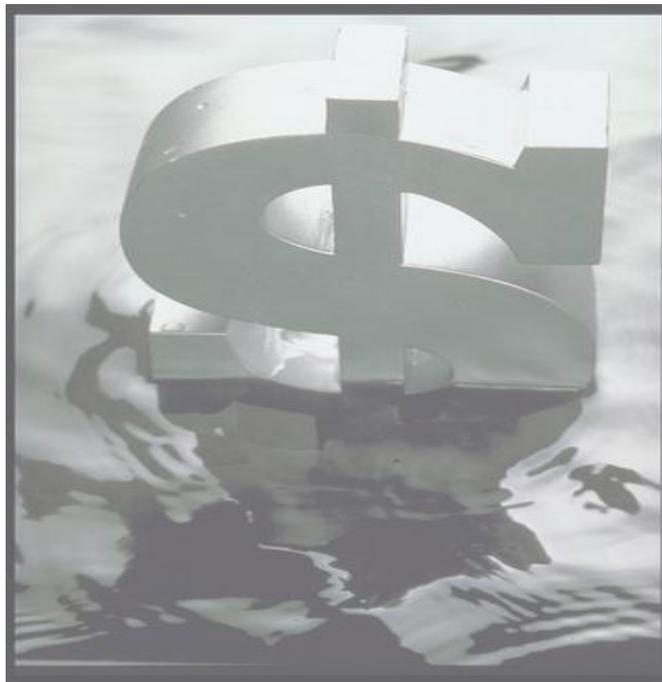


THE FUNDING SUCCESS HANDBOOK

Proposal Initiation, Development, and Administration at

California State University, Stanislaus



The Funding Success Handbook

OFFICE OF RESEARCH AND SPONSORED PROGRAMS

The Funding Success Handbook

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Identifying Funding Needs & Opportunities

General

California State University, Stanislaus (CSU Stanislaus) strives to support grants and contracts in order to do the following:

- Assist faculty in obtaining external funding to support their creative and scholarly activities;
- Advance the University's research, instruction, and public service missions; and
- Provide administrative support to advance the creative research with external organizations.

To attain these goals, the University has both Pre-Award and Post-Award functions designed to create seamless development, implementation, and closure of all externally funded projects.

Sponsored Programs provide significant benefit to the California State University (CSU) and further its educational mission by facilitating research, workshops, conferences, institutes, and other projects that enrich the scholarly endeavors of faculty and students, and enhance the services provided by the University to California communities. The policies and procedures in this document, in accordance with Executive Order No. 890 (hereafter referred to as EO 890), ensure that the benefits of Sponsored Programs are maximized and support faculty, students, and administrators in effectively securing and carrying out Sponsored Programs.

For all grants and contracts, CSU Stanislaus shall serve as the applicant agency and the fiscal agent in the administration of grants and contracts. In some cases where a 501(c)(3) designation is required, the Auxiliary may serve as the applicant and fiscal agent. In *all* cases, the Provost's signature, as the Authorized Institutional Representative, is required on all grants and/or contracts prior to submission. The University, in conjunction with the Principal Investigator (PI), is legally responsible and accountable to the sponsor for the use of funds provided and the performance of the sponsored program (EO 890, 3.2.1).

Discovering the Types of Funding Needs

Before the grant writing process begins, it is important to identify the type of project in order to assist in the resource investigation. Funding agencies and foundations have their own reasons for preferring one type of project over another. There are generally five types of proposals.

- 1. Program:** Grants that help the University provide services to the community are called program proposals. This can also include non-instructional programs established to respond to a community need or solving a community program.
- 2. Research:** These are grants to study a particular issue. Research outcomes might include the creation of knowledge, the organization of knowledge, the application of knowledge and creative activities. (Instructional activities such as workshops, short courses, and training grants, should not be classified within the Research program, but should be classified as part of Instruction.)
- 3. Instruction:** These are grants that are for the expressed purpose of eliciting some educational change. "Educational change" includes the following criteria:
 - The acquisition or improved understanding of some portion of a body of knowledge
 - The adoption of new or different attitudes
 - The acquisition or increased mastery of a skill or set of skills (both teaching and facilitating fall into this category)
- 4. Student Services:** Student Service funding opportunities generally fall under the following categories:
 - Expanding students' educational and social development by providing cultural, social, and athletic experiences
 - Providing those services and conveniences needed by students as members of an on-campus, resident student body
 - Assisting students in dealing with personal problems and relationships, as well as their transition from student to member of the labor force
 - Administering a program of financial support for students
 - Recruiting and admitting students to the institution's educational program
- 5. Scholarships/Fellowships/Financial Aid:** Financial assistance provided to students or faculty in the form of grants, stipends, and prizes awarded. Included in this category are tuition and fee waivers, as well as gifts and prizes that are not contingent upon the students rendering services to the institution.

Funding Research and Data Gathering

The Office of Research and Sponsored Programs (ORSP) provides services to the University community in identifying funding opportunities. ORSP subscribes to grant search engines available on the website (<http://web.csustan.edu/ORSP/>), and Grants and Contracts Specialists in the office also offer custom tailored searches. Institutional data needed to identify a compelling need for a grant may be obtained from a separate

University entity, the Office of Institutional Research. ORSP can assist in compiling data and research narratives to support research initiatives.

Concept Development

Faculty are encouraged to engage in appropriate outside professional and research activities. *However, the University must approve the submission of a grant or contract proposal. The University's routing procedure detailed on p. 20 is the official approval process.* Space and facilities to perform research or contractual activities can be assigned provided it is without detriment to the regular instructional responsibilities of the University. In such cases, a written explanation of the approval shall be included in the project file as a matter of record. An individual who proposes a grant or contract must be a University employee, must personally participate to a significant degree in the project, and is responsible for its execution in accordance with University policies and funding agency regulations. With this in mind, it is important for the PI to know that solicitation authority for extramural support of projects can only officially be made by the Authorized Institutional Representative. This is so even when considering funding opportunities available through a private source or foundation.

Establishing the need for a research project is critical to the funding process. Needs documentation is the process of finding evidence that there is a need for the project. One of the prime ways in which a grant writer can be unsuccessful is to provide inadequate documentation of the need. The following are examples of establishing need.

Review of Public Records: Many public agencies gather data that can assist the grant writer in building a case of need.

Literature Search: Reputable published documents are an important part of establishing needs, methodologies, and needed programs/outcomes. Many federal government entities, such as the National Science Foundation, weigh this aspect of the grant proposal very heavily.

Evidence of Demand: Project specific information, such as long waiting lists for proposed programs.

Case Studies: This can be an in-depth profile of one person in the client population or a series of case studies of different individuals woven together. It is important to note that this type of need development is not sufficient in and of itself. Rather, combined with other types of needs assessment, it strengthens the case being built.

Survey: An analysis of the client population based upon statistically significant random selection can be very powerful.

Public Hearing: This can paint a picture of the needs of the client population and show a broad base of support for the proposed efforts. It also can reflect the ability of the grant writer to seek community input into the program.

Letters of Support: These should be written by individuals who are very knowledgeable about the issue being faced. They may be elected officials, experts, or people in the client population.

Steps in Developing a Proposal

Anatomy of a Proposal

If the sponsoring agency does not provide specific instructions for what should be included in a proposal, the following guide may be helpful. However, when guidelines are available, read them carefully and follow them precisely. As quoted by a Program Officer at the National Endowment for the Humanities, “READ DIRECTIONS, READ DIRECTIONS, READ DIRECTIONS!”

Heading	Contents	Alternative Heading
Title Page	Name of organization applying for funding, contact information for the PI (address, phone number, fax and email), name of the agency to which proposal is submitted, project title (<i>keep it short and descriptive</i>), dates of the project period, total amount of funds requested, signature of authorized official(s) (Authorized Institutional Representative).	Cover Sheet Application Form
Table of Contents	Listing of proposal sections with page number references (include a listing of the attachments). Some federal agencies provide their own forms for this page, but even if one is not provided, the table of contents is helpful so reviewers can easily find the relevant parts of the proposal.	Contents
Abstract	Usually no more than one page. The abstract is a summary, not an introduction. Include a sentence or two about each of the principal aspects of the project: the problem to be solved, objectives, methods, expected results, and major budget items. The sponsor may specify the length of the abstract. “It should be a self-contained description of the activity that would result if the proposal were funded. It should be informative to other persons working in the same or related fields, and insofar as possible, understandable to a scientifically or technically literate lay reader” (NSF Grant Proposal Guide).	Project Description Executive Summary Summary

Introduction	An introduction is usually needed to give background information on the nature and importance of the problem to be solved. Why is the problem important and what is its history? The introduction is particularly important for non-specialist reviewers. It can range in length from only a paragraph to several pages, depending on the situation.	Background of the Problem Theory
Needs Statement	The need or rationale for the project must be established. Explain what is incorrect or absent in current theory or practice in your field in terms that match a particular sponsor's interests and that justify your choice of method or activity. For example, the problem to be addressed might be an important hypothesis not yet tested, a creative approach not yet tried, a population not yet served, or a source of valuable data not yet explored. Think about social or academic needs the sponsor is trying to address by offering grants, and direct your proposal to those needs. This section of text may be included in the introduction, or it may be a separate section.	Purpose Questions to be Addressed Problem Statement Hypothesis/es to be Tested
Goals and Objectives	The objectives of the project need to be stated clearly, whether in a separately labeled section or as part of a general narrative. For a multi-year project, it may be appropriate to distinguish between broad long-term goals and specific objectives for the first year or two. Pay close attention to the sponsor's interests and goals, and express your objectives in terms and contexts that are appropriate to the sponsor.	Solutions Expected Outcomes
Project Plan	<p>The methods or activities you will use to accomplish the project objectives may be described in a separate section or as part of a broader descriptive section. A common reason reviewers decline proposals is that the PI does not explain with enough clarity how he/she will actually accomplish the objectives.</p> <p>Describe the methods as fully as possible within the space limitations. For example, specify the following:</p> <ol style="list-style-type: none"> 1) how concepts will be defined operationally, 2) how variables will be measured, 3) what hypotheses will be tested or inquiries will be conducted, and 4) what equipment will be used. <p>For many projects, it is important to describe follow-up activities that will continue after the funded project period. If you are using funds to start a new program, how will it be supported in the future? If you are using funds to generate useful educational materials, how will they be distributed? Show that you have thought through possible continuing activity.</p> <p>Try to anticipate the reviewer's questions about your intended activities. Is all the necessary equipment available to you? Do you have assurance of access to facilities, records, or persons that are needed for the work? Have you considered alternative interpretations of the data? Have you justified unusual procedures? It also beneficial to have another person review your experimental design and validate it prior to submission.</p>	Strategies Action Plan Methodologies Operating Plan Activities Proposed Statistical/ Numerical Methods

