



**Sponsored Programs
and
Research**

Policies and Procedures Manual

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The document that follows, *Manual for Sponsored Programs and Research: Policies and Procedures*, provides a construct for planning, implementing, and overseeing sponsored activities.

Preface

South College encourages faculty and staff to engage in scholarship, professional development and sponsored program activities in order to maintain vitality in their profession, to provide the best and most up-to-date instruction, to provide training activities, development programs, demonstration projects, and other programs and services to enhance the College and local community. The College promotes acquisition of external support for these endeavors, whether support is needed for research, public service, or instructional activities. The institution strives to be a service-orientated office prepared to assist faculty and staff in the steps necessary to secure and administer external funding.

The intent of this *Manual for Sponsored Programs and Research* is to provide a reference in areas of services and support offered and to present the policies and procedures that guide the College community. Sections provide overviews on informational services, multi-institutional coordination, proposal development and submission, post award negotiation and management, and regulatory and compliance issues. When the approval or guidance of other College offices is required, e.g., that of the Chief Financial Officer or the Human Resources Department, the *Manual for Sponsored Programs and Research* identifies the issues and directs you to the appropriate office.

I. Overview of Sponsored Programs and Research

South College seeks to provide a learning environment that promotes the personal, intellectual, and professional development of all members of the College community. To this end, the institution encourages, assists, and supports faculty and staff who are seeking sponsorship for, or are engaged in, a broad range of externally funded projects.

A. Definitions

Sponsored Programs

Sponsored Programs are projects supported by non-College (external) funds that are awarded as a result of an application submitted to a potential sponsor by the College on behalf of a faculty or staff member. Sponsored Programs usually involve research, training, or service activities and typically include one or more of the following:

- *Formal sponsor application guidelines*
- *Restrictions on the use of funds*
- *A specific program period*
- *Specified performance or outcomes*
- *Specified use of program outcomes or data*
- *Required fiscal and/or programmatic reports*

Excluded from this definition are:

- *Direct payments to individuals, such as faculty fellowships not administered by the College*
- *Student financial aid*
- *Gifts and bequests to the College*
- *Donations of equipment or property*

The official applicant for all sponsored programs is the College, with the Vice Chancellor of Institutional Advancement and Effectiveness and the Chancellor designated as the official signatory.

If an individual or organization (donor) designates funding as a gift and the donor requires no financial or programmatic reports, the Executive Office of the Chancellor is responsible for the activity. Any request for donations or gifts from an outside donor should be coordinated through the Executive Office of the Chancellor.

Proposal

In simplest terms, a proposal is a request for funding of a particular sponsored project. In general, it consists of several parts: a technical or narrative section, a budget, and various assurances and forms. Appendices and attachments may or may not be required. A good technical proposal is a concise and coherent explanation of a project plan that has specific and reasonable goals. It should clearly state both the goals of the project and the methods to be used in reaching those goals. Finally, it should comply with sponsor limitations on length and should include only those supporting materials that are relevant. The budget is the Principal Investigator's/Project Director's (PI/PD) best estimate of the funds needed to carry out the project. It should be as detailed as is reasonably possible; the PI should be able to justify each budget item in writing.

When a sponsor has its own application form or instruction for submission, it is important that the PI use these forms and format, and follows the guidelines. PI's should remember that the lead-time for review of proposals is six to nine months.

A proposal can describe a new, renewal, supplemental, or continuing project for which funds are sought from a potential sponsor in the form of a grant, contract, cooperative agreement, or other instrument. Proposals may be in response to a solicitation (often an RFP, RFA or program announcement) from a sponsor or may be unsolicited. Following is a definition of types of proposal:

- **New Proposal:** A new proposal is one which is submitted for funding of a new project that has not previously been funded. In almost every instance, new proposals are subject to competitive review. Proposals will be evaluated and ranked according to criteria established by the funding agency.

- **Continuation Proposal:** Most agencies award grants for a specified project period (usually one, three, or five years). Regardless of project length, the grantor generally makes funds available for only one year at a time. In order to obtain funds for additional periods of time within the grant period, a “continuation application” must be submitted. Continuation applications usually are not subject to competitive review.
- **Renewal Proposal:** In a renewal proposal, the PI requests support beyond the initially approved project period. The type of sponsored program award—grant, contract, or cooperative agreement—is an indication of general program requirements regarding the sponsor’s role in the program, the Principal Investigator’s responsibilities, the nature of expected outcomes, the payment method and schedule, and the use of program results or data. The particular program requirements for each sponsored program are specified in the award document.
- **Supplemental Proposal:** A supplemental proposal can be one of three things: it can add to an existing proposal to compensate for a deficiency, give further information, or change the direction of a proposal, and it can be a special subject added to enhance an existing proposal. With Supplemental proposals, PI/PD’s usually ask for additional funding or an extension on existing funding. Supplemental proposals are subject to competitive review.

B. Types of Sponsored Funding Sources

Familiarity with the types of funding sources can help faculty and staff identify potential sponsors (as opposed to donors) whose interest and level of support are appropriate to the project planned. Common categories of funding sources include federal, state, and local governments, foundations, and business/industry.

Government

Federal, state, and local governments provide support for various sponsored programs. Examples of federal funding sources include the Environmental Protection Agency (EPA), National Endowment for the Humanities (NEH), Health and Human Services (HHS), National Institutes of Health (NIH), and the National Science Foundation (NSF).

Examples of local government sources include County government, city government and various councils.

Foundations

Private and community foundations are another source of funding support. Many foundations have very small staffs, so communication can be quite limited. However, foundations can be excellent sources of funding if applicants have innovative ideas and target foundations that are most likely to have an interest in the project topic. Most foundations restrict their support to very specific areas of interest, so obtaining a foundation’s published annual report or funding, when available, can help researchers determine particular funding opportunities. Providing a

foundation with a brief (e.g., three-page) concept paper of proposed research is often an important first step in seeking foundation sponsorship.

Business and Industry

Although often overlooked by academic researchers, business and industry can be important funding sources. Business/Industry support may include cash funding and/or in-kind contributions of expertise, services, equipment, or materials. Not only can business/industry provide support or partial support for a new project, but academic business/industry partnerships can also establish a basis for seeking additional funding from federal agencies or other sources, especially those requiring or rewarding such partnerships.

Proposals to business/industry generally originate with the creator of the project, not with an announced program. Therefore, extensive communication with the business/industry representative is crucial in determining project goals and expectations. Proposals are often much shorter and simpler than those submitted to federal agencies, although the resulting legal agreement can be quite complex. Business/Industry agreements often contain special clauses covering such things as publication rights, patents, nondisclosure of proprietary information, and indemnification.

Note: The Principal Investigator shall consult the supervisor, the Vice Chancellor, and the CFO to any agreement with business and industries to ensure that any proposed provisions are in compliance with College and State policies and to involve them in the negotiations process.

C. Types of Sponsored Programs

Sponsored programs fall into several general categories, which could serve as guides for the particular design of proposed projects. Specific guidelines from the sponsor will provide details for particular programs, but the determination of the “type” of sponsored program is an important early step in designing appropriate and competitive program goals, methods, and structure. The types of sponsored programs include:

- Research, involving any activity specifically organized to produce research outcomes
- Education and Training, involving any activity that is part of an institution’s formally organized instruction program
- Public Service, involving any activity that provides non-instructional services beneficial to individuals and groups external to the institution
- Scholarships and Fellowships, involving any scholarship or fellowship in the form of grants, trainee stipends, prizes, and awards
- Other, involving any activity that does not fall into the above categories

D. Types of Sponsored Program Awards

Grants

A grant is “an award of financial assistance to an eligible recipient in support of a proposed program.” The term “grant” is used to describe awards of extramural support for projects submitted by faculty or staff. Grants for student financial aid are managed by South College Office of Financial Aid and are **not included** in this definition. Generally, the grant mechanism is used when the sponsor is not seeking immediate benefit for itself but is simply providing support for work initiated by the Principal Investigator/Project Director (PI/PD). Grant recipients make no guarantees other than work will be done as described in the proposal and that good program management practices will be followed. If an agency wishes to award grants for research, training, or public service in a particular area, it will announce the availability of funds and invite interested parties to submit proposals.

The grantor offers a grant award via a Notice of Grant Award or letter indicating the amount to be awarded as well as the conditions that might be met. The requirements associated with a grant award vary widely from sponsor to sponsor. Generally, grant awards are made for a particular period of time, with definite start and end dates; grant awards usually include restrictions on the use of funds and on the reallocation of funds from one budget category to another. Most sponsors require periodic progress reports and annual technical and financial reports as well as final technical and financial reports at the end of a project. The sponsor expects to receive reports but not to supervise the program.

