

SPONSORED PROJECTS HANDBOOK

Boston University

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Introduction

Boston University is committed to providing resources to facilitate high-quality research, depth of knowledge, education of students, and the promotion of public welfare. The institution is also dedicated to preserving the public's trust in its faculty and staff. To this end, the University expects every member of its community to maintain the highest standards of conduct in pursuing research activities and to be vigilant against fraud, misuse, or mismanagement of funds provided by both BU and sponsors external to the University.

This handbook is a product of collaborative and shared effort between the Office of Sponsored Programs (OSP), Post Award Financial Operations (PAFQ), Research Compliance and the Offices involved in the management and oversight of the research enterprise. It is designed to provide information, policies, procedures, and links to ensure that faculty, staff, and students comply with the obligations associated with the use of external or institutional funds to conduct research and other scholarly activities.

While this handbook is a compendium of official statements of University policy, and every attempt is made to keep the handbook current, readers must necessarily rely on links to specific departmental policies which are referenced throughout the document.

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PREAMBLE

Boston University is dedicated to preserving the public's trust, and expects all faculty and staff to maintain the highest standards of conduct in pursuing research activities. The University is committed to providing resources to facilitate high-quality research, depth of knowledge, education of students, and the promotion of public welfare. Boston University adheres to federal and sponsor laws and regulations, as well as to the regulations and policies developed by the University.

Stewardship of any research enterprise is a shared responsibility between those who conduct research and the institution at which that research is undertaken. It is essential that researchers address all of the obligations associated with the use of external or institutional funds. Failure to do so may result in sanctions against the institution as well as its faculty and staff. This handbook provides an overview of the University's program of compliance, which begins with documentation of policies, practices, procedures, and controls, and proceeds to the delineation of roles and responsibilities, and the programs dedicated to educating investigators and staff about those roles and responsibilities.

Chapter One

Standards for the Conduct of Research at Boston University

It is Boston University policy to encourage research and scholarly activities essential to the training of students, the germination and transmission of knowledge, and the intellectual growth of faculty. To achieve these objectives, Boston University has developed a set of guiding principles and policies.

1.1 Boston University Standards of Business Conduct

Each member of Boston University's community is expected to conduct activities at the highest professional and ethical standards and to adhere to the University's Standards of Business Conduct in dealings within and external to the University. These principles serve as a distillation of well-established policies and procedures to reinforce the importance of complying with them in all applicable situations.

Boston University Standards of Business Conduct:

- [Ethics](#) (which contains the current Code of Ethical Conduct)
- [Ethical External Compensated Activity](#)

1.2 Academic Fraud and Misconduct

Boston University expects its academic community to maintain the institution's long-standing principles of integrity and guard against academic misconduct. As a part of that responsibility, the University has developed detailed procedures for addressing allegations of academic misconduct in a fair and timely manner.

Policies and Procedures for Dealing With Allegations of Academic Fraud at Boston University:

<http://www.bu.edu/handbook/ethics/misconduct-in-scholarship-and-research/>

1.3 Training

Currently, Currently, BU provides training in specific compliance areas as required to conduct research projects. These areas include, but are not limited to, responsible research practices, the use of human subjects, the care of animals, safe handling of biohazards, and radiation safety. A training program for human embryonic stem cell research (hESC) is currently being considered. In addition, training modules for the management of research grants are being developed and will soon be available to faculty and departmental administrators.

For Additional Information see:

<http://bu.edu/research/compliance>

1.4 Responsible Conduct of Research (RCR)

In response to a perceived need by federal and private granting agencies and associations, the University has published its Plan for Training in the Responsible Conduct of Research and Mentoring of Graduate Students and Post-Doctoral Researchers, outlining the responsibilities of faculty and University officials to provide training to students and postdoctoral fellows in the responsible conduct of research. Variations in the National Science Foundation (NSF) and National Institutes of Health (NIH) requirements are described below.

NSF expects institutions to be able to verify that those students (undergraduates and graduates) and postdoctoral researchers who receive NSF funds (support from salary and/or stipends on NSF grants) will obtain RCR training. The RCR training requirement applies to all proposals submitted or due on or after January 4, 2010 to conduct research and excludes, for example, conference, symposium, workshop, or travel proposals. BU certifies in each relevant NSF proposal that it has a plan to ensure compliance with these requirements. The plan, cited above, requires the lead researcher—referred to as the Principal Investigator (PI) or Program/Project Director (PD)—to ensure that their covered trainees complete the training.

NIH requires that all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant receive instruction in the responsible conduct of research. This applies to all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011. This Notice applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements. These NIH grant applications must describe the RCR instructional program to be provided, and OSP will provide the PI/PD with a template for the RCR Training Plan. Training plans must be reviewed and approved by OSP.

For Additional Information see:

<http://bu.edu/research/compliance/rcr/index.shtml>

1.4.1 Authorship

Investigators should understand and properly fulfill their responsibilities with respect to authorship consistent with the uniform requirements for manuscripts submitted to journals, many of which have established standards.

For Additional Information see:

<http://bu.edu/research/compliance/rcr/index.shtml>

1.4.2 Mentorship/Supervision of Trainees

Trainees, both predoctoral and postdoctoral, have the right and the responsibility to ensure that they are adequately supervised during their research training and that the research itself is performed in a manner which reflects high standards for the responsible conduct of science.

In addition, NSF has issued revised guidelines to implement the mentoring provisions of the America COMPETES Act (ACA) (Pub. L. No. 110-69, Aug. 9, 2007). As specified in the ACA, each proposal that requests funding to support postdoctoral researchers must include a description of the mentoring activities that will be provided. Proposals that do not comply with this requirement will be returned without review (see NSF's *Grant Proposal Guide*, Chapter II for further information about the implementation of this new requirement).

The Plan for Training in the Responsible Conduct of Research and Mentoring of Graduate Students and Post-doctoral Researchers spells out generic responsibilities for mentoring and as the plan is implemented, additional resources will be made available.

For Additional Information see:

http://www.nsf.gov/publications/pub_summ.jsp?ods_key=gpg

1.4.3 Management of Data

There are numerous ethical issues associated with the collection of research data. Among the key ethical issues that should be identified and discussed before research proceeds are what methods should be used to obtain data, which parties are rightfully entitled to ownership of data, and the proper means of disclosing data.

The procedures used for collecting data can vary greatly depending on the type of research being conducted. However, a vital component of any data collection is good record keeping. Responsible research practice typically requires that notebooks are maintained in a precise and detailed manner. Without complete documentation of how research data were obtained it can be difficult for the researcher to defend a patent application, or for others to replicate an experiment.

Data ownership is another important issue pertaining to research, due in part to the future research opportunities and/or possible commercial applications that the data may present. When an agreement is established among researchers, institutions, and funding sources, the issue of data ownership should be directly addressed.

Data disclosure and data sharing also raise a host of ethical issues. For example, if a researcher has access to proprietary information, the researcher might have a duty not to reveal that information to other individuals unless they are entitled to it. Additional privacy and confidentiality concerns can emerge if data from research with human subjects is shared without consulting relevant ethical and legal guidelines.

The University requires that all documents related to federally sponsored projects, including primary research data, be available to federal auditors for the period specified by federal regulation—in most cases, three years from the filing of the final required financial report. Non-federal sponsors typically require that records of a project be retained for a period of three to seven years. This requirement applies to

original data as well as financial records relating to a project, and includes records in all formats, including paper and electronic files.

For Additional Information see:

<http://www.bu.edu/policies/administrative.html> (search for “University Record Retention”)

1.5 Sexual Harassment

Sexual harassment is antithetical to academic values and to a work environment free from the fact or appearance of coercion. It is a violation of University policy and may result in serious disciplinary action. The University provides training and education about sexual harassment. All members of the faculty and staff who have the authority to hire, discharge, assign, or direct one or more individuals should attend one session.

For Additional Information see:

<http://www.bu.edu/hr/policies/federal-and-state-laws/sexual-harassment/>

1.6 Equal Opportunity

Boston University is an equal opportunity employer and does not discriminate in employment against any individual on account of that individual’s gender, race, color, religion, age, disability, sexual orientation, or national or ethnic origin.

For Additional Information see:

<http://www.bu.edu/handbook/human-resources/equal-opportunityaffirmative-action>

1.7 Disclosure of Conflict of Interest

All persons responsible for designing, conducting, or reporting on research and related activities in the course of their work at Boston University, including externally and internally funded initiatives, are governed by this policy. These regulations apply to all PI/PDs and co-investigators and may include others (e.g., graduate students, post-doctoral fellows, and technicians) if they have such responsibilities. Disclosures are required as follows:

1. Whenever a PI/PD files a new, continuation, or renewal application, all investigators on the research must disclose any conflict of interest.
2. Whenever a PI/PD files a non-federal proposal for covered research, all investigators on the research must make disclosure.
3. Whenever a PI/PD files an application with the BU Institutional Review Board (BUIRB) for initial review, all investigators on the research must make disclosure.

These disclosures must be supplemented whenever there is a material change in the information previously disclosed. Investigators who join an ongoing project must also make disclosure.

For Additional Information see:

[Policy on Investigators Conflicts of Interest](#) and [Financial Conflict](#)

1.8 Outside Interest and Employment

The University encourages its faculty to participate in activities that benefit not only the individual faculty member, but also the University and the public. However, no outside interest will be permitted to compromise the integrity of teaching, research, and scholarship at Boston University, nor will such interests be permitted if they detract from the fulfillment of a faculty member's essential obligations to the University.

For Additional Information see:

<http://www.bu.edu/handbook/ethics/external-compensated-activity>

1.9 Use of Boston University's Name

The University does not permit the use of its name in advertising or promotional material related to the results of sponsored projects without the prior written approval of an officer of the University. This does not include the use of the BU logo in presentations of research results, posters, or other scientific materials. The Vice President of Marketing and Communications is responsible for reviewing and approving such requests.

