



PROVIDENCE  
COLLEGE

Developed in collaboration between the Divisions of Academic Affairs and Finance and Business to highlight the College's procedures and policies impacting sponsored projects and research compliance

# Policies and Procedures for Sponsored Projects and Research Compliance

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**Policies and Procedures for  
Sponsored Projects and Research Compliance at Providence College**

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**Policies and Procedures for  
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# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## I. GLOSSARY OF TERMS

**Allocable Costs** - Those allowable costs that actually benefit the grant or contract to which they are charged.

**Allowable Costs** - Those categories of costs that are allowable as a charge on a grant or contract as determined by the terms and conditions of the award and/or appropriate cost principles.

**Certain types of costs, such as the cost of alcoholic beverages are not allowable and may not be charged to a contract or grant.**

**Audit** - A formal examination of an organization's or individual's accounts or financial situation. An audit may also include examination of compliance with applicable award terms, laws, regulations and policies.

**Authorized Organizational Representative (AOR)** – The person authorized to sign proposals and accept awards on behalf of the College.

**Award** - Funds that have been obligated by a sponsor for a particular project.

**Budget** - A list of anticipated project costs that represent the Principal Investigator's best estimate of the funds needed to support the work described in a grant or contract proposal.

**Budget Description (or Justification or Narrative)** - A written description of the cost estimation methods used in preparing a budget that also explains or describes the types of individual costs that make up a larger budget category.

**Budget Period** - The interval of time--usually twelve months--into which the project period is divided for budgetary and funding purposes.

**Budget Adjustment** - The act of amending the budget by moving funds from one category or line item to another. (See also Rebudget.)

**CDC** - Centers for Disease Control and Prevention

**CFDA** - Catalog of Federal Domestic Assistance

**CFR** - Code of Federal Regulations

**CITI** – Collaborative Institutional Training Initiative, Provider of web-based training materials on research education content

**Close Out** - The act of completing all internal procedures and sponsor requirements to terminate or complete a research project.

**COGR** - Council on Governmental Relations

**Competing Renewal Proposal** - Proposals (for ongoing projects) that must compete again if the term of the original award has expired.

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**Conflict of Interest** - Situations in which employees use their positions for purposes that are, or give the appearance of being, motivated by a desire for private gain for themselves or others, such as those with whom they have family, business or other ties.

**Consortium Agreement** - Group of collaborative investigators/institutions; arrangement can be formalized with specified terms and conditions.

**Contract** - A mechanism for procurement of a product or service with specific obligations for both sponsor and recipient. Typically, a research topic and the methods for conducting the research are specified in detail by the sponsor, although some sponsors award contracts in response to unsolicited proposals.

**Contracting Officer** - A sponsor's designated individual who is officially responsible for the business management aspects of a particular contract. The contracting officer is responsible for all business management matters associated with the review, negotiation, award, and administration of a contract and interprets the associated administration policies, regulations, and provisions.

**Copyright** - An intangible, incorporeal right granted by statute to an author or originator of certain literary or artistic productions, where he/she is invested, for a limited period, with the sole and exclusive privilege of multiplying copies of the same and publishing and selling them. Works of authorship include literary, musical or dramatic works, works of art, motion pictures or video tapes, audio recordings or computer programs.

**Cooperative Agreement** - An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation, and anticipates having substantial involvement in research activities once the award has been made.

**Cost Accounting Standards (CAS)** - Federally mandated accounting standards intended to ensure uniformity in budgeting, accounting and reporting project costs.

**Cost-Reimbursement Type Contract/Grant** - A contract/grant for which the sponsor pays for the full costs incurred in the conduct of the work up to an agreed-upon amount.

**Cost-Sharing** - A general term, used as a noun or adjective, that can describe virtually any type of arrangement in which more than one party supports research, equipment acquisition, demonstration projects, programs, institutions. Example: A university receives a grant for a project estimated to have a total cost of \$100,000. The sponsor agrees to pay 75% (\$75,000) and the university agrees to pay 25% (\$25,000). The \$25,000 is the cost-sharing component.

**Data Use Agreement (DUA)** – A contractual agreement used for the transfer of non-public data that is subject to some restriction on its use, serves to outline terms and conditions of the transfer and addresses limitations on use of data, obligations to safeguard the data, liability for harm arising from use of the data, publication, and privacy rights that are associated with transfers of confidential or protected data.

**DHHS** - Department of Health and Human Services

**Direct Costs** - Clearly identifiable costs related to a specific project. General categories of direct costs include but are not limited to salaries and wages, fringe benefits, supplies, contractual services, travel and communication, equipment, and computer use.

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**DOD** - Department of Defense (includes Air Force, Army, ARPA, and Navy)

**DoED** - Department of Education

**Effort** - The total activity or work for which an individual is compensated by the College. Expressed as a percentage of the full time equivalence (FTE).

**Extension** - An additional period of time authorized by the sponsor (or awardee institution, as appropriate) to an organization for the completion of work on an approved grant or contract. An extension allows previously allocated funds to be spent after the original expiration date.

**Facilities and Administrative (F&A) Costs** - F&A costs are synonymous with Indirect Costs. See Indirect Costs

**FDP** - Federal Demonstration Partnership is a cooperative effort between a number of universities and federal agencies to increase research productivity by eliminating unnecessary administrative procedures and by streamlining and standardizing needed controls.

**Final Report** - The final technical or financial report required by the sponsor to complete a research project.

**Fiscal Year (FY)** - Any twelve-month period for which annual accounts are kept. The federal government's fiscal year is October 1 through September 30. PC's is July 1 through June 30.

**Fixed-Price (FP) Contract/Grant** - A contract/grant for which one party pays the other party a predetermined price, regardless of actual costs, for services rendered or the delivery of a final product/report. Quite often this is a fee-for-service agreement.

**Fringe Benefits** - Employee benefits paid by the employer. (e.g., FICA, Worker's Compensation, Withholding Tax, Insurance, etc.)

**Funding Cycle** - Range of time during which proposals are accepted, reviewed, and funds are awarded. If a sponsor has standing proposal review committees (or boards) that meet at specified times during the year, application deadlines are set to correspond with those meetings. For some sponsors, if proposals are received too late to be considered in the current funding cycle, they may be held over for the next review meeting (i.e., National Science Foundation's Target Dates).

**Grant** - A type of financial assistance awarded to an organization for the conduct of research or other program as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the awarding office anticipates no substantial programmatic involvement with the recipient during the performance of the activities.

**Grants Officer** - A sponsor's designated individual who is officially responsible for the business management aspects of a particular grant or cooperative agreement. The grants officer is responsible for all business management matters associated with the review, negotiation, award, and administration of a grant or contract and interprets the associated administration policies regulations, and provisions (For definition of scientific officer, see Program/Project Officer).

**Grants Routing Form** - An internal routing form used at PC for securing institutional approvals prior to submitting a proposal to a sponsor for funding consideration.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

**IACUC (Institutional Animal Care and Use Committee)** - A faculty committee charged with reviewing and approving the use of animal subjects in all research projects. The IACUC serves as an institutional compliance committee and is responsible for reviewing reported instances of regulatory noncompliance related to the use of animal subjects in research.

**IBC (Institutional Biosafety Committee)**- An IBC is responsible for reviewing projects that involve, but are not limited to, recombinant DNA, RNAi, pathogens, human materials and other potentially infectious material, as well as transgenic animals.

**In-Kind** - Contributions or assistance in a form other than money. Equipment, materials, or services of recognized value that are offered in lieu of cash.

**Incremental Funding** - A method of funding grants and contracts that provides specific spending limits below the total estimated costs. Each increment is, in essence, a funding action.

**Indirect Costs (IDC)** - Costs related to expenses incurred in conducting or supporting research or other externally-funded activities but not directly attributable to a specific project. General categories of indirect costs include general administration (accounting, payroll, purchasing, etc.), sponsored project administration, plant operation and maintenance, library expenses, departmental administration expenses, depreciation or use allowance for buildings and equipment, and student administration and services.

**Indirect Cost Rate** - The rate, expressed as a percentage of a base amount (MTDC), established by negotiation with the cognizant federal agency on the basis of the institution's projected costs for the year. At PC, indirect costs are applied to a modified total direct cost (MTDC) base. The indirect cost rate is charged on a set of direct costs known as an indirect cost base.

**Intellectual Property** – A new creation, such as patentable inventions, new processes, written compositions, computer software, new chemical compounds, music, other artistic creations, new forms of plants or animals, or any copyrightable subject matter. Intellectual Property is granted legal aspects of a property right, including patents, copyrights, and trademarks.

**Investigator-Initiated Proposal** - A proposal submitted to a sponsor that is not in response to an RFP, RFA, or a specific program announcement.

**IRB (Institutional Review Board)** - A faculty committee charged with reviewing and approving the use of human subjects in all research projects. The IRB serves as an institutional compliance committee and is responsible for reviewing reported instances of regulatory noncompliance related to the use of human subjects in research.

**Key Personnel** - Personnel considered to be of primary importance to the successful conduct of a research project. The term usually applies to the senior members of the project staff; however, sponsors may have differing definitions of Key Personnel.

**Letter of Inquiry (LOI)** - A brief description, usually 2-10 pages, of research plans and estimated budget that is sometimes submitted to determine the interest of a particular sponsor prior to submission of a formal proposal. Also termed Pre-proposal or preliminary proposal.

**Line Item Budget** - A budget that lists the cost of personnel participating in a project as well as itemizes the costs for all other budgeted categories such as travel, supplies, equipment, etc. Itemization may be required in varying degrees of detail.

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**Materials Transfer Agreement (MTA)** – Contract that governs the transfer of tangible biological and research materials between two organizations, when the recipient intends to use it for his or her own research purposes, defines rights, obligations, and restrictions of the provider and the recipient with respect to the materials and any derivatives, and any confidential information exchanged with the material.

**Memorandum of Understanding (MOU)** – A nonbinding agreement between two or more parties outlining the terms and details of an understanding, including each parties' requirements and responsibilities.

**Misconduct in Science** - Fabrication, plagiarism, falsification or destruction of data, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. It does not include honest error or honest differences in interpretations or judgments of data.

**Modification** - An award document that modifies any aspect of an existing award other than those named above. Example: Carryover approvals, adding or deleting special terms and conditions, changes in funding levels (administrative changes initiated by the agency, extensions that include changes in terms, change of principal investigator, etc.)

**Modified Total Direct Costs (MTDC)** - At PC, the basic indirect costs are calculated on a subset of direct costs, normally excluding among other costs, equipment, space rental, alterations and renovations, and subcontract costs in excess of the first \$25,000.

**NCURA** - National Council of University Research Administrators

**NEA** - National Endowment for the Arts

**NEH** - National Endowment for the Humanities

**New Award** - An award not previously awarded or a renewal or continuation award treated as a new award by the sponsor and given a new agency number.

**NIH** - National Institutes of Health

**No Cost Extension** - An extension of the period of performance beyond the expiration date to allow the principal investigator to finish a project. Usually, no additional costs are provided.

**Non-Competing Continuation Proposal** - A continuation proposal reports on progress made during a portion of the project period and requests continuation funding for the next portion of the project period. Continuation proposals do not compete with new project proposals and are not subjected to peer review beyond the initial project approval.

**Non-Disclosure Agreement (NDA)**- An NDA also known as a confidentiality agreement, is a legal contract between at least two parties that outlines confidential material, knowledge, or information that the parties wish to share with one another for certain purposes, but wish to restrict access to or by third parties.

**Notice of Grant Award** - The legally binding document that serves as a notification to the recipient and others that a grant or cooperative agreement has been made; contains or references all terms of the award; and documents the obligation of funds.