Contracts

A contract is “an exchange of promises that gives rise to legally enforceable rights and duties.” Contracts are agreements signed by each party which stipulate that the sponsor will provide funding to a recipient in support of a specific set of activities in return for which the recipient will furnish a particular product, service(s), analysis, report(s) or other materials. Contract negotiations are more likely than grant negotiations to involve discussion of proposed provisions restricting the publication or other use of data, or clauses affecting potential patent rights and licensing agreements. Contracts also generally require frequent, detailed reporting. In a contract arrangement, the sponsor is actively involved in overseeing the progress and direction of the project. A number of federal agencies use contracts to fund research, development, training, and public service programs. Most state awards are made in the form of contracts.

There are many different types of contracts. In sponsored projects, however, contracts are usually of two types, either fixed-price or cost-reimbursement. Under a fixed-price contract, the parties agree in advance on the price for a particular product or service. Once the agreement has been executed, the recipient is obligated to perform the work set forth in the contract and to deliver any and all products or “deliverables” specified in the contract. This requirement must be fulfilled, regardless of the cost to the recipient. If the cost of performing the contract is less than the amount set forth in the contract, the recipient (College) may retain the excess funds.

Under a cost-reimbursement contract, the sponsoring agency and the recipient agree on the work to be performed and on an estimate of the total cost for performing the work. The sponsoring agency is obliged to reimburse the recipient for actual costs (up to the contract total) incurred in the performance of the work specified in the contract.

Cooperative Agreements

Cooperative Agreements involve the active participation and collaboration of the sponsor in all aspects of the project. In these types of agreements, the sponsor participates (to some extent) in all decisions about what work is to be done, when it is to be done and who is to do it. Thus, the sponsor becomes a true and genuine partner in the project. Because the degree of sponsor involvement and the segregation of responsibility require specification, the cooperative agreement usually involves more detail than a grant, though perhaps less than a contract.

E. Responsibilities

Each proposal for external funding has the potential to become a legal document binding the College to fulfill the conditions specified in the proposal. When a proposal is submitted to a sponsor, it is submitted by the College, not the author of the proposal. When an award is received, the College on behalf of the Principal Investigator/Project Director receives it. Thus, the author of a proposal must seek, secure, and substantiate the College's commitment to issues of compliance, support, and concurrence with fiscal and programmatic statements. To do so, the author must ensure that the proposal conforms to the College's policies, mission, and obligations; must inform relevant administrators of potential commitments of time and resources and obtain their written consent to these commitments; and must document the College's compliance with applicable regulations.

It is the responsibility of the Vice Chancellor to review the accuracy and completeness of the College's support of the proposed project and the College's suitability as a recipient of the targeted award. College procedures for proposal development and submission are detailed in *Section III*.

Responsibilities associated with proposal development and submission and the conduct of resulting sponsored programs are outlined on the following pages.

PRINCIPAL INVESTIGATOR (PI)/PROJECT DIRECTOR (PD)

College policy generally requires that the Principal Investigator/Project Director of external grants and contracts must be a permanent employee (faculty member or staff member) of the College at the time of proposal submission.

RESPONSIBILITIES

- Develops program plans consistent with the mission of the submitting department/unit and school
- Writes and prepares proposal narrative and budget
- Transmits the proposal and one copy, with a completed and signed Transmittal Sheet for Sponsored Programs, to the Department Chair or Unit Head, the Dean and the

Vice Chancellor for further processing and signature, final signatures by Chancellor (allow 2 weeks minimum)

- Sends copy proposal as submitted to the sponsor to the Vice Chancellor and Controller for the Official College files
- Assumes responsibility upon award notice
- Implements and manages of the program consistent with College and sponsor policies
- Maintains technical, programmatic, and fiscal management and maintenance of related records
- Oversees quality program performance
- Prepares of all technical or programmatic reports
- Reporting of all inventions that may result
- Reporting of equipment purchased, as appropriate

DEPARTMENT CHAIR

If an academic department(s) is involved, the Chair(s) is the designated responsible person(s) at the department level. If a non-academic unit is involved, the Unit Head is the responsible party at this level.

- Reviews proposal for consistency with department/unit or college/school mission and availability and commitment of human and support resources, including time, space, and finances
- Assures that all faculty/staff and department/unit proposal obligations will be met
- Indicates concurrence with the proposal by signing the Transmittal Sheet (including signing any cost sharing agreements)

COLLEGE/SCHOOL DEAN

The Dean of the Principal Investigator's college/school is the responsible party at the college/school level, or, if Co-Principal Investigators are involved from different schools, the respective Deans are the responsible parties at the college/school level.

- Reviews proposal for consistency with college/school and College missions and availability and commitment of college /school support services, including time, space, and finances
- Assures that all department/unit and college/school obligations, as delineated in the proposal, will be met
- Indicates concurrence with the proposal and budget (including cost sharing, if any) by signing the *South College Routing and Approval Form for transmittal of proposals*

II. Proposal Development and Submission

The South College Proposal Routing and Approval Form is the official College form for the documentation for concurrence of College officials with plans and commitments contained in proposals for externally funded projects. (See *Appendix A*)

A **proposal** is a request for funding of a sponsored project. In general, it consists of several parts: a technical or narrative section, a budget, and various assurances and forms.

A **solicited proposal** is one that is submitted in response to a specific work statement from the sponsor. Sponsors to solicit proposals for specific research, development, or training projects or to provide specific services or goods sometimes use a **Request for Proposal (RFP)** or **Request for Application (RFA)**.

The RFP or RFA includes standard terms, conditions, and assurances the institution is asked to accept. A limited number of packages are usually printed for any solicitation.

An **unsolicited proposal** is initiated by the investigator and submitted according to the sponsor's guidelines. The funding arrangement for unsolicited proposals is usually a grant. The source of an unsolicited proposal is the initiative and imagination of the PI. The Principal Investigator may locate potential sponsors and ascertain, primarily through telephone or personal contact with sponsor program officers, the degree of interest these sponsors have in supporting the proposed work and the extent of available funding.

Faculty members are encouraged to contact consult their supervisor in the early stages of proposal development. In addition, the following materials relevant to the proposal development and submission process are among those available in the Sponsored Programs and Research (<http://www.south.edu>)

- *Proposal Development and Submission Guide*
- *South College Proposal Title Sheet (also located in Appendix A)*
- *South College Proposal Transmittal Sheet (also located in Appendix A)*
- *Informational aids for proposal and budget development*

Initiation of Collaborative Projects

The College encourages faculty to participate in collaborative projects initiated by faculty at other institutions. For assistance with project coordination or review of the College/sponsor requirements for these proposal submissions and sponsored program activities, the faculty member should contact his/her supervisor and the Vice Chancellor.

The process for internal review of proposals involving College participation in such collaborative projects is the same as that for proposals submitted by the College. The proposed project activities, a budget reflecting the portion of work to be performed at the College, and documentation of the College's obligation to the project must be reviewed and approved through the internal review process before the proposal as a whole is submitted to a sponsor by the collaborating entity. The Vice Chancellor must receive a copy of the full proposal within ten working days before the submission deadline. This copy will be reviewed for conformance to the portion previously approved. The College reserves the right to withdraw from any collaboration if the activities, budget, or other arrangements involving the College are altered without South College's Authorizing Official's approval.

Cost Sharing Procedures

Cost sharing should be included in the budget accompanying the proposal submission only if such arrangements are required by the sponsor's program guidelines. During the early stages of proposal development, prospective Principal Investigators anticipating a need for cost sharing should work closely with the Controller to identify sources for cost sharing and should begin the process of securing agreements to cost share and arrangements for documentation. Principal investigators must include, along with the proposal, written documentation by separate letter describing the source and amount of cash cost sharing. In-kind cost sharing contributions may be documented by signature only. If the project is funded, the cost sharing included in the proposed budget must be carefully documented throughout the program period (*see Section V, J on cost sharing documentation*).

College cost sharing

Potential sponsors may require that the College share the expenses of a sponsored program. The prospective Principal Investigator during the proposal development process must secure the College's agreement to any such costs sharing. Completion of the Transmittal Sheet requires signatures confirming any cost sharing agreements (*see Section III, E Transmittal Process*). Common items for College cost sharing include salaries, fringe benefits, and indirect costs related to South College direct costs.

Third Party cost sharing

Occasionally, guidelines for sponsored programs suggest or mandate the inclusion of a third party (an entity in addition to the College and the sponsor) to share in the cost of the project. At the time of the proposal submission, the prospective Principal Investigator must have written confirmation from the third party on the amount and nature of cost sharing to be provided and also a commitment to provide appropriate documentation to demonstrate the agreed upon amount of cost sharing to the satisfaction of the funding agency and the Business Office.

