POLICY ON GRANTS AND OTHER SPONSORED PROGRAMS

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Reason for Policy/Purpose Update

The University strongly encourages faculty and staff to seek support from federal, state, and other external agencies, including foundations for research, training, and other scholarly endeavors. This activity, in addition to providing additional resources, strengthens teaching and learning by affording Dillard students and faculty opportunities to embrace new technologies and discoveries.

Policy Statement

This policy document is intended to serve as a guide for developing and submitting applications and proposal requests in accordance with university and general agency guidelines. This document also includes a series of relevant institutional policies that provide guidance in the implementation, reporting, and closeout of sponsored agreements. Comprehensive processes are outlined within the Research and Sponsored Programs Policies and Procedures document.

Who Needs to Know This Policy

This policy is applicable to university employees who intend on submitting requests to external agencies for support of research, training, outreach, or other activities to be carried out with university faculty, staff, or students. These policies are applicable to employees with all or some of their salary supported from externally-sponsored agreements, as well as those who supervise or provide service to such programs. This includes, but may not be limited to, the following:

1. Principal Investigators
2. Grant Directors
3. Departmental administrators and support staff
4. Faculty and Staff with all or part of their salary/effect charged to federal awards
5. Faculty and staff submitting applications for external funding (private and government)
6. Approvers of grant expenditures, agreements, reports, and other documentation (routing forms, budget documents, effort, budgets, applications, etc.)
Policy/Procedures/Accountability

See attached.

Website Address(es) for this Policy
http://www.dillard.edu/_administration/_institutional-advancement/research-and-sponsored-programs/index.php

Contact(s)

Office of Research and Sponsored Programs

Who Approved this Policy

History/Revision Dates
Origination Date:
Cabinet Approval Date:
Updated:
Revised:

Agreement – Signature
OFFICE OF RESEARCH AND SPONSORED PROGRAMS

Policies and Procedures

Rev. 2018
PART 1

PRE-AWARD ADMINISTRATION

The Proposal Process

SPONSORED AGREEMENTS

Sponsored Agreements are externally-funded projects and activities in which a formal written agreement, i.e., a grant, contract, or cooperative agreement, is entered into by the University and by the sponsor. A sponsored project will typically have a specified statement of work, line-item budget, and period of performance.

Along with the statement of work, sponsored agreements are also usually characterized by detailed financial accountability requirements. These characteristics help to distinguish sponsored agreements from other funding. Further, these agreements are typically awarded in response to a detailed statement of work and a commitment to a specified project plan, and are supported by both a project schedule and a line-item budget.

The terms of sponsored agreements usually specify allowable and unallowable costs, as well as stipulations for revisions and prior approvals. Agreements typically require regular financial reporting and audit practices consistent with The Office of Management and Budget’s (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance").

Types of Awards/Basic Awards

Grants

Grants are generally awards made to the University by local, state, and federal agencies and private foundations and corporations that are provided for specific purposes, services, projects, and/or research. The Office of Research and Sponsored Programs (ORSP) facilitates the process of securing and managing grants from public sources. The Office of Development facilitates the process of securing and managing grants from private sources. Grants require institutional approval and oversight. Funds awarded to the institution must be spent according to the stipulations of the funding agency, and are subject to audit.

Contracts

Contracts are similar to grants, in that they are awards made to the University and therefore require institutional approval (at the time of submission) and oversight (after the award has been made). They differ in that they are legal instruments in which the project director/institution promises to perform
certain designated services and/or deliverables for specified costs.

**Sub-contract/Sub-Grant/Sub-Recipients/Consultant Services**

Sub-contracts/Sub-grants are made to the institution from other institutions or entities that serve as prime contractors or grantee to funding agencies or sponsors. Generally, the stipulations governing grants and contracts also apply to sub-awards. Dillard considers a consultant a firm or an individual retained to provide professional advice or services for a fee but not as an employee of the performing organization.

Allowable costs include fees, travel, and subsistence costs. All consultant payments are comparable to the normal or customary fees charged and received by consultants for comparable services on non-government contracts and grants. Consultant agreements will consist of services justification, deliverables rendered, duration of agreement, compensation rate, reporting requirement, and any special terms of the award. The University’s Office of Legal Affairs has detailed policies regarding consultants and other sub-award agreements.

When preparing proposals for extramural funding that include a transfer of a portion of the funds to another institution or organization, or payment for professional services, a determination must be made during the proposal development stage regarding the appropriate mechanism to cover such costs.

A sub-award, sub-grant, or sub-agreement is a document written under the authority of and consistent with the terms and conditions of a prime award (a grant, contract, or cooperative agreement) that transfers a portion of the funds to another institution or organization.

A consultant is an individual hired to give professional advice or service for a fee but not as an employee of the hiring party. The term "consultant" may also be used to designate a firm that provides professional advice or service. Recipients of federal funds are expected to have policies governing their use of consultants that are applied consistently regardless of the source of support. Moreover, the Principal Investigator/Program Director is expected to justify using consultants instead of salaried employees. Most sponsors require that justification be included in the proposal for the use of sub-recipients and/or consultants.

The PI is responsible for monitoring progress reports and invoices for compliance with the terms of the contract. As a result, the PI is expected to:

- maintain good communication with the sub-recipient PI;
- review sub-recipient institution's reports and incorporate them into the project's progress reports; and
review all invoices to ensure that expenses are appropriate and aligned with technical progress.

Payments of sub-recipient invoices must be approved by the PI. Non-compliance with technical reporting requirements or dissatisfaction with level of sub-recipient progress should be reported immediately to ORSP. If there are issues with costs and/or work progress, the PI should not sign off on the invoice in question. A revised invoice will be requested from sub-recipient or the invoice will be suspended until issues are resolved.

Fellowships

Fellowships are awards typically made directly to individuals and generally have restrictions, which differs from grants and sometimes require only applicant signatures. However, they must have the approval of the divisional dean and the Provost as they often require release time. They are processed through the institutional routing process (ORSP Grant Routing Form).

Faculty Staff Time and Compensation

Hiring of Faculty and Staff on External Funds

The hiring of full time, part time, temporary employees and consultants using external grant, contract and/or gift funds must follow Dillard University policy and federal employment laws. Establishment of third-party agreements are subject to University and federal guidelines and must consist of services justification, deliverables, rendered, duration of engagement, pay rates, reporting requirement and any special terms of the award.

Intra-departmental consulting is assumed to be undertaken as a University obligation requiring no compensation in addition to full-time base salary. Therefore, faculty members who function as consultants or otherwise contribute to the fulfillment of a sponsored agreement conducted by another faculty member of the same department will not be granted release time or increased compensation.

