implementation:**

After a full review, the Pre-Award Coordinator **must** submit the proposal to the Director of Sponsored Programs for approval. When the Director of Sponsored Programs signs the transmittal form, the proposal can be submitted to the sponsor.

### **Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### **Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **PROPOSAL SUBMISSION**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

The Office of Sponsored Programs **must** submit all proposals either electronically or manually.

**Procedures for Implementation:**

All applications (whether submitted electronically or manually) **must** be presented to the Office of Sponsored Programs with a signed *Proposal Transmittal* form prior to submission.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.



Policy Name: **ELECTRONIC PROPOSAL SUBMISSION**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### **Policy Statement:**

All proposals **must** be submitted electronically (i.e., FastLane, Commons, ASSIST, Nspire, Grants.gov, etc.) unless otherwise stated by the sponsor or a request to submit manually has been made by the PI.

### **Procedures for Implementation:**

All applications (whether submitted electronically or manually) **must** be presented to the Office of Sponsored Programs with a signed *Proposal Transmittal* form prior to submission.

### **Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### **Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **MANUAL PROPOSAL SUBMISSION**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### **Policy Statement:**

The decision to accept a proposal submitted manually is at the discretion of the Sponsor. Unless otherwise stated in the grant guidelines or permission obtained in writing from the sponsor agency representative, all proposals and applications **must** be submitted electronically. If permission has been obtained by the funding agency to apply manually, directions **must** be followed explicitly, including the selection of commercial carrier or U.S. mail.

### **Procedures for Implementation:**

Applications requiring a timestamp **must** be processed in the Stillman College mailroom or local Post Office and a copy of the receipt **must** be sent to the Office of Sponsored Programs.

All applications (whether submitted electronically or manually) **must** be presented to the Office of Sponsored Programs with a signed *Proposal Transmittal* form prior to submission.

### **Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### **Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **CONCURRENT SUBMISSIONS**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

When the same proposal is being submitted to other sponsors, a statement **must** appear in each proposal indicating that it is a concurrent submission.

**Procedures for Implementation:**

Applications requiring a timestamp **must** be processed in the Stillman College mailroom or local Post Office and a copy of the receipt **must** be sent to the Office of Sponsored Programs.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **CERTIFICATIONS AND REPRESENTATIONS**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

**Policy Statement:**

Certifications, assurances, and other required forms **must** be prepared by the PI for signature by OSP, AOR, or President.

**Procedures for Implementation:**

In addition to the investigator's signature, the *Proposal Transmittal Form* **must** also be signed by the department head or chair and Dean or Center Director. Investigators requiring signatures for cross-unit or interdisciplinary proposals should take into consideration the additional time needed to obtain the cross-unit signatures.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **INSTITUTIONAL COMMITMENT**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

Investigators/Directors **must** not contractually commit Stillman College.

**Procedures for Implementation:**

When Stillman College is the lead institution on a collaborative application, OSP requires a statement from each participating institution/organization that includes a full cost budget and scope of work. - [Sample Subcontract Agreement](#)

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **COMPENSATION**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### Policy Statement:

**Salary** compensation **must** be based on the percentage of the time the employee will spend on the project. Example: (monthly salary rate x \_\_\_% of effort x number of months.) If the project is multi-year, **you may include a 3% annual increase**. Check with OSP for future projections of increases. Salary requests for non-College project staff **must** be listed under the “Consultants” line item. Consultants’ payments are not salary or wage payments and **must** not include fringe benefits. Faculty **must** not commit to more than 100% of time combined for teaching and grant projects. **(See Policy on Time and Effort)**

**Academic Year** for nine-month faculty, for this Policy, is August 15 through May 15.

**Summer Term** for nine-month faculty, for the purposes of this Policy, is from May 16 through August 14.

**Base Salary.** The annual permanent salary of the employee as it appears in the employment contract of the employee or subsequent letters of notice of salary increase/decrease plus any supplemental administrative stipends of one full year or more. For full-time faculty, the salary approved by the Provost/Vice President for Academic Affairs is the Base Salary.