Transmittal Process

The Vice Chancellor and CFO/Controller are responsible for reviewing and processing proposals and budgets submitted to external sources **before** they are sent off campus. The Office of the Chancellor is South College's authorized official for grants and sponsored programs.

To begin the transmittal process, the faculty/staff member (Principal Investigator/Director) should first complete the form and obtain the signatures of the department chair, dean, and ancillary signatures as required. Allow a minimum of two weeks for the signature process.

The Transmittal Sheet, the Official College form for the documentation of concurrence of College officials with plans and commitments contained in proposals for externally funded programs, is the internal mechanism to:

- Inform all affected parties of the proposal
- Document their knowledge of and support for the proposal
- Document any needed and committed cost sharing for the program

- Document that the PI or any member of the proposed research team does not have a significant financial interest in the proposed project
- The Transmittal Sheet is to be completed for **all projects** for which external funds are sought or received by the College, **excluding gifts** to the College (*see Section I, A for a discussion of gifts vs. grants*). A copy of the Transmittal Sheet and instructions for its completion are located in Appendix A.
- Copies of grants/proposals are provided to:
 - Office of the Chancellor
 - Vice Chancellor
 - Business Office
 - Project Administrator/Project Director/Principal Investigator
 - Varying number of copies required by funding entity

The Principal Investigator should then forward the complete proposal, along with the Transmittal Sheet, necessary certifications, and any Significant Financial Interest Disclosure forms, if appropriate, to the Vice Chancellor and CFO **for internal review and approval**. The PI should allow at least **two weeks** for this internal review.

The Vice Chancellor and CFO reviews proposals for completeness of the Transmittal Sheet and compliance with agency regulations and coordinates budget review and approval with the Business Office (*see Section III, F for a description of the budget review process*). Upon approval of the proposal, officials of the Business Office affix the appropriate documents as required by the College and by the potential sponsor.

When the sponsor notifies the institution that the proposal will (or will not) be funded, the Office will inform all Transmittal Sheet signatories of the final action taken by the sponsor.

Note: To expedite the review process, PI's may circulate a draft proposal with the Transmittal Sheet and budget; however, one copy of the final proposal (as sent to the sponsor) must be sent to the Vice Chancellor before or at the time of submission to the sponsor. In addition, the Business Office highly recommends that Principal Investigators submit draft budgets to the Office for review of completeness and correctness to alleviate last-minute revisions.

Budget Review

The Business Office review proposal and contract budgets. If the Business Office detects a problem with the budget, the PI is contacted and the CFO/Controller works with him/her to resolve the problem. The corrected budget is then returned to the Business Office for approval of the budget and signing of the Transmittal Sheet. The final budget is included with the proposal for review by the Chancellor.

Restrictions on Multiple Submissions to Sponsors

Some funding sources formally prohibit or informally discourage the submission of multiple applications from a single institution. In such instances, when South College faculty and staff prepare competing grant applications, the College will approve the submission of only the number of applications specified by the sponsor. Faculty and staff are, therefore, encouraged

to notify the institution of their intent to submit a grant application in those instances in which the College is limited in the number of applications permitted.

The institution will work with the appropriate officials (e.g., department chairs, deans, and directors) to determine a procedure for selecting the proposals to go forth from the institution. For some programs that have yearly deadlines, a formalized procedure may have been established.

Note: Principal Investigators should contact the Vice Chancellor as soon as possible when considering submission under these circumstances.

IV. Post-Submission Activities

As with the transmittal process, the procedures for award review/acceptance and budget negotiation and/or proposal modification are established by College policy. Should the proposal be denied funding, the PI notifies signatories of the Transmittal Sheet.

A. Award Review and Acceptance: Sequence and Responsibilities

When the institution receives notification that an award has been made, the Principal Investigator is then asked to review the award document. The Principal Investigator must be aware of all terms and conditions of the award document.

While the Principal Investigator is reviewing the award document, the Vice Chancellor and CFO conducts its own review of cited terms and conditions, including relevant regulations (e.g., Code of Federal Regulations {CFR}, Federal Acquisition Regulations {FAR}, Office of Management and Budget {OMB}, Circulars, and other references). The review determines if the award document complies with College policies and procedures and is acceptable to South College. If there are any questions of compliance with South College policies and procedures, the appropriate College department (e.g., Human Resources, Business Office, Office of the Chancellor, etc.) will be consulted.

If both the Principal Investigator and the institution find the award document acceptable, the signature of the Chancellor is secured, the only person authorized to accept such awards/contracts for South College. If/when the award document has also been signed by the sponsor; the document is considered to be fully executed and is forwarded to the Business Office.

B. Budget Negotiations and Proposal Modification

Occasionally a sponsor will express interest in supporting a proposed project provided that certain changes are made. These may include:

- *Changes in the budget (usually a reduction)*
- *Addition, modification, or deletion of objectives*
- *Change in performance period*
- *Change in Principal Investigator*

The Principal Investigator should review the proposed revisions and determine whether the revised project would be in the best interest of the College. For instance, if a sponsor wishes to reduce the amount of a budget without a comparable reduction of objectives, the project will probably not be in the best interest of the College and the Principal Investigator.

If the sponsor-suggested changes can be made and the Principal Investigator revises the overall proposal or budget, the revised proposal should be transmitted through the usual transmittal process (*see Section III, E*), with “**revised**” indicated on the Transmittal Sheet. The Chancellor must signify approval.

Note: Negotiations regarding the technical content of the proposal are the responsibility of the Principal Investigator. However, all questions relating to fiscal and administrative aspects of the proposal should be referred to the Business Office and the Principal Investigator. Principal Investigators/Project Directors are reminded that they do not have the authority to commit the College contractually.

C. Withdrawal of Proposal

If for some reason it becomes necessary to withdraw a proposal before it has been acted upon by the sponsor, the Principal Investigator should notify the supervisor. The supervisor will take appropriate action for the withdrawal of the proposal and will notify the Chancellor.

D. Denial of Funding

When the institution receives notice that a proposal has not been selected for funding, a copy of the Transmittal Sheet for Sponsored Programs is sent to each signatory of the Transmittal Sheet, indicating that the project was not funded. If the Principal Investigator receives a rejection notice, a copy should be forwarded to the Business Office.

In the case of denied funding, the Principal Investigator is encouraged to request from the sponsor an evaluation summary of the review. This evaluation may point out omissions and weaknesses in the proposal which, if addressed, could result in a much stronger subsequent proposal. First time applications, on the average, are less successful than subsequent applications. The Principal Investigator is encouraged to share reviewers’ comments with the supervisor and discuss resubmitting the application to the same sponsor or seeking other possible funding sources.

V. Sponsored Program Post-Award Management

The Principal Investigator/Project Director (PI/PD) is responsible for conducting the sponsored program in accordance with College and sponsor regulations. This responsibility requires expert knowledge of the issues related to sponsor program management.

A number of College offices share in the responsibility and provide detailed manuals, as well as individual staff assistance, to assist the PI/PD in gaining the knowledge and skills needed for successful, accountable program management. The PI/PD should become thoroughly knowledgeable of the policies and procedures covered in the manuals provided by the following offices and contact their staff as needed:

- Manual for Sponsored Programs and Research: Policies and Procedures;
- Business Office -Travel Regulations;
- Department of Human Resources-South College Employee Handbook and Faculty Handbook, Personnel/Affirmative Action

A. Establishment of Sponsored Program Account

The Award Notice document provided by the sponsor is used to establish a separate College account for the intended purpose of the award.

The Business Office notifies the Principal Investigator of the assigned number and provides information regarding expending the award.