Ending of a Grant Cycle

Positions funded from grant proceeds are limited to the terms outlined in the grant. Three (3) months prior to the end of a funded grant, the Dean/Department Chair will notify applicable Vice President of any positions that will be discontinued due to the closing of a grant. The Vice President will recommend the appropriate action to the Vice President for Business and Finance and President regarding the position in question.
**Principal Investigator**

The Principal Investigator (or project director) is the individual who has overall responsibility for carrying out the sponsored project and ensuring that all requirements of the funding agency and the institution are met. The PI conceives the project, prepares the proposal (with the assistance of ORSP as needed), manages the day-to-day conduct of the project (including its financial administration, which is managed in concert with the Office of Business and Finance), and submits technical progress and final reports as necessary. Some agencies allow two or more individuals to act as co-PIs.

**Workload and Compensation**

Faculty and staff involvement in externally funded projects must be approved by their Deans, directors and the respective Vice President prior to submitting the grant application. All faculty and staff engagement must follow Dillard University guidelines as stated in the faculty and staff handbooks. Compensation for faculty and staff as it relates to externally funded programs must follow the ORSP Policies and Procedures, as well as comply with 2 CFR 200, Uniform Guidance for Federal Programs.

**Full-Time Faculty (Nine-Month Contracts)**

In accordance with Dillard University and the federal Office of Management and Budget (OMB) policy, faculty compensation for the period under which they are covered by an employment contract typically may not exceed the salary amount stated in their employment contract. Faculty members, while under contract, are exempt employees of the University and are bound to the requirements and expectations of this classification of employee status.

Salary and fringe benefit costs recovered through grants are applied by the University to the corresponding amount of time expended by the faculty member as stated in the grant. The following categories apply to time-related activity, which may result from grant requirements:

**Faculty Release Time**

The Dillard University’s Faculty Handbook guides the policy as related to faculty workload. This policy must be observed at all times. Release time associated with a sponsored agreement must be requested and approved prior to the submission of the proposal/contract request, and clearly identified within the proposed budget and indicated on the ORSP Routing Form. Faculty Release time charged to federal grants, contracts, or other sponsored agreements, must be calculated using the faculty member’s base salary rate and must be supported by the sponsored agreement. A portion of this amount may be proposed as cost sharing from other non-federal sources. All proposed cost sharing must be approved prior to grant submission. Requests for
compensation during summer months must be proposed/budgeted in addition to release time requests.

**Summer Work Load**

Grant proposals may include full-time salary support for faculty members who are on a nine-month contract for grant related work that is conducted during the summer. Such support is calculated at up to three-ninths (3/9) of the academic year salary. However, some agencies limit the amount of summer and/or academic year support. In those instances the limits set by the sponsoring agency will be observed.

**Summer Salary Compensation Example:**
If the base (9-month Salary) = $65,000, the maximum Summer compensation would be calculated accordingly:
$65,000 / 9 (months) x 3 (months) = $21,667

**Extra Compensation (Academic Year)**

However, in rare and unusual cases, additional compensation may be paid to 9-month faculty on sponsored agreements during the academic year. In accordance with federal guidelines, additional compensation may be provided only in cases where service: a) involves consultation across departmental lines; b) involves a separate or remote operation; and c) in such cases where the work performed by the faculty member is in addition to his or her regular departmental load. In any event, compensation cannot exceed the base salary rate for the participating faculty member(s).

The base salary rate is calculated at [9-month salary/185 days]. The total received in extra-compensation during the academic year cannot exceed 20% or the equivalent of 37 days. All such charges must be justifiable and requested prior to the services being performed, and arrangements must be specifically provided for in the sponsored agreement or approved in writing by the sponsoring agency and the appropriate University administrators. Extra compensation should not be requested for periods during the sponsored agreement where release time has been granted.

**Example: Extra-Compensation (Academic Year):** If the base (9-month salary) is 65,000, the maximum extra-compensation would be calculated accordingly:
$65,000/185 (days) x 37 (days) = $13,000 (max)

**Staff/ Non-Exempt Employees**

Non-exempt employees may be eligible to receive compensation in excess of their existing base salary provided that 1) the proposed work will be
conducted outside the staff member’s regularly scheduled hours; 2) the grant budget allows for compensating non-exempt staff; 3) payment to the staff member is in compliance with the guidelines established in the employee handbook for outside employment and/or overtime compensation; 4) is in compliance with all employment laws and regulations as outlined by the Federal government; 5) a written request outlining the details of the need has been submitted to the applicable vice president for consideration; and 6) formal written approval of the request has been provided by the vice president.

**Participant Costs**

Participant costs calculations include payment to students and/or participants in workshops, surveys, studies, etc. Participant costs may include stipends that are usually small fixed amounts to compensate participants for their efforts. Participant costs may also refer to researchers or scientists attending a conference, or participants in a foreign collaboration. For those grants with allowable indirect cost rates less than Dillard’s negotiated rate (U.S. Dept. of Education, training grants, etc.), all costs are included in the indirect cost base unless otherwise not allowed by the sponsor.

**Conflict of Interest**

Conflict of Interest policies and procedures have been developed relative to externally funded projects consistent with 2CFR200 and specific agency requirements. COI policies applicable to every employee participating in externally funded research and other programs.

Investigators should annually report all potential financial interests and other conflicts posed by themselves, their spouse and dependent children. "Significant Financial Interest" is defined as anything of monetary value, including but not limited to, salary or other payments for services (e.g. consulting fees or honoraria); equity interests (e.g. stocks, stock options or other ownership interests); and intellectual property rights (e.g. patents, copyrights and royalties from such rights), which would reasonably appear to be affected by the research to be funded. Each investigator should review the University’s full policy regarding conflict of interest found in the Dillard Employee Code of Conduct Handbook (Sections 2.5 and 3.0).

Disclosures will be made by use of the Disclosure of Potential Conflict of Interest document on an annual basis and when new significant financial interests are acquired.

The policy requires you to make the appropriate disclosure statement (1) before receiving a financial interest that would create a conflict of interest for which disclosure is required, or (2) if the financial interest already exists, before
commencing any activity that would create a conflict of interest for which disclosure is required.

Guidance Provided: 2CFR200 and Dillard University Employee Code of Conduct Handbook are applicable to all federally sponsored agreements. Conflict of Interest Forms must be completed and submitted to the Office of Human Resources annually.

**Protecting Human Research Participants (PHRP)**

All students, principal investigators, faculty, and other staff currently involved in or planning to submit or be a part of federally sponsored research must complete the National Institutes of Health PHRP training and certification. Researchers must certify annually throughout the life of the sponsored agreement/research. The PHRP training and certification can be accessed at [https://phrp.nihtraining.com/users/login.php](https://phrp.nihtraining.com/users/login.php).

**External Funding Sources**

The Office of Research and Sponsored Programs assists potential investigators in identifying funding opportunities and agencies through a variety of printed and electronic resources. Major printed sources include:

- The National Institutes of Health (NIH) Guide to Grants and Contracts;
- National Science Foundation (NSF) Bulletin;
- U.S. Department of Education; Health Resources and Services Administration (HRSA) Preview; The Catalog for Federal Domestic Assistance (CFDA); and The Federal Register.

