Policies & Procedures Manual
Alabama A&M University Mission Statement

Alabama Agricultural and Mechanical University reflects the uniqueness of the traditional land-grant institution which combines professional, vocational and liberal arts pursuits. The University provides baccalaureate and graduate studies that are compatible with the times to all qualified, capable individuals who are interested in further developing their technical, professional, and scholastic skills and competencies. It operates in the three-fold function of teaching, research, and public service, including extension. A center of substance and excellence, Alabama A&M University provides a setting for the emergence of scholars, leaders, thinkers, and other contributors to society. Specifically, the University is committed to:

1. Excellence in education and a scholarly environment in which inquiring and discriminating minds may be nourished.
2. The education of students for effective participation in local, state, regional, national, and international societies.
3. The search for new knowledge through research and its applications.
4. The provision of a comprehensive outreach program designed to meet the changing needs of the larger community.
5. Programs necessary to adequately address the major needs and problems of capable students who have experienced limited access to education.
6. Integration of state-of-the-art technology into all aspects of University functions.

Alabama A&M University, in cooperation with businesses, industrial and governmental agencies, and other institutions, provides a laboratory where theory is put into practice in a productive environment.

OSP Mission Statement

The mission of the Office of Sponsored Programs (OSP) at Alabama A&M University is to:
Serve as an advocate for sponsored research; Advise the administration of matters of regulatory compliance; Assist faculty in finding funding opportunities; Assist faculty with the development of proposals; and Promote internal sponsorship of scholarly activities.
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**I. INTRODUCTION**

**What is a Sponsored Program?**

A sponsored program is any activity supported by external funds awarded to the University as a result of some formal communication. The communication may be a contract, a letter, an application, or a written proposal signed by an authorized University official. Such communication must be reviewed and processed by the Office of Sponsored Programs. Typically, a sponsored program also has one or more of the following attributes:

- Award is contingent upon the University accepting specific staff performance and/or achieving specific performance targets
- A line item budget with restrictions on the transfer of funds among budget categories
- Requirement for programmatic or technical reports
- Requirement for fiscal report or external audit
- Provision for the disposition of intangible property such as patents, copyrights, inventions, and licenses, which may result from the activity

Excluded from this definition of Sponsored Programs are the following:

- Gifts and bequests to the University
- General Development campaigns which result in funds collected by the Alabama A&M University Foundation
- Student financial aid (except as it is provided by a sponsored project)
- Direct payments to individuals such as faculty, staff and student salaries, stipends and fellowships
Federal awarding agencies may use any of the following legally binding instruments to provide extramural funding for sponsored research and projects: grant, cooperative agreement or contract. In each instance the agency decides on the appropriate award instrument.

The distinctions among these instruments are explained in OMB Circular A-110: Uniform Administrative Requirements for Grants and Agreements with Instructions for Higher Education, Hospitals, and Other Nonprofit Organizations.

A grant is used when the principal purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute. Substantial involvement between the sponsor and the recipient is not expected when carrying out the activity. The exact course of work and its outcome cannot be defined precisely.

A cooperative agreement is used when the principal purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute, and substantial involvement between the sponsor and the recipient is anticipated during the performance of the work. The nature of the involvement can be defined and specified in advance.

A contract is used when the primary purpose of the transaction is acquisition of property or services for the direct benefit or use of the Federal Government involvement.

Why Sponsored Programs?

A significant proportion of the funds that the University uses to support research, enhance its facilities, develop new academic programs, prepare students for the global marketplace and undertake other developmental, training and educational activities for the public good are derived from extramural sources. For these reasons, colleges and universities encourage faculty and staff to obtain external or extramural funding through grants, cooperative agreements and contracts.

Who is Responsible for Coordinating the Activity?

The Office of Sponsored Programs (OSP) has the primary administrative responsibility to provide needed services and support in the University’s efforts to obtain external funding. The OSP assists the faculty in locating funding sources, developing grant capabilities, preparing proposals and adhering to the institutional and funders’ guidelines.
How Does it Work?

A winning sponsored project is a multi-step process. This handbook is intended not only to facilitate this process, but also to serve as a guide to both new and experienced investigators in developing applications for external funding, and in meeting the responsibilities expected from Principal Investigators (PIs) or Project Directors (PDs) when funded. It is a living document, which will be modified as University policies and funders guidelines change.

In order for this process to work, the faculty PIs/PDs must assume certain responsibilities.

A Process Approach to Sponsored Programs

Steps in Obtaining Extramural Funding

1. Develop idea
2. Select funding agency
3. Submit Notice of Intent to Submit form to the OSP
4. Write proposal
5. Submit proposal through OSP
6. Follow-through with funding agency

IF FUNDED

1. Conduct Project
2. Submit project progress/financial reports as required
3. Close out project as required, or
4. Write & Submit Renewal Proposal

IF DECLINED

1. Request Review Comments
2. Revise & Resubmit
Responsibilities of PI/PD

<table>
<thead>
<tr>
<th>Be Responsible</th>
<th>for the direction of the project, ethical conduct of the research, scholarship and/or the education and training of students.</th>
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</thead>
<tbody>
<tr>
<td>Be Knowledgeable</td>
<td>about the regulatory requirements of the sponsor.</td>
</tr>
<tr>
<td>Conduct</td>
<td>the work supported by the grant or contract in a timely and professional manner.</td>
</tr>
<tr>
<td>Ensure</td>
<td>that all costs are allocable, allowable, reasonable and necessary. (Allowability, Allocability, and Reasonableness Guide); (see also <a href="http://www.omb.gov">www.omb.gov</a> for circular CFR Part 220)</td>
</tr>
<tr>
<td></td>
<td>that all cost sharing and/or matching fund commitments set forth in the award are met and documented.</td>
</tr>
<tr>
<td></td>
<td>that any subcontractors comply with the terms and conditions of each subcontract/sub-agreement and with the reporting requirements passed down to them.</td>
</tr>
<tr>
<td></td>
<td>that all closeout requirements are met including final technical report, reports on invention, property, and financial status report (FSR). Although the Business and Finance Division is responsible for the preparation and submission of the FSR, the PI/PD must review the report for accuracy.</td>
</tr>
<tr>
<td>Keep and Maintain</td>
<td>securely on campus all research or programmatic records conducted or produced in the course of the grant or contract for the period required by the audit retention clause of the award.</td>
</tr>
</tbody>
</table>

* OMB Circular 21 – Cost Principles for Educational Institutions

Alabama A&M University requires that all applications for a sponsored project initiated by a faculty or employee of the University must be submitted by the institution through the Office of Sponsored Programs. The Office of Sponsored Programs is the administrative unit charged with the responsibility of coordinating these functions.

The reputation of the University and its faculty, as well as the institution’s success in winning extramural funding is dependent on the interplay of several factors. Not the least of these factors are the quality of proposals submitted, the integrity and professionalism of Principal Investigators and the fiscal responsibility of both the investigator and the institution in the management of sponsored projects. Its staff is available to answer questions, help find solutions to unusual problems, and ensure Principal Investigators’ compliance with federal guidelines, funding agencies’ terms and conditions, as well as with university policies and procedures.
II. OFFICE OF SPONSORED (OSP) PROGRAMS AT AAMU

The Office of Sponsored Programs serves as the centralized unit for the coordination of the University’s externally sponsored research activities and projects. It is responsible for developing, sponsoring and coordinating all research and research-related activities at the University. It is responsible for the collective management of all activities associated with the receipt of external funding. The Office of Sponsored Programs processes, monitors, and facilitates the evaluation of all sponsored projects to ensure that all grants and contracts are consistent with institutional goal, policies and procedures.

Organizational Structure

The organizational structure is designed to make the office more viable, visible, focused, better managed, and supportive of faculty.

The OSP staff consists of; The Interim Executive Director, an administrative assistant, four pre-award grants administrators, one post award administrator, and one communications specialist. The organizational chart on the next page indicates the position role of staff member.

Functions of the Office of Sponsored Programs include the following:

- Maintaining up-to-date funding information and related materials from a variety of funding agencies, including public, private and corporate sponsors
- Maintaining a computerized system to aid in the search for the identification of potential sponsors
- Disseminating pertinent agency information to the research community
- Offering grantsmanship and proposal-writing workshops and seminars
- Providing assistance to faculty and staff in clarifying and interpreting federal/agency guidelines, requirements, regulations, as well as University policies and procedures
- Assisting Principal Investigators with proposal preparation, editing and evaluation, to ensure compliance with agency guidelines
- Processing proposals for internal reviews, departmental/university approval and transmittal
- Undertaking post-submission inquiries and tracking
- Providing Principal Investigators with post-award briefs
- Maintaining official University award files (electronic and/or hardcopy)
- Ensuring compliance with reporting requirements established by funding agencies
- Coordinating compliance issues relating to human subjects, animal care and use, radioactive materials and biohazards

- Coordinating development of memorandums of understanding (MOUs) with potential sponsors
- Evaluating client-initiated subcontracts to ensure the University interests are protected
- Developing and monitoring University-initiated contracts, subcontracts and sub-agreements
- Serving as official University point-of-contact between the agency and the institution
- Reviewing, implementing, and monitoring the University’s research administration policies and procedures, as well as contributing to the formulation of new policies as necessary

**AAMU OSP/OSP Staff Listing**
*(see staff responsibilities in appendix)*

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ms. Marian Geter</td>
<td>Interim Executive Director</td>
<td>Phone: Ext. 5684 Email: <a href="mailto:marian.geter@aamu.edu">marian.geter@aamu.edu</a></td>
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</tr>
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</tr>
<tr>
<td>Ms. Cecelia A. Wade</td>
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</tr>
<tr>
<td>Mrs. Marion Draper</td>
<td>Administrative Secretary</td>
<td>Phone: Ext. 8185 Email: <a href="mailto:marion.draper@aamu.edu">marion.draper@aamu.edu</a></td>
</tr>
</tbody>
</table>
III. PRE-AWARD ISSUES

Proposal Preparation Resources

The Internet contains a wealth of information regarding grant proposal resources and preparation guides. Additionally, many funding organizations and federal funding agencies have detailed proposal preparation guides and sample proposals available.