**Additional Compensation.** All one-time or special payments paid to faculty and staff beyond the base salary when paid for activities of short duration including, but not limited to, activities such as conducting seminars, workshops, and training in other than the home department; teaching continuing education or summer school courses; dual employment payments from other institutions; internal grant stipends from the College sanctioned awards; sponsored program payments during the summer term for nine-month faculty, and other interim and temporary assignments of less than one year.

**Nine-Month Faculty.** Upon appropriate approvals, the faculty member can earn up to 3/9ths additional compensation from all sources paid through the College payroll office during the Summer. The 3/9ths maximum is calculated on the base salary.

For summer compensation, PIs should calculate 1/9 of the current academic salary for each summer month of full-time effort that will be requested.

**Eleven-Month Faculty.** For department chairs under 11-month contracts, the maximum additional compensation that may be earned from all sources paid through the College payroll office is 1/11th of the employee’s base salary.

### Publication of Policy and Procedure:

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### Compliance:

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **CONSULTANTS' HOURS**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

Unless quoting a flat rate, budget narratives/justifications **must** include the following note when listing consultants' hours: *"The estimate of hours and/or hourly rates are furnished solely for the purpose of this proposal."* A similar note **must** be included in proposals that require a cost-by-task or project breakdown.

**Procedures for Implementation:**

Consultants' hours, rates, and/or hourly rates are required for proposals. Stillman College is required to maintain a record of hours of effort under any resulting award. Consultants are independent contractors and not employees or agents of Stillman College

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **FRINGE BENEFITS**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

**Policy Statement:**

Fringe Benefits are expenses directly associated with employment and apply to all College employee salaries and wages only and **must** be reflected on all proposals/applications for funding.

**Procedures for Implementation:**

All full-time salaries carry a fringe benefit rate of 23%. Part-time staff and wage payroll personnel benefits are 7.65%.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.



## POST-AWARD POLICIES AND PROCEDURES

The purpose of these policies and procedures is to help Principal Investigators (PIs) and Project Directors (PDs) become familiar with the common issues and transactions associated with post-award administration, and methods for effectively handling them. The primary goal in post-award administration is effective, accurate management of the project and project funds to facilitate grant closeout procedures.

OSP is here to assist PIs to manage external funds by:

- 1. Negotiating awards and preparing subcontracts to other institutions and organizations;
- 2. Managing and monitoring project budgets to prevent overruns;
- 3. Reviewing expenditure requests for funded projects for compliance;
- 4. Serving as a liaison between PIs and other administrative units within the College and between PIs and funding agencies;
- 5. Assuring compliance with federal, state, and agency regulations, and
- Monitoring subrecipient payments.

Financial resources are entrusted to the College for use in research, instruction, and public service. While PI(s)/Project Director(s) are responsible for administering their projects, the College is the legal recipient of sponsored agreements and ultimately responsible for activities performed under the award and the proper use of sponsor funds.

Conditions of a grant may vary. A cost transaction may be allowable for one sponsor, but unallowable for another. Therefore, each grant and contract should be treated separately when determining if a specific cost transaction is allowable.

Policy Name: **UNALLOWABLE COSTS OR COST OVERRUNS**      Approved by:

**Policy Statement:**

All unallowable or cost overruns **must** be transferred from sponsored projects.

**Procedures for Implementation:**

9905.505-40 Fundamental requirement.

(a) Costs expressly unallowable or mutually agreed to be unallowable, including costs mutually agreed to be unallowable directly associated costs, shall be identified, and excluded from any billing, claim, or proposal applicable to a Government contract.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

**Policy Statement:** Pls **must** fill out a Grant Property Disposition form and forward it to Facilities Management. The Facilities Management Office will process the disposition form into, attach a *Furniture/Equipment Form* and forward it to OSP for signature.

