February 4, 2015

Please note:

This **Principal Investigator's Handbook** was prepared by a team of sponsored programs professionals across the SUNY system, ranging from the University Centers at Buffalo, Binghamton and Albany to the inclusion of, *yes*, Old Westbury and select other predominantly undergraduate colleges.
(See page 2 for complete listing).

As you know, our campuses are not all alike; consequently, some of the procedures and policies of our campus may differ slightly from the procedures and policies espoused in this Handbook.
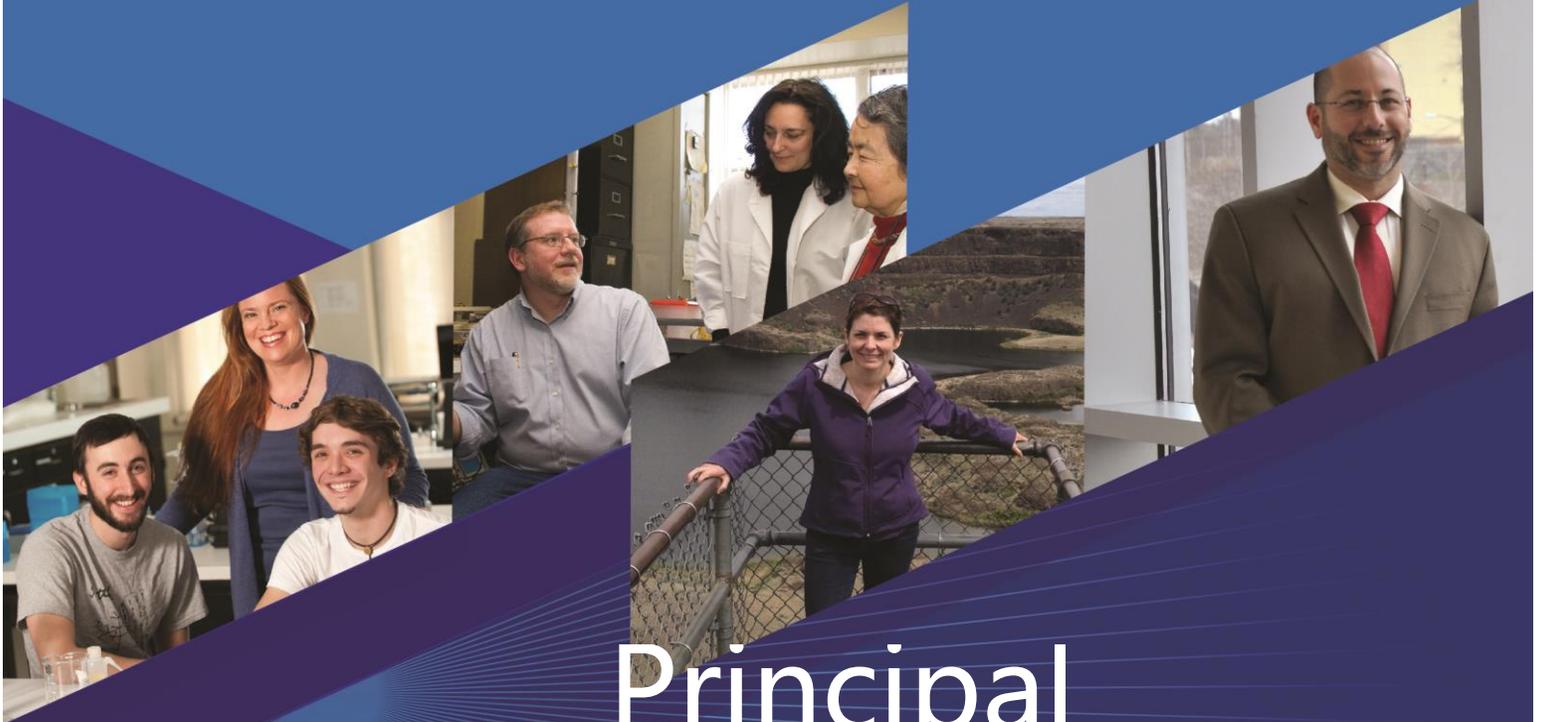
Principal Investigators Handbook

December 2014

SUNY **RF**

The Research
Foundation for
The State University of New York

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

SUNY Cobleskill

SUNY Old Westbury

SUNY Oswego

University at Buffalo

Upstate Medical University

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Introduction

Congratulations, you have taken 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 any Project Manager (PM), Principal Investigator (PI) or 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).
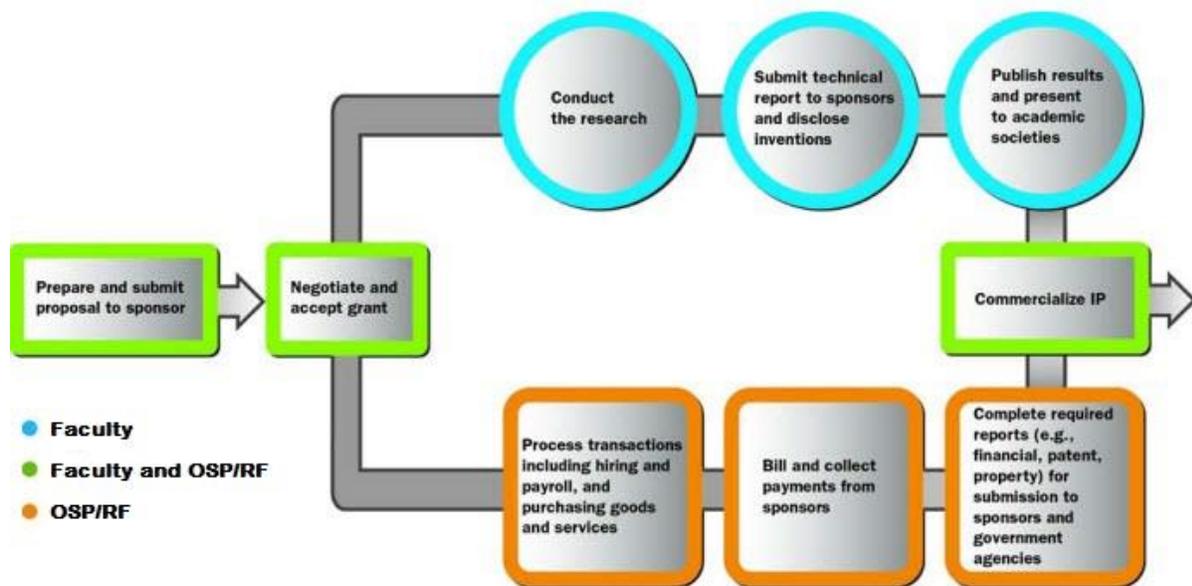
Figure 1.1 Lifecycle of a Grant