Funding Information Sources:

- [www.grants.net](http://www.grants.net)
- [www.gpoaccess.gov](http://www.gpoaccess.gov)
- [www.grants.gov](http://www.grants.gov)
- [www.foundationcenter.org](http://www.foundationcenter.org)

Federal Funding Sources:

- National Institutes of Health (NIH) - [www.nih.gov](http://www.nih.gov)
- National Endowment of the Humanities (NEH) - [www.neh.gov](http://www.neh.gov)
- National Aeronautics and Space Administration (NASA) - [www.nasa.gov](http://www.nasa.gov)
- National Oceanic and Atmospheric Administration (NOAA) - [www.noaa.gov](http://www.noaa.gov)
- National institute of Standards and Technology (NIST) - [www.nist.gov](http://www.nist.gov)
- U.S. Department of Health and Human Services - [www.hhs.gov](http://www.hhs.gov)
- U. S. Department of Defense - [www.defenselink.mil](http://www.defenselink.mil)

Other Funding Sources:

- Howard Hughes Medical Institute - [www.hhmi.org](http://www.hhmi.org).
**Preparing the Proposal**

Following identification of a funding source or potential sponsor, the next important task is to prepare a proposal for submission to the funding agency. The proposal is the primary vehicle by which the prospective PI/PD communicates an idea and plan to a sponsor. It informs the funding agency why, how, when and by whom the proposed activities will be done.

The solicitation document will prescribe the format and content of the proposal. Solicitation documents include the Request for Proposal (RFP), Request for Quote (RFQ), Broad Agency Announcements, Program Announcement (PA), Funding Opportunity Announcement (FOA) and others.

**Proposal Development**

(Obtained from “Guide for Proposal Development” prepared by the Ohio State University Office of Sponsored Programs)

A good proposal, whether it is research, training, or curricular development, requires time. Oftentimes one is forced to speed up proposal development because of impending deadlines, but many times one knows far enough in advance to make adequate plans. Many granting agencies have more than one deadline; it may be more profitable to miss a deadline rather than submitting an application that is not very well prepared. Writing a concept paper is one way of helping one plan, organize, think through, and refine ideas into fundable proposals.

**1. Concept Paper**

Proposal writing is a difficult exercise. It requires organization of thought, clear communication, and a logical sequence of ideas. Under the pressure of meeting a deadline it is especially difficult to produce a coherent, precise, and concise application which represents one's work in the most favorable manner possible. An especially useful aid in helping researchers develop their ideas and prepare for proposal deadlines is the concept paper. The concept paper is a brief sketch of a project idea, which serves as an advance organizer for the full proposal, and provides a medium to assess the idea in a number of contexts. This brief paper of 2-4 pages helps applicants organize, think through, and refine their idea so that it can be shaped into a fundable proposal. Once written, concept papers can be used in a variety of ways: 1) obtain feedback from colleagues; 2) identify resources needed; 3) bring collaborators on board; 4) determine boilerplate which will be needed; 5) identify potential sponsors; and 6) pre-proposal contact with sponsor.

By reducing proposal writing to an intermediate, smaller, more manageable task, a concept paper can prepare applicants to develop full proposals with more assurance, self-confidence, logic, and timeliness. Conceiving the proposal in miniature, researchers can better control its evolution. They can take advantage of critical debate, sponsor perspectives, and design expertise. As they map out the foundation for their project, they can anticipate problems, weakness, needs, and evaluate the relationship between the problem statement and solution. Before committing themselves completely to a project idea, they can in effect test out its feasibility and significance.
While deadlines often govern the proposal writing process, they are generally cyclical. Therefore, researchers can work toward a deadline instead of being driven by it, if they are prepared with a concept paper. Since writing and research productivity are derived from personal commitments, the concept paper is a means of establishing priorities and building upon background, training, and experience. They are aids in thoughtfully arriving at the type of commitment, which advances researchers' interests and contributes to knowledge.

Some ideas are not fundable, either because they are truly not important, because the timing is not yet right, or because there is no support available. The concept paper can help forecast the viability of an idea and suggest strategies for redefining it, remodeling it, aggressively pursuing it, or abandoning it. Since the effort invested in writing a concept paper is less demanding, it is a practical exercise, which can serve as an early success indicator. Research funds are highly competitive. The quality of applications is critical to their acceptance for award. By generating the proposal on a smaller scale and systematically iterating it, you can considerably enhance its chances for success.

2. Proposal Components

There is no standard format for proposals. Each application should be developed in accordance with specific program instructions. The text should be organized and keyed to the evaluation criteria published in the guidelines. Although the narrative outline should follow program specific guidelines, there are components which are common to all proposals and the following should be recognized as the basic framework for translating an idea to a well ordered form:

As previously mentioned, the solicitation document prescribes the format and content of the proposal. Proposal elements should be written with the solicitation’s Evaluation Criteria in mind – in other words, the elements should answer the questions that the reviewers will ask to ascertain the strengths and responsiveness of the proposal to the requirements.

COVER PAGE

Contains information about the legal applicant and the proposal: the principal investigator, the title of the project, the agency to which the application is being submitted, the date submitted, duration of the project, contact persons for questions or negotiation; institutional approvals; and amount requested.
Most proposals are submitted with a general cover sheet that includes the following:

- Federal Domestic Assistance Catalog (CFDA) number (or other identifying number of the program)
- Title of the proposed research
- Solicitation name and number
- Name and address of the sponsor
- Name and address of Alabama A&M University
- Name and Title of the Principal Investigator and Co-PI’s

In addition, the university requires the AAMU Proposal Certification Form for institutional approval.

The title deserves special attention. It carries the image of the project. Since it is entered, scanned, and indexed in information systems, it should be precise and telling. Keep it short, but appropriately descriptive.

**ABSTRACT**

A page which summarizes the key features of the proposal. It should include a statement of the objective, methods, and significance condensed to a page or less. The main points of the text should be covered; it should be informative to others and understandable to a lay person.

The reviewers usually read the abstract first to gain a perspective on the study; use it later to remind themselves of the nature of the study when the project comes up for discussion; it may be the basis for assignment by the sponsor to a specific review group.

**PROBLEM STATEMENT/NEEDS ASSESSMENT**

Define the problem in specific and realistic terms. Don't let them be too grandiose or too trivial. Why has this problem been chosen for study? What are the causes of the problem? Why does the study need to be conducted? Provide documentation and relevant, though carefully selected, statistics. State why the sponsor favors this project over all other applications.

**LITERATURE REVIEW/BIBLIOGRAPHY**

The problem statement and need for the study, as well as the methodology, will have their foundation in the literature.

For example, what is known about the area of inquiry; how does the study relate to
what is known; why has the particular approach to the problem been selected? Citations should be analytical, highlighting the essence of an author's work and describing strengths, weakness, comparisons, and points of departure. It is important to demonstrate your familiarity with the field. Any pertinent reference that is overlooked may be one that the reviewer expected to see cited. The bibliographic selection will reflect the author's scholarship and credibility.

If there is no literature bearing on the problem, indicate what sources were consulted; also offer reasons why there is a vacuum. Cite those works, which come closest to the problem and explain why they fall short. If the literature is overwhelming, select only those sources, which bear directly on the problem.

This part of the proposal is not usually a discrete section. Usually it is worked into the flow of the entire narrative so that it provides a conceptual framework. Two points should be kept in mind. First, the proposal can't be written and then the literature search done. Second, the reviewers will probably be some of the leading authorities in the field and will be looking for particular references; demonstrating your knowledge and understanding of the state-of-the-art is critical. Do not overlook the National Information Technical Service and similar sources. All citations in the text should be compiled in a Selected Bibliography.

**OBJECTIVES/QUESTIONS/HYPOTHESES**

These are precise, measurable statements of the expected outcome of the project. They can be phrased as objectives, or questions to be answered or hypotheses to be tested. They present the terms of the study by establishing its parameters.

Carefully selected, they create the specific focus for a manageable project; expressed in epic statements they propose a project, which attempts to do more than it could hope to realize.

If they are too narrow, the study may appear to be trivial. Striking a balance keeps the project realistic and manageable. Number and list them so that anyone reading the proposal knows exactly what you seek to achieve. Ask yourself if the objectives lend themselves to operational definitions and if the hypotheses and questions are testable. If they do not, redefine them until they do.

**PRELIMINARY WORK**

Often, especially in the case of highly competitive grants and contracts, there will be a request for information related to introductory and prerequisite research or studies performed prior to the
proposed project. It is useful therefore and to the researcher’s advantage to include a proposal section summarizing experimentation or studies that have been completed in preparation for the primary investigation being proposed. Funding organizations want some assurance that their research dollars are being put to the best possible use, and also want to learn what has led the investigator to formulate his or her present set of objectives. In many such cases, it may be next to impossible for the researcher to qualify for funding without the inclusion of some well-organized preliminary work.

**METHODOLOGY/DESIGN**

This section gives evidence of your ability to plan and conduct the study. What activities are proposed to carry out the objectives, to test the questions and hypotheses? What is the rationale for the approach?

The procedures should be carefully detailed. In a research proposal, discussion of the methodology should include what data will be collected, accessibility of data, who will collect it and how, how the data will be analyzed, sampling procedure, controls, and subjects. Justify where necessary the appropriateness of the study design and research methods. Address sample size and selection and application of statistical methodologies.

If you are going to develop curriculum, explain existing sources to be used and why selected, what form it will take, content, field testing, how it will be used, who will use it, and how it will be made available to users.

A training program should explain what material will be used, who the participants will be, how many, how they will be selected, where the training will take place, how long, and who the trainers will be. Let the reader know you have developed a complete plan of action.

**EVALUATION**

Carefully consider if an explicit evaluation plan should be included in your proposal and decide what factors will have to be assessed. Consult an evaluation specialist if you have no training or background in evaluation methodology. Clarify for the reviewer who will conduct evaluation, their qualifications to do so, and their plan for doing it. This may be a service provided by an outside consultant, someone on campus, or an organization set up for such purposes.

**RESULTS/SIGNIFICANCE**

Be sure you have clearly in mind what contribution the study will make. Can the process or the outcomes be duplicated, adapted, or generalized? What accomplishment can the agency take to Congress to support budget requests? Either as an advancement of fundamental knowledge or as
an instrument of applied science, the impact of the study must be made clear. Will the results have local, regional, or national significance? What difference will your project make (the eternal before and after question)?

