

**Project Directors Guide and  
Policy & Procedures Manuals  
of the  
Office of Sponsored Programs  
and  
Grants and Contracts  
Accounting**

**Revision 1 - April 2017**

# Contents

1	OSP General Information .....	6
1.1	Mission Statement .....	6
1.2	Office Location .....	6
1.3	Organizational Structure .....	6
1.4	Functions of the Office of Sponsored Programs .....	6
1.5	Incentives Program .....	7
2	Proposal Development Procedures and Activities .....	8
2.1	Proposal Submission Procedure .....	8
2.1.1	Limited Submissions .....	9
3	Proposal Development Tutorial .....	10
3.1	Concept Paper .....	10
3.2	Proposal Components .....	11
3.3	Budget Development .....	15
3.3.1	Budget Categories .....	16
3.4	Other Budget Considerations .....	19
3.4.1	Allowability, Allocability, and Reasonableness Guide .....	19
3.4.2	Basic Steps in Budgeting a Proposal .....	21
3.4.3	Policy on Indirect Cost .....	21
3.4.4	Policy on Faculty Release Time .....	21
3.4.5	Employment and Compensation on Research and Sponsored Program Activities .....	21
3.4.6	Salary Supplements .....	22
3.4.7	Federal and State Grant Expenditures .....	22
3.4.8	Transfer of Principal Investigator to another Institution .....	22
3.4.9	Cost Sharing .....	22
4	Post-Award Procedures and Activities .....	23
4.1	Award Set-Up .....	23

4.2	Progress Reports .....	23
4.3	No Cost Extension .....	23
4.4	Purchasing and Accounting.....	23
5	Compliance .....	24
5.1	Policies and Procedures .....	25
5.1.1	Secret or Classified Research .....	25
5.1.2	Publications Policy .....	25
5.1.3	Intellectual Property .....	26
5.1.4	Human Subjects in Research.....	26
5.1.5	Animal Subjects in Research .....	27
5.1.6	Biohazards.....	28
5.1.7	Hazardous Waste .....	29
5.1.8	Hazardous Research Areas, Occupational Safety and Health.....	29
5.1.9	Copyright Policy .....	29
5.1.10	Patent Policy .....	30
5.1.11	Dealing with Possible Research Misconduct .....	30
5.1.12	Time and Effort Reporting: Certifying Effort on Sponsored Projects .....	31
5.1.13	Procedures for Time and Effort Reporting .....	36
5.1.14	Conflict of Interest .....	37
5.1.15	Anti-Lobbying.....	39
5.1.16	Civil Rights, Handicapped Individuals, Age and Sex Discrimination.....	39
5.1.17	Drug-Free Workplace .....	39
5.1.18	Debarment and Suspension.....	40
5.1.19	Non-Delinquency on Federal Debts .....	40
5.1.20	Health and Safety.....	40
5.1.21	Programmatic Compliance/Technical Reports.....	40
5.1.22	Consultant Payments .....	41
5.1.23	Overload Payments from Grants for University Personnel.....	41

5.1.24	Stipends .....	42
5.1.25	Impact of Release Time on Cost Sharing.....	42
5.1.26	Expenditure of Project Funds.....	42
5.1.27	Travel .....	43
5.1.28	Property Control .....	43
5.1.29	Financial Management.....	44
5.1.30	Final Reports .....	45
5.1.31	Project Close-out.....	45
5.2	Sub-Recipient Award Procedures and Guidelines .....	47
5.2.2	Sub-Recipient Setup.....	47
5.2.3	Federal Regulations .....	48
5.2.4	Sub-recipient Monitoring Guidelines.....	48
5.2.5	Department Level Sub-recipient Monitoring Procedures .....	49
5.2.6	AAMU Central Administration Sub-recipient Monitoring Procedures .....	51
5.2.7	Sub-recipient Contract Language Advice.....	51
6	GCA Cost Policies .....	53
6.1	Cost Allocation Guide.....	53
6.1.1	Cost Allocation Methodologies Overview.....	53
6.1.2	Developing an Interrelationship Allocation Methodology.....	54
6.2	Cost Transfer Policy.....	56
6.2.1	Scope.....	56
6.2.2	Purpose of the Policy.....	56
6.2.3	Policy Statement .....	56
6.3	Cost Transfer Procedure.....	58
6.3.1	Cost Transfer Procedure – General Information Scope.....	58
6.4	GCA FINANCIAL REPORTING POLICY .....	60
7	APPENDICES .....	62
7.1	Appendix A. Office of Sponsored Programs Overview .....	62

7.2 Appendix B. Pre-and Post-Award Forms..... 62

7.3 Appendix C. Research Compliance Manual ..... 62

7.4 Appendix D. Patent and Copyright ..... 62

7.5 Appendix E. Office of Grants and Contracts Accounting Overview..... 62

# **1 OSP General Information**

The Office of Sponsored Programs (OSP) serves as the major unit responsible for the development and promotion of the University's overall program of sponsored programs and sponsored research. OSP implements the established sponsored programs and research priorities, goals and policies as defined in the University's long-range strategic plan. OSP is responsible for assisting all facets of the University with the process of sponsored programs and research. It provides support for research and externally funded programs at the University. All proposals involving sponsored programs and research are reviewed and approved by OSP prior to final submission to the external funding agencies.

Related information concerning applications for research support from federal and state agencies, corporate organizations, foundations, and institutes are available through OSP. This office also oversees all patent and copyright activities through approved technology transfer agents. OSP has the ultimate responsibility for advising the President, faculty and administrative staff on institutional research policies, activities and making recommendations on current and future priorities in research.

## **1.1 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.

## **1.2 Office Location**

The Office of Sponsored Programs is located in the Carnegie Building, Buchanan Street, on the second floor.

## **1.3 Organizational Structure**

The Office of Sponsored Programs reports directly to the Associate Vice President for Research and Sponsored Programs. The office also works directly with the Office of Grants and Contracts Accounting (GCA) and indirectly with the Office of the President, Academic Affairs, Business and Finance and Student Affairs, on all matters relating to sponsored programs and sponsored research. The OSP Organizational Chart is displayed in Appendix A. The OSP organization chart titles reflect the functional positions that operate in OSP

## **1.4 Functions of the Office of Sponsored Programs**

Functions of the Office of Sponsored Programs include the following:

- a. Maintaining up-to-date funding information and related materials from a variety of

funding agencies, including public, private and corporate sponsors

- b. Maintaining a computerized system to aid in the search for the identification of potential sponsors
- c. Disseminating pertinent agency information to the research community
- d. Offering grantsmanship and proposal-writing workshops and seminars
- e. Providing assistance to faculty and staff in clarifying and interpreting federal/agency guidelines, requirements, regulations, as well as University policies and procedures
- f. Assisting Principal Investigators with proposal preparation, editing and evaluation, to ensure compliance with agency guidelines
- g. Processing proposals for internal reviews, departmental/university approval and transmittal
- h. Undertaking post-submission inquiries and tracking
- i. Providing Principal Investigators with post-award briefs
- j. Maintaining official University award files (electronic and/or hardcopy)
- k. Ensuring compliance with reporting requirements established by funding agencies
- l. Coordinating compliance issues relating to human subjects, animal care and use, radioactive materials and biohazards
- m. Coordinating development of memorandums of understanding (MOUs) with potential sponsors
- n. Evaluating client-initiated subcontracts to ensure the University interests are protected
- o. Developing and monitoring University-initiated contracts, subcontracts and sub-agreements
- p. Serving as official University point-of-contact between the agency and the institution
- q. Reviewing, implementing, and monitoring the University's research administration policies and procedures, as well as contributing to the formulation of new policies as necessary

## **1.5 Incentives Program**

The OSP has developed a comprehensive awards program to encourage faculty to participate in research. A percentage of the indirect charges earned from funded grants and contracts is distributed to the principal investigator, department of origin, college of

origin, and OSP. Research incentive awards are designed to promote and reward successful grantsmanship. They include:

- a. **Principle Investigator (PI) of the Month** – OSP recognizes each month the PI whose award brought in the largest amount of funds.
- b. **Project/Program Director of the Month**- OSP recognizes the Project Director who submitted a successful competitive proposal and received the largest amount of funding that month.
- c. **New PIs of the Month** – Faculty, who have written for the first time will be recognized each month.
- d. **Researcher of the Year** – The OSP is committed to recognizing researcher for outstanding efforts. A researcher will be recognized at the end of each academic year.
- e. **OSP End of the Year Recognition Affair** - OSP will honor all PIs at an end of the year affair. The College/School that received the most awards during the academic year will also be honored.

## **2 Proposal Development Procedures and Activities**

### **2.1 Proposal Submission Procedure**

All research grant proposals and contract applications must be internally reviewed and approved before leaving the University as an official submission. All proposal submissions must be coordinated with the Office of Sponsored Programs.

Procedures for submitting proposals to state and federal agencies as well as post-award activities are as follows:

- a. The Principal Investigator (PI) should submit a "Notice of Intent to Submit" form (see Appendix B) to OSP soon as he/she decides to develop a proposal or 30 days prior to the proposal due date. The form notifies both OSP and appropriate Chairs, Deans, and other supervisory or administrative individuals of proposed research, since these persons need to agree that the proposed activity is consistent with the missions of their respective units. Moreover, they may be called upon to provide space, release time, etc. for the project if funds are granted.
- b. If a proposal is to involve Human Subjects, Laboratory Animals, Recombinant DNA, Hazardous Materials and Radioisotopes, there are specific procedures to follow and approvals to be obtained. PIs should consult the AAMU Research Compliance Manual (see Appendix C) and the OSP grant administrator for additional information on these requirements. Attention must be given to these issues early in the proposal development because they may require committee approval prior to proposal submission.
- c. Preliminary proposal review(s) can be scheduled with Departmental Chairs or



Coordinators during the proposal development period. PIs should develop their proposals consistent with the specific RFP notification being answered.

- d. The final-draft proposal should be submitted through appropriate supervisory channels using the "Proposal Review and Certification Form" (Proposal Cover Page) (see Appendix B). Signature approvals are needed from the PI, Co-I's, Department Chair and Dean/Research Director. OSP will obtain the approval signatures for Associate Vice President and others as needed to complete the review process. Note: In signing the Proposal Cover Page, the PI is approving the entire proposal and assuming responsibility for: (1) the scope of scientific and technical effort; (2) preparation of the required technical reports; and (3) management of the project within the budget and time restraints of the proposal in compliance with sponsor regulations and University policies.
- e. In preparing the budget, use appropriate Fringe Benefits and Indirect Cost rates posted on the OSP website.
- f. The first draft of the proposal should be submitted to OSP **10 Working Days (minimum)** before the agency due date and the final proposal submitted to OSP **four Working Days** before the agency due date. **Allow Extra Time for Proposals Specifying Special Conditions** (e.g., use of Human Subjects, Laboratory Animals, Hazardous and/or Radioactive Materials, etc.). Proposals must be reviewed to assure that they conform to academic, financial, research conduct, personnel, animal welfare, hazardous materials/waste handling, and human subject health/safety restrictions and guidelines imposed on and by the University. Even under normal circumstances (with no special conditions), completing the review takes time and is often subject to the availability of responsible individuals (reviewers). Every effort will be made to accommodate all proposal submissions in meeting the deadline. PIs are requested to plan their proposal development accordingly.

### 2.1.1 Limited Submissions

#### **WHAT are limited submissions?**

Some solicitations limit the number of responses (proposals, preliminary proposals, applications, letters of intent, or nominations) that an eligible institution may submit to a particular program. These opportunities are called "limited submissions." Internal competition procedures are established to select the candidates who will submit the limited number of applications to the funding agency.

Internal Limited Submission Pre-proposals will follow either:

- A format prescribed by a specific solicitation (for example, a shortened version of a preliminary proposal identified in the solicitation)
- A format that includes a cover sheet, project summary, goals and objectives, budget estimate, specific statement specifying who will provide the cost share and a brief biosketch/CV for the PI and each Co-I.

#### **Why does the university have a limited submission review process?**

The purpose of the limited submission review process is to select the highest quality proposals that have the potential to advance the research and educational goals of AAMU.

Applications or nominations submitted without institutional endorsement or submission of a number over the limit may result in an automatic rejection of all AAMU proposals for that competition.

Internal procedures provide the vehicle and format for potential applicants to describe their project in relation to the solicitation's requirements, and allow internal reviewers to compare similar information to facilitate the selection.

An evaluation checklist will be provided to the review committee. The evaluations will be based on the following:

- Does the project fit with AAMU's strategic strengths or identified areas of interest?
- Does the project fit the agency's program objectives?
- Does the internal pre-proposal follow the internal guidelines?

Limited submissions that involve only a single department or departments within a single college may be selected by the affected department chair/s and the dean.

Limited submissions that allow for only one proposal from the institution may be reviewed by a committee in consultation with the Provost/Vice President for Research.

For opportunities where AAMU is limited to a single response, an alternate pre-proposal will be identified to proceed if the PI of the first pre-proposal selected does not meet proposal schedules or is unable to submit.

PIs must complete the Notice of Intent to Submit form and indicate solicitation is a limited submission.

### **3 Proposal Development Tutorial**

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.

#### **3.1 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.

## **3.2 Proposal Components**

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 OSP form:

### **3.2.1.1 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 [see Appendix B for the Proposal Review and Certification Form" (Proposal Cover Page)].

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.

### *3.2.1.2 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 and 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.

### *3.2.1.3 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.

### *3.2.1.4 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. All citations in the text should be compiled in a Selected Bibliography.

### *3.2.1.5 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.

### **3.2.1.6 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.

### **3.2.1.7 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.

### **3.2.1.8 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.

#### **3.2.1.9 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)?

#### **3.2.1.10 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.

#### **3.2.1.11 MANAGEMENT PLAN**

Identify key staff members, including yourself, highlight their backgrounds, and 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. Contact individuals before the proposal goes in to get their agreement to participate. Provide evidence of commitment to project if funded.

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.

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.

### *3.2.1.12 SUB AWARDS*

When it is anticipated that a portion of the work to be performed under a grant or contract is to be sub-awarded or subcontracted to an outside organization, the Principal Investigator should first contact the Office of Sponsored Programs (OSP) to make known the requirements of the subcontract. The PI must make no advance commitments, implied or otherwise, to potential subcontractors regarding the award of subcontract work. Some of the requirements that must be coordinated between the PI and Office of Office of Sponsored Programs (OSP) are listed here:

Prepare the "Statement of Work" and "Schedule of Payments" to be included in the subcontract;

Develop a list of potential bidders (if it is necessary to consider only a single source, an explanation of the reason should be provided);

Prepare and submit "Request for Proposal";

Evaluate bids received and determine the successful bidder;

Obtain sponsor approval prior to awarding of subcontract work;

Determine that adequate funds are available to cover the subcontract work;

Ensure that University and sponsor requirements are met if human subjects are involved;

Establish procedures for administering the work performed under the subcontract.

When it is known during the proposal preparation stage that subcontracting will be required, a subcontract should be prepared at that time and included in the proposal submitted. Attention to such details in the proposal stage should save time and permit smoother initiation of the project upon receipt of the award.

See the policy and procedures governing **Sub-Award Recipients and Monitoring** in this guide..

## **3.3 Budget Development**

Proposal Budgets must be carefully prepared, with attention given to details. They must not be exorbitant, but realistic in terms of reaching proposed goals.

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.

Most 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.

### 3.3.1 Budget Categories

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.

Included in the budget should be provisions for the following cost categories as specified by 2 CFR 220, Cost Principles for Educational Institutions (OMB Circular A-21).

#### 3.3.1.1 *Salaries and Wages.*

Salaries and Wages cover personnel, 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).

#### 3.3.1.2 *Fringe Benefits*

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 on the OSP website in the "OSP Forms" section. **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.

#### 3.3.1.3 *Communications*

Communications include postage, mailing service and telecommunications charges.

#### 3.3.1.4 *Travel*

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.

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

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. Current reimbursement rates and forms are located on the AAMU Comptrollers website. Use of federal diem rates are allowed for federally sponsored travel. The rates can be found at [www.gsa.gov](http://www.gsa.gov).

#### 3.3.1.5 *Contractual Services*

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.

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.

#### 3.3.1.6 *Supplies and Materials*

Supplies and Materials include items such as printing, instructional materials, office supplies, research 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.

#### 3.3.1.7 *Equipment*

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. Requests for equipment must include valid vendor quotes for the equipment item..

#### 3.3.1.8 *Participant Support*

Participant Support is a budget category that refers to direct costs that are provided for items such as tuition and fees, stipends, scholarships, subsistence allowances, travel allowances, and registrations fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects (see 2 CFR § 200.75). NSF provides additional guidance for participant costs not listed in 2 CFR § 200.75 in the *NSF Proposal and Award Policies and Procedures Guide*, (NSF 17-1), Budget and Budget Justification Participant Support (Line F on the Proposal Budget) section. (Note that the *NSF Proposal and Award Policies and Procedures Guide* is updated annually, and that the current year document should be consulted.) 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

#### 3.3.1.9 *Indirect Cost*

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 the current full rate agreement on the OSP website in the Forms section.**

### *3.3.1.10 Cost Sharing /Cost Matching*

Cost sharing, also known as cost matching are costs 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 School and the Vice President of Institutional Research, Planning and Sponsored Programs prior to submission of the proposal.**

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 IRPSP. Principal Investigators should contact IRPSP 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.**

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 vice president for IRPSP. Until the vice president 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.

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 A-110 apply for regulation and documentation of third party contributions.

## 3.4 Other Budget Considerations

### 3.4.1 Allowability, Allocability, and Reasonableness Guide

#### 3.4.1.1 *Overview*

This guide is designed to provide assistance to the faculty and administration regarding the direct charging of costs to sponsored projects while maintaining compliance with the Federal cost principles (2 CFR Part 220, formerly OMB Circular A-21) and University policies. As such, the University is responsible for ensuring that costs charged to a sponsored award are allowable, allocable, and reasonable under the Federal cost principles; and that the University's financial management system shall ensure that no one person has complete control over all aspects of a financial transaction.

In addition, sponsors may include special terms and conditions for individual awards which must be considered when incurring costs. Consult with the Office of Sponsored Programs or Grants & Contracts Accounting for assistance with any concerns or questions related to the allowability of a specific type of expense.

#### 3.4.1.2 *Allowable Costs*

All costs must be allowable under federal regulations and sponsor terms and conditions, including program-specific requirements and University policy. To be allowable, costs must:

- Be reasonable and necessary;
- Be allocable to sponsored projects under the principles and methods provided in 2 CFR Part 220;
- Be given consistent treatment; and
- Conform to any limits or exclusions set forth in 2 CFR Part 220 or the terms and conditions of the award.

2 CFR Part 220 details the allowability of particular elements of cost. When an item is questionable, the Office of Sponsored Programs or Grants & Contracts Accounting should be consulted **before** the cost is incurred.

Typical costs charged directly to a sponsored project include:

- a. Compensation of employees for performance of work under the sponsored agreement, including related fringe benefit costs;
- b. Costs of materials consumed or expended in the performance of the sponsored project;
- c. Travel in accordance with University policy; and
- d. Other allowable items of expense incurred for the sponsored project.

Costs of materials from services rendered by specialized facilities or other institutional service operations may be included as costs under federally sponsored agreements,

provided such items are:

- a. Consistently treated in similar circumstances as direct costs, rather than Facilities and Administration
- b. (indirect) costs; and
- c. Charged under a recognized method of computing actual costs.

#### 3.4.1.3 Reasonable Costs

2 CFR Part 220 defines a cost as reasonable if the nature of the goods or services acquired or applied, and the amount involved, reflect the action that a *prudent person* would have taken under the prevailing circumstances when the decision to incur the cost was made. Important considerations in determining the reasonableness of costs are:

- a. Is the cost of a type generally recognized as necessary for the operation of the University or the performance of the sponsored project?
- b. Have the requirements imposed by such factors as federal and state laws and regulations, and sponsored agreement terms and conditions been satisfied?
- c. Have the individuals concerned acted with due prudence in the circumstances, considering their responsibilities to the University, its employees, its students, the government, and the public at large?
- d. Is the extent of the actions taken with respect to the incurrence of the costs consistent with established University policies and practices applicable to the work of the institution generally, including sponsored projects?

#### 3.4.1.4 Allocable Costs

A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationship. Every incurred cost must have a direct benefit to the sponsored project being charged.

In general, a cost is allocable to a particular sponsored project if it fulfills one of the following conditions:

- a. It is incurred solely for the benefit of the work to be performed under the sponsored agreement; or
- b. It benefits both the sponsored agreement and other work of the University, in proportions that can be approximated through use of reasonable methods; or
- c. It is necessary to the overall operation of the institution and, is assignable in part to sponsored projects in accordance with 2 CFR Part 220.

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort, the cost should be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then the costs may be allocated or transferred to benefited projects on any reasonable basis, per the University's Cost Allocation Guide.

Where the purchase of equipment or other capital items is specifically authorized under a

sponsored agreement, the amounts thus authorized for such purchases are assignable to the sponsored agreement regardless of the use that may subsequently be made of the equipment or other capital items involved. Any costs allocable to a particular sponsored agreement under the standards provided in 2 CFR Part 220 may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience.

Any costs allocable to activities sponsored by industry, foreign governments, or other sponsors may not be shifted to federally sponsored agreements.

### **3.4.2 Basic Steps in Budgeting a Proposal**

- a. Specify the start and end dates of the project budget period.
- b. Decide which budget line items are required by the project.
- c. Price the items.
- d. Justify budgetary requests, in narrative form, where needed.
- e. Seek written approval from university administrators before submitting budget to sponsors via the Proposal Review and Certification form (Proposal Cover Sheet).

### **3.4.3 Policy on Indirect Cost**

Indirect cost is money provided to institutions to cover overhead cost for supporting grant operations. It costs money for a grant to operate on a campus, and it should be understood that indirect cost belongs to the institution to help defray these costs. Alabama A&M University permits a percentage of indirect costs to be returned to various units of origin:

- a. 10% -Office of Office of Sponsored Programs (OSP),
- b. 7% - School of Origin,
- c. 5% - Department of Origin,
- d. 78% would go to the University

These monies cannot be used to increase salaries. They will be used as incentives for potential PIs.

### **3.4.4 Policy on Faculty Release Time**

Alabama A&M University makes provisions for reduced teaching and/or workloads for those persons participating in funded projects. The reduction in loads corresponds to the equivalent of time spent on the projects. The work created by the teaching load reduction is reallocated by reassigning responsibilities, where appropriate, by hiring adjunct faculty, or by hiring new full-time faculty. The University will honor its commitment to release those persons who will be involved in funded research efforts.

### **3.4.5 Employment and Compensation on Research and Sponsored Program Activities**

A portion of a faculty's salary, consistent with time and effort on the project, can be charged to a grant. The total distribution of one's time cannot exceed 100%. Additionally,

grant funds cannot be used to increase one's base salary. Nine-month persons can be compensated during the summer months consistent with Alabama A&M University's policy on summer employment. *All employees who participate in sponsored programs must record time and effort as it relates to his/her specific federal project. Quarterly time & effort forms must be provided to Grants and Contracts with all required signatures.*

#### **3.4.6 Salary Supplements**

Faculty can be compensated up to an additional 25% over their base pay for work performed under outside funding. Several conditions must be met. (1) The supplement cannot accompany release time from teaching; it is intended to handle the overtime situation that occurs when teaching and research are performed during the same semester. Some situations involving large or multiple contracts may justify a combination of release time and supplementary pay. (2) The outside funding must cover the supplement and its associated indirect cost. When funds do not permit a full 25%, application may be made for a smaller supplement. (3) Application must be made and approved in advance each semester. Forms are available in the Office of Academic Affairs.

Continued high levels of funding may also justify base-pay adjustments. However, such adjustments are not addressed by this policy, but rather by the normal faculty-review process.

#### **3.4.7 Federal and State Grant Expenditures**

All expenditures exceeding \$5,000 (or \$1,500 when desired expenditures are not budgeted in the original proposal), including the employment of personnel, on federal and state grants must be cleared through the OSP.