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**NSF** - National Science Foundation

**OMB** - Office of Management and Budget

**PAPPG** – Proposal & Award Policies and Procedures Guide for National Science Foundation

**Peer Review** - A system using reviewers who are the professional equals of the principal investigator or a program director who is to be responsible for directing or conducting the proposed project. It is a form of objective review. Peer review is legislatively mandated in some programs and in other programs is administratively required.

**PHS** - Public Health Service

**PHS 2590** - Application for Continuation of a PHS Grant (National Institutes of Health)

**PHS 398** - Application Form for a PHS Grant (National Institutes of Health)

**Principal Investigator (PI)** - The individual responsible for the conduct of research or other activity described in a proposal for funding. The Principal Investigator is responsible for all programmatic and administrative aspects of a project or program.

**Prior Approval** - The requirement for written documentation of permission to use project funds for purposes not in the approved budget or to change aspects of the program from those originally planned and approved. Prior approval must be obtained before the performance of the act that requires such approval under the terms of the agreement.

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

**Program Announcement** - Describes existence of a research opportunity. It may describe new or expanded interest in a particular extramural program or be a reminder of a continuing interest in an extramural program.

**Program/Project Officer** - Sponsor's designated official responsible for the technical, scientific, or programmatic aspects of a particular grant, cooperative agreement, or contract. Serving as the counterpart to the principal investigator/project director of the grantee/contractor organization, the program/project officer works with the grantee/contractor organization staff to assure programmatic progress.

**Progress Report** - Periodic, scheduled reports required by the sponsor summarizing research progress to date. Technical, fiscal, and invention reports may be required.

**Project Period** - The total time for which support of a project has been programmatically approved. A project period may consist of one or more budget periods. (Also see Budget Period.)

**Proposal** - An application for funding that contains all information necessary to describe project plans, staff capabilities, and funds requested. Formal proposals are officially approved and submitted by an organization in the name of a principal investigator.

**Rebudget** - The act of amending the budget by moving funds from one category or line item to another. (See also Budget Adjustment)

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

**Regulations** - The contractual rules and procedures governing sponsored research projects.

**Regulatory Noncompliance** - Failure to adhere to regulations, policies, procedures or special conditions related to the conduct of research. Examples of such noncompliance include, but are not limited to, failure to obtain/maintain approval for research; coercion of human subjects; performing unapproved procedures; and conducting research at unapproved sites.

**Renewal** - Applicable to grants and cooperative agreements only. A competitively reviewed proposal requesting additional funds extending the scope of work beyond the current project period.

**Request for Applications (RFA)** - Announcements that indicate the availability of funds for a topic of specific interest to a sponsor. Proposals submitted in response to RFAs generally result in the award of a grant. Specific grant announcements may be published in the Federal Register and/or specific sponsor publications.

**Request for Proposal (RFP)** - Announcements that specify a topic of research, methods to be used, product to be delivered, and appropriate applicants sought. Proposals submitted in response to RFPs generally result in the award of a contract. Notices of federal RFPs are published in the Commerce Business Daily.

**Request for Quotations (RFQ)** - A formal request to vendors for a price quotation on equipment or supplies to be purchased.

**Revised Proposal** - A modified and resubmitted request for funding for a project that was previously not funded either because it was denied by the sponsor or withdrawn by the principal investigator.

**Salaries and Wages (S&W)** - Payments made to employees of the institution for work performed.

**Scope of Work** - The description of the work to be performed and completed on a research project.

**Senior Personnel** - Professional personnel who are responsible for the scientific or technical direction of project.

**SpinPlus** – Sponsored Funding Opportunity Database. Tools are provided that gear towards both individual and administrative users, and **SPIN** provides both active searching as well as automated, daily opportunity notifications.

**Sponsor** - The organization or entity that funds a research project.

**Sponsored Research** - Research conducted by College employees using any College space, facilities, materials, equipment, or property, and which is financed by contract payments, grants, or gifts from any source other than the College's funds.

**Sponsored Projects and Research Compliance (SPaRC)**

**SRA** - Society of Research Administrators

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**Stipend** - A payment made to an individual under a fellowship or training grant in accordance with pre-established levels to provide for the individual's living expenses during the period of training.

**Subcontract, Subgrant, or Subagreement** - A document written under the authority of, and consistent with the terms and conditions of an award (a grant, contract or cooperative agreement), that transfers a portion of the research or substantive effort of the prime award to another institution or organization. **Subs** - Short for subcontractors.

**Task Order Agreement (TOA)** - A legally binding document authorizing work and appropriating funds as a supplement to a basic contract or master agreement.

**Teaming Agreement** - An agreement between two or more parties to participate in a research project or teaching activity.

**Terms of Award** - All legal requirements imposed on an agreement by the sponsor, whether by statute, regulation(s), or terms in the award document. The terms of an agreement may include both standard and special provisions that are considered necessary to protect the sponsor's interests.

**Time and Effort Report** - A report that reflects an after-the-fact reporting of the percentage of activity (effort) of each employee. Each report must account for 100% of the activity for which the employee is compensated and which is required in fulfillment of the employee's obligations to the institution. The report must reasonably reflect the percentage of effort applicable to each sponsored agreement, and to other institutional activities. Each report must be signed by the employee and by a responsible official having first-hand knowledge of the work performed.

**Total Direct Costs (TDC)** - The total of all allowable direct costs of a project.

**Total Project Costs** - The total allowable direct and indirect costs incurred by the institution to carry out an approved project or activity.

**Unallowable Costs** - Unallowable costs are specific categories of costs that cannot be charged, directly or indirectly, to federally sponsored agreements in accordance with Federal regulations.

**Uniform Guidance**- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards-Office of Management Budget 2 CFR 200

**Unsolicited Proposal(s)** - Proposals submitted to a sponsor that are not in response to an RFP, RFA, or program announcement. (See also Investigator-Initiated Proposal.)

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## II. PREAWARD

### Principal Investigator Eligibility & Assurances

#### Background:

Grants and contracts are awarded to the College; therefore, it is in the College's interest to ensure that projects are led by qualified principal investigators. Principal investigators must have the technical competence and administrative capacity to assume responsibility for successfully accomplishing all aspects of the project.

#### Which faculty are permitted to submit a proposal for sponsored research through Providence College?

Any member of the ordinary faculty is normally allowed to serve as principal investigator on funding proposals and contracts. Term faculty (adjunct, visiting professor, research associate, special lecturers, practitioner faculty) may be allowed to submit a proposal if the planned grant activities commence and terminate within the term of his/her respective appointment. Faculty holding Emeritus status may be allowed to submit proposals at the discretion of the director of sponsored projects and research compliance and the provost & senior vice president of academic affairs.

All proposals will follow the grants routing procedure for approval.

#### May others be PI(s) on sponsored research/programs?

In cases where grant proposals seek to develop curricula, programming, or institutional change and impacts, College administrators (typically at the level of Director or above) may serve as PI. Grant proposals should be discussed with the relevant divisional vice president. Proposals will be reviewed to determine alignment with College goals and objectives.

#### Assurances:

When a Principal Investigator/Project Director signs the grants routing sheet, s/he assures:

- that s/he will take responsibility for the technical content and quality of the proposed project .
- that the project and other professional activities and the College mission are compatible.
- that the information contained in the grant application is true, accurate and complete to the best of his/her knowledge.
- that s/he acknowledges and is responsible for compliance with award terms and conditions and College policies and procedures, particularly for the technical conduct of work, submission of technical reports, regulatory compliance, and financial management if an award is made.

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- that arrangements have been made to fund any cost sharing or other special resources needed to conduct the work.
- that no false , fictitious or fraudulent statements or claims are made.
- that s/he has not been debarred or suspended from doing government-sponsored work.
- that if a Financial Conflict of Interest exists, that it will be disclosed according to College policy.

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### **Corporate & Foundation Relations vs. Sponsored Projects and Research Compliance (SPaRC)**

#### **Which office (Corporate & Foundation Relations or Sponsored Projects and Research Compliance) will handle the submission of a grant proposal?**

- IF proposal is to a government agency, THEN Sponsored Projects and Research Compliance.
- IF proposal is to a private entity, BUT the original source of funding is a government agency (e.g., Federal funds flowing through a University or other non-profit), THEN Sponsored Projects and Research Compliance.
- IF proposal is to a private entity for non-governmental funds, BUT the project is primarily for support of an individual faculty member's research, THEN Sponsored Projects and Research Compliance. (Sponsored Projects and Research Compliance will check with Corporate & Foundation Relations to clear there are no conflicts with other outstanding requests.)
- IF proposal seeks support of an individual donor, THEN Corporate & Foundation Relations will connect the proposer with the proper person within Institutional Advancement.
- IF proposal is to a private entity for non-governmental funds for a project that is a priority of institutional leadership, THEN Corporate & Foundation Relations.
- ...and if it's not clear, Sponsored Projects and Research Compliance and Corporate & Foundation Relations work closely together to figure out which office is better positioned to handle the given proposal.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Limited Submissions**

#### **Background:**

Some funding programs limit the number of submissions that can be made at any one time from the College. Therefore, we have established the following guidelines so that all concerned will be treated fairly. Remember, if Providence College submits more than the allowable number of proposals in a limited submission program, it is likely that all proposals from Providence College will be disqualified!

#### **Procedures:**

In cases in which a sponsor allows only a limited number of proposals to be submitted, Providence College will select proposals according to the following process.

1. Approximately six weeks before the application deadline, will solicit letters of intent to apply and a brief project justification from each prospective applicant.
2. The applicants' materials will then be forwarded to a review committee for review and ranking. The review committee composition will be determined based upon the competition under consideration.
3. Sponsored Projects and Research Compliance will notify all candidates of their status. If the first candidate should decide to forego applying, then Sponsored Projects and Research Compliance team will notify the alternate candidates.
4. The nominees should work with Sponsored Projects and Research Compliance to complete the proposals.

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## Grants Routing & Approval Process

### Use of the Grants and Contracts Routing Sheet

Any grant or contract project that is solicited from a source outside the College by an employee of the College is to be processed with a [grants routing sheet](#) available on the Sponsored Projects and Research Compliance Internal Portal Site. The routing sheet is a mechanism to assure all required institutional endorsements have been obtained so that the College can accept funds for the intended project or purpose. Failure to properly complete the Routing Sheet may result in delays in processing project funds or may jeopardize whether the College will accept and/or approve the project.

Do **NOT** use the grants routing form for:

- a. gifts of cash, equipment and/or in-kind services. (Institutional Advancement/Corporate foundation and Relations has the appropriate forms for routing of gifts and contributions.)
- b. projects supported solely by intramural (campus) funding (*e.g.*, CAFR, etc.).

### Funds from Private Sources

If the funds are from private sources (*e.g.*, foundations and corporations), the Director of Sponsored Projects and Research Compliance will coordinate with the Director of Corporate/Foundation Relations so that your proposed funding source can be reviewed for outstanding College requests.

### Routing of Grant Proposals and Authorized Signatures

#### Why route proposals?

To ensure that federal and state guidelines are met and that the intellectual and academic objectives of the College are maintained, all proposals for external funding must be reviewed at appropriate administrative levels prior to submission. The College will better be able to track, coordinate, support and ensure compliance with regulations if each and every proposal for external support is coordinated and supported through a central office.

#### When should you contact SPaRC?

As soon as you start thinking about applying for a specific grant opportunity you should contact SPaRC at [research@providence.edu](mailto:research@providence.edu). It is important to start this process early! SPaRC can be helpful in strategizing about the proposal and assisting with administrative portions of a proposal. SPaRC likes to hear from faculty early and often. The routing sheet and proposal must be received far enough in advance of the mailing date to allow each signing individual to review the proposal, as well as make suggestions and corrections. It is recommended that **five working days** be allowed for SPaRC to process and mail/electronically submit the proposal. If there are special circumstances (research risks approval, matching funds, collaborative projects,



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subcontracts, space commitments, information technology resources required, conflict of interest, etc...), earlier consultation with SPaRC should occur to avoid delays in proposal review and submission.