**DISSEMINATION**

The results of any study must be made available to potential users for application or replication. How will you do it? Dissemination vehicles include presentation at a professional meeting, publication of an article, holding a conference, and utilizing any existing networks. Plans for this effort should be discussed when it is clear that an agency considers this activity a criterion of evaluation.

**MANAGEMENT PLAN**

Identify key staff members, including yourself, highlight their backgrounds, comment on the special contribution their expertise will enable them to make. Describe their specific responsibilities and show their relationships in an organizational chart. If other departments, institutions, or organizations will be participating in the project, discuss their input and what the lines of communication will be.

If consultants or an advisory board will be used, identify people or at least describe the backgrounds and capabilities, which you will seek. Explain the role, exactly what they do and when as well as why they are needed. Try to contact individuals before the proposal goes in to get their agreement to participate.

Let the reader know you understand your own limitations and weak areas as well as your strengths. Provide an activity chart, which lists tasks across the project time period. This can range from a simple bar chart to a critical path chart. The ordering of events, dates for completion, and staff responsibilities for implementation in a diagram help the reader visualize and summarize the work plan.

**OTHER ELEMENTS**

General university facilities or special features should be narrated. Equipment, systems, administration, resources - all should be highlighted as appropriate. While much of it can be boilerplate for any proposal you write, it should be adapted for each application to call attention to those support systems, which have special relevance to the proposed project. Curricula vitae for all key staff members and consultants are integral to the application.

Letters of support and endorsement help (and may be necessary) to demonstrate evidence of cooperation from participating organizations or individuals. Access to subjects, sites, and data collections must be made clear. Collaborations with partnering institutions or consultants should be specific, and the letter should clearly state what the collaborating party is contributing to the project.

The PI Checklist for Principal Investigator Checklist for Developing and Refining the Proposal (page 20) can also be found on the OSP Forms website (see appendix for link).
Developing a Budget or Cost Proposal

The budget is just as important as the technical proposal. It is a comprehensive planning document that integrates all of the details for attaining the objectives of the proposal. The budgetary process should take into account preparation for the long-range goals, as well as the short-term objectives.

The project budget is the instrument through which the cost of the project’s activities plans, priorities, and organization are expressed. The funding agency grants a certain amount of money to the project on the basis of the line-by-line budget estimate that is submitted as part of the grant proposal.

Direct Costs

Practically all grant proposals are funded on the basis of a line-by-line budget, which typically includes both direct cost, and facilities and administrative cost (indirect cost). Direct costs are defined as the costs of the project that will be paid directly to personnel or a vendor and is clearly assignable to a project activity.

Most federal funding agencies expect that the project director will adhere to the budget, and may require prior approval before certain changes are made. A number of foundations also require prior approval for budget modifications subsequent to an award. Such approvals must be requested and approved in writing. This process will be cited in the award Terms & Conditions.

Budget Elements

Included in the budget should be provisions for the following cost categories as specified by OMB Circular A-21, Cost Principles for Educational Institutions, www.omb.gov:

1. Salaries and wages to cover personnel, honorariums and clerical assistance. Salaries requested must be consistent with the regular practices of Alabama A&M University. In addition to making provisions for the above categories, it is imperative that the budget includes funds to cover fringe benefits for full-time AAMU employees. Please see AAMU Salary Schedule located on the AAMU Human Resources Forms page (see appendix for link).
2. Fringe Benefits, including employee benefits such as Social Security, Alabama Retirement, Group Life Insurance, Unemployment Compensation and Worker’s Compensation, are included in AAMU fringe benefit rate. The current fringe benefit rate can be found at: http://my.aamu.edu/portal/page/portal/Office_of_Research_Sponsored_Programs/Grant_Contracts/Forms/Fringe-Benefit-Analysis_FY2009.pdf.

This rate is adjusted annually and should be verified prior to use in each budget. Projects with anticipated start dates in the next fiscal year should reflect the projected fringe benefit rate which is estimated in the spring of the preceding year. For example, projected new fringe benefit rates will be available in Spring 2009 for projects that will start in October 2009.

3. Communications include postage, mailing service and telecommunications charges.
4. Travel includes in-state and out-of-state trips for fieldwork, attendance at conferences and
seminars needed by the investigator to enhance his/her ability to perform the work of the proposal, or to present the results of the project.

4a. Domestic travel includes travel in the United States and travel to Puerto Rico. All other travel is considered foreign travel. Government sponsors generally require persons traveling under a grant or contact to travel by U.S. flagged carriers, if available.

4b. The current reimbursable rates for AAMU are set forth by the State of Alabama and include the rates for use of personal automobile and meals. Please visit the following link for current rates:

www.aamu.edu/portal/Business_and_Finance_Division/Office_of_the_Comptroller

5. Contractual Services include Consultants and other non-University services not otherwise directly charged in the grant. For construction related contractual services, all parties must comply with The Davis-Bacon Act (40 USC 276a et seq.). (http://www.thecre.com/fedlaw/legal12a/276a.htm) This act establishes minimum wages to be paid to laborers and mechanics on construction projects to which the U.S. is a party involving public buildings or public works within the U.S.

5a. Anticipated Consultant services should be justified. Daily compensation rate, number of days of expected service and per diem allowances should be included in the travel, consultant or “other” category of the budget as appropriate.

6. Supplies and Materials include items such as printing, instructional materials, office supplies, audiovisual equipment, and computers under $5,000 (or agency standard). The budget should indicate in general terms the type of expendable materials and supplies that are required to meet the goals of the project.

7. Equipment includes allowable items such as scientific equipment and apparatus unavailable to the Principal Investigator for the purpose of conducting the work required on the project. Generally, equipment refers to an item of property that has the acquisition cost of $5,000 (or agency standard) or more and an expected service life of more than one year. A brief description and justification to show the purpose, function and cost of the equipment is necessary. Include vendor quotes for equipment where feasible.

8. Grants, scholarships and awards are provided for support of graduate or undergraduate research assistants to help carry out the proposed research. Tuition remission is not taxable. Stipends are taxable and should be filed as a source of income for the tax year in which the funds were received.

9. Indirect Cost (IDC), or Facilities and Administrative (F&A) Cost appears as a single separate item in the budget. This item is not University profit; rather, it represents the total costs to the University in support of the project which cannot be directly attributed to a project activity. This includes a portion of the University’s overall administrative cost, such as purchasing and procurement, personnel, payroll, building and equipment, maintenance, office space, utilities, maintenance of the library and research administration. The IDC or F&A rates at Alabama A&M University are approved by the U.S. Department of Health and Human Services, Division of Cost Allocation. See full rate agreement in the Appendix and on the OSP website in the Information section.

10. Cost Sharing, also known as cost matching, is the portion of the project costs that are not borne by the sponsor, but by the requestor and any other non-federal agency. Cost sharing
can be either a mandatory requirement by the agency, or a voluntary commitment made by the University and other non-federal sources. The OMB Circulars A-21 and A-110 have very specific regulations regarding the documentation of all cost sharing. In accordance with OMB Circular A-110, cost sharing must be verifiable and auditable within the University’s accounting system; must not be included as contributions for any other federally-funded project or program; must be necessary and reasonable to accomplish project or program objectives; must be allowable in accordance with the applicable cost principles (OMB Circular A-21), the terms and conditions of the funding agency, and the AAMU policies; must be funded from non-federal sources, unless authorized by federal statute; and must be incurred during the term of the agreement. Non-documentation of cost sharing may result in disallowed costs of the funding agency. All matching contributions must be approved by the Dean of the College and the Office of Sponsored Programs prior to submission of the proposal.

10a. In-kind contribution is the value of items such as donated time of faculty and staff, use of equipment, facilities, and supplies that a grantee contributes as its share of project costs. The value of these services must be approved by the Principal Investigator’s or project director’s Department Head and Dean of the School because the funding of these expenses therefore comes from that departmental budget, not the funding agency. Explanations for the source(s) of funds to cover this item should be clearly identified with an explanation provided in the proposal when forwarded for review and signature to OSP. Principal Investigators should contact OSP staff for assistance with in-kind contribution or cost-sharing issues. All in-kind time and services must be documented. PI’S SHOULD NOT VOLUNTEER IN-KIND CONTRIBUTIONS OR CASH MATCHING UNLESS EXPLICITLY REQUIRED BY THE FUNDING AGENCY.

10b. Cash Match is the commitment of cash resources to the project or program. Proposals that are not supported by documentation identifying all sources of cash match commitments will not be submitted from the University to any funding agencies. Formal requests for cash match must be made by March 31 of each year for the following fiscal year to the OSP. Until the OSP responds with an official approval, the PI has not received authorization to include the cash match commitment in the proposal for submission to the funding agency. Cash match commitments can also be authorized by departments and school budgets. Specific account numbers authorized by the dean must be provided prior to submitting the proposal. The OMB Circulars A-21 and A-110 apply for regulation and documentation of third party contributions.

10c. Third Party contributions are those contributions that are made by non-federal organizations outside of the university system. They can be in-kind or cash. Third party contributions may be in the form of cash, real property, equipment, supplies, and other expendable property, and the value of goods and services directly benefiting and specifically identifiable to the project or program. The OMB Circulars A-21 and A110 apply for regulation and documentation of third party contributions.
<table>
<thead>
<tr>
<th>Principal Investigator Checklist for Developing and Refining the Proposal</th>
<th>Complete</th>
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<tr>
<td>1. Do you have a title that reflects the nature of the proposed research or project?</td>
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<td>2. Have you submitted a Notice of Intent to Submit form (AAMU-OSP-002) to OSP?</td>
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<td>3. Have you adequately cited your sources?</td>
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<td>4. Have you clearly stated the problem and made a good case for its solution?</td>
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<td>5. Are the project objectives clear, succinct, measurable and achievable?</td>
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<td>6. Do you have an appropriate and logical plan for achieving the project objectives?</td>
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<td>7. Do you have a tentative timetable for your project?</td>
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<td>8. Have you identified the responsible personnel?</td>
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<td>9. Have you developed and reviewed your project costs (budget) using current AAMU rates?</td>
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<td>10. Are your budget, budget justification (narrative) and project narrative aligned?</td>
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<td>11. Is your abstract/survey appropriate and consistent with the final version of your technical proposal?</td>
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<td>12. Do you have a biographical sketch for each professional person listed under Key Personnel and Consultants?</td>
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<td>13. Do you have a letter of collaboration for each external collaborator and consultant?</td>
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<td>14. Are all assurances and certifications duly completed and properly signed?</td>
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<td>15. Have you (re)checked the spelling and the grammar?</td>
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<td>16. Have you provided all data needed for the agency cover sheet (DUNS#, EIN, TIN, etc.)?</td>
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<td>17. Have you completed the requirements that will enable the electronic submission processes?</td>
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<td>18. Have you provided AAMU’s completed Proposal Review and Certification Form (AAMU-OSP-001) with the required signatures?</td>
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IV. AAMU Policies and Procedures for Proposal Processing (see flowchart as an Appendix)

*AAMU Internal Review, Approval, & Signatures*

All proposals submitted to funding agencies by faculty or other employees of the University must go through internal review and approval prior to submission.

