MARIST

Office of Academic Grants Sponsored Projects Manual

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Introduction

Marist College encourages and supports qualified full-time members of the College to seek external funding in support of their own professional interests and the College's mission. These activities contribute to the continuous renewal and development of the faculty and staff, to the education and motivation of undergraduate and graduate students, and to the enhancement of the community. Recognizing that the current climate of external funding is highly competitive, the College is committed to assisting faculty and staff who actively pursue sponsored project support.

Every proposal for external funding has the potential to become a legal document that binds the College to comply with the terms required by the funding agency. When a proposal is submitted to a sponsor, the College is the legal applicant, not the author of the proposal. When an award is received, the College accepts it on behalf of the Principal Investigator. Given the high level of responsibility placed upon the applicant in adhering to the requirements related to an award, it is important for the author of a proposal to become familiar with the policies and procedures contained in this manual.

Definition of Sponsored Projects

A sponsored project or program is a signed award (grant, contract, or cooperative agreement) under which the College agrees to perform a certain scope of work, according to specified terms and conditions, for a specific budgeted financial compensation. Sponsored projects are supported by external funds awarded to the College on behalf of a full-time faculty or staff member and include one or more of the following conditions:

- commitments regarding the level of personnel effort, items of output, or achievement of specific performance targets
- specific performance or outcomes
- formal sponsor application guidelines
- restrictions on the use of funds
- a specific project period
- specified use of program outcomes or data
- required fiscal and/or technical reports
- rights to data produced
- representations regarding the College's adherence to regulations such as civil rights, lobbying, Title VII and Title IX, etc.

Excluded from this definition are:

- student financial aid
- gifts and bequests to the College
- donations of equipment or property

Unlike sponsored projects, a gift to the College is a unilateral transfer of money, property, or other assets by a donor who makes no claims on the recipient in connection with the gift. Gifts normally have the following characteristics:

- there are no reporting requirements or other deliverables.
- restrictions on use of the gift are minimal, if and maybe, designated forthe university, a unit, a program, or an activity.
- funds may be commingled with funds from other sources.

Types of Sponsored Projects

Sponsored projects fall into several general categories, which serve as a guide for the particular design of a proposed project. Specific guidelines from the sponsor may provide details for a particular program, but the determination as to what "type" of sponsored project is envisioned by the sponsor is an important early step in designing appropriate and competitive project strategies, such as goals, methods, and structure. Types of sponsored projects include:

- **Research**, involving any activity specifically organized to produce research outcomes.
- **Education and Training**, involving any activity that is part of an institution's formally organized instruction program.
- **Public Service**, involving any activity that provides noninstructional services beneficial to individuals and groups external to the institution.
- Scholarships and Fellowships, involving any scholarship or fellowship in the form of grants, trainee stipends, prizes, and awards for individuals enrolled in formal course work.

Sponsors of Funding

There are several different sources of external funding. The method of communication, format of the proposal, and representations contained in the budget and elsewhere in the proposal will vary depending upon the type of sponsor. General categories of support are outlined below.

Government

Federal, state, and local governments provide support for various sponsored projects. Examples of federal funding sources include the National Science Foundation (NSF), the US Department of Education, Environmental Protection Agency (EPA), National Institutes of Health (NIH), National Endowment for the Humanities (NEH), the US Departments of Agriculture (USDA), Commerce (DOC), Defense (DOD), Energy (DOE), and Interior (DOI). Examples of state funding sources include the New York State Department of Education and Empire State Development Corporation.

Foundations

Private, corporate, and community foundations are another source of funding support. Many foundations have very small staffs, so communicating with them can sometimes be difficult.

However, foundations can be an excellent source of funding, if applicants have innovative ideas that are consistent with the mission of the foundation. Most foundations restrict their support to very specific areas of interest, so obtaining a foundation's published annual report or funding guidelines when available can help researchers determine particular funding opportunities. Providing a foundation with a brief concept paper (e.g., two to three pages) of proposed activity is often an important first step in seeking sponsorship.

Business and Industry

Often overlooked by academic researchers, business and industry can be important funding sources. Business/industry support may include cash funding and/or in-kind contributions of expertise, service, equipment, or materials. Not only can business/industry provide support or partial support for a new project, but academic-business/industrial partnerships can also establish a basis for seeking additional funding from federal agencies or other sources, especially those requiring or rewarding such partnerships.

Proposals to businesses often originate with the proposer. When guidelines do not exist, extensive communication with the business/industry representative is crucial in determining project goals and expectations. Proposals are often much shorter and simpler than those submitted to federal agencies, although the resulting legal agreement can be quite complex. Business/industry agreements often contain special clauses covering such things as publication rights, patents, nondisclosure of proprietary information, and indemnification.

Types of Proposals

Any proposal, whether solicited or unsolicited, must obtain prior approval before submission to a sponsor. (See <u>Procedures for Proposal Processing and Submission</u>.)

Solicited Proposals

A solicited proposal is an offer submitted in response to a request by a sponsoring agency for research or other services on a specified subject. Government solicitations are typically in the form of a Request for Quotation (RFQ), Request for Proposal (RFP), or a Request for Application (RFA). A solicitation is a full statement of the work to be performed and may include the requirements of the proposed agreement, including terms and conditions. The proposal can be accepted by the sponsor to create a binding agreement either following negotiations or without discussion. Special consideration should be given to a solicitation's terms and conditions. It is important to provide the Academic Grants Office with a copy of the solicitation well in advance of the proposal deadline. There may be budgetary requirements and/or limitations such as total project cost, percentage of effort, equipment needs, explicitly restricted budget categories, required travel, Facilities and Administrative (F&A) cost limitations, period of performance, or cost-sharing. Adhering to the solicitation's guidelines is crucial, as a specific budget format and level of budgetary detail and/or justification may be required.

Unsolicited Proposals

An unsolicited proposal emanates from the initiative and imagination of the principal investigator. However, its realization as a formal request to a sponsor for support is subject to several factors that should be explored. The principal investigator should ascertain, primarily through preliminary inquiries, the degree of interest sponsors have in supporting the proposed work and the extent to which they can do so financially. The format suggested under Letters of Inquiry and Pre-Proposals is typical of most unsolicited proposals. However, the principal investigator should check with the Academic Grants Office to determine if the sponsor has specific forms and instructions for proposals that need to be used. (See Contacting Sponsors for strategies on dealing with corporate sponsors.)

Basic Types of Sponsored Project Agreements

The type of sponsored project award **grant**, **contract**, or **cooperative agreement** is an indication of general program requirements regarding the sponsor's role in the program, the Principal Investigator's responsibilities, the nature of expected outcomes, the payment method and schedule, and the use of program results or data. The particular program requirements for each sponsored project are specified in the award document.

Grants

Generally, the grant mechanism is used when the sponsor is not seeking immediate benefit for itself but is simply providing support for work initiated by the principal investigator. At Marist, all faculty grants are supported and approved for submission through the Office of Academic Grants. (See Sponsored Projects Administration.) As a general rule, grants contain fewer restrictions than do contracts or cooperative agreements. Grant recipients make guarantees that work will be done as described in the proposal and good final management practices will be followed. The proposal incorporates the conditions outlined in the sponsor's guidelines, and the sponsor will typically not impose further restrictions. The sponsor expects to receive reports, but not to supervise the program, and usually does not place limitations on the use or publication ofprogram results.

Grants are generally made for a specific period, often for multiple years. However, the granting sponsor usually disburses funds on an annual basis. The Principal Investigator may be required to submit a continuation application as each subsequent grant year approaches in order to report program activity and assure the agency that the work is being performed in accordance with the plan outlined in the original proposal. Usually, a grant renewal, as opposed to a continuation, requires submission of another proposal that is competitively peer reviewed.

Contracts

While all sponsored project agreements are contracts, sponsors commonly use the term "contract" to refer to an agreement for the procurement of products or services. The contract establishes an agreement between the sponsor and recipient to acquire, by purchase, lease, or barter, property or services for the direct benefit of the sponsor. Generally, contracts specify deliverables within a specified project period. Almost always, these deliverables are tangible items and/or services rather than basic research or project outcomes. Contracts are consequently much more formal and specific than grants.

Through contracts, a sponsor stipulates its needs, and the recipient and the sponsor come to an agreement. The process sometimes involves bidding and competitive negotiations. Strictly speaking, contracts do not have a principal investigator. Instead, a proposer describes a work plan and the costs needed to produce a product or service.

Contract negotiation is more likely to involve discussion of proposed provisions restricting the publication or other use of research data, or Clauses affecting potential patent rights and licensing agreements may also be included. Contracts also can require frequent and detailed reporting. In a contract arrangement, the sponsor is actively involved in overseeing the progress and direction of the project. It is recommended that applicants attend a bidder's meeting with government representatives before writing a government contract proposal.

Contracted Corporate Support

Contracted corporate research or services are somewhat different from that for grants. Most contracted corporate research is the result of independent faculty contact with colleagues and former students in industry. Several aspects of corporate contracting are different from government grants program. For instance, there is usually no formal peer review of proposals, and considerably fewer regulations and restrictions are placed upon principal investigators in the pursuit of their research. Corporate funded research projects must focus on the research needs of the sponsor.

Cost-reimbursement Agreements

A cost-reimbursement agreement provides payment for allowable costs incurred in the performance of the agreement, to the extent prescribed, and establishes estimates of total cost for the purpose of obligating funds and establishing ceilings that Marist may not exceed. A cost-reimbursement agreement is used when the uncertainties of performance are such that costs cannot be estimated with enough certainty to permit use of a fixed-price agreement.

Fixed-price Agreements

Fixed-price agreements set a firm price for the sponsor for which the contractor (e.g. Marist) bears full responsibility. A definite price is agreed upon before the award, and the price remains fixed for the life of the agreement and is not subject to further adjustment. Fixed-price agreements are generally used when reasonably definite specifications, either functional or detailed, are available and when fair and reasonable prices can be estimated and established.

They are often used when dealing with corporate sponsors. Such a proposal specifies a set or "fixed" price for a performance of work on an agreed set of specified deliverables, but does not contain details of the budget. The detailed budget is kept internally by the College for cost accounting purposes only. In these types of agreements, sponsors agree to the scope of the work to be performed, with an agreed upon value, but provide no details of how the funds are to be spent on personnel, supplies, equipment, travel, or facilities and administrative costs. Further, in such fixed-price agreements, should any funds remain at the conclusion of the project, the residual funds may be retained by the College. Cost overruns, however, are not reimbursable.

Such agreements are usually more restrictive in nature than cost reimbursement agreements, and are tied to a specific task-oriented work statement. Because a strict limit is imposed on spending, special care is needed when preparing the budget to ensure that the College is in the best possible position to fulfill its proposed obligations. It is especially important to ensure that all reasonable costs are included, since the sponsor is unlikely to reimburse any additional or unforeseen expenditures.

In both fixed-fee and cost-reimbursement contracts, prior approval from the sponsor is required to increase the amount of the award.

Subcontracts

A subcontract is a written agreement between Marist College and a third party, sometimes issued under a sponsored project agreement to procure substantive programmatic effort. A subcontract generally involves services of a relatively long period (a year or more), compared to a consulting or independent contractor agreement which is typically used to hire an individual to perform a specific service of short duration. Subcontracts, like contracts, may be either fixed-fee or cost-reimbursement arrangements. Subcontract proposals are treated in the same way as any other proposal to an off-campus sponsor. (See Procedures for Proposal Processing and Submission and Consortium/Partnership Submissions.)

Cooperative Agreements

An agreement that combines elements of both a grant and a contract is known as a cooperative agreement. In a cooperative agreement, as with a grant, the sponsor is not seeking immediate benefit for itself (though it may expect to see "immediate benefit" for another entity). As with a contract, the sponsor expects to have some involvement in the project.

Proposal Development

Sponsored projects vary significantly according to the types of funding sources, the types of projects funded, and the types of sponsored project awards, but whatever the nature of the individual project, successful application for and management of sponsored projects require the coordinated efforts of individuals and departments throughout the College.

The Academic Grants Office can help locate funding sources, secure application forms, and assist in the completion of the application. The office subscribes to a variety of publications and databases on funding priorities for federal and nonfederal sources.

These are some steps that faculty and staff should take before looking for a sponsor.

- Survey the existing literature on the proposed topic. What have others already done and what are they currently doing? Be able to explain how the project idea will contribute to existing knowledge.
- Decide how the project links to long-term research, professional, organizational goals.
- Determine how long the project will take. What will the timetable look like?
- Make sure that the project is doable. Do the appropriate resources exist at Marist College to support the project? Who else will need to participate?
- Read the <u>Procedures for Proposal Processing and Submission</u> section of this manual.

Answering these questions before beginning the proposal process will prevent spending time on an unfundable project and will help to prevent any unnecessary surprises or snags along the way.

Depending upon the type of sponsor, the format of the proposal and the time required for proposal development will vary. The budget categories outlined in this manual are used as a guide in developing all budgets for sponsored projects. Unless required by the sponsor, a detailed budget need not always be submitted to the sponsor; however, all proposals are required to have a complete budget that can be routed for approvals during the internal review prior to the proposal submission to the sponsor. Sponsor guidelines should be followed verbatim if available.