Evaluation	<p>After the project is completed, how will you know that you have accomplished the stated objectives? Will the accomplishments and remaining problems be identified clearly enough for future workers in the same field? Evaluations can range from informal observations to elaborate experimental designs. You may be asked to use an outside evaluator, someone not in your institution and not already part of the project. Be sure you know what evaluation the sponsor expects and demonstrate your ability to meet that expectation. Standard accepted methods can be referred to by name, but unfamiliar or controversial methods should be explained and justified. Make clear that these methods are appropriate for your project. Reviewers who are expert in your area of work will read this section closely, so be sure it is complete.</p>	Summative and Formative Evaluation Assessment of Outcomes
Dissemination	<p>Explain how the project results will be made available to others. This may take the form of publications in professional journals, presentations at national/regional meetings, or technical reports. If the project is applicable elsewhere and it is appropriate to include a plan of pilot implementation, be sure to describe this as part of the project plan and make appropriate allowances in the budget.</p>	Distribution of Results Transferability Replicability Utilization Plan Target Publications Anticipated Products
Responsibilities of Key Personnel	<p>Responsibilities of project personnel may have to be detailed if there are numerous investigators or managers in the project. It is advisable to outline what each person will do. Also, include significant subcontractors in this section. One or two sentences for each are usually enough. For large projects, an organizational chart may be appropriate. For projects that are small or in which the lead responsibilities are fairly obvious (e.g., a lab scientist and several technicians), an organizational chart is usually unnecessary. When two or more investigators will be sharing the work equally, it is customary to designate one person as the Principal Investigator for such purposes as signing application forms and approving financial transactions during the project. Similar to the timeline and the budget, this section gives reviewers another perspective on how well you have thought through the work you are proposing.</p> <p>Include résumé or curriculum vitae as requested or necessary.</p>	
Equipment and Facilities	<p>Describe what facilities are available to you, how they will help you achieve your project objectives, and their appropriateness to your project. If you plan to use your existing university office with some clerical assistance, not much description is needed. For complex laboratory work or projects involving major campus facilities, several paragraphs may be required.</p>	Resources Space and Equipment Requirements

<p>Timeline</p>	<p>A timeline or work schedule is generally advisable. By tying the steps in your method to a schedule, a timeline is a useful way for you to check your own planning and for proposal reviewers to picture your project development. A schedule that is implausible for the work being proposed will be seen as a serious flaw in the proposal. Including a timeline can preclude misunderstandings that might occur later in the course of the actual project. In setting the start date for the project, remember to allow ample time for the review process, award determination, and possible negotiations (6-9 months).</p>	<p>Schedule</p>
<p>Sources of Funding</p>	<p>Other funding for the project should be specified in most cases. If the proposed work or related work is, or has been, supported from other sources, or if you have definite plans for seeking such support, communicate that information in the proposal. This information serves several purposes. First, it helps the sponsor understand the project in a larger administrative or intellectual context. Second, evidence of past support shows the sponsor that you have established credibility and rapport with other sponsors. Third, sponsors may want reassurance that you are active in pursuing other means of support so they will not be held responsible for all costs or be saddled with an incomplete project. This would include matching funds and/or an in kind match from the University. Many sponsors provide separate forms for listing recent and planned support. If your sponsor does not, then you may wish to create a special page or make appropriate references in the narrative text.</p>	
<p>Budget</p>	<p>A budget is always necessary, and a narrative explaining any special aspects of the budget is often required. Because the budget is so important to a proposal, it is considered at length in a separate section of this handbook.</p>	<p>Fiscal Requirements Project Costs Financial Resources</p>
<p>Appendices</p>	<p>For information on examples of supporting documentation, see Chapter 1, Identifying Funding Needs and Opportunities; Concept Development. Sponsors may require specific attachments. Always submit every required document. Some sponsors, especially government agencies, might require legal certifications. However, use caution and good judgment. Do not expect attachments to make the main points of the proposal. Know what kinds of attachments the sponsor expects to receive and do not send anything else. Do not overload the proposal with attachments.</p> <p>A bibliography is necessary for many academic proposals. Ensure that your literature review is up to date. Also, certify that the style and format of citations are conventional for your discipline and used consistently throughout, and that references cited in the text are included in the bibliography.</p>	<p>Attachments Background Materials Supporting Documents</p>

Measures of Funding Effectiveness

- 1. Severity of Need:** It is important to show that the community needs the proposed program. However, it is also important to demonstrate that the need is more severe, in quantifiable terms, than the need of other communities competing for the funding. The funding agency will have to defend their decision to all the applicants that were denied, so be sure to clearly emphasize the community need.
- 2. Shared Mission:** Every funding agency and private foundation has a mission statement. For a public sector agency, this mission statement is often found in the enabling legislation that established the grant program. For a private foundation, its charter often lays out the goals of the organization. Does the grant proposal help the funding agency further its goals? If not, look for another source of funding.
- 3. Competitiveness:** Keep it simple and precise. The proposal should be able to be summed up succinctly. Government grants in particular include a scoring sheet that the reviewer will use to score the application. Self-evaluate the proposal and invite trusted colleagues to do the same for valuable feedback. Other indications of competitiveness include the following: Is the dollar amount requested within the average range of the awards given out in the previous year? Is the proposal for a project typically funded by the agency? Be sure to investigate previously funded projects when preparing applications to private funding agencies. If there are other very similar projects funded, reconsider finding an alternative funding source.
- 4. Consistency:** Is the application logical from start to finish? Are there gaps where a problem was outlined but no solution provided? Many funding agencies will want to know plans for how the project will be self-sustaining beyond the time frame of the grant. What additional funding plans lie ahead? What are the long-reaching effects of this program? How might it be generalized to help other communities? These may be important issues to address.
- 5. Competence:** In addition to the application, the University will also be assessed. The funding agency will want to know that if the money is awarded, the project will see a successful completion. Many people submitting grant applications include a separate capability statement as an attachment to the application. This is a brief overview of the University, the projects that have been undertaken, and any awards or accreditations that have been received.
- 6. Understanding the Problem and Solution:** Show that the problem is understood and documented. The application must outline a service method that addresses the problem documented. The solution proposed must be consistent with the currently accepted ideas or methods in the field. If outdated terminology or techniques are used, the application will be quickly discounted. According to Program Directors in the National Science Foundation, 25% of time should be spent outlining the problem and 75% of time should be spent outlining a clear-cut solution. These proportions may vary. However, if the proposal spends most of the time discussing the problem and the solution is unclear, imprecise, or hazy, finding funding for the project will be difficult.
- 7. Accountability:** Funding agencies typically prefer applications that have detailed timetables with milestones clearly identified. If funded, they will want to measure the progress. As an

example, if the proposal originally stated that clients would be evaluated for the new program after three months, but an evaluator has not been hired or identified, it can indicate a problem with the program. The funding agency may want to step in with some advice, close monitoring, or, in the worst case, discontinue funding.

- 8. Realistic Goals and Budget:** Promise only what can be delivered. If awarded the grant, the application will become the basis for a contract with the funding agency. Be sure to work with ORSP to determine appropriate and 'red flag' expenditures. Many times, contact with the relevant Program Officer at the funding agency can help navigate the process by taking a look at a draft budget and providing feedback.

Budget Preparation

The budget is one of the most important parts of the proposal because the funding agency understands that the project's success depends on how well the major resources necessary to ensure completion of the objectives have been identified and accounted for. Items most often included in a budget are: personnel, fringe benefits, consultants, contractual services, travel, supplies and materials, equipment, and indirect costs.

CSU Stanislaus is the applicant agency and also serves as the fiscal agent.

The budget should be as realistic and accurate as possible. State policy is that departments recover full costs whenever goods or services are provided for other entities outside of the University. Cost allocation plans for the reimbursement of facilities, goods, and services provided by the campus to outside organizations must be in place, monitored, and documented. With this in mind, the budget should show that the costs are clearly related to the goals of the project.

A budget normally has a numerical section with dollar amounts for each category of spending, followed by a budget narrative section in which the items are explained in further detail including necessity and calculation method. This information helps reviewers understand the project and simplifies later discussions with the sponsor's staff on why certain amounts were requested for various tasks. Large or unusual items (such as international travel, consultants, expensive equipment, subcontractors, or construction costs) should be explained. Routine or small items may not need explanation. For match funding or cost sharing, indicate the source of the contribution. Note: Matching funds will be expended before grant funds. Any remaining balances at the completion of the grant will be returned to the funding agency.

Completion of the Proposal Review and Routing Procedures (p. 20) indicates that the University has certified the project/proposal for submission. ORSP, under the Authorized Institutional Representative, has full authority to (1) commit the University to make an offer of services; (2) negotiate and accept terms and conditions of an award (i.e., letters of acceptance, contracts, and first and second tier sub-recipient agreements); (3) authorize subsequent changes to existing agreements; and (4) ensure that the University meets its reporting obligations to quality and timeliness to the funding agencies (EO 890, 3.5.1).

