

Grants Management Workshop

A Joint Presentation by Savannah State University

Office of Sponsored Research Administration and Grants & Contracts Accounting

OCTOBER 17, 2017

Introductions

OSRA –

Chellu Chetty, PhD, Associate Vice President, Research & Sponsored Programs
Nancy Riggs, Director, OSRA
Harsha Kenche, Administrative Systems Manager

Grants & Contracts Accounting –

Katarah Harris – Manager
Lisa Senters – Senior Grants Accountant

Purpose of Today's Training/Workshop Objectives

Provide training to:

Ensure **compliance** with federal grants regulations (2 CFR 200 and other regulations) and institutional policies:

- ❖ Pre-Award/Proposal Development
- ❖ Post Award Grants Management
- ❖ Research Compliance – Human Subjects, Responsible Conduct of Research, Animal Care, financial conflicts of interest, etc.

Ensure that SSU meets all audit requirements of the federal agencies, the USG, and the State of Georgia

Ensure that SSU effectively invests the taxpayer's dollars

Ensure that faculty/staff know the Offices and know about office resources/services

Q&A – provide forum for questions

2 CFR 200 – UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

- Consolidates federal regulations <https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-part200/content-detail.html>
- Cost Principles (Reasonable, allowable, allocable, direct vs. indirect, etc.)
- Administrative Requirements (financial management, performance management, records retention, etc.)
- Audit Requirements
- ***It is the responsibility of the Principal Investigator (PI) to ensure compliance with these regulations.***

Proposal Development/Pre-Award Policies: Institutional Approvals

- All awards are made to the University, not to the PI. The University is committing resources (time/labs, etc.)
- Therefore, **before submission**, the PI must get the institution's approval for the proposal.
- Approvals must be obtained **before submission** from each chair, dean, and from OSRA. DO NOT SUBMIT WITHOUT GOING THROUGH OSRA AND THE CHAIR/DEAN. The result may be that University resources are committed without full compensation/recovery of costs.
- There are now 3 forms required before the PI submits:
 - **Intent Form** – early heads up to your management that you intend to submit, useful if there is a limit on # applications
 - **Approval Form** – final approval from management for you to submit, based on your final proposal (attach narrative/scope of work and budget)
 - This provides approval for release time and other resources/commitments by SSU (cost share, animal use, etc.)
 - **Financial conflict of interest form** – NEW FORM - must be submitted with approval form
- The internal approval process is the same for subawards. Any questions (LOI, pre-proposals), call OSRA.

Timeline for Proposal Development & Submission

- Start early, a minimum of 6 months may be needed for quality proposal in order to:
 - **Consult with program officer – make contact early & often**
 - Engage your team; decide roles, conduct literature review, write narrative, gather biosketches
 - Consult with OSRA – make sure budget complies with 2 CFR 200
 - Engage external partners; SSU will need to negotiate subawards with their PI & Sponsored Research Office **BEFORE** submission
 - Get internal approvals & complete FCOI form
- Final draft should be routed to chair(s)/dean(s) and to OSRA at least **1 week before the due date**
- Allow time (1-2 weeks before the deadline) to begin entry of proposal documents (narrative, budget, biosketches) into the electronic submission portal (grants.gov, NSF Fastlane, etc.)
- **Proposals are submitted by OSRA as Authorized Organizational Representative (AOR)** through grants.gov, NSF Fastlane, etc. (with some exceptions for email applications – but copy OSRA)

Responsibilities of PI

(principal investigator/director)

➤ Responsible for all aspects of program (pre and post award)

➤ Pre-Award:

- Develop and submit proposal (working with faculty/staff team as required)
- Develop proposal budget that is reasonable and accurately reflects the proposed scope of work in the narrative/program design
- Ensure that all institutional approvals are secured for proposal before submission (chair, dean, supervisor, OSRA)

