



**Principal
Investigator's
Guide**



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

September 2009

www.du.edu/orsp

University of Denver
Office of Research and Sponsored Programs

Principal Investigator's Guide

September 2009

Table of Contents

ORSP Contacts & Services	5
External Funding Opportunities	9
Grants vs. Gifts	10
Writing a Proposal	11
Proposal Development & Submission	13
Preparing Proposal Materials	13
Electronic Research Administration	14
Budget Preparation	14
Direct Costs	15
Indirect Costs	16
Cost Share / Matching Funds	17
Proposal Review & Approval	18
Signature Authority	19
Research Compliance	20
Conflict of Interest	21
Award Negotiation	22

Award Acceptance	24
Award Management	25
Subcontractors & Consultants	25
Vendor Agreements	26
Sponsor Contact / Modifications	27
Post Award Administration	27
Biweekly Employees	28
Monthly Employees	28
Certifying Effort	29
Purchasing	31
Expenses & Reimbursements	31
DU Purchasing Card	32
Equipment	32
Allowable / Unallowable Costs	33
Cost Share Documentation	34
Program Report	35
Project Closeout	36

What is the Office of Research and Sponsored Programs (ORSP)?

The Office of Research and Sponsored Programs supports the University community in their research and other projects to increase scholarship and creativity, while mitigating risk to the university, faculty, and staff.

ORSP is the key point of contact for faculty in the area of sponsored research, instruction, and other activities, as well as research conduct and compliance. ORSP is sub-department of the Controller's Office and reports directly to the Controller. ORSP reports to the Associate Provost for Research on research related activities.

ORSP provides assistance with locating funding opportunities, preparing budgets, interpretation of regulations and guidelines, compliance with University and sponsoring agency requirements, proposal submission, negotiations, post-award administrative compliance, financial reporting, audits, and project closeouts.

ORSP also provides administrative services for compliance with all research activities related to human and animal subjects, as well as bio-safety concerns, conflicts of interest, export controls and all other research regulatory requirements.

ORSP is located in Mary Reed #222

Associate Provost for Research

Cathryn Potter
(303)871-2913
cpotter@du.edu

ORSP Contacts

ORSP Administration

Gerald Mauck, Assistant Controller – Research
Administration
(303)871-4025
gmauck@du.edu

Sponsored Programs Administration

Julie Cunningham – Manager
(303)871-4039
jcunnin2@du.edu

Lynn Backstrom-Funk, Project Administrator
(303)871-4044
lbackstr@du.edu

Kathryn Buranapiyawong, Project Administrator
(303)871-4040
kburanap@du.edu

Janet Wallace, Senior Grants Fund Analyst
(303)871-4038
Jwallac1@du.edu

Financial Operations and Reporting

Amy Lee, Financial Analyst
(303)871-3751
amy.lee@du.edu

Research Compliance and Training

Sylk Sotto-Santiago – Manager
(303)871-4052
sylk.sotto-santiago@du.edu

Lindsey Neidt - Research Compliance Administrator
(303)871-4050
lindsey.neidt@du.edu

ORSP Services

Program Development

- Provide guidance in interpreting all Federal, State, University, agency and sponsor regulations and requirements.
- Establish education and training programs for faculty and staff related to research and sponsored programs.

Sponsored Program Administration

Pre-Award Services

- Work with agency personnel on specific proposal requirements and guidelines.
- Work with Principal Investigators to prepare budgets to ensure that all potential costs have been identified, that fringe benefit and indirect cost rates are used and calculated correctly, that the budget conforms to the agency's guidelines; assist PI in preparing the budget narrative; and help identify costs that may be included as cost share or match when required.
- Assistance with the cover page, budget, and representations and certifications forms.
- Obtain all signatures required on behalf of the University from appropriate authorized signers.
- Provide internal documents requested by agencies, such as audited financial statements, tax-exempt documents, lists of trustees, and indirect cost rate agreements
- Submit proposals as required by sponsor, including submission on electronic research administration systems.

ORSP does not provide proposal writing services

Post-Award Services

- Assist in review, negotiation and acceptance of awards.
- Prepare and submit all financial reports and billings in accordance with the requirements of the award.
- Insure that the award is in compliance with all federal, state, and internal policies in regards to financial matters.
- Establish and close out accounts in accordance with agreement terms and regulations.

Financial Operations and Reporting

- Insure that all effort is properly accounted for and certified for awards.
- Insure that all award expenditures are reasonable, consistent and allowable.
- Process all award cash receipts.
- Develop, submit and negotiate all indirect cost rates for the University.
- Calculate and distribute indirect cost flowback to departments.
- Conduct the University's space surveys and maintain the property databases.
- Submit all internal and external reports related to University sponsored program activities, including government surveys.
- Serve as the audit liaison for government and independent auditors.