The AAMU Proposal Review and Certification Form (AAMU-OSP-001) signed by the PI, department chair and dean, must be presented to the OSP before the proposal will be submitted. The form is located on the OSP website in the Forms section (see link in appendix).

*Primary Responsibilities*

AAMU’s review process is designed to strengthen the quality of the proposal, its responsiveness to the requirements of the funding agency, and to protect the interest of the University. The following are the primary responsibilities of the principals in the review process:

1. The Principal Investigator is responsible for:
   . • Proposal Development
   . • Technical Merit
   . • Budget Appropriateness

2. The Chairperson/Department Head/Dean reviews the proposal to:
   . • Assure academic soundness
   . • Assure consistency with goals and the advancement of the department
   . • Assure availability of resources if awarded
   . • Reconcile faculty release time with other responsibilities

3. The OSP reviews to:
   . • Ensure compliance with University’s fiscal policies
   . • Ensure correctness of direct cost, salaries, and fringe benefits computations
   . • Verify cost sharing and in-kind contributions
   . • Assure the University is appropriately reimbursed for services
   . • Verify budget totals
   . • Coordinate the internal review process
   . • Ensure compliance with sponsored guidelines and policies
   . • Ascertain compliance with institutional policies and mission objectives
   . • Verify proper authorization of institutional commitments regarding matching, cost sharing or in-kind contributions
   . • Ensure approval by appropriate institutional review board(s) when necessary.
All proposals for internal review must be accompanied by agency guidelines or instructions and the AAMU Proposal Review and Certification Form (internal proposal coversheet) (AAMU-OSP-001). Principal Investigators should submit their proposals to OSP for processing and final approval only after the proposals have been reviewed, and the form endorsed by the chairperson/department head/dean. Thereafter, OSP will obtain all other necessary endorsements and final approvals before the proposals are transmitted to the funding agency. The review process may take several days to complete; therefore, **Principal Investigators should plan to submit their proposals to OSP at least ten (10) days prior to the funding agency’s deadline**, to ensure that the deadline can be met.

PIs should provide one hard copy (paper) of the final proposal for review. After the proposal and budget have been reviewed PIs are responsible for incorporating the changes into their proposals.

Electronic packages for submission through Grants.Gov, FastLane or other electronic systems should be completed by the PI prior to release to OSP. PIs can receive assistance and training from OSP to complete the forms and work within the electronic package upon request.

**Special Note Concerning Electronic Submissions:** If the proposal is to be submitted electronically the internal processing and administrative approval(s) must be completed before submission, evidenced by the signed form AAMU-OSP-001.

**Withdrawal of Proposals**

If a proposal is to be withdrawn for any reason after it has been submitted to the funding agency, OSP should be contacted prior to submission of the withdrawal request to the agency.

**Assurances and Certificates**

The Vice President for Academic Affairs is the official authorized to sign supporting assurances and certifications required by sponsoring agencies. However, certifications regarding fiscal matters are signed by the Vice President for Business and Finance.

The OSP staff will provide Principal Investigators whatever assistance is necessary to complete all required assurances and certifications for proposals.

**Human Subjects in Research (IRB)**

Alabama A&M University adheres to a rigorous policy for the protection of human research subjects in accordance with the United States Department of Health and Human Services regulations, 45 CFR 46. All research projects involving human subjects that are conducted under the auspices of the University, regardless of the funding source, must be reviewed and approved by the Institutional Review Board (IRB). The Office of Sponsored Programs is the administrative unit responsible for coordinating the functions of the IRB. AAMU’s Human Subjects Research Policy is included in the Appendix and located on the OSP web page in the Information section.
Proposals involving human subjects should be submitted to the OSP for assignment to the appropriate IRB, including the IRB Application for Approval of a Research Project Involving Human Subjects forms (AAMU-IRB-001 for researchers, and AAMU-IRB-002 for student researchers), the proposed research protocols and informed consent forms. The forms are located on the OSP Forms webpage and in the Appendix. A model consent form necessary for documenting informed consent of human subjects can be found in the Office of Sponsored Programs. Principal Investigators should allow at least 30 days for completion of IRB review. Following IRB review, the Principal Investigator will be advised of the outcome in writing, whether approval, disapproval, or suggestions for modifying the proposed protocol. Under no circumstances will a research project involving human subjects be allowed to proceed without prior IRB review and approval.

Use of Vertebrate Animals in Research (IACUC)

Federal regulations require that the university assure the humane care and use of animals as research subjects in accordance with the Animal Welfare Act (P.L. 99-158), located on the web at: [http://grants.nih.gov/grants/olaw/references/hrea1985.htm](http://grants.nih.gov/grants/olaw/references/hrea1985.htm). The Public Health Service (PHS) Policy further requires that institutions must have on file in the Office for Protection from Research Risks (OPRR) of the National Institutes of Health (NIH) an approved Animal Welfare Assurance document before they can receive PHS research funds.

Accordingly, the policy for Alabama A&M University is to take appropriate measures for the proper care and humane treatment of animals used in research, testing, and education conducted under the jurisdiction of the Institution.

To ensure compliance with this policy, the University has established the Institutional Animal Care and Use Committee (IACUC), which has the responsibility for monitoring and approving all research protocols conducted under the auspices of the Institution that involve vertebrate animals.

Prospective investigators whose research may require the use of vertebrate animals should submit their proposals including the protocols to IACUC at least 30 days prior to sponsor deadlines to allow enough time for the Committee to review the proposal protocols. Questions regarding the use of animals in research may be directed to the IACUC Chairperson at Ext. 4175.

ENVIRONMENTAL HEALTH AND SAFETY

Radiation Safety

A researcher proposing to use radioisotopes must meet the following requirements:

- Ensure that the University is licensed to use the proposed isotope(s).
- Have adequate training in the safe use of radioactive materials
- Strictly adhere to all requirements for ordering, handling, storing, and disposing
of the radioactive material. The University Radiation Safety Officer is housed in the Office of Environmental Health and Safety. All researchers contemplating the use of radioactive materials should first contact the safety officer for specific guidelines and licensing procedures. Members of the University Radiation Safety Committee are appointed by the president of the university.

**Hazardous Materials and Biosafety**
The University has a designated Environmental Health and Safety Officer to ensure general safety including the handling of hazardous materials in accordance with federal regulations. Detailed information and answers to safety related questions can be obtained from the Office of Environmental Health and Safety (Extension 4091.).

Principal Investigators are expected to exercise all appropriate precautions when working with potentially hazardous materials.

Administrations and/or engineering controls must be determined prior to use of such materials. When necessary, the university safety office may assign a trained industrial hygienist or other technically qualified person to provide assistance. All incidents and potentially unsafe conditions must be reported immediately to the Environmental Health and Safety Officer.

AAMU’s Hazardous Waste Manual is located on the OSP website in the Information section. The link to this webpage is located in the Appendix.

**Recombinant DNA**

In conducting research that involves the use of Recombinant DNA or other hazardous biological agents, Principal Investigators must assume the following responsibilities in accordance with NIH guidelines:
1. Determining real and potential bio-hazards
2. Determining the appropriate level of biological and physical containment
3. Selecting the laboratory techniques and microbiological practices
4. Devising safe procedures to minimize the risk of human and/or environmental contamination
5. Determining the applicability of various precautionary medical practices
6. Obtaining approval of proposed research protocol
7. Applying for approval from the appropriate NIH committee on Recombinant DNA
8. Ensuring that staff is appropriately trained in both safety practices and in procedures for dealing with accidents;
9. Supervising the safety performance of the staff.

The investigator must promptly report all accidents, extended illness of a worker, or any other incidents that may pose danger to humans or the environment to the Environmental Health and Safety Officer, who will in turn alert the and other relevant institutional authorities, including the Institutional Bio Safety Committee (IBC) and the OSP. OSP will make any required reports to the NIH.
AAMU’s Biosafety Manual is located on the OSP website in the Information section. The link to this webpage is located in the Appendix.

V. POST-AWARD ADMINISTRATION

Setting up a Sponsored Award

Award Acceptance

Notification of a sponsored program award to the University may be an award letter, a purchase order, a detailed contract, or an agreement spelling out the terms and conditions of the award.

Generally, the notification of award goes to the Office of Sponsored Programs. If award notices (or letters of decline) are sent directly from the funding agency to the Principal Investigator or other University officials, originals should be forwarded to OSP.

Upon receipt of an award, the Office of Sponsored Programs will accept the award by signing the appropriate acceptance documents, then request that OSP execute and transmit the appropriate acceptance documents to the sponsor on behalf of the University.

Awards for proposals that did not undergo the normal internal processing, review, and approval through OSP may be refused by the University. In all cases, the University is not obligated to accept an award.

Banner Fund Number

After an award has been formally accepted by the University, the relevant documents are sent to Office Grants and Contracts Accounting for assignment of an account number for the award and sets up the account in the University’s financial reporting system. OSP is notified once the account number is assigned. Research activities are governed by OMB Circular A-110, A-21 and A-133 (www.omb.gov.)

The responsible OSP staff for the project:

• Briefs the Principal Investigators on the award terms and reporting requirements
• Monitors the account through the terms of the award
• Monitor sub-recipients for compliance with the terms and conditions of the relevant programmatic requirements/deliverables
• Approves all requisitions for expenditures under the account
• Prepares periodic account status reports
• Works with the Principal Investigator to obtain proper authorization for rebudgeting or transfer of funds across budget line items
• Principal Investigators should be aware that they are responsible for meeting the technical requirements of the award, and for managing their budgets. Therefore, they should always ensure
that
• Allocations are available for object code expenditures
• Expenditures have been properly approved
• Expenditures are consistent with proposed budget
• Expenditures are consistent with the funding agency’s guidelines and University policies.