Finding a Sponsor

Finding a sponsor that has an interest in a particular project among all the possibilities can be a daunting task. The Academic Grants Office can help streamline the process by helping faculty find a potential sponsor for a noteworthy idea. Through electronic sources, the Academic Grants Office assists faculty with funding searches.

The College subscribes to two electronic databases containing thousands of sponsors: Sponsored Projects Information Network (SPIN), an online database of funding opportunities - federal, nonfederal, and corporate that can be used for identifying funding for research, education, and development projects, and The Foundation Center's Database can be found on https://fconline.foundationcenter.org/. These databases are comprised of thousands of potential sponsors. Automatic search results from SPIN can also be e-mailed daily to faculty. Faculty and staff interested in obtaining e-mail alerts on funding opportunities are encouraged to register. The Office of Academic Grants can assist with this process.

Contacting Sponsors

Once a sponsor is identified, it is usually appropriate to make contact with the sponsor. Essentially, this initial contact is to let the sponsor know about the project idea and to find out if it is worthwhile to submit a proposal. Some sponsors have staff that are researchers themselves and can give some helpful input on the project.

Some agencies prefer to be contacted in writing; others can be contacted by phone or e-mail. Most foundations discourage phone calls and prefer a letter of inquiry. (The agency information will usually suggest its preferred method.) A letter of inquiry should consist of one-two pages, and should include concisely all information in the proposal outline.

Dorin Schumacher's classic book titled *Get Funded: A Practical Guide for Scholar Seeking Research Support from Business* (1992) is an excellent resource for faculty seeking strategies for funding and contacting corporations. She suggests the following activities to get started:

- At professional meetings, make it a point to seek out people from companies.
- Collect participant's lists from previously attended meetings; check all corporate names.
- Get to know any corporate people on the committee you serve on.

- Get information from professional associations about any committees that have both university and corporate members. Ask for lists of committees and members. Call up the chair(s) and ask to be put on the committee of choice.
- Register with industry liaison offices; give them descriptions of current research interests; ask for names of potentially fruitful corporate contacts.
- Ask the departmental secretary for an alphabetical-by-place of employment listing of all departmental graduates. Check names of companies.
- Talk with colleagues about the companies they work with or know about. Ask about company interests.
- Meet with Marist's director of Center for Career Services. Ask for a
 list ofcompanies that recruit on campus and a schedule of visits for
 the semester. Check the ones you would like to know more about.
 Senda memo to a director, requesting that arrangements be made for
 you to meet with the recruiters from those companies when they
 come to campus.
- Get to know the corporate people supervising students. Call them up and discuss possible placements. Offer to visit them; invite them to visit you.
- If you are teaching continuing education courses for companies or company employees, make it a point to get to know students from companies you think you would have an interest in.

Preliminary Inquiries

Some type of informal communication, either a telephone call, personal contact or written correspondence, should precede submission of the full proposal. A preliminary inquiry permits the sponsor representative to examine the idea for consistency with the purposes and priorities of the sponsor. This can save the principal investigator (PI) time and effort if the sponsor is either not interested or the project is ineligible for funding under the terms of a particular program. Frequently, in the latter case, other programs or agencies may be suggested to the PI.

Letter of Inquiry and Pre-Proposals

Some sponsors, especially foundations, require a letter of inquiry. Certain government sponsored projects require letters of intent or pre-proposals prior to submission of a formal proposal, but most do not. Nevertheless, a letter of inquiry is an effective way to initiate contact with public and private sponsors.

Unlike formal proposals, there is usually no required format for preliminary inquiries. However, they should be short, preferably 2-5 pages, and include the following:

- 1. TITLE Select an appropriate, concise but descriptive title, suitable for indexing.
- 2. STATEMENT OF THE PROBLEM/PROJECT At the preliminary stage this is the most important section and it should:
 - a. demonstrate a precise understanding of the problem or need;
 - b. indicate the project's relationship to a larger set of problems and justify why this particular focus has been chosen;
 - c. establish the importance and significance of the problem, especially to a national audience;
 - d. signify the potential generalizability and contribution of the project;
 - e. establish a theoretical or conceptual base for the project; and justify why the problem should be of interest to the sponsor.
- 1. PROJECT OBJECTIVES & METHODOLOGY This should be a brief description of the research design or approach to the problem, emphasizing any innovative features and a schedule for the project.
- 2. BUDGET Costs should be calculated precisely, but only major budget categories should be included at this time. Also, major items of equipment or other unusual expenditures should be included and justified, if they are critical to the project. (The Academic Grants Office should be involved in developing the preliminary budget to assure that it follows Marist and sponsor budget guidelines and is not significantly different from the budget submitted with the formal proposal.)

3. CURRICULUM VITAE - Only a brief vita should be included to identify the principal investigator.

Proposal Format for Solicited Proposals

In the absence of any instructions or a required format, the following format is recommended for solicited proposals that do not have published guidelines:

Title PagePersonnelAbstractDisseminationTable of ContentsContinuationIntroductionReferencesLiterature ReviewBibliographyProject DescriptionBudgetEvaluationAppendices

Title Page

Many sponsors have their own self-explanatory format for a title page. In the absence of a required format, the page should include the name, title, address, phone number and email of the principal investigator or project director, a descriptive project title, and date of submission.

Facilities & Equipment

Abstract

Every proposal should include an abstract, which is a concise summary (approximately 200 words) of the project's major objectives, and procedures to be used and its significance. Prepared after the proposal is written, the abstract is designed to give the reviewer a quick overview of the project and should be on a separate page at the beginning of the proposal.

Collaborators

Table of Contents

The table of contents is prepared for the convenience of the reviewer if a proposal has many sections. List only the major sections of the proposal and give page numbers where each section begins. If a proposal is very long, the table of contents may be supplemented with a list of illustrations, figures, or tables.

Introduction

An introduction is needed only in very long, complex proposals. The introduction should assist the reviewer -- often the initial administrative reviewer, who may direct the proposal to the sponsor's proper study section -- in grasping the full significance of the proposed project. Therefore, the introduction should be clear to an informed layman. It should place the project problem in a context of common knowledge and show the importance of the project.

Literature Review

The problem or need posed and methods for addressing it must be substantiated by the literature. This is the section where the principal investigator illustrates knowledge of and credibility in the field. Citations of relevant work as well as dissenting viewpoints should be used to demonstrate knowledge of the most recent work or findings in the field. Since it is possible that the proposal could be reviewed by someone who has published in the field, omission of pertinent references can have negative results. Citations should be compiled in a bibliography at the conclusion of the project narrative.

Project Description

The project description is the heart of the proposal and should be prepared with special care. It should be a comprehensive explanation of the proposed project, not addressed to lay people but to specialists in the field. This section may be broken down into four subparts -- problem or need, significance, objectives, and plan of work.

1. Problem/Need -- A proposal is generally accepted to be an identification of a problem and a solution, or plan, that will solvethat problem. With this in mind, the beginning of the proposal should define the need or problem that the project will attempt to solve and explain how the proposed approach will build upon other efforts. Citing other sources, statistics and studies can be an effective way of emphasizing the significance of the problem or linking projects to a larger issue or national need. The problem statement should relate to the larger goals of the sponsor.

- 2. Objectives -- With a problem or need defined, the next section of your narrative should explain the objectives to be reached in solvingthis problem. Objectives should not be expressed as merely a goal, but as a definable project outcome. They can include changes in behavior, changes in performance, changes in a process, or some other sort of tangible result of the project. Objectives should answer the following questions:
 - o Who?
 - Is going to do what?
 - o By when?
 - o To what degree?
 - As measured by what?
- 2. Plan of Work -- This section should include a broad design of the work to be undertaken and detail methods and procedures. The plan of work should reinforce the budget requested. Management and staffing plans are also critical components for projects involving multiple investigators and/or collaborations with investigators at other institutions. A timeline can be a very valuable tool to help the reader see exactly what will be done. This is always an excellent addition to any narrative.

Evaluation

This is often an overlooked component of a proposal. Most sponsors require a plan for evaluating the outcome of your project. This section should detail who will be responsible for the evaluation, the design and method of the evaluation, and the data to be collected or documented. Make sure that the evaluation is effectively measuring the objectives described earlier.

A poorly structured evaluation plan, or a plan that does not properly measure the extent to which objectives will be reached can be the demise of anotherwise excellent proposal. Regardless of who does the evaluation, it should indicate:

- 1. Who will perform the evaluation
- 2. How evaluators will be selected
- 3. Evaluation criteria

- 4. Data gathering instruments
- 5. Any test instruments or questionnaires
- 6. Data analysis process
- 7. How the evaluation will be used for program improvement
- 8. The evaluation reports to be produced

Facilities & Equipment

Available facilities and special equipment that will be important to the project should be described. Any additional facilities and equipment to be acquired under the project, either by the College or the sponsor, should be described in detail. The importance of these items to the success of the project should be made clear.

Personnel

This section should identify the principal investigator, co-investigators, the number of students and support staff, and briefly describe their roles in the project. The biographical sketch for each key project person should be on a separate page and should include name, education, experience, professional affiliations and honors, and list of publications published in the past five years as well as those in press.

Dissemination

Most sponsors want to know that the results of your project will be disseminated and expect a plan for dissemination to be included in the proposal.

Commonly used strategies are newsletters, books and articles, conference presentations and workshops, pamphlets and websites. Since these approaches have become so common, also consider demonstrations of your project, agreements with other agencies to produce or market your results, filing project documents with a national clearinghouse, or including national organization in project so they can later become advocates for the project and assist in dissemination.

Continuation

Sponsors are more likely to fund a project that will not terminate on the same day that funding ceases. Some proposals need to include plans for the continuation of the project after funding has run out. Will the project be supported on a fee-for-service basis? Will the College be able to sustain the project? Can the financial responsibilities be transferred to another organization after the conclusion of this sponsor's funding?

References

If three or fewer references are cited, they may be included as footnotes in the text itself. If greater than three, they should be indicated by sequential footnotes in the text. Standard footnoting style should be followed.

Bibliography

This section is optional, but can serve the purpose of informing the reviewer that the principal investigator is familiar with pertinent literature in the field beyond that is cited in the proposal. Standard bibliographic format should be followed.

Budget

See <u>Budget Considerations</u> and <u>Budget Categories</u>.

Appendices

Appendices may be used to include data of peripheral benefit to the research (e.g., reprints of articles, subcontract data, letters of support, tabular data, and graphs). The use of appendices is recommended, particularly when a sponsor limits the length of the proposal to a specified number of pages. However, many sponsors do not allow appendices and even when allowed may not copy them when circulating proposals to reviewers. Therefore, any information essential to the proposal should be in the narrative.

Collaborators

Sponsors like collaborative proposals because they know that their dollars will impact more than one institution. However, lines of responsibility must be clearly delineated and letters of commitment included in the proposal package. This shows the sponsor that the partner is serious.

Because partnerships generally impact the budget, a separate budget for each partner must be incorporated into the proposal budget. If funded, a subcontract arrangement will be made to transfer funds from Marist College to the partner institutions.

Budget Considerations

The budget is an indicator of the magnitude of the project and serves to identify the cost of the project to the sponsor. The budget also serves as a further measure of the principal investigator's (PI) capabilities since there must be a reasonable correlation between the project as described and the PI's assessment of the various cost elements. Budgets that are too high or too low can alert the reviewer to the possibility that the PI does not have a realistic grasp of project needs.

The budget should reflect total costs (direct and facilities and administrative costs). While preparing the technical proposal, the PI should work with the Academic Grants Office to begin estimating costs. It is essential that a budget be drafted early in the proposal development stages so that assistance can be provided by the Academic Grants Office and unnecessary delays in processing the proposal avoided.

A proposal must include an estimate that reflects the cost required to perform the work and a corresponding budget justification. If a proposal requests support for a multi-year project, annual budgets and a summary budget are usually included. Many sponsors provide guidelines and budget forms. Budgeting details and requirements vary considerably depending on the sponsor and type of proposal.

Budget Cost Principles

The Office of Management and Budget (OMB) provides guideline that describe the cost principles for all sponsored agreements. Under these principles, all costs charged to sponsored agreements should conform to the principles of reasonableness, allocability, consistency, and allowability as well as any specific conditions stated in the agreement. OMB define these principles as follows:

- Reasonableness: A cost is considered reasonable if the nature of the expenditure and the amount involved reflects the action that a prudent person would take under the circumstances.
- Allocability: A cost is allocable if it is beneficial to the project.
- Consistency: Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or facilities and administrative (F&A) costs. The method used to estimate, record, and report costs must be consistent.
- Allowability: Costs must be allowed with OMB principles and terms of the sponsored agreement.

Distinction between Direct and Facilities and Administrative (F&A) Costs

Direct costs are expenses that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity; or can be directly assigned to such activities relatively easily with a high degree of accuracy. Direct costs include salaries, wages and fringe benefits for all personnel involved; equipment; travel; supplies and expenses; consultant services; other contractual services; participant support costs; and subcontract costs. Facilities and Administrative costs (F&A), which also are known as indirect costs, are usually divided into the following categories of supporting activities: 1) Sponsored project administration personnel and other costs of offices whose responsibility is the administration of sponsored projects; 2) Departmental administrative expenses administrative costs at the departmental or organization level; 3) General administrative and general expenses accounting, payroll, and other administrative offices; 4) Plant operation and maintenance utilities, custodial services, maintenance and repairs; 5) Library expenses library resources and staff; 6) Depreciation or use allowance for buildings and equipment; and 7) Information Technology, including computing costs, telecommunications, networking, and other information services.