### **What should be done prior to routing a proposal?**

Prior to routing the proposal, please be sure to check with your department chair, dean and/or others with regard to released time, support services, equipment, cost-sharing, information technology resources and use of facilities. Transition to post-award implementation is smoother when discussions related to the impact of your sponsored research or program are coordinated and planned in advance. If your proposed project involves any curricular changes or additions, you must go through the normal procedure for curricular approval.

### **What is required at the time of routing?**

- 1) The proposal routing sheet;
- 2) Final budget and justification;
- 3) Near final proposal narrative;
- 4) Institutional letters of commitment or other certification forms requiring authorized signature.

The authorizing official's signature cannot be affixed to the final proposal until the College approvals are obtained. Proposals which are submitted without College approval and result in an award may be rejected, withdrawn, or otherwise not supported by the institution.

### **Who signs the routing sheet?**

1. Principal Investigator
2. Department Chair/Program Director
3. School Dean (or Vice President for administrative departments)

Once the above signatures are obtained by the PI, the routing form and supporting documents are sent to the SPaRC. SPaRC reviews\* and secures the final signatures and will submit the proposal on behalf of the College.

4. Financial Services
5. SPaRC Director (Authorized Organizational Representative)

\*Please note that SPaRC does not normally review the content of the technical part of the proposal that deals with specific areas of knowledge unique to each discipline as that would require in-depth knowledge of the field. However, in cases where grant proposals involve curricula or institutional change or impacts, the proposal will be reviewed to determine alignment with College goals and objectives.

### **What else is there to know about signature authority on grants/contracts/agreements?**

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A Principal Investigator (PI), Project Director (PD), Department Head, or other faculty or staff employees of the College should never sign a grant proposal, grant or contract on behalf of Providence College. For a contract to have validity and enforceability, it must be signed by the person with specific delegation to sign on behalf of the College. Therefore, if a grant proposal or award is NOT signed by the correct person, the contract, grant, agreement, proposal or application is void and unenforceable.

# **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

## **Federal Subaward Policies and Subrecipient Monitoring Guidelines**

The purpose of this document is to communicate Providence College’s guidelines pertaining to the programmatic and financial monitoring of its federally sponsored award subrecipients. A subrecipient is a third-party organization performing a portion of Providence College’s sponsored project. The terms of Providence College’s subrecipient relationships are documented in subaward agreements (also referred to as subrecipient agreements). Providence College uses the Federal Demonstration Partnership (FDP) model for its subaward agreements.

In accordance with the requirements contained within Title 2, Part 200 of the Code of Federal Regulations (2 CFR 200), hereinafter referred to as Uniform Guidance (UG), Providence College is required to perform a series of monitoring efforts to ensure proper stewardship of federal funds. Those efforts include subrecipient/subaward vs consultant/contractor distinction, performing preaward subrecipient review and monitoring the programmatic activities of subrecipients throughout the life of each federal subaward. Subawards are also subject to additional federal agency-specific regulations established by the prime sponsor.

These procedures were developed to comply with the Uniform Guidance requirements. These requirements will involve monitoring efforts from Financial Services (FS), Sponsored Projects and Research Compliance (SPaRC), and Principal Investigators (PIs). These procedures don’t preclude additional monitoring efforts if there is any question about the subrecipient’s ability to ensure proper use and financial management of federal funds during any stage of the award.

### **PRE-SUBAWARD REQUIREMENTS**

#### **Subrecipient versus Contractor/Consultant Determination (SPaRC with FS)**

- Perform analysis based on UG criteria and statement of work supplied by PI and determines whether the organization to receive federal funds under the project should be classified as subrecipient or contractor/consultant.
- Subaward versus Consulting It is often difficult to determine whether certain outside services needed by a grant project should be treated as a consultant or as a subaward.

The following chart will be used to guide the determination.

Subaward Agreement	Consulting Agreement
Given to colleges and universities, other institutions and organizations;	Given to independent contractors (individuals) or consulting organizations for professional services;
Makes substantial contributions to the project that may not be reduced to a set price per unit;	Tasks are specific, well-defined and of limited scope;

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Often has more autonomy in the completion of the work, within the parameters of the agreed-upon work plan, timeline, and budget;	Services are primarily advisory in nature and address a clearly delineated problem;
Has responsibility for programmatic decision making;	Generally do not use institutional or organizational facilities;
Has its performance measured against whether the objectives of the project are met, and ;	Provides similar goods and services to many different purchasers, and;
Has responsibility for adherence to applicable program compliance requirements.	Are not subject to compliance requirements of the grant program.

\* This guidance is informed from A Guide to Managing Federal Grants for Colleges and Universities; the National Council of University Research Administrators and 2 OMB CFR 200 .

### **Determine if Cost Reimbursable or Fixed Amount Subaward (SPaRC with Financial Services)**

- Cost reimbursable subawards will be used in most cases.
- Fixed amount subawards may only be used with prior written approval of the Federal awarding agency up to the Simplified Acquisition Threshold (currently \$150K)

### **Pre-Subaward Review (SPaRC Responsible)**

A pre-subaward review is required in the case of a subaward under a federally sponsored project subject to the requirements of 2 CFR 200 (Uniform Guidance), unless there is a current review for the organization which has been conducted in the last 12 months). SRP will keep an excel spreadsheet tracking the subaward review date, entity, and risk level.

If a current review exists, note the expiration date of the review in the pre-award file and use it – this satisfies the requirement of pre-subaward review and no further steps are required. If there’s no review on file, or it’s expired, the following procedures need to be performed.

- All Sub recipients will complete a Providence College Subrecipient Commitment Form.
- Determine Assessment Path (Federal Single Audit [formerlyA-133] or Financial Questionnaire)
  - o **If subrecipient is subject to the Federal Single Audit**
    - Go to the Federal Audit Clearinghouse (FAC) and download the subrecipient’s most recent report (most recent report should be within nine months of the end of the subrecipient’s most recent fiscal year.)

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- Review the report to see if there are findings that related/potentially related to Providence College subawards. If there are findings that relate to Providence College subawards, the subaward may be determined to be elevated risk. If there are no findings, the entity will be designated low risk.
- **If subrecipient is not subject to a Federal Single Audit**
  - SPaRC will review the Subrecipient Commitment Form. In addition to asking financial, accounting, internal controls, and banking questions, the questionnaire also requests that various related documents be provided.
  - SPaRC reviews the completed questionnaire, financial statements, and documents and assigns a risk category of low or elevated. If an elevated risk category is assigned, the subaward will be subject to additional monitoring after the award is issued.

### **Risk Review Categories**

There are two risk levels at Providence College: Low Risk or Elevated Risk

1. **Low Risk:** Those with a Federal Single Federal Audit without findings related to the subaward will be designated Low Risk.
2. **Elevated Risk:** SRP reviews subrecipient monitoring package. Additional Factors/Considerations which may elevate Risk Level
  - Length of working relationship and or previous experience with entity
  - Scope of the project
  - A negative response to the Subrecipient Commitment Form
  - No Single Audit
  - Single Audit with findings on Federal Grants

#### **Elevated Risk Entities: Potential additional items required:**

- Detailed budget including typical functional expense categories and indirect costs to be included in subagreement.
- Additional statement requiring the submission of detailed supporting data for amounts invoiced.
- Very detailed scope of work
- Subrecipient monitoring discussion with PI, FS, SPaRC (meeting or call)
- Requirement of supporting documentation/back up at the post-award stage.

### **Determine Indirect Cost Rate (SPaRC & FS Responsible)**

- **If subrecipient has a current Federally-approved indirect cost rate (IDC) agreement**
  - Review the current rate information and ensure the correct rate is used on the subaward budget.

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- Ensure rate is applied to Modified Total Direct Costs (MTDC) consistent with Federal standards.
- **If subrecipient does not have a current Federally-approved IDC rate agreement**
  - If the subrecipient elects not to negotiate an IDC rate, or agreement cannot be reached on a rate, use the de minimis rate of 10 percent applied to MTDC.

### **POST AWARD REQUIREMENTS**

#### **Receipt and Review of Subrecipient Invoices (FS and PI Responsible)**

- FS will receive invoices from the subrecipient. If certain information is missing, FS will inform PI for resolution.
- FS will check to ensure the invoice has, at a minimum, expenses broken down by budget category and that the expenses were incurred during the authorized budget period of the subaward. If the invoice does not have the minimum requirements, the invoice will be returned to the subrecipient for correction. If the invoice is acceptable, FS will send to the PI for approval. The PI and FS must both approve and sign invoices.
- The PI reviews and certifies to: allocability, allowability, indication of required cost sharing, reasonableness of costs, costs are within invoiced period, etc. as stated in standard certification/concurrence. The PI also certifies that the programmatic and financial aspects of the subaward's progress are being monitored and are acceptable to the PI.

#### **Programmatic Monitoring (PI Responsible)**

- The PI is the individual with the ultimate responsibility for the administrative and programmatic aspects of the project including ensuring funds are spent in accordance with university and sponsor guidelines.

#### **Annual Single Audit Reports (formerly A-133 Reports) and Financial Reviews**

- If the subrecipient is subject to the federal Single Audit:
  - Annual Single Audit reports are obtained and reviewed only for Single Audit organizations which have one or more Providence College subawards active during the period covered by the audit.
  - SPaRC will obtain the most recent Single Audit Report from the Federal Audit Clearing House.
  - SPaRC and FS will review the Single Audit Report and update the College Subrecipient Spreadsheet with a risk category of "low" or "elevated".
  - If the risk assessment changes (either from low to elevated, or from elevated to low), the new risk assigned to the organization applies to all active project

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subawards for this particular organization, and the new risk level will be used for new subawards as they are issued.

- For every instance where there are findings that relate to the subaward, PC must document PC's management decisions in a management letter. This letter should then be sent to the Single Audit auditee organization. A copy should be kept on file.
  
- If the subrecipient is not subject to the federal Single Audit:
  - All /non-Single Audit subawardees are required to provide annual information consisting of a) updated completed questionnaire and b) most recent financial statements, if available. PC receives the documents, reviews for completeness, and updates the risk category on the College Spreadsheet (either low or elevated).
  - If the risk assessment changes (either from low to elevated, or from elevated to low), the new risk assigned to the organization applies to all active project subawards for this particular organization, and the new risk level will be used for new subawards as they are issued.
  - Each non-Single Audit organization will only provide one updated completed questionnaire with financial statements each year regardless of how many PC subawards that particular subawardee may have.

### **Instructions for including Subawards in a proposal budget**

A subaward is a contractual document that conveys a portion of a project's scope of work to another organization. The other organization's budget must be included as part of the proposal package. If you plan to include a subaward in your proposal budget, the subrecipient must provide prior to proposal submission:

1. A sufficiently detailed scope of work/work schedule;
2. A detailed budget which complies with the funder's budget requirements and restrictions, the budget should accurately reflect the costs of completing the accompanying scope of work;
3. The PC Subrecipient Commitment Form and documentation signed by an authorized official. The form is located on the PC Internal Portal.