In some cases, budgets may be adjusted by the grantee institutions without prior approval. However, since the amounts vary by sponsor, please see OSP prior to planning expenditures based on budget line item adjustments. In all cases, formal University approval must be rendered by OSP in conjunction with the funding agency.

**Cost Allocation Methodologies**

**Overview**

This policy is designed to provide assistance to the University when direct charging costs to sponsored projects and to comply with the direct charging principles contained in 2 CFR Part 220 (OMB Circular A-21). As such, the University is responsible for ensuring that costs charged to a sponsored agreement are allowable, allocable, and reasonable under these cost principles; and the University’s financial management system shall ensure that no one person has complete control over all aspects of a financial transaction.

In addition, goods and services purchased by the University under a sponsored award may often benefit more than one award. Such costs must be allocated to sponsored awards in proportion to the actual benefit received by the awards. If it is impractical to determine how much of the goods or services are actually used for each award, an allocation methodology must be developed that reasonably estimates the actual benefit to each award. Costs are then distributed to each benefiting sponsored award using the allocation methodology.

**Sub-Recipients**

Alabama A&M University (AAMU) is responsible for the programmatic and financial monitoring of its sponsored research award sub-recipients. A sub-recipient is a third-party organization performing a portion of AAMU research projects or other sponsored programs. The terms of AAMU-sub-recipient relations are documented in, and governed by, sub-grant/subcontract/consortium agreements.

These Guidelines & Procedures for Monitoring Sub-recipients (Guidelines) are provided to assist responsible AAMU Faculty and Staff in ensuring that sub-recipients conduct their portion(s) of research projects in compliance with applicable laws and regulations as well as with the terms and conditions of awards and sub-awards. The Guidelines are also to help ensure that project costs incurred by sub-recipients are reasonable and allowable.
Roles & Responsibilities

1. Principal Investigators. Principal Investigators (PIs), assisted by the OSP staff are primarily responsible for monitoring sub-recipients to ensure their compliance both with federal regulations and with the primary and sub-recipient award terms and conditions.

2. Department administrators. Department administrators (chairs, deans) are responsible for assisting PIs in the implementation of their projects at the departmental and school level. This included monitoring sub-recipient activities, including review of invoices, requests for reimbursement, and reviewing reports. Department administrators will report, as directed by the funding agency, the results of their monitoring activities for each of their sub-recipients.

3. AAMU’s Office of Sponsored Programs/Grants and Contracts Accounting. The AAMU Office of Sponsored Programs (OSP) together with Grants and Contracts Accounting (GCA) are responsible for ensuring that AAMU’s sub-recipient monitoring procedures are compliant with federal and other applicable regulations and are consistent with sound business practices. OSP and GCA will provide further training, monitoring and guidance in interpreting applicable regulations and sub-recipient award terms and conditions, and in interpreting and executing these Guidelines.

Sub-Recipient Setup

When applicable, the OSP will prepare and issue subcontracts to sub-recipients when identified in the prime award. As such, continuous monitoring of the sub-recipients, as directed by OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations (www.omb.gov) must be performed. All sub-recipients will be cross referenced in the Excluded Parties List System (EPLS) at www.epls.gov. Certification will be made on the document (i.e. requisitions, contracts, etc.) with verification that the EPLS has been reviewed. Should the organization be listed, the university will contact the organization or individual and inform them of the cancellation of all agreements and/or activities until such time that the organization is no longer listed on the EPLS. If the sub-recipient organization is not listed in the EPLS system, AAMU will issue a subcontract to the organization based upon the allowance in the prime award. The sub-recipient must supply a Statement of Work, and a Budget request for consideration of award. Upon approval of the sub-recipients’ information, the sub-agreement will be issued. As a part of the required sub-recipient monitoring, all Sub-Recipients will be requested to submit a copy of their latest A-133 Audit Report as required by the OMB Circular A-110. Upon receipt of requests for payment of any sub-recipient invoices, the PI will verify all charges, after which, the PI will requisition the invoice for payment. In the event that the A-133 has not been received, the sub-recipient may be subject to delayed payment of invoices. Additionally, delays in payment of sub-recipient invoices may occur if the sub-recipient has not submitted the required technical, and/or financial reports, as specified in the sub-contractual document’s reporting requirements.
Federal Regulations

Although applicable federal regulations that describe sub-recipient monitoring are general, they permit the following core monitoring mechanisms: Advising sub-recipients of all applicable federal laws and regulations and all appropriate flow-down provisions from the primary agreement:

1. The routine receipt and review of technical performance reports
2. The routine review of expenses-to-budget
3. The periodic performance of on-site visits or regular contact, if necessary
4. The option to perform “audits,” if necessary
5. The review of Office of Management and Budget (OMB) Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations, (A-133 Audits) filed by sub-recipients and any audit findings
6. The review of corrective actions cited by sub-recipients in response to their audit findings
7. Sanctioning sub-recipients in cases of their continued inability or unwillingness to permit monitoring activities, to have required audits and/or to correct noncompliant conduct

The above list is not exhaustive of all compliance requirements and monitoring mechanisms. In addition to these general federal options, there may be additional sponsor- or program-specific requirements that mandate the collection and documentation of other assurances (e.g., with respect to lab animals, human subjects, or biohazards) during the course of a project.

Sub-recipient Monitoring Guidelines

On an annual basis, OSP and GCA will review all active subcontracts for which monitoring is mandated and inquire further into those that are deemed to require closer scrutiny in light of considerations such as:

1. **Size of sub-recipient award.** Large awards (e.g., awards with annual budgets in excess of $500,000) would receive substantial and frequent review and monitoring; mid-size awards (e.g., awards with annual budgets between $100,000 and $500,000) would receive proportionately less substantial and less frequent monitoring; and smaller awards (e.g., awards with annual budgets less than $100,000) would receive general review with the least frequent oversight.
2. **Relative award size; research portfolio.** The larger the award size relative to the sub-recipient’s sponsored research portfolio, the greater the need for sub-recipient monitoring.
3. **Relative award size passed through.** The larger the percentage of the program award passed through to the sub-recipient, the greater the need for sub-recipient monitoring.
4. **Award complexity.** The more complex the award, the more sensitive the work and/or the more extensive the governing regulations, the greater the need for sub-recipient monitoring.
5. **Prior experience.** New sub-recipients, inexperienced sub-recipients and/or sub-recipients with a history of non-compliance, new personnel and/or new or substantially changed systems will require increased monitoring.
6. **Location.** Sub-recipients who are geographically remote from AAMU may require more monitoring and oversight.
7. **Foreign: for-profit status.** Foreign sub-recipients and for-profit sub-recipients are
associated with increased risks and so may require a greater degree of review, evaluation and attention.

8. **Degree of external oversight by auditors or sponsoring agencies.** The greater level of external oversight there is by auditors and/or sponsoring agencies, the less the need there will be for monitoring by AAMU. Note, however, that AAMU is obligated to monitor sub-recipients of its federal awards regardless of the fact that the sub-recipients are subject to A-133 Audits.

9. **Systems sophistication.** The less sophisticated the sub-recipient’s systems and administrative operations, the greater the need for sub-recipient monitoring by AAMU.

Upon identification of those sub-recipients that require closer scrutiny based on the above review criteria, the OSP and GCA will take appropriate monitoring actions to ensure compliance with sub-agreement performance requirements, financial terms and conditions, and all applicable federal rules and regulations. The OSP will coordinate communications with other AAMU departments or offices to avoid any duplication of effort.

In addition to routine monitoring procedures, the OSP and GCA will work with PIs and department administrators to establish channels of communication with sub-recipients that require further scrutiny. Administrators at such sub-recipient sites may be asked to complete questionnaires (to be filed at AAMU) documenting their internal controls and grants management procedures. In addition, sub-recipients that are not subject to A-133 Audits may be asked to submit supporting documentation in the form of original receipts, copies of payroll records, and/or audits if and as circumstances warrant.

**Department Level Sub-recipient Monitoring Procedures**

The frequency and scope of departmental monitoring procedures should be determined jointly by the responsible PI and department administrators. A “risk-based” approach to sub-recipient monitoring is recommended with the frequency and intensity of monitoring driven by the criteria stated in the above Guidelines. Under this approach, monitoring will focus on those sub-recipients at the greatest risk of or potential for non-compliance.

Department administrators, with guidance or assistance from the OSP and GCA staff, should annually consider the following sub-recipient monitoring procedures when appropriate:

1. **Review of technical performance reports.** Technical performance reports should be reviewed on a timely basis by the PI. Any unusual or unforeseen items should be investigated and documentation thereof should be retained in the department’s files for ready access by regulators. In some cases, sub-award terms may require specified deliverables in addition to, or in lieu of, technical reports.

2. **Review of invoices and expenses-to-budget.** Invoices and expenses-to-budget should be reviewed for cost-reimbursement sub-agreements. The sub-recipient’s invoices showing both current period and cumulative expenses-to-budget are generally required. Department administrators should compare sub-recipient invoices to established sub-award budgets. Evidence of the regular review of invoices by both the PI and the department administrator should be in place and retained on file.

   “Evidence” can be in the form of, among other things, PI initials or authorizing signature
on invoices, e-mail communications, or notes of meetings with the department administrator.

3. **Clarification of invoiced charges.** Department administrators should request clarification of charges invoiced by the sub-recipient that are unusual, miscellaneous, apparently excessive or which otherwise stand out. If explanations provided are insufficient to render a prudent judgment on the allow ability of the cost, and the terms of the subcontract so permit, department administrators may request detailed justifications from sub-recipients. Department administrators may also periodically request, if the terms of the subcontract permit and particularly from high-risk sub-recipients, detailed support for selected invoiced charges to verify their appropriateness and reasonableness.

Examples of detailed justifications that may be requested from sub-recipients include, without limitation:

- Payroll records/data
- Copies of paid invoices showing the cost of items purchased and Vendor Justification Forms if required by federal contract
- Descriptions of services rendered by consultants including hourly rates and time reports
- Details of incurred travel charges stating the purpose, airfare, meals, ground transportation, and unallowable costs
- Costs determined to be unallowable or unreasonable should be disallowed
- In circumstances where questionable costs remain unresolved, particularly when subcontract terms do not permit requesting supporting documentation, it may become necessary to conduct a definitive audit of all or a portion of questionable costs. (see Audits below) In these cases, department administrators may contact GCA for coordination of subsequent actions.