➤ Post-Award

- Work with HR to hire staff personnel as required (program manager, etc.)
- Manage the program work, including supervision of faculty and staff team members, students, and external consultants
- Ensure that all team members including students complete required compliance obligations (RCR training, FCOI disclosures etc.)
- Manage the grant budget – ensure that all expenditures are per the proposed scope of work and are reasonable
- Ensure that all team members submit time & effort reports
- Maintain program records/database to support: a) thorough internal assessment of progress (outputs/outcomes) made towards program objectives, b) performance reporting to funding agency, c) reporting to program evaluator/advisory boards, d) fulfill retention requirements of 2 CFR 200 (min of 3 years after closeout)
- Conduct regular team meetings to coordinate activities; conduct advisory board meetings as required
- Hire and oversee work of external consultants, including hiring external evaluator (using SSU consulting agreement form)
- Make annual programmatic reports to funding agency – continuation funding from year to year may require satisfactory achievement by year
- Disseminate project results via conference presentations, publications in journals
- Implement sustainability plan to ensure the grant “seed money” investment results in long-term continued impacts and activities

Preparing Application

Read the instructions (#1 mistake is failure to follow instructions)

Open electronic package/portal ASAP – start filling out forms & prepare attachments:

- ✓ Abstract
- ✓ Narrative
- ✓ Budget Template (\$\$)
- ✓ Budget justification
- ✓ Biosketches
- ✓ Letters of support

OSRA website has needed SSU data: Tax ID #, Duns #, etc.

Federal Guidelines for Budget

- Budget guidelines are **per 2 CFR 200 & institutional policy**
 - Costs must be reasonable, allocable, allowable
 - **Grant salaries** are per institutional base salary (IBS)
 - Compensation (**AY release time vs. summer**) must accurately reflect when effort is incurred (time & effort issue)
 - 12 month faculty/staff cannot be paid salary from grant funds
- **Fringe benefits** estimates to be used for grant budgeting have been established by Fiscal Affairs (OSRA website)
- Travel costs must be reasonable and per state, and federal agency guidelines
- **Indirect costs (needed to support SSU's research enterprise and to cover the University's costs)** are based on SSU's HHS approved rate (40.93% of modified total direct costs) unless not allowed by funding agency or waived by OSRA
- OSRA must review grant budget before submission & can assist with budget development – please contact us.

Sample Grant Budget

Sample Grant Budget							
Personnel	IBS			year 1	Year 2	year 3	all years
PI	\$60,000	1 month summer		\$6,667	\$6,867	\$7,073	\$20,606
PI (Adjunct replacement)		Release time		\$3,000	\$3,000	\$3,000	\$9,000
Co-PI	\$45,000	1 summer month		\$5,000	\$5,150	\$5,305	\$15,455
Program Manager	\$30,000	100% effort		<u>\$30,000</u>	<u>\$30,000</u>	<u>\$30,000</u>	<u>\$90,000</u>
Total				\$44,667	\$45,017	\$45,377	\$135,061
Fringe Benefits							
PI - summer		0.1793		\$1,195	\$1,231	\$1,268	\$3,695
PI (adjunct replacement)		0.0145		\$44	\$44	\$44	\$131
Co-PI		0.1793		\$897	\$923	\$951	\$2,771
Prog. Mgr.		0.31		<u>\$9,300</u>	<u>\$9,300</u>	<u>\$9,300</u>	<u>\$27,900</u>
Total				\$11,435	\$11,498	\$11,563	\$34,496
Travel				\$3,000	\$3,000	\$3,000	\$9,000
Student Support							
Stipends	2	\$3,000		\$6,000	\$6,000	\$6,000	\$18,000
Supplies				\$2,500	\$1,000	\$1,000	\$4,500
Consultants				\$2,500	\$2,500	\$2,500	\$7,500
Total Direct Costs				\$70,102	\$69,015	\$69,440	\$208,557
Indirect		0.4093		\$26,237	\$25,792	\$25,966	\$77,995
total Funds Requested				\$96,339	\$94,807	\$95,406	\$286,551

