Principal Investigators Handbook

SUNY RF
The Research Foundation for
The State University of New York

GENESEO

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Principal Investigators Handbook

This document is a product of the vast knowledge of The Research Foundation for The State University of New York (RF) Sponsored Programs offices from the following locations in collaboration with RF Learning and Development.

Binghamton University

Buffalo State

College of Nanoscale Science and Engineering, University at Albany

Empire State College

RF Central Office

SUNY Canton

Cobleskill

SUNY Old Westbury

SUNY Oswego

University at Buffalo

Upstate Medical University

SUNY New Paltz

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Introduction

Congratulations on taking the first step toward seeking out and administering funds in support of your innovative and exploratory concepts! Your ideas and work will enhance the academic, commercial, and/or social communities in New York and around the globe.

The Principal Investigator Handbook's primary goal is to help Principal Investigator (PIs) and project staff to navigate the grant process from application to close-out of an award administered by The Research Foundation for The State University of New York (RF).

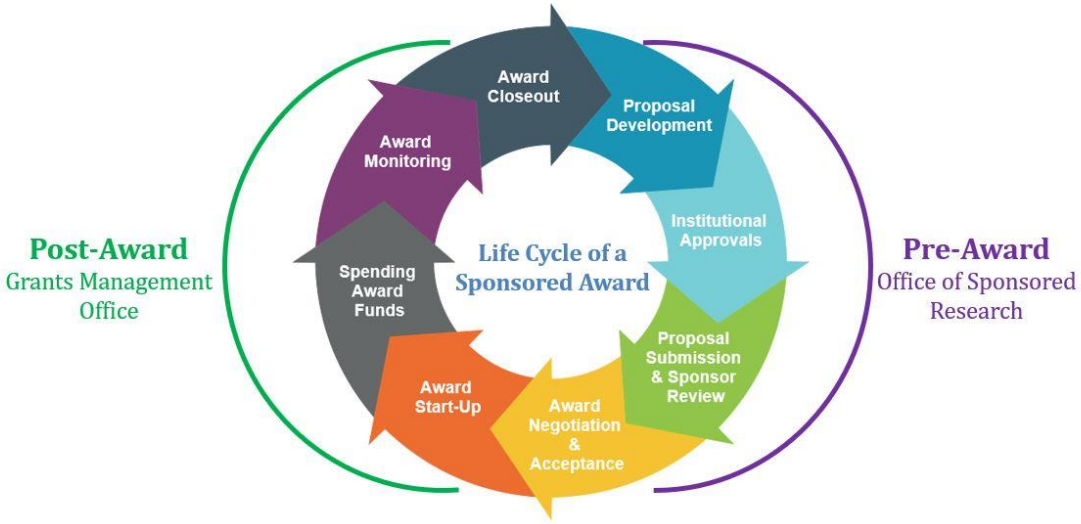

Figure 1.1 Lifecycle of a Grant

While the RF is the legal recipient of the award on behalf of the campus, the PI is accountable for the proper fiscal management and conduct of the project. The RF's central mission is to ensure that PIs and others on the project team have the necessary tools at their disposal to manage a successful project.

Using this Handbook

The Principal Investigators (PI) Handbook serves as a guide to help investigators understand the most fundamental processes that affect the life of a sponsored project and direct them to the appropriate resources. The structure of this handbook replicates the lifecycle from the concept of the project idea to the award, to close out.

The reference materials provide concise explanations of the most common questions and issues as well as links to important and detailed information on federal and organization rules and regulations.

Investigators may contact the Office of Sponsored Research (OSR), or the Grants Management Office (GMO), for assistance in any phase of their project. Together, these two offices form the Offices of Sponsored Programs (OSP).

Office of Sponsored Research (OSR)

For the PI, the first point of contact is OSR. OSR provides:

- Guidance on how to find funding opportunities
- Proposal preparation including budget creation, compliance review, management of the institutional approval process, and submission to sponsors
- Award review and acceptance
- Working closely with GMO to ensure compliance with applicable regulations and sponsor requirements for the complete life cycle of awards.

Grants Management Office (GMO)

When an award is made, information is transmitted to GMO. The GMO staff works with the PI throughout the life cycle of the award in various ways. For example,

- Act as liaison between RF and SUNY Geneseo
- Award establishment
- Compliance review on awards/contracts
- Various administrative support throughout the award's project period
- Track cost sharing and effort reporting
- Provide budget/financial tracking (order processing, vendor payments, process stipend payments, travel reconciliation/payments, account reviews); and
- Overall employee services responsibilities, such as processing new hire assignments

The RF/SUNY Relationship

The Research Foundation for The State University of New York (RF) is the largest comprehensive university-connected research foundation in the country. It exists to serve the State University of New York (SUNY) by providing essential administrative services that enable SUNY faculty to focus their efforts on the education of students, extramural activities, and research across a wide range of disciplines. The RF is a private non-profit education corporation that is tax-exempt under Internal Revenue Code (IRC) Section 501(c) (3).

More information can be found at https://www.rfsuny.org/.

Roles and Responsibilities

Role	Responsibilities
Principal Investigator (PI) or Project Director (PD)	When researchers are funded by a sponsor, PI/PDs assume fiscal and legal responsibilities. Each PI/PD is responsible for assuring that the terms of the award are met, and the policies of the campus are followed. Sponsoring agencies, the campus, and academic departments are all stakeholders in the success of the sponsored project, and each may have specific requirements. If PI/PDs fail to abide by the policies of the RF, the campus, or the sponsor, they may be liable. Generally, a PI/PD must: • Conduct and manage the technical research • Comply with all applicable state and university policies, procedures, and laws • Comply with all terms and conditions of the sponsored award • Manage project funds efficiently and effectively within approved budgets • Ensure that the project is completed in a professional manner • Accept fiscal responsibility on behalf of the department represented, administrative unit, and/or campus if the project becomes overextended or an unauthorized expenditure is disallowed by the auditors
Offices of Sponsored Programs (OSP)	OSP has dedicated staff members who assist in the development and submission of new grant proposals. Their primary mission is to promote extramural funding of research and scholarly activity and to help PIs by • Providing administrative services to help meet the requirements of the sponsor, RF, and the campus • Working with the RF's Central Office team to ensure that the PI is protected from any undue harm before the acceptance of a sponsored program • Verifying that the project does not - challenge institutional integrity - threaten PI's academic freedom, or - overburden the PI with management procedures • Protecting the campus from additional conflicts by making certain no unnecessary risks and liabilities are undertaken • Ensuring proper stewardship of sponsored funds • Creating mechanisms for accountability • Developing procedures for the proper use of sponsored funds • Interpreting sponsor's rules • Establishing compliance with public policies • Filing assurances and certifications regarding regulatory compliance, and • Serving as the official liaison between the campus, RF, and the funding agency
Research Foundation (RF)	The RF is the legal recipient of the awards administered by them. It assists campuses and faculty by • Reviewing, negotiating, and accepting sponsored agreements on behalf of campuses • Managing central accounting functions including billing and fiscal reporting to sponsors • Assisting with compliance

Additional Involved Parties

In addition to the PI's responsibilities, the parties described below are, or may be involved in a sponsored project.