Both direct and F&A costs are real costs. If sponsors of projects do not fully reimburse either the direct or indirect costs, these costs must be paid from other College funds. As a result, through reimbursement shortfalls or audit disallowance, other areas may be short-changed to accommodate sponsored projects that are not fully reimbursable.

The F&A cost rate, which is an accounting mechanism used by colleges and universities to recover costs that cannot be readily associated with specific projects, applies to all sponsored projects administered by the College. The process for recovery is a reimbursement of actual expenditures, calculated in accordance with OMB cost principles. The College is subject to government internal and external audit of supporting data for every year. The F&A cost rate is an average of all F&A costs incurred for all federal and non-federal funded projects. (See Facilities and Administrative (F&A) Costs.) Thus, all project budgets must include the maximum amount of F&A costs that the sponsor will allow according to the sponsor's written policies and procedures. Unrecovered F&A costs are represented as a Marist College cost share. OMB states that the salaries and wages of administrative and clerical staff, and non-salary items such as postage for routine correspondence, local telephone calls (including equipment), and office supplies are normally treated as F&A costs. These costs qualify as direct costs only when their purpose is for the sole direct benefit of the project and the nature of the performed work constitute a major program or activity.

All costs must be specifically identified and justified in the proposalsbudget or budget justification section.

Unallowable (nonrecoverable) Costs

Expenditures for which Marist may not, by regulation, request reimbursement, either in whole or in part, from the federal government are considered nonrecoverable or unallowable. When preparing a budget, the following costs are nonrecoverable and should be excluded:

- Advertising or public relations: Expenditures to promote the College are nonrecoverable. This includes non-technical newsletters, department publications, and advertising in excess of what is ordinary and necessary. (Advertising for the disposal of surplus materials or for employment positions is allowable).
- Alcoholic beverages
- Alumni activities
- Bad debts
- Commencement and convocation costs
- Donations or contributions
- Development/fundraising costs

- Entertainment costs: Costs of entertainment (e.g., tickets to shows or sporting events, meals, lodging, rentals, transportation, and gratuities) are nonrecoverable. However, business meals (those necessary to carry out the unit's mission) are recoverable with proper documentation and justification. All attendees who claim federal reimbursement must have contributed to the business purpose. Proper documentation includes the date, location, food costs (with an itemization of any alcoholic beverages), attendees, and business purpose. This documentation is also required for Internal Revenue Service purposes. When the number of attendees is large, it is sufficient to name the group rather than each participant (e.g., 50 science faculty).
- Excessive employment recruitment costs (e.g., color advertisements)
- Fines and penalties
- Goods or services for personal use (including gifts)
- Housing and personal living expenses
- Investment management costs
- Lobbying costs
 Memberships (including airline clubs)
- Moving costs (if the employee resigns within 12 months)
- Student activity costs (those activities normally directed by students)
- Travel costs in excess of commercial coach airfare. Costs in excess of the lowest available commercial coach fare are normally nonrecoverable. Exceptions may be granted if unreasonable travel arrangements would result when traveling coach, if the upgrade would decrease the cost, or if it is required to meet the medical needs of the traveler. In order for excess airfare costs to be recoverable the institution must justify and document, on a case-by-case basis, the applicable condition(s), and when required, obtain the sponsor's approval.
- Trustee travel

Cost Sharing or Matching Funds

Cost sharing or matching is that portion of the costs, direct or indirect, not borne by the sponsor. Some sponsors require an institutional cost-share, or matching funds, from the institution. Cost sharing is either mandatory (required by statute or program requirements as a condition of award) or voluntary (offered by the grantee).

Many sponsors require cost sharing in the proposal budget or indicate that it is recommended. When cost sharing is recommended it usually means that it will be a factor during proposal evaluation. Cost-sharing requirements may be in the form of a specific ratio or stated percentage. The source and categories of the proposed cost-sharing commitment should be clearly cited in the budget justification.

Items generally cost shared include:

- College funded salaries and wages of the principal investigator and staff directly engaged in the sponsored project, including applicable fringe benefits and F&A costs
- Donated equipment or supplies
- Unrecovered F&A costs (the difference between the full, allowable F&A costs calculated at the current negotiated rate and the reduced F&A costs reimbursed by the sponsor). Prior authorization may be required by some sponsors to use F&A costs as cost sharing. For internal budgetary purposes, unrecovered F&A costs will be calculated as a cost share.
- Third party in-kind or cash contributions

Items not generally allowed for cost-sharing:

- Costs incurred prior to the award
- Cost overruns
- Program income earned under an award unless authorized by the sponsor

Federal funds cannot be used as cost share on federal awards. Also, cost sharing funds, whether internal or third party, may not be used to meet more than one cost sharing requirement. Federal awards must also conform to other provisions as stated in the OMB Uniform Guidance and/or the sponsored agreement.

When an award results from a proposal that was submitted with cost sharing commitments, whether mandatory or voluntary, the cost sharing commitments generally become an auditable condition of the award, and therefore, must be documented.

Distinction between Consulting and Employment Relationships

Consultants are independent contractors and not employees of the College. They are hired to perform a specific service for a relatively short duration. Marist College employees are not considered consultants when working on Marist College projects.

Consultants

- may be individuals or firms
- may provide identical services to others as part of their primary business
- provide expertise vital to the project, but do not have authority over the direction of the project
- are provided with specifications defining their contribution to the project rather than a statement of work requiring discretion

Consulting agreements are contracts that bind both the consultant and the College. It is important to distinguish between consulting and employment relationships established on behalf of the College. Through consulting agreements, the College can complete work that cannot be done by its own personnel without acquiring any additional responsibility or liability beyond that established in the contract. However, improper consulting arrangements that establish employment relationships under the guise of a contract impose on the College full employer responsibilities under the law.

The primary difference between employment and consulting on which the Internal Revenue Service bases its enforcement of employer's withholding and reporting obligations, is the degree to which a proposed service arrangementwill allow control of the work effort.

Consortium/Partnership Submissions

Incorporating a Subcontract into a Marist Proposal

On occasion, subcontracts are budgeted when a portion of the required effort needs to be provided by one or more other entities (third parties) for a discrete part of the project. When the portion of effort being performed by a third party constitutes a significant component of the sponsored project, then the third party will be required to provide the resources necessary to conduct that portion of the effort as an independent contractor. Costs associated with the subcontract or normally include salaries and wages, employee benefits, supplies, equipment, travel, consultants, subcontractors and other direct costs as stipulated by the subcontractor as part of its proposal to Marist College. Greater itemization of categories may be needed if required by the prime agreement. Facilities and administrative costs should be included and should be calculated using the subcontractor's current rate(s). In the profit sector, it is not uncommon for the subcontractor to include costs such as labor overhead, material overhead, general and administrative expense, cost of money, and a profit or fee.

If a collaborative or subagreement with another institution is proposed, Marist requires a budget and letter of commitment signed by an authorized organizational representative from the partner institution. At the proposal development stage, Marist's Director of Academic Grants works with the sponsored projects office or business office and PI at the partner institution to facilitate the completion of this documentation and confirm fringe benefit and indirect cost rates. If the institution has a federally negotiated indirect cost rate, a copy of the rate agreement is requested. If not, the *de minimus* indirect cost rate of 10 percent is used. The signed letter of commitment and budget from the partner institution is included as part of Marist's proposal routing and approval process. Marist institutional approvals must be obtained before an application can be submitted to the funding agency. The Marist Business Office is part of this internal approval process and the Office of Academic Grants works closely with the Business Office throughout the proposal development stage.

It is the responsibility of Marist College and its Principal Investigators to comply with procurement requirements of the sponsor in selecting a subcontractor. There are two methods of selecting a subcontractor: competitive bidding or sole source procurement. Regardless of who the subcontractor is or the method used in selecting a subcontractor, there must be adequate time provided between the receipt of a subcontractor's proposal and the sponsor's proposal due date, to allow the Marist PI sufficient time to discuss and negotiate the statement of work and obtain internal approvals from Marist and the subcontractor.

If the proposed subcontract involves human subjects or animal experimentation, appropriate subcontractor compliance to their policies may need to be included with the proposal.

In any case, the subcontractor's proposal must be signed by a designated official who is authorized to commit the subcontractor's resources to the completion of the project.

Collaborative efforts with other Marist departments are not considered subcontracting arrangements. Each Marist employee must be written into the budget proposal as an employee, not as a subcontractor.

Marist as a Subcontractor in Proposals Submitted by Other Institutions

Marist College faculty may submit proposals that are portions of a larger proposal being submitted by another institution or group of institutions. Marist College is then technically a subcontractor. Through a partnership with the lead submitting institution(s), the Marist College Principal Investigator has obligated himself or herself and the College to completing specific work related to the total project. Principal Investigators need to follow the same internal routing process as they would for a grant or contract submitted by the College because a subcontract represents a Marist College application. Therefore,the internal submission and review process is the same and Marist College's current fringe benefits and Facilities and Administrative (F&A) rates must be included in the budget. Budgets are subject to the same cost principles described in the Budget Considerations above.

Because collaborative proposals can become complicated. Principal Investigators should contact staff at the Academic Grants Officeearly on in the proposal development process (see Proposal Development Timeline).

Future-Year Projections

Costs for periods beyond the current year are called future year projections. Factors to consider in projecting future costs include project time frame, salary increases, inflation, and vend or quote projections.

Program Income

Some sponsored projects may generate income. Program income includes: income from fees for services performed; the sale of commodities or items fabricated under an award; license fees; royalties on patents and copyrights; and interest on loans made with award funds. Interest earned on advances of federal funds is not program income. Except when otherwise provided in federal awarding agency regulations or the terms and conditions of the award, program income does not include the receipt of principal on loans, rebates, credits, discounts, or interest earned on any part thereof. Some sponsors require a projection of program income and its intended use at the proposal stage.

When working with a federal prime sponsor and the contract or any resultant modifications to the contract are expected to exceed \$500,000 (\$1 million for construction projects), Marist is required to submit a subcontracting plan. A small and disadvantaged business subcontracting plan is a method by which Marist separately addresses the requirements (in terms of participation and goals) of subcontracting to small, disadvantaged, and women-owned businesses.

When submitting to a New York State sponsor, Marist is required, to the extent possible, to utilize women- and minority-owned businesses as subcontractors.

Budget Categories

Direct Costs

With the exception of cost sharing or matching commitments, the principal investigator is expected to request sufficient funds from the sponsor to cover all the direct costs that will be incurred during the conduct of the project.

Salaries and Wages

Compensation for personal services covers all amounts currently paid or accrued by the College for employee services rendered during the project period. The budget should reflect the estimated percentage of effort (versus hours or months) for professional staff and faculty who will work on the project. Overtime pay eligible staff may be budgeted by providing estimated hours. New positions should be budgeted in accordance with the compensation levels and job classifications published by the Office of Human Resources.

The costing detail should include names of senior project personnel and the titles and percentage of effort for all project personnel. Part-time employees should be identified as either temporary help, clerical help, or students. Percentage of effort for nine-month faculty should be shown separately from summer support.

Academic-Year Salary

Faculty salary figures should be based on a percentage of estimated effort and budgeted at current salary levels plus reasonable annual increases. Faculty may budget a portion of their academic-year salary directly to sponsored projects.

The salary charged to an agreement during the period of the individual's full-time appointment should not be considered as extra compensation. If release time is granted by the institution for the purpose of the proposed agreement, then the funding requested goes to Marist to cover the costs of hiring adjunct faculty and other costs associated with the release of a faculty member.

Summer Salary

Faculty on nine-month appointments may receive additional salary during the summer months up to a maximum of three-ninths of their academic year salary. Summer salary funded by the National Science Foundation (NSF) for faculty on a nine-month appointment is limited to two-ninths of their regularacademic year salary. This limit includes summer salary received from all NSF-funded agreements. The individual must be working on the project while receiving summer salary. Vacation during this period is unallowable. Additionally, nine-month faculty hired to teach full-time during the summer are ineligible to receive additional salary from sponsored agreements during the period of time they are teaching.

Sabbatical Supplements

Faculty who take a nine-month sabbatical at half pay may wish to recover all or a portion of the remaining amount of their salary from a sponsored project. Some sponsors will provide academic year supplements to cover all or part of the salary lost during a sabbatical.

Emeritus Faculty Salary

Emeritus salaries are based on the individual's last regular salary plus reasonable annual increases.

Visiting Academics

If the visiting academic is a faculty member at another college or at Marist College, the appointment should be made at the same professorial level they currently hold. The title "Visiting Fellow" should be used if the individual does not currently hold a professorial title. Budgeting for visiting academics should be consistent with departmental appointments and based on the rank of the visitor, plus reasonable annual increases.

Other Professionals

Individuals included in this category are research and extension associates, technicians, computer programmers and analysts, and academic or extension support aides or specialists.

These positions should be budgeted at current salary levels plus reasonable annual increases. Figures should be based on a percentage of estimated effort.