4. **On-site visits.** On-site visits are discretionary monitoring procedures. On-site visits are conducted by the PI to evaluate both compliance with the scientific objective of the project and the appropriateness of the sub-recipient’s administrative systems, processes, and charges. Such visits should be documented via correspondence, meeting notes, and/or trip reports and retained on file.

5. **Audits.** Discretionary audits of sub-recipients are an acceptable monitoring procedure under federal regulations, and all of the University’s cost-reimbursement sub-recipient agreements contain “right-to-audit” clauses. Formal audits are performed infrequently, however, and departments should contact AAMU’s OSP or GCA before initiating discretionary audits. Reporting results of monitoring procedures. Department administrators will report to OSP and GCA on an annual basis the results of their monitoring activities for each of their sub-recipients.

**AAMU Central Administration Sub-recipient Monitoring Procedures**

1. Review A-133 Audits on-line. The GCA staff should review A-133 Audits filed by sub-recipients which expend $500,000 or more of federal funds during the fiscal year and are subject to A-133 Audits. GCA may view the sub-recipient’s A-133 Audits in the Federal Audit Clearinghouse (FAC) database (http://harvester.census.gov/sac). This website provides evidence to verify that the sub-recipient has completed A-133 Audits and to assess the presence of audit findings. This FAC verification may be done in lieu of reviewing A-133 Audits submitted by the sub-recipient to AAMU. In cases of a sub-recipient’s continued inability or unwillingness to have the required audits, OSP and GCA may consider taking appropriate sanctions. Examples of
sanctions may include withholding of final payment, withholding of further obligations of time and funding to the sub-recipient

2. When sub-recipients have A-133 Audit findings. OSP and GCA may consider issuing a management decision on audit findings, when appropriate, and evaluating sub-recipient corrective actions in response to audit findings. Corrective actions cited by the sub-recipient should be verified to ensure sub-recipient compliance and may necessitate on-site monitoring. The OSP and GCA may also consider whether sub-recipient audit findings necessitate adjustment of their own records.

3. Sub-recipients not subject to A-133 Audits, including foreign and for-profit entities. Because A-133 Audits do not apply to foreign or for-profit sub-recipients, AAMU may establish its own requirements, as necessary, to ensure compliance by such sub-recipients. OSP and GCA should consider using sub-recipient monitoring techniques similar to those used for entities subject to A-133 Audits. Contracts with foreign or for-profit sub-recipients should describe applicable compliance requirements and responsibilities. All foreign or for-profit sub-recipients not subject to A-133 audits will be required to complete a questionnaire in order for AAMU to assess capability of compliance with federal regulations. These may also include pre-award audits, periodic or regular on-site visits or invoice and expenses-to-budget review.

**Sub-recipient Contract Language Advice**

All subcontracts under federal government primary contracts and grants should contain language, substantially as set forth below, requiring subcontractors to report promptly to AAMU any problem related to AAMU subcontractors identified in their annual A-133 Audits and to submit corrective action plans.

**Audit.** Subcontractor agrees to comply with the requirements of OMB Circular A-133. Subcontractor further agrees to provide AAMU, in a timely manner, with access to any of the independent auditors’ reports that present instances of noncompliance with federal laws and regulations that bear directly on the performance or administration of this Subcontract. In cases of such noncompliance, Subcontractor will provide copies of responses to auditors’ reports and a plan for corrective action(s).

All reports prepared in accordance with the requirements of OMB Circular A-133 shall be available for inspection by representatives of AAMU or the government during normal business hours. The Subcontractor agrees that it shall keep for a period of three (3) years following completion of the project, or until all litigation, claims or audit findings have been resolved and final action is taken, such records as may be reasonably necessary to facilitate an effective audit.

The Subcontractor shall cooperate with AAMU in resolving questions that AAMU may have concerning the auditors’ report and plans for corrective action(s).

In most cases, funding agencies require both progress reports and final reports. Final reports are normally due within 90 days after the end of the project period, and usually include the technical, property (major equipment) and invention reports. The Property and Invention reports specific to each funding agency must be filled for completeness even when the project acquired no
equipment nor produced an invention. Principal Investigators should take this requirement seriously and ensure that all reports are submitted to the funding agency on or before the due date. Failure to do so may adversely affect the investigator’s (and by extension the University’s) future prospects for funding from the agency. The schedule for required technical reports is often incorporated in the award document from the funding agency.

**Personnel**

Although all personnel hiring at the University is processed by the University’s Office of Human Resources, all requisitions for hiring under sponsored project accounts must have prior OSP approval before submission to the Human Resources for processing. Principal Investigators should contact the Human Resources office to get answers to questions on university hiring policies and procedures, and to obtain the appropriate forms as soon as possible following the notification of award. One should initiate the processing of requisitions well before the proposed starting date for new personnel.

A Principal Investigator shall not engage new personnel to work on a project before a legally binding personnel contract becomes effective. Payment for such services rendered prior to the effective date of the approved contract may be disallowed and may become the personal liability of a Principal Investigator or designee who ignores this provision. All requisitions for purchasing major equipment and materials for sponsored projects should be submitted to the appropriate channels established by the University (Department Chair, Dean, etc.).

**Purchasing**

Principal Investigators seeking approval for procurements and expenses under sponsored projects should ensure that such procurements and expenses are allowable under the award. Incurring pre-award costs becomes the risk of the University if funding is reduced or not approved by the sponsor. The University, therefore, does not readily approve such cost risks.

After appropriate approval the request is submitted to OSP, which forwards such requisitions to the University’s procurement office for final processing and execution. All sub-recipients, consultants, and research activity supporting vendors will be cross referenced in the Excluded Parties List System (EPLS) at [www.epls.gov](http://www.epls.gov). Certification will be made on the document (i.e. requisitions, contracts, etc.) with verification that the EPLS has been reviewed. Should the organization be listed, the university will contact the organization or individual and inform them of the cancellation of all agreements and/or activities until such time that the organization is no longer listed on the EPLS. While OSP staff will offer whatever assistance is necessary to expedite the acquisition process, Principal Investigators should find the following suggestions helpful:

- Refer to the AAMU Purchasing Department, Policies and Procedures for guidance on requisitions/purchasing.
- Attach a written bona fide sole source justification if only one vendor can supply an item or service to meet the exact specifications of the project task(s).
• Provide as much background information as possible and any special instructions that may be important on the requisition form.
• Forward, concurrently with your purchase requisition, copies for any pertinent supporting or explanatory documents.
• Set a meaningful and realistic “delivery date” on the requisition. Use a specific date rather than “ASAP,” “NOW,” “RUSH,” etc.

All equipment purchased with extramural funds must be properly tagged and inventoried by Property. Principal Investigators should contact Inventory Control at Ext. 5547 for the appropriate procedures. Property Management Manual link.

Since title to all equipment purchased under a sponsored project is vested in the State, under Federal Regulations, the Principal Investigator cannot dispose of, or transfer equipment without proper approval.

Cost Transfers

Cost Transfer Definition

A cost transfer is the reassignment of an expense to a sponsored project after the expense was initially charged to another sponsored project or a University project. Cost transfers include reassignments of salary, wages, and other direct costs.

Policy

1. **The appropriate account should be charged initially.** The University expects that all costs charged to a sponsored project are correctly charged at the outset, such that charges must be:
   a. Allowable – the cost is allowed by federal regulations, sponsor terms and conditions, including program specific requirements and University policy;
   b. Reasonable – reflects whether or not the individuals concerned acted with due prudence in the circumstances;
   c. Allocable – the cost has a direct benefit to the account being charged; and
   d. Treated consistently – like costs in similar instances are treated consistently throughout the University.

   Goods and services should be charged or allocated among awards at the time of the original purchase whenever possible and practical, to avoid unnecessary cost transfers. The PI is expected to make personnel and corresponding payroll distribution determinations (utilizing the EPAF system) prior to any individual devoting effort to a project.

2. **Financial information in the University’s accounting system should be reviewed regularly to facilitate timely discovery of error.** A departmental business manager or other designated staff member may assist the PI in reviewing financial information. The
PI must identify legitimate errors in a timely manner and communicate required changes to Grants & Contracts Accounting promptly.

3. **Authorization and documentation of cost transfers.** All cost transfers involving sponsored project funds, whether for labor or goods and services, require preparation and approval ensuring that no one person has complete control over all aspects of a financial transaction.

The department is responsible for ensuring that requested cost transfers are made promptly and that a copy of all required documentation is forwarded to Grants & Contracts Accounting. Documentation related to each cost transfer should be scanned and emailed to Grants & Contracts Accounting.

Care must be exercised in making any cost transfer; therefore when a cost transfer is necessary the following information is required:

- Authorization in writing that is signed and dated (email is acceptable) from the PI or a designee;
- A detailed statement explaining the reason for the cost transfer and, if applicable, how the error occurred;
- A description of how the cost benefits the award to which the cost is being transferred; and
- Documentation that provides evidence of the existence of the charge on the award from which the cost is being removed (i.e., Banner printout) dating and verifying the original charge.

4. **Cost Transfer Approval.** Grants & Contracts Accounting has the authority to approve and post cost transfers to the University’s financial system. Any cost transfer not meeting the requirements of this policy will be rejected.

**Property Management**

In compliance with OMB Circular A-110, the tracking of all federally purchased equipment will be monitored using the AAMU inventory control system. The Property Management Department is the central location for the receipt and the delivery of all purchased activity made with external funds. This department along with the OSP is responsible for complying with all state and federal regulations regarding the monitoring and tracking, disposal of all government purchased equipment.

The procedures governing these processes are contained in the Property Management Manual.
Travel Requests
In-State

Investigators whose projects involve in-state travel should follow the steps for reimbursement of travel expenses:

1. Complete the University Travel Request Form (see Appendix). This form may be obtained from the AAMU OSP Forms web page. Include justifying documentation such as event announcement and event registration.
2. Obtain the required signatures (department head, supervisor, dean, or vice president as applicable).
3. OSP verifies funds availability. Final approval is granted from Academic Affairs.