Research Compliance and Education

- Research compliance and education encompasses a wide variety of responsibilities including identifying and managing compliance concerns in any given research project.
- Our research compliance staff can help to clarify university, federal, and specific agency policies, as they relate to human subjects in research (IRB); care and use of animals in research (IACUC); and bio-safety concerns (IBC);
- Identify and manage conflicts of interest;
- Investigate misconduct in research/research noncompliance.
- Review projects for possible export controls
- Establish educational programs in human subjects and animals in research, responsible conduct of research and research ethics

Need Information on:

- **ORSP Policies/Procedures**
- **Project Administrator-Departments**
- **Training Events**
- **News Updates**

Go to:

www.du.edu/orsp

Stay informed! Sign up for ORSP listservs:

Principal Investigators: du-pi@du.edu

Dept Administrators: du-deptadmin@du.edu

Finding External Funding Opportunities

ORSP is committed to helping potential and current Principal Investigators find funding to support their research and programmatic interests. This can be accomplished utilizing several web-based resources.

Community of Science

The University of Denver currently subscribes to the Community of Science (COS) service located at: www.cos.com

COS is the leading global resource for hard-to-find information critical to scientific research and other projects across all disciplines. They aggregate valuable information so you spend less precious time and money searching for information you need, leaving more time and money for your projects.

- Find funding with **COS Funding Opportunities**: search the world's most comprehensive funding resource, with more than 23,000 records representing nearly 400,000 opportunities, worth over \$33 billion.
- Identify experts and collaborators with **COS Expertise**: search among 500,000 profiles of researchers from 1,600 institutions throughout the world. Discover who's doing what—current research activity, funding received, publications, patents, new positions and more
- Promote your research with a **COS Profile**: showcase your research and expertise among researchers and scholars from universities, corporations and nonprofits in more than 170 countries. Use convenient tools to keep your CV updated and accessible.

Grants.gov

The federal government has developed a one-stop web resource to find federal grant and cooperative agreement funding opportunities and apply for funding electronically.

This federal resource is located at: www.grants.gov

Grants vs. Gifts

There are two departments within the University of Denver which can assist you in obtaining funding - ORSP and University Advancement. Any official proposal for external funding must be submitted through one of these offices.

The following guidelines will help you determine which office is the most appropriate office to contact when getting ready to submit your proposal.

Office of Research and Sponsored Programs (ORSP)

- A grant/contract for specific work or deliverables, including research. Exchange of reciprocal value between the University and Sponsor.
- Sponsor may be government entity, foundation or corporation.
- Proposals are often reviewed by peers, academic discipline or research interest area.
- Reports and financial statements to the sponsor require detailed reporting and/or accounting
- Audits are required by sponsor or government regulation, e.g. A-133 audits.
- Proposal must include assurances of compliance regarding use of human subjects, animals, biohazards, and other laws and regulations.
- Funds not spent must be refunded to the sponsor.

University Advancement

- A contribution, with charitable intent and no expectation of exchange or reciprocal value.
- Donor may be private individual, charitable

- foundation or corporation.
- Applications may be reviewed by a board of “lay” persons or the donors themselves.
 - Reports and financial statements to the donor are of a general nature and are basically for stewardship purposes.
 - May be subject to general donor audits.
 - There is no use of human subjects or animals in research, hazardous materials, etc.
 - If the project or program is not implemented, the contribution may be returned or may be transferred to another project or program at the donor’s discretion.

University Advancement Contact

Leigh Elliot – Director- Dev/Foundation Relations
(303)871-7469 leigh.elliott@du.edu

DU Funding Assistance

Please contact **Cathryn Potter – Associate Provost for Research** for information on DU internal development opportunities and assistance.

Writing a Proposal

Below are links to web pages that focus on helping you be a successful grant writer.

Basic Grant Writing Instructions

Proposal Writing Guide:
<http://www.washington.edu/research/guide/grantwriting.html>

Developing and Writing Grant Proposals:
<http://aspe.hhs.gov/cfda/ia6.htm>

Instructions and Sample Proposals

Guide for Writing a Funding Proposal:
<http://learnerassociates.net/proposal/>

Non-profit Guides: Grant writing tools for non-profit organizations:

http://www.npguides.org/guide/sample_proposals.htm

Environmental Protection Agency: Grant-Writing Tips:

<http://www.epa.gov/ogd/recipient/tips.htm>

Sample funded proposals from the Department of Education:

<http://www.ed.gov/about/inits/list/fbc/grants2.html>

Index to Sample Proposals:

http://www.k12grants.org/samples/samples_index.htm

NIH Grant Writing Information

NIH Grant Writing Tips Sheet:

http://grants.nih.gov/grants/grant_tips.htm

NIH Grant Cycle: Application to Renewal:

<http://www.niaid.nih.gov/ncn/grants/cycle/default.htm>

A sample successful R01 proposal submitted to NIH by Dr. Mark Smeltzer:

<http://www.niaid.nih.gov/ncn/grants/app/default.htm>

NSF Grant Writing Information

A Guide for Proposal Writing:

<http://www.nsf.gov/pubs/2004/nsf04016/start.htm>

ToolKits

Grantseeker Toolkit:

<http://healthlinks.washington.edu/rfs/index.html>

Researchers Toolkit:

<http://healthlinks.washington.edu/toolkits/>

Proposal Development and Submission

Guidelines

The initial starting point for any proposal submission is the application guidelines. Whether you are responding to a Program Announcement (PA), Request for Proposals (RFP), Request for Applications (RFA), Broad Agency Announcement (BAA), or unsolicited, it is very important that you follow all application preparation and proposal submission guidelines provided by the sponsor.

Once a Principal Investigator determines that he/she will be submitting a proposal, they should immediately provide notice of their intention to submit and information regarding the program to their ORSP Project Administrator. The ORSP Project Administrator will obtain written application guidelines and provide assistance with interpretation.

Preparing Proposal Materials (Forms)

ORSP Project Administrators are available to help prepare application forms and provide information, and guidance for application form completion. **ORSP does not provide proposal writing services.**

Most sponsors require a cover sheet with some or all of the following information:

Legal Name: Colorado Seminary, a not for profit Colorado corporation which owns and operates the University of Denver

Mailing Address: 2199 S. University Blvd.
Denver, CO 80208

Federal EIN #: 1-84-0404231 A1

DUNS #: 007431760

Human Subjects

Assurance #: FWA00004520

Animal

Assurance #: A-3193-01

Electronic Research Administration

There are many sponsors that accept only on-line applications and this will continue to be the trend, as more federal agencies develop on-line submission procedures. It is important that the Principal Investigator contacts his/her Project Administrator as early as possible to determine if the University of Denver is signed up as an organization on the sponsor's submittal website.

The most commonly used electronic submittal sites are:

Grants.gov:

www.grants.gov

NSF Fastlane:

<https://www.fastlane.nsf.gov/jsp/homepage/proposals.jsp>

NASA—NSPIRES:

<https://nspires.nasaprs.com/external/index.do>

Budget Preparation

The budget is one of the most important parts of an application. The typical budget has two forms of costs — Direct and Indirect.

Direct Costs

These are costs that can be directly associated and charged to one specific project. The following costs are typically considered direct costs:

- *Salary* - Any DU employee working on a project that will be charged to the grant must be included in the salary line component. Most sponsors require that a percentage of effort or FTE is identified.
- *Leave Reserve* - The Principal Investigator must calculate leave reserve on any non-faculty DU employee who receives vacation, sick or holiday benefits and that will be charged to a grant. Leave reserve is not listed as a separate line item, but is included in the salary amount. This is done by taking the salary amount and increasing it by 15%.
- *Fringe Benefits* - The University of Denver has three negotiated fringe benefit rates for individuals being charged to a grant depending on type of employee. The rates for FY10 are:
 - Faculty = 24.3%
 - Non-benefited = 7.7%
 - Students = 1.5%Fringe benefits are figured on the salary amount plus any leave reserve for each individual working on a grant.
- *Supplies* - These are costs that are attributed to the project for items such as program materials, lab supplies, etc. Routine office supplies such as postage, paper, pens, etc. cannot be charged to a grant unless they can be directly associated with one project and kept separate.
- *Travel* - Costs associated with traveling either domestic or international.

Per Diem rates can be figured by using the GSA website:

<http://www.gsa.gov/Portal/gsa/ep/home.do?tabId=0>

Effective 12/08 mileage rate is 55.0 cents/mile

- *Consultants* are individuals who are not DU employees and who will contribute a specialized skill set to a project. Consultant costs are typically for salary only and may be based on a daily or monthly rate determined by the consultant. Travel costs may be included in consultant agreements if travel is necessary to perform the activities outlined in the statement of work
- *Subcontracts* are formal agreements with organizations to conduct a substantive portion of the work for the project. If the PI is planning to subcontract out a portion of the work, it must be listed in the proposal. Most organizations will provide a letter of intent to form a collaboration and a detailed budget for their portion of the costs that will be submitted with the proposal. These organizations may charge the University of Denver indirect costs as well.
- *Equipment* - Defined by OMB as one item with a cost over \$5,000 and a lifetime greater than 2 years. Equipment costs can be determined by receiving written estimates from vendors.
- *Tuition* - The University of Denver policy is for the academic division to support ½ of the tuition for any GRA working on the project and then charging the other 1/2 of tuition to the sponsor. Tuition is determined by taking the tuition rate times 3 quarters and then by the standard academic load for that division.