Resources for Proposal Development – OSRA Website

Grant Funding Opportunities

- InfoED **SMARTS** service – available to SSU employees

Approved rates needed to prepare the **budget**

- ✓ Fringe Rates
- ✓ Indirect Rate

Forms

- ✓ Intent Form
- ✓ Approval Form
- ✓ FCOI Form

Our **office door is open** – call for technical assistance

Grant Writing is a Long Term Process

Takes Months to develop a quality proposal

Reviewers take 6-9 months to finish the review

If you are not funded

- Don't be discouraged, persist: take advantage of reviewers' comments & re-submit
- Majority don't get funded 1st time; the odds increase significantly the 2nd round

Funding agencies:

- ❖ **Stay in touch with program officers** (network at conferences, email them, send white papers)
- ❖ Get on agency mailing lists for funding announcements
- ❖ **Be a reviewer (best way to learn what makes a competitive proposal)**

Develop collaborations with other universities

Grants writing workshop will be presented later in semester by Dr. Chetty, OSRA is always available for assistance with proposal development

New Award Process

1. Notify OSRA – send award notice
2. OSRA responsible for negotiating revisions to award with grant officers (where required)
3. After final award is made, OSRA:
 - Reviews Terms & Conditions with PI (RCR, animal care, FCOI, etc.)
 - Sends official new award to Grants and Contracts Accounting with:
 - Award Notice
 - Budget (Line Itemized)
 - Proposal

PI should not send award to Grants Accounting without going through OSRA first

Grants Accounting Responsibility

Grants and Contracts Compliance (GCC) is responsible for the overall fiscal management and reporting to funding agencies for all sponsored agreements awarded to Savannah State University. From account setup to ensuring compliance with 2 CFR 200 costs standards to tracking and reporting restricted funds, your grants accountant is your point of contact.

Katarah Harris	Lisa Senters
Title III	Department of Commerce
SAFRA	Department of Defense
Department of Health & Human Services	Department of Education
Department of Energy	National Science Foundation
Homeland Security	Title IV-E
Housing and Urban Development	State Grants
Department of Transportation	Private Grants

2 CFR 200 Requirements - Allowability

200.403 Factors affecting allowability of costs.

- Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:
 - Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
 - Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
 - Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
 - Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
 - Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
 - Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
 - Be adequately documented

2 CFR 200 Requirements - Reasonable

200.404 A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. In determining reasonableness of a given cost consideration must be given to:

- Is the cost ordinary and necessary for the operation?
- Does it follow sound business practices such as arm's-length bargaining?
- Is the price in line with comparable goods and services in the area?
- Did the individual making the purchase act with prudence given the circumstances?
- Did we, SSU, significantly deviate from our policies and procedures with this transaction?

2 CFR 200 Requirements – Allocable

200.405 To be allocable to a grant, a good or service must be chargeable to the grant relative with the benefits received. To meet this standard a cost must:

- Be incurred specifically for the grant.
- Be distributable in proportion to the benefit afforded to the grant using reasonable methods.
- Be necessary to the over all operation of SSU and this grant.
- Be properly documented.

Indirect Cost is an example of allocable costs. It includes organizational support and facilities and is allocated to the grant in accordance with our documented rate agreed to by DHHS.

Budget Statements

You should receive a budget statement from your grant accountant at least quarterly detailing the recorded costs incurred and planned compared to your grant budget by cost category.



BUDGET STATEMENT

As of: March 20, 2017

Grant Name: DOD-Acquisition of Dynamic Mechanical Analyzer
Grant Number: 2603-48 DOD ARO Acquisition of Dynamic Mechanical
Grant Period: POB: 07/25/2016 - 07/24/2017
PI: PI: Pascal Binda