Direct Costs

All externally funded projects have two general types of costs associated with them. The first type of costs is “direct costs.” These are the expenses incurred in the routine or day-to-day operations of the project. These costs are directly and uniquely associated with the project. For example, purchasing supplies for an experiment, paying mileage for travel to present research findings, or buying a computer to track attendance and participation of people in an innovative education program are direct costs. Direct costs are detailed in the budget section of the proposal and typically can be categorized as Personnel, Benefits, Equipment, Supplies or Materials, Travel, Contractual Services, or Student Stipends. Every dollar spent as a direct cost to a project must be documented and is subject to audit.

Allowable vs. Unallowable Costs

The Federal Office of Management and Budget (OMB) publishes Circular A-21, *Cost Principles for Educational Institutions* (http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html), the basic guiding document for federal grants. Costs are not considered allowable under a federal grant unless they are:

- Necessary and reasonable to the grant project,
- In compliance with the limitations of a grant agreement,
- Allocated to the grant on a basis consistent with policies that apply to all activities of the grantee,
- Accounted for consistently and in accordance with generally accepted accounting principles, and
- Not previously allocated to or included in the cost of any other federally funded program.

Because Circular A-21 does not identify every potential allowed cost, some interpretation may be necessary. However, certain types of costs are specifically not allowed. These include most advertising (except for recruitment or procurement), bad debts, contingencies, entertainment, fines and penalties, interest, and losses on agreements.

Faculty

Many extramural funding efforts require the dedicated attention of CSU Stanislaus faculty. When a faculty member’s time is reassigned to work on an extramurally-funded project, the department must either pay someone else to accomplish the tasks the faculty member would have done, or defer or drop the tasks. Typically, faculty members request reassigned time from some portion of their teaching responsibilities and the department hires visiting lecturers to teach the class(es).

The University shall be the employer of the PI and other employees with regard to work performed in furtherance of each sponsored program. In the case where the incumbent PI resigns, fails, or refuses to perform duties adequately, the PI’s responsibilities may be reassigned. Institutional procedures for assessing these circumstances and any affiliated administrative action are detailed in EO 890, 3.3.1.1. Should problems fall within the scope of existing campus policies for the conduct of research, CSU Stanislaus shall follow the appropriate research policy and procedures (e.g., research misconduct, human subjects research, animal welfare, conflict of interest, and intellectual property) (EO 890, 3.3.2).

Faculty Salary

A faculty member's salary is determined by his or her employment contract and rate of pay as reported by the University payroll office. Weighted Teaching Unit (WTU) buyout/reassigned time, additional employment paid as Special Consultants, or summer pay are the ways in which faculty are reimbursed for their funded scholarly work.

WTU BUYOUT/REASSIGNED TIME

Typically, the annual faculty salary reflects approximately 174 days of employment over an academic year. The PI preparing a project proposal should examine the project needs and consult with the relevant department chairs before determining the specified WTUs to be reassigned for the project. This portion of the faculty member's academic year salary, plus benefits, should be budgeted into the proposal. WTU rate is calculated at the faculty member's annual salary or 30 contracted units. Faculty preparing a proposal for external funding should contact ORSP to determine exact costs of reassigned time.

PIs should take note of the time and effort reporting requirements for their time dedicated to the project. For example, one (1) WTU equals approximately 8 days of work. Therefore, if a faculty member is being released from three (3) WTUs, then their time and effort report should reflect approximately 24 days of work dedicated to the project.

FACULTY ADDITIONAL EMPLOYMENT

Additional employment through grants and contracts is subject to the University's additional employment and overload policies, and the Unit 3 Collective Bargaining Agreement Articles 35 and 36, "Outside Employment" and "Additional Employment," respectively (EO 890, 3.3.3). Full-time faculty employees of the University who are working on a sponsored project cannot be paid overload or special consultant fees without the prior written approval of both the sponsor and the University. Federal Agencies do not permit overload pay during the faculty contractual year. A faculty member working 100% on any federally funded grant cannot receive additional compensation in overload/consultant fees on another federally funded grant, including the writing and submission for future grants. ORSP will advise applicants of any special guidelines related to these agencies.

For proposals that do not prohibit overload during the academic year, the University follows EO 890, 3.3.3. According to guidelines established by the Chancellor's Office, this means that reimbursement for additional employment cannot exceed 125% of the approved workload for faculty. This additional work is permissible only under the following conditions: a) the work being performed is of a substantially different nature from the person's normal employment; and b) is funded from non-general fund sources. Faculty are allowed to work 42-45 days of additional employment at an average daily rate to be calculated by ORSP. ORSP contacts the Office of Faculty Affairs to determine the exact rate and allowable days, according to University guidelines. Days outside the academic year (during summer months) do not count against the allowable days.

FACULTY ADDITIONAL EMPLOYMENT/SUMMER PAY

For work occurring during summer months (not covered during the contractual academic term), contact ORSP to determine the exact rate of pay. ORSP will coordinate exact rates from the Office of Faculty Affairs.

RETIRED FACULTY AND FERP FACULTY

Retired faculty can be paid up to 960 hours (50%) in a fiscal year as special consultants, calculated at a daily rate. Therefore, retired faculty can be paid for up to 120 (8-hour) special consultant days in a fiscal year.

Faculty Early Retirement Program (FERP) faculty cannot exceed 50% employment, including their teaching assignment. Therefore, if a FERP faculty member is teaching at a 50% workload, then they cannot work additional days on grants or contracts. If the faculty member is teaching at a workload that is less than 50%, then he/she can work additional days as a special consultant, as long as they do not exceed 50% employment.

Salary Savings

In cases where there is salary savings resulting from the difference between the replacement costs of the faculty member's reassigned time and the actual cost, the University will determine the appropriate allocation of the remaining resources.

Faculty and Employee Benefits

All employees at CSU Stanislaus receive benefits. Benefit costs, which are updated annually, are calculated at the rates indicated in the following table:

Effective 5/26/09*	MANDATORY DEDUCTIONS					PERS Retirement	Health/Dental/ Vision	Average to be Used
	Social Security (FICA)	Medicare	Workman's Comp	Labor Contracted Extended Leave				
<i>Percent</i>	6.2	1.45	2.0	1.0	18.00	Averages Academic Affairs		
Faculty Released Time & MPP	√	√	√	√	√	15.0	43.65	
Staff - F/T (50% + position)	√	√	√	√	√	28.0	56.65	
Staff - P/T (less than 50% position)	√	√	√	√			10.65	
Current Faculty-Special Consultant		√	√	√			4.45	
FERP Faculty		√	√	√		\$109.56 (annually)	4.45+\$109.56	
Retired Faculty		√	√	√			4.45	
Students		√	√	√			4.45	
CSU CalPERS active members		√	√	√	√		22.45	

*Before calculating benefits, contact ORSP at 667-3493 to verify current rates.

Other Personnel, Salaries, and Wages

Compensation for personnel is an area covered by many regulations due to potential problems with taxes, conflicts of interest, and fringe benefits. The following sections cover only the most frequently encountered questions, so please check with ORSP in advance with any particular questions about your own project budget.

The following notes on personnel costs refer to those who will be paid as employees of the University. If a substantial portion of the work is to be done by employees of another organization, then that work might better be handled as a subcontract. See the sections below on consultants and subcontracts.

Student Assistants or Work Study Students

Employing students to assist with a funded project is encouraged because of the work experience and income it provides students on our campus. Students are permitted to work on campus no more than 20 hours per week during the academic year when classes are in session (refer to academic calendar). The maximum hourly rate for a student assistant is \$17.26. Typically, \$10.00 per hour is budgeted for undergraduate students and \$15.00 per hour for graduate students. Forms to start the process of hiring student assistants and work-study students are available online at the Human Resources (HR) website under "Forms & Publications\Student Employment".

Salaries and Job Descriptions for Other Staff

Individuals hired for a project must be hired and paid according to standard CSU policies and procedures. These restrictions apply to all grant-related employees. HR assists with the hiring of all grant employees. For further information on University hiring practices, refer to Chapter 3, Sponsored Project Start-up.

Independent Contractors

It is often necessary to subcontract for work that cannot readily be done by CSU Stanislaus faculty or staff. Such arrangements can range from a simple agreement for the services of one individual to an elaborate arrangement between two institutions. These services can be listed as "Other Costs" rather than as "Personnel," and they are paid through purchasing, not through the campus payroll department.

Because institutions do not pay the same rate of government taxes for a contractor as they do for an employee, government regulators and auditors pay great attention to defining the appropriate use of contractors. If a contractor is to play an important role in the project, it helps to specify the name of that person and the work that will be done within the state of California. Include a resume or vita with the proposal.

Remember that CSU faculty and staff cannot be paid as contractors, only as employees. The University does not pay University employees for services as contractors. For assistance or additional information, contact HR at 209-667-3351.

Salary Increases for Future Years

If the grant period extends over more than one fiscal year, or starts in a future fiscal year, remember to include salary increases for future pay periods. If the pay increase rate for a future period is unknown, use a minimum estimate of 3% per year, or check with ORSP at 209-667-3493.

Equipment

While some sponsors supply equipment for their grantees, others have special programs to supply equipment with the understanding that the equipment is returned to the funding agency following the completion of the grant project. According to Federal guidelines (OMB-A 110), equipment is defined as items costing more than \$5,000 with a useful life of more than one year. Be sure to check with the sponsor's published guidelines or with its staff to determine what equipment purchases, if any, are allowed.