For Additional Information see:

<http://www.bu.edu/brand/logo/>

1.10 Openness in Research

Boston University is committed to freedom of access for all interested persons to the underlying data, processes, and final results of research through the publication and broad dissemination of those results. As evidence of that commitment, on February 11, 2009, the University Council passed a resolution concerning the free and open exchange of scholarship. Openness requires that Boston University not undertake on the campus classified research or research whose results may not be published without prior approval by the sponsor. Openness also requires that, unless prohibited by law, no restriction on participation in research be based on country of origin or citizenship. Any exceptions to this must be approved by the Associate Vice President for Research Compliance or the University Provost or Medical Campus (MED) Provost, as appropriate.

For Additional Information see:

<http://www.bu.edu/orc/export/>

1.11 Publication Rights

The University requires that investigators be permitted to publish the results of their research without the prior approval of a sponsor. Prior agreement may, however, allow sponsors a brief period to review proposed publications and presentations prior to submission in order to identify and request the removal of a sponsor's confidential information, or to identify intellectual property requiring protection. Generally no longer than 30 days (with an additional 60 days upon permitted to allow for such

protection. Prior agreement may also permit sponsors a brief period to review proposed publications and presentations to identify patentable materials and/or inadvertent disclosure of proprietary information, if applicable. Delays in publication of greater than 90 days will be permitted only in instances when it is necessary to protect public health and safety, such as in the case of multi-center clinical trials. In addition, NIH currently requires that peer reviewed articles in journals be submitted for publication to PubMed Central (see [section 12.2](#)).written request) will be

1.12 Patents, Licensing, and Copyrights

The Office of Technology Development (OTD) provides oversight for patenting and licensing activities between faculty and industry. The University takes title to all patents and certain copyrighted material that result from the research activities of faculty, staff, and students. When the University gives up the right to pursue patent application, the PI/PD may still do so. If a patent is issued to the PI/PD, BU has no rights to it.

Faculty are required at the time of hire to sign a Patent Policy Acknowledgment & Agreement form. An Invention Disclosure form is required when the individual has an invention.

For Additional Information see:

Charles River Campus (CRC):

- [Patent Policy](#)

Medical Campus:

- [Patent Policy](#)
- [Office of Technology Development](#)

The patent policy revision currently underway will align the policies and procedures on the two campuses.

Chapter Two

General Guidance on the Administration of Sponsored Projects

2.1 What is a Sponsored Project?

Sponsored projects are established when funds or other consideration are awarded to the University by external sources in support of research, instruction, training, service, or other scholarly activities under an agreement where one or more of the following conditions apply:

- The award agreement requires endorsement (i.e., a formal signature or other method of acceptance) and binds the University to a set of terms and conditions.
- The agreement obligates the PI/PD to a line of scholarly or scientific inquiry that typically follows a plan, provides for orderly testing or evaluation, or seeks to meet stated performance goals.
- The agreement establishes an understanding of how funds will be used or includes a line item budget that identifies expenses by activity, function, or project period.
- The agreement requires fiscal accountability as evidenced by the submission of financial reports to the sponsor, an audit provision, and may require the return of unexpended funds at the conclusion of the project.
- The agreement obligates the PI/PD to report project results or convey rights to tangible or intangible properties resulting from the project. Examples of tangible properties include equipment, records, technical reports, theses, or dissertations. Intangible properties include rights in data, copyrights, inventions, or other terms of legal accountability.

2.2 Gift or Sponsored Research

A gift is any item of value given to the University by a donor who expects nothing of significant value in return other than recognition and disposition of the gift in accordance with the donor's wishes. Although a donor may place some restrictions on the use or disposition of a gift and may require a report that demonstrates that the donor's wishes have been met, these terms do not make the gift a sponsored award. Such "restricted gifts" essentially create a fiduciary responsibility in which the University, by accepting the gift, is obligated to carry out the wishes of the donor.

For Additional Information see:

[Ethics for Gift Policy](#)

2.3 Who Can Submit a Proposal for Externally Sponsored Activity?

PI/PDs assume the primary leadership role in externally sponsored activity in order to ensure that research is conducted by those who have the requisite training and skill as well as the appropriate relationship to Boston University. Faculty who serve more than 50% of their time in faculty positions as defined in the faculty handbook (except those defined as Instructor [on the

CRC] or in any of the Visiting Professor categories) can represent the University as PI/PDs on grant and contract applications. In addition, faculty who serve less than 50% of their time in faculty positions as defined in the faculty handbook may assume, with prior approval, the role of PI/PD on a Boston University grant, and long-term employees in some non-faculty research positions and those holding the title of Lecturer or Instructor or Clinical Instructor (on the MED Campus only) may be a PI/PD on an external grant with specific written approval.

Determination of PI/PD Status

<http://www.bu.edu/research/about/ethics/research-policies/>

2.4 Other Personnel Involved in the Conduct of Research

2.4.1 Visiting Researcher

This category includes uncompensated members of the University community who participate in and contribute to its research programs and scholarly projects. A doctorate, terminal degree, or equivalent is required.

2.4.2 Visiting Fellow

This category includes short-term, compensated members of the University community who participate in and contribute to its research programs and scholarly projects. A doctorate, terminal degree, or equivalent is required.

2.4.3 Research Fellow

This category includes compensated members of the University community who participate in and contribute to its research programs and scholarly projects. A master's degree or equivalent (including all-but-dissertation status) is required.

2.4.4 Postdoctoral Fellow

This category includes individuals supported on an externally funded training grant and engaged in a temporary and defined period of mentored advanced scholarship and professional development in research/teaching following completion of a doctoral degree program. No services can be required of fellows by virtue of their appointment and their stipends do not constitute payment of salary for services rendered.

2.4.5 Postdoctoral Associate

These individuals have received a doctoral degree or equivalent and are engaged in a temporary and defined period of mentored scholarly development. Typically this position is an entry-level postgraduate appointment. These individuals pursue advanced training and professional development in research/teaching, like a Postdoctoral Fellow, but are BU employees with assigned duties.

2.4.6 Senior Postdoctoral Associate

These individuals have received a doctoral degree or equivalent, have a minimum of three years of postgraduate experience, and continue in a temporary and defined period of mentored scholarly development. They continue advanced training and professional development in research/teaching, like a Postdoctoral Fellow, but are BU employees with assigned duties.

2.4.7 Hiring of Staff

Hiring of managerial, administrative, and professional staff is handled through Human Resources (HR). HR maintains descriptions of the requirements for each type of position and the salary ranges which may be offered for Managerial and Professional (M&P) personnel. PI/PDs should work with their departmental administrators regarding M&P staff.

For Additional Information see:

http://www.whitehouse.gov/omb/circulars_a021_2004/ (Section F.6(b)(2) and Appendix C.)

2.4.8 Temporary Replacement Personnel

If a replacement must be found for a permanent employee who is on short-term leave, PI/PDs should work with their departmental administrators regarding temporary replacement personnel.

2.5 Administrative Offices in Support of Research

Sponsored Programs administration is a joint effort between the University administrative offices, including, but not limited to, the Office of the Provost, the Provost of the Medical Campus, the Associate Vice President for Research Compliance, the Vice President for Finance, the Comptroller, the OSP, and the Post Award Financial Operations (PAFO), the deans and chairs, and the PI/PD.

2.5.1 Corporate Responsibilities

Externally sponsored project funding is conferred to the University under its corporate name: Trustees of Boston University. Therefore, awards of funds for sponsored projects are awards to the University and commitments under agreements are commitments of the University. Any work performed by a faculty member of the University under such a project must be considered as work performed for the University.

2.6 Roles and Responsibilities

Each member of Boston University is expected to adhere to the University's Standards of Business Conduct in dealings within and external to the University. Persons affiliated with BU are accountable to each other, to the University, and to themselves for their actions and decisions. When roles or responsibilities are unclear,

they should take it upon themselves to obtain clarity. They should exercise sound business judgment in the execution of their responsibilities, to the best of their ability. In addition, many BU policies identify specific roles and responsibilities for various stakeholders who are covered by the policy.

For Additional Information see:
[Boston University Code of Ethical Conduct](#)

2.6.1 Principal Investigators (PIs) and Project/Program Directors (PDs)

The PI/PDs are responsible for the overall scientific and technical quality of individual projects conducted under their auspices as well as complying with the financial and administrative policies and regulations associated with the award. While the University is held legally and financially accountable to sponsors for the performance of the activity funded and the proper use of funds, this task cannot be accomplished without the full cooperation and oversight of the PI/PD.

PI/PDs should ensure the accuracy of the information provided in an application and are responsible for the scientific and intellectual direction of their project, and for the submission in a timely manner of all required technical, progress, and invention reports. They are also responsible for reviewing the financial reports prepared by the University before submission.

PI/PDs may have administrative staff to assist them with the management of project funds. However, the ultimate responsibility for the management of the sponsored research project work and funds rests with the PI/PD.

The fundamental responsibilities of the PI/PD during the post-award phase of a sponsored research project include:

- Executing the project as outlined in the funded proposal.
- Using sound management techniques.
- Authorizing only those expenditures that are reasonable and necessary to accomplish the project goals and are consistent with the sponsor's terms and conditions.
- Spending no more than the amount authorized by the sponsor for the project period.
- Subcontracting and purchasing only through duly authorized processes.
- Carrying out the project's financial plan as presented in the funded proposal, or making changes to the plan following a prescribed set of policies and procedures.
- Reporting project progress to the sponsor as outlined in the terms of the award.
- Reviewing expenditures in a timely fashion—not less often than monthly—to assure their appropriateness and correctness.
- Detecting errors and initiating cost transfers when necessary.
- Complying with all BU policies and procedures related to project management and personnel practices.
- Complying with all applicable sponsor rules, regulations, and/or terms and conditions of the award.
- Certifying effort through signing Personnel Activity Reports (PARs).