**Procedures for Implementation:** CFR §200.313 (1) Property records **must** be maintained that include a description of the property, a serial number or another identification number, the source of funding for the property (including the FAIN), who holds the title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property. (2) A physical inventory of the property **must** be taken, and the results reconciled with the property records at least once every two years. (3) A control system **must** be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft **must** be investigated. (4) Adequate maintenance procedures **must** be developed to keep the property in good condition. (5) If the non-Federal entity is authorized or required to sell the property, proper sales procedures **must** be established to ensure the highest possible return. (e) Disposition. When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity **must** request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions: (1) Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency. (2) Except as provided in §200.312 Federally owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair market value over \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses. (3) The Non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity **must** be entitled to compensation for its attributable percentage of the current fair market value of the property. (4) In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non-Federal entity to take disposition actions. CFR §200.306 Proceeds from the sale of real property, equipment, or supplies are not program income; such proceeds will be handled in accordance with the requirements of the Property Standards [§§ 200.311, 200.313,](#) and [200.314](#), or as specifically identified in Federal statutes, regulations, or the terms and conditions of the Federal award.

**Publication of Policy and Procedure:** This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:** Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **STUDENT STIPENDS**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### **Policy Statement:**

**(PI) must** include stipend support costs in the proposal budget at the time of proposal submission. Stipend requisitions **must** clearly reflect student ID, designation of an International or native student, project number, fund and program code, description/justification of the items, the number of units, and the cost per unit.

The stipend cost amount to be directly charged to a sponsored project **must** include the dollar amount, along with periods for disbursement.

### **Procedures for Implementation:**

**A STIPEND IS NOT A PAYMENT FOR SERVICES.** Although the payments are usually taxable income to the student, Stillman is not required to report them to the student or the IRS, nor is the College required to withhold tax on them. Students are responsible for reporting these payments and remitting any tax due. Students **must** be enrolled at Stillman College and receive a passing grade(s) for the courses in which they are enrolled during the semester they receive a stipend. The PI **must** ensure that the student is enrolled in classes and completes the semester.

Request for stipend payments on sponsored projects **must** be reviewed and approved by the OSP prior to routing to the Controller.

### **Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### **Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **GRANT EXPENDITURES**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

**Policy Statement:**

Expenditures for grants are governed by the federal cost principles and **must** conform to sponsoring agency policies, grant special provisions, and the College's internal policies.

**Procedures for Implementation:**

Stillman **must** ensure that costs claimed under grants are allowable, allocable, and reasonable. In the event Stillman anticipates charging an item of direct cost that might subsequently be disputed, an authorized Stillman official **must** discuss the matter with the sponsoring agency grants officer and document the conditions or factors surrounding the item to avoid possible subsequent disallowance.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **BUDGET MODIFICATIONS**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

All budget amendments submitted to the Office of Sponsored Programs **must** be completed and signed using the required *Budget Amendment Form*. The budget amendments may be routed through to the Coordinator's email.

**Procedures for Implementation: § 200.308 Revision of budget and program plans.**

- (b) Recipients are required to report deviations from budget or project scope or objective, and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section.
- (c) For non-construction Federal awards, recipients **must** request prior approvals from Federal awarding agencies for the following program or budget-related reasons:
  - (1) Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).
  - (2) Change in a key person specified in the application or the Federal award.
  - (3) The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
  - (4) The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with subpart E of this part as applicable.
  - (5) The transfer of funds budgeted for participant support costs to other categories of expense.
  - (6) Unless described in the application and funded in the approved Federal awards, the sub awarding, transferring, or contracting out of any work under a federal award, including fixed amount subawards as described in § 200.333. This provision does not apply to the acquisition of supplies, materials, equipment, or general support services.
  - (7) Changes in the approved cost-sharing or matching provided by the non-Federal entity.
  - (8) The need arises for additional Federal funds to complete the project.
- (d) No other prior approval requirements for specific items may be imposed unless an exception has been approved by OMB. See also §§ 200.102 and 200.407.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **HIRING GRANT FUNDED PERSONNEL**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

**Policy Statement:**

Any offer of employment **must** be approved by OSP, the Business Office, and the Office of Human Resources. Pls **should** utilize the services of the Human Resources Office before posting a position or hiring individuals to work on a grant.