While the RF is the legal recipient of the award on behalf of the campus, YOU are accountable for the proper fiscal management and conduct of the project. If you fail to abide by the policies of the RF, the campus, or the sponsor, you may be held liable. The RF's central mission is to ensure that each PM, PI or anyone assisting those individuals has the necessary tools at his/her disposal to manage a successful project.

Using this Handbook

The structure of the *PI Handbook* replicates the lifecycle of your idea from concept to award close out. This handbook is not intended as a complete guide to grant application or sponsored program (SP) administration, but a guide to help you, the investigator, understand the most fundamental processes that affect the life of a sponsored project and direct you to the appropriate resource for your situation.

The reference materials provide concise explanations of the most common questions and issues. This guide will not explain every step or nuance involved in administering a sponsored project. This handbook provides links to important and detailed information to help you comply with federal and organization rules and regulations.

To mitigate any omissions of detail from the document, a few other additional items have been included:

- **Interactive appendix** – links to commonly referenced policies and procedures that govern sponsored research in both the RF/SUNY system and the federal government

- **Glossary of Acronyms and Terms** – a dictionary of sorts, defining common sponsored program, SUNY, and RF terms you may encounter while performing sponsored project administration

- **OMB Regulations** – information and link

Do not hesitate to contact your Sponsored Programs office should you need assistance in any phase of your project.

Campus Research/Sponsored Program Office Contacts

For you, the Principal Investigator, the first point of contact should be your campus' Research and/or Sponsored Programs office.

> **Thomas O. Murphy**
>
> **Office for Research & Sponsored Programs (ORSP)**
>
> **Campus Center, Room H-313C**
>
> **516-876-3215   murphyt@oldwestbury.edu**

General Information

The RF/SUNY Relationship and You

The RF was founded in 1951 to serve SUNY and to capitalize on its scope, scale and diversity as an engine of New York's innovation economy.

The largest, most comprehensive university-connected research foundation in the country, the RF supports nearly $1 billion in SUNY research activity annually, providing sponsored programs administration and innovation support services to SUNY faculty performing research in life sciences and medicine; engineering and nanotechnology; physical sciences and energy; social sciences, and computer and information sciences.

If you are new to the Research Foundation, or would just like to learn more, review the *Intro to Sponsored Programs* course.

Roles and Responsibilities

The RF is the legal recipient of the award on behalf of the campus. You are accountable for the proper fiscal management and conduct of the project.

Role	Responsibilities
Principal Investigator	When you function as a funded researcher, you assume fiscal and legal responsibilities. Each Principal Investigator is responsible for assuring that the terms of the award are met and the policies of the campus are followed. You must keep in mind that sponsoring agencies, your campus and your academic department are all stakeholders in your success and each may have specific requirements they wish fulfilled. Generally a PI 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 his/her department, administrative unit, and/or campus in the case the project is over extended or an unauthorized expenditure is disallowed by the auditors* *In such cases the academic unit must cover the cost

Role	Responsibilities

Campus Sponsored Programs office	All SUNY campuses have a dedicated staff that assists in the development and submission of new grant proposals.
	
	The primary mission of each Research and/or Sponsored Programs office (SP)* is to promote extramural funding of research and scholarly activity and to help you, either individually or as part of a group, by
	
	• Providing administrative services to help meet the requirements of the sponsor, Research Foundation and the campus
	
	• Ensuring you are protected from any undue harm prior to the acceptance of a sponsored program
	
	• Verifying that the project does not
	   o Challenge institutional integrity
	   o Threaten your academic freedom, or
	   o Overburden you 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, the Research Foundation and the funding agency
	
	Office names vary by campus

Research Foundation	The Research Foundation is the legal recipient of the awards administered by them. The RF assists campuses and faculty by: • Review, negotiation, and acceptance of sponsored agreements on behalf of campuses • Management of central accounting functions including billing and fiscal reporting to sponsors • Compliance assistance

Additional Involved Parties

In addition to your responsibilities, the below parties are or may be involved in your project.

- **Operations Manager** (OM) and/or **Deputy Operations Manager**:
  Reporting to The Research Foundation President (RF), the Research Foundation Operations Manager (OM) serves as the top level Research Foundation executive on campus and is responsible for supporting SUNY's research mission and the successful implementation of the RF's strategic plan. The campus president nominates an individual from the campus to be considered for the OM role. The OM is responsible for all Research Foundation operations on campus, including;
  - o sponsored program administration services to the SUNY community (faculty, students, and staff) and stewardship to our sponsors
  - o creating an environment to support and increase sponsored program funding
  - o creating an environment to increase 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. In this secondary role to the PI, a Co-PI:
  - o Provides leadership over a specific task of the project
  - o Coordinates with his/her Research Foundation, if at another institution
  - o Coordinates necessary approvals, if at other institution
  - o Contributes to managing the project and any reporting requirements

  The appointment of Co-Principal Investigators does not supplant the need for one individual to be designated as "corresponding" investigator.

- **Collaborator**:
  A person or entity typically *volunteering* some effort to conduct one minor task, measurement, or analysis. He or she is not compensated and is not involved in management or reporting if a project is funded. He or she may be asked by a sponsor for a letter explaining contribution to the project.