Operations Manager (OM)	Reporting to RF, the RF Operations Manager (OM) serves as the top-level RF executive on campus and is responsible for supporting SUNY's research mission and the successful implementation of the RF's strategic plan. The OM is responsible for all RF operations on campus, including: ● Administering sponsored program services to faculty, students, and staff ● Providing stewardship to our sponsors ● Creating an environment to support and increase sponsored program funding ● Assisting in technology transfer and commercialization in support of SUNY's efforts to revitalize New York's economy
Co-Principal Investigator/Project Director	Other person(s) primarily responsible for the scientific, technical, and administrative conduct of a project. The appointment of Co-Principal Investigators does not supplant the need for one individual to be designated as a "corresponding" investigator. In this secondary role to the PI, a Co-PI: ● Provides leadership over a specific task of the project ● Coordinates with the RF, if at another institution ● Coordinates necessary approvals, if at other institution ● Contributes to managing the project and any reporting requirements
Collaborator	A person or entity typically volunteering some effort to conduct one minor task, measurement, or analysis. This individual is neither compensated nor involved in management or reporting a project. A Collaborator may be asked by a sponsor for a letter explaining their contribution to the project.
Sponsor	A sponsor is a person or entity who funds the sponsored program. There are three main types of sponsors: ● Federal agencies ● Other government agencies (state or local government) ● Private entities such as foundations, corporations, or individuals

Starting Out: Proposals and Funding

Overview

The PI has primary responsibility for obtaining and managing awarded funds, from finding funding sources to closing out the award when research is complete or the funding ends.

OSP can assist PIs in all aspects of any phase during the grant process.

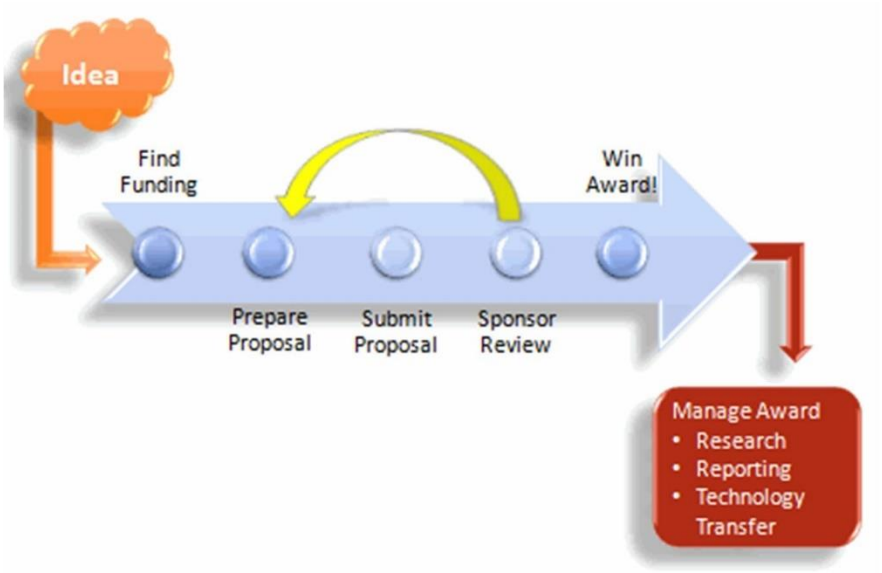

Figure 3.1: The Grant Process

Developing a Concept

A good proposal stems from a good concept. A proposed project should link to an important problem, challenge, or new idea.

What is a "good" idea?

For research, a good idea is one that adds to the general knowledge base, brings a new perspective, or fills a gap in previously conducted research. For other types of projects, the good idea may fill a need for the institution or the community at large. In addition to presenting a good idea in a proposal, a thorough literature review will be essential to provide the background and rationale for the work.

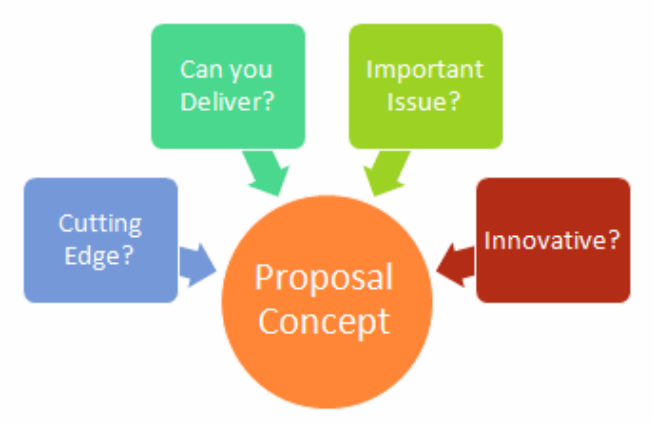

Figure 3.2: Proposal Concepts Must Be…

Preparing a strong proposal requires a significant investment of time, ingenuity, and energy. The sections below will help PIs focus their efforts on specific principles to help accomplish a project. It is best to use each suggestion as a guideline and not as a hard and fast rule.

PIs are advised to contact the program officer at the sponsoring agency with questions as the concept for the proposal is being developed. They might also want to solicit input from peers before discussing their new lines of research. If a proposal is petitioning for unsolicited funding, it needs to address the concept's impact on industry or the community, expertise available and needed, the cost-effectiveness of the proposed plan, and how the project will be evaluated and disseminated.*

> ***"A good proposal is a good idea, well expressed, with a clear indication of the methods for pursuing the idea, evaluating the findings, and making them known to all who need to know."***
>
> ***– National Science Foundation***

** This is not an all-inclusive list. Refer to standard proposal guidelines from potential sponsors or grant writing resources for specific instructions.*

Clearly Identify the Project Idea

Having a clear and concise plan of how to carry out the project will help *scale* the project. Each potential funder will want to know how far along a project is in development, what the intended goals and objectives are (both short- and long-term), why is the idea important or revolutionary, how much the project will cost (both short- and long-term), and how long it might take until progress is made. Attempting to answer anticipated questions will help create enthusiasm for the project idea and get funders behind the proposed work. Also, being aware of the current stage of an idea will determine which solicitations are best to pursue. This exercise is important to undertake before responding to a solicitation.