#### **3.4.8 Transfer of Principal Investigator to another Institution**

If the principal investigator transfers from Alabama A&M University to another institution, the grant, because it is awarded to Alabama A&M University and not to the individual investigator, remains with the University, unless in petitioning to the Associate Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP), it is released. All equipment purchased with grant funds also remains with Alabama A&M University unless the P.I. requests, in writing, and is granted permission from the Associate Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP). The granting agency must also approve the proposed change of institution.

#### **3.4.9 Cost Sharing**

Many of the funding opportunities available to the University require state matching funds, sometimes to the extent of one-to-one. The University is generally supportive of proposals that show various forms of matching, such as indirect costs, supercomputer time, and even previously uncommitted funds. However, proposed matching must be coordinated with the Comptroller's Office well in advance of the proposal's due date (several weeks if possible). One must have a commitment for cost matching in advance of proposal processing.

## **4 Post-Award Procedures and Activities**

Upon receipt of an award, usually in the form of an award letter, an account having an assigned name and number must be set up in the Comptroller's Office, so that proper expenditures can be made. A Budget Request Form (see Appendix B) to the Office of Sponsored Programs (OSP) will initiate this process. No financial obligations are to be made on a grant without the award letter and the appropriate account established.

### **4.1 Award Set-Up**

Once a proposal is awarded and a budget has been approved, the award mechanism (letter, contract, grant, subcontract, etc.) will be forwarded by the Office of Sponsored Programs (OSP) to the Director, Grants & Contracts Accounting. The University Budget Approval form (budget setup form, see Appendix B) will be included with the award. The GCA Director will review the award and budget, and then forward it to the Grants & Contracts Accountant for the appropriate college to establish a new fund in Banner. After the Grants & Contracts Accountant sets up the account, an email will be sent to the Principal Investigator (or Budget Manager), OSP, Grants & Contracts Accountant, and FOMPROF setup staff with the new FOP, title, grant number, sponsor, budget manager, and budget total. A paper file will be created in GCA and the Grants & Contracts Accountant will review the award documents to determine proper invoicing and financial reporting procedures.

Once FOMPROF has been established for the new FOP, spending can begin.

### **4.2 Progress Reports**

Copies of progress and/or final reports are to be filed in the OSP. It is the Principal Investigator's responsibility to provide these reports in a timely manner in order to meet the agency deadline.

### **4.3 No Cost Extension**

Some funding agencies grant "no cost" extensions for funds not obligated at the end of a grant period. Specific guidelines for the particular agency must be checked. Usually there is a time frame in which such a request has to be made.

### **4.4 Purchasing and Accounting**

Once an award is made, there are some logistics that must either be in place or put in place to increase the chances that proposal objectives are met and that policies and procedures of the granting agency as well as those of the university are followed.

**Requisition** - Requisitions are made routinely with the appropriate account name and number (accounts are set up for funded projects in the Comptroller's Office via a budget set-up process involving the Office of Sponsored Programs (OSP) and Grants and Contract Accounting. The Budget Approval Form (budget setup) is contained in Appendix B.

**Purchase Order** - The Purchase Order (PO) is the official document authorizing the purchase of requested items. POs are issued from the Chief Purchasing Officer in the Purchasing Department.

**The Bid Process** - Alabama State Law requires that purchases of \$7,500.00 and above (not including sale tax) to any one vendor must be put out to bid. Normally this takes from 30 to 60 days. (For more information on rules and restrictions, contact the Purchasing Department).

## **5 Compliance**

The federal government mandates that Alabama A&M University has the ultimate responsibility to ensure that any research conducted on or off campus, including collaborative research with other institutions, is conducted in compliance with University, local, state, federal and funding agency regulations. It is also the responsibility of the institution to ensure that the rights and welfare of human subjects, the welfare of animals, the rights of the investigator, the environment and the community are protected. The Office of Research Compliance (ORC) and OSP are authorized to provide this oversight for the institution. The Research and Sponsored Programs Compliance Plan (Research Compliance Manual, see Appendix C) provides additional guidance to the University regarding the responsible conduct of research.

To ensure with compliance of this mandate, the Director, Office of Research Compliance (DoRC) and the OSP Executive Director will continually monitor, analyze and evaluate the adequacy and effectiveness of the University's system of internal controls when compared to established research standards. Alabama A & M University is committed to meeting those standards and to be strong in research compliance. These internal controls will be combined with education, training, effective communication and teamwork to fulfill this mission and responsibility.

Research is defined in the Code of Federal Regulations (45 CFR 46) as "...a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge. Activities that meet this definition constitute research for purposes of this policy, whether or not they are conducted or supported under a program that is considered research for other purposes. For example, some demonstration and service programs may include research." Therefore, research projects that are the responsibility of Alabama A & M University include projects conducted by undergraduate and graduate students, projects for academic credit, research that involves University resources, research that will result in publication or licensing, and projects funded both internally and externally.

The Office of Research Compliance also acts as a resource for the university community and public concerning research compliance requirements and coordinates compliance measures on campus. This includes the use of human subjects in research, control of biohazards and radiation safety. The ORC also develops, modifies and implements regular, effective education and training programs targeted to specific research compliance issues, policies, procedures and processes.



## **5.1 Policies and Procedures**

The following procedures and regulations, in concert with the Research Compliance Manual, govern all research at the University, whether externally or internally funded. Depending on the research topic and conditions necessary for successful project implementation and completion, special circumstances may be encountered which require extra measures of precaution. Adhering to the appropriate procedures will ensure that the University policies specifically pertaining to the situations as well as the minimal federal, state and local laws and regulations are met. Included are: Human Subjects in Research; Animal Subjects in Research; Biohazards; Hazardous Waste; and Patent and Copyright Policies of the University. Also included is a summary of the NIH Policy on Scientific Misconduct.

### **5.1.1 Secret or Classified Research**

As a public land-grant institution with a trifold mission to serve the surrounding community and state through the dissemination of knowledge (teaching, research, extension), Alabama A&M University does not currently accept grants or contracts for research which have any security classifications or preclude the open disclosure of research results.

Projects which require non-disclosure agreements or other restrictions will be addressed on a case-by-case basis.

### **5.1.2 Publications Policy**

The University will not enter into any agreement with a research sponsor that restricts the faculty or staff's right to publish the results of that research, with the following exceptions:

- a. Upon request, the University can agree not to disclose or publish without the sponsor's approval any sponsor-furnished information, nor reveal to others specific applications of the research results or operations of the sponsor.
- b. Upon request, the University can agree to provide the sponsor a copy of any report or manuscript containing the results of research at first availability and prior to publication.
- c. Upon request, the University can agree to delay publication of information concerning an invention for a period of no longer than twelve months from the date of submission of the manuscript by the principal investigator to the sponsor, or until a U.S. patent application has been filed, whichever represents the shorter interval of time. With governmental sponsors, publication may be delayed indefinitely for reasons of public policy. Any sponsor may waive a previously agreed-upon delay period, thus permitting immediate publication. The submission and cataloging of any thesis or dissertation prepared by a graduate student in fulfillment of an academic requirement is exempt from any delay or review by the

sponsor.

### **5.1.3 Intellectual Property**

During the agreed-upon term of sponsored research, it might be necessary or desirable for a sponsor to entrust to Alabama A&M University certain materials business or technical information, or data in confidence during the term of sponsored research and for a reasonable period of time beyond such term. The University; however, is not obligated to treat as confidential any information, which is: (1) public information; (2) already known to the University or its personnel; (3) independently developed by University personnel; or (4) required by a court order to be disclosed. The University further agrees to return to sponsor or destroy any such proprietary materials, information, or data and all copies of such upon request. The sponsor agrees to identify clearly such materials, information, or data it considers to be proprietary in writing at the time of transmittal to the University.

### **5.1.4 Human Subjects in Research**

Purpose: To establish local institutional policies and procedures for implementation of federal policy safeguarding the rights and welfare of humans involved as subjects in experimental projects and research.

The Vice President for Research is the University official responsible for safeguarding the rights and welfare of human subjects involved in research activities. This responsibility has been delegated to the Institutional Review Board for the Protection of Human Subjects (IRB). Any project originating at Alabama A&M University which uses human subjects, including self-experimentation, is subject to review and approval by the Institutional Review Board. This review shall determine that:

- a. The rights and welfare of the subjects involved are adequately protected.
- b. The risks to an individual - physical, psychological, or social - as a result of any activity which exceeds the application of accepted routines necessary to meet his needs are outweighed by potential benefits to society.
- c. Legal informed consent is obtained by appropriate and adequate methods.
- d. Approval must be obtained before the project is initiated.

All projects involving human subjects and requesting funds from external sources should have approval of the Institutional Review Board prior to submission to the agency, or the protocol must be submitted to the Committee concurrently with submission to the agency. If the project is to be carried out at a facility not associated with Alabama A&M University, the principal Investigator is obligated to follow that organization's guidelines as well. This procedure applies to all activities involving human subjects conducted by Alabama A&M University personnel regardless of the source of support.

The determination of the risk-to-benefit ratio is primarily the application of common sense and sound professional judgment to the proposed activity. Questions concerning what constitutes risk should be addressed to the Chairman of the Institutional Review Board during the planning stages of the proposal.

#### 5.1.4.1 *Procedures for IRB Review:*

Principal investigators submitting proposals involving the use of human subjects must check *Human Subjects* in the *Project Requirements* section of the *Proposal Review and Certification Form*.

Principal investigators must allow sufficient time for review and approval of the Institutional Review Board in the proposal submission and internal review/approval process. Clearance will be indicated from the IRB Chair after verification of submission and /or approval of an IRB application according to Agency requirements

Faculty, researchers and graduate students planning research for projects and/or dissertations other than proposals for funded research must also complete an IRB application form and obtain approval from the IRB before research can proceed.

Contact the IRB Chair for the appropriate Agency Requirements for the protection of human subjects.

#### 5.1.5 **Animal Subjects in Research**

Purpose: To establish local institutional policies and procedures for implementing federal policy governing the welfare of animals used by University personnel for research.

An animal is defined to be any living vertebrate organism used or intended for use in research, experimentation, testing, training, teaching, or related purposes. The definition includes, but is not limited to, dogs, cats, rodents, primates, large domesticated animals, poultry, wild-captured animals, and aquatic animals used for these purposes.

All policies established for laboratory animal care at Alabama A&M University shall meet the standards set forth by the National Institutes of Health (NIH) "Guide for the Care and Use of Laboratory Animals" (U.S. Department of Health, Education and Welfare Publication No. [NIH] 78-23, 1978) and all revisions thereof. Additionally, the University shall uphold federal laws relating to the use of laboratory animals (Publications 89-544 and 91-579).

Federal laws and regulations define and prescribe the rules for obtaining, maintaining, transporting and disposing of animals, other than farm animal, used for research purposes. Failure to comply with these rules and regulations can result in the loss of federal funding for the University. To comply with these regulations, an Institutional Animal Care Committee (IACUC) has been established to implement and administer the University policy on animal welfare. All research, sponsored or non-sponsored, involving animal subjects must be reviewed by the IACUC to assure that it conforms to the University's policies governing animal care and welfare as set forth in the NIH Guide.

#### 5.1.5.1 *Procedures for IACUC Review:*

Principal investigators proposing to conduct research that involves the use of animals must check *Animal Welfare* in the *Project Requirements* section of the *Proposal Review*

*and Certification Form.*

The IACUC will evaluate the protocol to determine whether it conforms to the University's policies governing animal welfare as set forth in the NIH Guide. The Committee may approve or disapprove the protocol. If it is disapproved, the Committee may advise the principal investigator on ways of altering the protocol to bring it into compliance with University policy.

Principal investigators must allow sufficient time for review and approval of the IACUC in the proposal submission and internal review/approval process. Clearance will be indicated from the IACUC Chair after verification of submission and /or approval of an IACUC application according to Agency requirements

### **5.1.6 Biohazards**

Purpose: To monitor the extent of biohazards use in University research.

The term "biohazards" generally refers to chemical carcinogens, mutagens, teratogens, and all microbiological agents and radiological hazards. Common compounds that fall into these groups are asbestos, arsenic, benzene, carbon tetrachloride, chloroform, aflatoxin, urethane, and vinyl chloride. Radioactive materials, x-rays, lasers and microwaves represent common radiological risks.

University policies governing the use of biologically hazardous materials shall be set by an appointed University Institutional Biosafety Committee (IBC). It is the responsibility of the principal investigator to be fully knowledgeable about the potential risks and to practice proper care and handling of such materials and generating devices. The Institutional Biosafety Committee, Environmental Health and Safety, and the Radiation Safety Committee A Biohazards Safety Committee will work together to ensure proper review is obtained for proposal submissions for external funding for projects involving the use and/or handling of biohazards.

#### *5.1.6.1 Procedures for Biohazard Review :*

Principal investigators proposing to conduct research involving general biohazards should check *Biohazards Review* in the *Project Requirements* section of the *Proposal Review and Certification Form*.

The Office of Sponsored Programs (OSP) will refer all proposals for research activity involving biohazards to the IBC for review and approval. Principal investigators are encouraged to consult with this committee early in the proposal development process to identify and resolve potential problems and questions concerning biohazard handling and use.

Principal investigators should allow ample time for review and approval of the IBC in the proposal submission and internal review/approval process. Clearance will be indicated from the IBC Chair or other appropriate compliance committee after verification of submission and /or approval of an application to the IBC or other appropriate compliance committee according to Agency requirements.

## 5.1.7 Hazardous Waste

Purpose: To alert the people reviewing the proposal that hazardous waste will be generated during conduct of the project and that provisions have been made for disposal of this waste in accordance with University regulations.

### 5.1.7.1 *Procedures for Hazardous Waste Review:*

The principal investigator should write a memorandum stating arrangements have been made for disposal of any hazardous waste generated during the project. The principal investigator and the person responsible for disposing of the waste should sign the memorandum. The memorandum should be included with the *Proposal Review and Certification Form* and filed with the proposal. The Institutional Biosafety Committee, Environmental Health and Safety, and the Radiation Safety Committee will work together as required to ensure University policy governing the handling and disposal of toxic and hazardous wastes is followed. Review and approval of the appropriate committee is required for proposals of projects requesting external funds for research generating measurable hazardous waste.

## 5.1.8 Hazardous Research Areas, Occupational Safety and Health

Sponsors are not legally responsible for accidents, illness or claims arising out of any work undertaken with the assistance of a grant or contract. The University and the Principal Investigator are expected to take the steps necessary to insure and protect the University and its personnel and to comply with the applicable standards issued pursuant to the National Occupational, Safety and Health Act. Sections of the Act, where applicable, must be followed.

The Institutional Biosafety Committee, Environmental Health and Safety, and the Radiation Safety Committee will work together as required to ensure University policy governing the storage and handling of hazardous materials in areas of high risk is upheld at all times.

All persons who enter the buildings, classrooms, and laboratories owned by the University do so at their own risk. Areas of particularly high risk, such as laboratories, greenhouses, research areas, etc., where carcinogens, radioactive, toxic or other hazardous materials and/or conditions exist or potentially exist, shall be designated by a clearly visible warning message posted at or near the entrance as a "Potentially Hazardous Research Area."

## 5.1.9 Copyright Policy

It is not the intent of Alabama A&M University to infringe upon the rights of faculty, staff, and students to write or otherwise generate on their own original copyrightable materials for which they have sole rights of ownership and disposition.

The University does, however, claim property rights to copyrightable materials when it provides the facilities, salaries, or other support for the express purpose of creating such materials. Included are such items as books, pamphlets, or other printed matter; film, videotape and audio recordings; computer programs or computer-based

instructional materials; or any other items covered by the Federal Copyright Act now existent or as later amended.

The University faculty, staff, and student body are encouraged to contact the Office of Office of Sponsored Programs (OSP) for sources of information or technical advice for questions concerning protection of their individual rights to materials they have generated or questions involving the use of currently copyrighted materials in their work as teachers, scholars, and creators of their own copyrightable materials.

Whenever University personnel are employed or directed by their department chairman, dean or other University officer, to generate specific works subject to copyright, the following shall apply:

- a. The chairman, dean or officer shall decide whether or not the material will be produced and distributed with copyright protection. In the interest of free dissemination of knowledge, materials produced by faculty, ordinarily will not be copyrighted by the University. However, if the cost of producing the materials must be recovered from sales, or if there is other good reason, the materials shall be copyrighted in the name of Alabama A&M University, or in the name of a publisher with whom the University will enter into a contract.
- b. If the materials are to be copyrighted, the author(s) and, if appropriate, publisher shall enter into a copyright agreement with Alabama A&M University. Property rights to the materials shall be divided among the University, the author(s), and the publisher in an equitable manner, reflecting the contribution made by each party to the finished materials. The copyright agreement shall be signed by all parties before work on the project begins. The Associate Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP), as designated by the University President, shall sign for the University. The author(s) of such copyrightable materials shall be considered as creating the work for hire by the University.
- c. Nothing in this policy shall nullify or preempt the copyright provision of any grant or contract accepted by the University from a research sponsor, governmental or private, when such contracts or grants provide the sponsor with specified rights to the materials developed from research or when such contracts or grants limit the right of the copyright.

#### **5.1.10 Patent Policy**

See Appendix D

#### **5.1.11 Dealing with Possible Research 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 means fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.

- a. Fabrication is making up data or results and recording or reporting them.
- b. Falsification is manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately

- represented in the research record.
- c. Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.
  - d. Research misconduct does not include honest error or differences of opinion.

In addition to the items above, the university addresses other core areas of responsible conduct of research (RCR), including: Data acquisition, management, sharing and ownership; mentor/trainee responsibilities; collaborative science; conflicts of interest and commitment; publication practices and responsible authorship; and peer review.

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 Vice President for Research or the Office of Research Compliance 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

### **5.1.12 Time and Effort Reporting: Certifying Effort on Sponsored Projects**

#### *5.1.12.1 Scope*

This document sets forth the University's policy on certification of effort expended on sponsored project awards administered by Alabama Agricultural & Mechanical University ("University"). This Policy applies to all individuals who commit and devote effort to a sponsored project as well as those individuals involved in certifying the effort of individuals on a sponsored project.

#### *5.1.12.2 Purpose of the Policy*

This policy ensures that effort certifications completed in connection with University sponsored projects are accurate, reasonably reflect the actual level of effort expended on a sponsored project, and comply with sponsor requirements. As a condition of receiving sponsored awards, the University must assure sponsors that the effort expended on their sponsored projects justifies the salary charged to those projects. In addition, the University must assure sponsors that the commitment indicated (including mandatory and voluntary committed cost sharing) in the proposal and subsequent award is met in accordance with the sponsor's terms and conditions. The University provides this assurance by requiring periodic effort reports for each individual whose salary is charged to one or more sponsored projects and/or cost sharing accounts during the effort reporting. Completed effort reports indicate the percentages of the individual's total effort that are dedicated to the sponsored project(s) and other University activities, and require a certification that the reported effort percentages are reasonable and accurate.

Each faculty member must be aware of his/her level of committed effort to sponsored projects, their ability to meet those commitments in light of any other University obligations they may have and to communicate any significant changes in level of sponsored projects effort to his/her respective business office.

Financial penalties, expenditure disallowances, and harm to the University's reputation could result from failure to provide accurate effort certifications or failure to comply with

the University's effort reporting requirements. All individuals involved in the effort certification process are expected to abide strictly by the provisions of this policy.

### 5.1.12.3 Policy Statement

The University is committed to ensuring that effort reports completed in connection with sponsored projects are accurate.

All faculty and staff who are involved in allocating salaries and wages to sponsored projects, managing sponsored projects, or completing effort reports are responsible for understanding the principles of accurate and timely effort reporting. In no case can the percentage of an individual's salary charged to a sponsored project exceed the percentage of the individual's total effort that is expended on the project during an effort reporting period.

If the percentage of total effort expended in a given effort reporting period is less than the percentage of salary charged to the sponsored project during the period, the salary charges must be reduced to reflect actual effort.

#### **What is "effort certification?"**

Effort certification is a process in which the proportion of the employee's salary charged directly to a sponsored project or committed as cost-share is calculated as a percent of Institutional Base Salary (IBS). The employee is asked to certify that this percent salary distribution reasonably reflects his/her Total Institutional Effort during the reporting period.

#### **To whom does the effort certification requirement apply?**

Effort certification is required of all salaried (i.e., "exempt") employees (faculty, administrative/professional staff, and graduate assistants) who are compensated from, or contribute mandatory or voluntary committed time as cost share, to a sponsored project as part of their Total Institutional Effort. Employees who are paid hourly (non-exempt staff, student assistants, and casual laborers) do not participate in the effort certification program. These individuals complete a daily timecard that records hours worked on the sponsored project and, when approved by the supervisor (generally the Principal Investigator/Project Director), serves as documentation of effort.

#### **Why must effort be certified?**

Effort certification is required because salaried employees do not keep detailed time records to document their activity. It is an alternate method for assuring that individuals who are paid with federal funds have contributed the required effort. The requirement for effort certification is set forth in *OMB Circular A-21: Cost Principles for Higher Education Institutions*, which applies to any federally funded grant, cooperative agreement, contract, sub award, or subcontract. *OMB Circular A-21* provides the rules regarding allowability and allocability of costs on federal awards, including compensation for personnel services, as well acceptable methods of effort certification. For consistency, the University extends effort certification requirements to



all non- federally funded sponsored projects.

### **What is “Institutional Base Salary (IBS)?”**

An individual’s Institutional Base Salary (IBS) is the annual compensation paid by the university for his/her Total Institutional Effort, whether that individual’s time is spent on teaching, research, service, administration, or other regular assigned activities. IBS may include salary supplements for assigned extra duties but excludes extra compensation for incidental work, including overload pay.

### **What is “Total Institutional Effort?”**

Total Institutional Effort includes all activities that the institution expects the employee to perform (i.e., a full workload or all regularly assigned job responsibilities) in exchange for his/her Institutional Base Salary (IBS) compensation, regardless of the number of hours the employee works. Total Institutional Effort does not include incidental work (i.e., work performed for the university on an infrequent and short-term basis that is in excess of normal for the individual) for which extra compensation is received. Separately compensated external (private) consulting and other outside professional activities are not included in Total Institutional Effort.

### **Why is work for extra compensation not considered part of Total Institutional Effort?**

Federal regulations allow the exclusion of incidental effort (i.e., work performed for the university on an infrequent and short-term basis that is in excess of normal for the individual) for which the employee is additionally compensated above his/her Institutional Base Pay if such compensation is paid under institutional policy and is separately identified and documented in the institution’s financial management system. Since extra compensation is initiated by use of a specific document and coded separately in the accounting system, these requirements are met, allowing the university to exclude the incidental work associated with the extra compensation to be excluded from the effort certification process. Signature of the employee on the extra compensation form bearing a sponsored programs account number is the employee’s verification that the work performed for that extra compensation will be related to the sponsored project.

### **How is an individual’s distribution of effort determined?**

The University employs an “after-the-fact” effort certification method, one of three methods prescribed by *OMB Circular A-21*. The portion of effort to be charged or committed to the sponsored project is initially estimated during proposal development. Upon award, the Grants & Contracts Accountant completes the paperwork necessary, with Principal Investigator/Project Director approval, to charge the proposed effort to the sponsored project account and/or its associated cost-share account.

At the close of each reporting period, salary distribution is calculated in percentages. The numerator represents compensation from the sponsored project or associated cost share account, and the denominator is the Institutional Base Salary. In most cases, the salary distribution reasonably reflects the actual distribution of effort. When it does not, the employee is asked to make corrections before certifying his/her effort.

### **How can an individual assure that the effort he/she is certifying is reasonably represented by the salary distribution percentages?**

The federal government does not require faculty and other salaried personnel to keep time records indicating the number of hours or days worked on a sponsored project. Most individuals working on a single sponsored project do not have difficulty estimating the actual percentage of effort devoted to the project on a semester basis. However, individuals working on more than one sponsored project or those who work only sporadically on a single sponsored project during the semester may find it more difficult to estimate actual effort from memory. Employees are encouraged to document their time in the manner that will best assist them in comparing actual effort to the salary distribution reported on the certification form. Such documentation, although not required, could become auditable, and so a commitment to maintaining an individual tracking system should also include a commitment to apply it consistently and accurately.