- **Sponsor**:
  A sponsor is a person or entity who funds the sponsored program. There are three main types of sponsors.
  - o Federal agencies
  - o Other government agencies (state or local government)
  - o Private entities such as foundations, corporations or individuals

Starting Out: Proposals and Funding

Overview

You have 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.

Your Research/Sponsored Programs office can assist you in all aspects of any phase during the grant process.
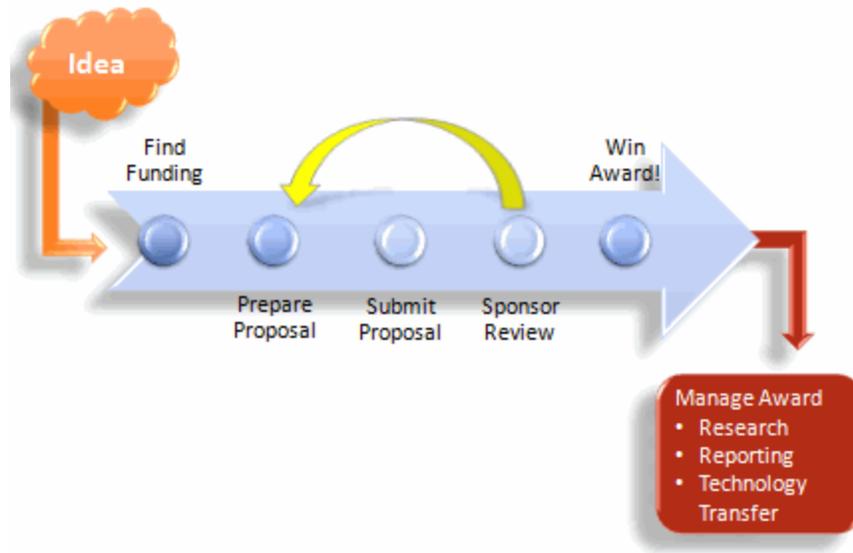

Figure 3.1: The Grant Process

Developing a Concept

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

What is a "good" idea?

For research, a good idea is one which adds to the general knowledge base, brings a new perspective or fills holes to previously conducted research. For other types of projects, the good idea may fill a need for the institution or the community at large. A thorough literature review will be essential to provide the background and rationale for your work.
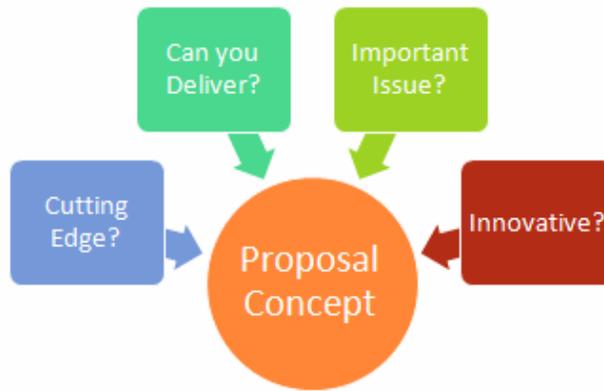
Figure 3.2: Proposal Concepts Must Be…

Preparing a strong proposal requires a significant investment of time, ingenuity, and energy. The sections below will help you focus your efforts on specific principles helping you accomplish this goal. A host of factors impact the probability of success. It is best to use each suggestion as a guideline and not as a hard and fast rule. Knowing how to draft a good proposal and having the time to do it may be two separate things. Be sure you have a sound plan prior to putting the application together; this will help make certain you do not run out of time or get discouraged and rushed in the proposal preparation process.

> "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

Proposals should be concise if responding to a solicitation. Contact the program officer at the sponsoring agency for details as you develop your concept and subsequent proposal. Also consider getting input from peers prior to discussing new lines of research you have developed. If your proposal is petitioning for unsolicited funding, you still need to meet some basic guidelines; your idea's impact on your industry or the community as a whole, expertise available and needed, the cost effectiveness of your plan, and how you will evaluate and disseminate findings.*

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

Check out some useful resources to help you prepare a proposal

- In the Information for Researchers and Administrators section of the *RF Home* page, click on [Sponsored Program & Business Development Funding](). (Scroll to the bottom for some self-paced resources)
- Check with [SUNY Center for Professional Development]()on the next session of the *Grants and Proposals: If You Write It, They Will Fund*, a virtual (SUNY) instructor-led course.

Clearly Identify Your Idea

Having a clear and concise plan of how to carry out your project will help you *scale* your project. Each potential funder will want to know how far along your project is in development, what your intended goals and objectives are (both short and long term), why is the idea important or revolutionary, how much will the project cost (not just in the short term), and how long might it take until progress is made. Knowing, or at least attempting to answer, a majority of these questions will help you bring attention to your project's potential. Creating enthusiasm for your idea helps get funders behind your work. Also, being aware of the current stage of your idea will determine which solicitations are best to pursue. So, this exercise is important to undertake prior to beginning to respond to a solicitation in earnest.

Looking for Funding

The best and most logical first step is locating funding for your idea(s). You probably already have a good idea, from past experience or working with mentors, of agencies and foundations typically providing support for your area of interest. Below are the common resources for finding funding.

View Common Sites

Funding options are listed on the RF web site. In the Information for Researchers and Administrators section of the *RF Home* page, click on Sponsored Program & Business Development Funding.

- **Public Funding** sources such as Federal and State Government agencies (e.g., www.grants.gov or www.NYSTAR.state.ny.us)

- **Private Funding** sources, many noted in the Foundation Center database (www.foundationcenter.org)

Searchable databases provide many options to focus on your area of interest. One example, to which the RF and SUNY subscribe, is the *Community of Science Pivot* database.

> **COS Pivot Database – The RF/SUNY suggested site**
>
> This database combines funding opportunities and professional profile components. The funding database is a comprehensive listing of opportunities from federal, state, and private sponsors both national and international.
>
> - Build a profile at http://pivot.cos.com/; a short, but valuable, investment of time.
> - Identify specific keywords associated with your research interests.
> - Set up email notifications for new opportunities that meet your search criteria.