	Budget	Expenses	(-)	Pending Changes	(=)	Available Balance
Personnel:						
Salaries	-	-	-	-	-	0.00
Fringe	-	-	-	-	-	0.00
Subtotal Personnel	-	-	-	-	-	0.00
Travel:						
Employee Travel	2,000.00	-	-	2,517.66	-	(517.66)
Non-Employee Travel	-	-	-	-	-	0.00
Student Travel	-	-	-	-	-	0.00
Subtotal Travel	2,000.00	-	-	2,517.66	-	(517.66)
Operating:						
Supplies	-	-	-	-	-	0.00
Equipment	215,678.00	134,298.92	-	44,141.53	-	372,375.55
Consultants/ Contracts	-	-	-	-	-	0.00
Other Operating	-	-	-	-	-	0.00
Subtotal Operating	215,678.00	134,298.92	-	44,141.53	-	372,375.55
Student Support:						
Stipends	-	-	-	-	-	0.00
Tuition/ Scholarship	-	-	-	-	-	0.00
Subtotal Student Support	-	-	-	-	-	0.00
Total Direct Cost	217,678.00	134,298.92		46,659.19		36,719.89
Indirect Cost	819.00					819.00
Totals	218,497.00	134,298.92		46,659.19		37,538.89
Percent of Budget	100%	61%		21%		17%

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Supporting Documentation

In addition to the budget statement, you may also receive supporting documentation that includes:

- **Reconciliation Report** - Shows budget by year vs expense by year and remaining balances
- **Transaction Log** – This will detail all expenses charged to your grant broken out by cost category and coded as either expensed or encumbered.
- **Encumbrance Report** – Lists all expenses encumbered meaning your grants accountant has received documentation about an approved expense but the expense has not hit the general ledger. In other words, it is a pending expense.
- **Salary Report** – A report showing who is getting paid a salary on your grant and how much they have been paid from grant funds.
- **Stipend/Tuition Report** – This report lists the students receiving funding from your grant either through stipend payments or tuition credits.

It is imperative that PI's review transactions to ensure costs have been properly categorized.

Time & Effort Reporting

Time and Effort:

Time & effort forms submitted to **OSRA** each semester, to **meet the 2 CFR 200 requirements**

- ✓ **Reported by semester** (except for Title III)
- ✓ Provide **documentation to meet audit requirements**
- ✓ Must report **cost share and release time**
- ✓ For both summer & AY, Effort **cannot exceed 100%** (State duties, teaching etc. + grant effort cannot exceed 100%)
- ✓ PI responsible to ensure everyone on team submits time & effort report
- ✓ Notify OSRA if new personnel join team
- ✓ Summer pay is requested using Summer Pay Form (OSRA website)

Post Award, continued

Prior Approvals

- No Cost Extension
- Change in PI
- PI transfer
- Reduction in PI effort > 25%

Spend Down of Budgets

Budget Amendments must go through OSRA

Programmatic Reports

Research Compliance

Critical Areas of Compliance:

- Responsible Conduct of Research (RCR)
- Financial Conflicts
- Protection of the Use of Human Subjects – Institutional Review Board (IRB)
- Animal Welfare-Institutional Animal Care and Use Committee (IACUC)
- Bio-Safety
- Radiation Safety

Responsible Conduct of Research

Statutory Requirement (NSF *COMPETES Act*; NIH GUIDE, Volume 23, Number 23, June 17, 1994)

The responsible and ethical conduct of research (RCR) is critical for excellence, as well as public trust, in science and engineering.

RCR training is also considered essential in the preparation of future scientists and engineers.

An institution must have a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers.

An institution must designate one or more persons to oversee compliance with the RCR training requirement. **For frequently asked questions on RCR, please visit**