Administrative and Clerical Staff

Staff responsible for providing coordination and support in the areas of administration, secretarial, personnel, business and/or facilities of an office, department, program, or unit are considered administrative and clerical staff. Direct charging of administrative/clerical salaries on federally supported sponsored agreements is restricted by OMB because they typically treated as F&A costs. The direct charging of these costs may be appropriate for a major project or activity when individuals budgeted are specifically identified for that project or activity for administrative or clerical services and the individuals involved can be specifically identified with the project or activity.

If a principal investigator (PI) budgets administrative/clerical salaries, they must be separately itemized with a justification detailing the job duties so they are easily identifiable and assignable to the project with a high degree of accuracy. These positions should be budgeted at current salary levels plus reasonable annual increases. Budget figures should be based on a percentage of estimated effort.

Graduate Student Salary

Graduate student hourly wages are established by the Office of Financial Aid and are excluded from the employee benefits calculation. Graduate students may receive tuition reimbursement for work on a sponsored project. The tuition portion includes tuition remission and other forms of compensation paid as, or in lieu of, wages and should not be included under salary and wages.

Student Wages

Undergraduate students are budgeted at an hourly rate based on their level of expertise and prior experience. These wages are established by the Office of Financial Aid.

Temporary Personnel

Temporary personnel are budgeted by hourly rates that are consistent with the minimum salary levels established by the Office of Human Resource Services and appropriate to the required level of work and experience.

Fringe Benefits

Fringe benefits are direct costs to the College and depending upon the terms of employment, may include employer costs of retirement, Social Security, workmen's compensation insurance, unemployment compensation insurance, and health and other insurance coverage. Employee benefits are part of real employment costs and must be included in a budget. Benefit rates are calculated annually and take effect each July 1.

Benefits for salaries and wages should be calculated at the current rate. Benefits based on salary estimates for future years or for single year projects that overlap Marist's fiscal year should be calculated at projected rates. To determine the appropriate rate and the formula for calculating fringe benefit rates, contact the Academic Grants Office.

Equipment

The capitalization threshold for all items of equipment with a useful life of more than one year is \$5,000. That is, each unit cost must be at least \$5,000 and the equipment must have a useful life of more than one year. Equipment is subdivided into two classifications: special purpose and general purpose.

Special Purpose Equipment

As a rule, special purpose equipment is considered to be that which is necessary and is strictly limited for use by the activities of the sponsored project, and is unlikely to be available within the College.

General Purpose Equipment

General purpose equipment is equipment that is not limited to activities specified in the sponsored agreement (e.g., office equipment and furnishings, air conditioning equipment, reproduction and printing equipment, motor vehicles, and data processing equipment). Expenditures for general purpose equipment, buildings, and land are unallowable, except where the equipment is primarily for the sole benefit of the project and the expenditurehas advance approval from the sponsor.

The budget justification page should contain estimates and justification for all equipment needed to perform the scope of work. Such detail should include the necessity and suitability of the equipment, description, unit cost, and any quoted discount. Estimates should be based on either catalog or telephone quotes, historical cost, engineering estimates, or prior experience. Assistance in matters of price, quality and delivery may be obtained from the Purchasing Office.

The budget justification page should include the necessity and suitability of the equipment, a description, and the unit cost. Stipulation must be made as to ownership of the equipment after the project is complete.

Communications

Communication costs include telephone services, local and long-distance telephone calls, postage (including services such as United Postal Service and Federal Express), and facsimiles. Large mailings of surveys or questionnaires must be identified and justified. These costs should be based on actual experience with an inflation factor built in for future years. Postage for routine correspondence and local telephone costs (equipment, installation, maintenance, line charges, facsimile lines) are treated as F&A costs and are appropriate to budget as direct costs only if the purpose is for the sole direct benefit of the project.

Such costs must be explicitly budgeted, identified to the project, and justified. Shipment of project materials and deliverables are direct costs if incurred for the sole benefit of the project. Project-associated long-distance telephone charges are considered directcosts.

The budget justification page should include a listing of the items and a justification and estimated cost for each.

Travel

Travel costs are classified as those expenses for transportation, lodging, subsistence and related items incurred by employees who are traveling on official College business. Unless otherwise stated by the sponsor, domestic travel is considered to be travel among any of the 50 United States, its possessions and territories, and Canada. Foreign travel is classified as travel outside these areas. During budget preparation, consideration should be given to expenses for attending professional meetings, field work travel and living allowances, consultation with experts, and meetings required by the sponsor. The Business Office has available a Travel and Expense Reference manual. All travelers should familiarize themselves with the guidelines stipulated in the manual. Travel expenses and requests should be clearly justified and reasonable. The budget should be based on a travel agency quotes and sponsor guidelines.

Travel in excess of commercial coach airfare is normally nonrecoverable. Foreign travel is a restricted category by most federal agencies and requires prior approval by the sponsor. When costs are charged to a federally-sponsored agreement, only U.S. airlines may be used.

The budget justification page should include the number of trips, the purpose and relationship to the project, and the estimated costs for each trip. For foreign travel, the countries to be visited and the visit dates must also be included.

Lease and Rental

Lease and rental expenses for computers and peripheral equipment, general equipment, vehicles, land, buildings, offices and storage areas are included in this category. Lease and rental for space are excluded from the base from which F&A costs are calculated and are not subject to the F&A rate. Budgeting for lease and rental should be based on actual experience with an inflation factor built in for future years, or on actual lease agreements. The budget justification page should list the lease or rental item(s) and the estimated cost(s). The Purchasing Office can provide assistance with lease and rental expenses.

Repair and Maintenance

Repair and maintenance are categorized as costs incurred for the necessary maintenance, repair, or upkeep of property that neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in efficient operating condition. Budgeting should be based on actual experience with an inflation factor built in for future years, or from the actual maintenance agreement(s). The budget justification page should include a list of the equipment to be maintained and the estimated costs. To qualify as a direct cost, maintenance costs must be for the sole benefit of the sponsored agreement.

Services

Under this category professional services rendered by Marist interdepartmental services (that are not included in the College's F&A rate), outside firms, companies, or individuals should be listed. For interdepartmental services budgets should reflect actual quotes based on current fee structures or anticipated use. Budgeting for external use of services should be based on actual quotes. Both internal departmental and interdepartmental computer charges must be based on accounting and expense systems developed in accordance with OMB guidelines. The budget justification page should include a list of the type of service(s) and the total estimated costs. Assistance in matters of price, quality, and delivery for external sources can be obtained from the Purchasing Office.

Academic Fees and User Fees

Academic recharge operations and service centers may recover the cost of goods and services provided to internal and external users through rates or user fees. User fees should be designed to recover no more than the cost of the service provided, with adjustments based on prior experience. User fees must be calculated consistently for federal and nonfederal users. User fees may not be based on what others charge for similar services or what the market will bear. User fees should be based on OMB guidelines. New user fees for service facilities must be submitted for review and approved by the Business Office prior to implementation.

User fees for other service facilities must be submitted annually to the Business Office for review and approval. Current rates can be obtained by contacting the Business Office.

The budget justification page should include the rate schedule and calculation of the user fees.

Consultants

Consultants should be listed by name in the budget and the following information provided:

- daily rate of pay
- number of days of employment
- any additional amounts to be paid such as travel and per diem
- the consultant's primary affiliation and expertise
- justification of the need for consultant services

Services of a consultant may be budgeted when the services are sufficiently special, temporary, or technical in nature such that they cannot be performed satisfactorily by existing College personnel during the course of their assigned responsibilities. Since consultants are independent contractors, fringe benefits are not charged. Travel and incidental expenses are included in the total consultant estimate and budgeted under this category. The department should maintain curriculum vitas and other specific information related to the consultant. Designation of independent contractor status is governed by the Internal Revenue's Code of Common Law. Marist may be subjected to significant institutional tax penalties should the individual be incorrectly classified as an independent contractor. Costs should be based on quotes from the consultant and the allowance of the sponsor.

Some sponsors may not permit the use of consultants, or may restrict the daily reimbursement rate. The budget justification page should include the justification, name, expertise, compensation rate, number of days of expected service, related travel expenses, and the estimated costs.

Subcontracts

The cost(s) normally associated with a subcontract could include any or all of the following: labor, employee benefits, materials and supplies, travel, equipment and other direct costs, and F&A costs. The budget justification page should include a line itemization at the same level of detail as requested from the sponsor. F&A costs should be included and calculated using the subcontractor s current rate. A copy of the subcontractor s negotiated rate agreement, a statement of intent to participate, and a statement of work should be submitted along with the proposal budget. The reasons for selecting a particular subcontractor should be explained in the proposal. (Also see Consortium/Partnership Submissions and Issuing Subcontracts.)

Supplies and Materials

Supplies and materials are items used in the performance of the work, and all tangible property other than equipment. Incoming transportation charges (freight, bills of lading) are part of material costs. Reasonable amounts should be budgeted, and projects that anticipate using large amounts or expensive items should specify such items and justify their necessity. Budgeting should be based on actual experience with an inflation factor built in for future years. Assistance in matters of price, quality, and delivery can be obtained from the Purchasing Office.

Routine office supplies should be treated as F&A costs and are only appropriate to budget as direct costs if they are used solely for the project. These direct costs must be explicitly budgeted, specifically identified to the project, justified and approved by the sponsor. Laboratory supplies (chemicals, glassware, disposables), animals (purchase, shipping, housing, maintenance), research supplies and training materials (questionnaires, surveys) are considered direct costs. Care should be taken to explicitly describe all consumables included in a proposal budget.

The budget justification page should include a list of the supplies and the estimated costs for each. The breakdown should be more detailed when the total supplies cost is substantial.

Participant Support Costs

Participant support costs are defined by the Uniform Guidance (2 CFR 200):

Participant support costs means direct costs for items such as stipends
or subsistence allowances, travel allowances, and registration fees paid to
or on behalf of participants or trainees (but not employees) in connection with
conferences, or training projects.

Participant support costs are typically reserved for participants in projects that include an education or outreach component. A participant is the recipient of a training or service opportunity funded by a sponsor. Participants may include students, teachers, scholars, etc. who are the recipients of the training opportunity or service. Participant support costs are used to defray the costs associated with the participant's involvement.

Examples of allowable participant support costs may include: registration fees, stipends, subsistence, travel, conferences, and other costs and fees associated with the participant's involvement in the training or service opportunity. All costs must be allowed by the sponsor and be consistent with Marist College policies for payment and/or reimbursement.

All participant support expenditures must be incurred during the approved project period for the award. Participant support under federal awards require prior approval of the sponsor and any proposed changes in participant support costs require prior approval from the funding agency. Participant support costs are listed as a separate budget category on the proposal budget and remain a separately budgeted account within the grant fund, which is referenced as account 71615 within Marist's chart of accounts structure. The Marist chart of accounts contains a separate account to track all participant support costs, and is monitored and all expenditures reviewed and approved by the Business Office. Any changes in the budgeting of participant support costs requires the prior approval of the funding agency. The PI will work with the Business Office on a prior approval request for submission of budgeting requests to the agency. Participant support costs are excluded in any F&A calculations. Marist College's federally-negotiated indirect cost rate uses Salaries & Wages as a base (Also see Conferences).

Conferences and Seminars

When hosting a conference or seminar, appropriate costs include meals, transportation, facilities rental, and other related items. When budgeting for a conference or seminar, some considerations are:

Employee salaries and benefits: Salaries of professional personnel, editorial, clerical, and other staff are allowable in proportion to the time and effort devoted to the preparation and conduct of the event and summarizing its results. To the extent possible, costs should be based on actual salaries and benefit rates.

Participant Stipends: Participants are the individuals whose primary interest is as beneficiaries of the event. Participants may make formal presentations or give papers. Participants may receive stipends to help defray living expenses while participating in a conference. Allowances should be budgeted at a reasonable rate and are limited to the days of attendance plus actual travel time. (Federal employees cannot receive compensation from other government sources while participating in the event.) (Also see Participant Support.)

Travel, per diem, or subsistence: Reasonable travel allowances related to the conference or training activity (e.g., field trips) may be budgeted.

Registration fees: Registration fees are treated as program income to offset the costs of the event. Fees should be established based on total program costs including both the direct and F&A program costs and divided by the number of expected participants. A registration fee paid to or on behalf of a participant is treated as a direct participant cost.

Non-participants: Reasonable fees (in the form of honoraria), travel allowances, and per diem are allowable for cost of services (e.g., presenters) rendered by persons who are members of a particular profession or who possess a special skill and are not employees or participants.

Facility rental: Rental of facilities and necessary equipment are allowable and budgets should be based on quotes from the service provider.

Conference materials: Necessary expendable materials and supplies are allowable and estimates should be based on actual experience with an inflation factor built in for future years.

Publications: Cost of publishing the proceedings are allowable only if approved by the sponsor. Projections should be based on actual experience with an inflation factor built in for future years.

The budget justification page should include an itemization of the above categories and the estimated costs of each.

Publications

Publication costs consist of the documenting, preparing, publishing, disseminating, and sharing of project findings and supporting material. Budgeting should be based on actual experience with an inflation factor built in for future years. Assistance may be obtained from the Purchasing Office or by contacting a publisher. The budget justification page should include the page charges, number of pages, and the estimated cost.