### **What is the definition of “reasonable” when one compares salary distribution to actual effort?**

The federal government recognizes that, “in an academic setting, teaching, research, service, and administration are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance, therefore, is placed on **estimates** [*emphasis added*] in which a degree of tolerance is appropriate” (*OMB Circular A-21, Section J.10*). In accordance with a 1979 interpretation by the U.S. Department of Health and Human Services, the University defines “reasonable” as no more than + 5% variance in effort distribution from the salary distribution percentages reported. The percent variance allowed is a percent of the Total Institutional Effort.

For example, if 50% of an individual’s salary is paid by a grant, no adjustment to the level of effort indicated on the certification form would be required if the individual’s effort could reasonably be determined to fall between 45 and 55%. However, if the individual certifies effort at, for example, only 30%, an after-the-fact salary reallocation would be required to reduce the salary charges to the sponsored project.

### **What should the employee do if the percentages are not accurate?**

The employee should individually review the effort form to determine if the distribution of salary during the reporting period provides a reasonable representation of effort during that period. “Reasonable” is defined as no more than + 5% variance in effort distribution from the salary distribution percentages reported. If the salary distribution is not a reasonable representation of effort, the employee should make corrections on the certification form to indicate actual effort distribution, and then sign the certification statement. The employee should keep in mind that total effort must always equal 100%. If the employee changes one percentage figure to reflect a different level of effort, a corresponding change must be made in another category to keep total effort at 100%.

In all cases, if the salary distribution presented on the effort form is not a reasonable representation of the distribution of the individual’s total effort performed for the University during the reporting period, the individual should make appropriate changes

before certifying. In the event the proportion of the effort on the sponsored project significantly exceeds (i.e. > +5%) the proportion of payroll charged to the sponsored project account, no change in the charges to the sponsored project are generally required. If, however, the individual's actual effort is significantly less than the proportion of his/her compensation that is charged to the sponsored project, reduction of the personnel costs charged to the sponsored project account during the reporting period will likely be necessary.

### **Can someone else sign the effort certification form for an employee?**

Employees should certify their own effort when possible. If someone else signs for the employee, he/she must have firsthand knowledge of the employee's work on the project. Although the federal government does not define "firsthand knowledge," an auditor may closely question the signer about the exact nature of his/her firsthand knowledge. Graduate assistants, departmental clerical staff, and even department heads/unit directors rarely have the kind of firsthand knowledge necessary to certify effort for another individual. Thus, a PI/PD signing for an employee who is no longer at the institution is the most usual case of an alternate certification signature. Alternate certification in other cases should be rare and will likely involve a special circumstance.

### **Should the Principal Investigator/Project Director approve other employees' certification forms?**

An approval signature in addition to the employee's signature is neither required nor desired. An approver can be questioned about the nature of firsthand knowledge of the employee's work during audit. Thus, since there is no federal requirement for an approval signature, this practice is discouraged.

### **What are the "trouble spots" in effort certification?**

There are a number of specific practices or possible deficiencies in an institution's effort certification system that auditors and inspectors generally examine. Any effort certification that totals to something other than 100% automatically invites detailed scrutiny. Thinking that a standard "40 hour work week" has application to effort reporting can lead to this kind of miscalculation of total effort. An employee is improperly reporting effort if, proceeding on this assumption, he/she reports an allocation of 50% of his/her total effort to a sponsored project based on having devoted 20 hours per week to the project, when the 20 hours actually reflects a smaller proportion of his/her overall work. Likewise, a researcher who has spent many hours mentoring a promising graduate student erroneously thinks, "I do that on my own time." These well-intentioned beliefs can result in costly mistakes because they fail to recognize that effort on a sponsored project must be measured against "Total Institutional Effort" as described earlier.

Other "red flag" areas for auditors are completeness and timeliness of certification. Late, unsigned, or missing effort reports will likely raise questions. Effort reports that appear to have been signed in batches can be problematic. "Corrected" effort reports may draw an auditor's attention; this is especially true when the "corrected" effort certifications lead to an unusually large number of payroll cost transfers. Employees who need to correct effort certifications should keep meticulous documentation in order to be able to explain why the correction was necessary. This explanation may be

required in an audit conducted years later when memories have faded, and it may have to be delivered to potentially skeptical federal auditors and officials. Finally, simply “correcting” effort certifications near the end of the term of a sponsored project in order to “spend out” unused funds presents such egregious non-compliance that criminal charges may be made under the False Claims Act.

### **What are the potential consequences of inaccurate or non-timely effort certification?**

Effort certifications provide the basis for institutional claims for reimbursement of direct and indirect charges under a federal grant or contract. Inaccurate or fraudulent reports may give rise to a False Claims Act (31 U.S.C. § 3729 *et seq.*) lawsuit. An individual who is found to have violated this Act can be subjected to civil penalties of not less than \$5,000 nor more than \$10,000 for each violation; to criminal sanctions, if the violation was willful, of imprisonment for up to five years and fines of up to \$25,000; and to an order to reimburse the government for treble the damages sustained by the government because of the individual’s act. There have been instances in which individual researchers have been required to make substantial civil monetary reimbursements to the federal government because of their involvement in improper effort certifications. Of course, the institution can suffer as well from False Claims Act violations by its employees. Institutional sanctions may include the payment of costly settlements or even debarment from participating in federally funded research. The issue of compliance with effort certification requirements should always be approached with these potentially heavy sanctions for violations in mind.

Every institution that receives federal grant or contract funds must abide by the same rules, including implementing an accurate effort certification system and ensuring that the federal government is not overbilled for effort that did not occur. Auditors may elect to review the effort certification system of any institution at any time, regardless of the type of institution or the size of its sponsored programs portfolio. Although the small size of an institution or a relatively modest volume of federally funded research may lower the probability of an effort certification audit, if it should occur, the magnitude of the impact of audit disallowances or a False Claims Act suit would be substantially greater, as small institutions generally do not have large monetary reserves from which to pay for disallowances, fines, settlements, and attorneys’ fees. Thus, any institution, regardless of size, is remiss if effort certification is not taken seriously and is not done in a way that satisfies federal regulations and ensures that the federal government is not overcharged for personnel time on sponsored projects.

### **5.1.13 Procedures for Time and Effort Reporting**

All personnel paid from research funds - including principal investigators, co-investigators, senior personnel, other personnel, and graduate students – must record time and effort on the AAMU OSP Time and Effort Report Form (see Appendix B), and certify that information is correct. Completed reports are due to the Office of Sponsored Programs by the 15<sup>th</sup> of the month after the end of each quarter. A notification will be sent at the end of the month prior to the 15<sup>th</sup> due date as a reminder.

Compliance is mandatory. Failure to submit the required Time and Effort Report may result in the suspension of all accounts associated with project fund numbers.

### *Quarterly Reporting Periods*

Reporting Period	Due Date	Period Covered
1 <sup>st</sup> Quarter	January 15	October-November-December previous year
2 <sup>nd</sup> Quarter	April 15	January-February-March
3 <sup>rd</sup> Quarter	July 15	April-May-June
4 <sup>th</sup> Quarter	October 15	July-August-September

#### **5.1.14 Conflict of Interest**

Alabama A&M University faculty is made up of highly trained professionals, many of them of national and international reputation, representing a significant reservoir of human resources. Services of this group are available to the various sectors of society for the mutual benefit of government, industry, the academic community and society at large. Outside employment and activities are encouraged, provided they do not detract from full and competent performance of a faculty member's duties and responsibilities.

The information presented below concerning conflict of interest has been adapted from the Joint Statement of the Council of the American Association of University Professors and the American Council on Education, December 1964, and is intended for the guidance of University faculty members engaged in research.

##### *5.1.14.1 Outside Interests*

When a University faculty member undertaking or engaging in a program has a significant financial interest in, or a consulting arrangement with a private business concern, it is important to avoid actual or apparent conflicts of interest between University obligations and outside interests and other obligations. Situations in or from which conflicts of interest might arise are the following:

Orienting University activities to serve the needs of private firms without disclosing such orientation to the University and to the sponsoring agency.

Purchasing major equipment, instruments, materials, or other items for a sponsored program from the private firm in which the faculty member has an interest without disclosing such interest.

Transmitting to the private firm or using for personal gain work products, results, material, or information from sponsored programs that are not made generally available to others (this includes licensing arrangements for inventions or consulting on the basis of sponsored research results).

Use for personal gain or other unauthorized use of privileged information acquired in connection with the faculty member's sponsored activities (the term "privileged

information" includes, but is not limited to, medical, personnel, or security of individuals, or knowledge of forthcoming programs).

Negotiation or influence on the negotiation of contracts, related to the faculty member's sponsored program, between the University and organizations with which he/she has consulting or other significant relationships.

Acceptance of gratuities or special favors from organizations with which the University does or may conduct business in connection with a sponsored project, or extension of gratuities or special favors to employees of the sponsoring organization, under circumstances that might reasonably be interpreted as an attempt to influence the recipients in the conduct of their duties.

#### *5.1.14.2 - Other Potential Conflicts of Interest*

When the principal investigator consults for one or more organizations in the same technical field as the sponsored program, care must be taken to avoid giving advice that may be of questionable objectivity because of possible bearing on the faculty member's other interest. In undertaking and performing consulting services, full disclosure of such interests should be made to the University and to the sponsor insofar as they may appear to relate to the work at the University or for the sponsor. Conflict of interest problems could arise, for example, in the participation of a faculty member of the University in an evaluation for the sponsor on some technical aspect of the work of another organization with which the faculty member has or had a significant consulting or employment relationship or a significant financial interest, or in an evaluation of a competitor to such other organization.

In addition to other state or University Conflict of Interest policies, AAMU principal investigators and co-investigators comply with federal regulations via the AAMU Conflict of Interest Disclosure Form (see Appendix B). The COI Disclosure Form is mandatory, and must be completed by each principle investigator/project director and each co-investigator prior to the new award budget setup.

#### *5.1.14.3 - Distribution of Staff Effort*

There are competing demands on the energies of a faculty member. The way in which effort is divided among these various functions does not raise ethical questions unless the organization supporting the research is misled in its understanding of the amount of intellectual effort actually devoted to the research in question.

If the agreement stipulates that a faculty member will devote a certain fraction of effort to the sponsored program or assume responsibility in relation to such research, a corresponding measure of actual involvement is to be expected. See *Time and Effort Reporting: Certifying Effort on Sponsored Programs* in this guide for more information.

### **5.1.15 Anti-Lobbying**

Federal agencies require that the University provide assurance (via Standard Form LLL) that no federally appropriated funds have been paid or will be paid, by or on behalf of the person signing the assurance, to any person for influencing or attempting to influence an officer or an employee of any agency; a member of congress, an officer or employee of congress, or an employee of a member of congress in connection with the awarding of any federal contract or grant; the making of any federal loans; the entering into of a cooperative agreement; and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement. If any funds other than federally appropriated funds have been paid for the services mentioned above, the PI is required to complete and submit Standard Form LLL-A, "Disclosure Form to Report Lobbying," in accordance with its instructions. This certification is a pre-award requirement. Appropriate forms should be part of the application package or may be secured from the Office of Sponsored Programs (OSP).

### **5.1.16 Civil Rights, Handicapped Individuals, Age and Sex Discrimination**

The University must provide assurance of compliance with the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments, and the Age Discrimination Act of 1975. Alabama A&M University assures that it will prohibit discrimination on the basis of race, color, national origin, handicap, sex, and age in all programs or activities receiving Federal financial assistance. The institution agrees that compliance with this assurance constitutes a condition of continued receipt of assistance, and that it is binding upon the applicant, its successors, transferees, and assignees for the period during which such assistance is provided. Furthermore, the University assures that all contractors, subcontractors, subgrantees or others with whom it arranges to provide services or benefits in connection with its education programs or activities are not discriminating or in violation of the above statutes, regulations, guidelines, and standards. The University will have on file with all of the Federal agencies, any required documentation of its compliance with the Civil Rights Act of 1964 and relevant amendments.

### **5.1.17 Drug-Free Workplace**

Alabama A&M University operates in compliance with the Drug-Free Workplace Act of 1989, the Higher Education Act of 1965 (Section 1213) and the Drug-Free Schools and Communities Amendments of 1989 (P.L. 101-226, Section 22), and certifies that it strives to provide and maintain a drug-free workplace. Federal regulations require that for all grants awarded after March 18, 1989, the applicant must provide certification that it will maintain a drug-free workplace, and that otherwise federal funding may be withheld. The University operates in conformance with all federal drug-free workplace requirements and has established a Center for Drug Abuse Prevention and Education under the supervision of a full time director. All required drug-free workplace documentation will accompany grant or contract application submittals originating from Alabama A&M University. If these forms are not part of the application package, they should be secured from the Office of Office of Sponsored Programs (OSP).

### **5.1.18 Debarment and Suspension**

Certification regarding debarment, suspension, and other responsibility matters is required by the regulations implementing Executive order 12549, Debarment and Suspension, 34 CFR Part 85, Section 85.510. The prospective applicant certifies to the best of his knowledge and belief that its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency; have not been convicted of or had a civil judgment rendered against them for fraud or a criminal offense in connection with obtaining or performing a public transaction; are not presently indicted for or otherwise criminally or civilly charged by a government entity; and have not had one or more public transactions terminated for cause or default within a three-year period preceding the application/proposal. Use applicable agency forms. This is a pre- award requirement.

### **5.1.19 Non-Delinquency on Federal Debts**

The Department of Health and Human Services, Public Health Service (PHS) requires that individuals submitting applications for fellowships or research service awards from PHS and individuals signing grant applications as the applicant organization's authorized representative are required to certify as to their non-delinquency on Federal debt (face page of Form PHS 416-1 for individuals and face page of Form PHS 398 for organizations). Federal debt includes delinquent taxes, audit disallowance, guaranteed or direct student loans, Federal Housing Administration (FHA) loans, business loans, and other miscellaneous administrative debts. This certification is a pre-award requirement.

### **5.1.20 Health and Safety**

Alabama A&M University is committed to provide a safe and healthy environment for its employees and students. The University assures that regulations pertaining to compliance requirements for health and safety standards in the workplace are enforced, including compliance with Occupational Safety and Health Association (OSHA) regulations. A Research Safety Committee ensures that the University is protected from toxic and nuisance substances, flammable materials, and fire. In addition this committee ensures that all sources of ionizing radiation (including biohazard radiation and radioactive materials) at the University are used safely and in a manner which complies with applicable Federal and State regulations. The Research Safety Committee is appointed by and reports to the Associate Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP).

### **5.1.21 Programmatic Compliance/Technical Reports**

Federal sponsoring and other grant agencies require specific information about program performance. Grant proposal guidelines usually inform the project director of reporting requirements. The PI/PPD is responsible for managing the day-to-day operations of grant and sponsored activities and must monitor project activities to ensure compliance with applicable agency requirements and that performance goals are being achieved.



Performance reports shall normally contain brief information on the following:

- a. A comparison of actual accomplishments with the objectives established in the proposal;
- b. An explanation for not meeting established objectives;
- c. Analysis and explanation for cost overruns;
- d. Other applicable information required by the sponsoring agency.

The sponsoring agency should be notified of developments, which may have significant impact on the grant or sponsored activity. Specifically, the agency should be notified of:

- a. Problems or delays which may impair the ability to meet the proposed objectives;
- b. Favorable developments which will permit the PI/PD to meet objectives sooner than scheduled or at less cost than anticipated.

All project directors are asked to inform the Office of Office of Sponsored Programs (OSP) of all compliance requirements mandated by the agency at the time of receiving the award. In addition, project directors are encouraged to present a file copy for OSP records of all reports to sponsoring agencies.

#### **5.1.22 Consultant Payments**

Compensation for those persons who are not filling an established position and are being paid on a one-time basis when work is completed is termed consultant payment. Payment for consulting must be supported by a written agreement signed by the consultant and by an authorized project representative. The agreement must include a detailed statement as to the duties and responsibilities of the consultant. Consultancies that are over \$10,000 require a different form and they must go out on bid. If payment is under \$10,000, a University requisition will suffice.

#### **5.1.23 Overload Payments from Grants for University Personnel**

Faculty employed at Alabama A&M University and paid with federal grant funds are not considered federal employees, but Alabama A&M University employees; therefore, the use of project funds for the payment of fees for additional pay (from within the grantee organization) is allowable under the conditions indicated below:

- a. There must be evidence that the services to be provided are essential and cannot be provided by persons receiving salary support under the grant.
- b. There must be evidence that a selection process has been employed to secure the most qualified person available and that the selection has been approved by a senior officer of the University.
- c. There must be evidence that the charge is appropriate considering the qualifications of the employee, his/her normal charges, and the nature of the service rendered.

- d. If overload payment is sought for an employee of the University, the service must be across departmental lines and in addition to regular duties, or it must involve a separate or remote operation, and the work performed be in addition to the employee's regular workload and specifically approved in writing by the sponsoring agency.

#### **5.1.24 Stipends**

Stipends are payment to individuals, fellows, or trainees under fellowships or training grants. Such payments are intended to provide for the individual's living expenses during the period of training.

Student stipends cannot be charged to sponsored projects unless they are specifically provided for in a written authorization from the sponsor. Students receiving stipends are not eligible for fringe benefits.

#### **5.1.25 Impact of Release Time on Cost Sharing**

All personnel working on sponsored projects may be relieved of their regular duties by the department head or other responsible persons for that period of time and percentage of effort to be devoted to the sponsored project. If such personnel continue to be paid from departmental funds while working on a sponsored project, then that portion of their salary and fringe benefits related to the sponsored project effort represents cost-sharing to the project. Alternatively, if regular personnel are appointed to and paid from the sponsored project budgetary account on which they work, then departmental (University) budget money will be released. These State funds can then be used for other purposes within the University (subject to the approval of the department head and dean and in conformity with University policy. The principal investigator may request of the department head and/or dean to use these State funds for project related costs.

#### **5.1.26 Expenditure of Project Funds**

##### *5.1.26.1 Purchasing Supplies and Equipment*

The Purchasing Department is responsible for obtaining all goods and services from outside the University. The responsibility of the Purchasing Department encompasses the obligation to obtain quality merchandise/service by the date required at the lowest possible cost to the University. Procurement of goods and services from sources outside the University by individuals or entities other than the Purchasing Department is not authorized. The Purchasing Department may determine the selection of the vendor from whom the merchandise or service will be ordered. The specifications or model requested by the principal investigator will not be changed without prior approval.

A Requisition Form is used to procure goods or services from external vendors, as well as for various on-campus services. All requisitions for purchases over the amount of \$1,000 should be forwarded to the Purchasing via the Office of Office of Sponsored Programs (OSP) which will verify the allowability of the item(s) requested.

#### 5.1.26.2 *Competitive Bids*

To obtain the best possible price, competitive formal bids are solicited when appropriate. Competitive formal bids are normally required for all requisitions (except sole source) that exceed \$7,500.

#### 5.1.27 **Travel**

Generally, it is the University's policy that travel on sponsored projects should conform to the same rules and regulations as those applicable on non-sponsored projects. Travel costs are chargeable to a sponsored project if the trip is directly related and beneficial to the specific work funded under the sponsored agreement.

##### Permission to Travel

- A Travel Authorization Request form must be completed in advance of any official travel.
- All official travel must be approved by the traveler's supervisor.
- All travel for liaison or contract activity with federal or state agencies must be approved by the Associate Provost, Dean of Graduate Studies for Office of Sponsored Programs (OSP).
- Travel in excess of thirty (30) continuous working days requires Presidential approval.
- Although travelers with budgetary authority may sign as budget managers on their own travel, no travelers may sign as their own supervisors. Therefore, the approval of the principal investigator's department head or dean is required for the principal investigator's own travel.
- The Travel Authorization Request form and the subsequent Travel Reimbursement Request form should clearly indicate the meeting or purpose of the trip and expected benefits to the sponsored project to which it will be charged.

##### Travel Reimbursement

Travelers on sponsored projects are subject to the same rules and regulations as are travelers on other budgets. Hence, travelers should become familiar with the existent University travel procedures.

#### 5.1.28 **Property Control**

The title for all equipment that is purchased with contract or grant funds is vested with the granting agency. Upon completion of the project, the principal investigator, in the name of the University, may request that the title be turned over to the institution. All such requests for property title transfer are to be processed and coordinated through the OSP.

If the title is turned over to the University, the dean of the school/program is then in control of that property on behalf of Alabama A&M University. If the title is to remain with the federal agency, a U.S. government decal should be attached to the equipment.

An equipment inventory is maintained by the Office of Property Management.

## **5.1.29 Financial Management**

### *5.1.29.1 Cost-Sharing*

In most instances, when requesting federal, State or other external funding, the University must demonstrate commitment to the proposed program. The commitment is to be proven in certain programs by matching funds. Each academic unit determines the importance of possible externally supported programs according to the priorities of the school or program in its respective academic development plan. Based upon this, the school or program decides if the cost sharing required by the agency can be committed or identified within existing budgets. This cost-sharing in funding and/or in-kind must be audible. It is recommended that salaries with the pertinent fringe benefits and assessments be used as the primary type of cost sharing, however, other budgetary commitments may be approved on an individual case basis. For example, anticipated project equipment, travel, supply, or facilities usage expenditures in excess to those normally covered by Indirect Charges (normal operating overhead) may qualify upon approval as in-kind cost-sharing.

### *5.1.29.2 Budget Transfers*

If a budget change is required on an on-going contract or grant, a Request for Transfer of Funds Form is necessary. Upon submission, a review of the project will be made by an Administrator within the of Office of Sponsored Programs (OSP) determine whether agency approval is required.

Prior approval is normally required for the following:

- Subcontracts or subgrants
- Changes in scope or objectives
- Changes in key personnel
- Transferring substantive programmatic work to a third party
- Medical care to individuals under research grants
- General purpose equipment
- Large transfers of monies from one category to another
- Foreign travel

Items that are NOT allowed on contracts and grants are:

- Contingency funds
- Entertainment costs
- Fundraising, solicitation of gifts
- Losses on other research agreements or contracts
- Lobbying

### **5.1.30 Final Reports**

The OSP will send notification to the P.I. 90 days before expiration of the grant as a reminder of closeout procedures. A copy of this notification is also forwarded to the dean/director, Human Resources, Property Management, and Comptroller's Office. To ensure that the University receives its final payment and that sponsor requirements are met, the following procedures should be followed:

Final Report of Expenditures: The Grants and Contracts Accountant in the Office of the Comptroller is responsible for compiling the Final Report of Expenditures and sending a copy to the principal investigator.

Technical Reports: It is the responsibility of the Principal Investigator to ensure that all technical and other reports (e.g., invention reports and property and classified reports) are delivered in a timely manner and in the format agreed upon with the sponsor.

### **5.1.31 Project Close-out**

#### *5.1.31.1 University Support Personnel Positions*

The Office of Human Resources should be notified at least ninety (90) days prior to the grant ending date of any University support personnel positions for which funding will not be continued. This notification, which is the principal investigator's responsibility, should include the individual's name, job classification, current position location, and date of termination of the current program funding, and should be processed through the dean's/director's office. The Office of Human Resources will assist in placing clerical staff in another position on campus, but needs sufficient lead time to do so.

#### *5.1.31.2 Personnel Action Forms*

Forms should be completed and processed through the dean's/director's office to terminate support personnel services.

#### *5.1.31.3 Use of Vacation Leave*

Project staff are encouraged to use accrued annual leave before the ending date of the grant.

#### *5.1.31.4 Telephone*

If your project has its own telephone lines, notify the Telecommunications Office at least a month in advance of the date on which the telephone service is to be discontinued. Also, suggest where project calls should be forwarded, and provide this information to both Telecommunications and the dean's/director's office.

#### *5.1.31.5 Furniture/Equipment/Books*

If your project has purchased furniture, equipment (e.g., computer, iPad, etc.), books, etc., provide an inventory of this equipment, including the Alabama A&M property tag

number, to the dean's/director's office. Distribution of the furniture and equipment, within or outside of the unit, will be done by the dean's/director's office.

#### **5.1.31.6** *Leased Furniture/Equipment*

If your project leases office furniture or equipment, arrange with Purchasing for the pick-up of the leased items on or about the time of project closeout.