Fiscal year rate:

www.du.edu/registrar/regbill/reg_tuitionrates.html#

Indirect Costs (IDC)

IDC (Facilities & Administration costs) cannot be directly charged to a specific project so they must be pooled together and categorized as overhead for the University of Denver. The current fiscal year Indirect Cost Rates are located at: www.du.edu/orsp/rates.html

To determine IDC rates on a proposal, you must first know the type of basis the sponsor utilizes. The two most common indirect cost bases are:

- Total Direct Costs (TDC) - All direct costs are added together and then multiplied by the appropriate IDC rate.
- Modified Total Direct Costs (MTDC) - This basis is modified by excluding some direct costs from being charged IDC. To determine this basis, add together all direct costs (EXCEPT equipment, tuition, and subcontract costs over \$25,000) and then multiply by the appropriate IDC rate.

Cost Share / Matching Funds

Cost share is defined as the project or program costs not borne by the sponsoring agency. In order to include an item as a cost sharing it must be:

- Verifiable
- Not included as a cost share to another grant or contract account without agency approval
- Necessary and reasonable for project
- Allowable and allocable under applicable cost principles
- Not funded from another grant or contract without agency approval
- Incurred within the time frame of the project

Additional Guidelines for Cost-sharing

- Unrecovered indirect costs (waived IDC) can be used as cost sharing only with agency written approval.
- Tuition and waived IDC are the preferred methods of cost sharing because they are easily verifiable.
- Cost sharing should be limited in proposal preparation to only those costs making a direct contribution to the project. Excessive cost

sharing cause additional work on everyone's part. **Voluntary cost sharing is strongly discouraged.**

- Cost sharing identified in the text of the proposal must be listed in the budget.
- All sources of university cost share should be easily identifiable in the budget. For example, differentiate between costs contributed by the department versus those contributed by the school or another unit.
- A letter of support, with specific reference to the cost sharing, from a third party source, must be included with the proposal. Written confirmation of third party support will be required at the time the final cost sharing report is prepared for the agency.
- The university is required by federal guidelines to account for all cost share associated with federal or federal pass through accounts. This is true regardless of the granting agency involved and whether the cost share is considered mandatory or voluntary.

Proposal Review and Approval (PRA)

The University of Denver requires all proposals be reviewed at the department, dean and ORSP level to assure compliance with federal and university policies. The Proposal Review and Approval (PRA) form is an internal form that documents budgetary and compliance issues. The Principal Investigator is responsible for completing the form and obtaining departmental signatures before submitting to ORSP with the final proposal document.

An electronic .pdf version has been developed so that proposals and the PRA form <http://www.du.edu/orsp/forms.html#pra> can be routed electronically and digitally signed.

Completed PRA forms are required PRIOR to submission of proposal.

Signature Authority

There are a limited number of individuals who can commit the University to receive external funding by signing proposals. The signature authority is based on a monetary limit. The following contact information may be requested by the sponsor on the proposal documents.

Proposals up to \$500,000

Gerald Mauck, Assistant Controller
W: 303.871.4025 F: 303.871.2623
Email: gmauck@du.edu

Cathryn Potter, Associate Provost
W: 303.871.2913 F: 303.871.2623
Email: cpotter@du.edu

Proposals up to \$1.5 million

Margaret Henry, Controller
W: 303.871.3740 F: 303.871.3635
Email: mhenry@du.edu

Proposals above \$1.5 million

Craig Woody, Vice Chancellor for
Business and Financial Affairs
W: 303.871.3588 F: 303.871.4002
Email: cwoody@du.edu

Robert Coombe, Chancellor
W: 303.871.2111 F: 303.871.4101
Email: chancellor@du.edu

Submission

All proposals must be submitted through the Office of Research and Sponsored Programs (ORSP). Project Administrators are responsible for submitting proposals both electronically or via FEDEX.

Research Compliance

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

All projects involving human subjects conducted by faculty, staff and students of the University of Denver require IRB review and approval. An IRB application must be completed and submitted electronically via eProtocol, along with additional attachments, before research begins and by the submission deadline. See www.du.edu/orsp/research_compliance.html for monthly deadlines. Additionally, you may need to include one or more attachments if the project involves protected health information, anonymous or confidential consent forms and/or international research.

Please see the IRB Application and Checklist, found on the website, for links to these attachments.

NOTE: Some research studies are exempt from the Code of Federal Regulations. In these cases, an abbreviated “Exemption Application” may be completed and submitted to ORSP for review by the IRB chair. However, the IRB, not the PI, must determine that research is exempt. For information: www.du.edu/orsp/irb.html or send an email to du-irb@du.edu.