Facilities and Administrative (F&A) Costs

An F&A cost rate is applied to all restricted accounts for all awards regardless of whether they are categorized as a gift, grant, or contract. In practice, F&A cost is applied as follows: whenever a sponsor is the primary beneficiary, or receives specific deliverables, it is appropriate that the sponsor pay for the full cost, both direct and F&A.

If the award does not provide for any of these conditions, it is still appropriate to charge the full F&A cost. However, the recovery rate may be discounted, but never below fifteen percent of direct costs. The unrecovered F&A costs must be represented as a costshare. In this manner every project supports part of Marist's infrastructure.

On-campus versus Off-campus

Projects are normally budgeted as solely on-campus or solely off-campus. Some projects may, however, involve both. The definition of off-campus activity is that which is performed at a location that has neither the use nor aid of owned or leased College-operated facilities. A College-operated facility is one where Marist is responsible for the costs of maintenance, custodial services, and utilities. In general, off-campus locations are at distances where reasonable access to or use of the College-owned or operated facilities is not feasible. Personnel are considered to be on campus unless they are working off campus for a two month or longer period. Costs generated by personnel working off campus, including their travel to and from the off-campus location, can be budgeted as off-campus. Current Facilities and Administrative Rate information is available from the

Academic Grants Office.

Sponsored Project Administration

Responsibilities

According to the Marist College Faculty Handbook, the Executive Vice President is the "administrator of sponsored research contracts." (See Faculty Handbook, Code 9.21). Responsibilities of other offices and individuals involved in the administration of other sponsored projects are identified below.

Office of Pre-Award (Academic Grants Office)

The Office of Academic Grants serves as the first point of contact for faculty and academic staff wishing to apply for a grant, cooperative agreement or to participate in a grant being prepared by another organization. Services and responsibilities of this office include:

- Assisting PI with funding searches
- Registering PIs on electronic funding alert system
- Advising PIs on the grants process at Marist and agency expectations, interests, and application requirements
- Assisting PI with preparation of budget, budget narrative, and
- Assistance with interpreting agency guidelines and Marist policies

- Advising the PI on strategies for producing a competitive proposal
- Advising PI of changes in federal agency compliance requirements
- Assistance with approval process and submission of grant proposals (See <u>Proposal</u> <u>Development Timetable</u>)
- Assisting with collaborative proposals and working with grants offices at collaborating institutions (See Proposal Development Timetable)
- Reviewing and confirming cost-sharing arrangements as needed
- Advising the VP of Academic Affairs of all grants in progress and any issues that arise
- Fielding questions and advising PIs during proposal development
- Reviewing final proposal and signing off on the final routing for final administrative approvals before submission
- Signing and submitting proposals to external agencies as a backup if necessary
- Assisting PI and Business Office with the negotiation of the terms of grant awards
- Providing guidance to principal investigators and departments prior to award acceptance
- Overseeing institutional management of electronic submission systems
- Overseeing institutional database of all grant awards
- Contacting the PI and Business Office when a grant award is made
- Advising the administration of required policies needed to accept federal awards from various agencies
- Assisting in the development of institutional policies required for federal awards
- Providing administrative reports on annual academic grant awards and serving a repository for records of all academic awards.

Office of Post Award (Business Office)

- Confirming that all grant awards for which an account is to be set up were routed for approval through the Office of Academic Grants
- Assisting PI and Office of Academic Grants in award negotiation as needed
- Establishing an account number for the project
- Assisting principal investigators with interpretation of Banner reports and preparation of paperwork (Also see Post Award Administration below.)
- Providing management and guidance to principal investigators and departments regarding management of grant and contract funds
- Coordinating subcontract arrangements with input from PI
- Coordinating responses to audit reports
- Providing financial accounting, invoicing, and fiscal reporting
- Monitoring each project and its subcontracts
- Notifying PI of reporting requirements
- Overseeing submission of annual/final reports to the sponsor

- Assisting the principal investigator as necessary in managing project funds
- Monitoring as necessary to ensure that funds are expended within the project period and that budget categories are not excessively overspent
- In the event of audit exceptions, disallowances, or overexpenditures, providing funds from departmental sources (or securing them from some other source) to correct negative sponsored project account balances
- Reviewing and approving requests for overdrafts and modifications or amendments (e.g., changes in PI, scope of work, period of performance, budget revisions, carryover of funds, and other contractual terms and conditions)
- Reviewing expenditures for compliance with sponsor and College requirements
 Supervising third party billings and collections
- Monitoring cost sharing records
- Maintaining workload records for effort reporting
- Preparing and submitting expenditure reports to the sponsor
- Maintaining the official institutional records for grants and contracts and providing such information for reporting proposes as requested by college officials, sponsors, and auditors
- Serving as representative to sponsoring agencies on coordination and supervision of sponsored activities
- Ensuring conformance with the terms, conditions, and specifications contained in the award document
- Coordinating close-out activities, including copyright and patent disclosures

Principal Investigator (PI)

The PI develops program plans consistent with the mission of the submitting school/division and has primary responsibility for the following tasks:

- Selecting an appropriate sponsor for the proposed project
- Following the Proposal Development Timetable
- Sending a copy of the application guidelines to the Office of Academic Grants
- Reading the application guidelines to determine proposal competitiveness
- Working with the Office of Academic Grants to initiate the circulation of the preliminary routing form to all PIs, Co-PIs, respective academic deans, and VP of Academic Affairs to secure support for the proposal concept before work on a proposal.
- Developing the proposal narrative
- Working with the Office of Academic Grants on budget development
- Working with the Office of Academic Grants to identify source(s) of any required matching funds.

- Keeping the Office of Academic Grants apprised of progress/changes in proposal development throughout the development of the application
- Participating in negotiation of the grant award with the Office of Academic Grants and Business Office
- Maintaining satisfactory progress in the technical conduct of the project
- Complying with institutional policies and procedures including those related to human resource management; procurement; travel; research safety; conflict of interest; misconduct in research and scholarship; the use of human subjects in research; and other policies
- Managing project funds, including expending funds within the project period and within designated budget categories
- Working with the Business Office on budget modifications and nocost extensions
- Completing and submitting technical reports according to established time schedules
- Providing documentation of grant/contract expenditures and matching contributions, including certification of time and effort

Dean of Principal Investigator (PI)

The Dean of the PI's and Co-PI's school/division has primary responsibility for the following tasks:

- Encouraging faculty and staff to seek external funding projects that fall within the faculty member's professional interests and the school's mission
- Understanding the grants processes and policies at Marist and communicating them to school faculty
- Assisting the principal investigator in identifying source(s) of matching funds (cash and in-kind), if required by the sponsor
- Reviewing proposal for consistency with school/division mission and availability of human and support services, including time, space, and finances
- Assuring that all department/unit and college/school/division obligations, as delineated in the proposal, will be met
- Approving the principal investigator's request to the sponsoring agency via signature on the Pre-Award Proposal Routing Sheet
- Consulting with the principal investigator as necessary to ensure that work on the sponsored project is progressing satisfactorily
- Consulting with the Office of Academic on pre-award grant-related questions/concerns and with the Business Office on post-award issues

- For sponsored projects involving human subjects, the use of animals in research, or the use of biohazards, providing sufficient oversight to ensure compliance with governmental regulations and institutional and professional standards
- Assisting the principal investigator as necessary in solving technical problems with the conduct of the sponsored project

Vice President for Academic Affairs/Dean of Faculty

- Encouraging faculty initiatives related to sponsored project activities that fit the mission of the academic area
- Promoting faculty development activities related to seeking, obtaining, and managing external funding initiatives that fit the College's mission
- Providing support for sponsored projects awarded to the academic area
- Approving faculty time commitments

Signators

The PI's signature on the internal routing form certifies that:

1) to the best of the PI's knowledge the statements in the proposal are truthf ul, complete, and accurate; 2) the text represents the work of the PI or those under the PI's supervision; 3) the PI accepts responsibility for the work to be undertaken and will oversee the project and any collaborative work; and 4) accepts responsibility to complete progress and annual reports on time.

The institutional signature on the cover page of a proposal certifies that 1)to the best of the signator's knowledge, the statements in the proposal are truthful, complete, and accurate; 2) the institution will comply with award terms and conditions and all certifications; 3) any subcontractors under the award will adhere to federal policies and required federal certifications will be included in all award documents to subrecipients; 4) the institution has a written policies and will make them available upon agency request as outlined on the conflict of interest policy; 5) the institution is not delinquent on federal debt; 6) the institution does not have principals who currently are debarred, suspended, ineligible or excluded from transactions with any federal department or agency; 7) the institution complies with drug free work place requirements; 8) the institution will not use federal funds for lobbying purposes; 9) the signator is aware that any false, fictitious, or fraudulent statements or claims may subject him/her to criminal, civil, or administrative penalties.

Procedures for Proposal Processing and Submission

As the proposal is being drafted, the principal investigator is encouraged to consult with his/her dean/department chair and colleagues as necessary, as well as with the Academic Grants Office to ensure that the project is technically and financially sound. It is important to discuss the need for course release time and sponsor matching or cost-sharing requirements with the dean at this stage.

All proposals are reviewed in the Academic Grants Office before submission to an external agency to determine if: 1) the proposal has been approved; 2) incorporates Marist College and sponsor technical and budget requirements; and 3) is complete.

Proposal Routing Process

To obtain the routing forms, contract the Office of Academic Grants early. Signed preliminary and final routing forms represent institutional approvals for all academic grants submitted by faculty and academic administrators. There are two stages of approval. *The preliminary routing* form is circulated at the request stage and is circulated at the proposal concept stage no later than **one month** before the application deadline. For Marist proposals involving other institutions, the preliminary routing should be initiated even earlier and no later than 90 days before the proposal deadline. The PIs, the Academic Dean or supervisor, and the VP for Academic Affairs must sign the preliminary routing form to approve the proposal concept and other requests (such as release time) at the onset of proposal development. This routing form with the PI's proposal concept is appended to a cover letter from the Director of Academic Grants to the VP of Academic Affairs. If there will be a subcontract with another institution, a letter from an authorized representative from the participating institution must accompany the preliminary routing. Proposals requesting Marist matching funds must append a budget to the form at this stage. The final routing form is used to circulate the final proposal and budget with a cover letter from the Director of Academic Grants summarizing the main proposal objectives, participants, and budget request. The final routing form should be signed by the PI a minimum of 10 days prior to application deadline (and 15 days prior for Grants.gov applications). Contact the Director of Academic Grants with any questions about the routing process.

These forms are circulated with the assistance of the Office of Academic Grants. They serve as an institutional record of preapproval for all grant submissions submitted through Academic Affairs. These records are maintained by the Academic Grants Office and are subject to review by auditors. Information on the routing forms is also used to generate annual institutional reports detailing sponsored activity at the College.

The Vice President must sign this form to approve the proposal concept and requests (such as release time). This form must be attached to the cover letter from the Director of Academic Grants and a short summary of the proposed scope of work.

What the Required Signatures on the Routing Sheet Mean

The signature of the **faculty member** or **PI on the routing form** certifies that the information submitted in the application is true, complete, and accurate to the best of the PI's knowledge; that the application is free from any fictious or fraudulent claims; that he/she agrees to accept responsibility for carrying out the proposed project and reporting requirements; that the project will be carried out in accordance with sponsor and College requirements.

The signature of the **Academic Dean on the preliminary routing form** assures the College that the school/division endorses the activities proposed and guarantees any departmental matching in the request. The Dean's endorsement demonstrates the relationship of the proposed activities to the department'soverall mission and future goals and implies that the project has departmental support.

The signature of the **Academic Vice President on the routing form indicates** that the proposal isappropriate to the overall mission of the proposing unit.

The signature of the **Director of Academic Grants on the final routing form** assures that the proposal meets agency guidelines, is in line with Marist College policies where they exist, and conforms to OMB budget cost principles.

The signature of the Associate Vice President or Director of Academic Grants on a grant submission certifies that the proposal is complete; the routing forms are complete; and all sponsor requirements are met.

The signature of the Business Officer on the final routing signature indicates that the budget was reviewed; that the indirect cost recovery is acceptable; that institutional fiscal standards have been met; and that other financial considerations, including matching requests, have been met.

Additional signatures may be required. For example, if the proposed activities cross-institutional reporting lines, all individuals impacted by the proposal may be required to sign off. Also, if the proposal commits to the College resources, the signature of the Chief Financial Officer is also required.

Proposal Development Timetable

This timetable serves as a general guide in anticipating the time needed to create and submit a proposal. Scheduling of proposal tasks will be different for each proposal. Estimate anywhere from 60 to 100 full-time hours for competitive proposal writing.

