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Introduction

Seton Hall University (SHU) is committed to fostering an environment that encourages intellectual creativity and inquiry. Faculty members and administrators are encouraged to pursue scholarly, training and service activities that contribute to their disciplines and fields. The scholarly and service activities of the faculty and administration are expected to reflect and sustain the academic goals and mission of the University. The University also encourages the participation of students in sponsored research and other sponsored activities.

The *Principal Investigator Handbook's* primary goal is to help any Principal Investigator (PI), Project Manager (PM), or project staff to navigate the grant cycle from application to close-out of an award administered by SHU

GRANT MANAGEMENT CYCLE

PRE AWARD	POST AWARD
OFFICE OF GRANTS & RESEARCH	GRANTS ACCOUNTING OFFICE OF GRANTS & RESEARCH

Find Funding
Review RFP/RFA
Proposal Development
Budget Development
Proposal submission
Award Negotiation
Award Receipt

Project Startup

Award Close-out
Close budgets
Prepare fiscal reports for sponsors
Compliance
Award Management
Apply cash
Invoice sponsor
Establish budgets

Figure 1.1 Grant Management Cycle

While **Seton Hall University (SHU)** is the **legal** recipient of the award on behalf of the campus, **You** are accountable for the proper fiscal management and conduct of the project. If you fail to abide by the policies of the sponsor, and SHU you may be held liable. The Grants and Research Office (OGRS) central mission is to ensure that each PI or anyone assisting those individuals has the necessary tools at his/her disposal to manage a successful project.

Using this Handbook

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

The reference materials provide explanations of the most frequent questions and issues. This guide will attempt to explain every step involved in administering a sponsored project. This handbook provides links to important and detailed information to help you comply with federal and organization rules and regulations.

A few other additional items have been included:

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

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

- **OMB Regulations** – information and link

Do not hesitate to contact the Grants and Research Office should you need assistance in any phase of your project. (grantsoffice@shu.edu)

SHU Research/Office of Grants and Research Services
https://www.shu.edu/grants-research-services/

General Information

Roles and Responsibilities

SHU is the legal recipient of the award. You are **accountable** for the proper **fiscal management** and **conduct** of the project.

Role	Responsibilities
Principal Investigator Please also review Appendix E for PI Eligibility	When you function as a funded researcher, you assume fiscal and legal responsibilities. Each Principal Investigator (PI) is responsible for assuring that the terms of the award are met, and all the applicable SHU policies are followed. You must keep in mind that sponsoring agencies, SHU, and your academic department are all stakeholders in your success, and each may have specific requirements they wish fulfilled. Generally, a PI must: • Conduct and manage the technical research • Comply with all applicable federal, state and university policies,procedures, and laws • Comply with all terms and conditions of the sponsored award • Manage project funds efficiently and effectively within approved budgets • Ensure that the project is completed in a professional manner • Accept fiscal responsibility on behalf of his/her department, administrative unit, and/or campus in the case the project is overextended, or an unauthorized expenditure is disallowed by the auditors* *In such cases the academic unit must cover the cost

Role	Responsibilities
Grants and Research Office	The primary mission of the Office of Grants and Research Services (OGRS) is to promote extramural funding of research and scholarly activity and to help you, either individually or as part of a group, by • Providing administrative services to help meet the requirementsof the sponsor, and the University • Ensuring you are protected from any undue harm prior to the acceptance of a sponsored program • Verifying that the project does not o Challenge institutional integrity o Threaten your academic freedom, or o Overburden you with management procedures • Protecting the campus from additional conflicts by making certain no unnecessary risks and liabilities are undertaken • Ensuring proper stewardship of sponsored funds • Creating mechanisms for accountability • Developing procedures for the proper use of sponsored funds • Interpreting sponsor's rules • Establishing compliance with public policies • Filing assurances and certifications regarding regulatory compliance, and • Serving as the official liaison between the campus, and the funding agency • Aid with the online submission of proposals, and generally OGRS submits the proposals.

Office of Corporate and Foundation Relations	The Office of Corporate and Foundation Relations (OCFR) is charged with managing relationships with corporate and foundation donors and prospects on behalf of the University. - disseminates RFPs based on interest areas to department contacts - researches prospective funders and develops funding strategies for approaching funders - works with faculty to develop grant proposals at all stages of the proposal development

Additional Involved Parties

The following parties are also involved in your project.

Office of Grants and Sponsored Accounting

The Office of Grants and Sponsored Accounting (OGA) is responsible for monitoring and executing the post-award administration of sponsored activity for the University. To accomplish this task, the Office of Grants and Sponsored Accounting maintains:

- o an effective grants management system to monitor compliance with fiscal and reporting requirements as established by Federal and State law, agency regulations, University policy and procedures, and generally accepted accounting standards,
- o an effective cash management system to ensure the payment of obligations and the collection of funds,
- o an accurate general ledger information to ensure proper financial presentation of sponsored activity within University financial records,
- o a support structure for University personnel engaged in research.