While the COS Pivot database does provide information on some private foundations, there are more comprehensive databases strictly targeting these opportunities. A free resource is Guidestar.

More detailed and user friendly databases are available from The Foundation Center and Metasoft, however these sites require paid subscriptions. Consult with your Sponsored Programs or Development office to determine if the campus has a subscription to one of these databases.

Locate Fresh Leads

Even if this is the case, you have opportunities to locate some fresh leads starting with the resources on the Connect, Collaborate, and Find Funding webpage:

- **Mentors/Peers** – who in your field has had success? Are they willing to speak with you about your project? This is probably the most underutilized resource available. Advisors and former co-workers (post-docs and fellow graduate students, etc.) can also serve as a good place to start to identify previously untapped resources.

- Leverage the capacity of the SUNY research community and support SUNY and the Entrepreneurial Century with Find a SUNY Scholar, a database of more than 21,000 profiles of SUNY faculty experts.

- Access the SUNY Distinguished Academy to connect with faculty having achieved the highest level of academic excellence, a rank that can only be designated by the Board of Trustees.

- **Professional Journals** – all publications stemming from funded research must provide a notation of who supported the work. If you see a project that is similar in nature to yours it may be beneficial to make contact with that funder, or at least review the programs they offer for support on a regular basis.

- **Professional Conferences** – much like professional journals, conferences offer detailed information about sponsors in your area of study. Take note of each and do a little research on funding opportunities that may help you succeed in your search. Look for sponsor officials who may be attending the conference.

Identify a Good Solicitation

Once you identify a potential solicitation it is prudent to begin assessing the likelihood of your chances for that specific solicitation; this will help you select only the best candidates for funding your projects. The best way to do this is to get to know the sponsor.

- Know the sponsors priorities: find out which specific areas they are funding and match them with your own research priorities.

- Know what types of proposals have been previously funded: look at their annual report to see who they have been funding, and if the awarded grants were for programs similar to yours.

- 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 your project with you and how it would or wouldn't fit into their program, and possibly even read a summary or draft of your proposal.

- Read the sponsor's guidelines and procedures: This is where you should call upon the resources of your Sponsored Programs office. Typically they can give you some insight about a specific solicitation. You may also want to ask if other investigators at your institution have been successful.

Award Types

Consider the type of award agreement you are considering entering into with a sponsor. Types of awards include:

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

- No substantial involvement is anticipated between 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**.
- **Deliverables** of any kind, including the sharing of research results.
- 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**.
- Principal purpose is for direct benefit or use by the sponsor.
- The sponsor requires **formal reports of any kind**, 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 post doc 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 an agreement between your institution and another where you are not the primary award recipient. Typically, in these agreements, you are performing a piece of a larger project which was awarded to the other institution. A subcontract specifies the terms between the two institutions and outlines what you are expected to do as well as provides the budget for your work.

Other types of agreements are Cooperative Agreement, Clinical Trial, Vendor, Data Use, Material Transfer, or Consulting agreements. All of 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 your Sponsored Programs office. They can guide you 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 your chances of getting funded.

No one wants to have their application 'rejected without review' for a technicality. Reviewing and preparing your application according to these instructions will guarantee that your application is reviewed. In turn, each application announcement draws a very high number of responses.

NSF
40,000 proposals submitted [1]

~11,000 funded

NIH
49,592 proposals submitted

~17.7% funded[2]

(1) Includes research, education, and training projects   *(2) Data for 2011*
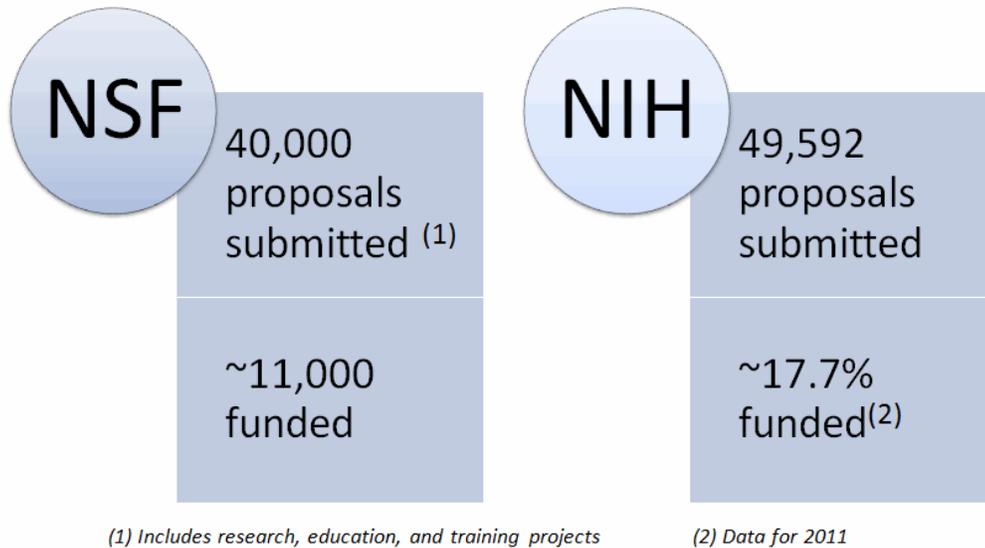
Figure 4.1 Application Statistics from 2011

Application Guidelines

All solicitations post specific guidelines on how applications must be prepared for sponsor review. Start with a logical outline. Develop an outline that either follows the specifics or one that leads the reviewer from significance to specifics of proposed activity.

Some proposal guidelines prescribe *sections*; if so, <u>DO NOT</u> deviate from them. It is imperative that you follow the instructions each sponsor posts. These instructions outline the very specific ways in which an application must be developed.

The next figure identifies the general components of both a research and a humanities or training grant proposal.