180-90 Days Before a Proposal is due in the hands of a sponsor

- Review program announcement, guidelines and instructions with Academic Grants (AGO)
- Prepare concept paper describing the project/research
- Prepare plan of work with timeline with AGO
- Prepare outline and/or first draft of research/program plan
- Contact human subjects, animal welfare, and biosafety administrators, as needed
- Coordinate with participating organizations/institutions
- Discuss release time, facility and/or needs, cost sharing, and matching funds with chair, academic dean, or area administrators
- Meet with AGO Director to review timeline
- Begin preliminary budget with time allocations for PI and students with AGO
- Prepare brief summary statement for preliminary routing
- Initiate preliminary routing with AGO

90-60 Days Before a Proposal is due in the hands of a sponsor

- Begin developing full budget with AGO
- Subcontract arrangements finalized (documented in writing)
- Complete draft narrative and if desired, submit it to AGO and others for review and comments

60-30 Days Before a Proposal is due in the hands of a sponsor

- Incorporated reviewers' comments into draft proposal
- Collect resumes, letters of support, agreements, etc.
- Complete final budget and budget narrative
- Review and revise as needed

30-15 Days Before a Proposal is due in the hands of a sponsor

- Submit final budget and justification, narrative to AG Office
- Proofread and prepare final copy of proposal

15-10 Working Days Before a Proposal is due in the hands of a sponsor

• Submit final narrative and budget to AGO for final routing and wrap up.

Multiple Submissions of an Identical Proposal

Identical proposals may be submitted to more than one government sponsor at a time provided each sponsor is advised that this has occurred and none of the sponsors restrict such submissions. Each sponsor should be given the name of the other recipients of the proposal and the amount of funds requested. In instances where all sponsors are given the same total project budget, it should be specified as to how much of the total budget is being requested of each individual sponsor and for what purpose those funds will be used.

Award Negotiation

Proposals are often not accepted and funded exactly as proposed by the principal investigator. Negotiations may take place at various stages of the proposal/award process. Particularly in the case of industry and corporate sponsors, there is often informal contact prior to submission of a proposal between the principal investigator and the sponsor's technical representative. In the case of proposals submitted to federal agencies, contact with a program officer before the proposal is submitted is usually encouraged. Once the proposal deadline arrives, however, any further discussion or negotiation will be initiated by the sponsor.

Faculty and staff members need to be aware that they cannot legally bind the institution, and although tentative agreements may be reached with program officers of a sponsoring agency, these agreements are not legal until appropriate institutional approvals are in place. Depending upon the negotiation involved, approval from the College's legal counsel, financial officers, or the College Board of Trustees may need to be sought. Significant changes made to the proposal during award negotiation will require the proposal to route again.

The sponsor may require modifications to the proposed scope of work or to the project budget prior to issuing a grant award or contract. Negotiations involving the technical content of the proposal are the responsibility of the principal investigator, although it is strongly recommended that the principal investigator involve the Academic Grants Office in all negotiations. Any changes relating to the financial and administrative aspects of the proposal must be referred to the Academic Grants Office.

Generally speaking, the rules and regulations of the sponsoring agency and the policies and procedures of the College that governed the original submission remain in effect through negotiations. Any changes in the proposed scope of work or budget require approval prior to submission to the sponsoring agency. Such approval will be based on careful analysis of the proposed changes and the anticipated impact on both the project and the institution.

The principal investigator's department chair/unit director and/or dean/cognizant vice president may be consulted by the Academic Grants Office prior to approval of modifications to the scope of work or revisions to the project budget. The Academic Grants Office and/or the Business Office may negotiate the terms and conditions of the award with the sponsor. When an agreement with the sponsor is reached, the college will officially accept the award. Principal investigators are not authorized to accept a grant award or sign a sponsored project contract on behalf of the institution.

Award Notification and Acceptance

An award notification is a formal notification of funding that is sent to the College or the Principal Investigator. It may be a grant document, a two-party contract, or a letter of acceptance. The notification should indicate the dollar amount, the period of performance, the rules and regulations that govern the expenditure of funds (these are often incorporated by reference), a schedule for submission of technical and financial reports, and any other information necessary to identify the project. All official notices of grant awards and contracts should be forwarded immediately to the Academic Grants Office so that the document can be reviewed and any needed changes negotiated and the award accepted. Academic Grants Office staff will review the award documents to ensure that the interests of the institution and the principal investigator are protected.

The Academic Grants Office must receive the award notice before an account number will be assigned. Verbal notification from a sponsor is not sufficient for the College to authorize work to proceed. The Academic Grants Office will be responsible to maintain all original contracts and agreements for review by our external auditors annually.

Post-Award Administration

Establishing the Account

Upon acceptance of a grant award, the Office of Academic Grants will notify the Business Office. The Business Office will then schedule an appointment with the PI and the Office of Academic Grants to orient the PI to the grant's management process.

Principal Investigator Orientation

A principal investigator orientation is provided by the Academic Grants and the Business Office upon award and before setting up a grant account. During this orientation, the terms and conditions of the award will be reviewed and any questions the principal investigator has regarding management of the project will be discussed. Since the PI is responsible for the overall management of a sponsored project, he or she should read the entire award document, reread the approved scope of work, and be aware of project performance expectations, reporting requirements, award terms and conditions, funds available, and restrictions on expenditures, etc. An authorized signature form for the grant account will also be completed at that time.

Accessing the Account

A separate account is established for each new project. The issuance of the account number for the project is a form of credit line against which the principal investigator may charge obligations and expenditures without concern for sponsor payments and cash flow consideration. Since most sponsors do not pay the College until expenditures are incurred and invoices are submitted by the PI, it is important that the PI keep copies of all receipts and documentation of expenditures.

Once the account is established, the PI will be given on-line access to his or her new account on Banner system. The balance will be carried forward from one fiscal year to another. However, the PI should attempt to expend all funds related to each project year before the end of each project year. If there are unexpended funds at the end of a project year, the PI may need to submit a no-cost extension request to the sponsor for permission to use funds after the project year has ended. One of the biggest challenges to a PI is trying to reconcile the awarded budget to the project schedule. When only part of the proposed scope of work is complete, the PI risks a shortfall in funds to complete the project. The PI's department or administrative area will then be responsible for covering the outstanding charges on the project's account. Projects completed early may run into the problem of having paid staff without any work to complete. It is important for the PI to try to avoid these circumstances by closely monitoring the budget and the project's progress and timeline.

Budgeting and Rebudgeting

When the sponsored project account is established, sub-account codes are assigned to different expenditure categories. Generally, these codes correspond with approved sponsor budget categories. However, where a specific budget is not outlined in the award or approved proposal, the Business Officewill consult with the PI to allocate the funds among appropriate sub-account codes.

Generally, there is some flexibility between expense categories so long as expenditures are in line with the initial goals of the proposed scope of work. However, if a PI is uncertain of the budgetary restrictions imposed by the sponsor, s/he should consult the Business Office before making expenditures that are not reflected in the award budget.

Rebudgeting requests that do not fall within the authority prescribed by the sponsor in the award document require the sponsor's prior review and approval.

Hiring of Sponsored Project Personnel

All sponsored project personnel must be appointed and paid in accordance with applicable Human Resources hiring procedures and policies. The Office of Human Resources must be contacted prior to hiring new personnel. The Academic Vice President shall make the initial offer of a faculty or academic professional appointment. The Executive Vice President makes staff appointments. The PI determines student appointments with the assistance of the Financial Aid Office.

Hiring Consultants

If outside consultant costs are to be paid by the sponsor, their prior approval is generally required unless specifically provided for in the approved proposal or award. The PI must document the selection of an independent consultant on the basis of qualifications, resources, and experience. Independent consultants are not used to direct or perform a major portion of the program.

The services of an independent consultant should be obtained by preparing a consulting agreement, which must include or be accompanied by a written statement that contains an overall description of the services desired. The consulting agreement establishes a contract with the consultant to deliver services. Reimbursable expenditures are limited to those costs which are allowable to employees under College policy and by the sponsor.

The fee should represent the best estimate of the current market value of the services provided, since compensation must be judged reasonable in relation to the services provided.

Issuing Subcontracts

If some part of a project must be performed by colleagues at another school or by an outside company, the Business Office will issue a subcontract for the work on behalf of Marist College. If a proposal involves a subcontract, advanced notice is required so that a complete proposal (budget and technical information) can be requested from the prospective subcontractor.

The subcontract must be signed by an official authorized to enter contractor agreements for the subcontractor and incorporated into your proposal for the sponsor.

When the subcontractor was identified in an awarded proposal, the sponsor has approved the sole source selection and the costs deemed reasonable to perform the statement of work.

If the subcontractor was not proposed in the original proposal, sponsor approval may be necessary prior to issuance of the subcontract. Prior approval may also be necessary even if the subcontractor was proposed in the original proposal.

Approval in writing from the PI must also be received by the Business Office to release the subcontract. This information is necessary to ensure that the proper steps and determinations have been madeprior to issuing the subcontract. In some very rare instances, it may be necessary for the sponsor to review and approve the proposed subcontract agreement prior to the release of funds to the subcontractor.

In preparing the subcontract, it is important to adhere to the prime agreement terms and conditions and to flow down the appropriate clauses. Sample terms and conditions for current sponsors are maintained in the Business Office. Once the subcontract is prepared, it is normally sent unsigned to the subcontractor for review. The subcontractor may want to negotiate changesor request clarification of the terms and conditions. The College negotiates and coordinates those requested changes with department personnel and thePI, where appropriate. Once negotiations are complete and the signed subcontract is received, the subcontract is executed on behalf of Marist College, returned to the subcontractor, and distributed to the PI and academic dean.

In accordance with the terms of the agreement, the subcontractor may be required to submit a final fiscal report, technical report, or other documents, as necessary, upon completion.

Technical Monitoring

Marist College is responsible to see that the subcontractor's work is conducted and completed in a timely manner for obtaining the other reports required by the subcontract terms and conditions. For example, invention, fiscal, property and audit reports may be required. Progress reports must be reviewed by the Marist PI and discussed with the subcontractor as needed. These reports are usually incorporated in the overall reports submitted to the sponsor by the PI.

Fiscal Monitoring

The Marist PI should prepare a Purchase Requisition for all subcontractors prior to having the work performed. Once the work is complete the PI should approve all subcontractor invoices and submit them to Accounts Payable for payment. The invoice should be checked to determine that the invoice number is correct, costs are properly allocated and the amount invoiced is within the estimated cost of the subcontract.

No invoice will be approved or payment that exceeds the estimated cost of the subcontract, even if approved by the PI. The PI should report any discrepancies with an explanation so that the subcontractor can be contacted regarding the discrepancy.

As the prime award recipient, Marist Colleges assumes responsibility for the progress and completion of the project, which includes monitoring subawards. Marist PIs are responsible for obtaining and reviewing the technical subaward reports and alerting the Business Office about any issues or problems. The Business Office assumes responsibility for monitoring the subawardee's expenditures, compliance with all government statutes and regulations as well as compliance with specific agency requirements and the specific terms and conditions of the subaward. However, the PI and the PI's Academic Dean are involved in the ongoing monitoring process of subawards.

Upon receiving a Grant Award Notice, the Business Office:

- Confirms that the proposed budget has been fully funded or adjusts the subaward budget with the subawardee, as needed.
- Meets with the Marist PI to review the award and ensure that the PI is prepared to work with the subawardee.
- Initiates an internal grant fund.
- Contacts the partner institution's Business Office and/or Sponsored Programs Office.
- Gathers information needed from the sub awardee using the Federal Subrecipient Questionnaire form and requests copies of Single Audit reports.
- Reviews financial information to confirm the subrecipient's DUNS or Unique Identifier number.
- Checks the System for Award Management (SAM) to ensure that the subrecipient is not on the excluded parties list. If subrecipient is on the list, the process is halted and the principal investigator is notified.
- Saves documentation in the grant file.
- Reviews the Single Audit and addresses any relevant issues reported that could affect the management of the award.

As part of its review, the Business Office also:

- Confirms the subrecipient's federally negotiated F&A and Fringe benefit rate agreements and confirms that they correspond to the proposed budget.
- Assesses compliance with other Federal Regulations.
- Confirms an active financial conflict of interest policy is in place that meets the standards of the funding agency.
- Confirms an active research misconduct policy that meets the standards of the funding agency is in place, as needed. (If lacking, sub awardee can follow the Office of Research Integrity's *Sample Policy & Procedures for Responding to Research Misconduct Allegations* for the needs of the subaward.)
- Requests a copy of IRB approval, if necessary.
- Confirms an institutional RCR training plan is in place as needed, or requests that PIs plan for RCR training for those named in the subaward agreement.

After all pertinent documentation is obtained, a subaward agreement is prepared, using the current template. The subagreement is then reviewed by Marist's internal counsel's office. As needed, the agreement is negotiated and a fully executed copy is secured.