2.6.2 Deans and Chairs

Department chairs have a general responsibility for promoting the scholarly and research activities of their departments as well as fostering sound stewardship of funds. They review applications for research projects for suitability, assuring that the personnel, fiscal, and space demands of all such projects are in the best interest of both their department and the University as a whole. School deans have the same responsibility for their schools.

2.6.3 The Departmental Business Office

At the time of proposal preparation, departmental administrators are responsible for assisting in the preparation of budgets, providing accurate estimates for salary and other budget items, preparing current and pending support information, verifying availability of space and other resources to conduct the work, coordinating with other business offices to obtain verification and approval for non-departmental personnel involved on a project, coordinating documentation for subcontracts and/or consultants, and assisting the PI/PD in complying with any relevant special reviews.

The University places the prime responsibility for the conduct of the sponsored projects on the PI/PD. However, post-award, the departmental administrator may be the most involved in the day-to-day administrative operations of the project. The PI/PD may delegate some responsibility for the management of finances or other tasks to departmental and school business staff, but the PI/PD remains accountable for compliance with University and sponsor policy and financial, administrative, and programmatic requirements.

2.6.4 Office of Sponsored Programs (OSP)

The Office of Sponsored Programs' mission is to provide comprehensive support services to faculty, professional staff, and students at Boston University for the successful administration of their research projects. OSP is responsible for providing assistance to faculty, PI/PDs, other researchers, and their administrators in the identification of resources for research and other scholarly activities. Additionally, the office generates and processes proposals to external entities and manages individual sponsored projects consistent with Boston University's academic and research policies, and with the stewardship requirements of and obligations to external sponsors.

In summer 2009, the sponsored programs offices on the CRC and the Medical Campus began reporting to the Assistant Vice President for Sponsored Programs. On both campuses, the OSP is charged with the following functions:

- Assigning a Research Administrator to each department or school whose responsibility is to assist the departmental administrator and faculty in successful administration of the research project.
- Providing access to funding opportunities via the Community of Science or, as appropriate, special opportunity announcements.
- Reviewing proposals for compliance with all applicable institutional policies as well as all sponsored program requirements, including application requirements.

- Alerting PI/PDs and/or departments to potential problems with the funding source (e.g., onerous reporting requirements, problematic intellectual property policies, etc.).
- Ensuring that information provided related to any required assurances to federal agencies are accurate and complete (i.e., the use of human subjects or animals in research, lobbying, conflict of interest, etc.).
- Requesting approval for any unusual sponsor requirements such as waiver of indirect costs, restrictions on dissemination of results, and restrictions on publications.
- Verifying cost share commitments and/or matching funds.
- Verifying documentation for subcontractors and/or consultants.
- Reviewing proposal routing form for appropriate signatures and PI/PD compliance with relevant special reviews.
- Signing/obtaining signatures on proposals for submission to sponsors.
- Submission of proposals to sponsors, including submission of electronic proposals.
- Reviewing and negotiating grant and contract awards.
- Providing financial and administrative management and monitoring of sub-recipient agreements.

Note: Responsibility for management and monitoring of sub-recipient agreements is shared between OSP and PAFO and is further detailed in the new Sub-recipient Manual.

- In addition to the functions listed in 2.6.4, the OSP provides support for all industry sponsored research conducted at BUMC or BMC, including reviewing proposals and negotiating clinical study agreements.

For Additional Information see:

[CRC](#) and [BUMC](#)

2.6.5 Post Award Financial Operations (PAFO)

Post Award Financial Operations works closely with the University's research community to provide seamless processes from pre-award to post-award activities while ensuring compliance and consistency with overall fiscal management. PAFO's responsibilities include research accounting and financial management functions, time and effort certifications, indirect cost rate calculation and negotiations, service center administration, property management, coordination of the annual Federal Office of Management and Budget (OMB) Circular A-133 audit and periodic agency audits, the creation and implementation of related policies and business processes, and oversight of systems and training.

The primary responsibilities of PAFO during the post-award phase of a sponsored research project include:

- Providing post-award financial administration support to departments, including monitoring of accounts.
- Providing financial reporting to sponsors.
- Managing receivables, billings, and letter of credit (LOC) draws.
- Following up with sponsors on outstanding payments as required by the terms of agreements.
- Overseeing the administration of the effort reporting function, including the Personnel Activity Reporting System.

- Coordinating government, private sponsor, and public accounting firm audits.
- Developing and negotiating federal Facilities and Administrative (F&A) and fringe benefit rate agreements.
- Conducting space function and departmental administration surveys.
- Reviewing and approving calculated rates for Service Centers (see 9.10.7).

Chapter Three

Assurances for Proposal Submission

Certain special reviews and approvals may be necessary to ensure compliance with University and sponsor requirements when preparing a proposal. The review and approval procedures listed below are mandated by federal statute and/or regulation. Violations can lead to the loss of federal and nonfederal support. University policy requires these reviews for all internally or externally funded projects.

3.1 Human Subjects Research

Boston University investigators conducting research involving human subjects, whether externally funded or not, must submit a proposal research plan to the appropriate BU IRB for review and receive approval from the IRB prior to beginning the human subjects research.

For Additional Information see:

[CRC](#) & [MED](#)

3.1.1 Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security

The HIPAA Privacy Rule protects the privacy of “protected health information” (PHI) at Boston University’s HIPAA-covered components and at BMC, including when personal health information is used or collected in human research. The HIPAA Security Rule safeguards PHI that is in electronic form. Boston University and BMC each have policies and procedures to comply with the HIPAA Privacy Rule and the HIPAA Security Rule with respect to the institution’s PHI. For researchers to gain access to existing PHI that is held by any of Boston University’s “HIPAA-covered components” or by BMC, they must provide written assurances that the health information will be used and protected in compliance with HIPAA policies. Researchers who collect new PHI for research directly from patients of a covered entity/component must collect, use, and protect the information in compliance with HIPAA policies. The research members who will have access to the PHI must receive HIPAA workforce training. The IRB should be consulted to determine whether or not specific research use of PHI constitutes human subjects research that requires IRB review. HIPAA Privacy Rule protects the privacy of "protected health information" (PHI) at Boston University’s HIPAA-covered components and at BMC, including when personal health information is used or collected in human research. The HIPAA Security Rule safeguards PHI that is in electronic form. Boston University and BMC each have policies and procedures to comply with the HIPAA Privacy Rule and the HIPAA Security Rule with respect to the institution’s PHI. For researchers to gain access to existing PHI that is held by any of Boston University’s “HIPAA-covered components” or by BMC, they must provide written assurances that the health information will be used and protected in compliance with HIPAA policies. Researchers who collect new PHI for research directly from patients of a covered entity/component must collect, use, and protect the information in compliance with HIPAA policies. The research members who will have access to the PHI must receive HIPAA workforce training. The IRB should be consulted to determine whether or not specific research use of PHI constitutes human subjects research that requires IRB review.

For Additional Information see:

[HIPAA](#)

3.1.2 Project-Specific Conflict of Interest

A Project Specific Disclosure (PSD) form must be filed by every investigator engaged in a research project to disclose at the outset any significant financial interest (as defined in links below) that could reasonably appear to be affected by the design, conduct, or reporting of *research*. This same form is also used for supplemental disclosure to report any material change in a previously filed disclosure. PI/PDs are responsible for submitting a list of all investigators including those responsible for designing, conducting, or reporting covered research on a project. Applications for research funding will not be submitted until all PSDs are on file.

For Additional Information see:

[Policy on investigators conflicts of interest](#) and [Financial conflict](#)

3.2 Animal Care and Use

Boston University investigators conducting research, training, or education involving vertebrate animals, whether or not funded by a federal sponsor, must submit an application for review to the Institutional Animal Care and Use Committee (IACUC). IACUC approval must be granted before animals are procured and/or prior to initiating any work involving animals. In conjunction with the animal care and use application, a copy of the sponsor's proposal should also be submitted to the appropriate committee for review. The location of animal housing and use determines which campus's IACUC is responsible for review of the proposed activity. PIs are responsible for assuring that there is an approved protocol on file with the IACUC office prior to any work involving the use of animals and, in the case of externally funded research, that the approved protocol is linked with a specific proposal or sponsored project.

For Additional Information see:

[IACUC](#)

3.3 Environmental Health and Safety

The mission of Environmental Health and Safety (EHS) is to provide a safe environment for students, employees, faculty, and staff as well as patients and others studying, working in, or visiting BU facilities. The department's programs provide for a safe environment and also help to ensure compliance with federal, state, and local codes and regulations. EHS has five divisions that establish the Boston University and BMC comprehensive safety management structure. These divisions include Research Safety, Campus and Clinical Safety, Radiation Safety and Medical Physics, Emergency Response Planning, and Environmental Management. Technical areas that make up these divisions include biosafety, laboratory safety, chemical safety, controlled substances, industrial hygiene, fire safety, construction safety, hospital safety, workplace safety, radiation protection, medical physics, laser safety, non-ionizing radiation, pollution prevention, environmental regulatory compliance, and hazardous materials management and emergency management. EHS provides training, conducts inspections, and manages specific programs in these

areas. The University's policies regarding environmental health and safety issues are established in the EHS Policy Manual.

For Additional Information see:

[Environmental Health and Safety](#)

3.4 Biological Safety

The Research Safety Division provides the oversight of all work involving biological materials, and assesses risk and defines containment for their safe use. The foundation of the program centers on the use of engineering controls, safe work practices, and personal protective equipment to prevent workplace exposures and injuries. PI/PDs have specific responsibilities relating to work with biological materials. The assessment includes examination of the agent(s), standard operating procedures, and proposed laboratory equipment. This examination is conducted by the biological safety officer in collaboration with the Institutional Biosafety Committee (IBC). Prior to starting work, PI/PDs are responsible for registering all proposed work with recombinant DNA and biological agents. Training programs in biosafety will help to ensure that appropriate containment of these materials is maintained. Biohazardous materials and organisms include all infectious agents or biologically derived infectious materials that present a risk or a potential risk to the health of humans or animals, either directly, through infection, or indirectly through damage to the environment. A Biological Use Authorization application must be submitted to the IBC prior to initiation of any project involving use of these materials or agents.