Explain exactly what equipment will be purchased and why it is necessary for the project. Price estimates should be accurate and include additional costs such as tax, shipping, and installation. For large or unusual purchases, you may be required to include a quote from one or more vendors. Check with the Purchasing Department for assistance with meeting University requirements (209-667-3243). Sponsors are rarely willing to pay for general-purpose equipment, such as bookcases, desks, or filing cabinets, and requests for personal computer equipment should be thoroughly and carefully justified.

Supplies

Virtually every project requires some expenditure on supplies. For large amounts of money, or for large portions of the total budget, the request for supplies should be explained. Prepare a brief list of the types of supplies you will need for your project. It will be useful for your own planning, even if the sponsor does not require such detail.

Travel

Travel expenses are governed by and estimated using standard CSU Stanislaus travel policies. These are cited in the *University Manual, Faculty Handbook, and the Financial Services (FS) website* (<http://web.csustan.edu/FinancialServices/Travel/index.html>). Reimbursement of travel involving multiple projects shall not duplicate payment and shall be properly documented.

It is important to include costs that may not be readily apparent such as toll fees, conference fees, airfare, hotel, and other incidentals. Some funding agencies limit travel within the United States and may even have per diem hotel rate recommendations. Examine these guidelines carefully when preparing the budget. Federal guidelines specify that federally funded projects that require travel outside of the United States use a United States air carrier for travel purposes. If this is not possible due to the location of the project, the air carrier should be approved by funding agency *prior* to purchasing the airfare.

	<i>Reimbursement Rate</i>	<i>Details & Documentation</i>
Mileage Reimbursement	50 cents/mile	If driving your own vehicle you must: <ol style="list-style-type: none">1. Have a signed Defensive Driving Waiver2. Sign a 261 Form from the Business and Finance Office indicating you are a licensed driver and have insurance.
Per Diem	\$55/day	

Campus Services

Use of the University Library, Central Computing Services, and Public Safety as part of the project activity should be included in the grant budget.

Facilities

Use of campus or University offices, classrooms, and other facilities may be included as part of the budget. The value is determined at a rate of \$8.49 per square foot per year. Faculty offices are typically 120 square feet. The cost should be proportionate to the number of days, weeks, or months the facility is to be used for proposed grant activities. Off campus facilities costs are based on the rate that would be charged to rent the space.

Indirect Costs

In addition to direct costs, externally funded projects have indirect costs. Indirect costs are defined in OMB Circular A-21 as “those that are incurred for common or joint objectives (of the University) and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity or any other institutional activity” (OMB Circular A-21, E1). These costs are also referred to as “Facilities and Administrative Costs” (F&A) and are comprised of a number of components. Facilities includes “depreciation and use allowances, interest on debt associated with certain buildings, equipment and capital improvements, operation and maintenance expenses, and library expenses” (OMB Circular A-21, F1).

In contrast to the direct costs, the purpose of indirect costs is to provide the administrative support necessary to conduct the sponsored project as efficiently as possible. Examples of indirect costs include maintaining and operating a physical plant; utilities; general administration; library; use of capital assets; and staff services such as purchasing, payroll, and accounting. All proposals submitted by CSU Stanislaus shall include requests for indirect costs at the maximum rate allowed by the funding agency in accordance with CSU and University policy. Contract or grant awards that do not follow institutional procedures and approval for submission risk not being accepted by the University (EO 890, 3.1.2).

The University’s federally negotiated indirect cost rate (through the Department of Health and Human Services) is 49% of salaries, wages, and benefits for on-campus projects and 21.4% of salaries, wages, and benefits for off-campus projects. The University also has a federally negotiated rate through the Californian-Cooperative Ecosystem Studies Unit at 17.5% of total direct. Consult with ORSP regarding the indirect rate appropriate to your proposal. These rates are to be used for all grant proposals. Funding agencies pay indirect cost recovery because they are real costs.

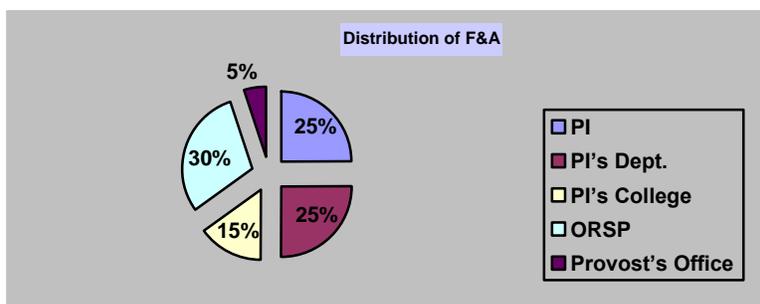
When an agency does not allow the full rate, it may specify a smaller amount that may be recovered. This smaller amount is known as the “restricted rate”. In such cases, ORSP will verify the allowable indirect cost rate with the funding agency and may build in some of the indirect costs as direct costs.

Campus Policy/Academic Affairs Distribution

The University assigns the first 8% of the indirect cost recovery to FS for accounting costs. The remaining indirect cost recovery is distributed to various offices in Academic Affairs.

Indirect cost recovery is used to support PIs, departments, schools/colleges, and the campus-wide research and program development enterprise. Consistent with this goal, Academic Affairs' indirect cost recovery distribution occurs monthly for the life of the grant and is as follows:

1. 25% of the award recoveries go to the project's PI(s) to be used to support incidental project support and/or the development of follow up research initiatives,
2. 25% of the award recoveries go to the home department(s) of the PI(s) to be used to support their department's grant-related expenses and/or provide seed money for other externally funded project development,
3. 15% of the award recoveries go to the college/school dean(s) of the PI(s) to be used to support incidental grant-related expenses and/or provide seed money for the development of new externally funded projects,
4. 30% of the award recoveries go to ORSP to be used in support of ongoing grant administration costs and/or external funding development activities, and
5. 5% of the award recoveries go to the Office of the Provost to be used in support of external funding development activities.



University Cost Sharing

Cost sharing represents the portion of the total project costs of a sponsored agreement borne by the University, rather than by the sponsor. Cost sharing of direct expenditures represents a redirection of department, college, or University resources from teaching and other University activities to support sponsored agreements. Many grants require that the University show financial support for a project by making what is called a match. When there is cost sharing or matching in connection with a sponsored program, the University in conjunction with the PI, shall document actual costs shared or matching contributions in a manner consistent with the campus cost allocation plans, sponsor requirements, and in the case of federal contracts or grants, requirements as stated in OMB Circular A-110 (EO 890, 3.5.5).

At CSU Stanislaus, the PI has overall responsibility for the technical and fiscal management of a sponsored project. This includes the management of the project within funding limitations, adherence to reporting requirements, and assurance that the sponsor will be notified when significant conditions related to project status change. While responsibility for the day-to-day management of project finances may be delegated to administrative or other staff, accountability for compliance with University policy and sponsor requirements ultimately rests with the PI. All cost sharing is tracked by FS.

Matching Contributions

When the University dedicates resources to a project or research initiative, the grant requires evidence that the University track these contributions for reporting purposes.

Faculty, Student, or Staff Time and Effort Match: It may be necessary to contribute faculty, student, or staff effort to the performance of a sponsored agreement. The commitment to provide such support binds the University to contribute the effort and record the associated expenditures, including fringe benefits.

The match becomes the value of the reassigned person's salary for the number of WTUs, usually in increments of 3, to be dedicated to the project. Once a department account has been identified as the source for the faculty match, it is the responsibility of the PI to obtain approvals for this proposed match by the department chair and college dean. The PI must maintain a time and effort report in order to document the time contributed to the project, inclusive of staff and student time and effort. The PI must provide a copy of the time and effort report to ORSP to keep in the grant project's file.

Equipment Match:

PI's should take care in preparing proposals for sponsored agreements not to commit use of University-owned equipment for cost-sharing, but rather to characterize the equipment as "available for performance of the sponsored agreement at "no direct cost to the project".

Other Direct Costs Match:

Allowable direct costs other than salaries, fringe benefits, or equipment may be committed by the PI, with proper authorization, as cost sharing on the proposal budget. The following are examples of other direct costs that may be cost shared:

- Travel expenses
- Items that do not meet the capitalization threshold
- Laboratory supplies
- Office or meeting space

Cash Match: A cash match is actual money pledged by an office of the University as a contribution to the project. These contributions are often given as unrestricted funds, allowing the project to include them in any area of the operating budget.

Total Costs

University policy is that researchers should conduct sponsored projects on a no-loss basis. In preparing the budget, all costs, both direct and indirect, should be recovered for the proposed project.

Direct Costs + Indirect Costs = Total Costs.

Proposal Review and Routing

All proposals for grants and contracts submitted to a sponsoring agency must be reviewed and approved through the University's official process before being sent to the sponsor. This review includes sign-offs in the order of the following: Research and Sponsored Programs Official, PI, Department Chair, Dean, Director of Procurement Services (if contractual), Budget Director of FS, Vice President of FS, and the Provost. The Provost, as designated by the President, shall serve as the official *Authorized Institutional Representative*. The Provost shall serve as the final authorized signature for proposals covered under this policy. If any changes are to be made in either the scope of work or budget categories, the PI must be notified of those changes. If the PI does not accept the changes, the submission cannot occur (EO 890, 3.1.1).

All proposals shall be written in accordance with the guidelines authorized by this policy and shall be completed and delivered to ORSP for review and routing at least seven (7) working days prior to the submission deadline, in order to allow sufficient time for review and oversight. However, it is highly recommended that PIs consult with ORSP very early in the grant preparation process so that the office is familiar with and advocates for the proposal most effectively. ORSP has a responsibility to present the University in the best light possible, and may not be able to meet proposal due dates when proposals are submitted later than the above timeline (EO 890, 3.1.1 cont'd.).

Understanding the Commitment These Signatures Represent

All those that sign the routing sheet accept certain responsibilities. The following table outlines the responsibilities of each signer.