Co-Principal Investigator/Project Director:

Other person(s) primarily responsible for the scientific, technical, and administrative conduct of a project. In this secondary role to the PI, a Co-PI:

- o Provides leadership over a specific task of the project
- o Coordinates necessary approvals, if at other institution
- o Contributes to managing the project and any reporting requirements

Collaborator:

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

Sponsor:

A sponsor is a person or entity who funds the sponsored program. There are three main types of sponsors.

- o Federal agencies
- o Other government agencies (state or local government)
- o Private entities such as foundations, corporations, or individuals

Starting Out: Proposals and Funding

Overview

You have the primary responsibility for obtaining and managing awarded funds, finding funding sources and closing out the award when research is complete.

There are many steps and offices involved with the preparation and submission of a proposal. As any proposal is a contract between the University and the sponsor, with all the legal requirements of a contract, multiple reviews are required. The Grants and Research Office (OGRS), Office of the Provost, and ultimately the Provost, is responsible for ensuring that all sponsored projects are completed according to the agreement(s) specified in the proposal. The Grants and Research Office (OGRS) can assist you in all aspects of any phase during the grant process.

Once a PI has an idea and/or has identified a potential sponsor, OGRS, or OCFR, should be contacted as soon as possible to discuss the idea and/or sponsor. For Federal, State, or local governmental programs, OGRS is the best first contact point, as ultimately, the proposal must be submitted through OGRS. PI's seeking funding from corporate or private foundation sponsors can contact OGRS or OCFR, but preferably both.

Developing a Concept

In the earliest stage of a project, the researcher must develop an idea into a clearly articulated goal that answers the question, "What do you, the researcher, hope to accomplish with the completion of this project?" This overarching goal forms the backdrop for presenting a proposal that can successfully describe a solid and realistic work plan and budget and provide some assurance to the sponsor that the award will be used to its best potential advantage.

In developing the ideas for a project, a PI should be able to provide quick, simple answers to the following questions.

- What will the research accomplish?

- How much will it cost?

- How much time will it take?

- What is the plan for completing the research?

- How will results be evaluated?

- Why should you, rather than someone else, do this project?

- What has been done already in the area of the project?

- What difference will the project make to the institution, the discipline, the students, or other identified categories?

Proposals should be concise when responding to a solicitation. Contact the program officer at the sponsoring agency for details as you develop your concept and subsequent proposal. Also consider getting input from peers prior to discussing new lines of research you have developed.

Looking for Funding

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

View Common Sites

The OGRS website facilitates grant research efforts of the Seton Hall community by providing quick links to some of the most useful databases of funding sources. Your own internet searching using Google or other search engines with key phrases such as "grants for your topic" and the like are a good place to start.

- **Public Funding** sources such as Federal and State Government agencies (e.g., www.grants.gov or https://www.nj.gov/education/grants/opportunities/)

- **Private Funding** sources, many noted in the Foundation Center database (http://candid.org/)

Identify a Good Solicitation

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

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

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

- Contact the sponsor: studies have shown that the best thing a PI can do to increase their chances of getting funded is to contact the program officer. Program officers can provide up to date information about available funds, discuss your project with you and how it would or would not fit into their program, and possibly even read a summary or draft of your proposal.

- Read the sponsor's guidelines and procedures: This is where you should call upon the resources of the grants and research office. You may also want to ask if other investigators at your institution have been successful.

Award Types

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

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

- No substantial involvement is anticipated between sponsor and recipient during the performance of the activity.
- The award comes with terms, conditions, and/or other contractual requirements that need to be met.
- There are **budgetary restrictions** that must be followed.
- **Reports** may be required including financial reports and technical or progress reports.
- Documentation of **expenditures**.
- **Deliverables** of any kind, including the sharing of research results.
- There is a start and stop date.

A **CONTRACT** is defined as a binding agreement between parties for the purpose of securing goods or services. In general, the following characteristics describe a contract:
- There is **extensive input from the sponsor** into the tasks to be performed.
- The **award mechanism** used by the sponsor is a **contract**.
- There are **contractual requirements** that must be met
- **Budgetary restrictions** must be followed
- The principal purpose is for direct benefit or use by the sponsor.
- The sponsor requires **formal reports of any kind**, including financial or technical.
- Invoicing or billing is required.

The contracting mechanism also has terms and conditions such as
- Ownership of intellectual property.
- Right of first refusal, or right of first negotiation of **intellectual property**.
- Ownership or access to **research results**.
- **Publication review** of faculty, graduate student, or post doc research.
- **Deliverables** of any kind.
- There is a start and stop date.