Research Grant Proposal

Statement
- Big Picture
- Specific Research Question

Intro and Background
- Literature review
- Knowledge (current and gaps)
- Techniques and strategies

Research Plan
- Strategy
- Objectives, hypotheses, etc.
- Timetable
- Outcomes

Budget
- Budget ($$)
- Budget Justification

Humanities Grant Proposal

- Problem and Significance Statement
- Intro and Background
- Proposal Specifics
- Implementation Specifics
- Expected Outcomes
- Budget and Budget Justification

Figure 4.2: Research Grant Proposal vs. Humanities Grant Proposal Components

Key Components

Take special note of the sections given below. These are components that should be thoroughly reviewed with your Sponsored Programs office to reduce any errors or surprises later in the process if your project is funded.

Budgeting

Developing a budget can seem like an intimidating and daunting task; it needn't be. Your Sponsored Programs administrator is well versed in how to draft a budget. The administrator will know how to calculate some of the costs, what can and cannot be included, and help ensure that you haven't forgotten any potential costs. A proposal budget typically consists of two parts: the *budget form* and the *budget justification*, where you provide an explanation for how you arrived at the figures given on the form.

Some basic tenets are:

- All costs need to be **reasonable**. You must make sure your costs reasonably reflect what is needed to complete your project.

- All costs must be **allowable**. There are some rules regarding what are allowable costs. Talk with your Sponsored Programs administrator to identify those rules.

- All costs must be **allocable**. This means that the costs must be used to solely advance the work of *this* sponsored project, if awarded.

Good budget development ensures you have the financial resources to complete your project as proposed and, if awarded, limits the potential for difficulties in post-award fiscal management. To help you begin the development of your budget, below is a list of the more common budget items and some guidance for each.

Personnel Costs

The RF is legally obligated to properly classify workers based on the criteria listed below. *You* are 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 budget employees and consultants using the following guidelines:

- **Employee versus Consultant**
  In general an *employee* is someone whose primary employment is as a New York State or Research Foundation of SUNY employee.

  A *consultant* does not have a state or Research Foundation 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, or establishment of a clinical trial protocol on behalf of a clinical research organization. Typically, a consultant is not a New York State or Research Foundation of SUNY employee.

- **Institutional Base Salary**
  The actual base salary of the individual who will work on the project. Do not guess at this figure, your Sponsored Programs office will be able to access this information and provide you with the most up-to-date and accurate figure. In your justification be sure to explain, in some detail, why the individual was chosen for the work.

- **Fringe Benefits**
  A benefits package for being employed by the institution. Most employees of a project will receive fringe benefits. Carefully consider the time frame of the project. This will allow you to determine which fringe benefit rate to use. Do not undersell this value.

  When an award is made, the fringe benefit rates in place at the time the expenditure occurs will be assessed. So regardless of how you initially budget a project, the current rate will apply, so it is in your best interest to use the *projected* fringe rates.

The cost of personnel to conduct a project is typically the largest and most important component of any budget.

Equipment

The federal definition for equipment is something with a useful life of one year or more and with a unit cost of $5,000 or more. Some sponsors will have different criteria for equipment which you will need to use. Items with a lower cost, including computers, should be included in the materials and supplies budget line.

Tuition Remission

If you are including a student research assistant as part of your research team, you can budget for tuition remission.

Subrecipient (Subaward) versus Contractor

Budgeting a sub-awardee versus an independent contractor is similar to the dilemma posed by budgeting an employee versus a consultant. What to consider in this situation only differs in that:

- A sub-awardee is 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 your overall project.

- A contractor will provide goods or services which will not require any "new" intellectual contributions to complete the work. Keep in mind that any work contracted will be fully owned by the Research Foundation, 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.

See *Appendix: Subawards versus Contractor* for decision making assistance.

Materials and Supplies

Materials and Supplies are the costs you need to perform the experiments or field work of the project.

When developing your budget it is best to also develop a detailed justification to complement the amounts you are requesting. Succinct descriptions of not only the cost but what is necessary will ultimately make your efforts successful.

All sponsors want to know that the funds will ultimately be spent. Give them a reason to choose your project over another team. Time and again reviewers highlight a lack of detail about a budget to know if the costs are efficient and an effective use of money.

Travel Expenses

Conference and research travel are common aspects of many sponsored awards.

The RF cannot reimburse above the Federal per diem rates unless there is acceptable written justification showing how the award benefits from this additional cost.

For example, if a conference is being hosted at a hotel and there is a published, negotiated conference rate (higher than the per diem), the RF can reimburse at the conference rate with documentation.

Conferences	If you need to travel internationally, check with your Sponsored Programs officer before making any travel arrangements. There could be restrictions on foreign travel based on sponsor policy or other Federal regulations, including export controls.
Flight Information	Flight reservations can be made either directly with the airline, through a website, or through a University-approved travel agent.
	Utilizing these agents will enable the expense to be directly billed to the RF and will eliminate the need to charge a personal credit card and wait for reimbursement.
Travel Reimbursements	All requests for travel reimbursement require original detailed receipts.
	• Conference travel requires proof that the traveler actually attended the conference. Acceptable proof is a copy of your conference name tag or a copy of the conference brochure.
	• Travel for meetings requires a copy of the written agenda.

Subject Costs (Human or Animal)

Sometimes awards provide payments to human subjects as an incentive for them to participate in the study.

If you intend to supply gift cards, cash, or other non-cash incentives be sure to discuss, with your Sponsored Programs officer, how to handle these payments shortly after your project account is established.

Direct vs. Indirect Costs

The Indirect Cost, referred to as Facilities and Administrative (F&A) cost, is comprised of negotiated costs an institution contributes to a project, and is thus reimbursed for those expenses. Costs include everything from lighting, administrative personnel expenses, computer networks, telephone services, etc.

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.

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*

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

It is important that you consult your Sponsored Programs office about any cost you include as a direct charge. The staff will help you determine how to best proceed in what should be and should not be a direct cost for your project.

Indirect costs are calculated as a percentage of your direct costs. You need to contact your Sponsored Programs office to find out the percentage to use and the direct cost base your campus has negotiated.

Other budget considerations include project evaluation, participant support costs, insurance, project specific audit costs, and more. Again, work with your Sponsored Programs office to project your budget.