PERSON	RESPONSIBILITIES/PURPOSE
Office of Research and Sponsored Programs	Ensures the proposal follows the guidelines provided by the funding agency and that the proposed project will comply with University policy governing research with human subjects, animal welfare, and other research, scholarship, and creative activity policies. In addition, the office has the responsibility to ensure the quality and competitiveness of the proposal.
Principal Investigator	Reviews for consistency of work expectations and cost recovery, and accepts responsibility to carry out commitments as detailed in the proposal.
Department Chair	Reviews and approves for consistency of work expectations and cost recovery, certifies that the proposal is consistent with departmental goals and is not in conflict with assigned duties of the PI workload and released time for departmental planning purposes.
Dean	Reviews and approves for consistency of work expectations and cost recovery, and when

	applicable, approves CSU Stanislaus cost-sharing.
Contractual review	When applicable, if proposal will result in a contractual agreement, reviews the proposal to ensure it is consistent with University contracting guidelines.
Risk Management Review	Examines long and short term agreements to assess liability, benefits, costs to the University, and any other Risk Management concerns.
Budget Review	Reviews proposal and budget to ensure proper accounts and amounts are recorded.
Vice President of Business and Finance	Reviews and approves proposal to ensure all budgetary commitments can be met. As the Chief Fiscal Officer, he/she shall review and approve the fiscal aspects of each funding proposal.
Provost	Reviews and approves the proposed research/project to be implemented under the terms and conditions described in the proposal. Binds the University to performance and serves as the Academic Affairs Officer and Authorized Institutional Representative responsible for federal representations and certifications that meet federal law, and contracting/grant making requirements.

When all the signatures are complete, the PI and the sponsor have the assurance that the University approves of the submission and will honor its commitments. The University and ORSP reserve the right to withdraw proposals, or to return funds granted for proposals that have not been properly approved. Upon its completion, ORSP will forward the proposal to the sponsor.

Meeting Deadlines

There are two types of deadlines: receipt and transmittal.

- 1. Receipt:** This means that the proposal must be received by the funding agency by the published deadline.
- 2. Transmittal:** A transmittal deadline means the proposal must be postmarked by the published deadline. Be sure to note not only the date of the deadline, but the time as well. Take into account that the time of day is in the time zone of the city where the agency resides. To facilitate the timely submission of your proposal, be sure to deliver it to ORSP at least **seven (7) business days before** the published deadline.

Other Things You Should Know About Submissions

Secure any necessary off-campus signatures and subagreements and/or memoranda of understanding well in advance of the submission date. ORSP staff will electronically submit the grant proposal or make the appropriate number of copies, package the proposal, and forward on to the sponsor in a timely manner. To eliminate possible delays or missed deadlines, contact ORSP as far in advance of agency deadline dates as possible. As soon as a detailed outline draft of the proposal is prepared, contact ORSP for assistance in preparing a budget. This will enable staff to provide appropriate assistance, to correct any errors, and to assure that agency requirements have been met.

Check with ORSP to review any other special issues that might apply to the project, e.g., other sponsor requirements, obligation of the University over a prolonged period of time, unusual employment situations, unusual space considerations, special facilities, joint or consortium proposals that require coordination with other institutions, or other items that require more time.

Post Submission Communications

The major steps taken in securing funding for a project are the conceptualizing, developing, preparing, and submitting of a proposal to a potential sponsor. Sometimes, however, actions taken between submission of the proposal and receipt of an award can be critical. These actions could include the submission of additional information requested by the funding agency, budget negotiations, contract negotiations and University commitments, pre-award commitments, and review panel assignment. All negotiations of the financial and technical aspects of an award will officially involve ORSP and FS.

Conflict of Interest

CSU Stanislaus shall follow the campus Conflict of Interest Policy. This policy shall ensure that no potential or real conflict of interest adversely affects the administration of grants and contracts. This policy also addresses both areas of conflict of interest and conflict of commitment. This policy implements federal requirements pertaining to “Objectivity in Research” promulgated by the U.S. Public Health Service and National Institutes of Health which are published in 42 CFR Part 50 and 45 CFR Part 94. In addition, this policy implements state standards as outlined in the California Administrative Code, Title 2, Section 18705, that requires disclosure of financial interest in private sponsors of research by all PIs on sponsored projects administered by the University (EO 890, 3.3.5).

Nepotism

CSU Stanislaus shall follow and be consistent with the Chancellor’s Office nepotism policy, FSA 78-19, with regard to the administration of its sponsored programs (<http://www.calstate.edu/HRAdm/Policies/FSA78-19.pdf>) (EO 890, 3.3.6).

Work Product and Record Keeping

Any contract or grant that provides for ownership or license of work product or sponsored program records to any person or entity other than the University, shall provide the University with a free-of-cost, nonexclusive license to use the sponsored program work product and the right to access and use the sponsored program records for purposes consistent with the educational mission of the University (EO 890, 3.6.1).

The University shall ensure the storage, preservation, and/or disposal of records once the sponsored program is complete. Record retention shall comply with applicable law, University policy, and the sponsor’s record retention requirements. Normally, records shall be maintained for a period of ten (10) years from the time of completion of the sponsored program. The disposal of records no longer needed shall be completed in a manner to ensure confidentiality. The preservation of records of historical value shall be completed in accordance with archival procedures of the University (EO 890, 3.6.2).

Sponsored Project Start-Up

The start-up process begins with “notice of award,” and progresses through the negotiation and acceptance phases, to establishing accounts and hiring the people needed to make the project a reality.

Notice of Award & Negotiation

Contract or grant awards shall not be accepted without prior written approval by the appropriate officials (EO 890, 3.1.2). Accepting an award is an official University function that often involves committing state resources or changes to a proposal that have not been approved in advance. Even though the PI is most knowledgeable in the technical aspects of their proposal, he/she is not authorized to conduct grant negotiations, make commitments, or accept the award on behalf of the University. While the PI will be involved in all aspects of the negotiation process, ORSP is the authorized unit to conduct negotiations on the PI’s behalf. If a PI receives a letter, phone call, or other communication from the sponsor informing them of an award that they are interested in making, he/she should contact ORSP.

Acceptance

An award is the sponsoring agency’s official document by which it obligates funds for a project. Award notification can be in the form of a letter, notice, contract, check accompanied by a letter of transmittal, standard agreement, purchase order, or similar document. Grants and contracts, if awarded, are to be accepted by the University, not by an individual (EO 890, 3.1.3). If grant start-up is scheduled to occur prior to receiving formal award notice, the University may accept another mutually negotiated form of notification to ensure the grant’s integrity until such time as formal notification is received. No PI may expend funds without University acceptance and/or notification of award. The University does not provide front-end loans for grants. *While the University is responsible and accountable for proper expenditure of funds*, the PI for the contract or grant shall be responsible for executing the project in conformance with the approved budget (EO 890, 3.5.1.1).

When award notification is received, the staff of ORSP reviews the award document for accuracy, consistency with University policies, acceptability of language, terms and conditions, and conformity with the proposal.

The grant award document serves the following purposes:

1. Notifies the grantee and others that a grant is awarded,
2. Specifies the grant terms and conditions, and
3. Provides a legal basis for the obligation of sponsor funds.

The notice will usually include: the amount and date of the grant, accounting classification numbers, certifying official's signature, and terms and conditions of the grant. The terms and conditions for federal (and most state) grants usually incorporate by reference: (1) the legislative authority and regulations; (2) the grant application and any amendments; (3) applicable policy statements, manuals, and handbooks; and (4) any special conditions applicable to the award.

Any amendment and/or modification to existing grants and contracts require University approval. Further, if amendments and/or modifications require additional University resources, alter the scope of the work involved, or commit additional reassigned time from the PI, the amended or modified contract or grant must be reviewed and re-approved by the appropriate officials (EO 890, 3.1.4).

Establish Accounts and Start-Up

When official word is received that the project will receive funding, the proposal moves from "pending" to "awarded" status by the process of setting up the project's budget and account structure in FS. ORSP will coordinate the "Start-Up" meeting. If the funding agency sends the PI the funding approval notification, the PI must forward any correspondences or contract to ORSP and FS. The following chart provides grant start-up responsibilities:

<i>Principal Investigator Responsibilities</i>	<i>Office of Research & Sponsored Programs Services</i>	<i>Financial and Business Services</i>	<i>Human Resource Services</i>
Learn all aspects of grant administration, including time and effort reporting	Review tracking requirements for reassigned time and additional employment/special consultant pay	Review allowable vs. unallowable costs, billing and purchasing	Provide overview of hiring procedures
Receive new account and project reference numbers	Review grant terms affecting grant amendments: work plan or objectives, personnel, and budget	Discuss monitoring and review of ledgers with PI and ORSP	Determine proper classification for new hires detailed in the grant
Inform ORSP, FS, and HR of time frames for project and project reports	Clarify time and effort reporting requirements	Review preparation and approval of financial reporting procedures	Review paperwork processing, interviewing, and hiring practices
Hire staff	Review technical reporting requirements and submission procedures	Provide payroll procedures and timelines	Facilitate hiring processes
Obtain equipment	Provide oversight and confirmation of human/animal subject protocol approvals	Review sub-awards, leases, or contracts	

The “Start-Up” meeting will typically include the PI and the administrative support staff, Post-award Grants and Contracts Specialist, FS Accounting Director and Grant Accountant. The “Start-Up” meeting is to assist with establishing time frames for progress and accounting reports required by the sponsoring agency. These time frames should be based on those that the sponsor requires, the amount of work involved in gathering information to be included, and sufficient time to ensure that each report is completed for ORSP or FS review and submission to the sponsor prior to reporting deadlines.

The ORSP Post-award Grants and Contracts Specialist will work with the PI, and/or administrative staff to help with any requirements and submit approval requests for anticipated changes regarding grant personnel, extension, or revision to the work-plan/objectives, or budget revisions prior to grant initial administration.