A **GIFT** is defined as any item of value given by a donor who **expects nothing of significant value in return**, other than recognition and disposition of the gift in accordance with the donor's wishes. In general, the following characteristics describe a gift:

- No contractual requirements are imposed and there are no "deliverables" to **the donor**. However, the gift may be accompanied by an agreement that restricts the use of the funds to a particular purpose.

- **A gift is irrevocable**. While the gift may be intended for use within a certain timeframe, there is no specified period of performance or start and stop dates.
- There is no formal fiscal accountability to the donor.

A **SUBCONTRACT** is an agreement between your institution and another where you are not the primary award recipient. Typically, in these agreements, you are performing a piece of a larger project which was awarded to the other institution. A subcontract specifies the terms between the two institutions and outlines what you are expected to do as well as providing the budget for your work.

Other types of agreements are Cooperative Agreement, Clinical Trial, Vendor, Data Use, Material Transfer, or Consulting agreements. All these agreement types are typically funded as contracts.

Developing Proposals

Application Guidelines

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

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

Letter of Intent (LOI)

Some funding opportunities require that you send a letter of intent before you apply. A Letter of Intent/Inquiry (LOI) is an opportunity to introduce your proposed project to a funder and to elicit feedback that hopefully leads to an invitation to submit a full proposal. LOI is a non-legally binding document that may include an introduction to your project, contact information of SHU, a description of our organization, a statement of need, your methodology and/or an achievable solution to the need, a brief discussion of other funding sources and a final summary.

LOIs will follow the same process as any other proposal submission. All submissions must be submitted via the Cayuse System.

Key Components

It is important to be familiar with the application guidelines. Carefully follow all instructions, including small details such as font size and page limitations. Unless the PI has spoken with a Program Officer and received special permission in writing, all application materials must be submitted by the specified due date. The key components of a typical proposal are described below.

Budgeting

The budget should include any costs associated with the successful completion of the project. It must be as accurate as possible. It is typical to use a 2% - 3% annual increase in costs for all personnel salaries. Propose a modest budget and include a line by-line justification or narrative of major purchases and personnel.

- All costs need to be **reasonable**.

- All costs must be **allowable**. There are some rules regarding what allowable costs are. The OGRS can help to identify those rules.

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

To help you begin the development of your budget, below is a list of the more common budget items and some guidance for each.

Personnel Costs

SHU is legally obligated to properly classify workers based on the criteria listed below. *You* are required to ensure that personnel budgeted in an application are properly classified.

A project may incur significant delays if an error is made in the application budget and then must be changed during the post-award phase of the project. To avoid these unnecessary delays budget employees and consultants using the following guidelines:

- **Employee versus Consultant**
  In general, an *employee* is someone whose primary employment is as an SHU employee

  A *consultant* does not have an SHU appointment and will provide specific and measurable outcomes to a specific task in a separate scope of work. Examples include delivery of a training curriculum, review and opinion of experiment results, or establishment of a clinical trial protocol on behalf of a clinical research organization.

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

- **Fringe Benefits**
  A benefits package for being employed by the institution. Most employees of a project will

receive fringe benefits. Carefully consider the time frame of the project. This will allow you to determine which fringe benefit rate to use.

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

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

Calculation

Release time/Course buyouts (**Academic Year – 9 months)** Course buyouts allow an investigator to reduce his or her course-load for the academic year to dedicate him/herself to the research set forth in a proposal. Coordinating with the Department Chair or unit head, investigators may request funds to "buy-out" a course that he/she would be teaching during the academic year. Each course buy-out should be calculated at 4.17% (one-credit course teaching) of the investigator's academic year base salary. No faculty will be allowed to reduce their teaching loads to zero in any semester. (Please refer to Appendix A for details)

Release Time/Course buyouts (**Academic Year – 12 months**) Course buyouts allow an investigator to reduce his or her course-load for the academic year to dedicate him/herself to the research set forth in a proposal. Coordinating with the Department Chair or unit head, investigators may request funds to "buy-out" a course that he/she would be teaching during the academic year. Each course buy-out should be calculated at 4.17% (one-credit course

One Institutional Credit (IC) = .75x (Institutional Base Salary/18)
One Release Time Credit (RTC) = .75xIC = 4.17% of the IBS

Equipment

The federal definition for equipment is something with a useful life of one year or more and with a unit cost of $3,000 or more. General purpose equipment is used for research purposes but also for nonscientific and non- technical purposes. Some sponsors will have different criteria for equipment which you will need to use. Items with a lower cost, including computers, should be included in the materials and supplies budget line.

Each item of equipment should be justified in terms of its importance to the project and its current unavailability at Seton Hall. Estimates of the cost of each item of equipment should be based on a catalogue, telephone, or written quotation. University policy requires that capital equipment with a value of over $10,000 be competitively bid with at least three bidders. While this is not required at the time of proposal preparation, it is advised to avoid later delays in purchasing. The estimated costs should include applicable taxes, shipping, and assembly, if necessary, and must cite academic discounts in pricing. Each item should be listed individually and described as completely as possible. Seton Hall is a 501(c)3 non-profit organization and as such is exempt from state sales tax. Purchases of capital equipment therefore may not be subject to sales tax. Major vendors will generally consider this when providing quotations. If you receive a quotation that includes sales, please inform the vendor that Seton Hall University is a tax-exempt institution.