Searching for Funding

SUNY Geneseo currently subscribes to InfoEd's Sponsored Program Information Network (SPIN) service, which is readily accessible from any campus computer. Faculty and staff searching for a funding source may establish a SPIN profile, which enables them to save search information and receive alerts when new opportunities matching their search criteria are posted. To sign up for a SPIN account, please contact OSR.

OSR also subscribes to Foundation Directory Online. Those looking for funding opportunities can request the OSR staff to run a search through the directory. Just send 6-8 keywords to OSR and they will search for you.

Locate Fresh Leads

- **Mentors/Peers**
  This is probably the most underutilized resource available. Advisors and former co-workers (postdocs and fellow graduate students, etc.) can also serve as a good place to start to identify previously untapped resources.

- **Professional Journals**
  All publications stemming from funded research must provide a notation of which agency supported the work. If a PI sees a project that is similar in nature to their own, it might be beneficial to review the programs the funder offers for support on a regular basis.

- **Professional Conferences**
  Much like professional journals, conferences offer detailed information about sponsors in a PI's area of study. Sometimes sponsor officials attend conferences and it is a good place to network.

Identify a Good Solicitation

Once a potential solicitation is identified the PI can assess the suitability of the sponsor with the prospective project. The PI can:

- Learn about the sponsor's priorities by finding out about which specific areas they are funding and matching them with their project research priorities.

- Look at what types of proposals have been previously funded. This can be done by studying the sponsor's annual report to see what projects have been funded, and whether the awarded grants were for projects similar to the prospective project.

- Contact the sponsor. Studies have shown that the best thing a PI can do to increase their chances of getting funded is to contact the program officer. Program officers can provide up-to-date information about available funds, discuss the project with the PI, and how it would or wouldn't fit into their program. A program officer might even read a summary or draft of the proposal and provide feedback.

- Read the sponsor's guidelines and procedures and call upon the resources of OSR. Typically, they can give insight about a specific solicitation and whether other investigators at SUNY Geneseo have been successful.

Award Types

Consider the type of award agreement (e.g., grant, contract, gift, subcontract) offered by the sponsor/ collaborator:

A **GRANT** is defined as an award mechanism to transfer money, goods, property, services, or other items of value to universities to accomplish a public purpose. In general, the following characteristics describe a grant:

- No substantial involvement is anticipated between the sponsor and recipient during performance of activity.
- The award comes with terms, conditions, and/or other contractual requirements that need to be met.
- There are budgetary restrictions that must be followed.
- Reports may be required, including financial reports and technical or progress reports.
- Documentation of expenditures is required.
- Promised deliverables of any kind, including the sharing of research results, must be honored.
- There is a start and stop date.

A **CONTRACT** is defined as a binding agreement between parties for the purpose of securing goods or services. In general, the following characteristics describe a contract:

- There is extensive input from the sponsor into the tasks to be performed.
- The award mechanism used by the sponsor is a contract.
- The principal purpose of the sponsored project is to directly benefit or be used by the sponsor.
- The sponsor requires formal reports including financial or technical.
- Invoicing or billing is required.

The contracting mechanism also has terms and conditions such as:

- Ownership of intellectual property.
- Right of first refusal, or right of first negotiation of intellectual property.
- Ownership or access to research results.
- Publication review of faculty, graduate student, or postdoctoral research.
- Deliverables of any kind.
- There is a start and stop date.

A **GIFT** is defined as any item of value given by a donor who expects nothing of significant value in return, other than recognition and disposition of the gift in accordance with the donor's wishes. In general, the following characteristics describe a gift:

- No contractual requirements are imposed and there are no "deliverables" to the donor. However, the gift may be accompanied by an agreement that restricts the use of the funds to a particular purpose.
- A gift is irrevocable. While the gift may be intended for use within a certain timeframe, there is no specified period of performance or start and stop dates.
- There is no formal fiscal accountability to the donor.

A **SUBCONTRACT** is a contract for an institution or person to do work for another institution as part of a larger project. In sponsored research, the primary award recipient, or lead institution, is responsible to the sponsor for the terms of the grant or contract while the researcher from the non-lead institution will perform a piece of a larger project. A subcontract specifies the terms between the two institutions, outlines the work expected, and specifies the budget for the work.

Other types of agreements are Cooperative Agreements, Clinical Trials, Vendors, Data Use, Material Transfer, or Consulting. All these agreement types are typically funded as contracts. Award types are managed, reported, and monitored in different ways. Once a funding opportunity has been identified, contact OSR. OSR staff will guide PIs through the rest of the proposal development process.

Developing Proposals

Overview

There are important standard components in a good proposal; omission of any of these components jeopardizes the proposed project's chances of getting funded. No one wants to have their application rejected without review for a technicality. Reviewing and preparing an application according to the guidelines ensures that the application will be reviewed.

Application Guidelines

All solicitations post specific guidelines on how applications must be prepared for sponsor review. "Guidelines" is the generic term; however, agencies have a variety of names for them, such as:

FOA – Funding Opportunity Announcement
NOFO – Notice of Funding Opportunity
RFP – Request for Proposals
RFA – Request for Applications
CFP – Call for Proposals
CFA – Call for Applications
NIA – Notice Inviting Applications

Some proposal guidelines prescribe *sections*; if so, keep them consistent; thus not deviating from them. It is imperative that applicants follow the guidelines each sponsor posts. These guidelines outline the very specific ways in which an application should be developed.

Figure 4.2 identifies the general components of both a research and a humanities, or training grant proposal.