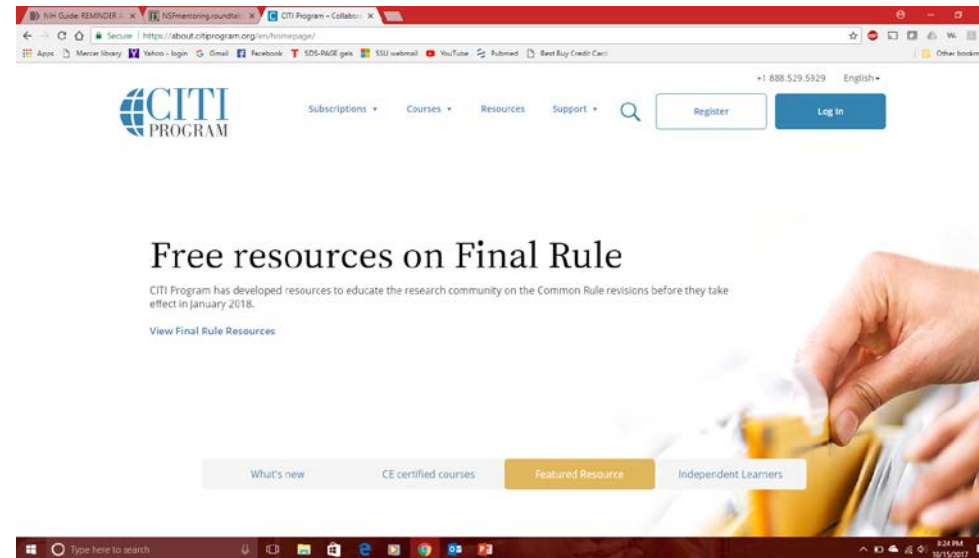
<https://www.nsf.gov/bfa/dias/policy/rcr/rcrfaqs.jsp>

Responsible Conduct of Research (continued)

What it means to you?

If your project trains or supports students in research, each (including PI) must complete RCR training prior to commencing research.

At SSU, we use CITI program, more details visit www.citiprogram.org.



For a complete list of courses offered by SSU through CITI program, click [here](#)

Financial Conflicts

Statutory requirement (42 CFR Part 50 Subpart F) *The 2011 revised regulation promotes **objectivity** in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research performed under NIH grants or cooperative agreements will be free from bias resulting from Investigator financial conflicts of interest. This regulation is commonly referred to as the Financial Conflict of Interest (FCOI) regulation. (<http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf>).*

Each grantee organization employing more than fifty persons to maintain an appropriate written and enforced policy on conflict of interest and that all conflicts of interest for each award be managed, reduced or eliminated prior to the expenditure of the award funds.

If the organization carries out agency-funded research through sub-recipients, contractors, or collaborators, the organization must take reasonable steps to ensure that:

- the entity has its own policies in place that meet the requirements of this policy; or
- investigators working for such entities follow the policies of the primary organization.
- An organizational conflict of interest policy requires that **each investigator** discloses to a responsible representative of the organization all *significant financial interests* of the investigator (including those of the investigator's spouse and dependent children).

Investigator includes principal investigator, co-principal investigators/co-project directors, and any other person at the organization who is responsible for the design, conduct, or reporting of research or educational activities funded by an external agency.

Financial Conflicts (continued)

- *Significant Financial Interest* includes income exceeding \$5,000 from
 - an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children
 - does not represent more than a 5% ownership interest in any single entity
 - salary, royalties or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children during the 12-month period

DOES NOT INCLUDE THE FOLLOWING

- *Salary, royalties or other remuneration from the applicant institution*
- *Income from seminars, lectures or teaching sponsored by public or non-profit entities*
- *Income from serving on advisory committees or review panels for public or non-profit entities*

What are your responsibilities?

- Fill out the **new** FCOI form before the proposal is submitted
- PI and Each individual with a substantive role must complete the form and update on an annual basis/new reportable significant financial interests are obtained
- Recommend to complete the *Financial Conflict of Interest* training in CITI

Protection of the Use of Human Subjects

Statutory requirement *The Federal Policy for the Protection of Human Subjects (Common Rule) published in 45 CFR 46 subpart A and NIH & NSF policies, research involving human subjects must address:*

- *Risk to subjects*
- *Adequacy of protection against risk*
- *Potential benefits of research to subjects and others*
- *Importance of the knowledge to be gained*
- *For clinical trials, data and safety monitoring plan (a data and safety monitoring board in case of Phase III trials)*

The **fundamental principle** of human subjects protection is that *people should not (in most cases) be involved in research without their informed consent, and that subjects should not incur increased risk of harm from their research involvement, beyond the normal risks inherent in everyday life.*

The grantee institutions have the responsibility for setting up "**Institutional Review Boards**" (IRBs) to review research protocols and designs and ensure the protection of the rights of human subjects.