For Additional Information see:

[Biological Safety](#)

3.5 Radiation Safety

The Radiation Safety and Medical Physics Division is responsible for ensuring that all clinical and research uses of radioactive materials and ionizing and non-ionizing radiation-generating devices at BU, BMC, and its affiliated neighborhood health clinics are safe for workers, patients, and the general public, and that such use is in compliance with applicable regulations. The division is composed of two departments: the Department of Radiation Safety and the Department of Medical Physics. The Radiation Safety Department has core responsibilities for establishing and maintaining the programs for the use of clinical and research radiation sources and for ensuring compliance with all applicable federal, state, and local regulations. The Medical Physics Department is responsible for ensuring the safe and proper functioning of diagnostic imaging equipment with specific regard to image quality. PI/PDs must receive authorization from the Radiation Safety Committee before conducting any experiments involving radioactive materials.

For Additional Information see:

[MPRS](#)

3.6 Chemical Safety

The Research Safety Division provides professional services to the laboratory community by evaluating the risk of chemicals in use, developing programs and procedures to assure that chemicals are used in a safe and healthful manner, and supporting compliance with all applicable federal, state, and municipal regulations. Of particular importance is the Chemical Hygiene Plan which outlines the policies, procedures, and safe work practices used while working with chemicals in laboratories at Boston University.

For Additional Information see:

[Chemical Safety](#)

3.7 Select Agents

Boston University's Select Agent Training program follows the guidelines set forth by the Department of Health and Human Services and the Department of Agriculture. Under these regulations, the Centers for Disease Control and Prevention (CDC) and U.S. Department of Agriculture (USDA) are required to regulate the possession of biological agents and toxins that have the potential to pose a severe threat to public health and safety. Boston University requires that all PI/PDs planning to work with any select agents be registered through the CDC. The Research Safety Division of Environmental Health and Safety manages the registration program for the University's IBC. Environmental Health and Safety and the IBC will determine whether select agents are involved in the proposed research. If so, in addition to IBC approval, the investigator must obtain approval from the University Responsible Official (RO) for the Select Agent Training program before ordering, shipping, storing, or working with any select agents.

For Additional Information see:

[IBC](#)

3.8 Controlled Substances

Federal and Massachusetts laws contain strict guidelines for the conduct of research with controlled substances (CS). Thorough record keeping, security measures, and prompt reporting when issues of inventory discrepancy arise are required for all aspects of receipt, use, storage and disposal. To ensure compliance with these regulations and make better use of its research and administrative resources, the Boston University CS Programs for both campuses have been revised and combined.

For Additional Information see:

[Controlled Substances](#)

3.9 Purchasing/Shipping Hazardous Materials and Other Restricted Items

The purpose of the Hazardous Materials and Waste Management Plan is to implement and monitor an ongoing program for the management of hazardous materials and

waste, which are defined as chemicals, chemotherapy drugs, radioactive materials, and biohazards, including sharps. This plan ensures that there is minimal risk to individuals, students, personnel, visitors, the community, and the environment. Training is provided as necessary for anyone shipping hazardous materials and other restricted items domestically or internationally.

For Additional Information see:

[Biosafety Manual](#)

3.10 Emergency Response Planning

The Office of Emergency Response Planning is a division of EHS that, in conjunction with the BU Police Department, is responsible for BU's comprehensive emergency plan management. Emergency responders are available from the Office of Research Compliance when a spill or accident occurs. In the event of an emergency in a laboratory environment, quick and decisive action is important. Accordingly, all individuals who work in laboratories are trained annually in appropriate general response procedures to various emergency situations. The "Health and Safety Procedures and Emergency Instructions" flipchart is provided to all laboratories to serve as a quick reference in the event of an emergency. This flipchart lists important phone numbers, contact information, and procedures for various laboratory emergencies, including: medical emergencies, fires, chemical, biological, and radiation spills, splashes to the body, and university-wide emergencies. In addition, there is information pertaining to campus-wide emergencies available from the Boston University Emergency website.

For Additional Information see:

[Chemical Safety](#) and [ERP](#)

3.11 Policy for the Review of Human Embryonic Stem Cell Research (hESC)

The Boston University and Boston Medical Center guidelines for the use of human embryonic stem cells(hESC) can be found [here](#)

3.12 Export Controls

BU faculty and staff must adhere to export control regulations that govern the distribution to foreign nationals and foreign countries of strategically important technology, services, and information, including equipment and technology used in their research activities. Boston University faculty and employees are expected to assess their own activities to determine whether they are covered by export control license requirements. This analysis turns on what materials and technology will be involved in the activity, who will be involved in the research, and the purposes for which the materials or results of the research will be used. Export control regulations apply to materials and information acquired or produced by the University and its research, as well as to materials or information supplied by a third party, such as a research sponsor.

Federal regulations may apply to the physical export of equipment and technology used in the course of research, and the transmission of information, either in the

U.S. or abroad. Transfer or use of certain technologies by foreign nationals in the U.S. is controlled by the same regulations that apply to shipments overseas. In many cases, University activities are exempt from export regulations. However, in some instances the University may need to secure a license before the PI/PD is permitted to transfer materials overseas, allow foreign nationals to access certain equipment, collaborate with a foreign company or research organization, hire a foreign consultant, or share research results with foreign nationals. These regulations are administered by the State Department (International Traffic in Arms Regulations), the Commerce Department (Export Administration Regulations), or the Treasury Department (Office of Foreign Assets Control regulations).

For Additional Information see:

[Export Control](#)

3.13 Minors in Labs

Under certain circumstances, minors may be authorized to work in research laboratories at Boston University.

For more information, please view the policy "Minors in Laboratories" located on the [ORC Committees Policies website](#).

Chapter Four

Sources of Project Support

The OSP maintains a collection of print and electronic resources to assist in identifying potential sponsors. In addition, BU subscribes to the Community of Science, a searchable database containing information about funding opportunities for thousands of sponsors.

For Additional Information see:

[OSP](#)

4.1 University Support

4.1.1 Limited Submissions and Internal Competitions

Some sponsors limit the number of nominations or proposals that BU may submit to a particular program. Procedures have been developed for selecting candidates for such awards, and announcements soliciting internal proposals are distributed by OSP. Generally, there is a deadline 30 days in advance of the sponsor's deadline to submit an abstract and estimated budget for consideration. Decisions are made on the CRC campus by the Vice President for Research and by the Associate Provost on the MED campus. Joint decisions are made when needed.

Most competitions are open to applicants from departments throughout Boston University. A few competitions are limited by the sponsors in the number of applicants or specialties that may be represented.

For Additional Information see:

[OSP](#)

4.1.2 Federal

Grants.gov has been established as a governmental funding resource as part of the government's Fiscal Year Management Agenda to improve services to the public. Grants.gov allows applicants for federal grants from NIH and certain other federal agencies to search and apply for funding through a common website. The Find Grant Opportunities feature enables applicants to search for federal government-wide grant opportunities and to receive notification of future grant opportunities. The Apply for Grants feature allows organizations to apply for federal grants online.

Some agencies such as NSF or the National Aeronautics and Space Administration (NASA) as well as other agencies have a similar mechanism for finding and applying for grants.

For Additional Information see:

[Grants](#)

4.1.3 Not-For-Profit Sponsors

A wide variety of private organizations including foundations and associations provide funding for research and training activities that are of interest to University faculty. Most organizations that support research have their own websites, a number of which are listed and linked through

commercial databases. BU subscribes to the Community of Science database—which is the most extensive—for faculty on both campuses. At times, both OSP and the Development and Alumni Relations offices are involved in proposal development and processing. Even if they are handled by the Development Office, sponsored programs proposals are required to be routed through OSP and must adhere to OSP policy, timelines, and other requirements. OSP and the Development Office will coordinate their activities for timely decision-making and submittal.

For Additional Information see:

[Funding](#)

4.1.4 Commercial Sponsors

The University encourages interaction between faculty researchers and their counterparts in industry. However, there are inherent conflicts built into these relationships that require attention. BU strives to ensure the freedom of dissemination of the results of its community's research, ownership of intellectual property including patents, management or elimination of conflicts of interest, freedom of choice in the selection of research topics and in the conduct of the research, and relevance to the educational mission of the University.

Commercial research relationships require a formal proposal including a budget that has been reviewed and approved by the appropriate department chair, dean, and OSP. Proposals must comply with applicable policies for the protection of human subjects, animal welfare, and compliance with radiation safety standards and conflict of interest disclaimers. Proposals for corporate support should provide for full recovery of costs including F&A costs (formerly indirect costs) at the full federally approved research rate unless conducted as a clinical trial. Terms and conditions of industry Sponsored Research Agreements (SRA) without licensing of existing intellectual property are negotiated by OSP.

OSP has developed preferred contracting language for research agreements between BU and industrial sponsors. While PI/PDs should be familiar with the policies of the University, OSP is responsible for negotiating terms and conditions. The University conducts research programs consistent with good scientific practices. Research results are not guaranteed.

PPI/PDs must be free to publish the results of their research without prior approval of a sponsor or third party. Sponsors will be permitted a short period to review publications prior to submission in order to identify and request the removal of sponsor confidential information or to identify intellectual property requiring protection. A short publication delay, generally no longer than 90 days in total, will be permitted to allow for such protection. Delays in publication of greater than 90 days will be permitted only in instances when it is necessary to protect public health and safety, such as in the case of multi-center clinical trials.