### **Instructions for including Consultants in a proposal**

If you plan to use a consultant in your proposal, please obtain a letter of commitment from the consultant prior to proposal submission which outlines:

1. The nature of the consulting/advisory services to be provided for the particular project;
2. The amount of time committed, and;
3. The fee structure (i.e. X dollars per day or per hour)

### **Instructions for entering Subrecipient and Consultant Agreement on grant awards**

Once an award is made which requires a subaward or consultant agreement, contact SPaRC for assistance in developing the agreements. Providence College uses a Research Consultant Agreement and Subaward Agreement Template as the base of these agreements which have been approved by the College's General Counsel. Only an AOR of the Institution may sign a subrecipient or consultant agreement on behalf of the College.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Course Release Policy & Course Buy-out Procedures**

The expectations for tenure-eligible and tenured (i.e. ordinary) faculty are that they will teach a full load of courses, typically 3-3, while continuing to conduct scholarly activity and service. A course release is when a faculty member is permitted to have a reduced teaching load under their normal academic year appointment. In other words, the person is “released” from **part of** their teaching obligation while still being paid their regular full time salary. Course release should not be confused with professional leave, which occurs when a faculty member is released from **all** teaching, scholarship and service opportunities to pursue a scholarly activity or to take a fellowship. The College recognizes there may be circumstances where an exceptionally large piece of scholarly or administrative work necessitates a reduction in workload to accomplish the activity.

#### **Requesting a course release for sponsored research and scholarly activity:**

Faculty members may request a course release in order to concentrate their efforts on grant-supported scholarship. The request should be made in writing via e-mail to the department chair/program director, school dean and Provost & Senior Vice President for Academic Affairs at the time of proposal development. The detailed request should include: 1) the size and scope of work to be conducted and rationale as to why a course release is necessary to complete the scope of work; 2) the sponsor which will provide funding, and; 3) the anticipated semester (s) in which a course release is requested.

After conferring with the department chair/program director and school dean, the approval for course release is made by the Provost & Senior Vice President for Academic Affairs. The approval is made on condition that the release will be granted if an award is made and the course release time has been budgeted according to the course buy-out procedures. The faculty member works with the Office of Sponsored Projects and Research Compliance to budget for a course “buy out” in the proposal to an external sponsor.

#### **Limitations:**

- Normally, the maximum number of courses a faculty member may request release from teaching for the purpose of conducting sponsored scholarly work is one per academic year. In no case may a faculty member be released from more than two courses per academic year (one per academic semester) for the purpose of grant-related scholarship.
- A faculty member who receives a course release may not receive concomitant overload pay.

When the above approvals are followed, departments/programs may be authorized to hire special lecturers through the normal hiring process for replacement purposes.



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### **Course Buy-Out Procedures**

A “buy-out” means that a course release has been given so the faculty member can work on a sponsored grant. The corresponding percentage of the person’s appointment is charged directly to the grant account during the term of the buy-out. In effect, the grant “buys” the faculty member’s released time by paying for that portion of his/her salary so that the equivalent amount of effort can be spent working on the grant. Standard practice for determining the cost of a course release, and a method consonant with federal grants, is to calculate the cost based on a percentage of the faculty member’s salary (the individual for whom the course is bought out) rather than the replacement cost for the course.

### **Basic definition of faculty work profile for the purpose of sponsored research course buy out:**

60% Teaching; 40% Research and Service

At a standard load of 6 courses per academic year, one course equals 10%

### **Calculation Example:**

For a course buy-out funded by an external grant or contract, the buyout is 10 percent of the base academic-year salary plus fringe benefits. For example, a faculty member with a base salary of \$65,000 would budget as follows: AY salary \$65,000  $\times$  .10 = \$6,500 plus fringe benefits at 34% \$2,210 = \$8,710 (cost for one course buy-out)

### **Post Award Procedures:**

When course release has been approved and course buy out is budgeted and approved by the external sponsor, the external grant will be charged a percentage of the faculty member’s time and associated fringe benefits. Faculty must certify through the College’s time and effort reporting procedures that time charged is an accurate and a reasonable estimation of time devoted to the sponsored activity.

# **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

## **Cost Sharing or Matching**

Generally, Providence College prefers to avoid cost sharing. Any cost sharing commitment must be included on the Grants Routing Form and in the proposed budget. The responsible College officials must identify the source of institutional funds and approve the cost sharing commitment on the Grants Routing Form. Any committed cost sharing must be documented within the College's financial system. Providence College will provide cost sharing or matching only when it is required or encouraged in the funding opportunity announcement.

Cost sharing is defined as institutional support of a share of the total cost of a project. An example of 50% cost sharing on a project with a total cost of \$100,000 is the institution must pay \$50,000 and the sponsor will pay \$50,000 to cover the total costs of \$100,000. Matching is defined as sponsor required matching of funds in support of a project. An example of a 50% match of a \$100,000 proposed request to a sponsor would require the institution to match \$50,000 to amount to total costs of \$150,000.

### **Criteria for Cost Share or Match**

To be acceptable for use as cost sharing or matching, expenditure must satisfy the following criteria:

- Be verifiable from official Providence College records;
- Not be used as cost sharing for any other sponsored program;  
Be necessary and reasonable for proper and efficient accomplishment of project objectives;
- Be allowable under the applicable cost principles, 2 CFR 200 Uniform Guidance;
- Be itemized in the approved budget; and
- Be incurred during the effective dates of the grant or contract.

### **Acceptable Expenditures**

In general, costs normally treated as direct costs on sponsored projects may be used to meet a cost sharing or matching obligation. Costs normally treated as indirect on sponsored projects may not.

### **Sources of Cost Share or Match**

Cost sharing or matching may be met from the following sources:

- College funds or effort may be used as cost share or match when they are provided for the benefit of the specific project.
- Unfunded indirect costs may be used as cost share or match when the sponsor does not reimburse indirect costs at the full rate due to sponsor policy, government legislation, or terms of the agreement. If the difference is to be used as cost share or match, it must be approved by the sponsor.
- Third-party contributions (support from a non-College source) may be used as cost share or match if committed in writing by the third party.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

- Federal funds may never be used as cost sharing or matching on other federally-sponsored projects.

### **Cost Share or Match Commitments at Proposal Stage**

1. The project director shall secure required cost share or match commitments early in the proposal development stage and document appropriately in the proposal budget and narrative.
2. The project director shall secure written approval on the Grants Routing Form from the individuals responsible for the organization code from which cost share or match is committed.
3. The department chair and dean (or equivalent supervisors in administrative units) shall review the proposal and Grants Routing Form to identify and approve any committed cost share or match.
4. Sponsored Projects and Research Compliance shall review the proposal to identify any committed cost share from the College. If cost share or match is committed, SPaRC shall ensure that appropriate cost share documentation has been included with the Grants Routing Form, including the organization code for the cost share or match funds and written approval from the individual responsible for the organization code.

### **Cost Share or Match Commitments at Award Stage**

1. If the award amount is less than the proposed budget, SPaRC shall work with the project director to determine whether the college has incurred a cost sharing or matching obligation beyond what was committed in the proposal. If additional cost share or match obligations are incurred at the award stage, written approval shall be obtained from the individuals responsible for the funds to be used as cost share or match.
2. SPaRC shall review award conditions and ensure that required cost share or match is committed and identified prior to acceptance of the award.
3. SPaRC shall provide documentation of the award and a budget that identifies sponsor funding and cost share or match commitments to Financial Services.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Equipment and Real Property Management**

Providence College compiles an inventory of equipment that was acquired with federal grant funds. The inventory is comprised of all equipment with an acquisition cost of \$5,000 or greater per the Uniform Guidance.

The inventory consists of all equipment purchased from 7/1/10 to the present and is updated as purchases are made. Equipment is tagged to indicate that it was purchased with federal funds.

**Responsible Parties:** The Director of Financial Analysis and Budgets in Financial Services is responsible for completing the equipment inventory every 2 years along with the tagging of equipment as it is acquired with Federal funds.

**Responsibility of Principal Investigators:** Principal Investigators must notify the Director of SPaRC if/when items listed in the equipment inventory:

- a) is moved either temporarily or permanently to a new location;
- b) is damaged;
- c) is obsolete.

The Director of SPaRC will coordinate updating the inventory and making determinations on appropriate and allowable disposal or redeployment of the federally-sponsored piece of equipment.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Negotiation and Acceptance of Awards**

The Director of SPaRC will work with the Principal Investigator to review the terms and conditions of grant award or contract. The Director will work with the sponsoring agency to negotiate undesirable or unacceptable terms and conditions when determined necessary. Once terms and conditions are agreeable to Providence College, the Director of SPaRC will sign as Authorized Organizational Representative (AOR), and then ensure that Financial Services receives a copy of the award letter and other pertinent information necessary for creation of an organization number.

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## III. POSTAWARD

### Financial Post Award Procedures

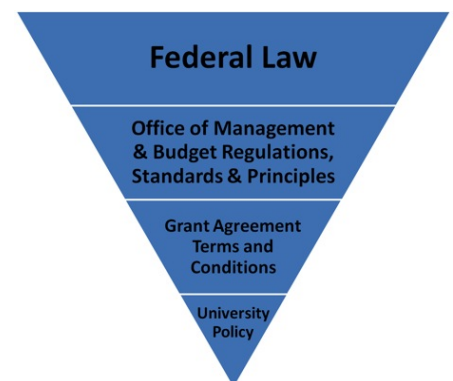
- A. Creation of an Organization Number  
Financial Services will create an “Organization Number” for awards accepted by Providence College and which require separate accounting and fiscal reporting. The PI will use this organization number for approved expenditures in the grant budget. Advance accounts are not typical at Providence College. Projects with compliance restrictions (e.g. human or animal subjects, RCR mandated training, biohazards etc.) will not be allowed to spend funds on those activities until institutional approvals are received.
- B. Submission of Grant-Related Expenses  
Faculty use the College’s normal procedures for incurring costs and expenditures. Faculty members spend against the approved sponsor budget. All expenses must be incurred within the period of the grant award. Pre-award expenses are not customarily allowable without written sponsor approval.
- C. Allowable Expenses  
Under CFR 200.403-405, Allowable expenses are defined as those which are **reasonable and necessary** and allocable to sponsored projects. A cost is reasonable if it is necessary to complete the project and a prudent businessperson would have purchased the item and paid that price. A cost is allocable if it is incurred solely to advance the work under the sponsored agreement. **Alcohol and entertainment costs are never an allowable expense for a sponsored agreement. Other unallowable costs includes: lobbying costs, fundraising, memberships, fines and penalties, cash donations.** Some sponsors have additional limitations (i.e. NEH does not allow any food to be charged to an award). It is important to consider the precedence of policies and regulations in making a determination of allowability.

Sponsored Projects and Research Compliance, The Principal Investigator and Financial Services at Providence College share some responsibility of ensuring allowability and allocability of costs. The primary responsibility is on the Principal Investigator.

\*The ultimate responsibility of allowability rests on the PI to ensure that all items charged to their grants are allowable, reasonable and allocable. PIs are provided with a Notice of Award by SPaRC outlining the budgeted expenses, budget limitations, and prior approvals for a given award. Providence College Notice of Awards are project specific.

\*A responsibility of Sponsored Projects and Research Compliance is to ensure that all project budgets are developed and submitted to sponsors in accordance with the college, sponsor, and federal policies. Staff in SPaRC are trained

Figure 1 Precedence of Regulations



## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

through the National Council of University Research Administrators and up to date on College and Sponsor requirements.

\*A responsibility of Financial Services is to review and approve purchase orders on sponsored projects to ensure the costs are allowable, reasonable, and allocable. Financial Services also prepares monthly reports which are distributed to PIs and SPaRC. PIs are responsible for reviewing these reports to ensure expenses are appropriate and in line with the approved sponsor budget.

### **D. Re-budgeting**

Different sponsors have varying rules and regulations related to re-budgeting grants. Prior approval from the sponsor is often required for re-budgeting. The PI, along with SPaRC, will make requests for re-budgeting to the sponsor as necessary and share sponsor approval with Financial Services.