Tuition Remission

If you include a graduate assistant or graduate research assistant is to be employed on a grant, the student's tuition and fees are generally considered a direct cost, subject to the sponsor's requirement. Most Federal programs allow budgeting of the full cost of required tuition and fees. All budgeting for graduate student support should begin by including the full cost of tuition and fees. If the sponsor or the needs of the project do not allow budgeting of the full cost of tuition and fees, a portion of the tuition and fees may be used for required cost sharing or may be provided as cost sharing for a scholarship. This must be carefully documented on the cost sharing form and approved by the appropriate Dean and OGRS. Tuition is calculated as the number of credits to be taken by the student multiplied by the Tuition per credit. Tuition and fees are not considered wages and are not subject to fringe benefits or indirect cost recovery student research assistant as part of your research team, you can budget fortuition remission.

Subrecipient (Subaward) versus Contractor

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

- A sub-awardee is an academic institution or other outside entity providing significant intellectual contributions to the proposed project. It is anticipated that a subrecipient will provide results of an entirely separate project team who will be working on a separate research question or other component that will add significant intellectual value to your overall project.

- A contractor will provide goods or services which will not require any "new" intellectual contributions to complete the work. Keep in mind that any work contracted will be fully owned by SHU, and the contractor will have no rights to the work performed.

Materials and Supplies

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

When developing your budget, it is best to also develop a detailed justification to complement the amounts you are requesting.

Travel Expenses

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

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

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

Subject Costs (Human or Animal)

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

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

Direct vs. Indirect Costs

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

Because the sponsor is providing F&A costs directly to the institution it is not acceptable to charge costs that cannot be allocated to a specific cost in a project.

Direct Costs	Can be identified specifically with a sponsored project, instructional activity, or other sponsored activity, and thus directly assigned relatively easily with a high degree of accuracy. Examples: Salaries and wages, Fringe benefits, Equipment, Supplies, Utilities,Travel or Publication expenses
Indirect Costs	Indirect costs, also referred to as overhead or Facilities and Administrative (F&A) costs, are costs that are not identifiable to any one project but are valid expenses of conducting research, instruction, and other sponsored activity programs at the University. Examples include building and equipment use, utilities, depreciation, operation and maintenance of facilities, departmental administration, student services, and administrative support offices such as Payroll, Purchasing, Accounting, OGRS, libraries, etc. All proposals with sponsoring agencies must provide for Indirect Cost recovery at the appropriate negotiated rate. When creating a budget, F&A costs are calculated as a percentage of the salaries and wages included in the personnel costs on the budget. Fringe benefits, equipment, consultant fees, or other grant costs should not be included in this calculation. Stipends for Graduate Assistants are included in the indirect cost base, but tuition is not. The limitation of indirect costs to salary and wages is typical of less-intensive research institutions. Rates are negotiated by the Controller's Office with the University's audit agency, the Department of Health and Human Services. The 2023-2024 F&A rate is 68% of all salaries and wages for on-campus projects, and 32.9% of all salaries and wages for off-campus projects. Sponsor guidelines on limiting indirect costs vary greatly. Private foundations, corporations, and some federal funding agencies may limit indirect costs or disallow them entirely. Certain government agencies, e.g., the Department of Education, no longer allow the full-negotiated rate. PIs should document the restrictions on indirect costs by referencing and providing a copy of the sponsor guidelines when completing the Intent to Apply for External Funding approval form. Any proposed reduction in indirect cost

	recovery must be approved prior to submission by OGRS.

	Allocation of Recovered Indirect Cost Recovery - The current policy for the distribution of indirect costs recovered by the University allocates the funds as follows:
	    • 45% to the General Revenue Fund
	    • 25% to the Office of the Provost
	    • 10% to the Dean of the School or College to which the PI belongs
	    • 10% to the Department to which the PI belongs
	    • 10% to the PI.
	
	Indirect costs are collected only on direct costs after they have been spent. Since indirect costs are calculated on a salary and wage base, if no salaries or wages are spent on a grant, no indirect costs are collected by the University so there is no allocation of recovered indirect costs.

Other budget considerations include project evaluation, participant support costs, insurance, project specific audit costs, and more. Please work with your OGRS to project your budget.

Budget Justification

Your project will be a success when you have the resources to adequately cover your costs. In your budget justification you want to show,in as much detail as possible, why certain costs are necessary to conduct the project. Providing a good rationale on certain items can help you provide more transparency to the application reviewers.