#### **5.1.31.7** *Keys*

Collect University keys from all project staff and return them. Note: Appropriate deans and department chairpersons are to maintain key control for all labs and offices.

#### **5.1.31.8** *Project Files*

Review all project files. Budgetary and personnel information should be forwarded to the dean's/director's office for storage. All project files should be retained for three years because of the possibility of audit.

#### **5.1.31.9** *Budget Close-out*

The most recent budget printout available from the Comptrollers Office should be reviewed by the project officers to ensure that all charges are reflected in the printout and that funds are not over expended. During the last two weeks of the budget period, the project director should meet with the Grants and Contracts accountant to review the budget.

#### **5.1.31.10** *Final Report*

The final report required by the funding agency should be completed and submitted and copies forwarded to the deans/director's office and Office of Office of Sponsored Programs (OSP).

#### **5.1.31.11** *Project Close-out Checklist*

- ⇒ Office of Human Resources notified of University supporting personnel position terminations
- ⇒ Complete Personnel Action Forms to terminate these employees
- ⇒ Use remaining vacation leave
- ⇒ Telecommunications notified to stop telephone service
- ⇒ Dean's/director's office notified of furniture and equipment to be transferred
- ⇒ Return of leased equipment arranged
- ⇒ Mailroom notified of forwarding address
- ⇒ Keys returned
- ⇒ Files reviewed and stored
- ⇒ Budget closed-out
- ⇒ Final report submitted to funding agency with copies to dean/director and OSP

## 5.2 Sub-Recipient Award Procedures and Guidelines

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.

### 5.2.1.1 Roles & Responsibilities

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.

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.

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 monitoring and guidance in interpreting applicable regulations and sub-recipient award terms and conditions, and in interpreting and executing these Guidelines.

### 5.2.2 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](http://www.omb.gov)) must be performed. All sub-recipients will be cross referenced in the Excluded Parties List System (EPLS) at [www.sam.gov](http://www.sam.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 [www.sam.gov](http://www.sam.gov). If the sub-recipient organization is not listed in the EPLS system, AAMU will issue a sub-award 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 award will be issued. As a part of the required sub-recipient monitoring, all Sub-Recipients will be required to complete annual sub-recipient monitoring form as well as provide the 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.

### 5.2.3 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:

- a. The routine receipt and review of technical performance reports
- b. The routine review of expenses-to-budget
- c. The periodic performance of on-site visits or regular contact, if necessary
- d. The option to perform "audits," if necessary
- e. 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
- f. The review of corrective actions cited by sub-recipients in response to their audit findings
- g. Sanctioning sub-recipients in cases of their continued inability or unwillingness to permit monitoring activities, to have required audits and/or to correct non-compliant 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.

### 5.2.4 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:

- a. 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.
- b. 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.



- c. 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.
- d. 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.
- e. 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.
- f. Location. Sub-recipients who are geographically remote from AAMU may require more monitoring and oversight.
- g. 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.
- h. 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.
- i. 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.

### **5.2.5 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:

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.

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.

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.

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.

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.

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

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.

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.

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.

#### **5.2.7 Sub-recipient Contract Language Advice**

All sub-award agreements under federal government primary contracts and grants should contain language, substantially as set forth below, requiring sub-award agreementors 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.** Sub-award agreementor agrees to comply with the requirements of OMB Circular A-133. Sub-award agreementor 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 Sub-award agreementor 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.

## 6 GCA Cost Policies

### 6.1 Cost Allocation Guide

#### 6.1.1 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.

2 CFR Part 220 (OMB Circular A-21) provides two methods for allocation of an allowable direct cost to two or more grants, proportional and interrelationship, which are further described below.

##### 6.1.1.1 *Proportional Benefit*

If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects.

*Example: A PI has two awards which require the purchase of mice to conduct experiments. The Specific Aims for one award indicates 150 mice are needed to conduct the research and the Specific Aims of the second award requires 50 mice to conduct the research. The PI orders 200 mice and allocates the cost of the mice 75%/25% between the awards.*

In order to determine the proportional benefit, the initiator of the transaction (Principal Investigator (PI)/Co-PI/authorized designee) must have first-hand knowledge that the goods or services are reasonable, are appropriate to be charged to the accounts, and are allowable according to University and applicable sponsor policies.

- If a preparer is processing a request on behalf of the initiator, they must have received the appropriate proportional allocation instructions from the initiator in order to execute the purchase. Documentation may be in the form of an email, fax, or departmental request form, etc.
- Since direct benefit to the project(s) is being determined by the initiator and allocated in proportion to the benefit received by the awards, detailed documentation supporting the calculation of proportions is not required to execute the transaction.

### 6.1.1.2 *Interrelationship Benefit*

If a cost benefits two or more projects or activities in proportions that cannot be easily determined due to the interrelationship of the work involved, then the cost may be allocated to the benefiting projects on any reasonable basis.

*Example: Acetone purchased for use in a laboratory is needed for the technicians working concurrently on three research projects. A reasonable method of allocating the cost of the Acetone could be based on the number of FTEs.*

## 6.1.2 **Developing an Interrelationship Allocation Methodology**

When costs cannot be easily allocated and determined due to the interrelationship of work involved, it may be necessary to determine a method for allocating costs that supports a reasonable distribution across multiple awards. The basis for allocating a cost among awards should logically relate to the type of expense incurred. For example, it would be appropriate to allocate lab supplies based on the proportion of effort devoted to each award (measured as Full Time Equivalents or FTE's), whereas rent expense may be more appropriately allocated based on the square footage of lab space occupied by each award rather than FTEs in the space. The methodology chosen should produce an allocation of costs to each sponsored award that **reasonably** reflects the benefit received by each award.

- Some examples of methodologies that could be used as a basis for allocating costs include: Effort of research personnel (FTEs)
- Laboratory space (square footage)
- Number of experiments or procedures performed
- Actual usage records for a representative sample (e.g., one week, one experiment cycle, etc.) Modified Total Direct Costs (excluding subawards entirely) budget of benefiting sponsored projects

Different allocation methodologies may be required for different types of costs. When developing an interrelationship allocation methodology, it is important that the basis for the allocation method be: documented contemporaneously with the cost being incurred and allocated; and approved in advance by the Principal Investigator(s) or initiator of the awards to which the costs are allocated.

### 6.1.2.1 *System Restrictions*

Occasionally, it may not be possible to allocate costs to the benefiting sponsored awards at the time the goods or services are purchased. Such costs must be recorded in a non-sponsored award (e.g., a Unrestricted or Institutional account). "Parking" costs on a sponsored award with the intention of later allocating some or all of the costs to other awards is a violation of federal regulations and is therefore prohibited.

Note: If costs are initially recorded on a non-sponsored award, the eventual distribution of these costs to sponsored awards is a cost transfer that must comply with the University's Cost Transfer policy and procedure.

### 6.1.2.2 *Allocation methodology "Do's and Don'ts"*

**Don't** use allocation methodologies that result in an over- or under-recovery of expense. An over-recovery of expense may result in a refund to the sponsor. An under-recovery may need to be funded by the department.

**Don't** use any allocation methodology that is based on the funds available on sponsored awards.

**Do** ensure that the interrelationship allocation methodologies are documented contemporaneously with the cost being incurred and allocated.

**Do** document how measures such as FTE or square footage logically relate to the cost being allocated and the benefit received by the awards.

**Do** retain the supporting documentation in the department so it is available for review and audit.

**Do** review allocation methodologies periodically to ensure they are reasonable. Significant changes to the population may signal the need to review the allocation methodology. Also, allocations based on FTE's must be updated to reflect any changes in FTE's or effort.

Methodologies based on sampling, surveys, etc., should be reviewed, updated and approved by the PI at least once each fiscal year and/or when new awards are received and awards expire.

**Do** identify the allocation method that will be used in advance of purchasing or at the time of ordering the goods/services whenever possible (to avoid the need for cost transfers).

**Don't** allocate costs after-the-fact by use of cost transfers.

## 6.2 Cost Transfer Policy

### 6.2.1 Scope

This document sets forth Alabama A&M University's policy regarding cost transfers, including transfer of payroll and other direct costs associated with sponsored projects.

### 6.2.2 Purpose of the Policy

This policy is issued to assure the correctness of the University's charges transferred to and/or from a sponsored project after an initial charge elsewhere in the University's accounting system. Additionally, this policy is issued to ensure compliance with sponsor terms and conditions, regulations, and University policies.

### 6.2.3 Policy Statement

The University is committed to ensuring that all cost transfers are legitimate and are conducted in accordance with sponsor terms and conditions, regulations, and University policy.

All Principle Investigators (PI's) are responsible for ensuring that the transfer of costs to (or between) sponsored projects which represent corrections of error are made promptly.

Cost transfers must be supported by documentation which contains a full explanation of how the error occurred and a correlation of the charge to the project to which the transfer is being made. Explanations such as "to correct an error" or "to transfer to the correct project" are unacceptable.

Transfers of costs to any sponsored project are allowable only where there is a direct benefit to the project being charged. An overdraft or any direct cost item incurred in the conduct of one sponsored project may not be transferred to another sponsored project merely for the sake of resolving a deficit or an allowability issue. Cost transfers should **not** be used as a means of managing awards.

Cost transfers must be prepared and submitted within 90 days of the end of the calendar month in which the transaction posts as an expense to an award, except in cases where the sponsor's terms and conditions are stricter than University policy. Any cost transfers submitted after 90 days require Grants & Contracts Accounting Director review and approval, and will be granted only under extenuating circumstances and confirmation of approval by the sponsor, when applicable.

**Note: Cost transfers to correct an error must be completed regardless of timeframe if the correction benefits the sponsor.**

The University expects that costs directly charged to federally sponsored awards received by the University will comply with the cost principles outlined in 2 CFR Part 220 (OMB Circular A-21).

#### **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

**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:

- Allowable – the cost is allowed by federal regulations, sponsor terms and conditions, including program specific requirements and University policy;
- Reasonable – reflects whether or not the individuals concerned acted with due prudence in the circumstances;
- Allocable – the cost has a direct benefit to the account being charged; and
- 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.

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.

**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.

**Cost Transfer Approval.** The Office of Sponsored Programs is required to review and approve all cost transfers submitted where expenses are being transferred from a University project or a sponsored project to another sponsored project. After approval is received from OSP, the GCA office has the authority to post cost transfers to the University's financial system. Any cost transfer not meeting the requirements of this policy will be rejected.

## 6.3 Cost Transfer Procedure

### 6.3.1 Cost Transfer Procedure – General Information Scope

This document sets forth Alabama A&M University's procedures regarding cost transfers, including transfer of payroll and other direct costs associated with sponsored projects.

#### Purpose

In accordance with Alabama A&M University's Cost Transfer Policy, this procedure will:

Assure the integrity of the University's charges for salaries, goods, and services on sponsored

projects that are transferred to or from a sponsored project after an initial charge elsewhere in the University's accounting system; and

Ensure compliance with sponsor terms and conditions, regulations, and University policies.

#### 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.

#### Cost Transfer Requestor

A cost transfer may be prepared by any University employee; however, the request to transfer a cost to or from a sponsored project must receive the approval of the PI responsible for the sponsored project receiving the charge **prior** to the cost transfer being processed.

#### Cost Transfer Procedure – Process Initiating a Cost Transfer

**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. Only an individual with first-hand knowledge may officially request the cost transfer of an expenditure to or from a sponsored project.

Note: A cost transfer cannot be requested and processed by the same individual.

#### Cost Transfer Preparation

A cost transfer may be requested by the following individuals: a sponsored project Principal Investigator (PI), a department business manager, or other departmental staff. The requestor must provide the following information:

FOAP where the expense originally charged.

FOAP where the expense **should** have charged.

Completed Cost Transfer Justification Form, from the PI or sponsored project business manager.

Note: An email including the appropriate documentation for the cost transfer is generally acceptable.

If the cost transfer request is for salaries or wages, the University employee's name must be provided, along with the time period (or pay period) and amount of effort/salary affected. *Note: If an effort report has been completed, a copy of the individual's certified effort report must be included.*

If the cost transfer request is for other direct costs, the invoice number or purchase order number must be provided.

A written explanation for the error, including a justification of how the cost benefits the sponsored project it is being transferred to, if applicable.

If the cost transfer request is beyond the 90 day time limit, an explanation must be provided justifying why the request was delayed and how the error will be prevented for future transactions.

### **Cost Transfer Questions**

Prior to submission of a cost transfer request, the request should be evaluated by the requestor and the following questions should be answered.

Is the cost:

Allowable under 2 CFR Part 220 (OMB Circular A-21) and/or the terms and conditions of the

sponsored project and related University policies?

Allocable to the sponsored project that will now be charged?

Reasonable and necessary to meet the aims/goals of the sponsored project to be charged?

Within the budget period of the sponsored project to be charged?

Consistently treated in relation to other sponsored projects?

Note: For a cost transfer request to be approved by OSP, the answer to all of the above questions must be **yes**.

The requestor should then ask the following additional question:

Are the identified costs being transferred in order to cover an apparent cost overrun on another sponsored project?

Note: For a cost transfer request to be approved by OSP, the answer to this question must be **no**.

### **Grants & Contracts Accounting Document Review**

Once received by the Grants & Contracts Accounting department, all documentation should be reviewed for completeness. If all required documents/information have been supplied, and all questions above in "Cost Transfer Questions" have been answered satisfactorily, a Journal Voucher (JV) should be prepared to transfer the cost. If documentation/information is incomplete, the cost transfer request should be returned to the department. If the questions above have **not** been answered satisfactorily, the cost transfer request should be forwarded to the Office of Sponsored Programs for a compliance review and approval.

## **JV Processing and Approval**

A JV detail sheet and a JV cover sheet should be prepared in accordance with University policy detailing out the cost transfer to be performed. The following documents should be attached to the JV as supporting documentation, based on the type of cost being transferred.

The signed Cost Transfer Justification Form for all cost transfers.

Any supporting documentation provided by the department with the cost transfer request for all cost transfers.

A copy of the certified effort report for labor cost transfers where an effort report has already been completed (optional, not required)

A printout of NHIDIST (or an export of) detailing out the salary expenditures for labor cost transfers.

A printout of FGIBDST and a drilldown of FGIBDST (or an export of) detailing out the cost for all cost transfers.

If the cost transfer required a compliance review by the Office of Sponsored Programs, a written, signed approval to proceed.

JV should be entered into Banner in accordance with University policy.

Cost transfer JV's will be approved by the Director of Grants & Contracts Accounting only if all required documentation has been completed. In the absence of the Director, cost transfer JV's may be approved

by the Assistant Vice President of Business & Finance. All JV forms and supporting documentation should be retained in accordance with the University's record retention policy.

## **6.4 GCA FINANCIAL REPORTING POLICY**

### **Scope and Purpose**

This policy applies to all sponsored awards received by Alabama A&M University and informs the Alabama A&M community of its compliance obligations to sponsors regarding its reporting requirements for both interim and final financial reporting.

### **Policy Statement**

Alabama A&M University shall submit financial reports to its sponsors supporting research and other scholarly activities that:

Accurately reflect the use of sponsored funds as recorded in the financial records of the University; and

Are in compliance with the sponsor's terms and conditions.

Achieving compliance with this policy is a shared responsibility involving the Principal Investigator's (PI), departmental business office, the Office of Sponsored Programs (OSP), and the office of Grants and Contracts Accounting (GCA).

## Definitions

**Financial Report** - A financial report [e.g., Financial Status Report (FSR), invoice, etc.] is an accounting of expenditures and obligations incurred during the period of performance and/or at the conclusion of the sponsored project. The financial report reflects the University's official accounting records.

**Financial Closeout** - The process at the end of a sponsored award by which the University completes any required accounting to the sponsor and prevents any further expenses from being incurred on the award.

## Financial Reporting

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.

## Final Financial Reporting

Except in unusual circumstances approved by the Director of GCA, the University will not file final financial reports which indicate unliquidated obligations or commitments. Any unique circumstance that may require a final financial report to be filed with unliquidated obligations or commitments must be approved in advance by GCA.

## Closing Sponsored Accounts

At the conclusion of the award, after the financial report is filed with the sponsor, and all financial obligations satisfied, GCA is responsible for changing the award status in the University's financial system to "Inactive". Once an award status is changed to "Inactive", no further financial activity can occur. GCA provides the award owning department, and OSP, with a copy of the signed and submitted final financial report for appropriate record retention purposes.

## **7 APPENDICES**

**7.1 Appendix A. Office of Sponsored Programs Overview**

**7.2 Appendix B. Pre-and Post-Award Forms**

**7.3 Appendix C. Research Compliance Manual**

**7.4 Appendix D. Patent and Copyright**

**7.5 Appendix E. Office of Grants and Contracts Accounting Overview**

# **APPENDIX A**

## **Office of Sponsored Programs (OSP) Overview**

**A.** OSP Mission Statement

**B.** OSP Goals

**C.** Strategies to Achieve Goals

**D.** Sponsored Programs Staff

**E.** Organizational Structure

**F.** OSP Organizational Chart

**G.** Staff Duties and Responsibilities

- 1.** Executive Director
- 2.** Administrative Assistant
- 3.** Compliance Officer
- 4.** Grants Administrator/Pre Awards
- 5.** Grants and Contracts Coordinator I/Pre Awards
- 6.** Grants and Contracts Coordinator I/Post Awards
- 7.** Grants and Contracts Coordinator II/Post Awards

**H.** Proposal Submission Process

**I.** Proposal Submission Process Flowchart

**J.** Award Process

**K.** Award Process Flow Chart

## **A. 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.

## **B. OFFICE OF SPONSORED PROGRAMS (OSP) GOALS**

OSP goals are:

1. Increase all OSP staff understanding of principles of sponsored project administration;
2. Develop a team work environment;
3. Reduce the administrative burden placed on PI's in applying and administering contracts and grants;
4. Increase the number of proposals submitted per College each Fiscal Year; and
5. Increase the number of awards per College.

## **C. STRATEGIES TO ACHIEVE GOALS**

The above goals will be achieved by the implementation of the below listed strategies:

- Each grants administrator will work with a college to ensure that faculty in each college is engaged in writing a grant during the year.
- Each grants administrator will attend a proposal building/development workshop in an effort to hone their skills in grant writing.
- The Capabilities Assessment Statement (CAS) will be updated and will serve as “a boiler plate” for faculty members involved in grant writing.
- Faculty capabilities will be placed on file in OSP.
- The number of faculty writing grants will increase in each college.
- Update and design the OSP website in a way that it will enhance faculty to write proposals. The website will also feature announcements, OSP newsletters and other resources, etc.
- The OSP staff will meet with the Deans to discuss the office's new organizational structure, and OSP procedures.
- Each grants administrator will work closely with the Dean.



- Workshops will be conducted at least once every semester via on site presentations and webinars.
- Grant administrators will also assist each as needed other according to his/her area of expertise.
- One-on one-consultation as deemed necessary and/or when requested.

## **D. OFFICE OF SPONSORED PROGRAMS STAFF**

*Executive Director*

*Administrative Assistant*

*Compliance Officer*

*Pre/Post Award Grant Administrators\**

*Post-Award Specialist\**

*Grant Writer/Proposal Developer\**

\*The titles above include the responsibilities and qualifications of the positions described in the staff responsibilities and duties in Section G of this appendix for the positions listed below, but more accurately describe the actual division of responsibilities and duties for the staff in the Office of Sponsored Programs .

*(Grants Administrator / Pre Awards)*

*(Grants and Contracts Coordinator I / Pre Awards)*

*(Grants and Contracts Coordinator I / Post Awards)*

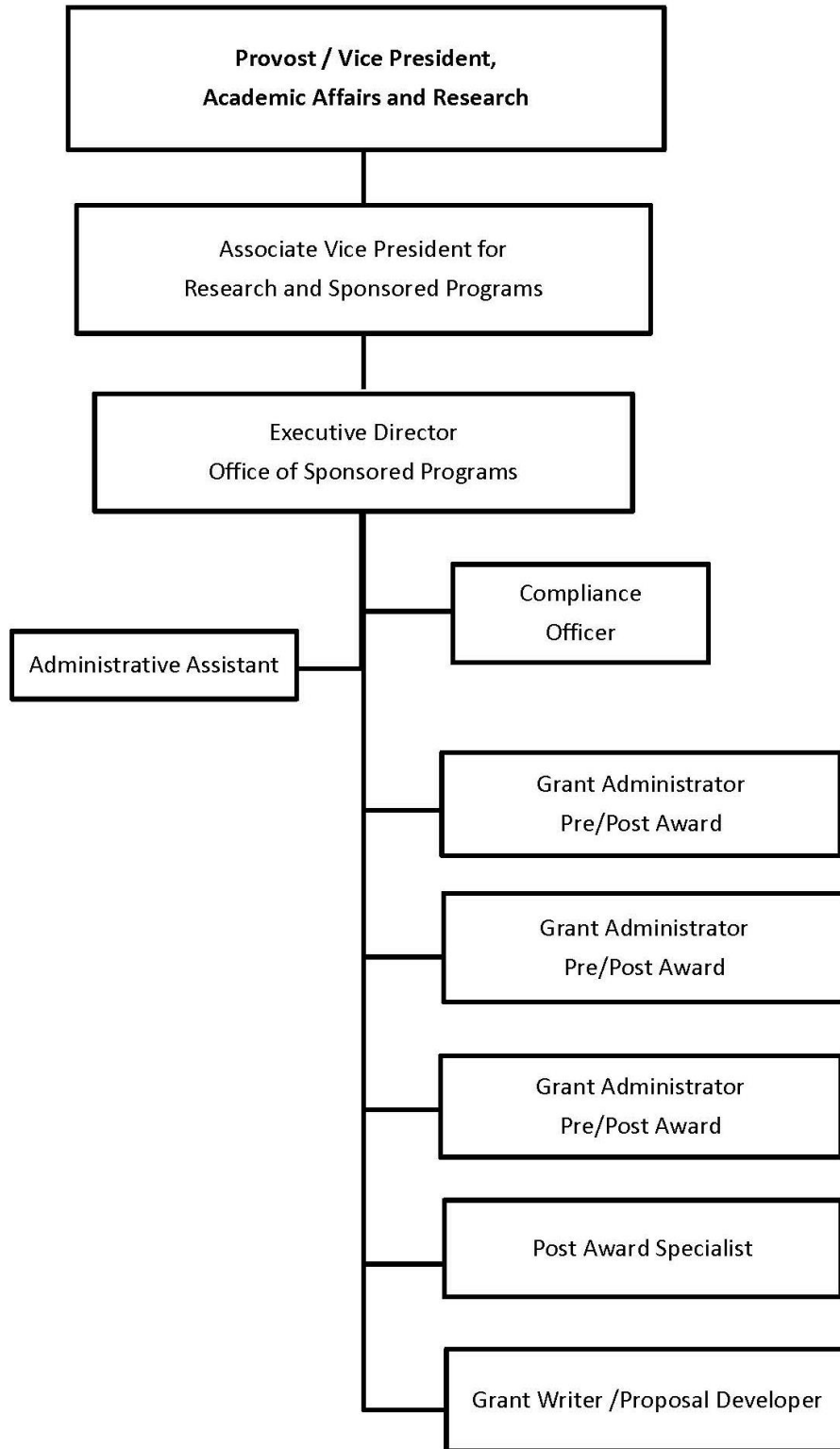
*(Grants and Contracts Coordinator II / Post Awards)*

## **E. ORGANIZATIONAL STRUCTURE**

Sponsored Program activities are managed under the Office of Sponsored Programs (OSP), and Grants and Contract Accounting (GCA). The OSP staff consists of the executive director, an administrative assistant, the compliance officer, three pre-/post-award grant administrators, a post-award specialist who processes all encumbrances and requisitions, and a grant writer/proposal developer. The OSP organization chart titles reflect the functional positions that operate in OSP and the reporting structure.