Institutional Animal Care and Use Committee (IACUC)

Any individual proposing to use animals in research is required to obtain approval from the University of Denver IACUC. “Animal” is defined as “any live, vertebrate animal used or intended for use in research, research training, teaching, experimentation or biological testing or for related purposes.” Please visit www.du.edu/orsp/research_compliance.html for access to electronic submissions via eProtocol. For information and forms: www.du.edu/orsp/animal.html or send an email to du-iacuc@du.edu

Institutional Biosafety Committee (IBC)

The IBC is responsible for ensuring that research involving recombinant DNA or select agents and other biological hazards at the University of Denver is in compliance with established NIH Guidelines. To carry out this oversight, the IBC has three main tasks: Review research proposals involving biological hazards, Develop emergency plans for accidental biohazard spills, and provide consultation to PI's on biosafety issues.

Please visit

www.du.edu/orsp/research_compliance.html for access to electronic submissions via eProtocol.

For information and forms:

www.du.edu/orsp/biosafety.html or send an email to du-ibc@du.edu

ORSP Research Committee Dates

See www.du.edu/orsp/meetingdates.html for Committee meeting dates/deadlines.

Conflict of Interest

Beginning October 1, 1995, federal regulations require that the University manage, reduce, or eliminate actual or potential conflicts of interest with financial interests of a principal investigator (PI), project director, or others. Accordingly, the University must require that the investigators/project directors disclose any significant financial interest that creates an actual or potential conflict of interest in relation to a sponsored project. These federal regulations also require that such disclosure occur prior to the submission of a sponsored project proposal, or, if a significant financial interest develops subsequent to proposal submission or issuance of award, as such significant financial interests arise. In order to comply with these federal requirements, the University requires Certification of Compliance: www.du.edu/orsp/conflict.html

The University's Conflict of Interest (3.20.060) and Faculty Professional Service Activities and Conflict of Interest (3.01.005) Policies apply to all University personnel under all circumstances.

Please see the website for additional information regarding the following:

<http://www.du.edu/orsp/>

Certification and Training
COI - Conflicts of Interest
Contact Information
Data Security
Definitions
Education
FAQ's
HIPAA (Privacy Act)
Informed Consent
Mission Statement
Policies and Procedures
Research Compliance Newsletter
Research Misconduct Policies

Award Negotiation

Pre-Award Costs

- Some sponsors authorize spending up to 90 days prior to an award to the University being finalized.
- The Principal Investigator (P.I.) must request pre-award costs by filling out the University Prior Approval Request Form
- ORSP Project Administrators will contact the sponsor and get University approval before setting up a fund with a 90 day allocation of award costs.

Contract / Grant Negotiation

When a sponsoring entity has decided to provide support for a proposed effort, several types of award documents may be used between sponsors and recipients. Depending on the mission of the sponsor and the type of effort to be accomplished, the sponsor may determine any of the following types of awards to be appropriate.

- Contract (Fixed-Price, Cost-Reimbursement, etc.)
- Grant
- Cooperative Agreement
- Purchase Order
- Letter Contract
- Check (Advance Payment)

NOTE: All Contracts must be reviewed by your Business Office prior to being submitted to the Office of Research and Sponsored Programs. ORSP must then submit to University Counsel Office, and Risk Management before signature. ***Counsel review takes a minimum of 10 days, so plan ahead!*** Please see “Contract Review Process on ORSP webpage and Counsel webpage at:

<http://www.du.edu/counsel/contract-review-process.htm>

In all, some level of negotiation may be required prior to acceptance to determine the

1. activity being supported or procured,
2. period of performance,
3. amount of money or value to be provided, and
4. terms and conditions that will govern the sponsored effort.

Most routine negotiations are handled quickly and require little strategy or planning, but the Principal Investigator is always a team member during all stages of the negotiation process.

The Office of Research and Sponsored Programs is the responsible agent within the University for negotiation with external sponsors. Sponsored project awards are generally awarded to the institution, not the individual responsible for the technical aspects of the project.

The University goal for a good sponsored agreement promotes negotiation of an award that:

- Supports a successful project
- Minimizes risk

Award Acceptance

ORSP considers an award to be officially received when written notification is received from the sponsor. In the case of contracts or subcontracts, an award is not official until the contract has been fully signed/executed by both parties to the agreement. In some cases, a grant award must be accepted by signing and returning the grant award notification. This signature must be completed by one of the authorized signatories.

In most cases, ORSP receives the grant award notification from the sponsor. However, in some instances the grant award notification is sent directly to the PI. The PI must provide this grant award notification to ORSP for review, acceptance and setup of grant and fund.