Compliance

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

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

Human Subjects Protections	All human subjects research, federally funded or not, must be reviewed by your campus's Institutional Review Board (IRB). Many proposal applications will ask if the research proposed involves human subjects and, if so, request the IRB approval date. Be sure to know well in advance the IRB protocol review schedule so that you can be sure to have a complete review prior to the proposal deadline.
Animal Protections	All research involving animals, whether federally funded or not, must be reviewedby the campus Institutional Animal Care and Use Committee (IACUC). Many proposal applications will ask if the research proposed involves animals and, if so, request the IACUC approval date. Be sure to know well in advance the IACUC protocol review schedule so that you can be sure to have a complete review prior to the proposal deadline.
Conflict of Interest	To ensure the validity of your research it is imperative that there be no personal financial conflict of interest, real or apparent. Be familiar with your institution's conflict of interest policy. Also be aware of your prospective sponsor's conflict of interest requirements.
HIPAA	The Health Insurance Portability and Accountability Act (HIPAA) limits the use of protected health information that is held or transmitted in any form or media whether electronic, written, or oral to protect the privacy of patient health information. If your research involves the use of individual medical records, you need to be familiar with the HIPAA guidelines.

Export Controls	These federal regulations involve the disclosure, shipment, transfer or transmission of any commodity, technology or software that is on the *Commerce Controlled List*, *Munitions List*, or the *Office of Foreign Assets Control Embargoed List* for use outside of the U.S. Prior to taking any piece of research equipment out of the U.S or sharing it domestically with a foreign national. You need to determine if it falls under any of these lists. If so, you will need to get a license prior to leaving the country. Since obtaining a license can be very time consuming, you will need to check in with OGRS early to determine if a license is needed.
Confidential/Research Data	Proprietary Data should be disclosed and marked as confidential as part of the application. Disclosure of information prior to taking the appropriate protections could limit our ability to commercialize research results.
Research Misconduct	Fabrication, falsification, or plagiarism in proposing, performing, and reviewing research or in reporting research results constitutes research misconduct. SHU has a policy and procedure for handling research misconduct. You should become familiar with both if you are a witness to such conduct. (https://www.shu.edu/grants-research-services/research-compliance.html)
Use of Hazardous Material, Blood-Borne Pathogens	Campuses conducting research where these materials are used have committees that ensure that they are used appropriately and will not pose a hazard to the research subject, researchers, or the community at large.

Compliance Training Resources

SHU provides resources to you and your project staff to learn about regulations and compliance standards. Your course completion is tracked, giving verifiable proof to sponsors of your knowledge of the subject areas. Compliance Training Modules are available at www.citiprogram.org

Submitting Proposals

Overview

Representatives in the OGRS office are designated by SHU as the primary signatory on all applications submitted on behalf of the University.

Provide a full copy of your application at least 5 business days prior to a submission deadline.

Institutional Review and Authorizations

Since the University is the legal recipient of sponsored project funds, applications must be routed through certain University offices for review and approval prior to being submitted to the sponsor. This process serves to assure the sponsor that:

• the department and school/college support the proposed project

• all regulated activities have received necessary review; and

• the University is prepared to accept funds under the terms specified.

It is required that OGRS review all sponsored project proposals prior to submission to the funding agency.

A complete proposal, including a detailed budget, must be submitted through the **Cayuse System to OGRS at least five (5) working days prior to the deadline**. OGRS reviews the proposal to assure that it complies with federal regulations and University policies and procedures, and that the proposal adheres to the requirements of the funding agency as they appear in the guidelines. The five days required by OGRS provide sufficient time to ensure that all University approvals are in order and changes to the proposal can be made if needed.

Award Acceptance and Negotiation

The OGRS negotiates and accepts all awards on behalf of the PI and the campus. The agreement terms specify the amount of the award, the start and end dates of the grant, any reporting requirements, and deliverables expected at the end of the grant period and will outline any other requirements the sponsor may have.

Post-Award Management

Overview

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

Award Establishment

The Office of Grants and Sponsored Accounting Office (OGA) will create a project specific account, after your official award notice has been accepted.

Monitoring Sponsored Award Financial Activity

You are responsible for verifying payment of all expenses submitted and ensuring there are no unauthorized charges against the award.

Awarded Budget Revisions

As you are aware, your award has a budget that has been approved by the sponsor. Part of effectively managing any award is to stay within the originally agreed upon budget parameters.

It is not uncommon to need budget category revisions. In this case, you, as the PI, cannot simply change the budget. This is because each sponsor has specific policies when it comes to making budget modifications, typically outlined in the award, which must be adhered to in the management of a project. Ifyou need to modify your budget, you must work with the OGRS to make these modifications.

Key Award Considerations

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

Project Specific Personnel

Hiring project staff may be a necessity to complete your work. SHU complies with applicable laws and regulations that have been established to maintain salary and wage equity and for the consistent treatment of all its employees. As such, some measures will be taken, during both the search and hiring process, to ensure that the final candidate was chosen fairly and has the appropriate credentials.