FS will work with the PI, administrative staff and/or sponsoring agency to help find the most effective ways to develop expense, payroll, and project reports expected by the funding sponsor, and maintain a fiscal system of internal accounting and administrative control for authorization and record keeping. Project expenditures made by PIs must have written administrative approval and supporting documents. If there are questions or concerns related to the fiscal implementation of the project, please contact FS.

Disbursements shall not be processed on any account unless both parties have executed a contract or unless all approvals have been obtained and the grant has been accepted. However, in extraordinary cases when the sponsor allows the institution to incur pre-award costs, written confirmation must be received from the sponsor assuring that funds will be made available. Upon receipt of this guarantee, the Authorized Institutional Representative *may or may not* approve the pre-award disbursement(s) (EO 890, 3.5.1.2).

Financial updates on the activity on the account that includes indirect cost recovery distribution is available on a monthly basis. Typically, the final fiscal report is to be completed within 60 or 90 calendar days after completion of grant project and reports. For specifics of research or project reporting (non-financial), refer to the original grant award notification.

Hire Staff

The University understands the concern for timeliness when implementing a grant or contract. The following guidelines should be used in preparing personnel action:

Non-Faculty Positions

Staff positions must be hired through a formal selection process. However, to facilitate implementation of the grant, you may hire temporary, emergency employees during the formal recruitment process. The length of the temporary appointment will vary according to the union contract. When preparing to hire non-faculty positions related to a grant, the following steps should be taken:

1. Complete the Employment Request Form (Form 38) located at: <http://web.csustan.edu/hr/Apps-Forms-Policies-Procedures/Documents/EmplReqForm.doc>

Guidelines for completing a position description may be found at the following website: <http://web.csustan.edu/hr/Apps-Forms-Policies-Procedures/Documents/EmplReqInstructions.doc> Once this is complete, submit the employment request to HR. They will confirm the position, job description, and appropriate salary range. HR approved employment requests will be submitted to FS for funding approval and position coding.

2. HR will prepare a Job Vacancy Announcement based on the position description and will post the position for a minimum of two weeks.
3. Screening and Pre-Interview Process should involve the following:
 - a. Identify members of the selection committee and determine job-related criteria for initial screening. Inform HR of the committee and related criteria for interviewee selection.
 - b. Prepare interview questions and skills tests/exercises as well as a customized Applicant Appraisal Form and submit to HR for approval prior to interviews.

- c. Conduct interviews and/or skills tests for all interviewees, make necessary reference checks, and complete Applicant Appraisal forms, identifying the final recommendations for the hiring authority.
4. Prior to offering the position to the selected candidate, consult with HR regarding any offer that may be made and receive approval for salary offer. Notify HR of the verbal acceptance and the starting date. Send letters or make calls to non-selected finalists.

Employment Categories

TEMPORARY EMERGENCY HIRES

Temporary Pool employees are hired on an hourly intermittent basis and **may be hired for 90 days or less** (*dependent on the classification*). Temporary Hires may not exceed 960 hours per fiscal year. However, if immediate support is needed while a search for a more permanent employee is being conducted, this may be a good alternative. Applicants available in the Temporary Pool may be selected by looking through the applications in HR. It is recommended that several applicants be selected to interview and verify work references with past and/or present supervisors prior to making your final selection.

STAFF

A staff person hired with grant funds must be **recruited** and undergo a competitive hiring process. These positions typically include any non-faculty position. For assistance with staff recruitment and selection procedures, classification salary ranges, and hiring guidelines assistance, contact HR. If temporary assistance is needed to make an emergency hire from the Temporary Pool, HR will assist with that process as well.

CASUAL WORKER

Casual workers are **appointed** to a position and perform intermittent work of limited duration including tasks like proctoring an exam or modeling for an art class. Casual workers are paid on an hourly basis and are not eligible for benefits, sick leave, vacation leave or shift differential. Incumbents are not eligible to earn permanent status.

SPECIAL CONSULTANT

A Special Consultant is **appointed** to a position to perform administrative studies, make appropriate recommendations, conduct oral briefing of study results, and prepare written reports. The Special Consultant's qualifications must be pertinent and justified to the assignment.

VOLUNTEER

Individuals who serve in a volunteer capacity on grants and contracts should sign a "hold harmless" agreement with the University prior to volunteering on a grant or contract. Volunteer forms are available at the following website: <http://www.csustan.edu/hr/FormsPublications.html>.

INDEPENDENT CONTRACTOR

An Independent Contractor is **appointed** to a position under an independent contract generated by Procurement Services. It is important to determine whether an Independent Contractor or employer/employee relationship exists between the University and an individual being hired. An Independent Contractor provides services related to the job being contracted and has total control over the work performed, sets his/her own hours, provides his/her own equipment, liability insurance, and office space. **Prior to hiring an Independent Contractor, complete the Consultant/Independent Contractor Determination Checklist**

(<http://web.csustan.edu/FinancialServices/Purchasing/IndContractor-SpecialLecturers/index.html>). This form should be completed by the prospective Independent Contractor and the campus department head. After the checklist is signed and completed, Procurement Services will review and determine if the worker is eligible to be hired as a contractor. Procurement Services also reviews a list of University employees to make sure the individual has not been paid as a University employee in the past twelve months. If an individual has been an employee within the last twelve months, they must be hired as an employee. Consult with HR regarding proper employment status.

A written contract helps avoid misunderstandings about what services the Independent Contractor is to perform, payment, deadlines, and other matters. Procurement Services will initiate a contract after a requisition and an approved checklist has been received. A written contract is required, regardless of the dollar amount.

Faculty Positions

When hiring faculty positions, contact Faculty Affairs immediately and refer to the guidelines for hiring faculty positions, located at the following URL:

<http://web.csustan.edu/FacultyAffairs/Web%20PDFs/Recruitment%20Manual%202006.pdf>

Student Positions

Student assistant job postings are located on the HR website at the following link:

http://www.csustan.edu/hr/Employment_Opportunities/Student/index.html

Obtain Equipment

Faculty purchasing equipment with federal grant dollars must be aware of current government black-listed vendors. A list of these vendors may be obtained from your grant accountant. During the last month of the grant period, the University generally will not approve the purchase of equipment without prior written approval from the granting agency. Equipment purchased with grant funds belongs to the grant. If the funding agency requests return of the equipment, the equipment is returned. However, if the funding agency does not require return of equipment, then it **becomes the property of the University**. At CSU Stanislaus, any equipment purchase over \$500 receives a University inventory tag. Equipment over \$500 is inventoried and is considered *minor capital*. Equipment exceeding \$5,000 is capital. For a complete guide to University policies related to equipment responsibilities, acquisition, maintenance, disposition, procedures, and property definitions, refer to the following URL:

<http://www.csustan.edu/PropertyServices/Documents/PropertyProceduresManual.pdf>

Revision of Budget and Program Plans

OMB Circular A-110, section 25(c) (1-8) states, "For non-construction awards, recipients shall request prior approvals from Federal awarding agencies for one or more of the following program or budget reasons:

1. Change in the scope or objective of the project or program (even if there is no associated budget revision requiring prior written approval).
2. Change in a key person specified in the application or award document.

3. The absence for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or PI.
4. The need for additional Federal funding.
5. The transfer of amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa, if approval is required by the Federal awarding agency.
6. The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with OMB Circular A-21, "Cost Principles for Institutions of Higher Education," or 45 CFR, part 74, Appendix E, "Principles for Determining Costs Applicable to Research and Development under Grants and Contracts with Hospitals," or 48 CFR part 31, "Contract Cost Principles and Procedures," as applicable.
7. The transfer of funds allotted for training allowances (direct payment to trainees) to other categories of expense.
8. Unless described in the application and funded in the approved awards, the sub-award, transfer, or contracting out of any work under an award. This provision does not apply to the purchase of supplies, material, equipment, or general support services."

All requests for budget revisions that require prior approval from the funding agency should be forwarded to ORSP and FS. Best practices include informing and obtaining approval for a change of more than 10% in any line item of the budget. Following is a summary of the roles and responsibilities that post-award administrators have in the revision of budget or plans:

<i>Principal Investigator Responsibilities</i>	<i>Office of Research & Sponsored Programs Services</i>	<i>Financial and Business Services</i>
<p>Works collaboratively with ORSP and FS to ensure changes are fully approved by the funding agency</p> <p>Provides formal documentation from the funding agency of approved changes</p>	<p>Works collaboratively with PI and FS to obtain funding agency approvals for:</p> <ul style="list-style-type: none"> ▪ Change in scope/objectives of program ▪ Change in key personnel ▪ Extended absence of key personnel ▪ No cost/cost extensions ▪ Change in any budget line item that exceeds 10% of the approved budget for that fiscal year 	<p>Works collaboratively with PI and ORSP to obtain funding agency approvals for:</p> <ul style="list-style-type: none"> ▪ Transfer of funds/expenditure reclasses

Sponsored Project Administration

Principal Investigator (PI)

The qualifications to serve as a Principal Investigator (PI) shall include employment by the University. Limited exceptions may be allowed for the appointment of PIs who are not employees of the University but who are officially affiliated with the University, such as individuals with emeritus status or visiting professors or researchers, as recommended by a dean, following appropriate consultation, and as approved by the Provost (EO 890, 3.3.1). In the case where the incumbent PI resigns, becomes incapacitated, or fails or refuses to perform the duties adequately, the PI's responsibilities may be reassigned. Reassignments or other resolutions may be determined in the following ways: resignation/retirement; incapacitation; and/or failure to perform duties adequately (EO 890, 3.3.1.1). When projects call for the distribution of responsibilities among PIs for multi-institutional sponsored programs, these responsibilities shall be clearly specified in the grant or contract proposal, shall be agreed upon in advance by the PI, and approved by the appropriate campus administrators (EO 890, 3.3.1.2).