1. A new grant number is assigned and entered into BANNER.
2. A new fund is set up with the budget allocated according to the sponsor's awarded budget or proposed budget if no changes were made by the sponsor.
3. The proposal is incorporated into the official grant document file.
4. The following documentation is distributed to the PI and Departmental Administrator:
 - A copy of the original award letter
 - Budget breakdown

Award Management

Subcontractors and Consultants

If a substantive portion of the project is being performed by an organization (subcontractor) or individual (consultant), a sub-award may be issued to that organization or individual. First check with ORSP for what is allowable, if initially not budgeted or requested.

A Request for Subaward Agreement needs to be completed for each subcontractor or consultant. The agreement should be requested and issued by ORSP prior to the subcontractor/consultant beginning work on your project. If the proposed consultant is a DU employee, the individual must be paid through payroll, rather than through a consulting agreement.

Request for Subaward Agreement:

1. Answer all questions on form and include a detailed statement of work.
2. Attach subcontractor proposal to form, including budget.
3. PI signature is required where indicated at the bottom of form.
4. Forward the completed form to the ORSP Project Administrator.

Sub-Agreement Process:

- Once the Request for Sub-Agreement is received by the ORSP Project Administrator, the formal sub-agreement is prepared and ORSP obtains authorized signature on behalf of the University of Denver.
- Two copies of the completed sub-agreement are forwarded to the subcontractor/consultant.

- Subcontractor/Consultant returns one copy of the signed agreement to ORSP and keeps one copy for their records. The fully signed copy is kept in the ORSP sub-agreement file.
- When invoices are submitted, the subcontractor/consultant name on the invoice must match the subcontractor/consultant name listed on the Request for Subaward Agreement.
- The invoice must also include the agreement number and the DU purchase order number.
- The PI must sign the invoice. This signature indicates that work is progressing satisfactorily and payment is authorized. The invoice is forwarded to ORSP for approval. Upon ORSP approval, DU Accounts Payable will process the payment.

Vendor Agreements

A vendor agreement can be utilized if the service or product is considered “work for hire” and is NOT substantive to the overall project.

Vendor agreements are handled by the department as either a Purchase Order for any amount over \$900 or a direct pay if it is less than \$900. The department will be responsible for setting up the purchase orders and processing invoices for these types of agreements.

Interpret Terms & Conditions

ORSP is responsible to ensure that all grant funds are administered according to sponsor terms and conditions. Most sponsors provide these terms and conditions with the award letter so it is important to read the grant award notification letter thoroughly. If the PI has questions about these terms and conditions or questions that are not addressed by the terms and conditions, his/her Project Administrator will contact the sponsor directly for clarification.

Sponsor Contact / Modifications

There are several major changes that must be requested and approved by the sponsor.

1. Change in the Scope of Work - Sponsors award funding to complete a specific project according to the scope of work that the PI has proposed. If there is any significant change to the scope of work (e.g., cannot complete the proposed project, results indicate a different direction of focus is needed, etc.), the sponsor must approve such change by formal notice. The PI should contact his/her Project Administrator for assistance with this process.
2. Change of PI - The PI must contact ORSP and the Project Administrators will contact the sponsor for approval.
3. Budget Revision - The PI must complete a revised budget on a sponsor budget form and provide this budget to their Project Administrator. The Project Administrator will look over the budget for accuracy and compliance with University policies before submitting the budget to the sponsor.
4. Extending the Period of Performance - The PI must request a no-cost extension before the end of the project period with an explanation of why funding has not been fully utilized. No-cost extensions cannot be granted solely because there is funding left to be spent out of the grant. Some sponsors allow ORSP to grant a 12 month no-cost extension to the PI, however most sponsors require that the request be sent to them before it is officially approved.

Post-Award Administration

ORSP is responsible for invoicing sponsors and receiving payments on grants and contracts administered through ORSP. The type of invoicing is determined by the terms of the contract and possibly:

- Cost reimbursable grants/contracts are usually invoiced monthly based on actual expenditures.
- Fixed Price Contracts are invoiced on a predetermined schedule but are not based on actual expenditures.

Payroll

All Employee paperwork is to be submitted to HR and Payroll directly according to policy the same as for all DU employees.

Biweekly Employees

When hiring a biweekly employee, an MBTH Form is completed by the department, routed for approvals, and submitted to Payroll.

A timesheet is completed for each 2-week pay period, showing the labor distribution, signed by the employer and supervisor, and submitted to the Department Timekeeper for entry into Banner for payment. The completed, signed timesheet is forwarded to Payroll for approval by 9:00 am on the payroll due date. (If the timesheet is incomplete, unsigned or not received by Payroll, the timesheet will be disapproved in Banner and sent to the department timekeeper.) The current timesheet form can be downloaded from the ORSP website: www.du.edu/orsp/forms.html

No effort certification is required for biweekly employees.