4.1.5 Industry-supported Clinical Trials

Industry-supported clinical trials are agreements between the University and various institutions in which the University agrees to test or monitor drugs, procedures, techniques, or devices that might be used for the treatment or diagnosis of patients. Considerations listed in the general outline of industrial agreements should be followed.

The University and sponsor liability/indemnification clauses should be part of a clinical trial agreement in order to address who bears the costs in the event of legal action by a third party. In addition to indemnification, the sponsor is normally expected to pay for any injuries to subjects that are the direct result of the study.

It is the policy of the University to maintain the confidentiality of patient medical records. The terms of a clinical trial agreement typically address confidentiality of research records, study records, and patient records, the latter being strictly confidential.

Inventions or discoveries made in the course of clinical trials that are directly related to the sponsor's study drug or device will normally belong to the sponsor.

4.1.6 Start-Up Sponsored Agreements

In some cases, BU faculty may have a financial interest or a board seat in a company, or the company may be based on technology licensed to it by BU. Such companies may wish to fund research at BU via subawards under Small Business Innovation Research (SBIR) or The Small Business Technology Transfer (STTR) award to the company or other agreements in direct support of research at BU. The same policies that apply to other commercial sponsors apply in these cases as well (see Section 4.1.4). However, important special considerations include whether any and all actual or potential conflicts have been appropriately managed; whether any students will be engaged in performing the research; and whether it is clear that BU space and resources are being used for the BU purposes only. Appropriate disclosure to and review by the Conflict of Interest Committee is required.

Chapter 5

Proposal Development

All sponsored research agreements must be evidenced by a formal written document that outlines the research objectives and administrative requirements of the project. Informal (oral) agreements are the personal responsibility of the individual faculty member making such arrangements and are not binding on the University.

The creation of a proposal for a potential sponsor for support of research or other scholarly activity is the responsibility of the PI/PD. Proposals are normally routed through the department and dean and forwarded to OSP for review and submission to a sponsor.

Key Sponsored Projects polices to be considered in preparing sponsored projects proposals include the following:

- Cost-sharing on Sponsored Projects
 - [Research](#) and Cost Sharing on the [OSP Forms webpage](#)
- [Effort Commitment](#)
- Charging of Administrative or Clerical Salaries – [Funding Information](#)
- Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects

5.1 Types of Proposals

Preliminary proposals, also known as pre-proposals, white papers, or letters of intent, may be requested by a sponsor to ascertain interest in a project. If the preliminary proposal or white paper makes a financial, space, or cost-sharing commitment, the proposal must be submitted through OSP.

New proposals are submitted for initial funding of a project. New proposals are either unsolicited or solicited.

Unsolicited proposals are investigator-initiated projects submitted to a sponsor but not in response to a specific solicitation. The area of activity should be of interest to the sponsor. Some new proposals are submitted for competitive review by the sponsor and peer review and may be announced through an **RFP (Request for Proposal)**, **RFQ (Request for Quotation)**, **RFA (Request for Application)**, **Funding Opportunity Announcement (FOA)**, or a **Program Announcement (PA)**. Proposals submitted in response to these specific work statements may contain specific terms and conditions and formatting requirements.

Continuation proposals are non-competing progress reports required to continue support for a subsequent budget period within an approved competitive segment.

Renewal proposals are requests for additional funding for a period subsequent to that provided by a current award. Renewal applications are subject to the same sponsor review criteria as new proposals.

Revised proposals are resubmitted in response to an indication by the sponsor that a project may be funded, but with the stipulation that specific changes in the proposal must be made. The revised proposal should carefully follow the sponsor

instructions with respect to the identification of changes made in response to the reviews of the original proposal.

Supplemental proposals request additional support of a funded project (e.g., equipment, support of undergraduate or minority investigators, programmatic modifications).

Consortium/Joint Proposals and Subcontracts are submitted for projects that will involve investigators from more than one institution. In general, one institution will be designated as the lead at the time of proposal submission. The lead institution accepts full funding and responsibility for the performance of the project from the sponsor. Subaward agreements are then negotiated to transfer part of the work and appropriate funds to the other participating institutions. Generally, all conditions imposed by the sponsor on the lead institution are also imposed on the subcontractor(s). All subcontracts, both to and from BU, are negotiated by OSP. When BU is the lead institution, OSP requires a statement from each participating organization that includes a budget and work scope, signed by an authorized institutional official. When BU is the subcontractor, the information (scope of work, budget, etc.) sent to the lead organization must be processed as a proposal through OSP.

5.2 Initial Contact with the Sponsor

A key element of successful proposal writing is establishing a relationship with the potential sponsor early on in the process. The purpose of this initial contact is to confirm the common areas of interest of the sponsor and the PI/PD. A contact at the funding agency can greatly facilitate writing the full proposal, as well as serve as a resource for answering questions. A PI/PD may initiate contact with technical personnel at a sponsoring organization to confirm research interests by a telephone call, office visit, letter of intent, or a preliminary proposal.

5.3 Registering as a PI/PD with Federal Agencies

The NSF, in its FastLane system, and the NIH, in its eRA Commons system, require principal investigators, project directors, and other personnel participating on a research project to be registered with the agency. Individuals seeking to register with either NSF or NIH should contact their OSP representative who is authorized to request either an ID number and password (NSF), or an eRA Commons account from the NIH. Since affiliations are institution-specific, faculty are reminded that—even if registered via one institution—an additional institutional affiliation or change of institution requires a new registration.

5.4 Proposal Preparation

The format or presentation of a particular proposal will depend on the requirements of the sponsor. Most sponsors have developed policies and procedures for the submission of proposals and may require the use of specific application forms or electronic web-based systems. Other sponsors may have less stringent format requirements. In any case, PI/PDs should obtain the most recent version of the sponsor's application guidelines and follow the required proposal format. Guidelines or urls should be forwarded to OSP along with the application for review well in advance of the due date of the proposal to facilitate timely internal review and processing. OSP reserves the right to withhold submission or to withdraw the application if the terms of the grant do not comply with BU policies.

It is a good idea, particularly for new investigators, to start the writing process months in advance of any expected due date. Estimates of the total time devoted to producing a new application may range from two to three months or longer. Revised applications and renewals usually take less time but are still a major effort that should not be underestimated.

5.5 Components of a Proposal

Whether submitted in paper or electronic form, most proposals may contain all or some of the following information:

- **Title Page** includes the title and duration of the project, amount requested, PI/PD information, and the authorized institutional contact (in most cases, OSP). In addition, it might include the sponsor's name, title of program or solicitation number, and place for appropriate signatures if not included elsewhere.
- **Abstract or Proposal Summary** describes the objectives, methodology, and significance of the proposed project. The abstract should be intelligible to someone who is not an expert in the field and it should be able to stand alone.
- **Introduction** frames the problem and concisely states the importance of the research or scholarly activity that is being proposed.
- **Research Plan** includes the specific aims, background and significance, preliminary studies, and research design and methods.
- **Bibliography** includes published material which helps frame the importance of the activity and helps the reader to understand the current stage of development of the research or the scholarship that has previously been developed.
- **CV/Biographical Sketch** should be submitted in the format required by the sponsor.
- **Use of human subjects and animals, radioactive materials, blood borne pathogens, hazardous chemicals, recombinant DNA, and select agents.** In some cases a proposal may be submitted while these reviews by

the institutional committees are pending. However, in no case will research be permitted to proceed without proper approval.

- **Budget and Budget Justification** should reflect a reasonable estimate of the expenses necessary to conduct the project. (See Chapter 6: Budget Development)
- **Current and Pending Support** outlines all awards and pending proposals for all key personnel. This includes all financial resources, including federal, non-federal, commercial, or institutional that are available in direct support of an individual's research endeavors, including but not limited to research grants, cooperative agreements, contracts, and/or institutional awards. Prizes or gifts do not need to be included. In some cases one must detail the amount of time available to carry out the proposed activities.
- **Facilities and Resources** describes equipment or other relevant resources including space, library resources, animal facilities, and core facilities that will be available to the project.
- **Letter of Support:** Other letters of support, if required, should be included in an appendix.
- **Transmittal Letter** should be included if a form asking for an institutional signature is not provided or required by the sponsor. Unless otherwise indicated these are prepared by the OSP.

5.6 Helpful Hints & Resources

Information is available on the OSP websites that may be helpful to PI/PDs in preparing proposals, including templates for the most recent fringe benefits, graduate student tuition, and F&A (indirect cost) rates.

For Additional Information see:

www.bu.edu/osp/proposal/index.html (CRC)

<http://www.bu.edu/osp/contact-us/> (MED)

It is particularly important to adhere to agency format requirements, page limitations, and requirements for the inclusion of appendix materials, and the format and content of the proposer's relevant publications.

Chapter 6

Budget Development

The budget in support of a sponsored project should follow a sponsor's requirements, but will most often require line item detail, except for NIH modular grant proposals, which are described in section 6.3 below.

6.1 Principles of Sponsored Project Support

The majority of externally sponsored funding at BU is provided by the federal government. Cost accounting principles for higher education awardees are established by the Federal Office of Management and Budget (OMB). The OMB circulars that are most relevant to universities include the following:

[OMB Circular A-21 \(now 2 CFR 220\)](#): *Cost Principles for Educational Institutions*. This circular establishes principles for determining direct and F&A costs applicable to grants, contracts, and other agreements with educational institutions. OMB Circular A-21 notes that costs may be charged directly to sponsored projects if expenses meet the following criteria:

6.1.1 Reasonableness: The nature of the expenditure and the amount are prudent under the circumstances.

6.1.2 Allocability: The expenditure provides a direct benefit to the project (i.e., the cost of a piece of equipment that is required to accomplish the work of two projects may be proportionately shared by those projects).

6.1.3. Consistency: Costs incurred for the same purpose in like circumstances are treated consistently as direct or F&A (indirect) costs across the institution.