Electronic resources include:

- InfoEd Global/SPIN
  
  [https://spin.infoedglobal.com/Authorize/Login](https://spin.infoedglobal.com/Authorize/Login)
- Louisiana Board of Regents [www.regents.state.la.us](http://www.regents.state.la.us)
- Health Resource Services Administration (HRSA) [www.dhhs.gov](http://www.dhhs.gov)
- Department of Health and Human Resources [www.dhhs.gov](http://www.dhhs.gov)
- Department of Housing and Urban Development [www.hud.gov](http://www.hud.gov)
Electronic access is available to other funding sources through the ORSP, as well as linkages to electronic services, including [www.grants.gov]. ORSP will also assists potential investigators in matching their project/research interests with applicable funding sources and deadlines.

**Grant submission and preparation**

With the exception of those special opportunities identified by the President, the writing of grants begins with divisional strategies plans and case statements. They must be approved by the Dean or director and the area Vice President.

**ORSP Grant Routing Form**

The process for any application for external funding begins with the ORSP Grant Routing Form. The routing form is to be submitted along with the project cover page, abstract, budget, and necessary assurances to the ORSP at least ten (10) business days prior to the submission date.

Where applicable, Notices of Intent should also be routed with the ORSP Grant Routing Form, beginning with the principal investigator and respective dean. The processing of the Routing Document ensures compliance with University and agency policies prior to submission of the proposal or contract request. The ORSP currently utilizes Adobe Sign electronic routing and signature application to process routing forms and other select ORSP documents and agreements. The Routing Form must prepared and routed electronically via Adobe Sign or the current approved/support application. All applicable signatures/approvals must be obtained through the routing process.

**Grant Assistance and Submission**

The ORSP is available to provide assistance to potential PIs in developing components of the application. Typically, assistance is provided in areas including project budgets, budget narratives, evaluation, submission and sustainability. In order to secure necessary institutional approvals, completed proposals must be submitted to the ORSP for public agencies at least ten (10) business days prior to the submission date. Although rare exceptions may be granted, submittal to ORSP by the internal (10-day) deadline better ensures submission of the application to the sponsoring agency by the agency deadline.
Applications received after the internal deadline are at risk of not meeting internal approval and completion in time to meet agency deadlines.

**General Proposal Format**

The proposal is a comprehensive description of the project and usually consists of two main parts: a technical or narrative section and a budget. Almost all funding organizations have guidelines that must be followed. Most federal agencies supply their own forms, which can be obtained from either the ORSP or Development or from the agency’s web site. A proposal usually includes the following sections:

**Cover page:** A quick reference sheet containing selected information about the proposal. The signature of an authorized organizational representative commits the University to carry out the project if funding is received and certifies that statements contained in the proposal are true.

**Abstract or Project Summary:** The abstract is a brief synopsis of the proposed project. Though brief and usually limited to 300 words or less, the abstract is the initial opportunity for the reviewer to appreciate the project. Therefore, this section should be a concise, clear representation of the design, operation and outcome of the proposed project.

**Statement of Work:** A full and detailed description of the project usually includes background, goals and objectives, methodology, significance, personnel, etc. Some funding sources specify page limits. Most agencies provide review criteria to guide the development of this section.

**Supplementary materials:** Bibliography, curriculum vita (e), resources and facilities, other support, appendices (where appropriate).

**Budget and budget justification:** Cost estimate for the execution of services, resources, and personnel associated with the project.

**Budget Development**

An important component of all grants and contracts is the development of a cost proposal or budget. Most sponsoring agencies have established general budget items. Budgets or cost proposals associated with sponsored projects or contracts must be developed in conjunction with the ORSP and Business and Finance. In instances where expenses for technology are involved, the Office of Information, Technology, and Telecommunications must also be consulted. Prior to submission to funding agencies, budgets and/or cost proposals **must be reviewed by Sponsored Programs subsequently approved** via the Grant Routing Form.
In addition to the standard budget/line items (Personnel/ Salaries, Equipment, Supplies, Travel, Training Stipends) the University also has compliance mandates regarding cost proposals/budgets.

**Fringe Benefits:**

The University’s fringe benefit rate is subject to review and adjustment annually. PIs should ensure the correct rate is being applied by obtaining the current rate from the ORSP or the Office of Business and Finance prior to grant submission. In some instances, the funding agency may stipulate different or “maximum allowable” rates for fringe benefits.

**Indirect Costs**

Include costs that are incurred for common or joint objectives and therefore cannot be readily and specifically identified with a particular sponsored project, instructional activity or institutional activity. All grant proposals submitted to prospective agencies are required to include indirect costs in the proposed budget, unless otherwise prohibited by the agency. The current approved indirect cost rates for the university are on file within the ORSP and Business and Finance. To ensure that the correct rate is being applied, PIs must contact ORSP prior to completing budgets or cost proposals.

**Cost-Sharing**

All cost sharing must comply with the institution’s policy on cost sharing (Appendix II).

**Program Income**

Program Income is that which is considered as “gross income” earned by a grantee that is directly generated by the grant-supported project or activity or earned as a result of the award. All program income ownership becomes a part of the sponsored grant or contract.

**Research Support**

Budget development may include support for activities and equipment for use by the faculty member to executed the terms of the grant and to further his/her scholarly interests, either on independent research or collaborative research with students. Given the goals and objectives for undergraduate research at Dillard, faculty should, where feasible include collaborative research components in proposals with one or more students, if the grant allows.

**Equipment and Materials Support**

All equipment and materials purchased on sponsored agreements are and will remain the property of the University, unless otherwise stipulated by the
award agreement or granting agency policy.

**Travel Support**

Budget development will include support for travel associated with executing the grant, dissemination of project findings for publication purposes, professional meetings and other appropriate professional development.

**Proposal Processing**

Prior to submission externally, proposals and applications must be routed and approved, (via **ORSP Grant Routing Form**) by appropriate University officials. The ORSP Grant Routing Form must be routed for signature utilizing the ORSP’s current e-signature process. ORSP currently utilizes the Adobe Sign software and process to route grant applications internally prior to submission. All perspective investigators should contact the ORSP for assistance/instructions on routing via Adobe Sign.

**Principal Investigator/Project Director**

The PI/PD certifies that the information included in the proposal is correct; the project complements or supports the investigator’s research, instruction and/or public service responsibilities at the University; space, facilities, and matching funds statements have been completed; commitments have been obtained; and oversight committee approvals have been secured. Further, the PI/PD certifies that he/she agrees to the commitments outlined in the proposal contract and will fulfill the responsibilities in conformity with University policies and procedures as well as those of the funding agency.

**Dean/Division Chair**

The division chairperson submits the proposal to the Dean. The Dean’s review relates to the knowledge of the contents of the proposal substance and merit of the proposal; and concurrence with the submission of the proposal, which is consistent with the role, scope and mission, educational and research thrusts of the unit.

**Applicable Vice President**

The Provost/Vice President for Academic Affairs’ signature supports the submission of the proposal and endorses the curriculum, programmatic, and budgetary impact to the University.