Out-of-State Travel

The University has established procedures for approval of out-of-state travel that applies to all employees. Faculty should contact the Office of Sponsored Programs at ext. 5678, if they have questions concerning travel.

For travel under Sponsored Project Accounts, the following steps apply in the approval process:

1. Complete the University Travel Request Form (see Appendix). This form may be obtained from the respective departments from the AAMU OSP Forms web page. Include justifying documentation such as event announcement and event registration.
2. Submit form with the appropriate signatures to OSP.
3. The OSP office will verify funds availability and appropriateness and approves.

To avoid delays, investigators should plan to submit their Travel Request Forms to OSP as soon as the travel opportunity is identified.

Completing Financial Reports – Interim and Final

Ensuring the submission of financial reports whether it is in the form of an invoice, federal financial status report/financial final report or other sponsor specified financial report is the responsibility of Grants & Contracts Accounting. This responsibility however, relies on the collaboration and cooperation of the PI, PI’s business office, and/or the Office of Sponsored Programs, as appropriate.

Financial Reporting - GCA

It is the responsibility of GCA to prepare interim financial reports, final financial reports and invoices based on institutional financial records. Additionally, it is the responsibility of GCA to sign and submit all financial reports to the sponsor on behalf of the institution. On rare occasions and with the approval of GCA, financial reports may be submitted to the sponsor by the...
department or business support unit in collaboration with GCA in order to ensure the receivable is properly recorded and payment is tracked and collected. Post award GCA duties include:

- Coordinates financial audits of sponsored projects by federal or external auditors.
- Facilitates the settlement of uncollectible issues.
- Maintains the central post award financial records according to records retention policy.
- Prepares, approves, and certifies, as appropriate the interim, final financial report or invoice and submits to sponsor.

Travel Reimbursement

1. Include Travel Requests and supporting documentation as described above with requisition and travel receipts to OSP.

Change of Principal Investigator (PI)

Circumstances may occasionally arise which necessitate the selection of a new Principal Investigator for an active sponsored project. The new appointment can only be made with the concurrence of the department head, and ultimately, the funding agency. The request for a change should provide an explanation of why the change is necessary and also include the vita of the proposed new Principal Investigator, and should be channeled through the OSP.

Request for No-Cost Extension

Should a Principal Investigator determine that more time will be needed to complete a work on a sponsored project beyond the expiration date of the award; a no-cost extension may be requested from the funding agency. The Principal Investigator should notify OSP in writing about the need for a no-cost extension at least forty-five (45) days prior to the expiration date of the award. OSP will work with the Principal Investigator to obtain the funding agency’s approval.

Transfer of Award from a Previous Institution

A new faculty member may wish to transfer an award from a previous institution to the University. Such a transfer must have the approval of both the funding agency and the previous institution. If approval is granted, the Principal Investigator should prepare a new or revised proposal for internal processing following standard OSP procedures.

Occasionally, a Principal Investigator may accept an appointment in another institution before the expiration of an award received while employed by the University. The transfer of an award to another institution is usually determined by the funding agency’s policies.

If the University elects to retain the project, a new Principal Investigator will be appointed to take over the project, following the process described in the preceding section.
Should the University elect not to retain the project, the departing Principal Investigator must send a request to transfer the unspent portion of the award to the new institution. Such a transfer must be approved by the VP for OSP, the dean of the school or college, and ultimately by the sponsoring agency. Approved transfers occur only after final accounting and certification by the responsible grant accountant that all incurred obligations have been settled, and a balance remains for transfer to the new institution.

**Closing Out a Sponsored Program**

Project closeout involves much more than simply the expiration of an award. For a sponsored project to be properly closed-out, the Principal Investigator must ensure that the following agency-specific requirements are met:

- All technical and financial reports required by the funding agency have been submitted in time.
- Any special requirements for the transfer or disposal of property purchased through the award have been met.
- Patent or copyright procedures have been followed for personnel hired only for the duration of the award.
- Proper termination procedures have been followed for personnel hired only for the duration of the award.

**VI. General Policies of AAMU**

OSP is developing an automated award management information system to remind Principal Investigators of Project closeout dates. It is the responsibility of the Principal Investigator to notify the responsible grant accountant of any outstanding financial charges so that the funding agency can be properly billed before the final Financial Status Report is submitted.

In light of the institutional responsibilities and obligations inherent in the conduct and management of sponsored programs, and the desirability of having the same Principal Investigator throughout the term of an award for purposes of accountability, it is the policy of Alabama A&M University that a Principal Investigator must be tenured, on tenure track, senior staff, or an administrative officer of the University.

**Faculty Compensation**

Faculty compensation for work performed on sponsored projects will be based on the faculty member’s base salary during the academic year. A faculty member on an academic year salary may receive additional compensation for work on sponsored projects during the summer months. However, the monthly summer rate may not exceed 33.3% of the preceding academic year base salary. [www.omb.gov](http://www.omb.gov).
Hiring Consultants

Consultants are hired under sponsored projects to provide specific and specialized services that the project staff cannot provide. Principal Investigators should ensure that funds are allocated in the initial project budget for consultant services, before engaging a consultant. OSP will offer assistance in the development and processing of consultant agreements. All consultant agreements must follow the University’s standard form.

The Principal Investigator can get a fair idea of the going consultant rate by (1) comparing the fees paid for similar individuals in other projects; (2) comparing the range of fees quoted by individuals under consideration who have similar credentials; (3) comparing the limits paid by federal agencies.

Intellectual Property

A patent is a property right granted by the federal government giving the owner the right to control the manufacture, use, or sale of an invention for a limited period of time. Patentable discoveries that result from research or educational activities performed at the University, will be covered by the University’s patent policy.

This policy covers all faculty, administrators, staff, students, or other individuals who receive financial support from the University, or who use the University materials or facilities in the process of conceiving an idea, discovery, or invention. The disposition of rights to inventions are governed by the Bayh-Dole Act (Chapter 18 of Title 35 of the USC).

In the case of sponsored programs, the agreement with the funding agency regulating patents, inventions, discoveries, licensing, etc. will govern. For all federal agencies with which there is no such agreement, the University agrees to provide an irrevocable nonexclusive free license to the government for the use of patents arising from programs that they sponsored. Faculty and other researchers having questions regarding disclosures and patent rights should contact OSP.

Copyrights

A copyright is the right of ownership to an intellectual property including electronically produced work. Sponsored projects occasionally result in ideas that may yield patents or copyrights. Alabama A&M University desires to encourage its faculty and other research staff to generate new ideas that could be copyrighted. Faculty who may have questions relating to copyright issues that result from sponsored projects should contact the Office of Sponsored Programs.

Publications

Faculty and other University researchers are urged to broadly disseminate the results of their research and accomplishments. This is consistent with the University’s goal to foster the growth
and dissemination for knowledge. Most funding agencies merely require that their support be acknowledged in publications resulting from projects they sponsored; however, others may require that they also be sent reprints of such review and comment before final submission for publication.

Faculty should review agency regulations on publications before submitting information from sponsored projects for publication. OSP may be contacted if there are any questions.

Alabama A&M University expects all investigators to adhere to the highest standards of intellectual honesty, integrity and ethics in formulating, conducting, interpreting and publishing research. It is only in adherence to such standards that researchers fulfill their obligations to the academic community at large. All seekers of knowledge need assurance that the body of data reported in research results can be relied upon for advancement in the various disciplines.

**Misconduct**

The University has established formal policies and procedures for dealing with research misconduct in consonance with NIH and NSF guidelines. Under these policies, misconduct in research encompasses but not limited to: fabrication, falsification, keeping poor research records, demanding underserved authorship on papers by junior associates, sexual harassment and violations of IRB rules governing human subjects or animal use.

Excluded from this definition are honest errors, or honest difference in the interpretations or judgments of data.

The process of handling misconduct matters normally consists of three (3) principal phases: Inquiry, Investigation, and Disposition of Findings.

All cases of alleged or suspected misconduct should be reported in confidence within 60 days to the OSP and the Vice President of Academic Affairs, who has the responsibility for initiating appropriate action(s). In cases judged to have merit, every effort will be made to conclude administrative proceedings within 120 days of such reports.

**Export Control Policy**

It is the policy of the Alabama A&M University that, absent extraordinary circumstances, teaching, research, and service will be accomplished openly and without prohibitions or restrictions on the publication and dissemination of the results of academic and research activities. Certain federal regulations, however, may require the University to obtain permission from the Department of State or the Department of Commerce before allowing foreign nationals to participate in research involving specific technologies or before sharing research information with persons who are not citizens of the United States or permanent resident aliens.
These export control regulations have the potential to limit the research opportunities of University researchers and their students, affect publication rights, and prevent international collaboration in certain research areas. In addition, violations of these export control regulations can result in the loss of research contracts, monetary fines, or incarceration in the penitentiary. The regulations do not apply, however, to information that is in the public domain or to information that is the result of fundamental research activities.

Therefore, it is the policy of the Alabama A&M University to pursue its mission in teaching, research, and service in a manner that is consistent with the applicable export control regulations while making reasonable efforts to maximize the situations in which the University may claim the benefit of the public domain or fundamental research exemptions to the regulations. To implement this policy, the Office of Sponsored Programs (OSP), the Office of Counsel (OOC), and the Principal Investigators (PI) of University research contracts and grants must conduct a thorough review of research projects and contract and grant provisions to determine the applicability of export control regulations and the exemptions thereto. This review will proceed as follows:

1. The Contract Administrator assigned to a particular research contract or grant will review the terms of the contracts or grant for provisions that restrict access to or publication of research and technical data, that limit the participation of foreign nationals in the research effort, or otherwise render the exemptions from the export control regulations inapplicable. The results of such review will be indicated on a checklist designed to facilitate such review that will be signed and dated by the Contract Administrator. The OOC will provide such assistance as may be needed for the Contract Administrator to complete the review and will make an independent determination, as part of its general contract review procedure, that the checklist has been completed correctly.

2. If the results of such review indicate that an exemption from the export control regulations is not available, the Contract Administrator will ask the PI for the contract or grant to determine if the research falls into one of the categories of technology designated by the Department of State or the Department of Commerce as export controlled. The OSP will provide a form designed to facilitate this review to the PI. The PI will complete this review, sign and date the form, and return it the OSP. The University will assist the PI in this review and in assessing the applicability of the export control regulations; however, primary compliance responsibility rests with the PI of the contract or grant. Before changing the scope of research or before adding new staff to the project the PI must re-evaluate this determination.