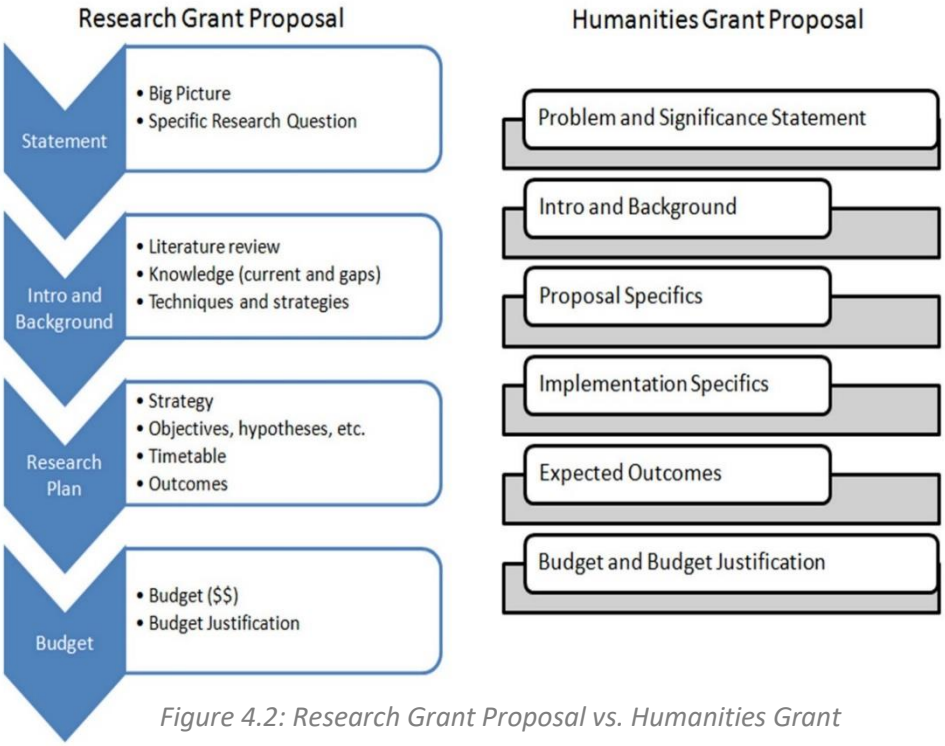

Figure 4.2: Research Grant Proposal vs. Humanities Grant

Key Components in Developing Proposals

Take special note of the sections given below. These are components that should be thoroughly reviewed with OSR staff, who give guidance in pre-award activities.

Budgeting

Developing a budget can seem like an intimidating and daunting task, but it needn't be. OSR is well-versed in how to draft budgets. The OSR staff knows how to calculate the costs, is familiar with what can and cannot be included, and helps ensure that the applicant hasn't forgotten any potential budget items.

A proposal budget typically consists of two parts: the *budget form* and the *budget justification*, a narrative that explains how the costs given on the budget form were arrived at.

Some basic tenets are:

- All costs need to be **reasonable**. Requested budget items should reasonably reflect what is needed to complete the project.
- All costs must be **allowable**. There are some rules regarding what are allowable costs. The guidelines usually discuss allowable and unallowable costs, and OSR can provide guidance.
- All costs must be **allocable**. This means that the costs must be used solely to advance the work of this sponsored project.

Good budget development ensures that the project team members have the financial resources to complete the project as proposed and limits the potential for difficulties in post-award fiscal management. Below is a list of the more common budget items and some guidance for each item.

Personnel Costs

The cost of personnel to conduct a project is typically the largest and most important component of any budget. The RF is legally obligated to properly classify workers based on the criteria listed below. The PI is obligated to ensure that personnel budgeted in an application are properly classified.

A project may incur significant delays if an error is made in the application budget and then must be changed during the post-award phase of the project. To avoid these unnecessary delays employees and consultants are budgeted using the following guidelines:

- **Employee versus Consultant**
  In general, an *employee* is someone whose primary employment is as a New York State (NYS) or RF for SUNY employee.

  A *consultant* does not have a state or RF appointment and will provide specific and measurable outcomes to a specific task in a separate scope of work. Examples include delivery of a training curriculum, review and opinion of experiment results, and development and performance of project evaluation. Typically, a consultant is not a NYS or RF for SUNY employee.

- **Institutional Base Salary**
  This is the actual base salary of an individual who will work on the project. OSR will be able to access this information and provide the most up-to-date and accurate figure. The budget justification is the place to explain, in some detail, why the individual was chosen for the work.

- **Fringe Benefits**
  Fringes are the benefits package for being employed by the institution. Most employees of a project will receive fringe benefits. The time frame for work on the project determines which fringe benefit rate to use. In general, summer work has lower fringe benefit rates, which allows the most efficient use of funds.

  When an award is made, the fringe benefit rates in place at the time the expenditure occurs will be assessed. Regardless of how the budget was initially proposed, the current rate will apply, so it is best to use the projected fringe rates.

Equipment
The federal definition of equipment is something with a useful life of one year or more and with a unit cost of $5,000 or more. Some sponsors, however, have different criteria for what counts as equipment. Items with a lower cost, including computers, should be included in the materials and supplies budget line.

Subrecipient (Subaward) versus Contractor
Budgeting for a subaward versus an independent contractor is similar to the dilemma posed by budgeting for an employee versus a consultant. The RF's "Subrecipient vs. Contractor Decision Tree" can help make this determination. In summary,

- A **subaward** is made to an academic institution or other outside entity providing significant intellectual contributions to the proposed project. It is anticipated that a subrecipient will provide results of an entirely separate project team who will be working on a separate research question or other component that will add significant intellectual value to the lead institution's overall proposed project.

- A **contractor** will provide goods or services that will not require any "new" intellectual contributions to complete the work. Keep in mind that any work contracted will be fully owned by the RF, and the contractor will have no rights to the work performed.

  Do not use this arrangement to avoid indirect costs of subcontractors. The terms of a contractor arrangement will not be attractive to potential collaborators.

Materials and Supplies
Materials and Supplies are the costs needed to perform the experiments or fieldwork of the project. When developing a budget, it is best to also develop a detailed justification to complement the amounts being requested. Be sure to include succinct descriptions of the cost of the materials and supplies and why they are necessary for the success of the project.

All sponsors want to know that the funds will ultimately be spent and whether the costs are an efficient and effective use of funding.

Travel Expenses
Conference and research travel are common aspects of many sponsored awards. Therefore, becoming familiar with RF travel is important.

Subject Costs (Human or Animal)
Sometimes awards provide payments to human subjects as an incentive for them to participate in the study. Before supplying gift cards, cash, or other non-cash incentives be sure to discuss with GMO how to handle these payments.

Direct vs. Indirect Costs

Direct Costs	Can be identified specifically with a sponsored project, instructional activity, or other sponsored activity, and thus directly assigned relatively easily with a high degree of accuracy. Examples: salaries and wages, fringe benefits, equipment, supplies, utilities, travel, or publication expenses.
Indirect Costs	Referred to as facilities and administrative (F&A) costs by the federal government; sometimes referred to as "overhead." Defined as expenses that cannot be directly and uniquely assigned to any particular project and aligned with two categories; *Facilities* and *Administrative*. Indirect Costs include lighting, administrative personnel expenses, computer networks, telephone services, etc. SUNY Geneseo has a negotiated indirect cost rate that is standard across federal sponsors and is thus reimbursed accordingly. Because the sponsor is providing F&A costs directly to the institution it is not acceptable to charge costs that cannot be allocated to a specific cost in a project.