### **E. Cost-Transfer**

A cost transfer is a transfer of expenditure from one project to another project. Although it is ultimately the Principal Investigator's responsibility to ensure the fiscal and programmatic management of an award or contract, Financial Services facilitates this endeavor by providing timely, comprehensive and accurate fiscal reports of all awards and contracts. Errors should be identified by the PI as soon as possible.

Cost transfers should occur within 90 days from the original charge with written justification. Should the identification of an error exceed 90 days additional justification may be required. The 90 day cost transfer time limit applies when transferring expenses TO a sponsored grant or contract. No time limit exists for REMOVING expenditures from a federally sponsored grant or contract. If inappropriate expenditures are discovered on federal projects, they must be removed without regard to time limits.

### **F. No-Cost Extensions**

An extension is needed to an agreement to spend beyond the end date of a grant. In many cases a sponsor may grant a no-cost extension, which extends the project's length without additional funds added. A PI should alert the SPaRC at least 60 days prior to the end date of an award when a no cost extension will be needed. The request for a no-cost extension must include the scientific/programmatic reasons for the delay in project completion. Simply having funds left and available in the budget is not a sufficient reason to request a no-cost extension. SPaRC will request extensions from the sponsor. Financial Services will be notified by SPaRC when an extension is planned and when it is granted.

### **G. Purchase Requisitions**

All Purchase Requisition for grants and sponsored agreements are reviewed and approved by Financial Services against the approved grant budget and sponsor regulations. Vendors paid with federal funds must not be debarred or suspended from receiving federal funds. Financial Services will check the Excluded Parties List System (EPLS) prior to authorizing purchase orders.

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All purchases with a value of \$5,000 or greater must attach a Federal Procurement Documentation Form available on the Sponsored Projects and Research Compliance Internal Portal Site to the purchase order. At least two (2) vendor quotes are required for these purchases to ensure the costs to be reasonable. If two vendor quotes are not possible, a sole source justification must be provided on the Federal Procurement Documentation Form. Additionally, PIs must certify that there is no conflict of interest with a vendor. For items \$5,000 or greater, those items are added to the College's Equipment inventory.

For items over the simplified acquisition threshold (currently 250,000), a sealed bid process (if the entity has very specific parameters for the purchase) or a competitive proposal process will apply. The PI will work with the PC purchasing department on such a process.

Equipment may not be ordered to simply use unobligated funds at the end of the grant period. Equipment purchases during the last 6 months of a project will require additional justification from the PI. This may include:

- Confirmation of whether the PI will be requesting an extension.
- Expected receipt date of equipment.
- A programmatic justification as to why the equipment was not necessary until the last six months of the award.

### **H. Travel on Grants**

All travel must follow the College's normal faculty travel policies and procedures. In addition to those policies, those with federal awards must adhere to the "Fly America" act and ensure all international travel is purchased through an American flag carrier, even if it costs more money.

### **I. Invoicing of Grants**

Financial Services invoices sponsors for approved direct and indirect costs incurred on grants. Invoicing is conducted in accordance with the given sponsor agreement.

In the case of subawards, Financial Services would receive and pay invoices related to subawards after determining the service/good was received and acceptable per the PI.

### **J. Financial/Project Reporting**

Principal Investigators are responsible for timely progress reporting on their sponsored agreements. Financial Services handles financial reporting to the sponsor and draw down of funds. In cases where progress and financial reporting must be coordinated, the PI should be in contact with Financial Services. PIs must complete timely progress reports. Some sponsors like the National Science Foundation restrict all funding to an institution when a progress report is late or missing. PIs who fail to meet reporting requirements by the sponsor may be prohibited by the Director of SPaRC from submitting new proposals if progress reports are outstanding. A copy of the progress report should be submitted to SPaRC and to Financial Services upon completion as auditors often request to see documentation of timely project reporting of federal



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funds. In cases where progress reports must be submitted electronically through Research.Gov or NIH e-commons, the SPaRC is the authorized submitter or signing official of these reports on behalf of the College.

### **K. Records Retention**

The college retains financial records of the accounting of every sponsored agreement for the minimum required by the sponsor or three years from the project's completion, whichever is longer. Data and project records also need to be retained for inspection by the sponsors for the same length of time.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Budgeting and Hiring Personnel on Grants**

#### **New Hires:**

PIs may build in new hires into grant proposals if a new hire is necessary for the conduct of the work. All College Policies & Procedures for new hires must be followed, as grant funding is merely a source of funding. The position should be necessary for the conduct of the work and allocable to the grant. The PI writes new positions into grants and not particular individuals. Conversations with the Department Chair and School Dean should occur prior to grant submission, particularly regarding issues of space/integration of duties into departmental activities.

#### **Postdoctoral Researchers (Faculty Status):**

- If the proposed hire is a faculty position, PI and SPaRC must work with the Senior Executive Assistant in Academic Affairs (AA) to review job description and salary prior to submitting a grant proposal.
- The NIH postdoc salary chart will be used to determine pay for post-doc position: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-17-002.html>
- Postdocs receive the same benefits as all Visiting faculty at Providence College. NO pension is offered. S/he can choose either medical or dental coverage but not both.
- The cost of benefits should be budgeted at 34% in grant proposals, although the College can/will charge actual costs to the grants. Actuals vary depending on individual employee elections.
- If/when the grant is funded, the Senior Executive Assistant in Academic Affairs (AA) is the point of contact for hiring the position. Please note that credentials for faculty positions must be vetted through the respective School Dean.

#### **Staff Positions:**

##### **Full Time - 12 months +**

- If the proposed position is a full time staff position, SPaRC and the PI will work with the Associate Director for HRIS/Classification & Compensation Specialist in Human Resources (HR) to establish the appropriate pay range and title. The PI should develop a job description for the proposed position for this assessment.
- Grant-funded full time staff positions receive the same benefits as all staff in the employee class.
- The cost of benefits should be budgeted at 34% in grant proposals, although the College can only charge actual costs to the grants. Actuals vary depending on individual employee elections.

##### **Part Time or Full Time (Temporary) - under 12 months**

- Faculty may build in hourly/temporary staff positions into grant proposals. The rate of pay should be commensurate with similar positions/nature of the work.
- Any position (whether full or part time) which is less than 12 months does not receive benefits. Associate Director for HRIS/Classification & Compensation Specialist in Human Resources (HR) should be consulted on pay rates.
- FICA at 7.65% is budgeted and assessed.
- If/when the grant is funded, The HR Generalist – Talent Acquisition and Retention (HR) will be contact person on hiring a staff person.

## Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

- Appointment letters are coordinated with SPaRC and Financial Services to ensure any special terms of the grant are included.

### **Budgeting Pay Increases:**

#### **Full Time Staff (12+ months):**

- While a PI may budget standard cost of living pay increases into a grant proposal, actual pay increases per year are based on the grade of the position the employee is in and where their performance lands within that range. The standard increment pay increase for budgeting purposes will be estimated at 3%. Actual pay increases will vary.
- Positions that are 12+ months will be hired as graded positions, receive performance reviews, and receive raises consummate with the College's pay scale.

#### **Part Time or Full Time (Temporary) under 12 months**

- Temporary positions (less than 12 months) are not eligible to be graded positions and thus not eligible for pay increases.

#### **Postdoctoral Researchers**

- Postdoctoral positions will typically follow the standard NIH pay scale. This includes increases each year based on numbers of years of experience. The Provost & Senior VPAA has final authority on faculty position salary.

### **Employee End Dates:**

- HR will monitor employee end dates to ensure we do not have an over payment issue. PIs should notify HR if employees terminate earlier than anticipated.

### **Hiring Undergraduates:**

- Undergrad researchers' salaries determined by Financial Aid Office. Positions are estimated in budgets as hourly positions (currently \$10.10 per hour) with 7.65% FICA.
- After graduation, an undergrad finishing up a particular project is treated as a temporary employee, then would continue making the same rate of pay plus FICA at 7.65%.

### **Point of Contact at Providence College**

*All hires and payments must follow Providence College Procedures.*

*You should contact:*

Contacts for	Dean	Provost	Human Resources	Financial Services	Financial Aid
<b>Faculty</b>					
<i>Course Buyout</i>	X	X			
<i>Summer Salary payments on grants</i>				X	
<i>Hiring Faculty Postdocs</i>	X	X			
<b>Staff</b>					
<i>Position Classification</i>			X		
<i>Hiring Staff</i>			X		
<i>Search Process</i>			X		
<b>Fringe Benefits</b>					

## Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

Contacts for	Dean	Provost	Human Resources	Financial Services	Financial Aid
<b>Faculty</b>					
Eligible Benefits			X		
<b>Students</b>					
Place Students on Payroll					X

### Tax Withholding Information

*\*In rare cases, sponsors may limit payment of certain benefits or have different withholdings (case in point Americorp VISTA does not withhold federal taxes). If there are exceptions to any of the standard items noted below imposed by a Sponsor, Sponsored Projects and Research Compliance will communicate with HR in advance of the hire.*

Pay Source	Grant-Funded/Salaried
Fed Taxes	Withheld
State Taxes	Withheld
Social Security and Medicare	Withheld
TDI (Temporary Disability Insurance)	Withheld
Worker's Compensation	Covered
Individual contributions for medical and dental premiums	Post or Pre-Tax Withholding
Employee benefits other than health and dental insurance	<b>Visiting Faculty/Postdoc</b> - Only eligible for health or dental <b>Staff</b> – Eligible for all benefits (including sick and vacation)

### Fringe Benefit Rates for Budgeting

<b>All full time staff and postdoctoral associates (faculty)</b>	<b>34%</b>
<b>All temporary staff/hourly staff</b>	<b>7.65%</b>
<b>Undergraduate Students</b>	<b>7.65%</b>

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Time and Effort Reporting**

Adherence to the College's Time and Effort Reporting policy is necessary to prevent cost disallowances and penalties by the federal government and other sponsoring agencies.

The correct allocation of personnel charges to the appropriate activity/account is important in the management of the College's resources and is especially significant to the College's compliance with federal guidelines. As a condition of receiving funding from the federal government, the College is required to maintain and certify the percentage of effort employees devote to externally-sponsored projects. The College's effort reporting system is an after-the-fact confirmation requiring the completion of a Time and Effort Certification Form.

Faculty and professional staff shall complete effort reports at least three times per year (end of fall semester, end of spring semester, and end of the summer). Hourly staff shall complete time sheets to certify their effort. The Time and Effort Certification Form is distributed and collected by SPaRC. Summer compensation for sponsored program work will not be initiated for faculty who have outstanding time and effort reports.

The Time and Effort Certification Form shall:

- reasonably reflect the percentage distribution of time and effort expended by faculty and professional staff involved in externally-sponsored projects.
- be completed and signed by each faculty and professional staff working on an externally-sponsored project. Faculty and staff must document the time and effort spent on the project regardless of whether the sponsor pays for the time or the time is cost-shared by Providence College.
- not be completed for employees who submit time sheets.
- be confirmed by a person having firsthand knowledge of the employee's activities. Confirmation is indicated by a countersignature on the form.
- be held in Financial Services with the official post-award grant files.

# **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

## **Charging and Distribution of Indirect Costs**

Indirect costs, commonly called overhead costs, are real costs. They are by their nature difficult to assign to any one specific project without extensive cost accounting procedures. Federal granting agencies and most non-governmental entities recognize the existence of such costs. Examples of these costs include: (a) the costs of using the buildings and equipment; (b) accounting, personnel, standard computing, and purchasing expenses; (c) general mail, printing, and duplicating expenses; (d) library services; and (e) administration.