Monthly Employees

When hiring a monthly benefited employee who will work on sponsored projects, a PCR Form is completed with the estimated labor distribution. The portion of time expected to be spent on sponsored projects is coded to the ORSP Payroll Clearing Fund (12023).

If work on sponsored project(s) is consistent for 2 or more months, a BECR Form should be submitted to

Payroll distribute salary among the different department and sponsored project activities. When salary distribution is set up via a BECR, monthly timesheets are not required.

When work on sponsored projects is inconsistent, a timesheet with the salary distribution must be submitted to Payroll each month by the due dates as posted by Payroll. The current timesheet forms can be downloaded from the ORSP website: www.du.edu/orsp/forms.html

When hiring a monthly, non-benefited employee, an MBTH form is completed with the estimated labor distribution.

For any monthly employee paid from a grant whose distribution cannot be determined at hire or changes month to month, need a timesheet if set up in 12023 or paid by a grant. A timesheet must be submitted monthly.

Certifying Effort (Monthly Employees Only)

The Office of Management and Budget (OMB) requires that each grant recipient document time expended towards a sponsored program.

OMB requires documentation and certification of percent of effort, totaling 100%, in support of one's total commitment to the university. In order to meet this requirement for documentation and certification, each individual paid on a monthly basis and who has some commitment towards a sponsored program, shall certify their effort based on the distribution of total compensation paid to the individual during that month.

Procedures

1. A report will be generated based on payroll distributions for each employee who is:

- Paid monthly, AND
 - Has been paid from a sponsored program fund, OR
 - Has cost-shared effort towards a sponsored program (as indicated through an Activity Code), OR
 - Has an employee class code related to research.
2. ORSP shall distribute these reports to the employees. Faculty will receive these reports semi-annually; Non-faculty will receive them monthly.
 3. Employees shall review, indicate adjustments, and certify by signing.
 4. The supervisor (PI) shall sign. If the employee is the PI, the Department Chair or Dean shall sign.
 5. Reports shall be returned to ORSP promptly.
 6. ORSP shall make any adjustments indicated through the Banner payroll system.

Adjustments and Corrections

Workload Adjustment (Reduction or Addition to Salary)
 - Fill out the form Workload Adjustment Request Form and submit to Payroll for approval by the payroll due date.

To request a payroll correction, please fill out the Request for a Payroll Redistribution Form. Turn in the completed form to Payroll by the due date for the correction to show in the financial close of that month.

To request a hand check, fill out the Hand Check Request Form with the same name. Hand checks are for emergency use only. Hand check requests are submitted directly to Payroll where they are handled like all DU hand check requests.

Terminations

For GRAs submit the MBTH Form.

For non-benefited employees, submit the MBTH Form. For appointed employment, see Human Resources website for Separation Request Form.

Purchasing

Please see website for complete information on the following: www.du.edu/purchasing.

Expenses & Reimbursements

The Direct Pay Request is used by all departments to process payment for expenditures that are not required to be processed on a standard purchase order or field order. The types of expenditures to be processed on a standard direct pay request are:

- Travel and Conference (registration fees, transportation, lodging, meals, etc.)
- Reimbursement of petty cash funds
- Membership Dues (allowable in civic, business, technical and professional organizations)
- Subscriptions
- Advertising (generally not an allowable cost on a research fund)
- Honorarium Payments / Speaker Fees
- Entertainment (generally not an allowable cost on a research fund)
- Program materials under \$300 (must be part of the research fund approved contract)
- Business Meals (The IRS considers business meals as entertainment. All receipts for a business meal must include who was present, purpose of meal, date of meal and why the meeting could not have taken place at a non-meal time)
- Donations and Contributions (generally not an allowable cost on a research fund)

Adequate documentation for the expense such as invoices, original receipts or registration forms should be attached to the voucher.

The ORSP accounting staff will review all direct pay requests to insure that the expense is allowable and in compliance with the terms and conditions of the grant/contract. If approved, requests are forwarded to accounts payable for payment.

DU Purchasing Card

This may be used for purchases up to \$2,000. See www.du.edu/ for purchasing for restrictions and more information.

Equipment

Commitments to match funds from external sponsors for the purpose of purchasing equipment may be made by the Department Chair, the Dean, the Associate Provost for Research, or a university employee who has fiscal responsibility for university non-restricted funds. Such commitments are considered cost-sharing. Authorization from these individuals is required prior to proposing any commitments, and these individuals will need to consider such commitments in their budget planning processes.

Equipment Procedures

- When a proposal is prepared, the PI shall work with ORSP to identify cost-shared expenses.
- If a match for equipment is required, the PI shall obtain commitments from the Department Chair, Dean and/or Vice Provost for Research. Commitments shall be indicated.
- On the ORSP Proposal Review & Approval (PRA) Form by noting the amount, fund/or, expected fiscal year of expense and signature.
- Upon award of grant, ORSP shall communicate to the PI and Department Administrator the amount that is reserved for match and the fiscal year. The PI/Department Administrator shall confirm expected purchase(s) by indicating the DU purchase order number(s) and returning to ORSP.