Budget Justification

Your project will be a success when you have the resources to adequately cover your costs. As we all are aware, federal, state, and even private funders are taking issue with rising research costs. Keep this fact in mind when constructing your project budget and justification. In your budget justification you want to show, in as much detail as possible, why certain costs are necessary to conduct the project. Providing a good rationale on certain items can help you provide more transparency to the application reviewers.

Compliance

Most research involves compliance with some federal laws and regulations governing the conduct of the work. Below is a list of the more common regulatory areas affecting federally funded research projects.

This is not an all-inclusive list so your work may involve laws and regulations that are not mentioned here. If there are any questions or concerns about any regulatory issues you should contact your Sponsored Programs office.

Human Subjects Protections	All human subjects research, federally funded or not, must be reviewed by your campus's Institutional Review Board (IRB). Many proposal applications will ask if the research proposed involves human subjects and, if so, request the IRB approval date. Be sure to know well in advance the IRB protocol review schedule so that you can be sure to have a complete review prior to the proposal deadline.
Animal Protections	All research involving animals, federally funded or not, must be reviewed by the campus 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 sure to know well in advance the IACUC protocol review schedule so that you can be sure to have a complete review prior to the proposal deadline.
Conflict of Interest	To ensure the validity of your research it is imperative that there be no personal financial conflict of interest, real or apparent. Be familiar with your institution's conflict of interest policy. Also be aware of your prospective sponsor's conflict of interest requirements. Some sponsors, particularly those in the Public Health Service, have stringent requirements of which you need be aware.
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 your research involves the use of individual medical records you need to be familiar with the 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 U.S.
	Prior to taking any piece of research equipment out of the U.S or sharing it domestically with a foreign national. You need to determine if it falls under any of these lists. If so, you will need to get a license prior to leaving the country.
	Since obtaining a license can be very time consuming, you will need to check in with your Sponsored Programs office early to determine 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 prior to taking the appropriate protections could limit our ability to commercialize research results.
	Please consult your Sponsored Programs officers during the application for consistency.
Research Misconduct	Fabrication, falsification or plagiarism in proposing, performing and reviewing research or in reporting research results constitutes research misconduct.
	Your campus has a policy and procedure for handling research misconduct. You should become familiar with both in the event that you are a witness to such conduct.
Use of Hazardous Material, Blood-Borne Pathogens	Campuses conducting research where these materials are used have committees that ensure that they are used appropriately and will not pose a hazard to the research subject, researchers, or the community at large.

Compliance Training Resources

The RF provides resources to you and your project staff to learn about regulations and compliance standards. Your course completion is tracked, giving verifiable proof to sponsors of your knowledge of the subject areas.

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

WeComply: A system-wide license for all RF- affiliated campuses to access general business compliance training including Sexual Harassment Prevention, Financial Conflict of Interest, Workplace Violence, Business Etiquette and more.

Contact your Sponsored Programs office if you need assistance accessing these tools.

Submitting Proposals

Overview

Representatives in your OSP office are designated by the Research Foundation as the primary signatory on all applications submitted on behalf of SUNY Campuses; your campus will review prior to the submission of an application.

Provide a full copy of your application at least a few business days prior to a submission deadline. It is always helpful, if possible, to give your OSP office a few days' notice before sending the application for review.

- An **institutional document of compliance**. Although this document goes by a myriad of names and formats, you must follow the format and get the appropriate signatures that are required by your campus Sponsored Programs office. This document is the lone item that gives your OSP office the final approval to submit your application.

  This document requires you, as the PI, to identify the basic elements of your application. (Examples: What is the title? Do you have animal or human subjects? Who will be the sponsor for your proposed work? Do you have additional PIs or Co-PIs.)

  These internal documents are vitally important in ensuring compliance with federal and campus policies. Be sure to get this document done early in your application process, as it is relatively simple to complete and easy to get out of the way early.

- **Additional Institutional Requirements**. Each SUNY campus may require additional components to be included with your application prior to review. Contact your Sponsored Programs office for specific campus requirements.

  Reviewing the guidelines for additional criteria is a normal component of review prior to an application being submitted. Getting an idea of what is missing early, and identifying who will assist you is crucial to your success.

Award Acceptance and Negotiation

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

The agreement terms specify the amount of the award, the start and end dates of the grant, any reporting requirements, and deliverables expected at the end of the grant period, and will outline any other requirements the sponsor may have.

Post-Award Management

Overview

Congratulations on receiving your award! The intent of this section is to provide guidance on the financial and other post-award administration of your project. Keep in mind that the material discussed below is not intended to be a comprehensive review of all issues that may arise. You should contact your Sponsored Programs office whenever you have concerns or questions.
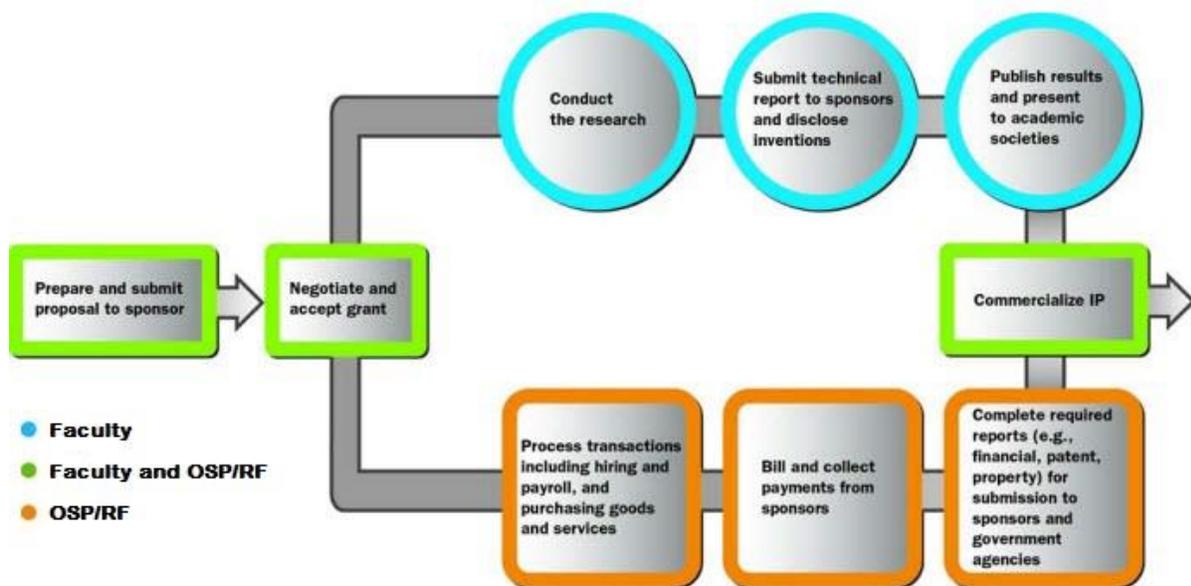
Figure 6.1 Lifecycle of a Grant