Providence College will apply the maximum allowed indirect costs to all grants and this amount should be included in all grant application budgets. Any exception to applying the full overhead rate will require the approval of the Department Chair, School Dean, Senior Financial Analyst, and Provost & Senior Vice President for Academic Affairs. Approval is indicated when signatures are affixed on the grant routing sheet.

The College's current federally negotiated indirect cost rate is a percentage of Modified Total Direct Costs (MTDC). Please contact SPARC to obtain the current rate which must be used for federal proposals. Many foundations, as well as state agencies, also allow overhead costs to be added to grants, 10% should be charged, when allowed.

### **Distribution of Indirect (Overhead) Funds**

With an understanding and appreciation that it takes the contribution and effort of many to ensure the success of sponsored research and programs, the College will distribute indirect costs recovered from an external grant to further recognize, support, and stimulate sponsored research and programs as follows:

- Principal Investigator/Project Director (10%)
- Principal Investigator/Project Director Home Department/Program (25%)
- School Dean or relevant Vice President (25%)
- Sponsored Projects and Research Compliance (10%)
- Providence College's General Fund (30%)

Because overhead funds are awarded to the institution, Providence College reserves the right to change this policy at any time or to make exceptions to it on an individual basis. For example, the distribution of the department/program share of indirect costs of a faculty member with a joint appointment will be determined at the time of proposal submission. If the award specifies that the project is affiliated with a center or institute, the departmental/ program portion (25%) will be directed to the named center/institute, rather than the Principal Investigator/Project Director's home department/program. If faculty members from more than one department/program are involved in the research project, the department/program of the lead Principal Investigator will receive the funds.

### **Guidelines for Implementation of the Policy**

The funds returned to the Principal Investigator/Project Director's, departments/programs/centers/institutes, the School Deans and/or Vice Presidents, and the Sponsored Projects and Research Compliance office can be used for a variety of purposes to

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

further recognize, stimulate, and support sponsored research. Examples of appropriate uses include, but are not limited to, seeding new projects; providing matching funds; attending conferences; hiring research assistants; supporting research-related dissemination and publication; purchasing equipment, supplies and materials, and/or; traveling to meet with program officers. These funds are not to be used for augmenting faculty or staff salaries.

In an effort to promote meaningful and purposeful use of the funds, the Banner Org where recovered indirect costs are distributed will be cumulative and roll forward from one fiscal year to the next.

In the event that a PI separates from Providence College, unused discretionary funds revert back to the College's General Fund.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Financial Close-out Procedures**

Large, unjustified expenditures during the final month of a grant are often red flags for auditors. In order to facilitate the capture of all direct and indirect costs associated with an award or contract, PIs are expected to review monthly financial reports on a timely basis throughout the award period. All materials and services needed for the conduct of the project must be received and accounted for prior to the end date of the award. When the project is complete, a final financial report will be prepared according to the timeline and specification of the particular sponsor. Any remaining or unspent funds will be remitted to the sponsor, unless otherwise indicated in a sponsor agreement or communication.



**Policies and Procedures for  
Sponsored Projects and Research Compliance at Providence College**

## **IV. RESEARCH COMPLIANCE POLICIES**

### **Misconduct in Research**

**Background:**

Providence College is committed to setting a behavioral standard of appropriate research conduct among all of its faculty, staff, and students. The College fosters a research environment that promotes responsible research activities, condemns misconduct, mandates good-faith reports of misconduct, and takes reasonable and effective steps to protect good-faith reporters, witnesses, and committee members from inappropriate breaches of confidentiality and retaliation.

The grievance policy and procedures to be followed by Providence College in case of possible research misconduct by any member of the Providence College community whose research is funded by the US Department of Health and Human Services, as described in the Public Health Service Policies on Research Misconduct, 42 CFR Parts 50 and 93, also known herein as the final rule was established and approved July 21, 2010.

The [Misconduct in Research Policy](#) is available on the Academic Affairs Website.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Responsible Conduct in Research**

**Background:** Responsible Conduct in Research (RCR) is critical for Providence College's faculty and students. With or without federal mandate the institution would embrace the opportunity to ensure that students and faculty are responsibly and ethically conducting research.

**THE NIH:** According to the NIH's notice "Update on the Requirement for Instruction in the Responsible Conduct in Research" Notice Number: NOT-OD-10-019, dated 11/24/09, upon award of any NIH Institutional Research Training Grants, Individual Fellowship Awards, Career Development Awards, Research Education Grants, Dissertation Research Grants or other grant programs with a training component that requires instruction in responsible conduct in research as noted in the Funding Opportunity Announcement, a formal training program which includes at least 8 hours of contact hours (face to face engagement) between faculty and trainees is required. This training program should be provided throughout the trainees' scientific career and should occur as an undergraduate, graduate and post-doc student, as well as during Career Awards and other milestones in a scientist's career.

Providence College provides resources to assist in this effort. The on-line training certificate program Collaborative Institutional Training Initiative (CITI) is available to faculty to assist in the development of a training program. The modules included in CITI can be used to guide and augment responsible conduct in research training in addition to face to face didactic interactions with students. Adequate training will include the following components:

- a. Conflict of interest: personal, professional, and financial
- b. Policies regarding human subjects, live vertebrate animal subjects in research and safe laboratory practices
- c. Mentor/mentee responsibilities and relationships
- d. Collaborative research including collaborations with industry
- e. Peer review
- f. Data acquisition and laboratory tools; management, sharing and ownership
- g. Research misconduct and policies for handling misconduct (please see PC's policy)
- h. Responsible authorship and publication
- i. The scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research.

**THE NSF:** Pursuant to the 2007 America COMPETES Act, the National Science Foundation adopted a certification requirement effective January 4, 2010. The NSF Grant Proposal Guide states: "When submitting a proposal to NSF, the Authorized Organizational Representative is required to complete a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research." The plan must also include a system to verify that the training has occurred. The plan does not have to be submitted with proposals, but NSF could request it at any time – and NSF could audit compliance. Currently, institutions are free to develop their own plans, and at present there are no NSF-recommended models.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

1. Faculty Principal Investigators (PIs) have the primary responsibility for training the students involved in their NSF-funded research. The Grants Routing Form requires a signature from any PI who submits an NSF proposal. This signature indicates that the PI agrees to participate in appropriate RCR training.
2. RCR (Responsible Conduct of Research) training will be required for all undergraduates receiving wages (or working as volunteers) or receiving academic credit for participating in NSF-funded research. Training must be completed within the semester or summer that the student begins work on the NSF-funded research.
3. RCR training will be documented at the project-level by the PI. Each PI will keep a list of students involved in NSF research and the date of RCR completion.

RCR training will include the following components:

a) Each student must successfully complete the appropriate Collaborative Institutional Training Initiative (CITI) module of RCR training. This requirement can be waived for students who have successfully completed an RCR workshop at another institution designed to satisfy NSF's training requirement or other comparable training; the Director of Sponsored Projects and Research Compliance will specify what constitutes appropriate documentation in these cases.

b) PIs meet with the student/trainee throughout the training program and reinforce the RCR concepts presented in CITI.

To access the RCR training modules, please go to <http://www.citiprogram.org> to complete the registration and follow the instructions for RCR training. Please contact Sponsored Projects and Research Compliance if you encounter any problems.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Policy of Use of Human Subjects in Research (IRB)**

The mission of the Providence College Institutional Review Board is to ensure that all research conducted at the College, and/or by agents of the College (i.e., faculty, students, staff), adheres to federal policies regarding the protection of human research participants. The PC IRB is responsible for reviewing all research involving human participants: to determine whether the rights, dignity, freedom, welfare and privacy of participants are protected; to determine whether any risks are outweighed by potential benefits; to determine whether informed consent is obtained by adequate and appropriate methods; and to ensure that unforeseen adverse consequences are reported in a timely and appropriate manner. The IRB works collaboratively with investigators to promote the responsible and ethical conduct of scholarship involving human research participants.

Standard Operating Procedures of the IRB can be found at the [IRB website](#).

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Institutional Animal Care and Use**

If your research involves vertebrate animals, your research protocol must be approved by Providence College's Institutional Animal Care & Use Committee. Please contact SPaRC for more information on the IACUC. No research with animals may commence on campus without approval of the IACUC.

#### **Providence College's Compliance Statement with OLAW required IACUC/Grant Congruence:**

Proposals to federal agencies which include research using vertebrate animals require IACUC approval prior to the start of a grant project. The Office of Sponsored Research & Programs will share the portion of the grant application that describes the use and care of vertebrate animals with the IACUC Chair prior to the start of a grant project. The IACUC Chair will review what is written in the grant to the corresponding IACUC protocol to ensure that the grant application and IACUC protocol are congruent. If the IACUC protocol and the grant application have significant deviations, the IACUC Chair and Director of Sponsored Projects and Research Compliance will seek clarification from the Principal Investigator to establish congruence. The federal sponsor must be notified if there is a significant deviation from what is proposed in the grant application from what the IACUC ultimately approves. When notification of a federal sponsor is necessary, the Director of Sponsored Projects and Research Compliance will coordinate the notification with the Principal Investigator and IACUC Chair.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Biosafety & Hazardous Materials**

The Environmental Health & Safety Office is the office to notify and coordinate with related to research involving hazardous materials. Additionally, biosafety is important to Providence College. The EH&S office coordinates an institutional biosafety committee which reviews protocols using biohazards. SPaRC works with EH&S. For more information, contact the environmental health and safety officer, [Gregg Meyers](#).

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## Financial Conflict of Interest

### **Background:**

In accordance with Public Health Service (PHS) regulation 42 CFR Part 50, Subpart F *Responsibility of Applicants for Promoting Objectivity in Research* and consistent with the provisions of the National Science Foundation (NSF) NSF 60 FR 35820, Providence College has developed the following policy on financial conflict of interest (FCOI) for investigators applying to or holding grants from federal sponsors, including but not limited to, the National Institutes for Health and the National Science Foundation. Since the initial promulgation of the PHS regulations in 1995, the issuance of a final rule to amend the regulations was issued in the Federal Register August 25, 2011. An institution applying for or receiving PHS funding from a grant, contract, or cooperative agreement must be in full compliance with the revised regulatory requirements. The regulation “promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of research funded under NIH grants or cooperative agreements will be free from bias resulting from investigator financial conflicts of interest.”

**Scope.** The following statement of the policy applies to Providence College investigators applying to or holding grants from federal sponsors.

### **Definitions:**

**Conflict of Interest:** A set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest.

**Investigator:** The term investigator means the principal investigator, co-principal investigators/co-project directors and any other person at the institution responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by the federal government.

**Significant Financial Interest (SFI) Definition:** Financial interests of the investigator (and those of investigator’s spouse and dependent children) that reasonably appear to be related to investigator’s institutional responsibilities.

SFI includes:

- any payments received from the entity within the 12 months preceding the disclosure, when aggregated, exceeds \$5,000; OR
- any equity in a publicly-traded entity that, as of date of disclosure, exceeds a value of \$5,000 (stocks, stock options or other ownership interests); OR
- any equity in a privately-held entity, regardless of actual value.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

SFI does **NOT** include:

- Salary, royalties or other remuneration paid from the College;
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- Income from mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions of vehicles;
- Income from advisory panels or committees for federal, state or local government agencies.

**Financial Conflict of Interest (FCOI):** FCOI is a SFI that could directly and significantly affect the design, conduct, or reporting of federally sponsored research.