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

Review by the ORSP ensures that 1) the proposal has been approved by
appropriate persons; 2) budgets reflect appropriate financial requirements; 3) University policies and procedures have been followed; the approval signatures are in order; 4) assurances have been met; and 5) the proposal meets the general administrative policies and procedures of the University and the potential sponsor. Any extraordinary requirements should be brought to the attention of the applicable vice president and the ORSP by the PI/PD, to obtain approval from appropriate University officials.

**Vice President for Business and Finance (VPBF)**

Review by the VPBF (or designee) ensures that all budgets are accurate and have been developed in the best interest of the University, and that all other fiscal requirements of the proposal, including fringe and in-direct costs are appropriate and comply with University and funding agency guidelines. The University’s cost share portion must be consistent with University resources.

Prior to final commitment of the University, a cost sharing account (where necessary) must be established by the P.I. via, the ORSP Routing process. This account must be established within the Office of Business and Finance in association with the Sponsored Project.

**Vice President for Institutional Advancement (VPIA)**

Review by the VPIA ensures that all university stipulations have been met and the proposal activities support the Division’s strategic plan and university’s mission.

**President**

Review by the President ensures that university stipulations have been met and the proposal activities support the institution’s strategic plan.

**Timely Submission to the Office of Research and Sponsored Programs**

The PI/PD must arrange to submit his/her completed proposal at least ten (10) business days before the deadline date. By the same token, special administrative requests for the writing of a proposal must be submitted to the division thirty-days in advance if deadline exceptions are to be considered. The proposal must be reviewed for accuracy, general appearance, budget, space requirements and other aspects. The PI/PD should be aware that there may be several faculty and staff members submitting proposals at the same time that may cause delay in processing the submission. Therefore, an ORSP Grant Routing Form must be submitted for each proposal to be processed.
Proposal Revisions

Proposals often are accepted on technical merit, but the funding agency may request changes in the scope of work or budget prior to funding. In the event a revision substantially alters the statement of work, the time/effort of the faculty or staff involved, the budget, or the University's cost-share portion of the budget, the department chairperson and the applicable Vice President, Vice President for Institutional Advancement, and Business and Finance must approve the application prior to resubmission to the sponsoring agency. In the event the funding agency requests a budget revision or modification, a Budget Revision Form must be completed, approved by ORSP and Office of Business and Finance and submitted with all authorizing signatures.

Submission of Proposals for Individual Awards

Awards for summer appointments, travel funds, fellowships and sabbatical leave and other such awards may sometimes be paid to the individual rather than to the University. Individual faculty and staff members may submit applications for these types of awards, but are obligated to keep the department chairperson and the respective academic division informed of such activity. If a University contribution is required, the normal University approvals are required.

Unofficial Proposals

All proposals submitted to external agencies on behalf of the university MUST adhere to university procedures and be routed through the various areas for approval, and routed through ORSP for processing. Proposals that are not endorsed by the University may be withdrawn from consideration.

Limitation on Number of Proposals Submitted

The University will not endorse more than one application for a major proposal (e.g. Center, Consortia, etc.) to the same agency. In the event that a program announcement states that only one application may be submitted by an institution, the University will endorse only one for submission. If units or individuals wish to submit a response to such requests, the proposal developer should submit a Notice of Intent via the ORSP Grant Routing Form. In the event that more responses are received than are permitted by an institution, the appropriate dean (if several departments are involved), and the applicable Vice President (if several divisions/units are involved) will make the final decision as to which proposal should be fully developed/submitted. A standardized notice of intent is on file in ORSP, provided that the funding agency doesn't require the submission of an intent notice.
Copying and Submitting the Proposal

The vast majority of proposal requests are submitted electronically. However, some agencies may request hard copy proposal submission. In this event, once the proposal has been signed, the Office of Research and Sponsored Programs will make the number of copies required by the agency. When possible, appendices, which require multiple copies, should be submitted for copying well in advance of the mailing deadline. The Office of Research and Sponsored Programs will mail proposals, which have a postmark deadline by first class mail with return receipt requested. When a proposal must be received by a certain date, overnight mail will be utilized.

For proposals being submitted electronically, once internal approvals have been obtained, and all elements of the application have been addressed and completed, all revisions made, the ORSP has the responsibility of endorsing and submitting applications electronically to the applicable agency, via grants.gov, Fastlane, era commons/assist, etc. Any changes to electronic submissions must be requested in time to be addressed prior to the agency deadline. Changes after the deadline will result in withdrawal or disqualification of the application.

Summary Points to Remember:

All proposals must be submitted to ORSP or Development at least ten (10) days prior to the submission deadline. All necessary approvals must be obtained prior to submitting the proposal.

The proposal must be thoroughly checked for accuracy and completeness before being mailed to the prospective funding agency. This means that the proposal should be free of grammatical errors; the format should meet the requirements of the sponsor as specified in the RFP; recommendations from the potential sponsor about paper size, color, typing, binding and other particulars should be followed; and the copies should be carefully collated. The required number of copies of the proposal must be sent to the sponsor. Instructions from each agency will stipulate the number of copies required.

Part 2 Post Award Administration

Post Award

The Post Award section is designed to assist in the process after an agreement has been awarded. These procedures are used as a reference guide to the Principal Investigator or Project Director to inform them of the terms and conditions of an award to the University. The Post Awards Administrator (PAA) is available to assist PIs and PDs with questions related to the
grant/contract process and reporting requirements to ensure compliance with the funding agency. The PAA monitors the budget to help ensure funds are expended in a timely manner in accordance with the terms of the grant and to help protect against over expenditure of grant funds. This section will include the following:

- Principal Investigator or Project Director
- Approval of Funding
- Award Negotiation
- Post Award Meeting
- Business and Finance Office
- Internal Budget Transfer/Modifications/Revisions
- Matching
- Reporting Requirements

**Principal Investigator or Project Director**

The Principal Investigator has the overall responsibility for the conduct of the project described in the proposal. PIs are expected to expend their project funds according to the categories specified in the approved grant budget and within the time frame defined in the award. PIs are also responsible for ensuring that anyone performing work supported by the grant also understands the relevant guidelines. Another primary responsibility is the filing of interim and final project reports and extensions if necessary as required by the funding agency. PIs are required to meet with the Post Awards Administrator to discuss ways to make oversight of the grant process and budget easier to accomplish. Overall, the ORSP along with Business and Finance Office can assist PIs understand and interpret Federal, State, Local and other regulations concerning grant execution.

**Approval of Funding**

Once the agency has approved funding, a formal notice will be sent to the PAA, recommending approval of funding if the proposal meets the criteria for acceptance established by the agency. The PAA will then notify the PI/PD of the sponsoring agency’s decision. In the event that PI’s are contacted directly by the funding agency regarding their award, a copy of the award notification must be forwarded immediately to either the ORSP (public agency) or the Development Office (private agency). A written notification of award or acceptance of the offer must be kept on file in the ORSP and furnished to the Business and Finance Office. The award notification typically identifies all terms and conditions of the grant or contract.
The terms and conditions should include the following information:

- Agency project identification number
- Award Period
- Award Amount
- Principal Investigators
- Terms of Acceptance

- Other applicable information whether listed or incorporated by reference
- Authorized signature of the Dillard University
- Authorized signature of the Awarding Agency
- Established Approved Budget

Upon receipt of the award notification, the ORSP will review the award to insure that it complies with the original proposal. The office will then confer with the principal investigator, B&F and other administrators to discuss, review the terms of the grant and resolve any discrepancies.