## **F. ORGANIZATIONAL CHART**

### **Alabama A&M University Office of Sponsored Programs Organization Chart**



## **G. STAFF DUTIES AND RESPONSIBILITIES**

### **Executive Director of Sponsored Programs**

Fair Labor Standards Act (FLSA) Classification: Exempt  
Grade: Unclassified

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

#### **Summary:**

The position encourages and supports university faculty in their pursuit of external grant support for research programs, scholarly activities, student research awards, program services, and equipment purchases. The Director oversees university-wide initiatives to improve external funding success and helps to identify and secure collaborative partners for specific funding requests.

The position will provide oversight and supervision of a comprehensive program of institutional research. Responsible for maintaining a quality assurance program. Additionally, the position acts as a liaison to colleges and departments in project/program development; dissemination of information on potential funding sources; assistance in proposal preparation and submission; negotiation of grants and contracts, research compliance and assistance in project monitoring and reporting.

#### **Duties and Responsibilities:**

- Encourage and support faculty in the pursuit of external grant and contract support for sponsored programs.
- Oversee university-wide initiatives to improve external funding success.
- Identify and secure collaborative partners for specific funding requests.
- Provide for the pre- and post-award processes.
- Work closely with Academic Deans and Center Directors to assist faculty in their research, scholarship, and grant-writing activities.
- Supervise a staff of coordinators and grant writers.
- Advise grant writers so as to ensure: (1) that proposals are of the highest quality, and (2) that all final proposals conform to sponsor criteria.
- Maintain oversight over successful grant and contract applications to ensure that the funding sources guidelines, policies, and required reporting procedures are followed by the university.
- Establish relationships with state and local governmental agencies
- Work with community and local organizations to promote ongoing partnership
- Seclude workshops, webinars as needed

#### **Minimum Position Requirements (including certifications, licenses, etc.):**

- Master's degree (Doctorate preferred).
- Three (3) years of experience with sponsored programs and assessment.

**Knowledge, Skills, and Abilities:**

- Excellent analytical and communication skills.
- Excellent, organizational, supervisory, and interpersonal skills.
- Demonstrated ability to independently conceive, design and conduct research using statistical techniques.
- Ability to prepare effective reports on results of research.
- Demonstrated ability to work effectively with multiple constituents including faculty, staff, students, alumni, the public, governmental agencies, and the corporate and foundation community.
- Ability to provide effective leadership to internal and external constituents.
- Knowledge of federal regulations, public and private contracting, and job specific processes.

**Administrative Assistant**

Fair Labor Standards Act (FLSA) Classification: Non-Exempt Grade: 15

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Summary:**

Performs and/or oversees a variety of associated administrative, fiscal, staff support, and planning activities, some of which require advanced or specialized knowledge and skills, such as budget administration and control, equipment, facilities, and inventory management, specialized recordkeeping and database management, and/or specified information-gathering projects and tasks. Coordinates and facilitates meetings, program functions, and/or special events, as appropriate. Trains and oversees lower graded staff and/or students. May coordinate specified administrative activities and reporting across multiple organizational units within a department.

**Essential Duties and Responsibilities:**

- Oversees and/or performs a range of diverse administrative activities for the department or organizational unit; serves as a central point of liaison with other departments and external constituencies in the resolution of a variety of day-to-day matters concerning the unit.
- Utilizes knowledge and understanding of underlying operational issues to create, compose, and edit technical and/or administrative correspondence and documentation.
- Assists in administrative problem solving, program/project planning, development, and execution of stated goals and objectives.
- Researches information, compiles statistics, and gathers and computes various data; prepares special and/or one-time reports, summaries, or replies to inquiries, selecting relevant data from a variety of sources.
- Monitors, reconciles, and assists with fiscal administration for the unit, including but not limited to budgets, funding, grants, contracts, payroll, employment, travel, and/or purchasing; may assist with fiscal planning, including participating in seeking alternate sources of funding.

- Provides and/or oversees support activities for the unit such as answering telephones, assisting and resolving problems and inquiries of visitors, review and control of incoming and outgoing correspondence, and follow-up on operational commitments.
- Provides administrative assistance with faculty and/or staff searches, as appropriate, to include logging employment applications; preparing applicant acknowledgments and interview documents, coordinating interview logistics, and coordinating search documentation.
- Schedules appointments and maintains calendars; schedules, coordinates and facilitates meetings, facilities usage, events, and/or travel arrangements, as required.
- Establishes, updates, and maintains unit's files, inventories, and records; implements and maintains data management systems, as required.
- Leads and guides the work of lower level staff, and supervises student employees as appropriate; may participate in hiring decisions and performance appraisal.
- Performs miscellaneous job-related duties as assigned.

**Minimum Position Requirements (including certifications, licenses, etc.):**

- Bachelor's degree in office administration or related area
- At least three (3) years of experience that is directly related to the duties and responsibilities specified.

**Knowledge, Skills and Abilities:**

- Knowledge of computerized information systems used in financial and/or accounting applications
- Knowledge of general accounting principles
- Knowledge of human resources concepts, practices, policies, and procedures
- Skill in the use of personal computers and related software applications
- Skill in organizing resources and establishing priorities
- Demonstrated ability to maintain confidentiality
- Records maintenance skills
- Database management skills
- Ability to gather data, compile information, and prepare reports
- Ability to supervise and train assigned staff
- Ability to analyze and solve problems
- Ability to make administrative/procedural decisions and judgments
- Ability to create, compose, and edit written materials
- Ability to communicate effectively, both orally and in writing

**Compliance Officer**

Fair Labor Standards Act (FLSA) Classification:

Exempt Grade: Unclassified

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an

exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Function:** To coordinate and monitor activity that involves human subjects, health privacy, and animal care and use to ensure compliance with federally mandated regulations protecting the rights and welfare of the subjects of research.

### **Essential Duties and Responsibilities**

#### **Compliance:**

The Compliance Officer works closely with the chairs of Institutional Review Board (IRB), Human Subjects and the Institutional Animal Care and Use Committee (IACUC) to coordinate, support, and review all research involving use of human and animal subjects. Duties and responsibilities include:

- Designs, plans, and coordinates Responsible Conduct of Research (RCR) training and review programs.
- Supplies vision for building compliance infrastructure for research integrity and streamlines procedures and forms for submission and monitoring approved protocols
- Keeps up with developing research compliance needs of the University
- reviews and analyzes internal and external controls and procedures to ensure compliance with appropriate federal regulations and state and university policies for human and animal subjects protections, privacy, and conflict of interest
- Keeps records of monitoring activities makes recommendations for changes;
- Plans and facilitates meetings of the review boards; and conducts training in compliance with RCR requirements
- Attends, present, and network at national and regional research administration conferences
- Act as the central contact point for audits by regulatory agencies and provide campus liaison with such agencies
- Other assignments as required

#### **Minimum Position Requirements and Qualifications:**

Substantial experience with IRB, IACUC, Sponsored Programs, and/or other administrative office responsible for research administration. Experiences could be in a university, hospital, or research center, government organization, foundation, or other commensurate situation.

Competence, experience, and leadership to ensure the University's continued compliance, and to ensure efficient/effective support of research, teaching, and service programs. Specifically, the following is being sought:

- A masters degree or the equivalent combination of education and experience is required.
- Knowledge of compliance issues in pre-award and post-award processes is preferred.
- Demonstrated knowledge in IRB, IACUC, and/or compliance management.
- Ability to extract pertinent data and create useful reports presented in logical, clear and concise formats, taking the end-user audience into consideration.
- Experience in analyzing organizational needs, recommending innovative solutions, developing processes and implementing procedures.
- Political acumen and communication skills to interact with a diversity of individuals and teams.
- Ability to conduct strategic risk assessments and implement solutions to address critical needs
- Ability to supervise support personnel associated with the position.

- Ability to work effectively with researchers, committees, and administrators to provide program continuity on a daily basis
- Presentation and training or education development skills
- Ability to develop and communicate internal policies and procedures that comply with federal regulations and the university structure.

### **Grants Administrator (Pre Awards)**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 17

- Analyzes Request For Proposals (RFP) announcements and articulate to faculty
- Create word search lists based on faculty research interests
- Utilizes Federal, state, and private foundations portals to search for opportunities
- Prepares proposal packages and submit to agencies
- Employs working knowledge of Federal circulars
- Communicates with each agency's contact person
- Send confirmation of submittal to PIs
- Assists with planning presentation of OSP pre=award workshops
- Reviews proposal narratives, budgets and forms as required per announcement
- Coordinates and direct office services such as records and budget preparation, personnel
- Promotes and assists University externally funded R&D grants and contracts development and management
- Maintains contact with University participating scientists in matters pertaining to establishment, implementation and closeout of sponsored R&D contracts and grants.
- Reviews requisitions

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Function:** To assist with administration of Federal/State funded, research and development (R&D) grants and contracts

- Exercises independent judgment and discretion of planning, controlling, reviewing, advising, and approving to ensure terms and conditions of individual contracts and grants, public law, agency regulations, cost accounting standards, and university policies and procedures are followed
- Employs working knowledge of Federal circulars
- Communicates with each agency's contact person
- Send confirmation of submittal to PIs
- Assists with planning presentation of OSP pre=award workshops

- Reviews proposal narratives, budgets and forms as required per announcement
- Coordinates and direct office services such as records and budget preparation, personnel
- Promotes and assists University externally funded R&D grants and contracts development and management
- Works with Coordinator to ensure coordination of office services such as records and budget preparation, personnel.
- Promotes and assists University externally funded R&D grants and contracts development and management
- Demonstrated experience in managing and completing multiple concurrent projects, developing strong business relationships, and experience in grant/contract financial analysis
- Reviews requisitions and proposed budgets to ensure compliance with all Federal/State laws and regulations
- Exercises independent judgment and discretion of planning, controlling, reviewing, advising, and approving to ensure terms and conditions of individual contracts and grants,  
public law, agency regulations, cost accounting standards, and university policies and procedures are followed
- Implement and monitors subcontract awards, modifications, and expenditures to assure compliance with contractor specifications
- Manage sub recipient performance (cost, schedule, delivery and technical performance reporting)
  
- Supports University Agency and University Industry contacts, attends meetings, conferences, and consortia assemblies where appropriate
- Provide education and training to faculty, staff, and students regarding post-award matters
- Works with Business & Finance Office to ensure yearly A-133 audits are conducted
- Assist with Project Closeout requirements
- Other duties as assigned

**Minimum Position Requirements (including certifications, licenses, etc.):**

1. Bachelor’s degree in Business or related field and 3-5 years of professional experience in the field is required. Master’s Degree preferred. Working knowledge of Federal/State grants and contracts management, contract accounting, subcontract managements, and research implementation practices and procedures.
2. Strong computer skills utilizing Microsoft Office Suite of Products (Word, Excel, PowerPoint, Access).
3. Strong oral and written communication skills.

**Grants and Contracts Coordinator I (Pre Awards)**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 17



- Analyzes Request For Proposals (RFP) announcements and articulate to faculty
- Create word search lists based on faculty research interests
- Utilizes Federal, state, and private foundations portals to search for opportunities
- Prepares proposal packages and submit to agencies
- Employs working knowledge of Federal circulars
- Communicates with each agency's contact person
- Send confirmation of submittal to PIs
- Assists with planning presentation of OSP pre-award workshops
- Reviews proposal narratives, budgets and forms as required per announcement
- Coordinates and direct office services such as records and budget preparation, personnel
- Promotes and assists University externally funded R&D grants and contracts development and management
- Maintains contact with University participating scientists in matters pertaining to establishment, implementation and closeout of sponsored R&D contracts and grants.
- Reviews requisitions

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Function:** To assist with administration of Federal/State funded, research and development (R&D) grants and contracts

- Exercises independent judgment and discretion of planning, controlling, reviewing, advising, and approving to ensure terms and conditions of individual contracts and grants, public law, agency regulations, cost accounting standards, and university policies and procedures are followed
- Employs working knowledge of Federal circulars
- Communicates with each agency's contact person
- Send confirmation of submittal to PIs
- Assists with planning presentation of OSP pre-award workshops
- Reviews proposal narratives, budgets and forms as required per announcement
- Coordinates and direct office services such as records and budget preparation, personnel
- Promotes and assists University externally funded R&D grants and contracts development and management
- Works with Coordinator to ensure coordination of office services such as records and budget preparation, personnel.
- Promotes and assists University externally funded R&D grants and contracts development and management
- Demonstrated experience in managing and completing multiple concurrent

projects, developing strong business relationships, and experience in grant/contract financial analysis

- Reviews requisitions and proposed budgets to ensure compliance with all Federal/State laws and regulations
- Exercises independent judgment and discretion of planning, controlling, reviewing, advising, and approving to ensure terms and conditions of individual contracts and grants, public law, agency regulations, cost accounting standards, and university policies and procedures are followed
- Implement and monitors subcontract awards, modifications, and expenditures to assure compliance with contractor specifications
- Manage sub recipient performance (cost, schedule, delivery and technical performance reporting)
  
- Supports University Agency and University Industry contacts, attends meetings, conferences, and consortia assemblies where appropriate
- Provide education and training to faculty, staff, and students regarding post-award matters
- Works with Business & Finance Office to ensure yearly A-133 audits are conducted
- Assist with Project Closeout requirements
- Other duties as assigned

### **Minimum Position Requirements (including certifications, licenses, etc.):**

1. Bachelor's degree in Business or related field and 3-5 years of professional experience in the field is required. Master's Degree preferred. Working knowledge of Federal/State grants and contracts management, contract accounting, subcontract managements, and research implementation practices and procedures.
2. Strong computer skills utilizing Microsoft Office Suite of Products (Word, Excel, PowerPoint, Access).
3. Strong oral and written communication skills.

### **Grants and Contracts Coordinator I (Post**

**Awards)** Fair Labor Standards Act (FLSA) Classification:

Exempt Grade: 17

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Function:** To assist with administration of Federal/State funded, research and development (R&D) grants and contracts

### **Essential Duties and Responsibilities:**

## **Award**

- Supports University Agency and University Industry contacts, attends meetings, conferences, and consortia assemblies where appropriate
- Serve as the grant accounting expert and post-award compliance authority; Ensure the accuracy and integrity of all transactions by applying internal controls that comply with funding agency and college terms and policies
- Manage, develop and implement policies, processes, and systems for all aspects of the financial management of the College's Sponsored Programs
- Provide education and training to faculty, staff, and students regarding post-award matters
- Prepare all financial reports and journal entries related to grant accounts, as well as related budget adjustments, cost transfers, and account reconciliations
- Coordinates the completion of all grant-funded project tasks and goals while remaining within grant timelines and budgets
- Prepare clear and accurate interim, annual, and final performance reports containing key findings, outcomes, and conclusions of all grant projects.
- Receive time and effort reports
- Monitor budgets for research foundations, federal, state, private and local project awards
- Verifies budget conforms with sponsor requirements
- Prepare and submit reports as requested
- Coordinate close-out activities between the university and agency for each funded project
- Coordinates with Grants & Contracts Accounting (GCA) and Business & Finance offices
- Work with GCA to establish budget
- 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
- Works with GCA to monitor financial reimbursement process (from sponsor)
- Has quarterly reconciliation meetings with GCA to review drawdowns and schedule closeout preparation
- Works with Business & Finance Office to ensure yearly A-133 audits are conducted
- Assist with Project Closeout requirements
- Other duties as assigned

## **Minimum Position Requirements (including certifications, licenses, etc.):**

1. Bachelor's degree in Business or related field and 3-5 years of professional experience in the field is required. Master's Degree preferred. Working knowledge of Federal/State grants and contracts management, contract accounting, subcontract managements, and research implementation practices and procedures.
2. Strong computer skills utilizing Microsoft Office Suite of Products (Word, Excel, PowerPoint, Access).
3. Strong oral and written communication skills.

## **Grants and Contracts Coordinator II (Post Awards)**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 17

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Function:** To assist with administration of Federal/State funded, research and development (R&D) grants and contracts

### **Essential Duties and Responsibilities:**

#### **Award**

- Supports University Agency and University Industry contacts, attends meetings, conferences, and consortia assemblies where appropriate
- Serve as the grant accounting expert and post-award compliance authority; Ensure the accuracy and integrity of all transactions by applying internal controls that comply with funding agency and college terms and policies
- Manage, develop and implement policies, processes, and systems for all aspects of the financial management of the College's Sponsored Programs
- Provide education and training to faculty, staff, and students regarding post-award matters
- Prepare all financial reports and journal entries related to grant accounts, as well as related budget adjustments, cost transfers, and account reconciliations
- Coordinates the completion of all grant-funded project tasks and goals while remaining within grant timelines and budgets
- Prepare clear and accurate interim, annual, and final performance reports containing key findings, outcomes, and conclusions of all grant projects.
- Receive time and effort reports
- Monitor budgets for research foundations, federal, state, private and local project awards
- Verifies budget conforms with sponsor requirements
- Prepare and submit reports as requested
- Coordinate close-out activities between the university and agency for each funded project
- Coordinates with Grants & Contracts Accounting (GCA) and Business & Finance offices
- Work with GCA to establish budget
  
- 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
- Works with GCA to monitor financial reimbursement process (from sponsor)
- Has quarterly reconciliation meetings with GCA to review drawdowns and schedule closeout preparation
- Works with Business & Finance Office to ensure yearly A-133 audits are conducted
- Assist with
  - Project Closeout requirements
  - Other duties as assigned

## **Minimum Position Requirements (including certifications, licenses, etc.):**

1. Bachelor's degree in Business or related field and 3-5 years of professional experience in the field is required. Master's Degree preferred. Working knowledge of Federal/State grants and contracts management, contract accounting, subcontract managements, and research implementation practices and procedures.
2. Strong computer skills utilizing Microsoft Office Suite of Products (Word, Excel, PowerPoint, Access).
3. Strong oral and written communication skills.

## **Ongoing Office of Sponsored Programs (OSP) Activities**

The Office of Sponsored Programs (OSP) is established and charged with the responsibility of assisting all facets of the University with the process of sponsored programs and research. OSP provides support services to all faculty as well as assistance with proposal writing. Support services and writing assistance includes: workshops, distribution of information, reporting requirements, close out requirements, time & effort requirements, one-on-one consultation, proposal development process, and the post-award process. Each of these activities are briefly described below and on the following pages.

1. **Workshops:** OSP will conduct three major workshops per year. These include: "Before You Write" – a workshop that focuses on activities that a potential PI should engage in prior to writing (i.e. completing the Capabilities Assessment form, review of agency announcements and analyzing the announcement (RFP, NOFA, PA).
2. **Distribution of Information:** Faculty will be kept aware of funding opportunities per agency and foundations through e-mails, the OSP web site, and personal contact.
3. **One on One Consultation:** OSP will assist faculty engaged in grant writing on a one on one bases as needed. This includes, but is not limited to: completing the Request for Proposal and other funding announcements, writing the narrative, research, and completing the budget/requirements.
4. **Proposal Review:** To ensure uniformed, high quality institutional representation, each proposal must be submitted for review prior to being submitted to an agency. The review is one that is rigorous and has multi-steps. Signature authorization at the Principle Investigator, college, schools and University levels must be secured to complete the review process.
5. **IRB Review Committee:** This committee's purpose is to establish and maintain policies and procedures for the implementation of federal policy safeguarding the rights and welfare of humans involved in experimental projects and research.

## **H. PROPOSAL SUBMISSION PROCESS**

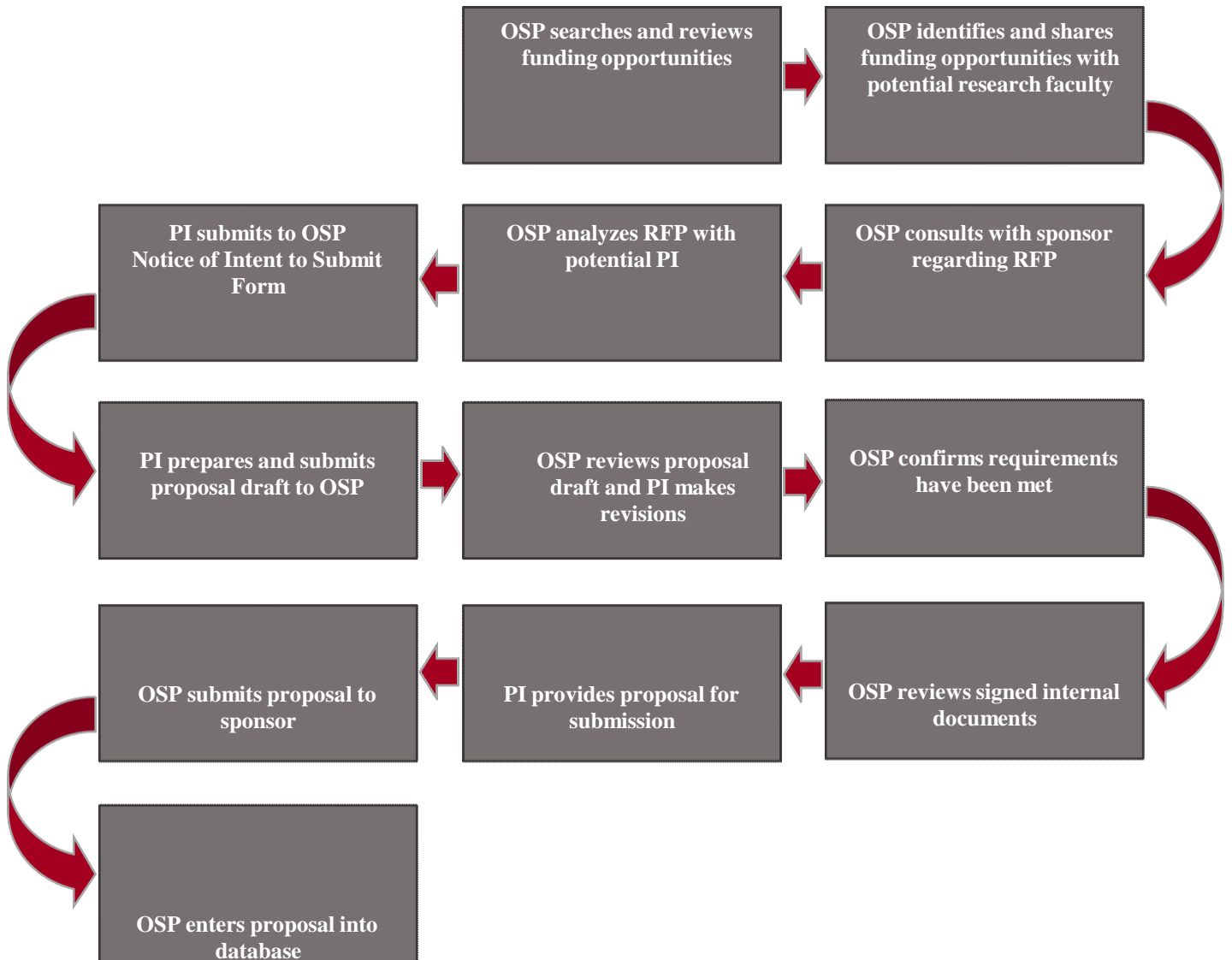
1. Reference Faculty Research Capabilities Guide (Establish Capabilities Assessment of Faculty in Research among the four colleges of the university in order to identify and match funding opportunities with faculty expertise)
2. Search and Review Funding Opportunities
  - a. OSP works alongside faculty with searching for potential funding opportunities (agency databases – (federal, state, and local entities), internet notification subscriptions, local community outreach and partnerships opportunities with peer universities
3. Identify Specific Funding Opportunities (Notify Dean and potential Research Faculty)
4. OSP has consultation with Sponsor regarding details of Request for Proposal (RFP)/Funding Opportunity
  - a. OSP shares notes obtained from sponsor consultation (if any) with Principal Investigator (PI)
  - b. Submit draft (Minimum of 10 days prior to deadline)