B. Grant/Contract Post-Award Administration: Responsibilities

Principal Investigator Post-Award Responsibilities

The Principal Investigator is responsible for the day-to-day management of the program in accordance with College/sponsor policies and guidelines. Responsibilities include:

- Assembling and providing guidance to program personnel
- Expending funds in accordance with College/sponsor regulations; providing the Business Office with activity reports documenting the personnel time devoted to the program
- Working with the Business Office to document cost sharing committed in the grant, as appropriate
- Conducting the program as described in the proposal and award notification
- Providing technical liaison with the sponsor
- Preparing and submitting technical reports and invention reports and cooperating in the completion of other reports, as required and
- Maintaining records in accordance with College and sponsor regulations

Sponsored Programs Post-Award Responsibilities

The supervisor and Vice Chancellor are responsible for the non-financial administration of sponsored programs which includes:

- Negotiating and accepting award terms and conditions
- Coordinating with the Business Office the preparation of subcontracts related to sponsored programs
- Ensuring that the PI has obtained all required certifications and assurances (regarding, for example, the use of animals or human subjects in research, biohazards, etc.)
- Serving as a liaison between the College community and the external sponsor regarding non-fiscal grants-management issues and no-cost extensions
- Processing actions that require prior sponsor approval or those allowed by the expanded authorities (*see Section V,K*)
- Monitoring report submission
- Coordinating overall non-fiscal grants management and
- Ensuring College concurrence with federal regulations regarding non-fiscal compliance issues

The Business Office Post-Award Responsibilities

The Business Office is responsible for financial administration of all external grants and contracts. Specific responsibilities include:

- Serving as contact point with agencies for fiscal matters;
- Assisting PI's in fiscal post-award administration;
- Ensuring consistent application of federal policies related to fiscal matters;
- Establishing accounts for programs after the fiscal review of award documentation;
- Informing PI's of program expenditures and encumbrances;
- Processing expenditures and submitting fiscal reports;
- Ensuring that all documented cost sharing is reported to the sponsor;
- Calculating and recovering all legitimate indirect costs; and
- Closing out accounts

C. Subcontracting Procedures

Implementation of some sponsored programs may require that a significant portion of the work be conducted by a person or persons not affiliated with South College. In such cases, South College, when designated the official or "prime" recipient and fiscal agent of the award/contract, issues a subcontract for the portion of work to be performed by the non-affiliated party. Usually the PI must indicate in the proposal any intent to subcontract a portion of the project. The Chancellor is informed of subcontract involvement before approval. Sponsor regulations that apply to the prime recipient of an award may also apply to any subcontractors and must be referenced in the subcontracts accordingly.

Federal regulations, including OMB Circular A-110, stipulate clauses that must be passed down to subcontractors. The prime recipient is responsible for ensuring that the subcontractors are informed of and comply with these regulations. Standard clauses in federal subcontracts include, but are not limited to, the following:

- Audit;
- Records and retention; and

- Certification of assurances

The Principal Investigators/Project Directors in the development of subcontracts for sponsored programs and ensures that subcontractors have supplied appropriate financial information. The Business Office staff will work with the Principal Investigator and the proposed subcontractors to design and negotiate acceptable subcontracts wording in keeping with sponsor guidelines and regulations and College policies and procedures.

After subcontracts have been signed by the subcontractor and South College has received required documentation (audit reports and documentation of indirect cost and fringe benefit rates), the Controller processes subcontracts and secures the signature of the Chancellor.

The PI is responsible for monitoring subcontracts, including reviewing all invoices from subcontractors and attesting that subcontractors' performance is satisfactory and on schedule prior to payment of the invoice.

Subcontractors are also involved in the closeout process of grants and contracts. The PI is responsible for receiving final invoices in a timely manner so that South College final financial, programmatic, and other reports can be filed as required by the sponsor (see *Section V, I Reports* and *Section V, N Program Termination and Program close-out*).

D. Sponsor Regulations and Policies

The PI has the responsibility to administer the grant in accordance with both the sponsor and College regulations.

E. Financial Management

The Business Office has responsibility for fiscal matters regarding grant and contract awards. After the award is reviewed, the Business Office establishes the sponsored program account (see *Section V, A*) and forwards information pertinent to the fiscal management of the sponsored program to the Principal Investigator. Principal Investigators are provided with monthly expenditure sheets reflecting monthly and cumulative expenditures and encumbrances on a College fiscal year basis (October 1 – September 30).

The PI is responsible for managing the budget and expending it in accordance with sponsor and College regulations on allowable, allocable, and attributable expenses related to the project, as indicated in the approved budget. Some sponsors require approval of any divergence from budget categories or items. **Section V, K** provides information regarding procedures for seeking prior approval for deviations from conditions imposed in an award document. The PI must be familiar with and comply with both the sponsor's guidelines and the College guidelines for fiscal management of sponsored programs.

General guidelines for expending sponsored program funds are as follows:

- Costs must be allocable, bearing a direct relationship to the activities of the program, not the general needs of the department or College

- Costs must be reasonable, reflecting conscientious and prudent financial decision-making.
- Costs must be consistently treated with the normal costs standards of the College and not exceeding normal limits of similar charges that are not grant supported.
- Costs must adhere to sponsor-stated restrictions, recognizing and respecting any restrictions on use of funds stipulated by the sponsor.

The College is subject to an annual audit in accordance with *OMB Circular A-133*. This audit conforms to specified federal guidelines and serves to certify the effectiveness of the financial management systems and internal procedures. Fiscal integrity of financial transactions is tested, as well as compliance with terms and conditions of federally sponsored activities. The annual audit involves a review of both institutional systems and selected individual programs accounts. Financial records and internal oversight are also subject to review by internal audit.

The Business Office personnel are available to Investigators to assist and advise Principal Investigators of fiscal issues related to sponsored programs management.

F. Personnel Issues and Procedures

College policies and procedures, as well as any sponsor regulations, strictly guide the hiring of personnel to be associated with a sponsored program. The PI will be required to address issues such as the following:

- Determination of status, e.g., consultant/independent contractor, or employee
- Determination of position classification, which establishes salary range
- Compensation guidelines
- Personnel policies; for information on personnel issues, consult the South College Employment Handbook, and/or contact the Human Resources Department; and
- Affirmative Action policies and procedures

G. Purchasing and Property Control

General Purchasing Procedures

Federally funded projects are required by law to comply with certain purchasing standards. These may include documentation of bid, utilization of women/minority owned businesses, compliance with Labor Standards, and other issues.

The PI should work with the Business Office to ensure compliance with sponsor purchasing requirements.

All funding through federal grants and contracts will be processed through the College's accounting system. Therefore, purchases are subject to Public Purchasing Laws.

Property Control

The Business Office manages property reports requirements. Inventory Control numbers will be assigned by the Department of Informational Technology and the Business Office and affixed to each piece of equipment in a readily accessible place.

The purchasing of sponsored equipment requires the initial determination concerning whether the item is a purchase that must be inventoried (Capital Purchase) or one that is expendable in nature (Non-Inventory-Miscellaneous Minor Equipment Purchase). The following information is provided in identifying and classifying equipment purchases for sponsored projects:

Capital Equipment - Inventory

Capital equipment is defined as any item of non-expendable nature, such as a movable unit of furniture or furnishings, an instrument, or apparatus, a machine (including attachments), an instructional skill training device, or a set of small articles whose parts are replaceable or repairable; the whole retaining its identity and utility over a period of time which is characteristic of and definable for items of its class. Items in this group, generally, should have a useful life expectancy of three years or more and an acquisition cost of \$500 or more per unit.

Miscellaneous Minor Equipment - Non-Inventory

Miscellaneous equipment is defined as any item of an expendable nature, regardless of service life, and having an acquisition cost of \$499.00 or less.

Note: Sponsor definitions of equipment may vary from College definitions. The Business Office can assist in determining whether an item should be purchased with equipment funds.

H. Travel Policies

Travel activities must be in compliance with the sponsor's travel policies and College Travel Policy. For example, travel outside the continental United States generally requires prior approval by the sponsoring agency grants officer, as well as by the College. When South College and the sponsoring agency travel rates differ, the more restrictive rate applies. The South College Travel Policy is available from the Business Office.

I. Reports

For all sponsored programs, Principal Investigators must notify the supervisor and Controller when a technical/programmatic report is sent to the sponsor. This may be accomplished by sending a copy of the report sent to the sponsor and/or a copy of the cover letter addressed to the sponsor representative. In addition, for all other reports required by the sponsor (except for fiscal/financial reports), Principal Investigators should send the Controller a copy of the report for the Official College files to document report submission.

Time and Effort Reports

Purpose of Report

The Time and Effort Certification Form represents an after-the-fact certification of an individual's actual effort. The Time and Effort Certification is designed to gather effort-related data as required by Office of Management and Budget Circular A-21. Employees who are paid (totally or partially) from federally funded sponsored agreement—or employees who are used in mandatory or voluntary cost sharing for those awards—are subject to A-21 reporting requirements.

Frequency of Reports

The Time and Effort Report is generated at the end of each quarter for employees having yearly appointments. The Effort Certification Report must be certified by the employee and a responsible College official (usually the Principal Investigator and the immediate supervisor). The persons certifying the report must have firsthand knowledge or suitable means of verifying all the effort shown on the report. Suitable means of verification include effort that is inferred from time sheets, work product, work contributed, etc. The signed Effort Report must be submitted to the supervisor and Controller within thirty days after the end of the quarter.

Reports to the Sponsor

Sponsors frequently require the following types of reports:

Technical/Programmatic Reports: The PI is responsible for meeting the sponsor's schedule for technical or programmatic reports in a timely fashion. The frequency and type of reports vary by sponsor and program. Some programs require only a final program report. The reporting requirements are stated or referenced in the grant/contract award document.