Before any commitments are made, verbally or in writing, you *must* contact your campus Human Resources Department to ensure you are complying with campus policies on employee hiring.

Once an employee is on the payroll, the PI must review and sign the time reporting and the leave exception reports to ensure time worked and time off are accurate. Questions regarding employee appointments and time reporting should be addressed to the campus Human Resources office.

If there are any changes to the employee status, the PI must approve these as well. The employee appointment and change of status forms must be completed in a timely manner to ensure that salary expenditures are charged appropriately to the award.

Effort Reporting

Each project budget or award will designate the amount of effort a PI and other project staff will devote to a project. If any changes are expected to your effort, you must contact OGRS immediately. Changes to effort generally have a ripple effect on the budget and can significantly affect the terms of your research agreement.

You will be required to certify your effort and the effort of your research staff for all federal and federal flow-through sponsored programs. Certifying effort requires that you acknowledge that all personnel provided effort as agreed to in the project proposal. Failure to certify employee effort on a timely basis could result in disallowances.

Purchasing

OGRS must ensure that all expenditures comply with sponsor, and campus guidelines. In addition, in accordance with *federal requirements* all expenditures must be **reasonable**, **allowable,** and **allocable** to the sponsored project. The roles of purchasing and accounts payable staff are to assist you with the purchase of necessary project items and equipment at the best price possible, establish quality relationships with suppliers that will meet project needs; and get goods, products, andservices to you as quickly as possible. You will want to ensure funds are available to support the purchases.

Travel

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

Cost Transfers

A cost transfer reassigns expenditures previously recorded in one award to another award. The award to which a cost is transferred must benefit from the goods or services related to that charge, and the charge should be allowable under sponsor guidelines.

Expenditures should be charged to the appropriate award when they are incurred. If it is necessary to transfer expenditures to a different award for *approved* circumstances, the cost transfer should occur within **90 days** of when that need is identified.

Prior to initiating a cost transfer, you should contact OGRS for guidance.

Reporting

Financial, technical, and progress reports are often required by sponsors on a fixed schedule throughout the lifetime of an award. These reports provide the sponsor with assurance that project activities are moving forward according to the terms of the agreement. The PI, is responsible for making sure

- All progress reports are submitted to the sponsor on time

- Copies of all reports, along with the transmittal letter or e-mail, have been provided to the OGRS

Failure to provide required reports can result in funding delays in multi-year awards, early termination of the award by the sponsor, and can lead SHU not being able to apply for any future awards.

The OGA is responsible for the submission of any required *fiscal* reports.

Extending Awards

Sometimes a project cannot be completed in the agreed-upon timeframe. In this case, you may need to request a no-cost extension to allow for time to finish the work. Requests for no-cost extensions

- usually include a justification and a projected budget that provides a spending plan for any unused funds

- must be coordinated with your sponsored programs officer

- should be done at a minimum of 60 days in advance of the award's termination date.

Intellectual Property

The development of intellectual property is a natural and regular outgrowth of research programs and other scholarly activities being conducted across the university. Intellectual property includes anything that is marketable, such as inventions, books, articles, study guides, syllabi, workbooks or manuals, bibliographies, instructional packages, tests, video or audio recordings, films, slides, transparencies, charts, other graphic materials, photographic or similar visual materials, film strips, multi-media materials, three-dimensional materials, exhibits, and computer software.

To **protect your work from illegal copying,** these items can be **patented, copyright protected,** or **trademarked. (Please refer to https://www.shu.edu/policies/copyright-policy.cfm)**

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

Closing Awards

Once the award period officially ends, each sponsor establishes its own deadlines for the submission of final financial and technical reports, as well as final invoices. Please be aware of, and ready to meet these deadlines. Typically, the close-out process is smooth, provided that all reports and all expenses have been thoroughly accounted for.

Appendix: Policies, Procedures, and Regulations

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

Policies and Procedures

Access the SHU policies and procedures through the links below:

- SHU policies (https://www.shu.edu/policies/)
- OGRS procedures (https://www.shu.edu/grants-research-services/policies-forms.cfm)

OMB Regulations

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

SHU has an obligation to follow the regulations provided by the federal government.

2 CFR 200

On December 26th, 2013, the US Office of Management and Budget (OMB) issued final guidance on Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards. The final guidance supersedes and streamlines requirements from OMB Circulars A-21, A-110, A-133 and 5 other circulars. 2 CFR Part 200 governs new awards. (https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1)

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

Appendix A: Subawards versus Contractor

A subaward is likely appropriate if you can answer "yes" to any of the following questions:

- Does the entity's scope of work (SOW) represent an intellectually significant portion of the programmatic effort of the overall project?

- Does the entity have responsibility for programmatic decision making?

- Could the entity's work result in intellectual property developed or publishable results (including co-authorship)?