To help better determine whether a cost is a direct expense vs. an indirect cost, consider first the impact the cost has on a project. For example, if a computer is being purchased by a grant, the federal sponsors require the institution to have documentation that the computer will be used to further the goals of the project.

PIs should consult with OSP about any cost included as a direct charge. The staff will help to determine how to best proceed in what should be and should not be a direct cost for the project.

Indirect costs are calculated in the proposal budget as a percentage of the project's direct costs. PIs should contact OSR to find out the percentage to use and the direct cost base SUNY Geneseo has negotiated.

Other budget considerations include project evaluation, participant support costs, insurance, and project-specific audit costs.

Budget Justification

A project's success is enhanced when its budget adequately covers the costs. These necessary costs need to be explained in as much detail as possible in the budget justification. Providing a good rationale on budget items provides transparency to the application reviewers.

Compliance

Most research involves compliance with some federal laws and regulations governing the conduct of the work. The following page lists the more common regulatory areas affecting federally funded research projects. This is not an all-inclusive list. For more information, visit SUNY Geneseo's Research Compliance and Policies and RF Compliance.

Compliance Training Resources

The RF provides resources to learn about regulations and compliance standards. Course completion is tracked, giving verifiable proof to sponsors of the project team's knowledge of the subject areas.

CITI Training: A system-wide license for all campuses to utilize specialized training on several research-related topics including Responsible Conduct of Research, Financial Conflict of Interest, and Humans Subjects and Animal Care.

If there are any questions or concerns about any regulatory issues or accessing CITI Training, contact OSR for assistance.

Human Subjects Protections	All research involving human subjects, federally funded or not, must be reviewed and approved by SUNY Geneseo's Institutional Review Board (IRB). Many proposal applications request the IRB approval date if the research proposed involves human subjects. Be aware of the IRB protocol review schedule to schedule a complete review before the proposal deadline. Some sponsors allow just-in-time IRB approval.
Animal Protections	All research involving animals, federally funded or not, must be reviewed by SUNY Geneseo's Institutional Animal Care and Use Committee (IACUC). Many proposal applications will ask if the research proposed involves animals and, if so, request the IACUC approval date. Be aware of the IACUC protocol review schedule to schedule a complete review prior to the proposal deadline.
Conflict of Interest	To ensure the validity of research there must be no personal financial conflict of interest, real or apparent. Become familiar with SUNY Geneseo's conflict of interest policy and the prospective sponsor's conflict of interest requirements. Some sponsors, particularly those in the Public Health Service, have stringent requirements.
HIPAA	The Health Insurance Portability and Accountability Act (HIPAA) limits the use of protected health information that is held or transmitted in any form or media, whether electronic, written, or oral, to protect the privacy of patient health information. If the research involves the use of individual medical records the researchers need to follow HIPAA guidelines.
Export Controls	These federal regulations involve the disclosure, shipment, transfer, or transmission of any commodity, technology, or software that is on the *Commerce Controlled List*, *Munitions List*, or the *Office of Foreign Assets Control Embargoed List* for use outside of the United States. Before taking any piece of research equipment out of the U.S., or sharing it domestically with a foreign national, researchers need to determine if it falls under any of these lists. If so, they will need to get a license before leaving the country with the item. Since obtaining a license can be very time-consuming, check with OSR early on to see if a license is needed.
Confidential/Research Data	Proprietary Data should be disclosed and marked as confidential as part of the application. Disclosure of information before taking the appropriate protections could limit researchers' ability to commercialize research results.
Research Misconduct	Fabrication, falsification, or plagiarism in proposing, performing, and reviewing research or in reporting research results constitutes research misconduct. SUNY Geneseo has a policy and procedure for handling research misconduct.
Infectious Agents, Recombinant or Synthetic Nucleic Acid Molecules	SUNY Geneseo's Institutional Biosafety Committee (IBC) provides a required Biosafety Registration Form for research involving recombinant or synthetic nucleic acid molecules or infectious agents. The form allows all research with potential hazards to be registered with, reviewed, and approved by the IBC. This ensures all research adheres to all state and federal guidelines, including NIH guidelines.

Submitting Proposals

Overview

Representatives in OSP are designated by the RF as the primary signatory on all applications submitted on behalf of SUNY Geneseo. They will review proposals before the submission of an application.

It is helpful to give OSR notice of intent to apply for a grant as soon as possible. To obtain the necessary administrative approval signatures before submission of a sponsored research application, researchers need to provide a final budget and budget justification, and a near-final project description draft at least two weeks before the submission deadline.

- **Administrative Approval.** Once OSR has the documents necessary to begin the circulation of documents for institutional approval, staff members complete SUNY Geneseo's Institutional Approval Form and bundle it with the application materials for e-signatures. This form identifies the basic elements of an application, such as: What is the title? Will there be animal or human subjects? Who will be the sponsor for the proposed work? Are there additional PIs or co-PIs? Are institutional matching funds required?

  These internal documents are vitally important in ensuring compliance with federal and campus policies.

- **Additional Institutional Requirements**. Depending on the complexity of the project or sponsor requirements, additional components may also be necessary to be included with an application before review, e.g., institutional letters of support.

Award Acceptance and Negotiation

The RF negotiates and accepts all awards on behalf of the PI and the campus. RF has the knowledge and expertise to ensure that faculty, staff, and students are not adversely affected by the agreement terms.

The agreement will specify the amount of the award, the project period, budget limitations, reports and other deliverables expected, and any other terms and conditions the sponsor may require. If any of the agreement terms are unclear, it may be necessary for either party to negotiate more concise and/or mutually favorable language.

Post-Award Management

Overview

This section intends to provide guidance on the financial and other post-award administration provided by GMO upon the award of a sponsored project.