6.1.4 Allowability: Costs conform to any limitations or exclusions as set forth in OMB Circulars.

Examples of unallowable costs under federal sponsorship include: alcoholic beverages, entertainment costs, and most memberships. Costs that do not meet all of the above criteria may NOT be charged to federal awards. Non-governmental sponsors may apply different cost principles. Investigators must read the sponsor instructions carefully and consult with the OSP offices for further advice.

For Additional Information see:

<http://www.bu.edu/cfo/post-award-financial-operations/resources/university-policies/>

[OMB Circular A-110 \(now 2 CFR 215\)](#): *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and other Non-Profit Organizations*. This circular sets forth the minimum administrative requirements to which educational institutions must adhere. Individual federal agencies are required to implement OMB Circular A-110 as individual agency regulations. Examples are the NIH Grants Policy Statement or the NSF Grant Policy Manual.

[OMB Circular A-133](#): *Audits of Institutions of Higher Education and Other Non-Profit Institutions*. This circular establishes audit requirements and defines federal responsibilities for implementation and monitoring of institutions of higher education receiving federal awards.

6.2 Developing a Proposal Budget

With the exception of NIH Modular Budgets (see section 6.3 below), the proposal budget should delineate the entire cost of a project and accurately reflect costs that are necessary to complete the work. The budget should reflect the methodology described within the proposal narrative. Reviewers should be able to determine whether sufficient funds are being requested to complete the project successfully and that those requests are reasonable given the scope of work. Accuracy and detail are essential in this section. PI/PDs are encouraged to follow a sponsor's guidelines exactly and provide information in the precise format as specified. Departmental business office personnel and the OSP staff are available to assist investigators in developing budgets that are consistent with University policy and agency requirements.

6.3 NIH Modular

The NIH has instituted budgeting guidelines for many of its applications. Under these guidelines, for application of \$250,000 or less of direct costs, no detailed budgets are provided to NIH, although details on personnel and subcontracts are provided in a budget justification. Amounts requested per year cannot (currently) exceed \$250,000 in direct costs and funding must be requested in \$25,000 increments. PI/PDs should remember to budget for future year inflationary increases. NIH provides instructions on how to average costs over the years of the award to provide for such increases, as well as one-time purchases, such as equipment. No detailed budgets are required at any level during the review process, but PI/PDs are responsible for accurately completing the budget justification.

For Additional Information see:

<http://www.bu.edu/osp/proposal-preparation/budget-development/>

6.4 Major Budget Categories for Non Modular Budgets

Most non-federal sponsors require line item budgeting. The major budget categories include the following:

6.4.1 Direct Costs

Direct costs are those costs that can be directly attributed to carrying out the work of the proposed project, and may include the following:

6.4.1.1 Personnel Costs should include only BU personnel. Collaborators at other institutions should be included either as consultants or within a subaward budget. Proposed salaries should be in accordance with approved salary scales and position grades, and the budget should reflect the actual person months or percent effort that is anticipated. In developing multi-year project budgets, salary increases should be

considered (consult with OSP to determine the appropriate escalation factor). Some sponsors have salary caps, or limitations on the amount of salary that may be charged to a grant. Check with OSP for current limitations.

Personnel costs included in proposal budgets should be based on institutional base salary. This is salary paid by BU for work performed in accordance with the faculty's letter of appointment and excludes clinical bonuses and extra compensation.

Note: Faculty working at the University under a Memorandum of Understanding (MOU) between BU and the Veteran's Administration (VA) do not include the salary received from the VA as a VA employee as part of the total compensation when calculating institutional base salary and applicability of the salary rate cap.

6.4.1.2 Fringe Benefits include such items as health insurance, retirement benefits, and Social Security and Medicare. BU's fringe benefit rates are negotiated with and approved by BU's cognizant federal agency. The rate must be charged to the grant in relationship to the salaries and percentage of effort committed to the grant.

For Additional Information see:
[Proposal Preparation Information](#)

6.4.1.3 Consultants are provided only for tasks where on-campus technical expertise does not exist or is not readily available. Consultants are not considered to be employees of the University and should be accounted for separately in the budget. Some sponsors limit the rate at which consultants can be paid. Generally, consultants are paid a fee plus travel and other expenses. Some sponsors do not permit payments to consultants, and some restrict or limit such payments. If in doubt as to the allowability of or rates paid to consultants, check the sponsor's program literature or contact OSP. Conflict of interest and nepotism issues sometimes arise in the hiring of consultants. Care should be taken to comply with institutional policies on the hiring of relatives as consultants.

BU is finalizing revised procedures for determining when an individual may be treated as an independent contractor (consultant) and when that individual must be placed in an employee position. In addition, a standard contract, contract amendment, and invoice have been developed for use with consultants.

For Additional Information see:
Under Development

6.4.1.4 Graduate Students

CRC

Graduate students should be budgeted at the standard salary level set annually by GRS/ENG. For 2010-2011, the eight-month stipend level has been established at \$18,200 (\$27,300 for 12 months). Engineering increases this amount by 5% for post-comprehensives and 10% for post-prospectus students. Fringe benefits on graduate student salaries should be budgeted at the applicable graduate student rate. Please refer to the [Proposal Preparation Information](#) page for specific rate information. Under the guidelines of the Graduate Research Assistant Support Program (GRASP), in order for graduate students to qualify for a full tuition scholarship the grant or contract providing the salary support must carry the

University's full Indirect Cost (IDC) or F&A rate, or at the rate accepted by OSP for foundations or other not-for-profit entities. GRASP funding in the future may be available for students supported from internal BU funds. GRASP tuition scholarship support is available for BU graduate students supported on a qualified CRC sponsored program and any CRC student supported on a qualified BU sponsored program. The program is administered by the Graduate School of Arts and Sciences.

MED

At BU-MED, graduate students are currently budgeted at \$30,500 for 12 month pay. This stipend is increased by \$1000 (to \$31,500) for students who have passed their qualifying examinations. Effective July 1, 2011, the University will be employing a fringe benefit rate for certain populations of graduate students on the Medical Campus. Please refer to the [Proposal Preparation Information](#) page for specific rate information.

6.4.1.5 Equipment needs should be itemized and justified. Most sponsors rely on the University's definition of "capital equipment" to differentiate between equipment and supply categories. At BU, the equipment capitalization threshold is \$5000 per item of equipment with a useful life of one year or more. Whenever possible, estimated costs should be based on catalog prices or written quotations, copies of which should be included with the proposals.

6.4.1.6 Materials and Supplies includes all consumable materials including the purchase cost of animals as well as small items of equipment that do not meet the threshold for "capital equipment." Each item or group of items should be listed and carefully justified. Federal sponsors do not allow general office supplies or equipment unless their use can be specifically justified because the project qualifies as a "major project" under OMB Circular A-21.

6.4.1.7 Travel must be justified on the basis of its benefit to the project being proposed. Travel expenses may include trips to professional meetings, fieldwork, and meetings required by sponsors. Allowable costs include meals, lodging, airfare, and ground transportation. Local travel related to subject recruitment and interviews is also allowable. Some sponsors limit per diem reimbursement rates, modes of travel, foreign travel, etc. For all federally sponsored travel, the use of U.S. flag carriers is required. In the case of allocating costs to two or more awards, care must be taken to allocate based upon the benefit received by each award.

For Additional Information see:

- [University travel information](#)
- [GrantsPAS](#)
- Page 12 of the following link: [Travel Guidelines](#) (also see the [BU Travel website](#))
-

6.4.1.8 Patient Care Costs for inpatient or outpatient participants in a research study are allowable. Expenses directly attributable to research (e.g., research nursing, assays, etc.) are not considered patient care costs and should be included in other appropriate budget categories. Care must be taken to avoid double billing to the research project and the patient's payers (e.g. Medicare, Health Plan) account.

6.4.1.9 Alterations, Renovations, and Construction Costs are rarely allowable on research grant proposals. Any exceptions must be fully justified, and it is strongly recommended that specific needs be discussed in advance with OSP and the sponsor.

6.4.1.10 Other Direct Costs may be used for other project expenses that do not fit into the above classifications. Examples include: publication costs, human subject participation fees, repair and maintenance of equipment, rent and utility expenses, animal housing, machine shop charges, communication costs, tuition (non-federal projects), and some types of telephone service (e.g., long distance, toll charges).

6.4.1.11 Subcontracts/Subawards are agreements by which some scientific or programmatic aspects of a grant, contract, or cooperative agreement made to BU are contracted out to another organization. The sub-recipient is expected to work with great autonomy and take full responsibility for its portion of the work. However, the BU PI/PD still bears the ultimate responsibility for the programmatic progress and financial oversight of the award. This level of independence and participation in the development and execution of the project distinguishes a sub-recipient from the provider of a purchased service (vendor). The primary proposal submitted to the sponsor must include evidence of commitment from the subcontractor, if the sub-recipient has been identified, as well as a statement of work and proposed budget. OSP will require evidence of the agreement of the sub-recipient institution before approving a proposal submission. Sponsor guidelines may vary; consult OSP for a discussion of typical requirements. In addition, OSP will issue to proposed subrecipients, with whom the University has no other active awards, the "Subrecipient Prequalifying Questionnaire" prior to issuing a formal subaward.

For additional information, please refer to the "Subrecipient Agreements" section of the [Post Award Policies](#) page.

6.4.1.12 Costs of Special Audits

If the sponsor requires the conduct of an audit not subject to federal OMB Circular A-133, the cost of that audit report must be requested in the budget.

6.4.2 Facilities and Administrative Costs (F&A)

Facilities and Administrative (F&A) costs are costs that are not readily identifiable with individual projects, and are also called overhead or indirect costs (IDC). They include: library operations, utility costs, depreciation of buildings and equipment, operations and maintenance costs, grant and contract administration and accounting, and general administrative expenses for central offices such as the President, Provost, Human Resources, and Purchasing. On the CRC, the Provost or VP for Research makes the final decision on whether F&A costs can be waived or reduced; on the MED campus, that decision is made by the OSP director in consultation with the Provost and AVP.