- Will the entity need animal and/or human subjects' approvals for its portion of the work?

The following information provides tips to distinguish a subaward from the supplier situation.

If the situation involves an…	The relationship is a…
Entity selling goods or services as part of their routine business operations, usually at a fixed price or rate (e.g., pipettes, tanks of hydrogen, etc.)	Contractor
Entity using human subjects or animal subjects (and needs both the subrecipient's AND campus' IRB or IACUC approval) to do their portion of the work	Subaward
Entity conducting a survey using de-identified data, and annual IRB approval is not required	Contractor
Entity who might be a legitimate author or co-author of a paper done on the project	Subaward
Invention arising from the work done by the subrecipient	Subaward
Entity performing a test on data we provide to them and who gives us theresults to analyze	Contractor
Entity performing a test on data we provide to them and provides routine professional services in analyzing the results (e.g., a radiologist reading an X-RAY)	Contractor
Entity performing a test on data we provide to them and uses their professional expertise to contribute to generalized knowledge in new ways	Subaward

Other procurement actions may be appropriate when the contractor:

- provides the goods and services within its normal business operations

- provides similar goods or services to many different purchasers
- operates in a competitive environment
- provides goods or services that are ancillary to the operation of the RF sponsored project
- is not subject to compliance requirements of the sponsor.

Appendix B: Acronyms

Listed below are common acronyms you may see over the lifecycle of your sponsored program. This is only a portion of the full list.

Acronym	Name
AAAH	American Association for the Advancement of Humanities
AAALAC	American Association of Animal Laboratory Accreditation Council
AAAS	American Association for the Advancement of Science
AACUO	Association for Affiliated College and University Offices
ACC	Application Control Center
ACE	American Council on Education
ACLS	American Council for Learned Societies
ACO	Administrative Contracting Officer
ACS	American Cancer Society
ADAMHA	Administration on Drug Abuse, Mental Health and Alcoholism
AFDC	Aid to Families with Dependent Children
AFOSR	Air Force Office of Scientific Research
AHA	American Heart Association
AID	Agency for International Development
AOA	Administration on Aging
ARI	Army Research Institute
ARO	Army Research Office
AVA	American Vocational Association
BAA	Broad Agency Announcement
BIA	Bureau of Indian Affairs
BLS	Bureau of Labor Statistics
CAS	Cost Accounting Standards
CASB	Cost Accounting Standards Board
CASE	Council for the Advancement and Support of Education
CFDA	Catalog of Federal Domestic Assistance
CFR	Code of Federal Regulations
CIES	Council for the International Exchange of Scholars
CPB	Corporation for Public Broadcasting
CO	Contracting Officer
COP	Certificate of Proposal
COS	Community of Science
COGRS	Council on Governmental Relations
CURI	College and University Resource Institute
DARPA	Defense Applied Research Projects Agency (formerly ARPA)
DC	Direct Costs
DCA	Division of Cost Allocation (HHS)
DCAA	Defense Contract Audit Agency
DCE	Direct Cost Equivalent

DEA	Drug Enforcement Administration
DEAR	Department of Energy Acquisition Regulations
DFAR	Defense Federal Acquisition Regulations
DHHS	Department of Health and Human Services
DOD	Department of Defense
DOE	Department of Energy
DOEd	Department of Education
DOT	Department of Transportation
EDGAR	Educational Department General Administration Regulations
EDI	Electronic Data Interchange
EFT	Electronic Funds Transfer
EO	Executive Order
EPA	Environmental Protection Agency
ERIC	Education Resources Information Clearinghouse
ERA	Electronic Research Administration
ERS	Economic Research Service
ESEA	Elementary and Secondary Education Act
ETA	Employment and Training Administration
F & A	Facilities and Administrative Costs (formerly Indirect Costs)
FAR	Federal Acquisition Regulations
FDP	Federal Demonstration Partnership
FIE	Federal Information Exchange
FIPSE	Fund for the Improvement of Postsecondary Education
FMC	Federal Management Circular
FOIA	Freedom of Information Act
FR	Federal Register
FSR	Financial Status Report
FY	Fiscal Year
GAO	Government Accounting Office
GEPA	General Education Provisions Act
GPRA	Government Performance and Results Act
GSA	General Services Administration GSL Guaranteed Student Loan
HEA	Higher Education Amendment
HEARS	Higher Education Administrative Resource Service
HENA	Higher Education and National Affairs
HHS	Department of Health and Human Services
IACUC	Institutional Animal Care and Use Committee
IACP	Institutional Animal Care Program
IDC	Indirect Costs (now called Facilities and Administrative Costs)
IG	Inspector General
IHE	Institution of Higher Education
IRB	Institutional Review Board
IREX	International Research and Exchanges Board
LAR	Laboratory Animal Resources
MTA	Material Transfer Agreement