PI/PD’s may not sign agreements for research and development support (including grants and contracts), cooperative agreements, teaming agreements, Federal and State disclosures and regulatory compliances, patents or copyright licenses, protection from research risks assurances, product sharing equipment loans and gifts.

These and similar agreements bind the University to certain obligations and, as such, can only be signed by those who have signature authority. Individuals who enter into personal agreements will not necessarily have access to University facilities or be covered by University services, including professional or general insurance and security.

Award Negotiation

In some cases, the award amount will deviate significantly from the proposed application. In these cases, a revised Scope of Work, project plan, and/or budget may be necessary. In collaboration with the PI and applicable administrative offices, the ORSP will negotiate the terms of the proposed award with the sponsor on behalf of the PI and the university. This may necessitate revisions to the budget, cost-sharing, and PI effort level. Once agreement has been reached, the final award document will be routed and submitted to the PI and Finance to establish appropriate post-award accounting information.
Post Award Meeting

A post award conference meeting will be conducted to advise the PI/ PD of requirements under the terms of the contract/award. This conference is a prerequisite to any authorization to expend funds. This meeting may be done in person (for new PIs) or via conference call, (adobe connect, google hang out, etc.) for returning PIs.

Upon receipt of notification and acceptance of the award, a post award meeting will be held between the PI and the PAA Administrator and the Office of Business and Finance (Grants Management). The extent of the agenda for these meetings will depend on the type of award, and will provide the following information:

- Assignment of account number
- Details that relate to established pre-spending guidelines
- Financial matters including budgeting and reporting
- Fiscal accountability, compliance, and reporting
- Required technical reporting including contractually required reporting schedules
- Procurement requirements, regulations and procedures, including sub awards.

Business and Finance Office

Once the grant agreement has been executed by both the University and the sponsoring agency, the ORSP will transmit copies of the agreement and the proposal with an approved budget to the PI/PD, and Business and Finance.

The Business and Finance Office subsequently provides an account number (cost center) for the project. In order to facilitate the assignment of an account number, the following documents must be submitted:

- A summary/copy of the proposal
- A final copy of all grant/contract procedures
- A copy of specific terms and conditions, if applicable A copy of the fully executed award/contract
- A copy of all reporting and billing forms
- A copy of the final negotiated and approved budget
- A copy of the budget by object classification in accordance with the established classification of the University

Upon review and approval of the documents, an account contract number will be assigned and University notification of award will be provided to the PI/PD from the Business and Finance Office. This notification shows the title of the project, the PI/PD, amount of the award, time period involved, the sponsoring
agent, and the account number assigned. Pre Award Accounts & Special Awards. The Business and Finance Office will not routinely establish an account prior to receipt of an award document. If a pre-award account is deemed essential for a project, a written request for a contingent account must be provided by the sponsoring agent to the ORSP indicating that an award has been made and the project arrival date of the award document. A pre-award account will then be established according to the guidelines and regulations of the University. In some instances, awards or extensions may be made to the University without the submission of a formal proposal. The PI/PD should become cognizant of the standard policies and procedures governing the award. The award documents should be reviewed for restrictions, special instructions and other requirements that governs or restricts spending under the terms of the award.

**Account Set-up**

Prior to the establishment of any grant or sponsored project account, a Budget Development/Revision Form must be completed by the PI and submitted to the PAA, along with a copy of the agency approved budget and/or award notification. The final negotiated or award budget may be acceptable provided the budgeted line-item are in accordance with the University’s current line-items budget/object codes. Once this form has been completed and signed, the Office of Business and Finance will establish a Cost Center and Project Code needed to generate expenditures and requisitions. In the event that budget revisions are required after the award, the Budget Revision form must be completed and/or submitted to the ORSP for processing prior to approval of requisitions or new expenditures. Budget revisions require the authorization of the PI, Unit Head, ORSP, and Business and Finance, and possibly the sponsoring agency.

**Multi-year Grants**

Multi-year grants/agreements are considered those that extend beyond one fiscal and/or program year. Some agencies allow funds to be carried from one year to the next. For each year of funding for multi-year grants/agreements separate budgets must be established utilizing the Budget Revision Form and the same Cost Center Code may be continued throughout the life of the award.

Adequate documentation to support the cost-sharing plan must be provided during the post award conference, including meeting cost sharing requirements and reporting for cost sharing consistent with the terms of the award. The award can be temporarily suspended if the PI/PD fails to comply with cost sharing requirements.
Financial Compliance

The PI/PD or their appropriate representative will be provided instructions concerning financial compliance. Additionally, the director should review the contract to determine the governing financial regulations under the terms of the award. This award notice will include an introduction to appropriate business and comptroller’s office staff who, during the course of the project, will work with the project director concerning financial matters.

Record Keeping/Retention

It is required under standard regulations, that all records pertinent to the overall performance under the terms of an award be maintained for review and documentation during the entire period of the award. These records include those necessary to document both programmatic and financial compliance. Generally all records that are pertinent to the grant must be held for a period of at least three (3) years after the date of acceptance of the final/closeout report from the sponsor. If any litigation, claims, negotiations, audits or other actions involving the records has been started before the expiration of the three (3) year period, the records must be retained until completion of the action and resolution of all issues which arise from it. There may be noted exceptions and the project director should refer to the appropriate award document for additional directives.

The project director should be fully cognizant of the record maintenance and retention requirements as stipulated under the award specifications and develop a record maintenance and retention plan to be utilized during the period of the award. The records of the project are the property of the University and should not be permanently removed for any reason. If the PI/PD leaves the University, all records shall be submitted to the department head or dean.

Publications

Publications that are the result of or and supported by sponsored agreements must be acknowledged according to sponsoring agency requirements.

NIH

- PubMed/PMCID/My NCBI
  Project supported by the NIH are required to submit publications through PubMed.gov. NIH award/contract number must be indicated within the publication. Additional information can be found at PubMed.gov. Anyone submitting an application, proposal or report to the NIH must include the PMC reference number (PMCID) when citing applicable papers that they author or that arise from their NIH
supported research.

Prior to expending funds under the award, the project director should be fully cognizant of the statutory and regulatory requirements and insure compliance in all areas.

**Post-Award Changes**

There are two types of post-award changes may require approval of the granting agency Programmatic Changes and Budget Changes. Programmatic Changes represent departures from approved project plans.

The following programmatic changes require prior approval of the granting agency:

- Changes to project’s scope, specific aims, or objectives;
- Changes in key personnel or a significant change in the level of effort of key personnel;
- Changes which transfer (through sub-granting or other means) financial assistance or substantive programmatic work to a third party;
- Providing medical care to individuals under research grants;
- Other changes that have been specifically stipulated in the award document.