Fiscal/Financial Reports: Fiscal/Financial reports are completed by the Business Office on the schedule and in the format requested by the sponsor. For further details regarding these reports, contact the Business Office.

Equipment Purchase Reports: Occasionally, sponsors will require reports (usually on an annual basis and along with the final report) on the equipment purchased with sponsor funds.

Note: Sponsors may withhold payments to the College because of late or delinquent reports

J. Cost Sharing Documentation

It is the Principal Investigator's responsibility to work with the Business Office for the mandatory documentation of cost sharing committed in the approved budget (see *Section III, D for cost sharing procedures*).

Systems for capturing documentation already exist for common forms of College cash and in-kind cost sharing, such as indirect costs related to South College direct costs, salaries, and fringe benefits. Salaries and effort must be reported to the Business Office quarterly. In determining the level of effort for a sponsored project, teaching load and other assigned duties

of individuals, in addition to other cost sharing commitments, must be considered. Time must be available for the individuals to perform on the project both for pay and for contributed effort.

For any third-party cost sharing, the PI should work with the sponsor and the Business Office, to ascertain what constitutes appropriate documentation for cost sharing. The PI should then inform the third-party cost sharer of the schedule and nature of the required documentation.

K. Systems for Sponsor Required Prior Approval

During the course of a program, a Principal Investigator may find it necessary to deviate from certain conditions imposed in an award, such as performance period, budget, etc. Some deviations from award conditions can be approved by South College as a result of expanded authorities provided in OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, for federally funded programs. The PI is responsible for initiating the request and justifying the requested changes. The written request must be signed by the PI and forwarded to the Controller for review and approval by the Chancellor. **Changes will not be made until written approval is received from the sponsoring agency.**

Note: The Business Office processes all requests that are allowed by expanded authorities granted to the College or that require prior approval by the sponsor.

L. No-Cost Extension

Although sponsors expect the sponsored program to be completed by the originally specified deadline, some sponsors allow “no-cost extensions” of the program period. That is, the sponsor may agree to an extended performance period but commits no additional funding to the program. Among sponsors allowing no-cost extensions, the procedure for obtaining a no-cost extension and the amount of time allowed for an extension vary. Some federal agencies authorize the College to grant these extensions internally, within agency guidelines. The PI should provide the supervisor and Controller, well in advance of the program termination date, information regarding the allowance of and the procedure for requesting a no-cost extension on a project.

M. Principal Investigator Transfer and Transfer of Equipment

The official recipient of the sponsored programs is the College; therefore, title to equipment acquired with sponsored funds vests with the grantee, the College. If the Principal Investigator leaves the College, a decision must be made as to whether or not the award will be transferred with the Principal Investigator. Principal Investigators should discuss their transfer plans with their immediate supervisor/department chair. If both the College Chancellor and the sponsor approve a transfer, the Business Office will work with the receiving institution and the sponsor to affect the transfer of the grant. Each circumstance requires individual attention so that the process represents South College’s interests appropriately while respecting the future sponsored program needs of the Principal Investigator and the sponsor’s directives.

N. Program Termination and Program Closeout

Program termination procedures vary by sponsor. The Principal Investigator should review award documentation for termination procedures and work with the Business Office to affect the termination of the award in compliance with sponsor regulations.

The program close-out process varies with each sponsor but generally involves submission of final technical and financial reports and possibly other reports—most commonly patent, invention, and equipment reports—as specified by the sponsor. The PI should contact the Business Office, if in doubt regarding reports that are due, and should make sure that all technical reports and any other deliverables required by the sponsor are completed and submitted in a timely manner. The Business Office assists in the completion of property and patent reports and submits them to the sponsor on behalf of the institution. The Business Office will close the sponsored program after all the requirements have been met and final payment has been received.

O. Program Income

Some sponsored programs generate income (e.g., from registration fees for conferences, the sale of materials developed with sponsor funds, etc.). Sponsors, especially federal agencies, may have regulations and policies about how program-generated income should be accounted for and spent.

If the products or resources provided by the grant/contract are or may be involved in the generation of income, the Principal Investigator should contact the Business Office to identify procedures for the accounting and spending of sponsored program-generated funds.

P. Non-Governmental Contracts - Industrial

On behalf of the College, the Vice Chancellor in concert with the Business Office reviews and negotiates all contracts, including agreements. Industrial agreements often require negotiations with the industrial sponsor, especially the rights to data and intellectual property. Principal Investigators considering contract work with industrial sponsors should contact the supervisor and Vice Chancellor early in the process.

Q. Records Retention

Sponsors vary regarding the length of time the College is required to maintain records. Sponsor terms may, in fact, differ from program-to-program. Typically, the College is required to retain official College records for seven years from the end of the project period and Principal Investigator records for three years. If an audit is initiated within this three-year period, records must be maintained an additional three years after audit issues are resolved.

Official records can include program records housed with the Principal Investigator, fiscal records and documentation housed with the Business Office, the official application and award file housed in the Business Office. All reports are the property of the College. Principal Investigators must notify the Business Office before any program records or files are destroyed or moved from campus.

R. Consultant and Sub-recipient Agreements

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 list of criteria is provided to assist in distinguishing between the use of a Consulting Agreement or a Subaward:

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;
Often has more autonomy in the completion of the work, within the parameters of the agreed-upon 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 or the project are met, and;	Provides similar good 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 Universities Research Administrators and OMB A133_.210

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, sub-recipient 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 budget and scope of work must be accompanied by a letter of commitment, countersigned by the sub-recipient's authorized organizational representative, and;
4. A copy of the sub-recipient's negotiated F&A rate agreement is also required.
5. For federal proposals, the subaward's Federal Tax Identification Number and DUNS number are required.

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 Sub-recipient and Consultant Agreement on grant awards

Once an award is made which requires a subaward or consultant agreement, contact the Business Office for assistance in developing the agreements. ***Only an Authorized Signatory of the Institution may sign a sub-recipient or consultant agreement on behalf of the College.***

VI. Compliance Issues: Regulatory Bodies, Policies, and Assurances

Federal guidelines require institutional approval and oversight of activities involving human subjects, animals, human body and fluids, and hazardous materials. Researchers whose projects, ***whether externally funded or not***, involve one or more of these activities should seek the appropriate institutional clearances as early in the proposal development stage as possible and ***must obtain approval before research proceeds.***

Funding organizations, particularly federal and state agencies, require numerous certifications and assurances as a part of the proposal submission and award acceptance process. Many of these are standard and simply require the signature of the College's authorizing official to certify compliance. The Principal Investigator, depending on the type of project, must initiate other clearances. Federal regulations stipulate that institutions applying for federal funds assure that appropriate federal agency that certain conditions and policies are in place and implemented at the applicant institution.

Federal funding is at risk institution-wide if individuals do not comply with these requirements. The PI and Business Office coordinates the assurance process and provides the Chancellor and/or Vice Chancellor for signatures on institutional certifications for a number of compliance issues.

A. South College Indirect Cost Policy and Procedures

Definition

Indirect Costs or Facilities and Administrative Costs (F&A) are those that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other activity or any other institutional activity.

Policy

The purpose of the Indirect Cost Policy is to provide direction for recovery of all program costs of grants by requiring that Facilities and Administrative (F&A) costs are included in the proposed budgets.

Full F&A Cost recovery is to be included in all sponsored program proposals. The F&A costs rates are set through negotiations with the federal government (Department of Health and Human Services) to recover actual expenses incurred by the College. Exceptions to the policy are made for certain proposals to the state of Tennessee and proposals where agency guidelines state that no F&A cost or less than full F&A cost will be paid. Non-federal organizations whose guidelines will not permit F&A cost will be reviewed to determine if some of the F&A items might be included as direct cost.

Exceptions to the policy are to be initiated by the PI and Department Chair and approved by the Dean, as appropriate. The exception request will then be forwarded to the Director of Sponsored Programs for review and signature. The exception will then be forwarded to the Chancellor, Vice Chancellor, and Chief Financial Officer for final approval.

Under the current budget system, indirect cost dollars are collected and managed centrally by the Chief Financial Officer and are used to provide general fund support for all the units within the College.

B. Standard Federal Assurances

Specific standard assurances are typically required by federal funding agencies. Most often, sponsors supply the institutional certification and assurance forms required. If the sponsor does not provide these, a copy of the form Institutional Certifications Regarding Lobbying; Debarment, Suspension, and other Responsibility Matters; and Drug-Free Workplace Requirements, which is located in Appendix E, can be used for institutional certification. The Chief Financial Officer's signature on the standard federal assurances indicates the College's compliance with these requirements.