3. If the review of the PI indicates that the research falls into one of the categories designated as export controlled, the OSP will notify the appropriate dean and department chair or research center director of such determination. These parties will then collaborate, along with the PI, to implement a response to this determination that satisfies the requirements of the export control regulations. Such response may include a decision to forego the research opportunity in view of the possible burdens or restrictions associated with compliance with the regulations.

4. No work under a contract or grant, or proposed contract or grant, can begin until this process has been completed.
VII. Definitions

Allowable Cost
A cost is allocable to a sponsored agreement if (1) it is incurred solely to advance the work under the sponsored agreement; (2) it benefits both the sponsored agreement and other work for the institution, in proportions that can be approximated through use of reasonable methods, or (3) it is necessary to the overall operation of the institution and is deemed to be assignable in part to sponsored projects.

Contracts
A contract is used when the primary purpose of the transaction is acquisition of property or services for the direct benefit or use of the Federal Government involvement.

Grants
A grant is used when the principle purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute. Substantial involvement between the sponsor and the recipient is not expected when carrying out the activity. The exact course of the work and its outcome cannot be defined precisely.

Cooperative Agreements
A cooperative agreement is used when the principle purpose of the transaction is to accomplish a public purpose of support or stimulation authorized by Federal Statute, and substantial involvement between the sponsor and recipient is anticipated during the performance of the work. The nature of the involvement can be defined and specified in advance.

Costs
Costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity; or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

A cost may be considered reasonable if the nature of the goods or services and the amount of cost involved reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made. Major considerations involved in the determination of the reasonableness of a cost are: (a) whether or not the cost is of a type generally recognized as necessary for the operation of the institution or the performance of the sponsored agreement; (b) the restraints or requirements imposed by such factors as arm’s-length bargaining, Federal and State laws and regulations, and sponsored agreement terms and conditions; (c) whether or not the individuals concerned acted with due prudence in the circumstances, considering their responsibilities to the institution, its employees, its students, the Federal Government, and the public at large; and, (d) the extent to which the actions taken with respect to the incurrence of the costs are consistent with established institutional policies and
practices applicable to the work of the institution generally, including sponsored agreements.

**Indirect Costs**
Indirect costs, means costs that are incurred for common or joint objectives and therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. The proportion of such costs which benefit the research activities of the institution can be included in the calculation to determine the indirect rate for federal grants.
APPENDIX

Links to Online Forms and Information

AAMU Office of Sponsored Programs Forms
AAMU OSP Forms are found at the following link: 
http://my.aamu.edu/portal/page/portal/Office_of_Research_Sponsored_Programs/Grant_Contracts/Forms

AAMU Office of Sponsored Programs Information Center
The AAMU OSP Information Center is found at the following link:
http://my.aamu.edu/portal/page/portal/Office_of_Research_Sponsored_Programs/Grant_Contracts/Information_Center

AAMU Office of Sponsored Programs Federal Regulations
Key Federal Regulations are found at the following link:
http://my.aamu.edu/portal/page/portal/Office_of_Research_Sponsored_Programs/Grant_Contracts/Federal%20Regulations

AAMU Office of the Comptroller

AAMU Property Management

AAMU Human Resources Forms
AAMU HR Forms are found at the following link:
http://www.aamu.edu/portal/page/portal/Human_Resources/Forms_and_documents

AAMU Purchasing Forms
AAMU Purchasing Forms are found at the following link:
http://www.aamu.edu/portal/page/portal/Business_and_Finance_Division/Purchasing_Department/Online_Forms

AAMU Grants and Contracts Accounting Forms
Grants and Contracts Accounting Forms are found at the following link:
STAFF DUTIES AND RESPONSIBILITIES

The Interim Executive Director

The Interim Executive Director as the overseer OSP executes the below listed duties;
- Report to the Associate Provost, Dean of Graduate Studies;
- Plan and conduct training for staff and faculty;
- Supervise/manage the Office of Sponsored Programs;
- Work with the deans to promote increased proposal writing by faculty;
- Schedule and conduct proposal writing workshops/webinars for faculty;
- Establish partnerships with agencies, foundations, and organizations to increase the funding available for the university faculty;
- Manage cash match requests;
- Work with Grants and Contracts Office to ensure proper management of funds to include drawdowns, reporting, and close out requirements;
- Write proposals;
- Work with potential PIs as requested and/or as needed;
- Promote and manage university externally funded grants and contracts;
- Provide uniform administration of federal, state, and private regulations to all grants, contracts and cooperative agreements;

Administrative Assistant

The Administrative Assistant duties include:
- Provides assistance to the Executive Director for Sponsored Programs (meetings, plan and coordinate tasks essential for daily operations); generate letters, reports, charts, minutes, personnel documents;
- Processes payroll monthly
- Coordinates leave (annual/sick) for office staff;
- Serve on various campus committees;
- Purchase equipment, software, etc;
- Coordinates meetings and travel for the Executive Director, staff and visitors;
- Maintains files, office supplies, and process general office requisitions;
- Supervises student workers;
- Processes and pay monthly invoices, and student payroll;
- Manages mail log database (requisitions, budget forms, RPAF, incoming mail, etc.), for Sponsored Programs;
- Provides Notary services for faculty, staff and students;
- Provides other duties as assigned.
Grant Administrator-Pre/Post-Awards

- Works with the dean and faculty in the assigned college
- Research and Review Funding Opportunities;
- Analyze RFP’s and articulate to faculty;
- Develop and revise forms to facilitate submission of proposals for review by OSP;
- Create key word search lists based on faculty/staff research interests;
- Utilize federal, state, and private electronic portals to search for opportunities;
- Present opportunities to deans, chairs, faculty and staff for review and possible submission;
- Review proposal narratives, budgets as submitted by prospective researcher for accuracy per announcement;
- Prepare proposal packages for submission to funding agencies;
- Submit proposals to federal, state and private;
- Work with Post Award Administrator to prepare the award’s budget, review budget approvals;
- Submit requisitions to the Post Award Administrator
- Coordinate with Grants and Contracts Accounting on the establishment of the account Number;
- Review grants and contracts expenditures (requisitions, encumbrances, payroll items, consultants, etc.) to be sure that each is allocable, allowable, reasonable and necessary;
- Prepare and manage grant and contract subcontracts as well as prepare modifications for subcontracts;
- Review requests for changes in project scope, hiring of project staff, change in PI;
- Review requests for purchases, budget revisions, travel, requests for consultants, and students
- Prepare and submit all requests for No-Cost Extensions;
- Receive progress and final reports;
- Coordinate research compliance between funding agency and university;
- Employ working knowledge of federal circulars;
- Prepare reports as requested;
- Serve on university committees
- Receive Time and Effort reports;
- Prepare and submit reports as requested;
- Works with GCA to establish budget
- Coordinates with Grants & Contracts Accounting (GCA) and Business & Finance offices
- Works with GCA to monitor financial reimbursement process (from sponsor);
- Has quarterly reconciliation meetings with GCA to review drawdowns and schedule close out preparation;
- Works with Business & Finance office to ensure yearly A-133 audits are conducted
- Assist with close-out activities between the university and agency for each funded project;
- Provides other duties as assigned.
**Grants Administrator – Post Awards**

- Reviews grants and contracts expenditures received from PI (requisitions, encumbrances, payroll items, consultants, etc.) to be sure that each is allocable, allowable, reasonable and necessary;
- Monitor budgets for research foundations, federal, state, private and local project awards;
- Verifies budget conforms with sponsor requirements
- Coordinate close-out activities between the university and agency for each funded project;
- Assist with Project Closeout requirements
- Provides other duties as assigned.

**Technical Communications Specialist**

- Management database for the Office of Sponsored Programs (OSP) and the Office of Institutional Research, Planning and Evaluation (OIRPE);
- Create reports showing research activities;
- Manage webpage for unit and related offices;
- Post solicitations for Grants & Contracts on the Office of Sponsored Programs’ web page;
- Facilitate Online Research Newsletter for Office of Sponsored Programs;
- Prepare/format presentations;
- Serve as technical lead for conferences, webinars, seminars and workshops;
- Scan, copy, and file documents;
- Process requisitions, for software, equipment, etc.;
- Develop/investigate processes/mechanisms to assist/enhance daily workflow;
- Assist the Director of Institutional Effectiveness with SACS related documents and deliverables;
- Provide technical assistant for the Graduate Studies Office (Presentations, Electronic Thesis/Dissertation Submission Process, Assessment Conference and Web Page);
- Provide technical assistant to various offices across campus, including the Office of the President, when called upon;
- Prepare reports as requested;
- Review and revise departmental publications as requested;
- Serve on university committees.
OSP searches and reviews funding opportunities

OSP identifies and shares funding opportunities with potential research faculty

PI submits to OSP Notice of Intent to Submit Form

OSP analyzes RFP with potential PI

OSP consults with sponsor regarding RFP

PI prepares and submits proposal draft to OSP

OSP reviews proposal draft and PI makes revisions

OSP confirms requirements have been met

PI provides proposal for submission

OSP reviews signed internal documents

OSP submits proposal to sponsor

OSP enters proposal into database

Note: Proposals not awarded will be analyzed by OSP - sponsor will be contacted, reviewer comments will be requested and revised proposals will be resubmitted by PI/OSP in next funding cycle if applicable.
OSP/PI establishes periodic communications with sponsor throughout project period

OSP logs award into database

OSP works with PI to prepare Budget Approval Form

OSP executes the award

OSP reviews terms and conditions with PI

OSP verifies budget conforms with sponsor requirements

OSP coordinates with GCA and B&F Offices to establish budget

OSP identifies reporting due dates and shares with PI

OSP monitors and receives Time & Effort Reports from PI

OSP works with GCA to monitor financial reimbursement process

OSP reviews grants and contract expenditures received from PI

OSP receives Progress Reports from PI

OSP has quarterly reconciliation meetings with GCA

OSP prepares Close-out process

OSP works with Business & Finance office to ensure yearly A-133 audits are conducted

OSP ensures financial access to project is terminated

Note: Proposals not awarded will be analyzed by OSP - sponsor will be contacted, reviewer comments will be requested and revised proposals will be resubmitted by PI/OSP in next funding cycle if applicable.