- Institutions have two kinds of reviews:
 - Full board (entire IRB reviews the proposal)
 - Expedited (the IRB chair or a designated member by the IRB chairman reviews the proposal for the committee)
 - Research using survey/observational or ethnographic methods/cognitive and educational tests, etc. is considered "Exempt" unless the below apply
 - The information obtained would allow the subjects to be identified, AND
 - The disclosure of the data would reasonably put the subject at risk

Protection of the Use of Human Subjects (continued)

What must you do?

Complete the *Responsible Conduct of Research & Human Subjects Research* training module in CITI program

Submit a completed IRB application for review

- Completed IRB form
- Summary of the proposed research
- **Informed consent**
- Copy of the survey/testing instrument
- A copy of the CITI completion certificate
- Other documents as required

Submitted the completed application to irb@savannahstate.edu

Everybody involved the project (including students) are required to complete CITI training

SSU IRB details can be accessed at <https://www.savannahstate.edu/osra/support/Research%20Compliance/irb.shtml>

Contact persons:

Dr. Deden Rukmana, Chairperson, SSU Institutional Review Board, rukmanad@savannahstate.edu

For more details on application submission or other inquiries, email irb@savannahstate.edu, or kencheh@savannahstate.edu

Animal Welfare

Statutory requirement - *Animal Welfare Regulations (USDA 1985; US Code, 42 USC § 289d) and the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS 2002)*

The PHS Policy requires the following:

- Institutional Animal Care and Use Committee (IACUC) members to evaluate and prepare reports on all of the institution's programs and facilities (including satellite facilities) for activities involving animals at least twice every year.
- requires training or instruction for scientists, animal technicians and other personnel involved in animal care, treatment or use
- Institutions are required to provide PHS with the date of IACUC approval.
- SSU has a PHS Assurance # D16-00626 (old assurance # A4261-01), with validity up to May 31st, 2020.
- The IACUC, through the Institutional Official (IO) is responsible for compliance with reporting requirements.

Contact person for IACUC at Savannah State University: Dr. Elissa Purnell, SSU IACUC Chairperson, purnelle@savannahstate.edu

If your research requires animal models,

- Complete *Laboratory Animal Welfare* training in CITI
- Submit a detailed protocol describing animal use to SSU IACUC
- Protocol modifications require approval by IACUC
- SSU has a small animal facility for use in Drew Griffith building, suitable to house mice and rats only

BioSafety/Biohazard

- Office of Science Policy (OSP) requires all grantees performing research involving recombinant/synthetic nucleic acid research shall comply with guidelines published in **81 FR 22286**. (NIH/NSF- funded)
- **Institutional Biosafety committee (IBC)**
 - Mandated by the guidelines
 - Protocols/procedures must be approved by IBC
 - Record keeping and available to NSF upon request
 - SSU Biosafety committee is being reorganized, current chairperson is **Dr. Takayuki Nitta**, Assistant Professor of Biology, nittat@savannahstate.edu

Radiation Safety

- SSU is authorized under **GDNRR Chapter 391-3-17** (License # GA1102-1, Exp May 2020)
- SSU's policy
 - Control use of radioactive materials
 - Safety of personnel
 - Compliance with federal/state/local regulations
- **Dr. Chellu S. Chetty** is the Radiation Safety Officer (RSO), chettyc@savannahstate.edu
 - Implement policies/procedures; coordinate safety evaluations
 - Coordinate the safety evaluations of all proposed user applications and uses of radioactive material
 - Write and publish general guidelines or procedures for radiation safety
 - Maintain all records pertaining to the radiation safety program

Questions/Surveys

Nancy Riggs, Director, OSRA, ext. 4427

Harsha Kenche, Administrative Systems Manager, Ext. 4426

Katarah Harris, Manager, Grants & Contracts Accounting, ext. 4049

Lisa Senters, Senior Grants Accountant, ext. 4032.

See OSRA website for resources/news

<https://www.savannahstate.edu/osra/index.shtml>