For Additional Information see:

[Budgeting Fringe Benefits](#) and BU F&A Policy found on the [OSP Policy webpage](#)

6.4.2.1 Federal F&A Rates

Boston University's Federal Facilities and Administrative costs (F&A) rates are established through negotiations with the U.S. Department of Health and Human Services. These rates are fixed for a specified period of time and should be used for all grant or contract applications to sponsors, unless there is a restriction prohibiting indirect costs or designating another rate for a special program.

Rate determinations are based on "predominance of effort" when there may be more than one site involved and work is being performed on-campus and off-campus at locations remote from BU, as in the case of field work. When more than 50% of the work is performed off-campus, the off-campus rate is used for the entire project. When more than 50% of the work is performed on-campus, the on-campus rate is used for the entire project.

Indirect costs are charged to a project by applying a percentage to the total direct costs of the project. In some instances the total direct cost may be modified to exclude capital equipment (any non-expendable equipment estimated to cost \$5,000 or more and with a useful life of one year or more), rent and utilities, tuition costs, patient care expenses related to "standard of care" (the cost for in-patient and out-patient care, but not payments to human subjects), graduate research assistant tuition costs charged directly to the project, and subcontract expenditures in excess of \$25,000. This rate is known as the Modified Total Direct Cost rate (MTDC). In addition, other sponsor and/or award-specific restrictions may also apply. If a project is carried out in space leased by the University and the rent is charged to the grant or contract, the off-campus rate is applied. Otherwise, if the lease is capitalized by the University, the on-campus rate will be applied.

For Additional Information see:

[Proposal \(CRC\)](#)

6.4.2.2 Non-Federal Overhead Rates – Non-Profit Organizations

For non-federal agencies such as the American Cancer Society and similar non-profit organizations, generally if a sponsor has a written policy that limits the allowable rate of indirect costs, BU will accept these rates (see Section 6.4.2.3 below).

6.4.2.3 Waiver or Reduction of Overhead

Assessment of indirect costs to a sponsored project allows BU to recover some of its contribution to the support of the project. Therefore, assessment waivers are rarely given except in exceptional circumstances. Waiver requests should be directed to the OSP Director using the form provided in the waiver policy.

Request for Reduction/Waiver of F&A on the [OSP Forms and Worksheets webpage](#)

6.5 Clinical Trial Budgeting:

Clinical trial budgets should reflect all of the projected costs that the department expects will be directly or indirectly associated with the conduct of the trial.

6.6 Cost-Sharing and Matching Funds

The portion of the total sponsored project costs not funded by a sponsor is considered to be "cost-sharing." University policy discourages voluntary committed cost-sharing when submitting proposals to an external sponsor and expects that all proposal submissions include only the minimum amount of cost-sharing necessary to meet the sponsor's requirements. For most sponsors, cost-sharing is not a requirement in order to receive the award.

There are several types of cost-sharing: mandatory, voluntary committed, voluntary uncommitted, or in-kind/matching. Mandatory, voluntary committed cost-sharing, and in-kind/matching must be identified, administered, and accounted for

consistently throughout the University. Cost-sharing can also be provided in the form of salary and accompanying benefits (effort devoted to a sponsored project), materials and supplies, or even by the waiver or reduction of F&A costs. Provided below are detailed definitions of the types of cost-sharing with some common examples.

6.6.1 Mandatory Cost-sharing

Mandatory cost-sharing is funding that requires a university contribution toward the project as a condition of receiving the award. Mandatory cost-sharing may be a specific dollar amount, or cited as a percentage of the costs requested from the sponsor, or the amount may not be specified.

6.6.2 Voluntary Committed Cost-sharing

Voluntary committed cost-sharing is a cost associated with a sponsored project and supported with university and/or other non-sponsored funds that were identified in the proposal but were not required or funded by the sponsor. Some common examples include the following:

- A percentage of effort of faculty or senior researchers included in a proposal budget or stated in the text of the proposal for which no compensation or only partial compensation was requested.
- The purchase of equipment for the project, identified in the proposal, for which no funds or only partial funds were requested.

6.6.3 Voluntary Uncommitted Cost-sharing

Voluntary uncommitted cost-sharing is a cost associated with a sponsored project that was not committed in the proposal or in any other communication to the sponsor. This includes effort of faculty or senior researchers that is over and above that which is committed and budgeted for in a sponsored agreement. Some common examples include:

- Donated faculty effort on a sponsored project over and above the effort identified in the proposal or award.
- Academic year effort on a sponsored project for which only summer salary was proposed, if the effort was not listed either on the budget page or described in the body of the proposal.

Voluntary uncommitted cost-sharing should not be reported on time and effort sheets.

6.6.4 In-kind/Matching

Some sponsors that award funds to a university insist that those funds be matched in some proportion with funds from another party, either from the university or another sponsor. Matching may be in the form of actual cash expenditure of funds or may be an "in-kind" match, which is the value of non-cash contributions to the project. In-kind or matching contributions made by a party other than BU require documentation from that third party supporting the use of the funds as in-kind/matching and may require a certification of fair market value. How third party matching may be valued as cost-sharing is described in OMB Circular A-110, section .23.

6.6.5 Voluntary Committed Cost-sharing Approval

As defined above, voluntary committed cost-sharing is a cost associated with a sponsored project that was identified in a proposal but was not required or funded by the sponsor. The University does not typically cost share on a voluntary basis, consistent with its objectives of receiving fair compensation from sponsors for

research and scholarly activity conducted at the University. A voluntary commitment of sponsor-uncompensated effort and/or other types of commitment should be made only where the competitive circumstances or perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant the commitment. Approval for voluntary committed cost-sharing must be obtained from the Provost or VPR on the CRC campus, and the Director of OSP on the MED campus.

6.6.6 Mandatory Cost-sharing and In-Kind/Matching Approval

Some sponsors may include a requirement for the University to cost-share and/or provide in-kind contributions or matching funds to a sponsored project in their program announcement. This requirement is rare and can be costly to the University. Approval must be obtained from the school or college dean and the relevant campus provost prior to the preparation of the budget and budget justification. The signature of the department chair on a proposal transmittal sheet for a proposal indicates approval of any voluntary commitment to cost share effort.

6.7 Representations and Certifications

For some proposals, special representations, certifications, and acknowledgments may be required. OSP will complete these forms and provide appropriate signatures.

Chapter 7

Proposal Review, Approval, and Processing

7.1 Required Review and Signatures

No application may be submitted to any external sponsor without the prior approval of the University. The signature of the institution's authorized official (AO) is necessary to indicate University compliance with sponsor and government regulations, acceptance of responsibility for the administration of the sponsored project—including the provision of adequate facilities and services—and for compliance with applicable University policies and procedures. Authorization may also represent pre-acceptance of terms and conditions of an award unless exception is taken at the time of proposal submission.

For the most up-to-date list of authorized signatories, please see the Authorized Signatories for BU Sponsored Programs heading on the [PAFO Post Award Policies page](#).

7.2 Procedures for the Submission of Proposals

Proposals should be routed through the PI/PD's departmental business office before being sent to OSP. Five (5) working days should be allowed for review, correction (if needed), and transmittal prior to the deadline. Electronic applications are held to the same standards and policies as those submitted in paper formats. All proposals submitted to OSP for review and submission to a sponsor, regardless of method, must be accompanied by the OSP Proposal Summary Form and any other necessary internal paperwork. This form must be signed by the PI/PD and his chair/school dean as well as any additional co-PI/PDs and their chairs/deans.

For Additional Information see:

[Deadlines for Research Applications](#), [Proposal Submission Process](#), and [Proposal Summary Form](#)

7.3 Transmission of Proposal to Sponsor

7.3.1 Paper Submissions

If submitted in paper format, the entire completed proposal, including budget, justification, investigator bios, curriculum vitae, other support information, and cover/signature pages must be submitted to the appropriate OSP office at least five (5) working days in advance of the sponsor's deadline to permit appropriate review. A copy of the application guidelines or website address where the information can be accessed should also be appended. PI/PDs will be notified when their proposal has been approved and signed. PI/PDs and departmental staff are responsible for the copying and mailing of paper applications.

7.3.2 Electronic Submissions

Proposals that must be transmitted electronically via NSF FastLane or Grants.gov must be reviewed and approved before submission to the sponsor. Other systems (e.g., U.S. Dept of Education, American Cancer Society) do not allow electronic access for institutional review. In these cases, a copy of the proposal must be furnished to OSP for review and approval prior to submission by the PI/PD. In either case, the proposal must reach OSP at least five (5) working days in advance of the sponsor's deadline to permit appropriate review. A copy of the application guidelines or website address where the information can be accessed should also be provided. In addition, a copy of the completed Proposal Summary Form and attachments must be provided to OSP.

Most federal sponsors require electronic submission of proposals via sites such as Grants.gov, NSF's Fastlane system, NASA's NSPIRES system, DOE's FedConnect system, or the Department of Education's E-Application systems, among others. These sites require that OSP staff review and submit the application online. Additional information about PI/PD registration for these systems, as well as application preparation, can be obtained at the link below.

For Additional Information see:

[Electronic Submissions](#)

Some non-federal sponsors also require electronic submission. In certain cases, these systems are designed in a way that prohibits electronic access by anyone other than the PI/PD. In this situation, the PI/PD must provide a hard copy of the proposal to OSP for review and approval prior to submission.

7.4 Deadlines

Sponsor deadline requirements vary widely, and investigators need to read carefully and understand the deadline terminology used by the sponsor. For example, a receipt deadline is the date by which the sponsor must receive the proposal while a postmark deadline means that the proposal must be postmarked by the date. In most cases, a proposal will not be considered if it misses the agency deadline. Any questions should be directed to OSP for clarification. The deadline date for proposals where the prime award is to BU is the sponsor's deadline. If the prime award is to another school and BU is a sub-recipient, the BU deadline is five (5) days earlier than the prime's deadline or the deadline set by the other institution, if earlier.