Lobbying

Public Law 101-121 states that applicants for federal funding must provide the following information on any contract, grant, or cooperative agreement exceeding \$100,000:

- *Certification that no federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence a federal employee in connection with the appropriation of federal funds;*
- *Submission of Standard Form-LLL Disclosure Form to Report Lobbying (included in Appendix E) if non-federal funds are used to pay any person for influencing or attempting to influence a federal employee in connection with the appropriation of federal funds*

Debarment and Suspension

With the submission of an application for federal funding, an institution must certify or provide an explanation why it cannot certify that it and its principals, including consultants and subcontractors:

- are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;*
- are not presently indicted for or have not, within a three-year period preceding an application, 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 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; and*
- have not within a three-year period preceding an application had one or more public transactions terminated for cause or default.*

Drug-Free Workplace and Workforce

All grants or contracts made by a federal agency after March 18, 1989, require that applicant organizations assure the federal government that work on these projects will be in a drug-free workplace. As part of the certification process, institutions federally funded are required by law to develop a drug-free workplace policy, which applies to all personnel engaged in the performance of a grant or contract funded with money from a federal agency. The policy also applies to undergraduate students and graduate students paid from funds acquired directly from a federal agency.

The policy states in part that:

- the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the workplace;*
- as a condition of employment, employees must abide by the terms of the statement;*
- any employee convicted of a drug offense occurring in the workplace is required to notify his/her immediate supervisor no later than five days after the conviction.*

The policy outlines the sanctions which may be taken if an employee violates the policy. Such sanctions may include termination of employment, satisfactory completion of a rehabilitation program or suspension.

A copy of the complete Drug-Free Workplace and Workforce Policy is located in Appendix E and is available from the South College Human Resources Department.

VII. Financial Conflict of Interest

A. 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, South 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 regulation of 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 interests.”

Scope. The following statement of the policy applies to South College investigators applying to or holding a grant from federal sponsors.

B. 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 Interests (SFI): Financial interests of the investigator (and those of investigator’s spouse and dependent children) that reasonably appear to be related to the 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.

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.

C. Guidelines:

1. Each investigator is required to disclose the following Significant Financial Interests:

- 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
- 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 South College grant routing sheet to the director of sponsored programs and research.

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 programs and research 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 interests 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 Vice Chancellor. The Vice Chancellor shall determine what conditions or restrictions, if any, should be imposed by the institution to manage actual or potential conflicts of interests arising from disclosed significant financial interests.

5. Prior to consideration by the Vice Chancellor, 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 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 Vice Chancellor 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 South College and 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 chief academic officer.

7. The Vice Chancellor 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.

D. 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.

E. Records

Records of the investigator, financial disclosures, and of actions taken to manage actual or potential conflicts of interest shall be retained by the Business Office 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.

VIII. GRANT RELEASE TIME

A. Definition: Grant Release Time: is generated when a full-time South College employee under contract to the College works on a grant (during the fall, spring, and/or summer quarters) and accordingly charges a portion of his or her salary to the grant. The release time funds remain with the academic department where the employee is assigned.

Within South College the following schools/units/departments will abide by the percentage and hours regarding Grant Release Time:

In the *Department of Pharmaceutical Sciences*, the Department Chair makes teaching assignments such that the average, full-time teaching load is **60 didactic contact hours per academic year** (comprised of four consecutive quarters); and the maximum full-time teaching load for any individual faculty member should not exceed **120 contact hours** per academic year.

Teaching faculty with active, externally- funded research should have a minimum, **40%** teaching load (i.e., 48 contact hours) each academic year unless an exception is required.

In the *Department of Pharmacy Practice*, the Department Chair makes teaching assignments such that the average, full-time teaching load is **4 hours** per quarter; teaching assignments are not to exceed **5 hours** or the equivalent.

With active, externally-funded research, a teaching faculty member should have a minimum, **40%** teaching load each quarter, unless an exception is required.

In the *School of Business Administration*, the dean makes the teaching assignments so that the average teaching load for full-time is **16 hours** per quarter; teaching assignments are not to exceed **16 hours** or the equivalent.

With funded research, a teaching faculty member must have at least **50%** teaching load each quarter, unless an exception is required.

In the *School of Physician Assistant Studies*, the department chair makes the teaching assignments so that the average teaching load for full-time is **20 hours** per quarter; teaching assignments are not to exceed **20 hours** or the equivalent.

With funded research, a teaching faculty member must have at least **40%** teaching load each quarter, unless an exception is required.

Release time begins at the time the official award notification has been received and the account has been established in the Business Office. If this occurs several weeks after the quarter begins, a replacement should be hired. The College will maintain a reserve fund in overhead to cover charges while waiting for grant funding once notification has been received.

B. Eligibility

Full-time employees (teaching faculty, administrative faculty, administrators, and staff) may be approved for Grant Release Time from portions of their responsibility to enable their participation in sponsored research or sponsored programs activities at the College. Grant release time **must be** approved several weeks prior to the submission of the proposal Vice Chancellor (**use Pre-approval Form in Appendix A**). Approval for such release time is at the discretion of the dean/department chair/immediate supervisor, with approval by the dean and Chief Academic Officer. Approval is based upon the best interest of the College as well as the availability of funding to offset the hiring of adjuncts, graduate assistants, undergraduate assistants, staff, or faculty that may be necessary to fulfill part of the normal teaching, academic support, or administrative assignment of the College employee working on the project.

Teaching Faculty Release Time

Faculty who wish to be released from a three-credit-hour course during a quarter must request 25% of their regular base salary (12.5% of their academic year salary) and associated fringe benefits from an external funding agency to secure this release time.

Faculty who wish to be released from a four-credit-hour course during a quarter must request 33% of their regular salary (16.5% of their academic year salary) and associated fringe benefits from an external funding agency to secure this release time.

Administrative Faculty and Administrator Release Time

In order for individuals who have full administrative responsibilities to be released to provide administrative or technical oversight for a research project or sponsored program activity, the administrative faculty member or administrator must have included his or her percentage of effort and associated fringe benefits in the proposal for the amount of time he or she will participate in the project.

Staff Release Time

One day per week is equal to 20% of a staff member's time. Using this percentage as a base, the dean may determine how much time a staff member may devote to a sponsored project. Once a percentage of effort is determined and approved, this percentage is applied to the staff member's annual regular base salary to determine how much to charge to an external funding agency for the staff member's release time and associated fringe benefits.

C. Use of Grant Release Funds

The department must use some of the funds resulting from the grant release time for instructional faculty to support the work the faculty member left vacant by the grant release time allocated. The department chair may only use the resulting funds to support adjunct faculty, graduate assistants, undergraduate assistants, or faculty overloads. Student assistants may be hired to provide supplemental instructional including tutoring, grading papers, or conducting recitations. The department chair determines who will be hired using these funds. The funds may not be transferred to operational support such as supplies, travel, equipment, or non-personnel lines. In the case of administrative or staff personnel must be used to hire someone to support the work of the administrative or staff personnel left vacant by the grant release time allocated.

South College hiring guidelines must be followed in hiring replacement staff for the work vacant by the PI/PD or Co-Principal Investigator (CI). Additionally, the PI/PD and/or CI should contact the Business Office regarding other policies that must be followed regarding these funds.

D. Compensation

Full-time and part-time faculty employment supported from sponsored program funds are time limited. Therefore, permanent salary support for a position cannot be supported from grant funds.

Teaching Faculty Compensation

Faculty working on a grant or contract during the academic year period cannot earn more than his or her regular base salary from the grant for the academic year (August-May) or the specific contract period. Faculty members are required to charge to the grant that portion of their salary directly related to their work effort on the grant, per the approved budget.

Administrative Faculty and Administrator Compensation

Administrative faculty members administrators working on a grant or contract during the academic period cannot earn more than their regular base salary (whether they are on a 10-, 11-, or 12- month contract) from the grant. Administrative faculty members and administrators are required to charge that portion of their salary directly related to their work effort on the sponsored project, per the approved budget.

For summer salary, administrative faculty members and administrators are compensated in a similar fashion as the teaching faculty members are, but based on the length of their contracts. For example, a ten-month, eleven-month, or twelve-month administrative faculty member and administrators may earn up to 1/10, 1/11, or 1/12, respectively, of his or her regular base salary during one summer month.

Staff Compensation

Staff members working on a grant or contract will be compensated for the percentage of effort that they participate on the sponsored project, per the approved budget.

NOTE (PERSONNEL BUDGET ACTION FORM): At the beginning of a new budget period or when an account number has been changed, a new Personnel Budget Action Form must be prepared reflecting the new account number and the effective date of action. This provides an audit trail for the funding source(s) of the salary of the College employee, and the salary will be charged to the appropriate account(s).