### **Guidelines:**

1. Each investigator is required to disclose the following Significant Financial Interests:
  - a. Any significant financial interest of the investigator that would reasonably appear to be affected by the research or educational activities funded, or proposed for funding, by an external sponsor; or
  - b. Any significant financial interest of the investigator in an entity whose financial interest would reasonably appear to be affected by the research or educational activities funded, or proposed for funding, by an external sponsor.
2. Each investigator who has a significant financial interest requiring disclosure shall complete a *Financial Interest Disclosure Form*. The completed disclosure form must be submitted with the proposal and the Providence College grants routing sheet to the director of sponsored projects and research compliance.
3. As required by federal regulations, all significant financial interests must be disclosed prior to the time a proposal is submitted. All financial disclosures must be updated by investigators during the period of the award, either on an annual basis or as new reportable significant financial interests are obtained.
4. The director of sponsored projects and research compliance shall perform an initial review of all financial disclosures to determine whether an actual or potential conflict of interest exists. An actual or potential conflict of interest exists when the review reasonably determines that a significant financial interest could directly affect the design, conduct, or reporting of the proposed sponsored project. If the initial determination is made that a conflict of interest exists, the disclosure package will be referred to the provost & senior vice president for academic affairs. The provost & senior vice president for academic affairs shall determine what conditions or



## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

restrictions, if any, should be imposed by the institution to manage actual or potential conflicts of interest arising from disclosed significant financial interests.

5. Prior to consideration by the provost & senior vice president for academic affairs, the investigator, in cooperation with the College, shall develop and present a Conflict of Interest Resolution Plan that details proposed steps that will be taken to manage, reduce, or eliminate any actual or potential conflict of interest presented by a significant financial interest. At a minimum the resolution plan shall address such issues as:
  - a. Public disclosure of significant financial interests;
  - b. Review of research protocol by independent reviewers; and
  - c. Monitoring of research by independent reviewers.

The provost & senior vice president shall review the resolution plan and approve it and add conditions or restrictions which may include any of the following:

- a. Modification of the research plan;
  - b. Disqualification from participation in all or a portion of the research funded;
  - c. Divestiture of Significant Financial Interests; or
  - d. Severance of relationships that create actual or potential conflicts of interest.
6. An approved resolution plan shall be incorporated into a Memorandum of Understanding (MOU) between Providence College and the investigator that details the conditions or restrictions imposed upon the investigator in the conduct of the project or in the relationship with the business or entity. The MOU shall be signed by the investigator, department chair or program director, school dean, and the provost & senior vice president for academic affairs.
7. The director of sponsored projects and research compliance will certify that actual or potential conflicts of interests will be satisfactorily managed, reduced, or eliminated in accordance with these guidelines prior to expending any funds from the applicable federal award, or they will be disclosed to the sponsored agency for action.

### **Collaborators:**

All collaborators from other institutions paid as sub-recipients of federal grant funds must provide certification that their institutions are in compliance with federal policies regarding Significant Financial Interest disclosure and that their portion of the project is in compliance with their institutional policies.

### **Records:**

Records of the investigator, financial disclosures, and of actions taken to manage actual or potential conflicts of interest shall be retained by Sponsored Projects and Research Compliance until three (3) years after the termination or completion of the award to which they relate, or the resolution of any government action involving those records, whichever comes later.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Violations:**

Whenever an investigator has violated this policy or the terms of the MOU, the provost & senior vice president for academic affairs shall recommend sanctions. If the COI violation results in a proceeding under the College policy regarding scientific misconduct, then the provost & senior vice president of academic affairs shall defer a decision on COI sanctions until the scientific misconduct process is complete.

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## Export Controls

### Providence College's Compliance with Export Control Regulations

Over the past few years the Federal government has become increasingly involved with protecting information and technology from disclosure by universities, the release of which could hamper U.S. economic vitality or contributes to the military potential of U.S. international adversaries. Export laws and regulations promulgated by the U.S. Department of Commerce, the U.S. Department of State and the Treasury Department's Office of Foreign Assets Control are the bases for restricting use and access to this information and technology. These laws impact research, foreign travel and the transfer of technology and information to certain countries. The laws also impose severe criminal and civil fines for noncompliance. It is important that all persons involved in sponsored research understand the regulations and implementation requirements.

Below is an overview of the Department of Commerce's ITAR and EAR regulations, the Office of Foreign Assets Control embargoes, Principal Investigator responsibilities, examples for PC faculty and staff, penalties for non-compliance and important links for further information.

### Overview of ITAR and EAR

Export Control is regulated by the Department of Commerce's Export Administration Regulations (EAR) and by International Traffic in Arms Regulations (ITAR). These regulations control the export of commodities, software, technical data, and information to foreign countries.

Export commonly refers to the shipment or transmission of items, services, or technical data out of the United States however, under EAR and ITAR export can also refer to the release of technology or software technical data to a foreign national in the United States (deemed export). Software or technical data is considered released for export through:

- visual inspection by foreign nationals of equipment and facilities that originated in the United States;
- oral exchanges of information in the United States and abroad; or,
- the application to situations abroad of personal knowledge or the experience acquired in the United States.

EAR uses the regulations in the Commerce Control List maintained by the Bureau of Industry (BIS) and Security that includes items, commodities, software, and technology subject to the authority of BIS. ITAR regulations focus on the export of defense articles and defense services and use a list of categories called the U.S. Munitions List.

ITAR and EAR cover items of U.S. origin, such as

- equipment
- chemicals
- biological substances
- other materials

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

- software code
- computers

ITAR AND EAR issues usually do not pertain when your research and the information you are working with:

- is in the public domain;
- is not encrypted software;
- does not have sponsor restrictions on publication; and/or
- is not related to space or missile technologies, military technologies or military applications.

An export license may be required before a controlled item or material may be exported. A license could take 3-6 months to acquire. For example, you cannot ship computers to restricted countries without licenses. There are severe penalties for noncompliance.

In addition to ITAR and EAR, the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. OFAC prohibits payments or providing anything of value to sanctioned countries, nationals of some countries and specified entities.

OFAC also prohibits travel to and other activities with embargoed countries and entities. In general OFAC “trumps” export controls. The countries where U.S. policy is normally to deny licenses is: Afghanistan, Belarus, Burma, China, Cote d’Ivoire, Cuba, Cyprus, Democratic Republic of Congo, Eritrea, Fiji, Republic of guinea, Haiti, Iran, Iraq, Krygyzstan, Lebanon, Liberia, Libya, North Korea, Somalia, Sri Lanka, Sudan, Syria, Venezuela, Vietnam and Zimbabwe.

### Principal Investigator Responsibilities

Every principal investigator should ask him/herself the following questions:

- Does the research involve any EAR categories?
- Does the research involve any item on the ITAR Munitions List?
- Does the research involve technology or devices designed for use in military, security and intelligence applications?
- Does the research involve anything else with a substantial or dual-use military application?
- Will you collaborate in any way with a foreign national as a research or commercial partner?
- Will you use a research assistant who is a foreign national?
- Will you send your research results to a foreign country or foreign citizens?
- Do you anticipate any foreign travel associated with the project?

If you answer affirmatively to any of these questions, then there is a possibility that export control does apply to your project. You must consult with the Sponsored Projects and Research Compliance Office to determine if export controls pertain to your project and if a license is required.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

Examples when export controls may apply to a PC employee

- A PC employee carries a laptop computer into one of the OFAC/embargoed countries.
- A PC employee carries a cellular phone that has a GPS system into a restricted country.
- A PC employee accepts an award from the U.S. government that has propriety restrictions on the release of data.
- A PC employee ships computers or encrypted software to a foreign country.
- A PC employee collaborates with a foreign national or releases information to a foreign national on a research project for the federal government.

Penalties for non-compliance

PIs are criminally liable for violating the ITAR/EAR/OFAC export controls or embargos.

### *ITAR Penalties*

- Criminal: up to \$1 million per violation and up to 10 years in prison
- Civil: seizure and forfeiture of articles, revocation of exporting privileges, fines of up to \$500,000 per violation.

### *EAR Penalties*

- Criminal: \$50K-\$1million or five times the value of export, whichever is greater, per violation, up to 10 years in prison.
- Civil: loss of export privileges, fines \$10K-\$120K per violation

### *OFAC Penalties*

- Criminal: Up to \$1 million and 10 years in jail
- Civil: \$12,000-\$55,000 per instance

Important Links for Further Information

ITAR

[https://www.pmdotc.state.gov/?id=ddtc\\_kb\\_article\\_page&sys\\_id=%2024d528fddbfc930044f9ff621f961987](https://www.pmdotc.state.gov/?id=ddtc_kb_article_page&sys_id=%2024d528fddbfc930044f9ff621f961987)

Commerce Control List (EAR)

<https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>

US Munitions List

[https://www.pmdotc.state.gov/regulations\\_laws/documents/official\\_itar/ITAR\\_Part\\_121.pdf](https://www.pmdotc.state.gov/regulations_laws/documents/official_itar/ITAR_Part_121.pdf)

# Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

## Intellectual Property

### Introduction/Purpose:

Providence College's faculty, staff, and students are regularly involved in scholarly activities which support and further the College's mission and strategic plan. Providence College believes it is important to share discoveries and inventions resulting from the core teaching, learning, research, and service missions of the College with the greater community to benefit society.

Intellectual property (IP) generally consists of patents, copyrights, trademarks and trade secrets. By establishing a policy on IP, Providence College seeks to support the activities of the faculty, staff, and students in identifying, protecting, and administering intellectual property matters and defining the rights and responsibilities of all involved.

The following are the objectives of the College's policy on intellectual property:

- To encourage the creation and sharing of knowledge, & to promote understanding of such knowledge.
- To clarify ownership rights and responsibilities of all parties involved in the creation of intellectual property; and,
- To outline a system to help authors and inventors and the College bring new knowledge to society.

### Application and Definitions:

#### A. Application

This policy applies to all persons employed by Providence College and any person using Providence College facilities under the supervision or sponsorship of College personnel (including students, visitors, volunteers, fellows, and scholars). This policy governs the development and ownership of intellectual property. The Providence College [Copyright Policy and Guidelines](#) outlines policy and guidelines for the appropriate use of content subject to copyright law.

#### B. Definitions

1. **Copyright** is secured automatically when the work is created, and a work is created when it is fixed in a copy or recording for the first time. Copyright is a type of intellectual property protection that protects the manner in which an idea is expressed.
2. **Creator** means faculty, staff, administrators, students, or groups thereof that use funds, facilities, or other resources of the College as the authors, inventors, or originators of intellectual property.
3. **Intellectual Property** is a new creation, such as patentable inventions, new processes, written compositions, computer software, new chemical compounds, music, other artistic creations, new forms of plants or animals, or any copyrightable subject matter. Intellectual Property is granted legal aspects of a property right, including patents, copyrights, and trademarks.

## Policies and Procedures for Sponsored Projects and Research Compliance at Providence College

4. **Invention** is any new or useful process or discovery, method, technique, machine, device, manufacture, software, or other improvement thereof. Inventions are novel, useful, and not usually obvious to individuals skilled in the field in which they are developed.
5. **Patent** is a legal instrument issued by the federal government, acting through the Patent Office that protects and preserves the intellectual property rights of the creator and the College, and facilitates the transfer of intellectual property for commercialization and public benefit.
6. **Trade Secret** is any valuable information that is not generally known and for which reasonable efforts to preserve confidentiality are necessary and legally mandated.

### Determination of Ownership:

#### A. *General Rule*

Subject to applicable law, any IP created or developed by members of the Providence College Community shall be owned by the creator(s) of such IP.

The following (B-F) are exceptions to the General Rule (A).

#### B. *Rights of ownership are determined by a contract or grant agreement.*

Ownership of the IP in works created through projects or programs funded by an external agency or sponsor, such as a grant or contract, will be determined by the terms of agreement with the external party. For example, legal requirements of government-sponsored projects (e.g. the Bayh-Dole Act) normally transfer IP rights to the institution. An agreement concerning ownership must be signed by the College, the external agency and the individuals involved in creating such works if ownership is not included in the terms or conditions of the grant or contract.