# I. PRE AWARD PROCESS FLOW CHART

OSP - Office of Sponsored Programs

PI - Principal Investigator

RFP - Request for Proposal



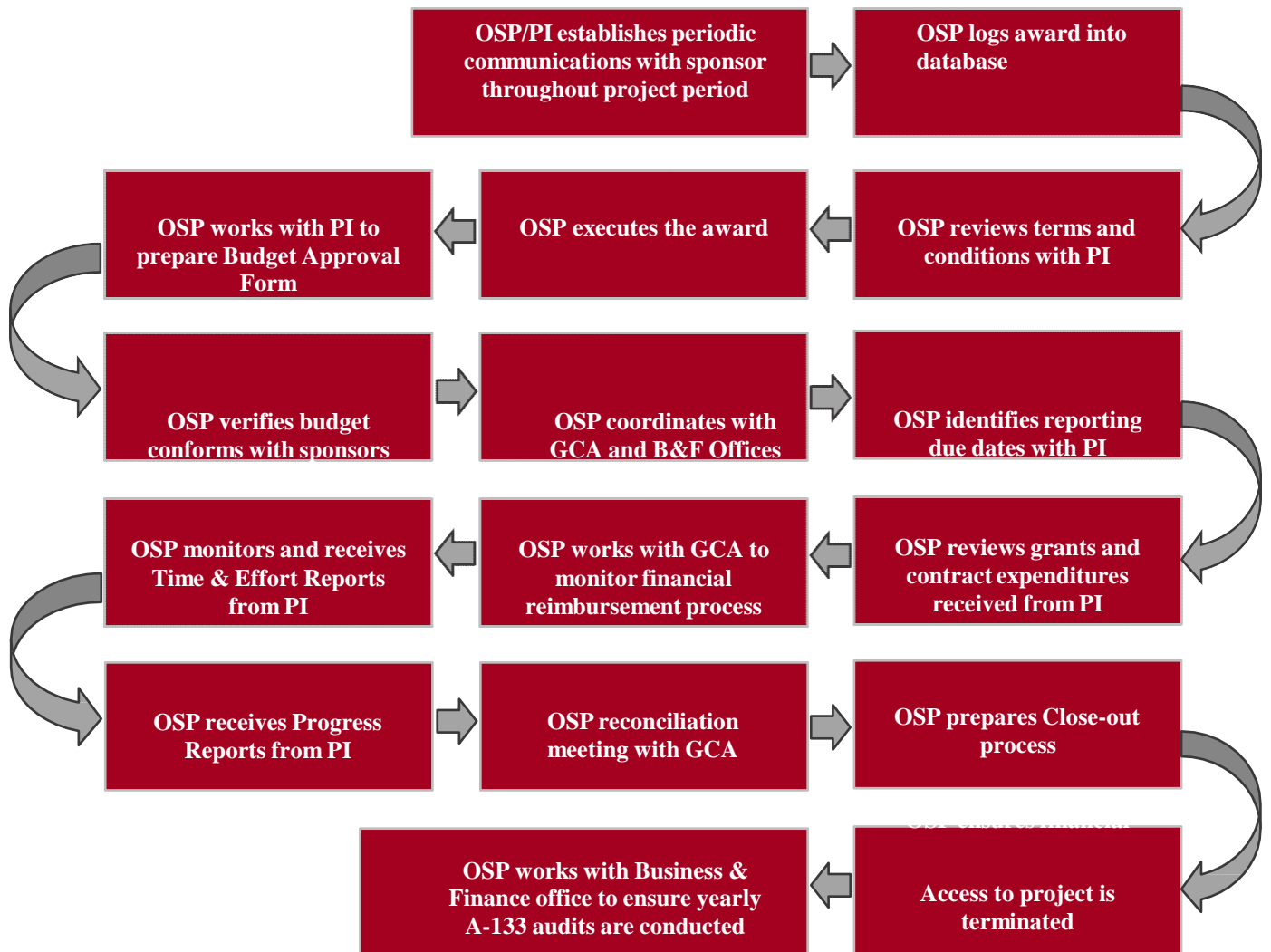
## **J. AWARD PROCESS**

1. OSP receives notification of award from sponsor
2. OSP/PI establishes periodic communications with sponsor throughout project period; logs award into database (identifies as new or incremental funding), and updates database by reclassifying previously submitted proposal as a funded award
3. OSP reviews terms and conditions with PI and negotiates contract (if required)
4. OSP executes the award by validating necessary signatures of sponsors and university representatives.
5. OSP works with PI to prepare Budget Approval Form
6. OSP verifies budget conforms with sponsor requirements
7. OSP coordinates with Grants & Contracts Accounting (GCA) and Business & Finances Offices to establish budget
8. OSP identifies reporting due dates and shares with PI (Calendar is established)
9. OSP reviews grants and contract expenditures received from PI (requisitions, encumbrances, payroll items, consultants, etc.) to be sure that each is allocable, allowable, reasonable and necessary
10. OSP works with GCA to monitor financial reimbursement process (from sponsor)
11. OSP monitors and receives Time & Effort from PI
12. OSP receives Progress Reports from PI (establish/identify prior to deadline)
13. OSP has quarterly reconciliation meetings with GCA
  - a. to review draw down schedules and close out document financials
  - b. coordinate with GCA on submission and preparation of final financials document
14. OSP coordinates close-out activities between the university and agency for each funded project)
  - a. Request/determine if cost/no cost extensions are required
  - b. Request and prepare close out reports with PI (Final Project Report, Final Financial Report, Final Property Report, Final Intellectual Report
  - c. Submit all close out documents to sponsor with exception of final financials document
  - d. Coordinates with Property Management office to review property disposition guidance per award per sponsor terms and conditions
15. Financial access to project terminated
16. OSP works with Business & Finance office to ensure yearly A-133 audits are conducted.



# K. POST AWARD PROCESS FLOW CHART

OSP - Office of Sponsored Programs  
 GCA - Grants & Contracts Accounting Office  
 B&F - Business and Finance Office  
 PI - Principal Investigator





## **Appendix B. Pre-and Post-Award Forms**

1. Notice of Intent to Submit
2. Proposal Review and Certification Form (Proposal Cover Sheet)
3. Conflict of Interest Disclosure Form
4. Time and Effort Report Form
5. Principal Investigator Action Form (PI Change Form)
6. Request for Budget Change
7. Subcontract Data Sheet
8. Budget Approval Form



**NOTICE OF INTENT TO SUBMIT**  
**Office of Research and Sponsored Programs (OSP)**

<b>PI NAME</b>	
<b>OTHER PI's or CO-I's</b>	
<b>TELEPHONE NUMBER</b>	
<b>DEPARTMENT/COLLEGE</b>	
<b>EMAIL</b>	
<b>AGENCY</b>	
<b>CFDA#</b>	
<b>PROGRAM/SOLICITATION#</b>	
<b>PROGRAM TITLE</b>	
<b>Is AAMU limited to the number of proposals it can submit?</b>	YES or NO
<b>AGENCY DEADLINE</b>	MM-DD-YYYY
<b>Provide copy of - or web link to - FUNDING OPPORTUNITY #</b>	
<b>PROPOSAL TITLE</b>	
<b>AMOUNT</b>	
<b>Estimated percent or required amount of COST SHARE</b>	
<b>TYPE OF COST SHARE</b>	CASH MATCH or IN-KIND
<b>Is reduced IDC rate required by agency or requested by PI?</b>	YES or NO. If YES, what percentage? If PI requested, why?
<b>Will a Teaming Agreement, Subaward or Subcontract be issued with this proposal?</b>	YES or NO
<b>If yes, to whom?</b>	
<b>Date to submit draft proposal to OSP (10 working days prior to agency due date)</b>	MM – DD – YYYY
<b>Date to submit final proposal to OSP (4 working days prior to agency due date)</b>	MM – DD – YYYY

Return *Notice of Intent to Submit* form to OSP Grant Administrator and copy [OSP@aamu.edu](mailto:OSP@aamu.edu) **30 days prior** to proposal due date or as soon as decision to prepare a proposal has been made.

**Office of Research and Sponsored Programs (OSP)**

Carnegie Building – 2<sup>nd</sup> Floor, Normal, AL 35762 Telephone: (256) 372-5675 Fax: (256) 372-5030



**ALABAMA AGRICULTURAL AND MECHANICAL UNIVERSITY  
OFFICE OF RESEARCH AND SPONSORED PROGRAMS  
PROPOSAL REVIEW AND CERTIFICATION FORM**



AGENCY DEADLINE:	Date/Time		Date Submitted to OSP:		AAMU Proposal #:	
Electronic Submission?	No	Yes	Grants.Gov	FastLane	Other (Specify):	
Hard Copy Submission?	No	Yes	Number of Copies:	Is there any cost share?	No	Yes
					In-kind	If yes please see page 2 (Cost Share Section)
					Cash Match	

	Name	Dept:	School	Phone	Email
Principal Investigator:					
Co-PI:					
Co-PI:					
Co-PI:					
Co-PI:					
Co-PI:					

Agency Name:	CFDA No.	Solicitation No.
Agency Program Title:		
Proposal Title:		
Mailing Address: (For Hardcopy Submission)	City:	State: Zip:
Project Start Date:	Project End Date:	

			Project Requirements (Check all that apply):		
<b>Type of Project:</b> (Check one)	Research	<b>Type of Award:</b> (Check one)	Grant	Addtl Personnel	Conference or Public Presentation
	Student Support		Agreement	Student Support	Animal Welfare
	Training	<b>Classification:</b> (Check one)	Contract	Release Time	Human Subjects
	Facilities/Equip:		New	Addtl Space or Renovation	Biohazard Review
	Service		Renewal		
	Other		Continuation		
		Supplement			

Abstract (Project Abstract not to exceed 250 words):





## ALABAMA A&M UNIVERSITY OFFICE OF SPONSORED PROGRAMS

### CONFLICT OF INTEREST DISCLOSURE FORM

**New Submission**

**Update**

The purpose of this disclosure statement is for investigators at Alabama A&M University to ensure that no unresolved conflict exists between their outside financial interests and their commitment to their research or educational activities funded by Private and Federal Agencies such as the National Science Foundation (NSF) and the National Institute of Food and Agriculture (NIFA); and/or their proposed protocol for the use of human subjects in research. This statement conforms to current Federal guidelines requiring limited and targeted financial disclosure and review of the disclosure by a responsible University representative. This statement discloses specific facts to help the appropriate Reviewer determine if a conflict of interest exists so that the University can manage, reduce, or eliminate the conflict.

**Investigator's Full Name:** \_\_\_\_\_

**Employee ID Number:** \_\_\_\_\_

**Department/College:** \_\_\_\_\_

**Sponsoring Agency/Award #:** \_\_\_\_\_

**Title of Project:** \_\_\_\_\_

1. Are you or a member of your immediate family, a director, officer, partner, employee, or agent, or in any managerial position in any business enterprise outside of the University that might affect or be affected by your activities under the referenced proposal or award?  
 Yes (If Yes, describe in detail the nature and extent of the affiliation on an attached sheet.)  
 No
2. Are you or your spouse or dependents the actual or beneficial owner of more than five percent (5%) of the voting stock or controlling interest of any Business Enterprise in your field of academic interest or specialization as it specifically relates to the referenced proposal or award?  
 Yes (If Yes, describe in detail the nature and extent of the affiliation on an attached sheet.)  
 No
3. Have you or your spouse or dependents collectively derived more than \$10,000 in income within the past year or do you or any member of your immediate family anticipate deriving collectively income exceeding \$10,000 per year from any business enterprise in your field of academic interest or specialization as it specifically relates to the referenced proposal or award?  
 Yes (If Yes, describe in detail the nature and extent of the affiliation on an attached sheet.)  
 No

**Instructions:** This report is to be completed by AAMU Faculty/Staff receiving research or teaching awards funded by a Federal/State Agency or private company. Return the completed/signed form to the Office of Sponsored Programs.



**ALABAMA A&M UNIVERSITY  
OFFICE OF SPONSORED PROGRAMS**

**CONFLICT OF INTEREST DISCLOSURE FORM**

4. Do you or members of your immediate family have any other significant financial interest, including salary or other payments for services, equity interest, and/or intellectual property rights in any business enterprise in your field of academic interest or specialization as it specifically relates to the referenced proposal or award?

Yes (If Yes, describe in detail the nature and extent of the affiliation on an attached sheet.)

No.

**CERTIFICATION:**

I have read and understand the Alabama A&M University Disclosure for Federal-funded Projects; have made all financial disclosures required; and will comply with any conditions or restrictions imposed to manage, reduce or eliminate actual or potential conflicts of interests.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**REVIEWER'S CERTIFICATION:**

I certify that to the best of my knowledge the person named above has disclosed all reportable outside interests and activities, as related to the referenced proposal or award sponsored by A Federal Agency or protocol submitted for IRB review. I further certify that I have reviewed the disclosure and have determined:

no conflict exists

any conflict has been managed, reduced, or eliminated

the conflict cannot be resolved, please notify the sponsoring agency. Additional information is attached.

Signature: \_\_\_\_\_

Typed/Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_





**ALABAMA A&M UNIVERSITY  
OFFICE OF SPONSORED PROGRAMS  
Time and Effort Report Form**

*Reporting Period*

- 1<sup>st</sup> Quarter report due January 15<sup>th</sup> covering October – November - December
- 2<sup>nd</sup> Quarter report due April 15<sup>th</sup> covering January – February - March
- 3<sup>rd</sup> Quarter report due July 15<sup>th</sup> covering April – May - June
- 4<sup>th</sup> Quarter report due October 15<sup>th</sup> covering July – August - September

**INSTRUCTIONS:** All personnel paid from research funds must record time and effort in order to adhere to OMB Circular A-21 regulations. You are required to submit a completed form to the Office of Sponsored Programs, 2<sup>nd</sup> Floor Carnegie Building by the 15<sup>th</sup> of each month after the end of each quarter. Failure to submit the required Time and Effort Report may result in the suspension of all accounts associated with project fund numbers. Tel.: 256-372-5675; Email: [OSP@aamu.edu](mailto:OSP@aamu.edu).

Employee's Banner No:	Employee's Name:
Project Title(s):	
Agency Award or Accession Number(s):	
Specific Objectives:	

Teaching

**Semester Faculty Load (SFL):**

Fall \_\_\_\_\_

Spring \_\_\_\_\_ %

Summer \_\_\_\_\_

**Administration** \_\_\_\_\_ %

Account Number(s): \_\_\_\_\_

Project Account Number	% Allocated
FoAP:	
FoAP:	
FoAP:	
FoAP:	
*This column should equal the TOTAL amount of time charged to all project(s). =>	

**SFL + Admin + Total Time Allocated to Projects =100%**

**Accomplishment:**


**Impact:**




**ALABAMA A&M UNIVERSITY  
OFFICE OF SPONSORED PROGRAMS  
Time and Effort Report Form**

**Publications:**


I certify that the above information is correct\*.

\_\_\_\_\_  
Employee Date

\_\_\_\_\_  
Budget Manager Date

\_\_\_\_\_  
Department Chair Date

\_\_\_\_\_  
Dean/Research Director Date

\*Your signature indicates that the information reported is true and accurate. Any discrepancies in the information should be reported to the Office of Sponsored Programs within five working days of discovery. Failure to report discrepancies will be deemed as an intentional falsification of Time and Effort reporting. Any intentional falsification of information will be subject to university approved sanctions.

**ALABAMA A&M UNIVERSITY  
OFFICE OF SPONSORED PROGRAMS  
PRINCIPAL INVESTIGATOR ACTION FORM**

**INSTRUCTIONS:** This form is to be used for changing principal investigator/project director of a funded and/or non-funded project. Submit this completed form to the Office of Sponsored Programs, Carnegie Hall, 2nd Floor. Telephone number (256) 372-5678.

<b>Effective Date:</b>	
------------------------	--

<b>NEW Principal Investigator/Program Director</b>	<b>DEPARTMENT</b>	<b>COLLEGE</b>

<b>OLD Principal Investigator/Program Director</b>	<b>DEPARTMENT</b>	<b>COLLEGE</b>

**PROJECT/PROGRAM INFORMATION**

<b>Project/Program Title:</b>			
<b>Funding Agency:</b>			
<b>Contract/Grant/Agreement #:</b>		<b>Project Period (Start Date):</b> (mm/dd/yyyy)	
<b>FOAP Number:</b>		<b>Project Period (End Date):</b> (mm/dd/yyyy)	

**JUSTIFICATION FOR CHANGE**

**APPROVALS:**

\_\_\_\_\_  
Old Principal Investigator/Project Director      Date

\_\_\_\_\_  
Vice President for Research      Date

\_\_\_\_\_  
New Principal Investigator/Project Director      Date

\_\_\_\_\_  
Sponsor Notified by OSP      Date

\_\_\_\_\_  
Chairperson      Date

\_\_\_\_\_  
Grants & Contracts Accounting      Date  
Banner Update

\_\_\_\_\_  
Dean      Date





**SUBCONTRACT DATA SHEET**

*(A one page statement of work must be submitted with this form)*

<b>Subcontractors Name:</b>	
<b>Mailing Address:</b>	
<b>City/State/Zip:</b>	
<b>Amount of Subcontract:</b>	
<b>Term of Subcontract:</b>	
<b>Title of Subcontract:</b>	
<b>Technical Contact</b>	
<b>Name:</b>	
<b>Address:</b>	
<b>City/State/Zip:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	
<b>Contractual Contact</b>	
<b>Name:</b>	
<b>Address:</b>	
<b>City/State/Zip:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	
<b>Authorized Official for Subcontractor:</b>	
<b>Title:</b>	
<b>AAMU Principal Investigator:</b>	
<b>P.O. Box:</b>	
<b>City/State/Zip:</b>	Normal, AL 35762
<b>Email Address:</b>	
Please submit completed form to respective Grants Administrator via e-mail or fax to 256- 372-5030.	

Proposal ID: _____	Grant ID: _____	Date: _____	College: _____
PI Name: _____ (Last Name, First Name)	PI Banner Number: _____	Department: _____	
Award Title: _____			
Award Number: _____			
Funding Source Agency: _____		Effort Reporting: _____	
Pass Thru: _____	Sub-Awardee: _____		
Project Period: _____ (Start Date) to _____ (End Date)		Project Year: _____	
Budget Period: _____ (Start Date) to _____ (End Date)			
Project Type: _____	Award Type: _____	Is there a subcontract: _____	
Cost Share: _____	Cost Share Type: _____	Cost Share FOP#: _____	
Indirect Cost Rate: _____	Indirect Cost Basis: _____	Fringe Rate: _____	
Banner Fund: _____	Organizational Code: _____	Account Program Code: _____	

BANNER CODE	TITLE	FEDERAL BUDGET	COST SHARING	TOTAL PROJECT VALU
<b>Senior Personnel</b>				
61003	Principal Investigator		-	-
61008	Other Salaries		-	-
<b>Fringe</b>				
62002	Social Security Fed Matching		-	-
62003	Retirement Matching		-	-
62004	Retirement Matching Federal		-	-
62005	Group Insurance Life		-	-
62006	Group Insurance Hospital		-	-
62007	Unemployment Compensation Ins		-	-
62008	Workers Compensation Insurance		-	-
<b>Student Personnel</b>				
61006	Research Assistant		-	-
61009	Wages		-	-
61010	Graduate Assistant		-	-
61011	Wages Students		-	-
<b>Participant Cost</b>				
71001	Fellowships		-	-
71002	Scholarships		-	-
71003	Awards		-	-
71004	Misc Student Awards		-	-
71005	Stipends		-	-
73101	Fees Paid For Students		-	-
73209	Subsistence Allowance Student		-	-
74309	Non Student Stipends		-	-
73401	Student Travel Cultural		-	-
73407	Student Travel		-	-
<b>Travel</b>				
73402	Travel		-	-
73405	Travel Advance		-	-
73406	Recruiting		-	-
<b>Supplies</b>				
73001	Office Supplies		-	-
73002	Instructional Supplies		-	-
73004	Educational Materials		-	-
73005	Other Supplies		-	-
74914	Animal Purchases		-	-
74915	Books		-	-
73804	Computer Equipment		-	-
<b>Subcontracting</b>				
74301	Other Contractual Services		-	-
74306	Legal		-	-
74307	Consultant		-	-
<b>Other Direct Cost</b>				
74103	Subscriptions		-	-
74104	Publication		-	-
74201	Printing Duplication And Binding		-	-
73603	Postage		-	-
74314	Honorariums		-	-
74315	Guest Lecturers		-	-
74702	Conferences		-	-
74703	Workshops		-	-
74910	Other General Expenses		-	-
<b>Equipment</b>				
77001	Land		-	-
77002	Buildings		-	-
77003	Improvements		-	-
77004	Renewal And Replacement		-	-
77005	Equipment		-	-
<b>IDC</b>				
75001	Indirect Costs Sponsored Progs		-	-
Total			-	-
<b>TOTAL</b>			-	-

Disclosure: \_\_\_\_\_ accept full responsibility of all purchases made on the above account/budget and will conform to Principal Investigator/Budget Manager and guidelines.

Signatures: \_\_\_\_\_ Date \_\_\_\_\_ V.P. Institutional Research, Planning and Spons \_\_\_\_\_ Date \_\_\_\_\_

## **Appendix C.      Research Compliance Manual**

See website for latest version of Research Compliance Manual:

<http://www.aamu.edu/administrativeoffices/irpsp/sponsoredprograms/ORC/RCompliance.pdf>

# **Research Compliance Manual**



**Alabama Agricultural and Mechanical University**

**Normal, Alabama 35762**

**Motto: “Service Is Sovereignty”**



## TABLE OF CONTENT

TABLE OF CONTENT .....	ii
Preface.....	1
I. Compliance Plan Overview .....	1
II. Roles and Responsibilities .....	2
Office of Research Compliance .....	2
Office of Research and Sponsored Programs .....	3
The Grants and Contracts Accountant: .....	3
Office of Internal Audit .....	3
Institutional Review Board for the Protection of Human Subjects.....	3
Institutional Animal Care and Use Committee.....	3
Institutional Biosafety Committee .....	4
III. Written Policies and Procedures .....	5
Researcher Code of Conduct .....	9
IV. Oversight of Research Compliance Plan .....	10
University Compliance Steering Committee .....	10
Purpose and Authority.....	10
Steering Committee Chair.....	10
Steering Committee Membership .....	10
Steering Committee Meetings .....	11
Research Compliance Operations Committee .....	11
Purpose and Authority.....	11
Research Compliance Operation Committee Chair .....	11
Research Compliance Operation Committee Membership.....	12
Research Compliance Operation Committee Meetings.....	12
Vice President for Research.....	12
Director, Office of Research Compliance /Compliance Officer.....	13
V. Education and Training.....	13
VI. Effective Lines of Communication.....	14
Access to ORC and Supervisors .....	14
VII. Complaints and Non-Compliance.....	14
Allegations of Research Non-Compliance .....	15
Response and Corrective Action for Allegations of Non-Compliance.....	16
VIII. Internal Reviews and Monitoring.....	16
IX. Research Compliance Plan Revisions.....	17
X. Coordination .....	17

# Preface

The Research and Sponsored Programs Compliance Plan (Compliance Plan) provides guidance to the Alabama A&M University (“AAMU” or “University”) community regarding the responsible conduct of research. The purpose of the Compliance Plan is to establish a framework for research compliance at AAMU and to promote adherence to research-related Federal and State laws and regulations. AAMU expects the Compliance Plan to further its fundamental missions of instruction, research, and outreach. The Compliance Plan is not intended to set forth, replace, or define all the substantive policies, programs, and practices of AAMU designed to achieve research compliance. AAMU already maintains various research compliance practices, and those practices may be incorporated as part of this Compliance Plan.

## I. Compliance Plan Overview

AAMU's research compliance activities rely on the combined efforts of researchers, support staff, study participants, and others, as well as collaboration among departmental, administrative, and business units of the University.

The University's goal is to provide information, support, and systems needed to meet the laws, rules, and policies governing research in the most reasonable, efficient, and effective way. The University designed the Compliance Plan to be proactive, transparent, and integrated to prevent problems before they happen without impairing research.