Faculty working on a grant during the summer must prepare a Personnel Budget Action Form to indicate the employment period and the monthly rate of pay, which cannot exceed 1/9 of their regular base salary.

At the end of the grant, a Personnel Budget Action Form must be prepared by PI/PD in consultation with the chair to return the College employee to 100% on College funds or to identify a new salary funding source.

NOTE (CERTIFICATION OF TIME AND EFFORT REPORT): Work performed as a result of release time must be documented in the following manner: the Certification of Time and Effort Report must be completed and filed monthly with the Business Office as documentation of effort worked each month throughout the life of the grant.

Replacement Personnel such as teaching faculty, administrative faculty, administrators, and staff members who are hired to assume teaching or administrative responsibilities for college personnel must be hired using college funds resulting from approved release time. Compensation for the replacement faculty will be calculated on a per-course basis using the established rate of pay for that course in the department. Part-time administrative salaries for personnel other than teaching faculty will be calculated on the basis of the administrative functions that are prepared and will be consistent with the percentage of approved release time in the grant.

NOTE: Compensation for the replacement faculty or staff is not the requested salary in the grant.

The Business Office will contact the PD/PI three months before termination of the grant to determine the intent of completing the grant by the original termination date or the need for an extension. If the grant will be completed per the original termination date, any 100%-grant-funded positions must be terminated if no other funding source is identified. If the grant is to be extended, then the PD/PI must ensure that the appropriate forms, including a Personnel Budget Action Form to remove the person(s) from the payroll or continue their employment.

E. Business Processes (Assumes that the appropriate % effort and release time is included in the grant)

At the beginning of the development of a grant funded proposal and budget, the prospective PI/PD or CI should complete the Grant Routing Form and the Grant Release/Pre-approval Form (Appendix A) listing all effort proposed by the college employee in order for release time to be considered. If there is a need for space, in-kind or matching costs that are required to implement the project, the two forms should be signed by the appropriate administrators, as is appropriate. After this has been done, the proposal writer should complete the development of the proposal.

After the notification of the award has been received and the budget established by the Business Office, prepare personnel budget action form to indicate the appropriate funding source(s) for the college employee's salary and the correct percentage for each source (college funds or grant funds) during the course of the sponsored program activity.

NOTE: The personnel being released to participate on the grant will be paid the dollar amount for the percentage of effort that was approved in the proposal budget. The released college dollars will be used to hire replacement personnel.

Appendix A

Guides/Forms for Proposal Development and Submission

- **Elements of a Proposal**
- **Proposal Budget Checklist**
- **South College Proposal Submission Procedures**
- **South College Routing and Approval Form for Sponsored Programs and Research**
- **Pre-Approval Form for Grant Release Time**
- **Grant Release Request/Approval Form**

Grant Proposal Elements and Format

Proposed To – name and address of the funding source.

Proposed From – name and address of you and your organization.

Table of Contents – a table of contents page with page numbers for each of the following sections:

Abstract – a one-page synthesis of the elements in the entire proposal, a brief description of all the components of your project.

Problem Statement – a description of the problem, using risk and frequency assessments from legitimate sources that will state the extent of the problem.

Literature Review – a reference librarian will be priceless for this portion of your research. You will need to do a thorough search in all of the publications, professional journals, and demographic resources to demonstrate you have a professional understanding of the problem.

Methods – describe the methodology, activities, and resources you will use to complete research, initiate a social program, improve a social program, or implement resources requested from funding sources.

Evaluation – provide a means of demonstrating that the funding has achieved progress toward goals of alleviating the problem in the problem statement.

Budget – a detailed budget must be provided, done in a format that is easily understood by the funding sources grant proposal committee, including each person working for the project, contracted work, fixed and variable costs and supplies that will be necessary.

Budget Justification – a detailed rationale of why each component of the budget is necessary.

Project Personnel – Resumes and descriptions of the key project personnel and their qualifications to administer the project; smaller community projects require far less qualifications than a national program, of course.

Bibliography – a bibliography of all of the referenced material and resources in the problem statement and methodology section.

Exhibits – any materials you will use in your research project or program that you can demonstrate in hard copy such as tests, pictures, or diagrams.

Proposal Budget Checklist

General

1. Is your budget prepared according to the agency's guidelines?
2. Has enough money in each expense category been requested so that the project can be properly executed?
3. Have budget computations been double-checked for accuracy and do all of your budget figures balance?
4. Have you itemized each category of expenditure and are appropriate items described and/or justified in the narrative and/or budget justification page?
5. Have you explained any unusual expenditure in the narrative and/or budget justification page?
6. Have you itemized each College contribution to the project, both cost-sharing and matching funds? Have these items been approved and allocated by the appropriate administrators?
7. Have all the following items been accounted for if relevant: salaries for principal investigator(s); wages for undergraduate assistants; salaries for secretarial and technical assistance; payments to consultants; travel and per diem costs, building rental costs; equipment costs; cost of expendable supplies; long-distance telephone charges; mail costs; duplication costs; publication costs; costs of specific supplies (for example: magnetic tape, film, batteries); data processing costs; and so on?
8. Has excess "fat" or "padding" been trimmed from the budget while still allowing for normal inflation of items?

Personnel

1. Are salary rates compatible with current salary ranges?
2. If faculty-staff salaries are to be part of the cost-sharing contribution, have they been figured accurately and has approval been obtained?
3. Does the budget provide for salary increases if the project period extends over more than one quarter starting October 1st?
4. Does the budget include proper support for fringe benefits?
5. Have staff positions and the proportion of time being committed to the project by the principal investigator and others been cleared with the appropriate administrators?

Equipment

1. Have you checked with your unit and other units on campus to determine if needed equipment is presently available?
2. Is equipment purchase allowed by the sponsor?
3. Have you checked with appropriate sources for information on equipment costs, vendors, procedures for purchase, and so on?

4. Have you included the cost of delivery, installation, and auxiliary parts in the purchase price? Have you considered increases in cost in the purchase price? Have you considered increases in cost if purchase will not be made until sometime in the future?
5. Have you included the cost of maintenance, service agreements and insurance (when appropriate) in the “other direct costs” budget category?
6. Have you included an itemized listing of equipment (including type of equipment, specific name, model number, price, vendor, and so on) either in the budget form or budget justification page?

Expendable Equipment and Supplies

1. Have you provided for adequate expendable equipment and supplies to complete the project?
2. If substantial funds have been requested in this budget category, have an itemized list and justification been included?

Travel

1. Have you followed the College’s, agency’s, or other applicable regulations for allowable rates for travel and per diem expenses?
2. Have you included adequate travel in your budget to complete the project, including possible travel to meetings or conferences?
3. Have you itemized and justified your planned travel, including destination and purpose?
4. Have you allowed for future increases in costs for transportation?
5. Have you included all types of travel expenses, that is, transportation, per diem, and local travel?

Other Costs

1. Publication costs – have you itemized publication costs such as page charges, special photography layouts, purchase of books, reprints, abstracts, library searches, conference proceedings, and so on?
2. Computer costs – have you requested the full cost of computer services?
3. Other direct costs, if pertinent - have you itemized expenses for items such as: space rentals at sites other than the College?
4. Shipping of material?
5. Communications (telephone, long-distance charges, postage, etc.)?
6. Equipment rental, maintenance, or service agreements?
7. Temporary secretarial assistance?
8. Subcontracts?
9. Consultant fees?

South College Proposal Submission Procedures

South College encourages faculty and staff to engage in scholarship, professional development, and sponsored program activities. The College promotes the acquisition of external support for these endeavors. Listed below are established procedures for the solicitation of sponsored projects at South College. All grant and contract applications for external funding must be submitted through the Business Office.

THE ONLY AUTHORIZED SIGNATURES FOR THE COLLEGE ARE THOSE OF THE VICE CHANCELLOR AND CHANCELLOR

Processing of requests from College employees to seek external funding involves the following steps:

1. Project Director: The Project Director/Project Administrator/Principal Investigator for the project/sponsored activity is responsible for initiating the submission process by completing a South College Proposal Routing and Approval Form and submitting it, along with a complete copy of the proposal, to his/her department chair. The Project Director is also responsible for ensuring that the proposal is routed through the campus process (steps 2-4 below) and delivered to the Vice Chancellor for review.
2. Department Authorization: Department chairs are responsible for initial review to ensure that the proposed project is feasible with respect to personnel and material resources and that the proposed project is appropriate to the mission of the department. Signature of the Department Chair will signify approval of any department commitment for matching funds.
3. Project Director: Submits proposal to the Vice Chancellor for further review.
4. Proposals will be reviewed for compliance with the agency/sponsor guidelines, College, state, and federal policies by the PI. After the initial review, the proposal, is routed as needed, to the following: (1) Dean, (2) Vice President for Information Technology/Facilities if the proposal involves any acquisition and /or modification of physical facilities (3) Chief Financial Officer and (4) Vice Chancellor (5) Chancellor.
5. Designated Campus Official Authorization: The Designated Campus Official (The Chancellor) reviews the proposal for consistency with college/school mission and availability and commitment of support services, including time, space and matching funds after all other approvals have been secured.
6. The signed proposal will then be returned to the PI for submission to the agency/sponsor unless prior arrangements have been made with the Office of the Vice Chancellor to assemble and mail the proposal.