The agreement includes all applicable terms required by Section 331 of the Uniform Administrative Guidance (2 CFR 200), including:

- 1. Federal award identification:
 - Federal Award Identification Number
 - Federal Award date
 - Name of Federal awarding agency
 - Indirect cost rate for the federal award, including if the de minimus is charged
 - Project description
 - Name of pass through entity, and unique identification number
 - Contact information for awarding official
 - CFDA number and name
 - Subaward period of performance
 - Total amount of the Federal Award committed to the subrecipient by the passthrough entity.
 - Identification of whether the award is for research and development
- 2. Any requirements imposed by the pass-through entity on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including any required financial and performance reports:
- 3. Any additional requirements that the pass-through entity imposes to meet its own responsibility to the Federal awarding agency
 - 4. An approved F&A rate negotiated with Federal Government, or a determination that the *de minimus* rate of 10% will be applied
- 5. A requirement that the subrecipient permit the pass-through entity and their auditors to have access to the subrecipient's records and financial statements as necessary
- 6. Appropriate terms and conditions concerning close-out of the award

The Business Office is responsible for the timely receipt and processing of invoices, including certification of expenses on invoices, and other financial review as needed. Subcontract monitoring is carried out in conjunction with the Marist PI and the subawardee's sponsored projects office to ensure compliance with program requirements and achievement of performance goals. Additional subaward monitoring practices include the following:

- PI must have ongoing contact with the subrecipient PI and provide oversight of technical responsibilities and report to the Business Office any significant issues.
- The Business Office reviews A-133 audit reports annually for the duration of the subaward.
- If performance problems occur, the frequency of subaward monitoring is reviewed with the subawardee and adjusted in consultation with the PI. Adjustments may include any or all of the following: an increase in the frequency of review; a more detailed scope of work and time line for completion of deliverables; additional supporting documentation for expenditures; more detailed budget; limits on reimbursement amounts for each invoice; restrictions on rebudgeting options, and regular phone or Zoom meetings until the issues are resolved.

• Performance issues with a subawardee will first be implemented using a verbal agreement, which will be modified by a written plan if the verbal agreement is not honored.

Amendment to Subcontracts

During the term of a subcontract, it may be necessary to change or modify one or more of the terms and conditions of the subcontract.

Some changes, such as scope of work or PI, may require sponsor approval before an amendment can be issued. Requests for changes should be submitted by the subcontractor's authorized official and have the approval of the Marist PI prior to requesting sponsor approval.

In most cases, the terms and conditions of a subcontract will remain unchanged for the duration of the subcontract. Amendments to the subcontract, such as time extensions, rebudgeting or fund changes are accomplished by an amendment to the subcontract. When these amendments are done, both the old and new text should be referenced. It also should be noted in any amendment that "all other terms and conditions of the original subcontract remain unchanged." If there is a change in the total estimated cost, a revised budget must be incorporated with the amendment.

The amendment is the vehicle that clearly states the changes and provides for the signature approvals of both parties.

Purchase Requests

The principal investigator of a sponsored project is responsible for approving only those purchases that are reasonable and necessary to achieve the goals of the project and are allowable within the terms and conditions of the award agreement and state and federal law. The Business Office is responsible for answering any questions regarding acceptability of costs or need for prior approval from the sponsor.

Purchase requisitions must be prepared in advance for all materials, supplies and services to be rendered. Planning ahead must be emphasized. All requisitions should be submitted to the Business Office 72 hours before the expected date of processing.

Requests to purchase equipment frequently require prior written approval from the sponsor. The Business Office does not approve project spending. As a rule, standard college purchasing policies apply to purchasescharged to sponsor funds. Any planned deviation from college policies should be discussed with the Academic Grants Office.

For additional information about purchasing transactions, contact the Purchasing Department.

Travel Charges

Travel charged to sponsored projects must be necessary and authorized for the work being performed under the sponsored agreement. The same procedures that are used for other College travel should be followed, subject to any additional specific restrictions imposed by the sponsor. Reference may be made to the travel policy and procedural handbook issued through the Business Office.

It should be noted that federal agencies have restrictive regulations regarding foreign travel. In most cases, even though the awarded proposal may have included a line item for foreign travel, specific prior approval is required for each foreign trip. Also, airline travel reimbursed from federal agreements must be taken on U.S. flag carriers.

Ownership of Equipment

All property acquired through sponsored projects becomes the property of the College unless restricted by the sponsor. Normally with government awards where equipment is financed through a grant, title will be vested in the grantee. If purchased through a contract, title may remain vested with the government. Under no circumstances, however, does equipment purchased through a sponsored project become the property of the individual investigator.

An adequate property inventory system is required by federal sponsors. Therefore, the PI and his or her school must appropriately inventory all equipment and control the use and condition of the equipment. Near the conclusion of the sponsored project award period, the PI should contact the Business Office to inquire regarding the disposition of the equipment. Frequently, title will be transferred to the College, but some sponsors may request the return of property. The Business Office will tag all equipment and should be notified of any changes or disposals.

Effort Reporting, Invoices, Reimbursement Requests

The PI must submit effort reports, invoices for payment, reimbursement requests, grant or required reports, and other financially related documents to the Business Office for processing. Copies of all paperwork should be sent to the Business Office for reporting purposes and future audit purposes.

Unexpended Funds

Unexpended funds at the close of a grant will be disposed of according to the provisions of the grant. If no provisions are made, the grantor will be contacted by letter to determine proper disposition.

Overdrafts and Cost Transfers

Overdrafts

If an account is in overdraft upon expiration of the project's performance period and additional funds are not available from the sponsor, the PI, in consultation with his or her academic dean must clear the overdraft by transferring charges to an appropriate fund account. The school is responsible for affecting the clearance of any such unfunded expenditure from its resources.

Cost Transfers

Cost transfers refer to the shifting of expenses between fund accounts. The federal guidelines for cost transfers state, in part, "any costs allocable to a particular sponsored agreement may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns, to avoid restrictions, or for other reasons of convenience."

To assure that timely corrections are made when costs are mistakenly or charged inadvertently to the wrong fund account, principal investigators are responsible for reviewing their budget statements monthly. Errors should be reported promptly.

Communication with Sponsors

Most funding agencies designate two different contacts: 1) the technical or program officer and 2) the contract or grant officer. The PI interacts most directly with the program officer in proposing, explaining and reporting the results of the project efforts. The PI should be aware that although changes in the project can be discussed with and even suggested by the program officer (and technical aspects may ultimately be approved by the program officer), only the grant or contract officer has the authority to negotiate and change formally the provisions of a grant or contract.

When there is a need to correspond with the sponsor, the PI should prepare a letter, endorsed by the Business Office, which:

- 1. Provides the correct address of the sponsor's grant officer who has the authority to approve the request.
- 2. Cites the agreement (grant, contract, or purchase order) number assigned by the sponsor.
- 3. Clearly states the request.

For No-cost Extensions indicate:

- the number of months needed
- the reason for the need of additional time
- the expected month, day, year the work specified in the agreement is expected to be completed (include sufficient time for completion of the final report)

For Special Purpose Equipment and All General Purpose Capital Equipment, include:

- cost of item
- description including catalog price and relevance to the project
- why it is preferable to purchase rather than rent/lease
- whether equipment will require additional dollars or will be purchased with existing funds, and from what budget category (if rebudgeting is involved)

For Foreign Travel Approval, indicate the:

- cost of travel (air fare, per diem, registration/conference fees
- destination
- reason for travel (e.g., present a paper, collaborate with researchers, attend a conference), and
- date of travel and number of days

Technical, Fiscal, and Close-out of Fiscal Reports

All grants require some type of report to the funding agency at the end of the grant period. Federal agencies usually require a project completion report within 90 days of the end of the grant. It is most important to read theaward notification carefully and to note the reporting requirements. The PI should also check with the Business Office to determine if and when interim reports are required.

Technical reports

Technical reports are the responsibility of the PI. The report usually requires a summary of the accomplishments of the project, an evaluation, and a discussion of any problems that may have hindered the progress of the project. This report must be written within the time frame stated in the award document, and the required number of copies should be sent to the funding agency. One copy should be forwarded to the Business Office.

Fiscal Reports and Close-out of Fiscal Reports

Fiscal reports and close-out of fiscal reports are the responsibility of the Business Office. It is important for the PI to be aware of the requirements of the report that the Business Office will need to submit tothe project sponsor when the project is completed. The PI should plan to complete all major expenditures, except those necessary for ending the grant, at least one month before the end of the grant period. Expenditures which must be made during the last month of the grant should be relayed to teBusiness Office so that funds can be encumbered before the last day of the grant.

Invention Statements

Annual and final invention or patent certifications may be required by the sponsor. If required, the PI must prepare an invention statement that verifies: 1) there were no inventions or 2) the details of any final invention disclosures and lists all inventions previously disclosed under the agreement.

Equipment Inventory Reports

Equipment inventory reports, if required, are submitted to the sponsor.

Records Retention

The College attempts to maintain fiscal records that will satisfy the record keeping requirement of all agencies. Since the College maintains only fiscal records, the PI must be aware that he or she needs to keep records of the technical operations of the project for possible future reference. Retention periods are usually identified in the award notification or in a document incorporated by reference in the award.

Other Policies and Compliance Information

Principal investigator should be familiar with each of the following Marist College policies:

Principal Investigator Eligibility

Responsible Conduct of Research (RCR) Policy

Responding to Allegations of Scientific Research Misconduct

Animal Research

Hazardous Chemical Waste

Biosafety

Conflict of Interest

Intellectual Property

Effort Reporting: All grant recipients must contact the Business Office for Effort Reporting procedures

Sexual Harassment and other forms of Harassment Policy

Conference Code of Conduce

Copyright

The following excerpt from the Marist College Faculty Handbook applies to sponsored agreements:

"Contracts and grants frequently contain complex provisions relating to copyright, rights in data, royalties, publication and various categories of material including proprietary data, computer software, licenses, etc. Under all circumstances, the provisions of the sponsored research contract are binding.

Questions regarding the specific terms and conditions of individual contracts and grants, or regarding rules, regulations and statutes applicable to the various government agency, should be addressed to the Executive Vice President of the College as the administrator of sponsored research contracts."

Marist College's Copyright Policy is found in the Marist College Faculty Handbook (Code 9.21)

Glossary of Terms

The terms defined below may not be included in the Sponsored Projects Manual, but are commonly used in sponsored project administration vocabulary.

Abstract

A brief description of a project consisting of a concise summary of project goals, methodology, may also include staffing, and total cost of the project.

Allowable Costs

OMB defines allowable costs as those that are: 1) Reasonable; 2) Allowable and allocable to the project; 3) Given consistent treatment by use of generally accepted accounting principles; 4) Conform to any limitations or exclusions set forth by the sponsored agreement or OMB.

Amendment

Any change to a contractual agreement needing official signature.

Applicant

The institution submitting the proposal. It generally does not refer to the individual who will serve as PL.

Application

A request for financial support of a project or activity usually submitted in a specified format and in accordance with a sponsor's guidelines and instructions.

Approved Budget

The financial expenditure plan, including revisions, that has been approved by the sponsor and supports the project's activities for a stated period of time.

Assurances - See Certifications

Assurance of Compliance

Refers to certifications that applicant institutions must file before they can qualify for funding from government agencies. SEE ALSO: Certifications

Audit

A formal examination of an organization's accounts. An audit may also include examination of compliance with applicable terms, laws, and regulations.

Authorized College Representative Signature

The signature of a College official who is designated to give assurances, make commitments, and execute such documents on behalf of Marist College as may be required by federal and state agencies and other organizations which provide financial assistance to the College; the signature of an authorized official certifies that commitments made on grant proposals or contract agreements can be honored; and ensures that all sponsored agreements conform to federal regulations, agency guidelines, and College policies.

Award

Funds provided from an external sponsor for support of a project at Marist College. This term is used for both original awards and supplements; it can mean monies or equipment.

Broad Agency Announcement

An announcement that is general in nature and that identifies areas of sponsor interest, including criteria for selecting proposals, and soliciting the participation of all offerers capable of satisfying the government's needs.

Budget

The spending plan for a proposal or award, submitted to and/or approved by the sponsor. Categories include salary, fringe benefits, materials and supplies, travel, student support, equipment, subgrants or subcontracts, publication costs, and other miscellaneous costs.

Budget Category

A portion of the budget designated for a specific kind of expenditure.

Budget Justification

The section of a proposal that explains why the funds listed in the budget pages are being requested.

Budget Period

The interval of time, usually 12 months, into which the project period is divided for budgetary and funding purposes.

Certifications:

Civil Rights: A certification assuring the Federal agency that the institution complies with Title VI of the Civil Rights Act of 1964 (P.L. 88-352, as amended), which prohibits discrimination on the basis of race, color, or national origin.

Conflict of Interest: A certification assuring the Federal agency that the institution has established administrative policies for promoting objectivity in research.

Debarment and Suspension: A certification assuring the Federal agency that the research personnel and the institution are not presently declared ineligible for receiving federal support, have not been convicted of fraud or a criminal offense in the performance of a federal award, are not in violation of federal or state statutes, are not presently indicted for criminal or civil charges and have not within a three-year period preceding the application had one or more federal, state or local transactions terminated for cause or default.

Delinquent Federal Debt: A certification provided to the Federal awarding agency that the applicant organization is not delinquent on the repayment of any federal debt.

Drug-Free Workplace: A certification assuring the Federal agency that the institution does and will continue to provide a drug-free workplace as required by the Drug-Free Workplace Act of 1988.

Handicapped Individuals: A certification assuring the Federal agency that the institution complies with Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112, as amended), which prohibits discrimination on the basis of handicaps.

Lobbying: A certification assuring the federal agency that no federal appropriated funds or any other non-federal funds have been paid or will be paid for influencing any federal official or employee in connection with the awarding of any contract, grant or agreement.

Misconduct in Science: A certification that the institution has established administrative policies dealing with and reporting possible misconduct in science, and that it will comply with the policies and requirements as published in the federal agency's regulations.

Responsible Conduct in Research (RCR): A certification assuring that the institution provides appropriate training and oversight in the responsible and ethical conduct of research to anyone involved in research (including students.)