**The Compliance Plan is founded upon the following core elements:**

- |  |  |
|--|--|
| <p>1. <b><u>Written Policies and Procedures</u></b><br/>Design standards and policies that effectively enable researchers and others to meet compliance requirements.</p>  | <p>2. <b><u>Oversight of Research Compliance</u></b><br/>Designate a research compliance officer and research compliance committees that are integrated into University-wide compliance.</p>                                       |
| <p>3. <b><u>Education and Training</u></b><br/>Communicate standards, policies, and responsibilities to researchers, administrators, and others through timely, appropriate and effective education and training on responsible conduct in research.</p> | <p>4. <b><u>Effective Lines of Communication</u></b><br/>Develop and maintain effective systems of communication, including resources for promptly responding to research compliance questions or concerns.</p>                    |
| <p>5. <b><u>Internal Reviews and Monitoring</u></b><br/>Implement monitoring and auditing systems to assure research compliance, detect breakdowns, and identify potential problem areas.</p>  | <p>6. <b><u>Enforce Standards</u></b><br/>Enforce standards fairly, consistently &amp; through well publicized disciplinary guidelines.</p>  |
| <p>7. <b><u>Response and Corrective Action</u></b><br/>Responding promptly to detected problems and undertake corrective action. This includes evaluation and modification of the Compliance Plan where appropriate to prevent similar problems.</p>     | <p>8. <b><u>Defined Roles and Responsibilities</u></b><br/>Maintain clear roles and research compliance responsibilities for all parties; using due care and appropriate oversight when assigning compliance responsibilities.</p> |

## **II. Roles and Responsibilities**

The responsibility and accountability for compliance and ethical conduct of activities vest in each administrator, faculty member, staff member, and student of the University either directly involved in and/or providing support services. All persons involved in grants, research, sponsored programs and associated compliance areas of the University will conduct their business in accordance with all applicable laws, regulations, policies and procedures, and the highest professional and ethical standards.

Each compliance area committee, board, or office is responsible to develop, implement, distribute, and update its policies and procedures related to research, grants, and other sponsored programs.

### **Office of Research Compliance (“ORC”)**

The ORC was created to develop, coordinate, communicate, plan, implement, and monitor compliance in research conducted at AAMU or involving AAMU faculty, staff or students. The Vice President for Research (“VPR”) shall designate a research compliance officer (the Director of Research Compliance [DoRC]), who will be responsible for overseeing the ORC and directing efforts to enhance research compliance, including implementation of the Compliance Plan. The responsibilities and functions of the ORC include the following:

- Overseeing and monitoring implementation of the Compliance Plan;
- Reporting on a regular basis to the VPR, Research Compliance Operations Committee (“RCOC”), and the University Compliance Steering Committee (“UCSC”) on research compliance matters and assisting these individuals or groups to establish methods to reduce the institution’s vulnerability to fraud and abuse;
- Periodically reviewing and, as appropriate, recommending revisions to the Compliance Plan to respond to changes in the institution’s needs and applicable Compliance Plan requirements, continuously strive to enhance the compliance program, or identified systemic patterns of noncompliance;
- Developing, coordinating, and participating in a multifaceted educational and training program that focuses on the elements of the Compliance Plan, and seeking to ensure that all affected employees understand and comply with pertinent Federal and State standards and applicable University policies;
- Developing policies and procedures;
- Assisting the institution’s internal or independent auditors in coordinating compliance reviews and monitoring activities;
- Reviewing and, where appropriate, acting in response to reports of noncompliance brought to the DoRC’s attention;
- Independently investigate and act on matters related to research compliance. The DoRC should have the flexibility to design and coordinate internal investigations (e.g., responding to reports of problems or suspected violations) and any resulting corrective action (e.g., making necessary improvements to policies and practices, and taking appropriate disciplinary action) with particular departments or institution activities; and
- Participating with the Office of General Counsel in the appropriate reporting of any self-discovered violations of Federal or State requirements.

**Office of Research and Sponsored Programs (ORSP) will:**

- Implement and interpret sponsor and University policies and procedures for compliance with applicable regulations.
- Train research personnel in preparation of grant/contract application and managing sponsored research.
- Propose policies and procedures to senior administration in compliance with grants and contracts management regulations.
- Coordinate with other University research and sponsored programs oversight committees, boards, and offices to ensure that specific proposals and projects have been reviewed and approved for compliance.
- Advise Institutional Review Board for the Protection of Human Subjects (IRB), Institutional Animal Care and Use Committee (IACUC), Institutional Biosafety Committee (IBC), and Faculty Research Committee on compliance issues.
- Provide administrative support to IRB, IACUC, IBC, and Faculty Research Committee.
- Conduct pre-submission compliance review of proposals for external funding, except those submitted by the Director of Corporate and Foundation Relations.
- Manage post-award compliance issues.
- Work with Grants and Contracts Accountant and PIs to ensure timely and consistent award closeout.

**The Grants and Contracts Accountant (GCA) will:**

- Make Project Directors/Investigators, and others involved in project management, aware of financial commitment and financial reporting requirements.
- Communicate the University's Policies and Procedures requirements of grant accounting.
- Work with OSP and Project Directors to ensure timely and consistent award closeout
- Complete OMB A-133 audit required schedules in a complete and timely manner.
- Notify the Compliance Officer and the AAMU Office of Internal Audit regarding any unusual circumstances/events.

**Office of Internal Audit will:**

- Assist the University's external auditing firm in conducting the University's annual OMB Circular A-133 audit.
- Perform periodic internal audits of selected University federal research grants as provided for in the internal audit plan. The scope of these audits will include procedures to test the University's compliance with OMB Circulars A-21 (cost principals) and A-110 (administrative practices).
- Monitor grant effort reporting by periodically reviewing a selection of federally funded labor, fringe and overhead costs.
- Issue a report of audit findings and any corrective actions needed to ORC.

**Institutional Review Board for the Protection of Human Subjects (IRB) will:**

- Review for approval research protocols in which human subjects are involved.
- Monitor ongoing progress of approved protocols.
- Provide for education and training in human subjects research.

**Institutional Animal Care and Use Committee (IACUC) will:**

- Review for approval research protocols in which animal subjects are involved.
- Monitor ongoing progress of approved protocols.
- Provide for education and training in animal subjects research.

**Institutional Biosafety Committee (IBC) will:**

- Review and approve use of recombinant DNA in research activities.
- Review for approval all research protocols in which use of recombinant DNA is involved.
- Monitor ongoing progress of approved protocols.
- Provide for education and training in biosafety.

**Radiation Safety Committee (RSC) will:**

- Review and approve procurement and use of radioactive materials.
- Provide administrative support to faculty, technicians and students using radioactive materials for research and education.
- Review for approval all research protocols involving the use of radioactive materials.
- Provide for the education and training in the use of radioactive materials.
- Require semiannual reports documenting procurement, use, and safe disposal of radioactive materials.
- Represent the University in regulatory matters with the U.S. Nuclear Regulatory Commission and /or state governmental units involved in nuclear licensing and use.

**Laboratory and Chemical Safety Committee (LCSC) will:**

- Review safety and health policies and procedures established by the agency pertaining to laboratory and chemical safety.
- Review incidents involving work-related fatalities, injuries, illnesses or near misses related to laboratory and chemical safety.
- Review employee complaints regarding safety and health hazards related to laboratory and chemical safety.
- Conduct inspections of laboratories and worksites utilizing chemicals at least annually and in response to complaints regarding safety or health hazards.
- Conduct interviews with employees in conjunction with inspections of the workplace.
- Review agency's training records related to laboratory and chemical safety to ensure compliance with regulatory training requirements.
- Conduct meetings at least once every three months. Maintain written minutes of such meeting and send copy to each committee member. Copy of minutes shall be posted in the appropriate workplace.
- Shipment and receipt of laboratory chemicals.
- Flammable liquids and other fire hazards in laboratories.
- Security of laboratory chemicals.
- Carcinogens, reproductive toxins and pesticides.

### III. Written Policies and Procedures

This section highlight some of the research activities that are governed by specific laws or regulations and may require approval of one or more University committees/boards and/or additional training before research activity can be initiated.

Projects that involve the use of human subjects, animals, recombinant DNA molecules, infectious agents, or other bio hazardous agents must comply with Federal, State and University requirements. A research protocol involving any of these items must be submitted to and approved by the appropriate University oversight committee before the project can begin.

Topic
<p><b>Institutional Animal Care and Use Committee (“IACUC”)</b></p> <ul style="list-style-type: none"><li>Any research protocol involving vertebrate animals must be submitted to the Institutional Animal Care and Use Committee (IACUC) for review and approval. Principal Investigators or Program/Project Directors and their staff are expected to comply with all federal laws and regulations, as well as IACUC requirements and procedures, during all phases of research involving vertebrate animals.</li></ul> <p>Ref: <a href="http://grants.nih.gov/grants/olaw/references/phspol.htm#FunctionsoftheInstitutionalAnimalCareandUseCommittee">http://grants.nih.gov/grants/olaw/references/phspol.htm#FunctionsoftheInstitutionalAnimalCareandUseCommittee</a> Ref: <a href="http://awic.nal.usda.gov/government-and-professional-resources/federal-laws/animal-welfare-act">http://awic.nal.usda.gov/government-and-professional-resources/federal-laws/animal-welfare-act</a></p>
<p><b>Institutional Biosafety Committee (“IBC”)</b></p> <ul style="list-style-type: none"><li>Any research protocol involving the use of recombinant DNA, infectious agents, and/or other bio hazardous agents must be reviewed and approved by the Institutional Biosafety Committee (IBC).</li></ul> <p>Ref: <a href="http://osp.od.nih.gov/office-biotechnology-activities/biosafety/nih-guidelines">http://osp.od.nih.gov/office-biotechnology-activities/biosafety/nih-guidelines</a> Ref: <a href="http://osp.od.nih.gov/sites/default/files/NIH_Guidelines_0.pdf">http://osp.od.nih.gov/sites/default/files/NIH_Guidelines_0.pdf</a></p>
<p><b>Institutional Review Board for the Protection of Human Subjects in Research (IRB)</b></p> <ul style="list-style-type: none"><li>Any research protocol involving human subjects, including exempt projects, must be reviewed by AAMU’s Institutional Review Board (IRB) before the research project is initiated. IRB review and approval ensures compliance with federal regulations. Principal Investigators or Program/Project Directors and their staff are expected to comply with all federal and state laws and regulations, as well as IRB requirements and procedures, during all phases of research involving human subjects.</li></ul> <p>HHS Regulations:</p> <ul style="list-style-type: none"><li>•45 CFR part 46 HHS Regulations for the Protection of Human Subjects</li><li>•45 CFR parts 160 and 164 Health Insurance Portability and Accountability Act (HIPAA) Regulations for Standards for Privacy of Individually Identifiable Health Information</li><li>•42 CFR part 50, Subpart F HHS Regulations for Responsibility of Applicants for Promoting Objectivity in Research for Which PHS Funding is Sought.</li></ul> <p>Ref: <a href="http://grants.nih.gov/grants/policy/hs/ethical_guidelines.htm">http://grants.nih.gov/grants/policy/hs/ethical_guidelines.htm</a> Ref: <a href="http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html">http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html</a></p>

### **Environmental Health and Safety (EHS) in Research Activities**

- All Research Personnel shall ensure a safe and healthy environment by complying with the Occupational Safety and Health Administration (OSHA) guidelines and all applicable federal, state, and local guidelines related to laboratory standards and disposal of hazardous waste.
- All Research Personnel conducting research involving potentially hazardous and/or regulated materials must have knowledge of and be responsible for those materials. These personnel must receive required training in accordance with the Hazard Communication Standard (29 CFR 1910.1200), Laboratory Safety Standard (29 CFR 1910.1450), and, if working with human blood, the Blood borne Pathogens Standard (29 CFR 1910.1030).
- Additionally, those conducting research involving human blood, tissue, and/or body fluids that may contain blood must have proper documentation of immunization for hepatitis B or a written statement of their decision to decline immunization. Those using any chemicals in research must maintain an annually updated inventory of those chemicals, and Material Safety Data Sheets (MSDS) for all chemicals on hand within the facility must be easily accessible in case of emergency. When a laboratory is to be vacated, the lead researcher in the laboratory shall ensure proper redistribution or disposal of excess chemicals and/or chemical waste.
- **Radiation Safety in Research Activities:** The Principal Investigator (PI) is responsible for all activities involving radioactive materials, radiation-generating equipment, and/or lasers in the laboratory. This person must apply for and receive a permit from the Radiation Safety Committee (RSC) to use radioactive materials before such work may commence. It is this person's responsibility to understand the state and federal regulations and conditions of his/her permit, and to ensure that all staff in the laboratory comply with those regulations and conditions.

Ref: <http://www.aamu.edu/administrativeoffices/business-and-finance/health-safety/Pages/default.aspx>

### **Research Integrity**

- **Authorship:** Standards for authorship vary among disciplines, journals, and other outlets for communicating research. In the absence of specific standards as required by a publisher or editorial board, the following guidelines should be followed. Authorship should be limited to those who have made a direct significant intellectual contribution to the concept, design, execution, or interpretation of the work. Honorary, guest, or fictitious authorship is not acceptable.
- Other contributions by individuals, including acquisition of funding; provision or recruitment of technical services, materials, or subjects; management of a study; or collection of data, should be acknowledged. Such contributions, even if essential to the work, are not in themselves sufficient for authorship.
- **Peer Review:** Through peer review, members of the scientific community advise each other regarding research proposals, publishing research results, and career advancement. Peer review is an essential component of the research process and

serves its intended function only if members of the scientific community are prepared to provide thorough, fair, and objective evaluations based on requisite expertise. Privileged information or ideas obtained through peer review must be kept confidential and must not be used for competitive gain.

- Those engaged in peer review should disclose conflicts of interest resulting from direct competitive, collaborative, or other relationships with any of the authors and should avoid cases in which such conflicts preclude providing an objective evaluation.

### **Export Control**

- Research Personnel are expected to comply with state and federal regulations regarding export controls. Export control laws are federal laws and regulations that regulate the "export" of strategically important commodities (articles, materials, or supplies), software and technology (specific information necessary for the development, production, or use of a product) to foreign persons. The exports are regulated for reasons of national security and trade protection. The context is what is being exported, to whom and for what use. When an export falls under these laws, a license is required before the export can occur.
- If research involves controlled items, the University may be required to obtain prior federal approval before allowing foreign nationals to participate in research, partnering with a foreign entity, or sharing results with foreign nationals. This applies regardless of whether and how the research is funded. There are general exceptions to the laws that apply to most on-campus research or educational activities. For example, there is an exception for basic and applied research in science and engineering the results of which ordinarily are published and shared broadly within the scientific community (fundamental research). Please contact the Office of Research and Compliance with questions regarding export controls.

Ref: International Traffic in Arms Regulation (ITAR) governing "defense articles and services" (predominately military items and information, including satellites and spacecraft) <http://pmdtc.state.gov/>  
Export Administration Regulations (EAR) governing commodities, goods, and commercial information (primarily civilian) <http://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>

Office of Foreign Assets Control (OFAC) administers and enforces trade embargos and sanctions  
<http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx>

### **Sponsored Research**

- The Principal Investigator or Program/Project Director is responsible for all aspects of the research project or sponsored program, including the proper stewardship of research or sponsored program funds.
- All funds must be spent in a manner consistent with the terms and conditions of the award (e.g., grants, contracts, research protocols) and in compliance with University policies. Those in charge of research or other sponsored program budgets have an obligation to monitor records of expenditures for compliance with University policies and procedures, and to allow inspection of those records by appropriate parties or government agencies.



### **Time & Effort Reporting**

- The purpose of the Time and Effort Reporting Policy is to set forth the policy and procedures that AAMU employees must follow in order to comply with the salary allocation requirements of OMB Circular A-21 and other applicable sponsor requirements.

All employees who are involved in allocating salaries to sponsored projects or completing Time and Effort reports are responsible for understanding the principles of accurate time and effort reporting and salary allocation.

All departments must ensure that initial allocations of salaries to sponsored projects are reasonable in relation to the expected effort of the employees whose salaries are being allocated, and that such allocations are monitored and adjusted where necessary to reflect significant changes in employee effort.

All departments must complete and submit Time and Effort reports on a timely basis and in the correct format for all employees who are subject to time and effort reporting requirements.

All Time and Effort reports must meet the standards of accuracy set forth in applicable Federal Circulars. All adjustments to prior salary allocations that are necessary as a result of a completed Time and Effort report must be made in a timely and accurate manner.

Compliance with this policy is very important, because it is a legal obligation imposed on AAMU by Federal regulations and by the terms and conditions of sponsored projects. PIs who are noncompliant will be referred to the DoRC who upon review and follow-up will endorse suspension of all activities on the grant.

### **Conflicts of Interest and Commitment.**

Research Personnel are expected to conduct their research and sponsored program activities in such a manner as to avoid any conflict of interest or the appearance of a conflict of interest. All Research Personnel are required to comply with all federal regulations related to financial conflicts of interest in the conduct of grant, contract, or cooperative agreement activities; and will be required to disclose any actual or potential conflict of interest.

### **Technology Transfer & Licensing**

- Technology transfer is the process by which results of R&D are applied and used in another area, organization, or commercial sector. It is AAMU's policy to coordinate its technology transfer activities consistent with its mission and responsibilities pursuant to the Federal Technology Transfer Act of 1986, as amended, and other applicable technology transfer laws and regulations.

Ref: <http://www.ott.nih.gov/hhs-technology-transfer-policies>

Ref: <http://www.federallabs.org/store/greenbook/>

Ref: <http://newslink.federallabs.org/2011/02/14/president-signs-america-competes-reauthorization/>

Ref: <http://www.gpo.gov/fdsys/pkg/DCPD-201100803/html/DCPD-201100803.htm>

## **Researcher Code of Conduct**

AAMU has a strong commitment to ensure that its research affairs are conducted in accordance with applicable laws and regulations. Therefore, research personnel (e.g., faculty, staff, students, and postdoctoral scholars) shall comply with all applicable laws, regulations, and contracts related to the conduct of research and sponsored program activities conducted at and/or approved by AAMU. Those involved in research and sponsored programs activities at or through AAMU shall conduct their activities with the highest ethical standards and in accordance with the standards of the community and their respective professions.

All members (administrators, faculty, staff and students) of the AAMU community are expected to report through normal supervisory channels or through the AAMU Office of Research Compliance any violations or concerns of violations of any Federal or State requirements related to research and any violations of AAMU policies and procedures related to research.

AAMU employees will be subject to disciplinary action as a result of any failure to comply with applicable Federal or State requirements related to research and/or with AAMU policies and procedures related to research, which includes knowing failure to report non-compliance.

AAMU will neither discriminate nor retaliate against any AAMU member who reports, in good faith, any instances of conduct that do not comply or appear not to comply with Federal or State laws and regulations and/or AAMU policies and procedures related to research. Any AAMU member has the right to remain anonymous and to use confidential mechanisms (including but not limited to a mail-in form, secure email and phone line) provided by AAMU to disclose non-compliant activity to the Office of Research Compliance without fear of retaliation of such reports.

Research participants, participants' family members, and other external to the university, including regulatory agencies may also report suspected non-compliance to the Office of Research Compliance. The reports may be in form of complaints and may also be made anonymously.

## **IV. Oversight of Research Compliance Plan**

This section addresses the process by which AAMU designates appropriate officers and committees to oversee and coordinate research compliance. It also defines the respective roles and responsibilities by which AAMU addresses research compliance oversight.

### **University Compliance Steering Committee (UCSC)**

#### **Purpose and Authority**

The University Compliance Steering Committee (“Steering Committee”) is AAMU-wide committee that reports to AAMU Audit Committee. The purpose of the Steering Committee is to provide strategic guidance and oversight with respect to University-wide compliance matters. This includes, among other things, oversight of compliance as it relates to the following: conflicts of interest and commitment, and research compliance.

The responsibilities and functions of the Steering Committee include guidance for an effective Compliance Plan at AAMU, which are accomplished through the following functions:

- Setting specific compliance objectives on an annual basis, including annual review of the effectiveness of the Compliance Plan;
- With regard to research, providing leadership and direction regarding the Compliance Plan;
- With regard to audit findings or allegations of non-compliance brought to the Steering Committee’s attention, taking action it deems necessary;
- Coordinating research compliance initiatives on a University-wide basis. This includes review to ensure that there are consistent standards for areas of common concern as well as ensuring more effective communication and use of resources.

#### **Steering Committee Chair**

The Vice President for Research (VPR) shall be the Chair of the Steering Committee. If the Steering Committee Chair is unable to attend a meeting, the Chair shall appoint and otherwise delegate to another member of the Steering Committee the Chair's responsibilities, as circumstances require.

#### **Steering Committee Membership**

The President of AAMU is responsible for appointing members to the Steering Committee. Standing members of the Steering Committee include the following:

- VPR (Chair)
- Dean/Research Director, College of Agricultural, Life & Natural Sciences
- Dean, Graduate School
- Dean, College of Business and Public Affairs
- Dean, College of Engineering, Technology & Physical Sciences
- Dean, College of Education, Humanities and Behavioral Sciences
- Director of Research Compliance (“DoRC”)

Standing committee members may nominate delegates in the event that they are unable to attend a meeting. The Chair also may invite guests, as appropriate, to attend Steering Committee meetings. All committee members should have the requisite seniority in their respective areas to recommend necessary changes to ensure compliance. Members of the Office of the General Counsel shall attend Steering Committee meetings in an ex officio capacity to provide legal counsel to the Steering Committee.

### **Steering Committee Meetings**

Upon a duly constituted quorum (greater than 50 percent of the membership), RCOC shall meet at least two times per year. Steering Committee members may attend meetings in-person or via electronic means (i.e., conference call, video conferencing). In instances where two consecutive scheduled meetings have failed due to continuous absence of a quorum, any number of members present at the third meeting will constitute a quorum and any decision(s) taken will be binding. All Steering Committee proceedings shall have minutes recorded for approval by the membership. A copy of the minutes shall be maintained by the Office of General Counsel.

## **Research Compliance Operations Committee (“RCOC”)**

### **Purpose and Authority**

The RCOC is a subcommittee of the Steering Committee and exists to provide guidance and recommendations to the Compliance Steering Committee for an effective Compliance Plan and for matters involving research compliance and to ensure a dialogue is maintained between the various compliance entities at the University. The RCOC accomplishes this through the following:

- Advising and assisting the VPR and DoRC in the development and maintenance of the Compliance Plan;
- Reviewing and providing guidance for proposed changes to the Compliance Plan;
- Facilitating the formation and maintenance of an adequate system of communication for reporting, education, and training concerning research compliance throughout AAMU;
- Analyzing specific risk areas for non-compliance;
- Reviewing and providing input on existing and new policies and procedures that address specific research compliance risk areas and that promote research compliance;
- Recommending appropriate approaches to promote compliance with the Compliance Plan and detection of potential violations; and
- Advising on a system to solicit, evaluate, and respond to research compliance complaints and issues.

### **Research Compliance Operation Committee (RCOC) Chair**

The DoRC shall be the Chair of the RCOC, and shall, in consultation with the VPR, be responsible for appointing members to RCOC. If the Chair is unable to attend a meeting, he or she shall appoint and otherwise delegate to another member of RCOC to serve as Chair, as circumstances require.

## **Research Compliance Operation Committee (RCOC) Membership**

Standing members of RCOC include the following:

- DoRC (Chair)
- Executive Director, Sponsored Programs
- Director, Grants and Contracts Accounting
- Research Faculty (one member from each college)

In addition to the standing members, the RCOC Chair may appoint any additional members to serve on the RCOC as determined necessary. The Chair also may invite guests, as appropriate, to attend RCOC meetings. Standing committee members may appoint temporary delegates. The Office of General Counsel shall attend RCOC meetings in an ex officio capacity to provide legal counsel to the RCOC.

## **Research Compliance Operation Committee (RCOC) Meetings**

Upon a duly constituted quorum (greater than 50 percent of the membership), RCOC shall meet regularly (i.e., at least four times per year). RCOC members may attend meetings in-person or via electronic means (i.e., conference call, video conferencing). Any action of the RCOC shall require a simple majority vote (greater than 50 percent of the quorum present). In instances where two consecutive scheduled meetings have failed due to continuous absence of a quorum, any number of members present at the third meeting will constitute a quorum and any decision(s) taken will be binding.

All RCOC proceedings shall have minutes recorded for approval by the membership. A copy of the minutes shall be maintained by the Office of General Counsel.