Grant Objectives

The University has internal review procedures that safeguard the University's reputation with funding agencies and regularly audits grants and contracts to assure integrity. PI compliance with federal assurances, including the protection of human subjects, the care of animals, conflict of interest, and scientific misconduct, is a research integrity expectation. Any research activity that involves human subjects or animals must be reviewed and approved by the University's appropriate committees -- the Institutional Review Board for the Protection of Human Subjects in Research and/or the Animal Welfare Committee. It is the responsibility of the PI to ensure that the necessary University approvals are received prior to research start-up.

Conduct of Research

ORSP with the assistance from the PI, Department Chair, and Dean, shall provide oversight of the conduct of research and ensure progress toward fulfillment of contract or grant requirements (EO 890, 3.4.1).

Misconduct

CSU Stanislaus shall follow the campus Policy for Research Misconduct. This policy complies with those standards of the Public Health Service (PHS), the National Institutes of Health (NIH), the U.S. Department of Health and Human Services (DHHS), and the Office of Research Integrity (ORI). Employees working on Sponsored Programs *who are also* CSU employees shall remain subject to consequences outlined in the University's

disciplinary procedures for unprofessional behavior, failure or refusal to perform duties adequately, or other misconduct within the administration of grants and contracts (EO 890, 3.3.4).

Human Subject Research

CSU Stanislaus shall follow the campus *Policy on the Protection of Human Subjects* that governs the protection of the rights and welfare of human subjects in all sponsored programs research in which the institution is engaged. The CSU Stanislaus policy is derived from the Code of Federal Regulations Title 45 Public Welfare, Part 46, Protection of Human Subjects and shall be reviewed and revised as to remain consistent with federal policy (EO 890, 3.4.2).

Detailed procedures for approving and monitoring human subject research can be found at <http://web.csustan.edu/UIRB/>. As outlined in the campus policy, the President or designee is authorized to take appropriate action to implement regulations required by funding and regulatory agencies for the protection of human subjects in research (EO 890, 3.4.2.3).

CSU Stanislaus shall maintain one or more Institutional Review Boards appointed by the Provost (through the Provost as the President's designee) to ensure adequate review of proposed research and shall monitor approved research protocols involving human subjects (EO 890, 3.4.2.4).

Adequate training of research personnel and for multi-institutional sponsored programs engaged in human subjects research shall be guided by ORSP (EO 890, 3.4.2.5).

Animal Subject Research

CSU Stanislaus shall follow the campus *Policy for the Care and Use of Animals* that governs the procurement, housing, care, and use of live non-human vertebrate animals in all sponsored programs research in which the institution is engaged. In compliance with the National Institutes of Health "Guide for the Care and Use of Laboratory Animals," (NIH Publication #86-23) or as otherwise required by the U.S. Department of Agriculture under the terms of the Laboratory Animal Welfare Act (P.L. 89-544), the University Animal Welfare Committee (UAWC) shall consist of no fewer than five persons appointed by the Provost (through the Provost as the President's designee). The UAWC shall provide (1) oversight and review of all animal care and use of facilities and procedures and (2) timely certifications and reports of the human care and use of animals as required by governmental agencies (EO 890, 3.4.3).

Conduct Evaluations

Sponsors have internal controls and productivity measures to determine whether the money awarded to the University was used productively and whether the grant project accomplished its intended purpose. Project evaluation provides this evidence and is as important as conducting the project itself.

Maintain Fiscal Accounts

The PI has the responsibility for monitoring expenses to assure that spending falls within acceptable budget limits. Adequate documentation for all accounting expenditures (including payroll, supplies, expenses, travel, and equipment), budget authorization, and cost transfers are required to be forwarded to the grant accountant assigned to the PI.

The sponsored program administrator in FS shall be responsible for the timely establishment of accounts in accordance with the terms and conditions of the contract or grant (EO 890, 3.5.2.1). In addition, the

sponsored program administrator shall certify that funding is available prior to issuance of any personnel action forms (EO 890, 3.5.2.5). The sponsored program administrator's chief financial officer (or appropriate designee) must authorize payments involving personal expenditures by the PI (EO 890, 3.5.2.4).

Procedures are in place to define and document approval authority; maintain proper accounting and control of all cash receipts from contract or grant billings; review and approve all expenditures for compliance with the contract or grant; and ensure completion of accurate and timely reporting for each contract or grant (EO 890, 3.5.2.2).

The PI shall be responsible for ensuring that all expenditures are made in compliance with the approved budget, the contract or grant, and the sponsored program administrator's policies (EO 890, 3.5.2.3). The sponsored program administrator shall work with the PI, whose responsibility it is to ensure that all fiscal reports (including final reports) and billings are prepared and submitted, on a timely basis, to sponsors in accordance with the terms and conditions of the contract or grant (EO 890, 3.5.3).

Fees for Inservices, Conferences, or Events

When a grant/contract indicates that an inservice, conference, or event will be held as part of the scope of work included in the grant, PIs should clearly report any participant fees as part of their grant activities. As such, all participant fees should be deposited into a designated account code in the grant fund and be reported accordingly. Allocation of fees to a Trust Account, when the inservice, conference, or event is reported as grant activity, or in the original grant submission, is not allowed.

Cost Accounting Standards and Guidelines

Federal cost accounting standards (commonly referred to as CAS) requires consistency in estimating, accumulating, and reporting costs. The University complies with the following CAS standards:

CAS 501 – Consistency in estimating, accumulating, and reporting costs. The purposes of this standard are to (1) assure consistency in estimating, accumulating, and reporting costs as well as (2) provide a basis for comparison of such costs. The same practices should be used when estimating costs for the proposed budget, accumulating costs in the accounting system, and reporting costs to the sponsor.

CAS 502 – Consistency in allocating costs incurred for the same purpose. The University is required to charge similar costs in the same manner, either as direct costs or indirect costs.

CAS 505 – Accounting for unallowable costs. This standard does not include additional guidance on unallowable costs. Educational institutions will, therefore, continue to follow A-21 for guidance on what is unallowable. For a listing of unallowables, please see the sections titled Allowable vs. Unallowable Costs and Federal Unallowables.

CAS 506 – Cost accounting period. An educational institution must use either its fiscal year or a fixed annual period approved by the government as its cost accounting period.

The basic regulations for determining the costs of federally sponsored agreements at educational institutions are set forth in Office of Management and Budget (OMB) Circular A-21: Cost Principles for Educational Institutions. The Circular can be found at <http://www.whitehouse.gov/omb/circulars/index-education.html>

This section is intended to convey some of the most significant requirements of A-21 and the accounting practices the University follows in order to comply with them. The federal government, and therefore the University, places the primary responsibility for meeting these requirements with the PIs of sponsored projects.

All costs charged to the federal government must meet the following criteria:

They must be reasonable – A prudent person would have purchased the item and paid the same price given the circumstances at the time.

They must be allocable – The goods or services involved are chargeable or assignable to the sponsored agreement in accordance with the relative benefits received.

They must be given consistent treatment – The expenditure must be treated the same way (throughout the University) as those that are for a similar purpose, in like circumstances.

They must not be unallowable – The expenditure must not be specifically excluded by government regulations or sponsored agreement requirements.

In addition to the above criteria set forth in Circular A-21, all grant expenditures will be reviewed for the following criteria:

1. **Signatory review.** Confirm authorized signors on documents.
2. **Appropriateness review.** Is it appropriate according to the purpose of the grant?
3. **Budget review.** Does it fit in an approved line item?
4. **Account code review.** Is there an appropriate account code/data integrity review?
5. **Support review.** Is the documentation sufficient to prove/support the expense?
6. **Hospitality review.** Does it need a hospitality form? Is one attached?
7. **Original signatures** are MANDATORY for all purchase orders. Signature stamps are not accepted.

This is consistent with Circular A-21, C.4.d.(2) Internal Controls that require the institution's financial management system to "ensure that no one person has complete control over all aspects of a financial transaction". If an expenditure does not pass post audit review, the grant accountant contacts the grant PI or administrative assistant to discuss the issue and determine resolution.

Outstanding invoices for grant billings will be reviewed as follows:

- 30 – 60 days outstanding: Follow up with a 2nd notice. cc: PI
- 60 - 90 days outstanding: Follow up with a final notice and phone call to the sponsor and PI.

Remittances (checks) received in payment of grant invoices are sent directly to the Cashiers Office. Cashiers receipt the payment and send a copy of the receipt and paid invoice to FS. At the beginning of each work week, the grant accountant runs a cash receipts report to view payments posted by Cashiers during the previous week.

**Under no circumstances are PIs able to bill for services on their own when working on a University sponsored project/grant. Any collection of fees for services should be taken to the Cashier's Office with the appropriate account number and be deposited with the University within 24 hours/the next business day.*

Allocable Costs

A cost is allocable if it benefits only one project or activity, if it “benefits two or more projects or activities in proportions that can be determined with undue effort or costs,” or if it “benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved” (A-21, C.4.d.(3)). When the cost pays for something that benefits two or more projects or activities and, without undue effort or administrative expense, a distribution can be devised which reasonably reflects the proportional distribution of the benefit of the cost, the cost should be allocated based on the proportional benefit. When the cost is clearly a direct cost of a group of projects but the projects are scientifically or technically related such that the proportional benefit rule is impractical, the cost may be distributed among the projects on “any reasonable basis” (A-21, C.4.d.(3)).