Revisiting the grant lifecycle above, there are processes assigned to you, the PI, and the RF either through the RF central office or by representation of your campus Sponsored Programs office. Your campus Sponsored Programs office is there to assist you in keeping on track with your research and sponsor requirements. In the end, remember, you are still accountable for all requirements.

Award Establishment

The Research Foundation will create a project specific account, after your 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.
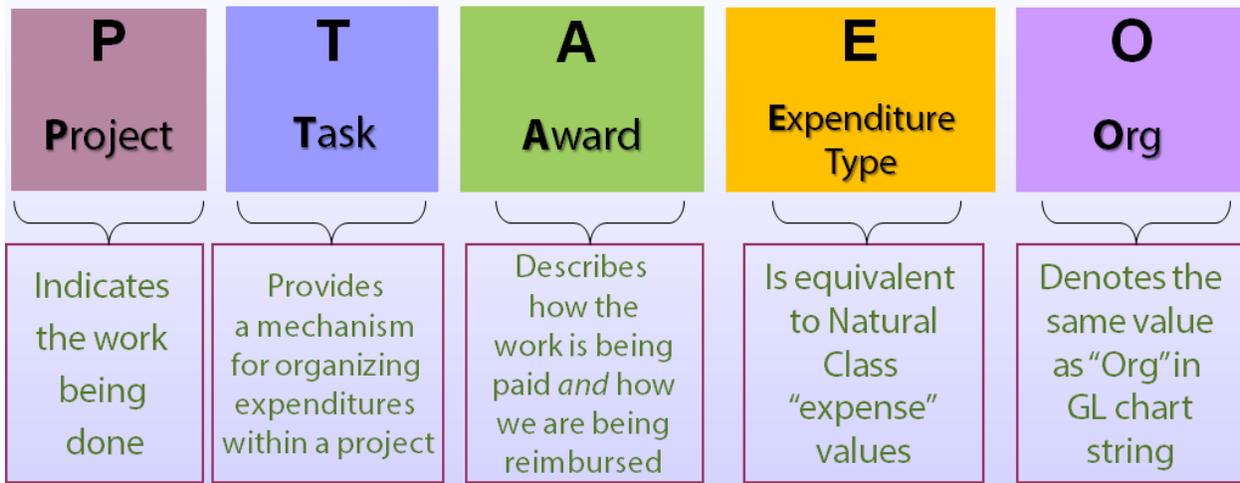
Figure 6.2 PTAEO Breakdown

This specific account is created to track all project expenditures. You will be notified when the account is established.

Prior to any account establishment, the Sponsored Programs office verifies all appropriate compliance approvals are complete.

Monitoring Sponsored Award Financial Activity

The RF offers multiple web-based tools within the RF Report Center to allow you to monitor the financial activity of your sponsored award(s). Both the *PI Dashboard* and the *RF Activities Interface Reporting tool* (RF AIR) provide you with (or others whom you designate) the ability to see the award's budget, what has been spent, what is encumbered, and what balance remains in each budget category. In order to access these systems, contact your campus sponsored programs office for assistance.

You are responsible for verifying payment of all expenses submitted and ensuring there are no unauthorized charges against the award. For this reason, we recommend that you (or your designee) reconcile the activity of the account on a *monthly* basis.

Awarded Budget Revisions

As you are aware, your 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. The *RF AIR* is an effective tool to help with this.

It is not uncommon to need budget category revisions. In this case, you, as 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 you need to modify your budget you must work with your Sponsored Programs office to make these modifications.

Key Award Considerations

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

Project Specific Personnel

Hiring project staff may be a necessity to complete your work. The Research Foundation complies with applicable laws and regulations that have been established to maintain salary and wage equity and for the consistent treatment of all 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, you *must* contact your campus Human Resources Department to ensure you are complying 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 ensure time worked and time off are accurate. Questions regarding employee appointments and time reporting should be addressed to the campus Human Resources office.

If there are any changes to the employee status, the PI must approve these as well. The employee appointment and change of status forms must be completed in a timely manner 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 your effort you must contact your Sponsored Programs office immediately. Changes to effort generally have a ripple effect through the budget and can significantly affect the terms of your research agreement.

You will be required to certify your effort and the effort of your 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) two or three times per year, depending on your campus. Certifying effort requires that you, 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.

Contact your Sponsored Programs office for additional information.

Purchasing

The Research Foundation must ensure that all expenditures comply with sponsor, RF and campus guidelines. In addition, in accordance with *federal requirements* all expenditures must be **reasonable**, **allowable** and **allocable** to the sponsored project. The roles of purchasing and accounts payable staff are to assist you 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 to you as quickly as possible. You will want to ensure funds are available to support the purchases.

Travel

Travel plays an important role in many sponsored projects. Some sponsors may have specific travel conditions or restrictions that you must abide by. Principal Investigators are responsible for certifying that all travel undertaken in connection with sponsored projects are made for the express purpose of carrying out the project objectives. Individual travelers are responsible for the appropriate use and accurate accounting for travel funds provided to them, as well as for compliance with sponsor and RF policies. Therefore, prior to leaving on any trip, it is best to consult with Sponsored Programs staff to ensure you have accurate information and necessary approvals.