Some budget changes require prior approval of the granting agency. They are as follows:

- Any revision requiring additional funding;
- Unless waived by the awarding agency, cumulative transfer among direct cost categories or among separately budgeted programs exceeding 10% of current total approved budget, whenever the awarding agency’s share exceeds $100,000;
- Transfer of amounts previously budgeted for student support (e.g. tuition waivers, stipends, training allowances);
  - Unless waived by the institution and awarding agency, transfer of amounts budgeted for indirect costs to absorb increased in
  - Unless waived by the awarding agency, creating new budget line items not approved in the grant agreement;
- Other revisions specifically stipulated in the award document.

External budget transfers should be accomplished in accordance with
guidelines of the funding agency and the University.

**Internal Budget Transfer/Modifications/Revisions**

**Budget Transfers/Modifications/Revisions**

Transfer of funds from one object class/budget line to another for allowable expenditures are permitted at the discretion of the PI/PD, when required to accomplish overall program objectives. Budget transfers, modifications and revisions are permissible if (1) all restrictions and/or guidelines of funding agencies are adhered to and (2) requests are made and appropriate approvals received. Budget modification must be requested utilizing the Budget Transfer Request Form.

**Multi-Year**

A Budget Modification and Revision Form must be executed to affect or expand transfer of budget funds between program/budget periods. Grant Directors must execute a new budget at the beginning of each program year.

**Changes in Grant/Budget Period**

Some awarding agencies delegate authority to the University to commit and expend funds for allowable costs in support of the project, up to the amount specified in the award letter, at any time during the grant/budget period. (Expanded authority – NIH). In most cases, however, prior agency approval is required to expend on carryover funding across program/budgeted periods.

The grant/budget period is the period of time between the effective date and the expiration date. The effective date of a grant or other agreement will not change unless the change is justified by exceptional circumstance. The expiration date may be changed as a result of approval of a request for Agency Approved (1) No-Cost Extension or (2) Supplemental Cost Extension.

A no-cost extension should be requested at least 60 days prior to the end of the project if additional time is required to assure adequate completion of the original scope of work with the funds already made available under the award document. The PI/PD is cautioned not to make new commitments or incur new expenditures after the expiration date in anticipation of a no-cost extension.
Supplemental Cost Extension

A supplemental cost extension may be requested if funds provided by a grant or other agreement are insufficient to complete the original scope of work.

A request for supplemental support should include:

- A brief justification of need; and
- A signed budget highlighting the use (by budget category) of the additional funding required.

Changes in the grant periods for no-cost extensions and supplemental cost extensions must be initiated by the PI/PD and transmitted to the ORSP. The request must be supported by a fully executed Budget Revision Form. This request must also be supported by a budget document reflecting funds approved and funds to be expended during the grant extension period. The ORSP will secure a cover letter signed by the authorized representative to transmit the extension request to the funding agency, or prepare request to be submitted electronically to the sponsor.

The terms used are to designate changes adopted by the funding agency, to delegate prior approval authority to the University, and to provide the University with the flexibility required to permit effective management of grants and other agreements. Currently, sponsoring agencies’ guidelines provide an opportunity for the University to make most prior approvals except the following:

- Changes in objectives or scope;
- Changes in Principal Investigator(s) or level of effort;
- Establishing relatedness of projects under the direction of collaborating PI;
- Contracting any significant part of the research or substantive effort; and
- Actions requiring additional federal funds.

The above list is not all-inclusive. In the event of uncertainty as to whether a particular change is significant enough to require prior approval of the sponsoring agency, the PI/PD should refer to the appropriate agency guidelines for clarification or contact the ORSP for final determination from the agency.
Documentation for each prior approval action by the PI/PD must reflect appropriate University reviews and approvals, which must be made in advance of the action. Funding agencies, from time to time will authorize the carryover of funds to complete the original scope of work as defined in the award. The restrictions and the amount of allowable carryover will vary, depending on the agency involved. Various funding agencies have pre-approved criteria that establish the amount and authorized period for which funds can be used.

The PI/PD is advised to refer to the guidelines of the sponsoring agency to determine if a pre-approved carryover regulation exists for their particular program. If on the Notice of Award an official request to carryover funds is needed, the PI/PD should work with the ORSP and the Comptroller’s Office to coordinate the submission of required documents. If a financial report is required to substantiate the amount of funds available for authorized carryover, the PI/PD should request the necessary information from the Office of Business and Finance.

Upon receipt of an approval to utilize carryover funds, ORSP will submit the necessary documents to Business and Finance to facilitate the use of funds. The following documents are required prior to expending funds:

- An approved carryover authorization from the funding agency;
- An approved budget reflecting the amount of the carryover authorization;

These documents must be submitted for approval through the appropriate university channels prior to expending any funds beyond the original budget period. All carryover funds authorized be used by the date specified in the carryover authorization. Pre-approved carryover funds should be used as soon as possible following the original expiration date.

**Matching/Cost-Sharing**

Dillard University receives funding from Federal, State, Local, and Private funding agencies. One of the criteria for the awarding of funds from the various sources may include matching funds and/or cost sharing requirements.

According to current NSF and NIH policies, Cost Sharing is not allowed in grant submissions, unless explicitly stipulated within the RFP/RFA. However, in the rare event that Cost-Sharing is required all Cost-Sharing must be clearly identifiable and accounted for, including in-kin contributions.
Cost sharing or matching is defined as the total project or program cost not borne by the federal government for federal programs or the awarding agency for all other programs. The amount and types of cost sharing may vary among agencies and are generally classified as follows:

- **Cash Contributions** - Cash contributions represent the recipient’s cash outlay, including the outlay of money contributed to the recipient by no-federal third parties.

- **In-Kind Contributions** - In-kind contributions represent the value of non-cash contributions provided by the recipient and non-federal third parties. Only when authorized by federal legislation, purchases with federal funds be considered as the recipient’s in-kind contributions. In-Kind contributions may be in the form of charges for real property, and the value of goods and services directly benefiting and specifically identifiable to the project or program.

Prior approval of university cost-sharing commitments with sponsored agreements must be obtained from the VP Business & Finance before submission to the funding agency. Detailed description of Dillard’s Cost Sharing Policy is contained within the Institutional Policy on cost sharing. (See Appendix)

**Closeout Procedures**

**Interim Reports**

Many agencies require annual, quarterly, or semi-annual technical progress and financial reports. The award document identifies the due dates of such reports. The ORSP typically can assist with questions about the format of progress reports. The progress report is usually required before the agency will award subsequent year(s) funding. Some agencies may not notify PIs when reports are due. Many multi-year grants/contracts have a formal application process for non-competing continuation, which includes the report and/or budget. PIs must remain aware of reporting requirements throughout the award period.