Consistent Treatment of Costs

“Where an institution treats a particular type of cost as a direct cost of sponsored agreements, all costs incurred for the same purpose in like circumstances shall be treated as direct costs of all activities of the institution” (A-21, D1). Additional criteria for determining direct costs are as follows:

The cost must be included in the awarded budget, or the cost must be permitted within rebudgeting authority granted by the sponsor. When preparing applications for sponsored projects, the PI usually submits a detailed budget. This budget includes line items such as salaries and wages, benefits, travel, supplies, and other direct costs. The award reflects approved budgeted items and becomes a part of the agreement between the University and the sponsor. Only those costs that are included in the budget or rebudgeted costs allowed by the sponsor should be charged. If the cost requires institutional and/or sponsor prior approval after the award is made, the approval must be secured before the cost is incurred.

The cost must not be restricted by the sponsor. Costs that are restricted or unallowable as indicated in the award notice or sponsor guidelines may not be charged to a sponsored project.

Direct costs must meet A-21 requirements cited above and be “identifiable to a particular cost objective” (A-21, F.6.b). The “particular cost objective” requirement means that costs cannot be directly charged if they are incurred for the benefit of research in general or the interest of the research in general. They must be clearly identified with the work of a particular project or group of projects. **All documentation regarding grant expenditures, including time and effort reporting, must be maintained for a period of ten (10) years (or greater, if specified by the funding agency) following the date the final expenditure report is submitted to the sponsor, or longer if required by program guidelines. This is in compliance with EO 890, 3.6.2.** If any litigation, claim, or audit is started before the expiration of the seven year period, the records must be retained until all issues are resolved and final action taken.

Unacceptable Direct Costing Practices

The following direct costing practices are unacceptable because they do not meet A-21’s standard for a “high degree of accuracy” in the assignment of costs to sponsored agreements:

- Rotation of charges among sponsored agreements by month without establishing that the rotation schedule credibly reflects the relative benefits to each sponsored agreement;
- Assigning charges to a sponsored agreement with the largest remaining balance;
- Charging the budgeted amount rather than charging an amount based on actual usage;
- Assigning charges to a sponsored agreement in advance of the time the cost is actually incurred;

- Identifying a cost as something other than what it actually is, such as classifying a supply as an item of equipment; and
- Charging expenses exclusively to sponsored agreements when the expense has supported non-sponsored agreement activities.

Federal Unallowables

Federal cost policies dictate that certain expenditures be given special accounting treatment. Even if not directly charged to the federal government or reported as cost sharing (i.e., charged instead to a department operating account), expenditures considered to be federal unallowable costs must be separately identified in the accounting records so that they can be excluded from the University's cost in the preparation of the Facilities and Administrative Cost Rate Study. Federal unallowable costs fall into two categories: those costs unallowable in and of themselves (such as entertainment) and costs incurred for purposes that are unallowable. These unallowable purposes are as follows:

- Advertising and public relations costs,
- Gifts and awards (these are unallowable costs, unless EXPLICITLY specified in the grant/contract approved budget),
- Alumni activities,
- Commencement and convocation costs,
- Entertainment costs (including food),
- Fund raising costs,
- Lobbying, and
- Memberships and dues.

Meet Interim Billing and Reporting Requirements

When projects require extended performance periods (e.g., six months or more), the University will typically bill the sponsor for costs incurred during the project. This billing will occur on a regular basis and it may require progress reports to help justify the reimbursement. **All that are working on a project must complete time and effort reports, as required by federal regulations, to certify that they have worked the time for which they were paid and that the PI approved their billing.** ORSP can assist with the completion of this reporting requirement.

Submit the Final Report and Invoice

Once a project is completed, both the fiscal agent and University post-award services will assist the PI with close-out requirements. Each sponsor and each award has specific close-out reporting requirements. Sponsoring agencies routinely require final financial statements and technical and inventory reports. More specialized reports (such as a cost-sharing report) may also be required.

When the PI completes a report on a current project, it should first be reviewed with ORSP post-award staff. After the report has been reviewed and approved, the report will be routed for the required signature(s), if necessary, and will then be forwarded to the sponsor on your behalf. ORSP post-award staff will also be sure to provide copies to all appropriate individuals and departments on campus. This process assures that final

reporting requirements are met. Frequently, sponsors withhold final payments on grants and contracts until all the final reporting requirements are met. Reporting delays can be costly to you and to the University; failure to submit required reports on a timely basis may jeopardize future funding from this sponsor for you or other members of the University community.

Every project requires that the PI retain certain fiscal and scientific records for a specified period. Contact ORSP for help in determining how long you should keep copies of your scientific reports. The University's accounting services will retain the fiscal records on your behalf.

A Final Note

In addition, the CSU Stanislaus *Intellectual Property Rights (6/AS/98/Ad Hoc)* shall serve as the policy for the security and ownership of any product developed under the sponsored program, unless otherwise negotiated by both parties prior to the contract or grant submission and award. The University *Research, Scholarship, and Creative Activities Policy Committee* shall have general oversight and advocacy responsibility for this policy and procedures (EO 890, 3.2.3).

Terms and Definitions

CSU Stanislaus' terms and definitions for sponsored program administration complies with Executive Order No. 890 (Effective Date: 1/7/2004). These definitions are as follows:

Auxiliary: As defined in Executive Order No. 698, an auxiliary organization is a non-profit entity that complies with the applicable requirements of the Board of Trustees and campus and is included in the list of officially recognized auxiliary organizations in good standing maintained by the Chancellor pursuant to Section 42406. It may serve as the applicant agency for sponsored projects, workshops, institutes, and instructionally related activity organization.

Contract: An agreement between the University or Auxiliary and a sponsor to provide an economic benefit, generally in the form of services, for compensation. The agreement is binding and creates a *quid pro quo* relationship between the parties.

Grant: A financial contribution to a recipient to carry out an approved project or activity. A grant generally anticipates no substantial programmatic involvement of the sponsor with the recipient during performance of the project or activity, but sponsors usually request an accounting of the use of funds and results of the project or activity. The University or Auxiliary may commit resources or services as a condition of the grant.

Principal Investigator: The individual (whether referred to in the contract or grant as a Principal Investigator (PI), Project Director (PD), or other similar term) designated by the sponsored program administrator to be responsible for ensuring compliance with the academic, scientific, technical, financial, and administrative aspects and for day-to-day management of the sponsored program.

Recipient: The University or Auxiliary awarded a contract or grant. The recipient is the University or Auxiliary, as the case may be, even if a particular component is designated in the award document and shall not be an individual, department, or other constituent unit.

Sponsor: The party paying for the services or other economic benefit under a contract or providing the financial contribution for a project or activity under a grant.

Sponsored Program(s): All work performed under grants or contracts funded by non-CSU funding sources (including non-CSU-funded grants and contracts that are subsequently subcontracted to another campus).

Sponsored Program(s) Administrator: The entity (University or Auxiliary) designated by the recipient to administer the sponsored program.

Sponsored Program Records: These include, but are not limited to: accepted proposals and applications; contracts or grant agreements; program reports and data; correspondence; budgets and supporting financial documentation; supporting human resources documentation; and other records relating to receipt, review, award, evaluation, status, and monitoring of the sponsored program.

Sponsored Program Work Product: Any work created in the performance of a sponsored program. Unless the contract or grant states otherwise, sponsored program work product does not include journal articles, lectures, images, books, or other works that are subject to copyright protection and have been created through independent academic effort and based on the findings of the sponsored program.

University: One of the campuses of the CSU or the Office of the Chancellor.

Types of Funding

There are other types of definitions used to describe grant awards. These include the following:

Contracts: A contract is a legally binding agreement between one or more sponsor(s) and the University. The terms of the agreement outline specific goals and requirements for goods and/or services to be provided to the sponsor by the University.

Cooperative Agreements: A cooperative agreement is used when substantial sponsor involvement is anticipated in the management and/or performance of the sponsored activity. In all other respects, a cooperative agreement is a grant-type instrument.

Grants: A grant agreement is a legal instrument used when the principle purpose is the transfer of money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or stimulation.

Subcontracts: A subcontract is a contract that assigns some of the obligations of a contract to another party. The terms of the obligations are outlined in the same manner as described under contracts.

Sources of Funding

The four major sources of funding from which the University receives sponsored agreements are as follows:

Federal: Sponsored agreements funded directly by the United States federal government.

Federal Pass-Through: Sponsored agreements where the University is not the prime contractor from the United States federal government, but is acting in the capacity of a subcontractor (federal requirements/restrictions are passed through the prime recipient from the federal government to the University).

Private: Sponsored agreements funded by private corporations or foundations.

State: Sponsored agreements funded directly by the State of California.

Commonly Used Terms in the Management of Grants and Contracts

Allowable Cost: For purposes of OMB Circular A-21, an expense that can be included in the facilities and administrative cost rate proposal or included as a direct cost to federal sponsored agreements, and if is not specifically excluded by government regulations or by the contract/grant/cooperative agreements. See Federal Unallowables in Chapter 4: Sponsored Project Administration.

Carryover (carry forward): The remaining available budget balance of a project that may be used to increase the budget of the next budget period. Carryovers are not always automatic and are not always allowed by all funding agencies.

Cost Accounting Standards (CAS): CAS requires consistency in estimating, accumulating, and reporting costs.

Guidelines for Contacting External Funding Agencies

ORSP shall implement the policy and related guidelines and shall serve as the repository for this policy and proposals receiving extramural funding. The University administration recognizes that in order to be successful in securing external support, particularly among corporate and private foundations, it is important to coordinate the University's approaches to such agencies.

FUNDING SOURCE:	Gift	Private/Foundation Grant	Federal/State Grant	Contractual
Clearance:	Office of University Advancement	Office of Research & Sponsored Programs		
Responsibility:	Evaluates whether to accept the gift. Consults with affected units.	Contact with the anticipated funding source is determined and strategically initiated by ORSP and the PI. For research with human subjects, faculty must submit a protocol to the Institutional Review Board (IRB) for approval prior to research. Contact the Campus Compliance Officer at 209-667-3747 for information.		
Authorizing Approval(s):	Vice President of University Advancement	Office of Research and Sponsored Programs Provost		