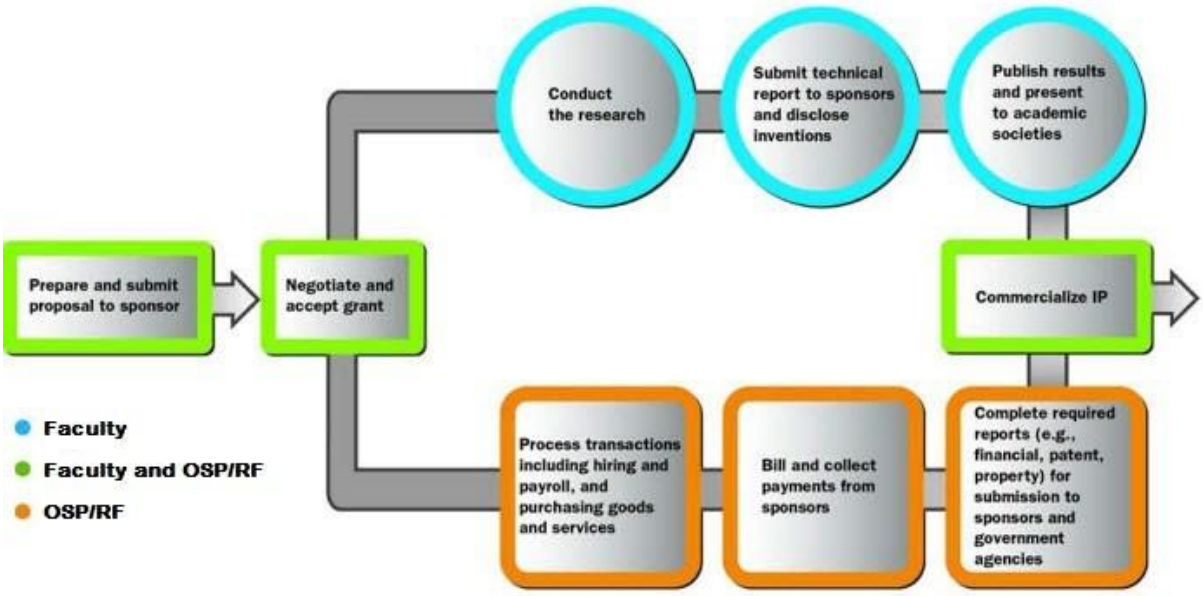

Figure 6.1 Lifecycle of Grant

Revisiting the grant lifecycle above, there are processes assigned to the PI and the RF, either through the RF central office or by GMO. OSP is available to assist in keeping track of research and sponsor requirements. Ultimately, the PI is accountable for all requirements.

Award Establishment

The RF creates a project-specific account after an official award notice has been accepted, referred to as PTAEO (pat-ay-oh). The account number consists of an award number, a project number, and a task number.

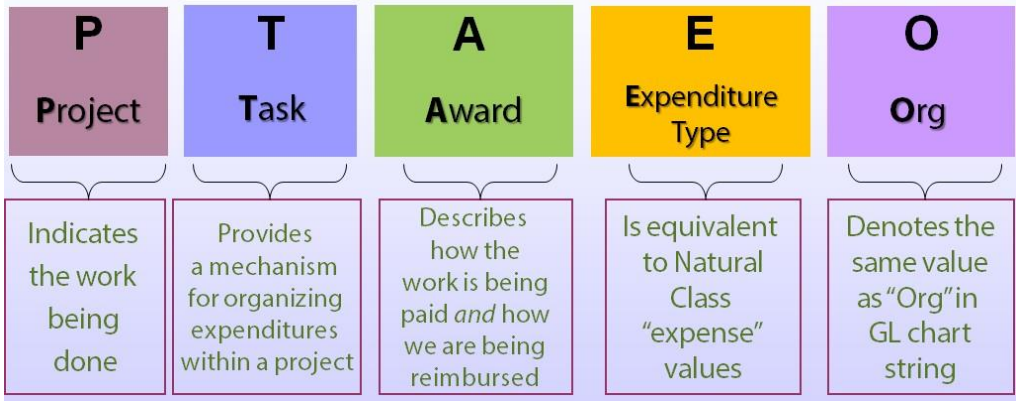

Figure 6.2 PTAEO Breakdown

This specific account is created to track all project expenditures. The PI will be notified when the account is established. Prior to any account establishment, OSP will verify that all appropriate compliance approvals are complete.

Monitoring Sponsored Award Financial Activity

The RF offers multiple web-based tools within the RF's Report Center to allow PIs to monitor the financial activity of their sponsored award(s). The *PI Dashboard* provides PIs (or others that they designate) with the ability to see the award's budget, what has been spent, what is encumbered, and what balance remains in each budget category.

The PI is responsible for verifying the payment of all expenses submitted and ensuring there are no unauthorized charges against the award. For this reason, it is recommended that the PI (or PI designee) reconcile the activity of the account monthly.

To access the system, contact GMO for assistance.

Awarded Budget Revisions

Each award has a budget that has been approved by the sponsor. Part of effectively managing any award is to stay within the originally agreed-upon budget parameters. As referenced in the previous section, the RF's *PI Dashboard* (RF's Report Center) is an effective tool to help with this.

It is not uncommon to need budget category revisions. In this case, the PI cannot simply change the budget. This is because each sponsor has specific policies when it comes to making budget modifications, typically outlined in the award, which must be adhered to in the management of a project. If a PI needs to modify the budget, they must work with OSP to make these modification.

Key Award Considerations

Though not an all-inclusive list, the items below are all major concerns while managing an award.

Project-Specific Personnel	Hiring project staff may be a necessity to conduct the project work. The RF complies with applicable laws and regulations that have been established to maintain salary and wage equity and consistent treatment of its employees. As such, some measures will be taken, during both the search and hiring process, to ensure that the final candidate was chosen fairly and has the appropriate credentials. Before any commitments are made, verbally or in writing, the PI must contact GMO to ensure compliance with campus policies on employee hiring. Once an employee is on the payroll, the PI must review and sign the time reporting and the leave exception reports to verify that the reported time worked and time off are accurate. Questions regarding employee appointments and time reporting should be addressed to GMO staff. If there are any changes to the employee status, the PI must contact GMO immediately. Employee appointment and change of status forms must be completed on a timely basis to ensure that salary expenditures are charged appropriately to the award.
Effort Reporting	Each project budget or award will designate an amount of effort a PI and other project staff will devote to a project. If any changes are expected to the amount of effort, the PI must contact GMO immediately. Changes to effort generally have a ripple effect through the budget and can significantly affect the terms of the research agreement. PIs will be required to certify their effort and the effort of their research staff for all federal and federal flow-through sponsored programs. This is done electronically via the RF's Effort Certification and Reporting Technology, eCRT, twice per year. Certifying effort requires that the PI, or a person having firsthand knowledge, acknowledge that all personnel provided effort as agreed to in the project proposal. Failure to certify employee effort on a timely basis could result in disallowances. Any nonexempt employees participating in a project will certify their effort via their biweekly timesheets.
Purchasing	The RF must ensure that all expenditures comply with sponsor, RF, and campus guidelines. In addition, following *federal requirements,* all expenditures must be **reasonable**, **allowable,** and **allocable** to the sponsored project. Procurement and Property Control Services Department staff will assist PIs with the purchase of necessary project items and equipment at the best price possible, establish quality relationships with suppliers that will meet project needs, and get goods, products, and services as quickly as possible.