**Final Reports**

Almost all agencies require final technical reports. Award documents typically identify due dates of reports, usually **30 to 90 days** progress after the termination date of the project. For projects with Sub-awards, the University requires all final invoices must be submitted within 45 days after the termination date of the Sub-award or the grant/budget period, whichever
occurs first. Final progress or technical reports normally include: a summary of the progress made toward the goals stated in the proposal; a description of significant results; a list of publications or items resulting from work on the project; disclosure of patents or inventions resulting from the support or Financial Status Report (FSR) and the final financial status report.

**Patents/Commercialization**

PIs who believe that their research may lead to material which is eligible for a patent or copyright should discuss the matter with Business and Finance, the Office of Academic Affairs, and the ORSP as early as possible, for necessary technology transfer procedures. The Office of Legal Affairs currently processed old patent application requests.

**Financial Reports and Documentation**

The Office of Business and Finance has the overall responsibility for maintaining financial records for the grant, posting charges as they are incurred, and sending periodic budget reports to the PI. Business and Finance also invoices funding agencies/prime contractors for payments and corresponds along with the PAA to the funding agency related to fiscal affairs.

The Dillard University Grant Reporting Routing Form must be signed by the PI and the Assistant Vice President of ORSP, Area Vice President, Vice President of Institutional Advancement, (if an financial report is required), and the President. The programmatic report must also be attached. ORSP must receive document at least ten (10) days prior to due date of report. If a financial report is required the Senior Accountant (Gifts and Grants) must attach the report also.

**Grant Tracking System**

Dillard University grant tracking system files serve as the University’s official archive of all public and private awards. All grants are kept in a central location in the ORSP (Public), and Development (Private). Grant files are maintained in accordance with the University’s fiscal year. Pending grant applications (proposals) are to be maintained until funding notification is provided. Unsuccessful grant applications can be maintained for a period of one (1) year as reference.

Each grant category will be maintained according to particular characteristics. (Example: Public/Private/Pending/Current Fiscal Year/Funding Source)
Each grant file should contain the following:

1. Grant Agreement
2. Abstract
3. Budget
4. Narrative
5. Award Modifications- Change of Award (if applicable)
6. Extensions/ Budget Extensions (if applicable)
7. Progress Reports/ Status Reports
8. Final Reports
9. Financial Reports (if applicable)
10. Budget Revisions
11. Federal Notices/ Pertinent Materials/ Modifications

FREQUENTLY CALLED NUMBERS / POINTS OF CONTACT

- **Office of Academic Affairs:**
  504-816-4051
- **Office of Business and Finance: Comptroller**
  504-816-4050
- **Office of Research and Sponsored Programs:**
  504-816-4261

**Commonly Used Abbreviations**

- **ORSP** – Office of Research and Sponsored Programs
- **B&F** – Office of Business and Finance
- **AA** – Office of Academic Affairs
- **PI** -- Principal Investigator
- **PD** – Project Director
APPENDIXES
APPENDIX - I
DILLARD ORSP DOCUMENT AND GRANT ROUTING PROCESS
**POLICY FOR INTERNAL DOCUMENT ROUTING**

<table>
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**Reason for Policy/Purpose Update**

In an effort to streamline processes relative to award management the Division of Institutional Advancement (IA), in coordination with a number of other university offices utilize electronic signatures (e-signatures) to process a number of select documents and requests. The use of e-signatures is also intended to promote additional integrity in routing and approval processes, particularly where multiple signatures or approvals are required. IA recognizes the increased operational efficiency gained from conducting many transactions by computer, over the internet, and by e-mail. This policy is also intended to provide additional opportunities for IA and other areas to process requests and approvals more efficiently.

**Policy Statement**

IA currently utilizes the Adobe EchoSign, cloud-based program to prepare, route, track, and disseminate select documents and requests relative to externally supported projects and other IA processes. These include, but are not necessarily limited to Grant Routing Forms, Report Routing Forms, Budget Revision Requests, (4) Travel Requests, (5) Effort Reporting Documents (Time & Effort), and Personnel Action Forms (ePAF).

All e-signed documents and requests will be routed for approval via email and will be delivered for review and/or approval via users’ university-issued email address (____@dillard.edu).

**Who Needs to Know This Policy**

This policy is applicable to university employees who have responsibility for directing federally sponsored programs or transmitting, processing, or approving of particular documents or processes. This includes but may not be limited to the following:

1. Principal Investigators
2. Grant Directors
3. Departmental administrators and support staff
4. Faculty and Staff with all or part of their salary/effort charged to federal awards
5. Faculty and staff submitting application for external funding (private and government)
6. Approvers of IA documentation (routing forms, budget documents, effort reports, etc.)
**Policy/Procedures/Accountability**

Grant Directors, Principal Investigators, and other employees that are required to utilize and process IA forms/documents should contact the Office of Research and Sponsored Programs regarding necessary training and access to EchoSign. Individuals are responsible for activities conducted associated with their user ID, and are expected to take all precautions to safeguard passwords and other information to prevent unauthorized use.

Relative to records retention processes, records shall be retrievable and accessible in a timely manner throughout their retention period. Retention expectations for electronic records are the same as those for non-electronic records (See Record Keeping/Retention). Therefore, project directors and investigators should periodically export and maintain electronic files to ensure access throughout the retention period.

**Website Address(es) for this Policy**

http://www.dillard.edu/_administration/_institutional-advancement/research-and-sponsored-programs/index.php

**Contact(s)**

Office of Research and Sponsored Programs
Office of Information Technology

**Who Approved this Policy**

**History/Revision Dates**

Origination Date:
Cabinet Approval Date:
Updated:
Revised:

**Agreement - Signature**
Appendix - II
Policies & Procedures on Cost Sharing
POLICY ON COST SHARING

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**Reason for Policy/Purpose Update**

As a recipient of federal awards, the University must maintain a policy on cost sharing on federal awards. The policy and procedures must be in accordance with OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Sections 2 CFR 215.23(a)(5), 200.29, & 200.306

**Policy Statement**

As a recipient of federal funding Dillard University is required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), as well as other federal requirements for certifying effort expended on sponsored agreements and awards. As such, Dillard University requires all to comply with federal and University policies regarding reporting effort on such awards.

Personnel charges to federal awards should be reflective of effort committed by faculty and staff toward the award(s). Faculty and staff are responsible for ensuring that effort charged to federal agreements are a reasonable representation of the actual effort they provided on the award.

**Who Needs to Know This Policy**

All faculty and staff with all or a portion of support from federally sponsored agreements, as well as all individuals involved with administration and conduct of federally sponsored award activities, including principal investigators (PI) and other research personnel, and central and departmental budget/program managers. It is the responsibility of the PI or designated department level manager to remain cognizant of university commitments and agency requirements regarding cost sharing.

**Definitions**
Cost sharing denotes expenses directly related to a sponsored project but not paid for with agency funding. Cost sharing can be institutional paid expenses, such as salary and fringe benefits, equipment, unrecovered F&A costs, and other related expenses. Unrecovered F&A costs may be included as part of cost sharing or matching only with the prior approval of the awarding agency. Cost sharing can also be provided through contributions from sources outside the University or the agency. Cost sharing toward federally sponsored projects generally cannot include "contributions from any other federally-assisted project or program. The costs must be necessary and reasonable and directly related to the proper and efficient accomplishment of project or program objectives. These costs must be allowable under the applicable federal guidelines. Cost sharing should be proposed if the agency requires it as a condition of application, or cost sharing is necessary to ensure competitiveness of the proposal.