MTDC	Modified Total Direct Costs
NASA	National Aeronautics and Space Administration
NCES	National Center for Educational Statistics
NCURA	National Council of University Research Administrators
NEA	National Education Association
NEA	National Endowment for the Arts
NEH	National Endowment for the Humanities
NFAH	National Foundation on the Arts and Humanities
NIA	National Institute on Aging
NIAAA	National Institute on Alcohol Abuse and Alcoholism
NIDA	National Institute on Drug Abuse
NIE	National Institute on Education
NIH	National Institutes of Health
NIHR	National Institute for Handicapped Research
NRA	National Rehabilitation Association
NRSA	National Research Service Award
NSF	National Science Foundation
OFCC	Office of Federal Contract Compliance
OMB	Office of Management and Budget
ONR	Office of Naval Research
OSHA	Occupational Safety and Health Administration
OSI	Office of Science Integrity
PA	PrOGRSam Announcement
PETA	People for the Ethical Treatment of Animals
PHS	Public Health Service
PI	Principal Investigator
RDA	Recombinant DNA
RFA	Request for Applications
RFP	Request for Proposal
RFQ	Request for Quotation
SBA	Small Business Administration
SPA	Sponsored Programs Administration
SRA	Society of Research Administrators
TDC	Total Direct Costs
TGA	The Grant Advisor
UBIT	Unrelated Business Income Tax
USC	United States Code
USDA	United States Department of Agriculture

Appendix C: Audits and Site Visits

Sponsors, because they are investing money in a sponsored award, are entitled to perform audits of all aspects of the award (financial and programmatic). The following is a list of audit types:

- Pre-award
- Financial statement
- Single audit – Subpart F – 2 CFR 200.501(b)
- OMB A-133
- Program Specific
- Special Review
- F&A Cost Proposal and Disclosure Statement
- Business System Review (accounting, procurement, property, etc.)

These audits may also be accompanied by site visits where the sponsor sends an individual or team to get a first-hand look at award activity to ensure that it is following the sponsor's regulations and the scope of work outlined in the funded proposal.

SHU is obligated to comply with any requests for audits and/or site visits. SHU will provide appropriate personnel and resources to the sponsoring agency to demonstrate compliance.

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

Appendix D: Calculations

The table below shows the percentage per credit and the corresponding time in months.

# Credits	Percentage	# of Months (9 months)	12 months
1	4.17%	0.38	0.50
2	8.33%	0.75	1.00
3	12.50%	1.13	1.50
4	16.67%	1.50	2.00
5	20.83%	1.88	2.50
6	25.00%	2.25	3.00
7	29.17%	2.63	3.50
8	33.33%	3.00	4.00
9	37.50%	3.38	4.50
10	41.67%	3.75	5.00
11	45.83%	4.13	5.50
12	50.00%	4.50	6.00
13	54.17%	4.88	6.50
14	58.33%	5.25	7.00
15	62.50%	5.63	7.50
16	66.67%	6.00	8.00
17	70.83%	6.38	8.50
18	75.00%	6.75	9.00
19	79.17%	7.13	9.50
20	83.33%	7.50	10.00
21	87.50%	7.88	10.50
22	91.67%	8.25	11.00
23	95.83%	8.63	11.50
24	100.00%	9.00	12.00

Appendix E: Statement of Principal Investigator Eligibility

Principal Investigator (PI) refers to an employee of Seton Hall University who is or becomes eligible under this policy to submit a proposal through OGRS for external support for a research, training, or public service project.

A PI personally participates in the project to a significant degree and a PI has primary responsibility for the scientific, technical, and administrative conduct and reporting of the project, and assures the project's adherence to relevant policies and regulations. A PI who is the head of a training or public service project or another non-research sponsored program may be known as a Project Director (PD). For the purposes of this handbook, terms are considered equivalent. The title of Principal Investigator or Project Director identifies the individual responsible for all aspects of the conduct of the project.

Co-Principal Investigator (Co-PI) refers to one or more investigators who share responsibility with the Principal Investigator for the scientific, technical, and administrative conduct and reporting of a project. PIs and Co-PIs are often referred to as senior personnel. Each person thus involved in the project shall be considered to be a Co-PI. Primary responsibility and oversight of the project remain with the Principal Investigator.

The PI or PD on a grant awarded to Seton Hall University must be a permanent full-time employee of the university and belong to one of the following categories:

- ✓ Full-time faculty, staff or administrator.
- ✓ Postdoctoral fellow
- ✓ Any other full-time employees of the University.
- ✓ Professors Emeriti can be PIs based on the availability of departmental resources and on the approval by the appropriate academic dean.

Eligibility to serve as a PI or Co-PI is contingent upon continuation of the employment or other status under which eligibility was initially determined, and upon compliance with all applicable policies of the University and the funding agency. In the event of a conflict between policies of the University and the funding agency, the more restrictive policy shall be followed.