Travel	Travel plays an important role in many sponsored projects. Some sponsors may have specific travel conditions or restrictions. PIs are responsible for certifying that all travel undertaken in connection with sponsored projects is made for the express purpose of carrying out the project objectives. Individual travelers are responsible for the appropriate use and accurate accounting of travel funds provided to them, as well as for compliance with sponsor and RF policies. Therefore, before leaving on any trip, it is best to consult with GMO to ensure project team members have accurate information and necessary approvals. GMO Travel Page
Cost Transfers	A cost transfer reassigns expenditures previously recorded in one award to another award. The award to which a cost is transferred must benefit from the goods or services related to that charge, and the charge should be allowable under sponsor guidelines. Expenditures should be charged to the appropriate award when they are incurred. If it is necessary to transfer expenditures to a different award for *approved* circumstances, the cost transfer should occur within 90 days of when that need is identified.
Reporting	Financial, technical, and progress reports are often required by sponsors on a fixed schedule throughout the lifetime of an award. These reports provide the sponsor with assurance that project activities are moving forward according to the terms of the agreement. Typically, the PI is responsible for submitting timely progress reports to the sponsor, providing copies of all reports, along with the transmittal letter or email, to GMO. Failure to provide required reports can result in funding delays in multi-year awards, and early termination of the award by the sponsor, and can lead to the RF not being able to apply for any future awards. The RF is responsible for the submission of any required fiscal reports.
Extending Awards	Sometimes a project cannot be completed in the agreed-upon timeframe. In this case, the PI may need to request a no-cost extension to allow for time to finish the work. Requests for no-cost extensions: ● Usually include a justification and a projected budget that provides a spending plan for any unused funds ● Must be coordinated with OSP ● This should be done at a minimum of 60 days in advance of the award's termination date
Intellectual Property	The development of intellectual property is a natural and regular outgrowth of research programs and other scholarly activities being conducted across the SUNY system. Intellectual property includes anything marketable, such as inventions, books, articles, study guides, syllabi, workbooks or manuals, bibliographies, instructional packages, tests, video or audio recordings, films, slides, transparencies, charts, other graphic materials, photographic or similar visual materials, film strips, multimedia materials, three-dimensional materials, exhibits, and computer software. To **protect work from illegal copying,** these items can be **patented, copyright-protected,** or **trademarked.** The SUNY policy on intellectual property states that the RF is the owner of all intellectual property created through the use of SUNY resources or facilities, supported directly or indirectly by funds administered by RF, developed within the scope of employment by SUNY employees or agreed upon in writing to be a specially commissioned work. Exceptions to this ownership right are regular academic work products, work created solely for the purpose of satisfying a course requirement, work covered by a contractual agreement, and work resulting from outside consulting activities. OSP works with PIs to ensure that their intellectual property is identified and protected. To do so, PIs must disclose their discovery or development as soon as possible. It is a requirement on federal grants to disclose intellectual property developed under the grant. Contact OSR to assist in contacting the RF's Technology Transfer Office.
Closing Awards	Each sponsor establishes its deadlines for the submission of final financial and technical reports, as well as final invoices. Please be aware of and ready to meet these deadlines. Typically, the close-out process is smooth, provided that all reports and all expenses have been judiciously accounted for.

Appendix: Policies, Procedures, and Regulations

PIs and their teams are obligated to adhere to all policies, procedures, and regulations throughout the lifecycle of the award.

Policies and Procedures

RF policies and procedures may be accessed through this link. However, note that campus policies and procedures may vary slightly from, and supersede, RF policies and procedures. Contact OSP.

OMB Regulations

The U.S. Office of Management and Budget (OMB) serves as the backbone of all federal contracting and is generally the guidance document that can be referred to whenever questions arise. The RF is obligated to follow the regulations provided by the federal government.

2 CFR Part 200

Uniform Guidance (2 C.F.R. Part 200) establishes uniform administrative requirements, cost principles, and audit requirements for federal awards to non-federal entities.

Appendix: Subawards vs. Contractor

A subaward is likely appropriate if the answer is "yes" to any of the following questions:

- Does the entity's scope of work (SOW) represent an intellectually significant portion of the programmatic effort of the overall project?
- Does the entity have responsibility for programmatic decision-making?
- Could the entity's work result in intellectual property developed or publishable results (including co-authorship)?
- Will the entity need animal and/or human subject approval for its portion of the work?

RF's "Subrecipient vs. Contractor Decision Tree" is a helpful tool in making this determination.

The following information provides tips to distinguish a subaward from a supplier situation.

If the situation involves an …	The relationship is a …
Entity selling goods or services as part of their routine business operations, usually at a fixed price or rate (e.g., pipettes, tanks of hydrogen, etc.)	Contractor
Entity using human subjects or animal subjects (and needs both the subrecipient's AND campus' IRB or IACUC approval) to do their portion of the work	Subaward
Entity conducting a survey using de-identified data, and annual IRB approval is not required	Contractor
Entity who might be a legitimate author or co-author of a paper done on the project	Subaward
Invention arising from the work done by the subrecipient	Subaward
Entity performing a test on data we provide to them and who gives us the results to analyze	Contractor
Entity performing a test on data we provide to them and provides routine professional services in analyzing the results (e.g., a radiologist reading an X- RAY)	Contractor
Entity performing a test on data we provide to them and uses their professional expertise to contribute to generalized knowledge in new ways	Subaward

Other procurement actions may be appropriate when the contractor:

- Provides the goods and services within its normal business operations
- Provides similar goods or services to many different purchasers
- Operates in a competitive environment
- Provides goods or services that are ancillary to the operation of the RF-sponsored project
- Is not subject to compliance requirements of the sponsor

Appendix: Research Administration Acronyms

Listed below are common acronyms associated with sponsored programs:

Acronym	Name
AAAH	American Association for the Advancement of Humanities
AAALAC	American Association of Animal Laboratory Accreditation Council
AAAS	American Association for the Advancement of Science
AACUO	Association for Affiliated College and University Offices
AAU	Association of American Universities
ACC	Application Control Center
ACE	American Council on Education
ACLS	American Council for Learned Societies
ACO	Administrative Contracting Officer
ACS	American Cancer Society
ADAMHA	Administration on Drug Abuse, Mental Health and Alcoholism
AFDC	Aid to Families with Dependent Children
AFOSR	Air Force Office of Scientific Research
AHA	American Heart Association
AG	Attorney General
AID	Agency for International Development
AOA	Administration on Aging
ARI	Army Research Institute
ARO	Army Research Office
AUTM	Association of University Technology Managers
AVA	American Vocational Association
BAA	Broad Agency Announcement
BIA	Bureau of Indian Affairs
BLS	Bureau of Labor Statistics
CAS	Cost Accounting Standards
CASB	Cost Accounting Standards Board
CASE	Council for the Advancement and Support of Education
CBD	Commerce Business Daily
CFA	Call for Applications
CFDA	Catalog of Federal Domestic Assistance
CFP	Call for Proposals
CFR	Code of Federal Regulations
CIES	Council for the International Exchange of Scholars
CPB	Corporation for Public Broadcasting
CO	Contracting Officer
Co-I	Co-Investigator
Co-PI	Co-Principal Investigator
COI	Conflict of Interest
COP	Certificate of Proposal
COPLAC	Council of Public Liberal Arts Colleges
COS	Community of Science

Acronym	Name
COGR	Council on Governmental Relations
CURI	College and University Resource Institute
DARPA	Defense Applied Research Projects Agency (formerly ARPA)
DC	Direct Costs
DCA	Division of Cost Allocation (HHS)
DCAA	Defense Contract Audit Agency
DCE	Direct Cost Equivalent
DEA	Drug Enforcement Administration
DEAR	Department of Energy Acquisition Regulations
DFAR	Defense Federal Acquisition Regulations
DHHS	Department of Health and Human Services
DOD	Department of Defense
DOE	Department of Energy
DOEd	Department of Education
DOJ	Department of Justice
DOT	Department of Transportation
DUNS	Data Universal Numbering System
EAA	Export Administration Act
EAR	Export Administration Regulations
EDGAR	Educational Department General Administration Regulations
EDI	Electronic Data Interchange
EFT	Electronic Funds Transfer
EO	Executive Order
EHS	Environmental Health and Safety
EPA	Environmental Protection Agency
ERIC	Education Resources Information Clearinghouse
ERA	Electronic Research Administration
ERS	Economic Research Service
ESEA	Elementary and Secondary Education Act
ETA	Employment and Training Administration
F&A	Facilities and Administrative Costs (formerly Indirect Costs)
FAR	Federal Acquisition Regulations
FDAAA	Food and Drug Administration Amendments Act of 2007
FDP	Federal Demonstration Partnership
FFATA	Federal Funding Accountability and Transparency Act
FIE	Federal Information Exchange
FIPSE	Fund for the Improvement of Postsecondary Education
FMC	Federal Management Circular
FO	Funding Opportunity
FOA	Funding Opportunity Announcement
FOIA	Freedom of Information Act
FR	Federal Register
FOIL	Freedom of Information Law (NYS)
FSR	Financial Status Report
FY	Fiscal Year
GAO	Government Accounting Office
GEPA	General Education Provisions Act
GMO	Grants Management Office

Acronym	Name
GPRA	Government Performance and Results Act
GSA	General Services Administration GSL Guaranteed Student Loan
HEA	Higher Education Amendment
HEARS	Higher Education Administrative Resource Service
HED	Higher Education Daily
HENA	Higher Education and National Affairs
DHHS	Department of Health and Human Services
F&A	Facilities & Administrative cost/rate
HIPAA	Health Insurance Portability and Accountability Act
IACUC	Institutional Animal Care and Use Committee
IACP	Institutional Animal Care Program
IBS	Institutional Base Salary
IDC	Indirect Costs (now called Facilities and Administrative Costs)
IG	Inspector General
IHE	Institution of Higher Education
IP	Intellectual Property
IRB	Institutional Review Board
IREX	International Research and Exchanges Board
ITAR	International Traffic in Arms Regulations
LAR	Laboratory Animal Resources
MTA	Material Transfer Agreement
MTDC	Modified Total Direct Costs
NASA	National Aeronautics and Space Administration
NCE	No Cost Extension
NCES	National Center for Educational Statistics
NCURA	National Council of University Research Administrators
NEA	National Education Association
NEA	National Endowment for the Arts
NEH	National Endowment for the Humanities
NFAH	National Foundation on the Arts and Humanities
NIA	National Institute on Aging
NIA	Notice Inviting Applications
NIAAA	National Institute on Alcohol Abuse and Alcoholism
NICRA	Negotiated Indirect Cost Rate Agreement
NIDA	National Institute on Drug Abuse
NIE	National Institute on Education
NIH	National Institutes of Health
NIHR	National Institute for Handicapped Research
NOA	Notice of Award
NOFO	Notice of Funding Opportunity
NRA	National Rehabilitation Association
NRSA	National Research Service Award
NSF	National Science Foundation
OFCC	Office of Federal Contract Compliance
OGC	Office of General Counsel
OM	Operations Manager (RF)
OMB	Office of Management and Budget
ONR	Office of Naval Research

Acronym	Name
OSHA	Occupational Safety and Health Administration
OSI	Office of Science Integrity
OSP	Offices of Sponsored Programs
OSR	Office of Sponsored Research (Pre-award)
PA	Program Announcement
PD	Project Director
PETA	People for the Ethical Treatment of Animals
PHS	Public Health Service
PI	Principal Investigator
RA	Research Administrator
RDA	Recombinant DNA
RFA	Request for Applications
RFP	Request for Proposal
RFQ	Request for Quotation
SBA	Small Business Administration
SBIR	Small Business Innovation Research
SOW	Scope of Work
SPA	Sponsored Programs Administration
SRA	Society of Research Administrators
SRA	Sponsored Research Agreement
TDC	Total Direct Costs
TGA	The Grant Advisor
UG	Federal Uniform Guidance
UBIT	Unrelated Business Income Tax
USC	United States Code
USDA	United States Department of Agriculture

Appendix: Audits and Site Visits

Sponsors, by virtue of the fact that they are investing money in a sponsored award, are entitled to perform audits of all aspects of the award (financial and programmatic). The following is a list of audit types:

- Pre-award
- Financial statement
- Single audit – Subpart F – 2 CFR 200.501(b)
- OMB A-133
- Program Specific
- Special Review
- F&A Cost Proposal and Disclosure Statement
- Business System Review (accounting, procurement, property, etc.)

These audits may also be accompanied by site visits where the sponsor sends an individual or team to get a firsthand look at award activity to ensure that it is in compliance with the sponsor's regulations and the scope of work outlined in the funded proposal.

The RF is obligated to comply with any requests for audits and/or site visits. The RF will provide appropriate personnel and resources to the sponsoring agency to demonstrate compliance.

PIs must notify OSP as soon as they are informed of an audit or site visit.