Note: Proposals are to be submitted to the Vice Chancellor AT LEAST TWO WEEKS PRIOR TO THE AGENCY/SPONSOR DEADLINE.

South College

GRANTS & PROPOSALS ROUTING SLIP

INTERNAL DOCUMENT

All proposals for external grants and contracts must have the appropriate signatures as indicated below at least two weeks prior to the deadline for submission to the funding agency. The Chancellor will sign only after all appropriate persons have signed

Please complete and return to Vice Chancellor with a copy of the RFP and the final proposals.

Funding Agency: _____

Project Title: _____

Project Purpose: _____

Total Budget Request: \$ _____

Project Timeline: _____ **Start Date** _____ **End Date** _____

Award Notification Date (Approximate): _____

Faculty/Principal Investigator Name and Signature _____ **Date** _____

Unit Head Chair Signature _____ **Date** _____

Dean _____ **Date** _____

Director, OSPR _____ **Date** _____

Chief Financial Officer _____ **Date** _____

Vice Chancellor _____ **Date** _____

Chancellor _____ **Date** _____

GRANTS OFFICE USE ONLY:

Award Date	Program Reporting Date(s) Financial Reporting Date(s)
Denied Date	Evaluation Received:

Appendix B

Policies/Forms for Common Certifications

- **Assurances, Non-Construction Programs**
- **Institutional Certifications Regarding Lobbying, Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements**
- **Certification of Eligibility for Federal Assistance in Certain Programs**
- **Disclosure Form to Report Lobbying (Standard Form LLL)**
- **Instructions for Completion of SF-LLL, Disclosure of Lobbying Activities**

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

<p>* SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>Completed on submission to Grants.gov</p>	<p>* TITLE</p> <p><input type="text"/></p>
<p>* APPLICANT ORGANIZATION</p> <p><input type="text"/></p>	<p>* DATE SUBMITTED</p> <p>Completed on submission to Grants.gov</p>

Standard Form 424B (Rev. 7-97) Back

**CERTIFICATIONS REGARDING LOBBYING; DEBARMENT, SUSPENSION AND OTHER
RESPONSIBILITY MATTERS; AND DRUG-FREE WORKPLACE REQUIREMENTS**

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Signature of this form provides for compliance with certification requirements under 34 CFR Part 82, "New Restrictions on Lobbying," and 34 CFR Part 85, "Government-wide Debarment and Suspension (Nonprocurement) and Government-wide Requirements for Drug-Free Workplace (Grants)." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Education determines to award the covered transaction, grant, or cooperative agreement.

1. LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 34 CFR Part 82, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 34 CFR Part 82, Sections 82.105 and 82.110, the applicant 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 Form to Report Lobbying," in accordance with its instructions;

(c) The undersigned 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 subrecipients shall certify and disclose accordingly.

**2. DEBARMENT, SUSPENSION, AND OTHER
RESPONSIBILITY MATTERS**

As required by Executive Order 12549, Debarment and Suspension, and implemented at 34 CFR Part 85, for prospective participants in primary covered transactions, as defined at 34 CFR Part 85, Sections 85.105 and 85.110--

A. The applicant certifies that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three-year period preceding this application been convicted of or had a civil judgement 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;

(e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (2)(b) of this certification; and

(d) Have not within a three-year period preceding this application had one or more public transaction (Federal, State, or local) terminated for cause or default; and

B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

**3. DRUG-FREE WORKPLACE
(GRANTEES OTHER THAN INDIVIDUALS)**

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 CFR Part 85, Subpart F, for grantees, as defined at 34 CFR Part 85, Sections 85.605 and 85.610 -

A. The applicant certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an on-going drug-free awareness program to inform employees about:

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position

title, to: Director, Grants Policy and Oversight Staff, U.S. Department of Education, 400 Maryland Avenue, S.W. (Room 3652, GSA Regional Office Building No. 3), Washington, DC 20202-4248. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted:

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certifications.

NAME OF APPLICANT	PR/AWARD NUMBER AND / OR PROJECT NAME
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	
SIGNATURE	DATE

**DRUG-FREE WORKPLACE
(GRANTEES WHO ARE INDIVIDUALS)**

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 CFR Part 85, Subpart F, for grantees, as defined at 34 CFR Part 85, Sections 85.605 and 85.610-

A. As a condition of the grant, I certify that I will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant; and

B. If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, I will report the conviction, in writing, within 10 calendar days of the conviction, to: Director, Grants Policy and Oversight Staff, Department of Education, 400 Maryland Avenue, S.W. (Room 3652, GSA Regional Office Building No. 3), Washington, DC 20202-4248. Notice shall include the identification number(s) of each affected grant.



Certification of Eligibility for Federal Assistance in Certain Programs

I understand that 34 CFR 75.60, 75.61, and 75.62 require that I make specific certifications of eligibility to the U.S. Department of Education (ED) as a condition of applying for Federal funds in certain programs and that these requirements are in addition to any other eligibility requirements that ED imposes under program regulations. Under 34 CFR 75.60 – 75.62:

I. I certify that:

A. I do not owe a debt, or I am current in repaying a debt, or I am not in default (as that term is used at 34 CFR Part 668) on a debt:

1. To the Federal Government under a nonprocurement transaction (e.g., a previous loan, scholarship, grant, or cooperative agreement); or
2. For a fellowship, scholarship, stipend, discretionary grant, or loan in any program of ED that is subject to 34 CFR 75.60, 75.61, and 75.62, including:

- Federal Pell Grant Program (20 U.S.C. 1070a, et seq.);
- Federal Supplemental Educational Opportunity Grant (SEOG) Program (20 U.S.C. 1070(b), et seq.);
- State Student Incentive Grant Program (SSIG) (20 U.S.C. 1070c, et seq.);
- Federal Perkins Loan Program (20 U.S.C. 1087aa, et seq.);
- Income Contingent Direct Loan Demonstration Project (20 U.S.C. 1087a, note);
- Federal Stafford Loan Program, Federal Supplemental Loans for Students [SLS], Federal PLUS, or Federal Consolidation Loan Program (20 U.S.C. 1071, et seq.);
- William D. Ford Federal Direct Loan Program (20 U.S.C. 1087a, et seq.);
- Cuban Student Loan Program (20 U.S.C. 2601, et seq.);
- Robert C. Byrd Honors Scholarship Program (20 U.S.C. 1070d-31, et seq.);
- Jacob K. Javits Fellows Program (20 U.S.C. 1134h-1134i);
- Patricia Roberts Harris Fellowship Program (20 U.S.C. 1134d-1134g);
- Christa McAuliffe Fellowship Program (20 U.S.C. 1105-1105i);
- Bilingual Education Fellowship Program (20 U.S.C. 3221-3262);
- Rehabilitation Long-Term Training Program (29 U.S.C. 774(b));
- Paul Douglas Teacher Scholarship Program (20 U.S.C. 1104, et seq.);
- Law Enforcement Education Program (42 U.S.C. 3775);
- Indian Fellowship Program (29 U.S.C. 774(b));
- Teacher Quality Enhancement Grants Program (20 U.S.C. 1021, et seq.);

OR

B. I have made arrangements satisfactory to ED to repay a debt as described in A.1. or A.2. (above) on which I had not been current in repaying or on which I was in default (as that term is used in 34 CFR Part 668).

II. I certify also that I have not been declared by a judge, as a condition of sentencing under section 5301 of the Anti-Drug Abuse Act of 1988 (21 U.S.C. 862), ineligible to receive Federal assistance for the period of this requested funding.

I understand that providing a false certification to any of the statements above makes me liable for repayment to ED for funds received on the basis of this certification, for civil penalties, and for criminal prosecution under 18 U.S.C. 1001.

(Signature)

(Date)

(Typed or Printed Name)

Name or number of ED program under which this certification is being made: _____

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i>	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity 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 a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10.
 - (a) Enter the full name, address, city State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.
 - (b) Enter the full names of the individual(s) performing services, and include full address if different from 10(a). Enter Last Name, and Middle Name (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minute per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.