**Procedures for Implementation: § 200.308 Revision of budget and program plans.**

Pls **should** utilize the services of the Human Resources Office before posting a position or hiring individuals to work on a grant.

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.

Policy Name: **INDIRECT COSTS ALLOCATION**  
College Division: Office of Sponsored Programs  
Date Revised: 01/2022

Approved by:  
Date Established: June 10, 2021  
Date Approved:

**Policy Statement:**

Indirect costs **must** always be included in a grant proposal budget unless it is an unallowable cost by the sponsor.

**Procedures for Implementation:**

Indirect costs support Stillman College and the respective academic departments, Schools, and PIs accordingly:

- 70% Administrative
  - 30% OSP
  - 40% College
- 30% Academic
  - 20% College in which grant was awarded (i.e., College of Business or College of Arts and Sciences or College of Education)
  - 10% Department in which grant was awarded

**Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

**Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.



Policy Name: **DOCUMENTING TIME AND EFFORT**

Approved by:

College Division: Office of Sponsored Programs

Date Established: June 10, 2021

Date Revised: 01/2022

Date Approved:

### **Policy Statement:**

All faculty, students, and administrative and professional employees with salaries charged to sponsored projects **must** document their time and effort attributed to a sponsored project.

All non-exempt support staff, students, and limited-duration employees paid on sponsored projects **must** document their time and effort.

### **Procedures for Implementation:**

Time and effort reporting is a federal requirement (OMB A-21 Cost Principles for Educational Institutions, Section J (10)) that ensures that the salary paid to individuals by federal grants agrees with the time and effort actually spent on the project. The Time and Effort report confirms "after-the-fact" that the salary paid matches the amount of effort charged to federally-funded activities. The reports are used in the audit process to (a) ensure compliance with the level of effort agreed to in the award document; and, (b) document any committed cost share effort. All individuals paid from either federal, or federal flow-through funds, or committed cost-share funds must complete a time and effort report each semester and return it to the Office of Sponsored Programs (OSP). In addition, Stillman College requires that the PI or PD sign a statement on the Proposal Approval Form to attest that s/he will adjust her/his effort for all Stillman College activities to ensure a total of 100% full-time effort is not exceeded.

### **Reporting Time and Effort**

Time and effort forms are sent to PIs or PDs by the Post-Award Coordinator in the OSP at the end of every semester.

The time and effort report form will include the actual percentage for both federally-compensated and cost-shared time and effort as required for each person who receives federal funds.

### **Certification of Effort**

All personnel must certify that they have expended effort on the federally-funded project for the same percentage of effort that they have been paid or have agreed to cost-share.

The PI or PD must certify the effort for other project personnel.

For personnel employed by subrecipient institutions, the time and effort of all personnel must be certified by the institution that has the subaward. The subrecipient must maintain adequate records of time and effort certification.

### **Adjustment to Actual Time and Effort**

OSP will request an amendment to the award that reflects the actual time and effort commitment of key project personnel if at any time during the project they:

- Reduce their time and effort on the project by more than 25%\*
- Are absent for three or more months from the project
- Withdraw from the project completely.

*\*For example, if the proposed effort is 25% and the individual can only commit 18% actual effort, a 28% reduction of effort (7 divided by 25) occurs and this requires prior approval from the funding agency.*

### **Time and Effort as "Cost Share"**

If the effort of a faculty or staff member is "cost-shared" on a federally-funded project, these matching funds become an obligation for Stillman College.

### **Verification of Time and Effort on New Awards**

Upon notice of a new award, OSP will verify the time and effort commitment of the project personnel with the Provost/Vice President for Academic Affairs before accepting the award for Stillman College.

### **Publication of Policy and Procedure:**

This Policy is published in the Stillman College Office of Sponsored Programs Policies and Procedures, the Faculty Handbook, and the Staff Handbook

### **Compliance:**

Compliance with the policy is mandated and failure to comply with or follow this policy may result in failure to submit the proposal.