Sex & Age Discrimination: A certification assuring the Federal agency that the institution complies with Title IX of the Education Amendments of 1972 (P.L. 92-318, as amended), which prohibits discrimination on the basis of sex; and the Age Discrimination Act of 1975 (P.L. 94-135), which prohibits discrimination on the basis of age.

Challenge Grant

A grant that provides money in response to money from other sources, usually according to a formula. A challenge grant may, for example, offer two dollars for every one that is obtained from a fund drive. The grant usually has a fixed upper limit, and may have a challenge minimum below which no grant will be made. This form of grant is fairly common in the arts, humanities, and some other fields, but is less common in the sciences. A challenge grant differs from a matching grant in at least one important respect: the amount of money that the recipient organization realizes from a challenge grant may vary widely, depending upon how successful that organization is in meeting the challenge. Matching grants usually award a clearly defined amount and require that a specified sum be obtained before any award is made.

Civil Rights Certification - see certifications

Competing Continuation

A request for continued financial support from a sponsor to continue the work of a previously funded project. Competing continuations compete with new applications for a sponsor's funds. SEE ALSO: Non-competing Continuation.

Concept Paper - see Informal Proposal

Conflict of Interest Certification - see Certifications

Consortium

A consortium is two or more institutions working in collaboration on the same research project, either funded directly by the supporting agency or one prime institution subcontracting out the funds to the other members of the consortium.

Consultant

An independent contractor who specifically provides professional advice. They usually have a separate skill or expertise not available within the College, and the need for their services commonly does not extend beyond alimited period of time in which to complete a specifically defined project. Contract

For purposes of this manual, a contract is an agreement to acquire services that primarily benefit the sponsor.

Contributed Effort

Effort expended on a sponsored project that the sponsor does not compensate for; a form of cost-sharing.

Cooperative Agreement

A funding mechanism that can be used by government agencies when a program requires more agency involvement and restrictions than a grant but requires less agency supervision than a contract.

CO-Principal Investigator (CO-PI)

One investigator sharing equal responsibility for the direction of a research program. Some sponsors prefer the term 'Collaborating Investigator' or 'Investigator'. Federal sponsors officially recognize only one individual (per institution) as a principal investigator.

Copyright

A narrow form of intellectual property protection. It protects only the fixed expression of an idea, not the idea itself. The Marist College Copyright Policy governs copyright ownership of the works created by its faculty and other employees.

Cost Share

College and non-sponsor resources provided in support of sponsored projects; includes contributed effort and matching funds.

Cost Transfer

Transactions that move funds from one account to another, or move funds within one account from one budget category to another.

Delinquent Federal Debt Certification - See Certifications

Deliverable

A generalized term for a product that is created in fulfilling the terms of a sponsored project.

Direct Costs

Costs that can be specifically identified with a particular project or program. General categories of direct costs include but are not limited to salaries and wages, fringe benefits, supplies, contractual services, travel and communication, equipment, and occasionally computer use.

Discretionary Funds

Money that has not been earmarked for specific items and can be allotted at the discretion of an administrator.

Donated Property

Property provided by an outside party for specific activities related to sponsored project and/or research activities of the College; title to the property passes to the College at essentially no cost.

Donation

Transfer of equipment, money, goods, services, and property with or without specifications as to its use. Sometimes donation is used to designate contributions that are made with more specific intent than is usually the case with a gift, but the two terms are often used interchangeably.

Drug-Free Workplace Certification- See Certifications

Effort

For the purpose of activity reporting on sponsored projects, effort is the amount of time, usually expressed as a percentage of the total, that a faculty member or other employee spends on a project. It does not include work done for supplemental pay. The total effort is always equal to 100 percent even if the employee is part-time or worked only part of the reporting period. If the employee is salaried and works more than 40 hours per week, total effort is still 100 percent.

Encumbrances

A specific amount of funds that has been set aside in an account for the receipt of an order or the payment of an invoice. Encumbrances reduce the available balance of an account.

Equipment

Generally, an article of non-expendable tangible personal property having a useful life of more than two years and an acquisition cost of \$5000 or more per unit.

Expiration Date

The date signifying the end of the performance period, as indicated on the Notice of Award. May also be the date after such an agency's forms should not be used.

Facilities & Administrative (F&A) Cost Rates

The rates used to recover the facilities & administrative costs of a sponsored project.

Facilities & Administrative (F&A) Costs

Those costs incurred for common or joint objectives that therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. Facilities & administrative costs are real, auditable costs incurred by the College each time it accepts an award for a sponsored project. If the university does not collect full reimbursement for these costs, other college resources must be used to subsidize them.

Fiscal Year

Any twelve-month period for which annual records are kept. The fiscal year as defined by Marist College is July 1 through June 30. The Federal fiscal year is October 1 through September 30.

Foreign Travel

Foreign travel includes travel outside of the United States and its territories and possessions (Guam, American Samoa, Puerto Rico, the Virgin Islands, and the Canal Zone) and Canada.

Formal Proposal

Any proposal submitted by a college employee to an outside entity that may directly lead to an award. The majority of formal proposals require an institutional endorsement by an official authorized to commit college resources.

Foundation

A private organization that makes awards to individuals or organizations for a broad range of projects.

Fringe Benefits

Those costs associated with employing staff that are not part of salary. Fringe benefits include such costs as health insurance, retirement benefits, vacation, and federal withholdings.

Full and Open Competition

The solicitation of bids from prospective suppliers which is used to assure that all responsible bidders are permitted to compete for the procurement.

Funding Cycle

Range of time during which proposals are accepted, reviewed, and funds are awarded. If a sponsor has standing proposal review committees (or boards) that meet at specified times during the year, application deadlines are set to correspond with those meetings.

Gift

A unilateral transfer of money, property, or other assets to the recipient for the recipient's ownership and use by a donor who makes no claims on the recipient in connection with the gift.

Grant

A financial assistance agreement whereby money, or equipment, is provided to carry out an approved set of activities. For an award to be considered a grant, it normally will contain the following elements: 1) The statement of work allows the principal investigator significant freedom to change emphasis within the general area of work as the project progresses; 2) Deliverables are minimal, usually consisting of reports only; 3) Separate accounting procedures are required.

Grantee

A grantee is the recipient of a grant. When the College accepts a grant award, on behalf of an individual, it becomes the grantee.

Handicapped Individuals Certification - see Certifications

Human Subject

A Human Subject is a living individual about whom an investigator (whether professional or student) conducting research obtains: 1) Data through intervention or interaction with the individual or 2) Identifiable private information.

Indirect Costs - See Facilities and Administrative Costs.

Informal Proposal

A short (generally 2-5 pages) description of the proposed project that does not involve a commitment of college resources or a signature on behalf of the college. An informal proposal may include a total cost estimate but does not include a budget and is not expected to result directly in an award. The purpose of an informal proposal is usually to inform and interest the potential sponsor enough to request a more detailed formal proposal. Also, sometimes called a letter proposal, preliminary proposal, pre-application, or concept paper.

Informed Consent

The voluntary agreement obtained from a subject (or the subject's legally authorized representative) to participate in research or related activity, before participating in that activity. The consent must permit the individual (or legally authorized representative) to exercise free power of choice without undue inducement or any element or deceit, fraud, force, duress, or other form of coercion or constraint.

in-Kind Contribution

A non-cash commitment (such as contributed effort, facilities use, or supplies) to share the costs of a sponsored project.

Institutional Review Board (IRB)

A board or committee organized at the College to provide review at the institutional level for ethical concerns in research, such as laboratory animal care and the use of human subjects in research.

Invitation to Bid - see Request for Proposal

Letter of Inquiry

A letter of inquiry is initiated by an applicant to determine if a proposed project is within a private agency's fundable program area and to request agency policy and program information, as well as instructions and forms.

Letter of Intent

A letter of intent advises a funding agency that an application will be submitted in response to their solicitation. The letter may contain general program information, unofficial cost estimates, and a request for specific application guidelines, instructions and forms.

Letter Proposal - see Informal Proposal

Lobbying Certification - See Certifications

Matching Funds

A cash commitment to share the costs of a sponsored project. Funds raised under a matching funds agreement are usually matched 'dollar for dollar' by the sponsor.

Material Transfer Agreement

Outlines who will retain final ownership of specific equipment purchased from sponsored project funds. Most frequently it refers to the transfer of ownership from a sponsor to Marist College, or from Marist College to a principal investigator or another institution.

Misconduct in Science

Misconduct in science means fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. It does not include honest error or honest differences in interpretation or judgments of data.

Misconduct in Science Certification - See Certifications

Modified Total Direct Costs (MTDC)

A subset of direct costs on which facility and administration costs may be charged to sponsors by institutions with a MTDC facilities and administration cost rate. These direct costs normally exclude costs such as equipment over \$1,000, rental of off-site facilities, tuition remissions, and scholarships.

No-Cost Extension

Provides for an additional period of performance to accomplish project goals. May be handled internally in certain circumstances or sought externally from the sponsor.

Non-competing Continuation

A request for financial support to a sponsor to continue the ongoing work of a previously approved project. Non-competing continuations are not subject to competing review by the sponsor. Non-competing continuations are, however, reviewed by the sponsor to assure that progress is being made on the project. SEE ALSO: Competing Continuation.

Notice of Grant Award

A legally binding document that serves as a notification to the recipient and others that sponsored funds have been awarded to a grantee to support a specific project or activity.

Office of Management and Budget

Cost principles and administrative requirements are published by the federal Office of Management and Budget (OMB). This circular establishes the principles for determining the costs applicable to grants, contracts, and other government agreements (also known as Sponsored Projects).

Patent

An agreement awarded by the government, granting the inventor the right, for a limited period, to exclude others from making, using, or selling the described invention.

Peer Review

A process used by some federal and private agencies, whereby committees of scholars or professionals with expertise in the same field review and recommend applications to the funding agency.

Principal Investigator (PI)

A faculty member or administrator who submitted a proposal that was accepted and funded by an external sponsor, also referred to as the project director. The PI has primary responsibility for technical compliance, completion of programmatic work, and responsible spending of a sponsor funds.

Priority Score

A score derived from the rating given a proposal by each member on a review committee. It is used to help determine which approved proposals will be granted awards, from funds available.

Program Announcement (PA)

An agency's notification to the research community that financial assistance is available to carry out specific activities. The PA usually includes the program title, special emphasis or interests of the sponsor, type of assistance, and other sponsor-imposed regulations or controls.

Program Officer

A sponsor's designated individual officially responsible for the technical, scientific, or programmatic aspects of a particular grant, cooperative agreement, or contract. Serving as counterpart to the Principal Investigator, the program officer deals with the grantee organization staff to assure programmatic progress.

Rebudgeting

Process by which funds available for spending are reallocated between budget categories to allow best use of funds to accomplish project goals.

Request for Application (RFA)

A formal announcement describing an initiative in a well-defined area that invites anyone in the field to submit a grant application for a one-time competition for a specific amount of committed funds to be used for a specific number of awards.

Request for Information (RFI)

An RFI contains the detailed information that must be supplied in the preliminary proposal.

Request for Proposal (RFP)

Written documents soliciting pricing and/or technical proposals to supply goods or services as specified in the requesting document. The proposal procedure is often complex and must satisfy very specific requirements. Any resulting award(s) would normally be funded by a contract.

Site Visit

An agency-initiated review of a proposed or funded project conducted at the applicant's institution.

Sex Discrimination Certification - see Certifications

Special Purpose Equipment

Equipment which can be used only for research, scientific, or other technical activities.

Sponsor

An external funding source that enters into an agreement with the College to support research, instruction, public service or other sponsored activities. Sponsors include private businesses, corporations, foundations and other not-for-profit organizations, other colleges and universities, and federal, state and local governments.

Sponsored Research

Research, training, or instructional projects involving funds, materials, other forms of compensation, or exchanges of in-kind efforts from sources external to an institution and funded through awards or agreements.

Subcontract

A contract issued under a prime contract, agreement, purchase order, or grant for the procurement of services or program-related tasks. This document formalizes a third-party relationship with another organization to perform substantive work based upon an award made to Marist College is a subcontract. The third party performing the effort under a subcontract is the subcontractor. Issuance of subcontracts under federal prime awards are subject to compliance with federal law and all subcontracts are subject to the terms and conditions of the prime award and the normal purchasing requirements of the College.

Subgrant

An award of financial assistance in the form of money or property made under a grant by the grantee to an eligible recipient.

Supplemental Proposal

The request for additional funding from the project's sponsor to continue activities of an ongoing project.

Terms of Award

All legal requirements imposed on an award by the sponsor, whether by statue, regulation(s), or terms in the award document. The terms of award include both standard and special stated provisions that must be met in carrying out the goals and objects of the grant.

Total Cost

Dollar amount it will take to complete a proposed project. It includes sum of the direct and indirect costs of a project.

Total Direct Costs

The total allowable direct costs incurred by the institution to carry out an approved project or activity.

Unrestricted Funds

Funds having no requirements or restrictions as to use or disposition. Funds awarded under grants, contracts, and cooperative agreements are considered to be restricted funds.

Unsolicited Proposal

Proposals submitted to a sponsor that are not in response to an RFP, RFA, or program announcement.

Marist College Office of Academic Grants 2021