## **Vice President for Research (“VPR”)**

The VPR has overall responsibility for oversight and implementation of the Compliance Plan. The VPR also serves as the Institutional Official of the University’s HRPP/IRB and the IACUC. The VPR is responsible for ensuring that sufficient resources and support exist to implement the Compliance Plan and comply with all University policies and applicable Federal laws, regulations and guidelines with respect to research.

Although delegable, the VPR is responsible for the following:

- Facilitate and monitor all investigations and audit findings of potential and actual research non-compliance;
- Ensure that reports of research compliance activities are disseminated, as appropriate, to AAMU senior management and appropriate unit heads;
- Evaluate the effectiveness of the Compliance Plan;
- Assess existing policies and procedures that address significant compliance risk areas;
- Review and approve new policies and procedures addressing research compliance risk areas;

- Determine whether new or amended research policies and procedures should be presented for review and/or approval by the Steering Committee or other senior advisory groups;
- Supervise and oversee the activities and efforts of the DoRC;
- Ensure the formation and maintenance of an adequate system of communication for reporting, education, and training concerning research compliance throughout AAMU;
- Maintain a system to solicit, evaluate, and respond to complaints and issues.

## **Director, Office of Research Compliance (“DoRC”)/Compliance Officer**

In addition to all the responsibilities outlined under the ORC, the DoRC will:

- Work with University oversight committees and offices responsible for specific elements of compliance to ensure compliance with all regulatory requirements.
- Identify and assist in the development and implementation of such additional policies and procedures as are needed to address specific management and administrative processes required for compliance.
- Ensure that appropriate training programs are developed and delivered.
- Implement a process necessary to monitor compliance program elements.
- Ensure that policies and procedures related to research compliance are established, implemented, distributed, reviewed, and dated.
- Review and ensure disposition of matters of alleged noncompliance in consultation with the Executive Director, ORSP, the Faculty Research Committee and the Office of General Counsel.
- Guide relevant AAMU units in respect to compliance related procedures and regulations when necessary.
- Implement mandatory research compliance training (Responsible Conduct in Research)
- Compile a comprehensive annual non-compliance report.

The DoRC has full authority to review all research-related documents, financial records, contracts, and other information necessary to ensure compliance with regulatory requirements pertaining to research.

## **V. Education and Training**

One of the primary goals of the Compliance Plan is to provide for the education and training of appropriate administrators, both at the institutional and departmental levels, research faculty (including investigators), other research staff, and if warranted, contractors, on award administration and research compliance requirements. The nature and scope of training and its level of detail will depend on the type of activity and institutional needs.

The level and frequency of compliance training is depending on the extent of an individual's involvement in the research process as well as the requirements of the sponsor. Training mechanisms shall include:

- Training seminars related to current issues in research compliance and responsible conduct in research; and
- Web-based communications and training on responsible conduct in research, responsible conduct in use of human subjects in research, and responsible conduct in use of animals in research.

The DoRC shall maintain a schedule of research compliance seminars and available research compliance resources on the ORC website.

(<http://www.aamu.edu/administrativeoffices/irpsp/sponsoredprograms/Pages/ResearchCompliance.aspx>).

Documentation of training and education required by this Compliance Plan (e.g., attendee lists and training materials) shall be maintained by the AAMU unit (ORSP, ORC, IRB, IBC, IACUC, etc.) that provides such training/education.

## **VI. Effective Lines of Communication**

### **Access to ORC and Supervisors**

The ORC shall have an open-door policy and shall be available to:

- Answer questions from the research community about the Compliance Plan and the University's research-related policies and procedures; and
- Confidentially receive reports of research compliance problems.

University officials, department chairs, and other supervisors play a key role in responding to employee concerns. It is appropriate that these individuals serve as the first line of communication.

## **VII. Complaints and Non-Compliance**

### **Background**

As part of its commitment to compliance with applicable laws, regulations and guidelines with respect to research, AAMU reviews all complaints and allegations of research non-compliance and takes any necessary action.

AAMU maintains an open door policy of communication with regard to research related conduct that may be unethical or that may potentially or actually violate Federal or State laws and/or regulations. Knowledge or suspicion of improper research-related activity may originate from academic personnel, staff, administrators, internal or external auditors, law enforcement, regulatory agencies, customers, vendors, students, scholars, or third parties.

All faculty, staff and students and other individuals involved in research at AAMU are required to comply with all laws and regulations governing their research activities, as well as with requirements and determinations by AAMU research oversight entities (e.g., IRB, IACUC). This section describes how complaints and allegations of research non-compliance are handled by AAMU.

## **Allegations of Research Non-Compliance (Excluding Research Misconduct)**

All allegations of research non-compliance typically should be initially raised with the AAMU person with responsibility over the affected area or the authority to review the allegation. Persons receiving such reports must exercise appropriate judgment in determining which matters can be reviewed under their authority and which matters should be referred to a higher level of management or to the DoRC. When it is not clear whether the person receiving the report should handle the matter or should refer it to a higher level, the DoRC should be consulted.

Nothing in this Compliance Plan precludes an individual from raising directly with the DoRC concerns, complaints or allegations regarding research non-compliance. The DoRC ordinarily notifies the AAMU individual with responsibility over the affected area or the authority to review the allegation. However, if the DoRC has reason to believe that the allegation involves the AAMU individual with responsibility over the affected area or the authority to review the allegation, such person will not be notified.

Reports should be factual rather than speculative, and should contain as much specific information as possible to allow for proper assignment of the nature, extent, and urgency of preliminary investigative procedures.

Comments, concerns, requests, and reports regarding suspected compliance issues may be made by contacting the DoRC at 256-372-5729 or via email at [research.compliance@amu.edu](mailto:research.compliance@amu.edu). This phone number and email are answered only by ORC personnel. Anyone reporting research misconduct via the phone or email has the right to remain anonymous. To the extent possible within the limitations of law and regulation, all information will be treated and maintained as confidential.

AAMU individuals to whom complaints or allegations are made must document in writing the allegations, relevant facts, and outcome of the inquiry. Managers, administrators, and employees must report allegations/complaints to the DoRC when any of the following apply:

- The matter is the result of a significant internal control or policy deficiency that is likely to exist at other units within the University or University-related entities;
- The matter is likely to receive media or other public attention;
- The matter involves significant misuse of AAMU research resources or creates an exposure to potentially significant liability from improper research activity;
- The matter involves a potential criminal act based on research-related activity;
- The matter involves significant threat to the health and safety of persons from research-related activity; and/or
- Any matter that is judged to be significant or sensitive for other reasons.

If in doubt, contact the DoRC for assistance and guidance.



## Response and Corrective Action for Allegations of Non-Compliance

All allegations and complaints of research non-compliance will be reviewed by the appropriate unit of the University (e.g., DoRC, OSP) that has the responsibility for reviewing the allegation. Such review will consider all information and documents relevant to the allegation and any other pertinent information (e.g., interviews of witnesses, reviews of policies). In addition, confidential consultation with other areas with topical expertise may be prudent to ensure a reasonable and thorough review. Upon completion of the review, the DoRC shall recommend to the VPR one of the following findings:

Conclusion	Description
Compliant	Conformity with applicable regulations, policies, requirements or guidelines
Non-Compliant	Failure to conform or adhere with applicable regulations, policies, requirements or guidelines. Non-compliance can be minor or serious and sporadic or continuing.

Anyone who fails or refuses to comply with the Plan shall be subject to appropriate corrective action. Corrective action will consist of the immediate (1) termination of the noncompliant activity and (2) notification of appropriate University officials. The University will (1) make or seek any restitution necessary because of the noncompliance and (2) take any remedial steps to ensure future compliance.

Action by the University related to noncompliant conduct may include:

- Providing additional education and training programs,
- Modifying policies and procedures,
- Increasing monitoring activity, and/or
- Taking any other action necessary to comply with appropriate laws.

In addition to corrective action under the Plan, individuals may be subject to possible liability under local, state, and/or federal laws.

## VIII. Internal Reviews and Monitoring

The Compliance Plan shall include monitoring and auditing functions designed to determine compliance with statutory and regulatory requirements and/or University policy pertaining to research activity at AAMU. Such internal monitoring or auditing may be conducted solely by the DoRC or in conjunction with AAMU units (e.g., Grants and Contracts Accounting, Sponsored Programs Office). Audits of research may include such activities as on-site visits, interviews with personnel, reviews of written materials and documentation, financial accounting practices, and statistical analyses. The DoRC shall report the results of monitoring and auditing to the VPR, DOCC, and Steering Committee at least annually.

## **IX. Research Compliance Plan Revisions**

The Compliance Plan shall be amended by the VPR and, as appropriate, the Steering Committee to ensure that it is sufficiently tailored to the University and adaptable to changes in regulatory requirements. The Compliance Plan will be revised as experience shows that a certain approach is not effective or suggests a better alternative exists.

## **X. Coordination**

The DoRC shall serve on all the oversight committees in a capacity as specified in each committee's policies and procedures, oversee and ensure that research conducted at the University is in compliance with applicable regulations and University policies:

For research activity subject to two or more of the oversight committees, the DoRC shall liaise and serve as a common link among the involved committees regarding:

- Protocol review;
- Quality improvement findings;
- Non-compliance inquiries; and
- Non-compliance reporting.

## **Appendix D. Patent and Copyright**

Alabama A & M University's Patent and Copyright Committee shall consist of five persons appointed by the Vice President for Institutional Research and Sponsored Programs, upon approval by AAMU President. One representative shall be selected from the Office of the Comptroller, one representative shall be selected from the Office of Grants and Contracts, two representatives shall be selected from any two schools, and one representative from AAMU shall serve on this committee. The Vice President for Institutional Research and Sponsored Programs shall appoint the Chairperson of the Committee. Committee appointments will be from one (1) to three (3) years. Of the members on the Committee, two shall be appointed for a term of one (1) year, two shall be appointed for a term of two (2) years, and one shall be appointed for a term of three (3) years. A currently enrolled student may be appointed to this committee for a term of one (1) year as a committee member. Members of the Committee may be appointed to serve successive terms. In the event any seat on the Committee is vacated prior to expiration of the normal term, the Chairperson, in consultation with the Vice President for Institutional Research and Sponsored Programs, may appoint a successor to fill the unexpired term of the seat vacated.

### **The role of the Patents & Copyrights Committee is to:**

- (a) Advise the Vice President for Institutional Research and Sponsored Programs on policy matters relating to Patentable and Copyrightable materials;
- (b) Proposed revisions considered necessary to the Patent and Copyright Policy, and
- (c) Arbitrate disputes.

The committee shall meet as necessary but at least twice a year. To keep abreast of developments pertaining to Patent and Copyright laws, the committee should have a meeting within the fall semester and the spring semester.

### **Policy Applicability to Research Scientists, Academics Faculty and Students**

This policy shall be applicable to all full or part-time research scientists, academic faculty and students performing research for AAMU.

### **Assignment of Rights/Ownership**

Intellectual property or creative work developed by persons in relation to their participation in their employment or program of study at AAMU is the property of Alabama A&M University. All full or part-time research scientist, academic faculty and research graduate student shall, as a condition of employment with Alabama A&M University, execute an assignment of rights, assigning all rights, title and interest, to the extent prescribed in this policy, in any patent and copyright to Alabama A&M University.

## **Determination of Rights and Equities in Patent and Copyright Policy**

### **A. Sponsor-Supported Efforts**

The grants or contracts between the sponsor and AAMU, under which patentable and copyrightable material are produced, may contain specific provisions with respect to disposition of rights to these materials. The sponsor (1) may specify that the materials be placed in the public domain, (2) may claim reproduction, license-free use, or other rights, or (3) may assign all rights to AAMU. *In those cases where income is realized by AAMU, the inventor or creator may appropriately share (as determined by the Patent and Copyright committee) in the income. The nature and extent of the inventor or creator's participation in income is outlined in Section 1.4 in the Administrative Procedures.*

Inventions arising from research sponsored by the Federal Government shall be controlled by the terms of the contract, grant, or cooperative agreement, and any applicable federal regulations. Where patent rights are not claimed or are waived by the Federal Government, such inventions or discoveries shall be controlled by this policy.

### **B. University-Assigned Efforts**

Ownership of patentable and copyrightable materials developed as a result of an assigned employment effort shall reside with AAMU. The general obligation to produce scholarly and creative works does not constitute a specific assignment for this purpose.

### **C. University-Assisted Individual Effort**

Ownership of patentable and copyrightable materials developed by research scientist, academic faculty or research graduate students of Alabama A&M University where AAMU provides support of their efforts or use of institutional resources in more than a purely incidental way (unless such resources are available without charge to the public) shall be shared by the inventor or creator and by the AAMU. *The nature and extent of inventor or creator participation in income is outlined below in Section 1.5 in the Administrative Procedures.*

### **Individual Effort**

Ownership rights to patents or copyrights developed by research scientists, academic faculty or students of AAMU shall reside with the inventor or creator of such patent or copyright provided that: (1) there is no use, except in a purely incidental way, of AAMU resources in the creation of such patent or copyright (unless such resources are available without charge to the public); (2) the patent or copyright is not prepared in accordance with terms of any AAMU grant or contract; (3) the patent or copyright is not developed by a research scientist, an academic faculty member or a student as a specific University assignment. The nature and extent of the use of University's resources shall be subject to AAMU's regulations.

## **Other Efforts**

Ownership rights to patentable and copyrightable materials developed under any circumstances other than those listed herein in Section 1.4 of this policy shall be determined on an individual basis and approved by the Vice President for Institutional Research and Sponsored Programs or his/her designated representative. The nature and extent of inventor or creator participation in income shall, however, be set forth as outlined below in Section 1.5, Administrative Procedures.

## **Administrative Procedures**

AAMU is responsible for implementation of the University's Patent and Copyright policy.

AAMU is authorized to seek patent and copyright protection for potential licensing purposes only. The relevant school, laboratory, center, or the individual inventor/creator must fund patent and copyright protection for reasons other than the aforementioned purpose.

Prior to public disclosure or submission for publication, a developer or inventor of intellectual property or creative works shall disclose to his or her Chairperson, Dean and the Vice President for Institutional Research and Sponsored Programs any such property or works upon realization that it has commercial potential suitable for development.

Upon disclosure, the Vice President of Institutional Research and Sponsored Programs will provide the developer/inventor, within thirty (30) days, a strategic plan outlining the proposed University action concerning the disclosure. The Vice President for Institutional Research and Sponsored Programs will adopt a strategic plan only after consultation with the developer(s), Chairperson, and Dean (Or other appropriate unit administrators).

Alabama A&M University may at its sole discretion determine to release its ownership rights in the intellectual property or creative works to a developer/inventor upon conditions the University deems beneficial and fair to all parties. Any such release will be provided in writing to all parties.

AAMU's Vice President for Research & Development, after reporting of the plan and approval by AAMU President, will advise the inventor or creator of AAMU's final decision whether to accept a patent or copyright for administration in writing within ninety (90) days of receipt of the complete patent or copyright disclosure form (Report of Invention). Should AAMU decide not to accept the patent or copyright for administration, or if it at any future time decides not to take any further action in marketing, or encouraging further development as a prelude to marketing, the patent or copyright, it shall notify the inventor(s) or creator(s) within (90) days of receipt of the complete disclosure form or of its later decision to discontinue marketing of its release of the patent or copyright to the inventor(s) or creator(s).

Developers/inventors shall fully disclose to Alabama A & M University any financial and or other relationships that they may have that might affect or encumber the transfer of intellectual property or creative works to any off-campus individual or entity. Before or contemporaneously with disclosure, developers/inventors and all University personnel working on development of the intellectual property or creative work shall sign a standard form of non-disclosure agreement with the University. The non-disclosure agreement form may be obtained from the Office of the Vice President for Institutional Research and Sponsored Programs.

No AAMU personnel shall take any action to seek commercialization of or receive any benefit from any invention other than in accordance with AAMU policy.

After filing and patent expenses have been paid, Two Thousand Five Hundred Dollars (\$2,500.00) of gross income derived from the commercialization of any patent or copyright other than video tapes/multimedia material shall be paid to the inventors/developers. Thereafter, the net income shall be distributed as follows:

INCOME	NEXT \$100k	\$101-500k	\$501-1,000 k	Over \$1 MILLION
INVENTOR	35%	30%	30%	30%
REINVEST	15%	20%	20%	20%
AAMU	50%	50%	50%	50%

In the case of the death of an inventor, any payment due, or which would have been due to such inventor, shall be made to the inventor's estate.

**Net Income**

All licensing income less all expenses attributed to that specific disclosure (e.g. patent costs, attorney costs, marketing costs, reproduction, mailing, consumables, etc.) shall be distributed quarterly by AAMU.

**Inventor**

The inventor will be the inventor or inventors of record listed on the original invention disclosure. When more than one inventor/developer is listed, the allocation will be determined by the percentage of ownership listed in the original invention disclosure. That allocation may be altered for future royalty distribution only by written request signed by all inventors listed on the original invention disclosure. In the case of the death of an inventor, any payment due, or which would have been due, to such inventor shall be made to the inventor's estate.

The inventor must file an application with the U. S. Patent Office within twelve months of disclosure in a publication or of any other action that results in the details of the invention becoming generally available.

## **Reinvestment (Research Performance Incentive)**

Royalty distribution for reinvestment payment will be made in the form of an AAMU grant to the school, unit, or laboratory of the principal inventor/developer for use in funding additional or similar development activities at the unit level.

Reinvestment of funds is intended to seed additional development of new patents and copyrights. Funds will expire eighteen (18) months from the date of the grant.

Reinvestment-fund accounts will be set up for the inventor to use for new research and the development by the individual inventor or developer. In the event the inventor/developer leaves AAMU, the accounts will be managed by AAMU.

### **1.2 Appeals**

AAMU's researchers shall have the right to appeal the decisions of the Patent and Copyright Committee to the Vice President for Institutional Research and Sponsored Programs and the AAMU President

### **1.3 Changes in Policy**

Alabama A&M University may change this policy for Institutional Research and Sponsored Programs on the recommendation of the Patent and Copyright Committee and the approval of the Board of Trustees.

### **1.4 Conflict**

In the event of conflict between this policy and any policy of the Board of Directors, a legal representative shall assist the Patent and Copyright Committee with any legal matter arising out of the AAMU patent program.

## **APPENDIX E**

### **Office of Grants and Contracts Accounting (GCA) Overview**

**A. GCA Mission / Goals / Strategies**

**B. GCA Staff Positions**

**C. GCA Organizational Chart**



## **A. GCA MISSION / GOALS / STRATEGIES**

### **Mission Statement**

The mission of the office of Grants & Contracts Accounting (GCA) is to serve as the financial managers of Alabama A&M University's grants and contracts funding; to serve as a resource to Principal Investigators and Budget Managers in understanding the tracking and reporting of finances.

### **Goals**

1. To provide timely invoicing and financial reporting.
2. To assist Principal Investigators/Budget Managers in financially managing their grants and contracts.
3. To reduce the risk of audit findings due to financial errors, untimely reporting, improper invoicing, etc.

### **Strategies to Achieve Goals**

1. Each grants accountant has been assigned a college(s) and will work to create strong relationships with Principal Investigators, Budget Managers, and departmental staff within their respective college(s).
2. Each grants accountant will work toward becoming knowledgeable of their college's grants and contracts, the corresponding rules and regulations, and the invoicing and reporting requirements of such.
3. Ellucian has been brought in to provide training and implementation support to OSP and GCA in order to more fully utilize Banner software moving forward. The teams will continue to work toward full implementation of the available Banner modules.
4. All GCA staff will continue to attend available training regarding both the Banner software and grants and contracts specific conferences.

GCA staff will implement a quarterly training seminar for departmental staff regarding use of the Banner software for financial tracking, budget vs. actual analysis, etc.

## **B. GCA STAFF POSITIONS DESCRIPTIONS**

### **Position Title: Director of Grants and Contract**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 24

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

### **Summary:**

This position directs all aspects of the Grants and Contract Accounting unit under the Assistant Vice President for Finance. Provide accounting services for sponsored project funds, ensuring compliance with federal, state and local government, sponsor and Alabama A& M University regulations and policies. Monitoring compliance with cost accounting standards, preparing recurring and special reports and analyses, developing and delivering training to departmental employees and to the campus community.

### **Duties and Responsibilities:**

- Provides leadership to the Grants Accounting staff, and training and workshops to the campus constituency
- Assists with cash flow management through the timely and accurate posting of Grants expenditures and the subsequent request for reimbursement.

- Maintains general ledger, subsidiary ledgers and transactions journals for the Restricted federal, state and local current funds
- Performs analyses and reviews of expenditures, encumbrances, cash disbursements, and cash receipts transactions
- Reconciles general ledger control accounts and subsidiary ledgers
- Assists with month-end and year-end close out and financial statement preparation
- Performs A-110, A-21, and A-133 reporting and compliance activities.
- Reviews and approves Grants Accounting journal entries.
- Prepares monthly, quarterly, and annual reports.
- Prepares, reviews and approves invoices for submission to granting agencies
- Insures the timely preparation and submission of reports and invoices
- Assists PI's with inquiries relative to the Grants Accounting process and the facilitation of those grants
- Performs other duties as assigned.

**Minimum Position Requirements (including years of experience, certifications, licenses, etc.):**

A bachelor's degree in accounting and three years of Grants and Contracts Accounting experience or two years of related professional level experience. One year of leadership or supervisory experience is required.

**Essential Functions:**

- A strong foundation and understanding of generally accepted accounting principles
- Knowledge of internal controls relative to finance and accounting processes
- Experience with computer based accounting systems
- In depth knowledge of state and federal regulations and procedures relative to grants processing
- Strong verbal and written communication skills

**Position Title: Grants and Contracts Accountant**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 14

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Summary:**

This is professional accounting work of a routine nature. The position reports to the Director of Grants and Contracts.

**Duties and Responsibilities:**

- Maintains general ledger, subsidiary ledgers and transactions journals for the Restricted federal, state and local current funds
- Performs analyses and reviews of expenditures, encumbrances, cash disbursements, and cash receipts transactions
- Reconciles general ledger control accounts and subsidiary ledgers
- Assists with month-end and year-end close out
- Performs A-110 and A-21 reporting and compliance activities.
- Prepares journal entries.
- Prepares monthly, quarterly, and annual reports.
- Assists in the distributions of reports.
- Prepares Invoices for submission to granting agencies
- Assists PI's with inquiries relative to the Grants Accounting process
- Performs other duties as assigned.

**Minimum Position Requirements (including certifications, licenses, etc.):**

A bachelor's degree in accounting and one year of grants and contracts accounting experience or two years of related professional level experience.

**Essential Functions:**

- A strong foundation and understanding of generally accepted accounting principles
- Knowledge of internal controls relative to business processes
- Experience with computer based accounting systems.
- In depth knowledge of state and federal regulations and procedures relative to grants processing
- Strong verbal and written communication skills

**Position Title: Senior Accountant**

Fair Labor Standards Act (FLSA) Classification: Exempt

Grade: 17

The following statements are intended to describe the general nature and level of work that is to be performed in the identified position. The statements are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified as other duties may be assigned.

**Summary:**

This is professional accounting work of a complex nature. Supervision is received from the chief accountant.

**Duties and Responsibilities:**

- Maintains general ledger, subsidiary ledgers and transactions journals for the general fund, and agency fund. Performs analysis and reviews of expenditures, encumbrances, cash disbursements, and cash receipts transactions.
- Reconciles general ledger control accounts and subsidiary ledgers.
- Assists with month-end and year-end close out.
- Distributes bookstore, supply store, printing and duplication, job orders, and telephone charges. Prepares journal vouchers.
- Performs chart of accounts file maintenance.
- Assists in the preparation of monthly, quarterly, and annual reports.
- Assists in the distributions of reports.
- Performs other duties as assigned.

**Minimum Position Requirements (including certifications, licenses, etc.):**

A bachelor's degree in accounting and two year professional level experience in accounting or auditing work.

**Essential Functions:**

- Proficiency in accounting principles and techniques.
- Considerable knowledge of governmental accounting and college and university administration.
- Some knowledge of systems of internal control.
- Some knowledge of computer based accounting systems.
- Some knowledge of applicable state and federal regulations and procedures.
- Ability to communicate ideas and information.

**C. GCA ORGANIZATIONAL CHART**