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.

Prior to initiating a cost transfer you should contact your Sponsored Programs office for guidance.

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, you, as the PI, are responsible for making sure

- All progress reports are submitted to the sponsor on time
- Copies of all reports, along with the transmittal letter or e-mail, have been provided to the Sponsored Programs office

Failure to provide required reports can result in funding delays in multi-year awards, early termination of the award by the sponsor, and can lead to the Research Foundation 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, you 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 your sponsored programs officer

- 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 that 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, multi-media materials, three-dimensional materials, exhibits, and computer software.

To **protect your work from illegal copying,** these items can be **patented, copyright protected,** or **trademarked.**

The SUNY policy on intellectual property states the Research Foundation is the owner of all intellectual property created through the use of SUNY resources or facilities, supported directly or indirectly by funds administered by the Research Foundation, developed within the scope of employment by SUNY employees or agreed 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.

Additionally, it is a requirement on federal grants to disclose intellectual property developed under the grant. You should contact your Sponsored Programs office regarding compliance with this requirement.

Your campus wants to work with you to ensure that your intellectual property is identified and protected. In order to do so, you must disclose your discovery or development as soon as possible. If you are located at a university center or medical university, you should contact the technology transfer office at your campus to discuss and disclose your discovery. If you are located at one of the SUNY colleges, contact your Sponsored Programs office, who will put you in contact with the Research Foundation Technology Transfer Coordinator.

Closing Awards

Once the award period officially ends, each sponsor establishes its own 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

You are obligated to adhere to any and all policies, procedures and regulations throughout the lifecycle of your award.

Policies and Procedures

Access the RF policies and procedures through the links below:

- RF Policies
- RF Procedures

Campus policies and procedures may vary slightly from, and supersede, RF policies and procedures. Contact your campus Sponsored Programs office for guidance.

OMB Regulations

The U.S. Office of Management and Budget (OMB) serves as the backbone of all federal contracting and are generally the guidance documents that can be referred to whenever questions arise.

The Research Foundation has an obligation to follow the regulations provided by the federal government.

2 CFR Part 200

On December 26th, 2013 the US Office of Management and Budget (OMB) issued final guidance on Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards. The final guidance supersedes and streamlines requirements from OMB Circulars A-21, A-110, A-133 and 5 other circulars. 2 CFR Part 200 will be effective for new awards and for selected funding increments issued on or after December 26, 2014. There will be a transition period where both the previous OMB Circulars and 2 CFR Part 200 will be applicable.

OMB Circulars

- Circular A-21 establishes principles for determining costs applicable to sponsored awards
- Circular A-110 establishes the requirement to consistently and uniformly apply principles Therefore, the principles of A-21 are applied to all Research Foundation accounts, regardless of the sponsor or source of funds
- Circular A-133 establishes the basis for audit requirements and standards

  To ensure compliance there is an annual A-133 audit. In this audit, the financial systems are reviewed and a final report is offered to identify the Research Foundation's compliance with A-

133's standards. The report is filed with the federal government, and made available to anyone looking to do business with the Research Foundation.

Appendix: Subawards versus Contractor

A subaward is likely appropriate if you can answer "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 subjects approvals for its portion of the work?

The following information provides tips to distinguish a subaward from the 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 whom 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: Acronyms

Listed below are common acronyms you may see over the lifecycle of your sponsored program. This is only a portion of the full list. Access the full [RF Acronyms and Common Terms list here](#).

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
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
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
CFDA	Catalog of Federal Domestic Assistance
CFR	Code of Federal Regulations
CIES	Council for the International Exchange of Scholars
CPB	Corporation for Public Broadcasting
CO	Contracting Officer
COP	Certificate of Proposal
COS	Community of Science
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
DOT	Department of Transportation
EDGAR	Educational Department General Administration Regulations
EDI	Electronic Data Interchange
EFT	Electronic Funds Transfer
EO	Executive Order
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
FDP	Federal Demonstration Partnership
FIE	Federal Information Exchange
FIPSE	Fund for the Improvement of Postsecondary Education
FMC	Federal Management Circular
FOIA	Freedom of Information Act
FR	Federal Register
FSR	Financial Status Report
FY	Fiscal Year
GAO	Government Accounting Office
GEPA	General Education Provisions Act
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
HHS	Department of Health and Human Services
IACUC	Institutional Animal Care and Use Committee
IACP	Institutional Animal Care Program
IDC	Indirect Costs (now called Facilities and Administrative Costs)
IG	Inspector General
IHE	Institution of Higher Education
IRB	Institutional Review Board

IREX	International Research and Exchanges Board
LAR	Laboratory Animal Resources
MTA	Material Transfer Agreement
MTDC	Modified Total Direct Costs
NASA	National Aeronautics and Space Administration
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
NIAAA	National Institute on Alcohol Abuse and Alcoholism
NIDA	National Institute on Drug Abuse
NIE	National Institute on Education
NIH	National Institutes of Health
NIHR	National Institute for Handicapped Research
NRA	National Rehabilitation Association
NRSA	National Research Service Award
NSF	National Science Foundation
OFCC	Office of Federal Contract Compliance
OMB	Office of Management and Budget
ONR	Office of Naval Research
OSHA	Occupational Safety and Health Administration
OSI	Office of Science Integrity
PA	Program Announcement
PETA	People for the Ethical Treatment of Animals
PHS	Public Health Service
PI	Principal Investigator
RDA	Recombinant DNA
RFA	Request for Applications
RFP	Request for Proposal
RFQ	Request for Quotation
SBA	Small Business Administration
SPA	Sponsored Programs Administration
SRA	Society of Research Administrators
TDC	Total Direct Costs
TGA	The Grant Advisor
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 first-hand 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.

You must notify the Sponsored Programs office as soon as you are informed of an audit or site visit.

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