- The equipment shall be purchased from grant funds and departmental funds, for the costshared portion (which will need to be transferred to the appropriate FOAPs.)
- The department shall submit invoice(s) and copy of financial transactions that have been paid to ORSP for reimbursement to their department fund/org.
- ORSP makes expense transfers to the appropriate FOAP, including cost-share Activity Code.

Allowable / Unallowable Costs

All grant/contract expenditures must be based on the cost principles outlined in the Office of Management Budget Circular A-21 guidelines. Allowable costs can be charged to the grant fund, however, unallowable costs must be charged to the department. Following is a list of unallowable costs listed in OMB Circular A-21:

1. Advertising and Public Relations Costs
2. Alcohol
3. Alumni Activities
4. Bad Debt
5. Commencement and Convocation Costs
6. Contingency Provisions
7. Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringement
8. Donations and Contributions
9. Entertainment Costs
10. Fines and Penalties
11. Fund Raising and Investment Costs
12. Goods or Services for Personal Use
13. Housing and Personal Living Expenses
14. Idle Facilities and Idle Capacity
15. Interest
16. Lobbying
17. Losses on Other Sponsored Agreements or Contracts
18. Pre-agreement Costs unless allowed by Sponsor

- 19. Selling and Marketing
- 20. Student Activity Costs

Cost Share Documentation

Award Stage

- Office of Research and Sponsored Programs sets up grant/fund and activates a Cost-Share Activity Code.
- The Cost-Share Activity Code is used with a 10000 fund and departmental operating org.
- This Cost-Share Activity Code will be needed on all transactions for salaries, supplies, travel and equipment. It will not be necessary to use the CS activity code on tuition, waived IDC or third party contributions.
- Verification of Cost-Share forms will be sent to the PIs quarterly and must be signed and returned to ORSP.

Salaries

- Employees submit timesheets using departmental FOAP and Cost-Share activity code.
 - Salaried/monthly employees submit salmon timesheets each month
 - Benefited/bi-weekly employees submit blue timesheets weekly

Supplies

- Items are purchased with direct pay vouchers or purchase orders
- Cost share activity code must be used on direct pay forms or purchase orders to tag supplies as cost share.

Third Party

- Signed statements from third party entities certifying cost match amounts.

Closeout

- All cost-share must be accounted for and verified before the end of the project period. Cost-share will be reported on the final financial report sent to the sponsor.

Program Report

Most sponsors require some form of program reporting to ensure that the University of Denver completed the scope of the work of the project and utilized the money as stated in the approved budget.

- Financial Reporting - The Financial Representative for your project will complete any necessary financial reports to the sponsor including interim and final financial reports.
- Technical Reporting - The PI may be required to provide interim narrative and/or a final narrative report that explains the progress and outcomes of the sponsors project.
- Inventions/Patent Reporting - The PI is responsible to report any inventions or patentable products conceived during a project to the sponsor.
- Property Reporting - The PI is responsible to report any equipment that is obtained using grant dollars. Property must be reported to Dan Delatorre, Property Manager (Controller's Office) for the University of Denver. Sponsors have differing policies about ownership of property accumulated with federal dollars so contact your Project Administrator for policy clarification.

Project Administrators will send reminders regarding upcoming reports and will submit these reports to the sponsor.

Project Closeout

All grants have a defined begin and end date. Once the grant has reached the end date, the Office of Research and Sponsored Programs begins the grant closeout process.

1. Program Administrators send a Project Expiration Notice to the PI 60 days before a project is scheduled to end.
2. PI's return the Project Expiration Notice marked with the appropriate response.
3. If the PI states the grant is ending as scheduled, the Program Administrator will send a Close-out Checklist form that the PI will need to fill out and send back to the PA.
4. Once the Program Administrator receives the Close-out Checklist, the PA completes a Project Closeout Form and begins to route it through compliance and accounting personnel.
5. The Account Representative will finalize the close-out process. Unused funds will either be returned to the sponsor or moved to the departmental flow back account based on the terms of the grant/contract.
6. All records at the departmental level and ORSP must be retained for three years following the final close-out of the award.
7. The University of Denver is required by the Office of Management and Budget to comply with all audits and audit findings. The Office of Research and Sponsored Programs coordinates all audits and strives to handle all audit questions within their office, however, occasionally the auditor may contact the department for clarification.

ORSP Policies: <http://www.du.edu/orsp/policies.html>

ORSP Forms: <http://www.du.edu/orsp/forms.html>