### Policy/Procedures/Accountability

Cost sharing should be clearly established within the proposal’s budget and budget narrative, in that the University must document all costs relating to the project and report those cost to the agency. When cost sharing is included in the proposal and the project is subsequently funded, the cost sharing is considered mandatory and must be documented. If the proposal was awarded with cost sharing in the proposal, the Principal Investigator must obtain the agency’s approval to change the amount of cost sharing committed to the project.

**Cost Sharing Project Codes**

Sponsored projects that require or include cost sharing must have project codes established within the institution’s accounting system. The investigator should request a project code prior to submission of the proposal/application for a sponsored project. However, this code must be established prior to the final contract/grant agreement approval or the committal of university resources. The establishment of project codes with each sponsored project allows for more effective tracking and reporting of cost sharing provided throughout the life of the project.

Investigators submitting requests for sponsored projects that require project codes, must indicate the source and level of cost share on the “Grant Routing Form”, and acquire approval (via processing of the routing form) of the responsible department lead and other designated University administrators prior submission to the agency.

**Documenting Cost Sharing**

Cost sharing committed by Dillard will be identified and documented at the time the Grant Routing Form is completed. The Principal Investigator must identify from which university cost center (s) sharing is being provided.

Third Party or in-kind cost sharing will be documented with a letter from the party contributing the cost sharing, to be obtained by the Principal Investigator. The letter should be on professional letterhead and should be signed by an official from the organization contributing the cost sharing.
The contributed expenses should be listed and should be actual costs. Property, space, or equipment etc., should be recorded at current fair-market value.

Investigators should consult with the Offices of Sponsored Programs and Business and Finance when submitting a government-sponsored request that requires or will involve cost sharing. It is the responsibility of the investigator to ensure that all necessary approvals are obtained prior to committal of University funds or resources.

**Website Address(es) for this Policy**
www.dillard.edu/orsp

**Contact(s)**
DU ORSP

**Who Approved this Policy**

**History/Revision Dates**
Origination Date:
Cabinet Approval Date:
Updated:
Revised:

**Agreement - Signature**
Appendix - III
Policy and Procedures on Effort Reporting
# Policy on Effort Certification

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**Reason for Policy/Purpose Update**

The following information details the University’s policy and procedures for maintaining appropriate Time and Effort documentation, as required Uniform Guidance Subpart E 200.430. The revised policy outlines processes for all exempt employees that are either compensated from or have portions or all of their salary charged to sponsored agreements.

## Policy Statement

As a recipient of federal funding, Dillard University is required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), as well as other federal requirements for certifying effort expended on sponsored agreements and awards. As such, Dillard University requires all to comply with federal and University policies regarding reporting effort on such awards.

Personnel charges to federal awards should be reflective of effort committed by faculty and staff toward the award(s). Faculty and staff are responsible for ensuring that effort charged to federal agreements are a reasonable representation of the actual effort they provided on the award.

## Who Needs to Know This Policy

All faculty and staff with all or a portion of support from federally sponsored agreements, as well as all individuals involved with administration and conduct of federally sponsored award activities, including principal investigators (PI) and other research personnel, and central and departmental budget/program managers. It is the responsibility of the PI or designated department level manager to communicate to the sponsored programs office (ORSP) any change in effort that require sponsor notification and/or approval. The PI is also responsible for ensuring that Effort Certification Documents for their awards are completed and returned to ORSP.

## Definitions
Effort Reporting Requirements
As a recipient of federal contract and grant funds, Dillard is responsible for maintaining an effort reporting system in compliance with the requirements of Uniform Guidance. The University must maintain an Effort Reporting System that assures salaries and wages charged to sponsored research awards accurately reflect the time devoted to the project for a specific period. This system must document all effort, whether treated as direct or F&A, for sponsored agreements. Exempt employees are responsible for understanding how their salary charges are distributed and should verify there is a reasonably close relationship between salary distribution and the actual effort devoted to the projects being charged.

University Method for Effort Reporting

After The Fact Reporting
Dillard employs the “After the Fact” method. Under this method, the distribution of salaries and wages of staff applicable to sponsored agreements is based on budgeted work activity, updated to reflect any significant changes in work distribution. At least annually, a statement will be signed by the employee, principal investigator, or responsible supervising official(s), using suitable means of verification that the work was performed. Since Effort Certification Documents (ECDs) are the source documents that support salary charges to sponsored projects, it is essential that data are based on reasonable and accurate estimates of actual effort expended on sponsored projects (both as direct and cost-shared or indirect charges) and other effort reporting categories.

Effort Certification System and Procedures
For faculty (with 9-month appointments) an Effort Certification Document (ECD) will be required semi-annually encompassing each academic term that involves salary and/or effort on sponsored project(s) and should include the signature of the employee, supervisor and/or principal investigator.
For exempt staff, ECDs will be required quarterly denoting effort on all sponsored agreements and must include the signature of the employee, applicable supervisor, and the area vice president. Non-exempt employees’ effort will be certified within monthly/bi-weekly timesheets or payroll documents.

It is the responsibility of the employee and principal investigator/immediate supervisor to ensure timely submission of time and effort certifications. Timely submission of the certification is essential, in that these certifications must be reconciled with actual salary allocations. Signed ECD’s are due to the Office of Research and Sponsored Programs (ORSP) within 15 days after ECDs have been forwarded/released by ORSP or within 15 days after the reporting period, whichever occurs first. They should be complete with all necessary approvals and transmitted electronically to ORSP (See ORSP for detailed procedures and e-routing processes).

For the purpose of the Effort Reporting System, the certification periods and subsequent ECD reporting dates are as follows.
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**Major Effort Distribution**

Federal statute requires that notification is provided to the funding agency when PI effort toward the sponsored project is reduced or changed by 25%. This may be necessitated by involvement in additional awards or University activities. However, the level of total effort reported from all activity should not exceed 100%. All changes must be certified by the employee and someone who has suitable means to verify the effort expended or work performed. In the event that this becomes necessary, PIs should contact the Office of Research and Sponsored Programs prior to contacting the funding agency.

**Departure from The Institution**

Upon departure from the university, all employees with effort charged to federally sponsored agreements must complete a final Effort Report Document reflective of the efforts during the current reporting period. This certification must be completed during employee’s exit / clearance process through Human Resources. The final ECD must be also signed by the PI or immediate supervisor. In the event the ECD cannot be completed prior to the employee’s departure the effort must be certified by the PI or immediate supervisor and provide explanation (i.e. illness) for exiting employee not signing.

**Website Address(es) for this Policy**

www.dillard.edu/orsp

**Contact(s)**

DU ORSP
Appendix - IV
Policy for Allocation of Recovered Indirect Cost (IDC) From Externally Funded Awards