#### C. *Providence College owns IP when an identity interest exists.*

The College has an *identity interest* in works that are integral to, and reflect more directly on, the identity of the College than on the identity of the individual(s) who create the works. For example, the College has an *identity interest* in items disseminated beyond the College, such as various catalogues, institutional web pages, alumni magazines or College publications, admissions brochures, and fundraising materials. An *identity interest* also occurs when there is a prominent use of the College's name, or of any image, trademark or logo of the College. Simply identifying the author of a work as a Providence College faculty or staff member, in and of itself, would not be considered prominent use of the College's name.

#### D. *Providence College owns IP when it has a functional interest.*

The College has a functional interest in works that are used to enhance the effective functioning and coordination of ongoing operations of the College, or in which the College has a contractual or legal obligation. This may include College directed or commissioned works produced by an individual or group as a specific job requirement or work for hire. Examples include, but are not limited to: software

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developed by technical staff, internal handbooks and reports, administrative procedures and policies. Excluded from this category are materials created by faculty in connection with their teaching, research, or other scholarly activities that are not specifically commissioned by the College, even though teaching and engaging in scholarly activities are considered part of their job. Certain collaborative agreements also require the College to negotiate IP rights with other entities, creating a functional interest in the work.

- E. *Providence College owns IP if it is developed in connection with a specific, institutionally-defined and commissioned project.*
  
- F. *Providence College may share IP with the creator if there is exceptional use of College resources.*

An exceptional use of College resources for faculty or student work means that the College has provided funding, facilities, or staff support of a degree or nature not typically made available for faculty or student work. Ordinary use of desktop computers or the College library, routine support from College staff, or use of College office space does not constitute exceptional use. In addition, the College's provision of standard labs, funding for pre-tenure research leaves or sabbatical leaves, and funding from internal grant funds (such as Committee on Aid to Faculty Research (CAFR)) and start-up funds, are not considered to be exceptional use of College resources. In the event that a faculty member expects to be provided exceptional or atypical support from the College, a written agreement or formal determination should be reached before resources are provided. This agreement should specify the allocation of resources and the extent, if any, of College ownership that may result from the work.

### **Providence College Use and Access Consistent with the Purpose of the Work:**

- A. *Works Specifically Created for Teaching, Administration, or Other College Activities.*

It is understood that the College may use without charge any copyrighted work developed for the specific purpose of making it available for use by persons, other than the author, in teaching and to perform administrative duties or other College activities. The creators of reusable teaching and classroom materials for Providence College provide a license to the College, which will include broad non-exclusive world-wide, royalty-free, perpetual, and irrevocable rights to use, display, copy, distribute, modify and prepare derivative works of such materials for the ordinary course of its teaching, scholarship, service and administrative functions.

- B. *Use of College Facilities*

In general, College facilities are not to be used for personal gain or commercial advantage. If in the development of copyrightable materials that result in royalties or other payments, a faculty member makes significant use of College equipment, facilities, and supplies, wherein the College incurs real costs, the faculty member should reimburse the College for these costs; or, in the alternative, ownership of the resulting works should be assigned to the College. Similarly,



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significant use of College facilities may not be made by faculty members in connection with outside consulting, done on a fee-for-service basis. Otherwise, the College should be reimbursed for any significant real costs incurred.

### **Institutional Support for Commercialization of IP Owned by Providence College**

**A. Reporting:**

The creator(s) must file a report as soon as circumstances make it reasonably clear as to the production or planned production of any IP: 1) that would require extraordinary support or resources of the College; 2) for which the creator intends to seek a patent or other commercialization and the process of commercialization involves substantial cost and effort, and the creator wishes the College to consider providing some or all of that support; and/or, 3) that would be created under a government or private sponsor grant that specifies IP rights. Reports should be made to the Intellectual Property Committee using the IP Disclosure and Reporting Form.

**B. Determinations:**

If the creator seeks a patent on, or otherwise plans to commercialize IP the process of protection or commercialization may involve a substantial cost and effort, and the creator may wish the College to consider providing some or all of the support and share the net rewards, liabilities, or risks with the College. The Intellectual Property Committee will determine whether Providence College will provide assistance in the protection and commercialization of such IP. In good faith consultation with the creator, the Intellectual Property Committee will undertake a patentability review (with the assistance of patent counsel if necessary) where, in the discretion of the IP Committee, such a review is reasonable to procure based upon the potential value of the invention. Where, in the Committee's sole discretion, the filing of a patent application is deemed appropriate, it shall be the College's responsibility to undertake such a filing at its own expense and in its own name. The College may choose to waive rights of IP ownership and such waiver will be made in writing to the creator within 90 days of the IP disclosure.

**C. Net Revenue Distribution:**

Unless otherwise agreed, Net Revenue shall mean Gross Revenue, consisting of any cash or cash proceeds that the College receives in connection with an invention or copyrightable property (excepting payments to the College for research, or contributions to the College of equipment, which payments shall be the sole property of the College and shall not be considered Gross Revenue for purposes of this Policy), **minus** actual commercialization costs incurred by the College, including but not limited to costs for protection of IP, filing fees, legal fees, marketing, advertising, licensing costs, and other costs actually incurred by the College.

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With respect to IP owned by the College, Net Revenue shall be distributed (usually annually) as follows: 50% creator and 50% Providence College.

In the event of joint creators, the amount allocated to the creator under the above schedule shall be divided equally among the joint creators, except as may be otherwise agreed to by the joint creators and documented in a written agreement submitted to Intellectual Property Committee.

In the event the College receives equity in a business, stocks, or shares in connections with any intellectual property, such equity shall be considered Gross Revenue and shall be apportioned according to the above schedule upon liquidation of the equity interest by the College. Any equity received by the College may be held until the College decides to liquidate the equity.

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**V. INSTITUTIONAL COMPLIANCE POLICIES**

**Lobbying**

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 28 CFR Part 69, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 28 CFR Part 69, Providence College certifies that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or 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 making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement;
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or 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 this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;
- (c) Providence College shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all sub-recipients shall certify and disclose accordingly.

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### **Debarment and Suspension**

As required by Executive Order 12549, Debarment and Suspension, and implemented at 28 CFR Part 67, for prospective participants in primary covered transactions, as defined at 28 CFR Part 67, Section 67.510

Providence College certifies that it and its principals:

- a. Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency;
- b. Have not within a three-year period preceding an application of federal funds been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- c. Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local); and
- d. Have not within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default; and B.

Principal Investigators assure they are not debarred or suspended when s/he signs the Providence College Grants Routing Form.

Vendors/Consultants paid on Federal Funds assure through a statement on the invoice that the organization is not debarred or suspended.

For purchases or payments greater than \$5,000 of federal funds, Financial Services will check the Excluded Parties List System (EPLS) to ensure that the party receiving federal funds is not an excluded party.

## **Policies and Procedures for Sponsored Projects and Research Compliance at Providence College**

### **Drug-Free Workplace**

As required by the Drug-Free Workplace Act of 1988, Providence College certifies that it will continue to provide a drug-free workplace.

Providence College is committed to insuring that all employees attend work confident that they will not be endangered by the use or abuse of drugs. We need to work together to maintain a safe, healthful and efficient working environment free from the harmful effects of drug abuse. To comply with the federal Drug-Free Workplace Act of 1988, the College will enforce the following:

1. Any employee of Providence College, permanent or temporary, full-time or part-time, is prohibited from engaging in the unlawful manufacture, distribution, dispensing, possession or use of controlled substances on the College premises, in vehicles provided by Providence College, at any worksite or location at which College duties are being performed by Providence College staff members, or as part of any other Providence College activities. Any such activity constitutes grounds for immediate termination. Common examples of controlled substances, as defined by law, are cocaine, marijuana, methamphetamines, and heroin. Other drugs and substances that may be used and abused include, among others, alcohol, pain killers, sedatives, stimulants and tranquilizers. Any employee under the influence of drugs or alcohol that impairs judgment, performance or behaviors while on campus or on College business will be subject to discipline up to and including termination.
  
2. In order to provide pertinent, useful information and to emphasize Providence College's commitment to maintaining a drug-free campus, every employee will be provided periodically with written materials containing reminders about the dangers of drug abuse in the workplace. This material will describe the scope and availability of any drug counseling, rehabilitation, and employee assistance programs, and will restate the penalties that may be imposed for drug abuse violations in the workplace. At various times, the College will also schedule films and lectures pertaining to these topics.
  
3. Every employee is required to notify the Department of Human Resources of any criminal drug statute conviction for a violation occurring on the campus no later than five days after the conviction.

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**VI. SPONSORED RESEARCH ROLES AND RESPONSIBILITIES AT PC**

**PI:** Principal Investigator is the individual responsible for the programmatic and administrative aspects of a project or research.

**SPaRC:** Sponsored Projects and Research Compliance

**FS:** Financial Services

ROLES AND RESPONSIBILITIES	PI	SPaRC	FS
<b>Pre-Proposal Activities</b>			
Disseminate information about and promote funding opportunities from external funding sponsors		X	
Contact SPaRC regarding intent to apply for external funding	X		
Consult with prospective applicants about potential project ideas and funding sources		X	
Coordinate with Corporate/Foundation Relations and Constituent Engagement related to requests to private foundations and corporations		X	
Review sponsor program guidelines and solicitations (primary party responsible for this is the PI)	X	X	
Where multiple applicants seek funds from the same source, ensure on-campus review to prevent conflicts among competing proposals		X	
Maintain online sponsor agency user accounts for PC-affiliated individuals		X	
<b>Proposal Development Activities</b>			
Prepare the draft technical proposal, budget, and related materials	X		
When requested, review draft grant proposals and provide substantive editorial guidance		X	
Assist PI(s) where appropriate with organizing and/or convening meetings with relevant project partners on and off-campus		X	
Discuss any cost sharing/matching funds with Department Chair, School Dean, or other relevant party	X		
Discuss leave time and course release issues with Department Chair, School Dean	X		
Assist with external grant submission procedures		X	
Act as a resource for budget preparation (i.e., salary figures, fringe benefit rates, indirect cost rates, appropriate categorization of budget items, etc.)		X	X

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ROLES AND RESPONSIBILITIES	PI	SPaRC	FS
Provide institutional certification letters where specified by sponsor agency (for e.g., NSF RUI and MRI programs)		X	
When Providence College will be a subrecipient on a proposal, complete the requested subaward paperwork for the lead institution	X	X	
Complete and sign the college's Proposal Routing Form; obtain the signature of other Providence co-investigators (when applicable), Department chair, and Dean	X		
Review completed/signed Proposal Routing Form, draft proposal, and other applicable forms; obtain the two institutional administrative signatures		X	
Review and approve proposed budget		X	X
Submit proposal to sponsor/funding agency on behalf of Providence College.		X	
Identify and secure required regulatory approvals (i.e., use of human subjects, animals, biosafety, and radiation safety.) This is required prior to the commencement of your research.	X		
<b>Grant Management/Administration Activities</b>			
Negotiate award terms and conditions with Sponsor (PI focuses on scientific components of negotiation and SPaRC handles administrative)	X	X	
Inform Financial Services of Notice of Award and provide supporting documentation for award set-up		X	
Review terms and conditions of the award, including allowable expenses.	X	X	X
Establish and maintain externally sponsored grant funds in the financial accounting system (Banner)			X
Notify PI and appropriate parties of grant fund creation and any specific financial guidelines associated with the award			X
Conduct the research/program within the scope and objectives of the proposal	X		
Oversee grant budget management	X		
Initiate hiring/assignment of personnel working on the sponsored research/program	X		
Ensure allowability of expenses (primary party responsible is the PI)	X		X