For additional information see:

[Deadline Policy](#)

7.5 Pre-Award Audit/Additional Information

Some sponsors may require additional proof or supporting materials to document a proposed budget prior to award. PI/PDs should maintain a file of all supporting

materials used in the development of a project budget. Examples of items that should be retained include copies of all price quotes for equipment, documentation of all travel costs, animal care costs, etc.

A sponsor may wish to support a proposed project at a reduced level of funding. If requested, a revised budget should be submitted to OSP for review and submission. Unless the revision imposes additional cost-sharing or space requirements, or significantly affects the proposed F&A recovery, there is no need to submit the proposal through the same approval channels as the original proposal. Reductions in proposed budgets should be evaluated to determine whether there is a change in the PI/PD's level of effort or to the scope of work. PI/PDs should not negotiate directly with external sponsors, and if contacted directly by a sponsor regarding the terms of an award under discussion, they should refer the sponsor to the appropriate OSP officer.

A sponsor may wish to support a proposed project at a reduced level of funding. If requested, a revised budget should be submitted to OSP for review and submission. Unless the revision imposes additional cost-sharing or space requirements, or significantly affects the proposed F&A recovery, there is no need to submit the proposal through the same approval channels as the original proposal. Reductions in proposed budgets should be evaluated to determine whether there is a change in the PI/PD's level of effort or to the scope of work. PI/PDs should not negotiate directly with external sponsors, and if contacted directly by a sponsor regarding the terms of an award under discussion, they should refer the sponsor to the appropriate OSP officer.

7.6 Proposal and Award Tracking

OSP maintains databases of all applications submitted and awards received from external funding, as well as the files of record for official grant and contract award documents. All original award notices and any other sponsored project-related documents must be sent to OSP. PI/PDs should keep copies for their records.

7.7 Site Visits

For large applications, sponsors may wish to visit the University to meet with those who will be responsible for the conduct and administration of the proposed project. The visits can vary from brief meetings to discuss the specifics of the science to multi-day reviews by a team of outside experts who will evaluate all aspects of the proposed work and the University environment that is available to support it. OSP must be notified of any proposed site visit. The office staff can assist in preparing for these visits and will be available to meet with members of the site visit team. In order to save on their travel budgets, some sponsors hold "reverse" site visits where the PI/PD and other key personnel are invited to meet agency representatives at the sponsor's headquarters.

7.8 Protection of Confidential or Sensitive Proposal Information

Proposals may contain sensitive information, including both personal and scientific materials that the PI/PD may not wish to have distributed publicly. Federally funded

applications are a matter of public record and must be made available as stipulated by governmental regulations for audit and review. PI/PDs will be notified of any requests for access under the Freedom of Information Act (FOIA) and will be provided an opportunity to review the application for any information that may be withheld under applicable law. Proposed responses to FOIA requests should be reviewed with the OSP before submitting the responses. Most private sponsors also have audit and review requirements as conditions for acceptance of their funding. Any questions about inclusion of proprietary or other confidential information should be referred to the appropriate OSP office.

7.8.1 Labeling of Proprietary Information

Pages of an application should be labeled as proprietary and confidential if they would otherwise disclose information that is pending patent protection. The OSP will provide information on how to label the cover page and appropriate pages in the application.

Chapter 8

Award Acceptance

8.1 Types of Awards

An award is most broadly defined as financial support for a specific research project, training program, equipment purchase, or other activity. The federal government defines three types of awards: Assistance awards (including both grants and cooperative agreements), Contracts, and Other Transaction Agreements. Each is described below.

8.1.1 Grants are funds to support specific projects in which the sponsor has an interest but does not play an active role. Typically a grant is given without expectation of delivery of a specific product or service other than a final written report. Grants are written documents with general terms and conditions that usually stipulate a project period and minimal reporting requirements. They generally fund basic research, fellowships, and training.

8.1.2 Contracts provide support for a specific, often narrowly focused, set of tasks for the direct benefit of the sponsor and are written documents enforceable by law, typically with terms spelled out in greater detail than in a grant. The University is generally given less latitude to modify aspects of the scope of work and the budget than in the case of a grant. Contracts typically fund applied research, clinical trials, and services by the University.

8.1.2.1 Subawards/Subcontracts are awards issued to BU under a prime award (grant, cooperative agreement or contract), where a portion of the scope of work is delegated to BU by the prime awardee.

8.1.3 Cooperative Agreements create a collaborative relationship between BU and the sponsoring agency, which is often substantially involved with the project. The University does not have much latitude to modify the scope of work, and the reporting requirements are usually strict.

8.1.4 Other Transaction Awards are funding instruments which do not incorporate the standard terms and conditions included in A-21, A-110, or A-133. Rather, all terms and conditions are negotiated between the federal sponsor (currently only the Department of Defense and the NIH are legally authorized to award OTAs) on a case-by-case basis.

8.2 Receipt of Award

BU requires that all sponsored awards be reviewed and accepted by OSP on behalf of the University. Important points to be considered in a notice of award are the following:

- **Period of Performance:** In addition to noting the total period of performance, different sponsors may distinguish a current authorized funding period within the total period of performance.
- **Name of Key Personnel:** The PI/PD is responsible for conducting the project in accordance with University policies and sponsor requirements. However, other named key personnel may carry additional reporting and training requirements.
- **Dollars Committed and/or Obligated.** Not all project funds may be released at the beginning of the project but may be obligated incrementally. The sponsor is not legally bound to pay dollars not yet obligated.
- **Future Year Commitments:** These funds are contingent on their availability and on satisfactory progress on the project. These amounts are to be used for planning purposes only.
- **Cost-sharing:** If the sponsor requires the University to contribute its own resources to the project (i.e., mandatory cost-sharing) the requirement is included as a condition of the award. The University is responsible for documenting committed cost-sharing and reporting it to the sponsor.
- **Accounting and Reporting Obligations:** Virtually all awards require technical and financial reports. Most awards also require invention and property reports.
- **Deliverables:** Under some contracts, the University must deliver specified work products to the sponsor.
- **Payment to University:** Awards specify how the University will be funded or reimbursed by the sponsor.
- **Special Terms and Conditions:** The award may have additional terms and conditions that may specify limitations on availability or use of funds, need for prior approvals, and similar oversight by the awarding agency. It is critical to understand these restrictions before incurring costs. Both the PI/PD and the responsible business office must take note of these conditions.

8.3 Requesting and Modifying a Sponsored Project

Generally, the event that formally initiates the sponsored award and project cycle is the submission of a proposal to OSP. This office is responsible for approving and submitting proposals, and for information related to funding as provided by external sponsors. OSP also reviews and accepts the terms and conditions of sponsored contracts and agreements on behalf of the University. Requests for setting up or modifying a sponsored project should be directed to OSP.

8.4 Negotiation/Acceptance

OSP is responsible for reviewing all terms and conditions of an award before acceptance to ensure that the sponsor's requirements are compatible with BU's policies and procedures. Since a sponsored award binds both the sponsor and Boston

University to certain commitments, it is important that the terms are clearly understood and that all concerns are resolved before the award is accepted. A sponsor that contacts a PI/PD directly regarding the terms of an award under discussion should be referred to OSP.

8.5 Signature Authority

Many awards require the signature of an authorized institutional official to accept formally the terms and conditions of the award. OSP is responsible for providing the appropriate institutional signature. Investigators are cautioned not to sign University agreements for sponsored support, patents or copyright licenses, biomaterials, equipment loans, materials transfer, or clinical trials. These agreements bind the University to certain obligations and, as such, can be signed only by those who have delegated signature authority from the Board of Trustees through the President and senior University officers. For the most up-to-date list of authorized signatories, please see the Authorized Signatories for BU Sponsored Programs heading on the [PAFO Post Award Policies](#) page.

For Additional Information see:

[Post Award Policies](#)

8.6 Account Set-Up

OSP is responsible for setting up awards and communicating source #'s. Accounts are setup within 5 days of award receipt or as applicable, the final execution of agreement with the sponsor.

8.7 Pre-Award/Late Award Account Set-Up

Pre-award costs are permissible under most federal grants and allow the institution to incur certain costs up to 90 days in advance of the actual award start date, or in advance of delayed receipt of an award. A request for approval of pre-award costs may be made by the PI/PD or the department by submission of a completed IPAS Form that has been signed by the PI/PD and by the department chair or dean. In the event that the award is not forthcoming, the department or school will be responsible for any pre-award costs incurred. Requests for pre-award accounts should be directed to OSP. Pre-award cost for contracts may not be institutionally approved; however, the contracting agency may authorize pre-contract costs if negotiated by OSP and accepted by the agency.

For Additional Information see:

[Award Administration](#)

Chapter Nine

Post-Award Administration

The following Sponsored Projects policies are of direct relevance to the Administration of sponsored projects awards:

- [Post Award Financial Operations Resources](#)
- [Post Award Policies](#)

9.1 Financial Management

The tasks associated with the financial management of externally sponsored funds may be divided into three very broad categories:

- Activities that bring the awarded funds into the institution.
- Activities associated with the management of those funds while they reside in University accounts.
- Activities that support the expenditure of sponsored funds.

Based on the sponsor's guidelines, the PI/PD, with assistance from OSP, identifies the flexibility of budget categories, including restricted or prohibited budget categories, and notes the schedule for filing financial or technical reports with the sponsor. The process of managing sponsored activity funds is a shared responsibility between the PI/PD, the departmental administrator, OSP, and PAFO, and each has discrete areas of responsibility:

- The Office of Sponsored Programs serves as the primary administrative liaison between PI/PDs, departments, sponsors, the Provost, and other University offices in the post award period regarding award-specific sponsor guidelines and regulations.
- Post Award Financial Operations
 - prepares required financial reports;
 - manages the billing and collection of sponsored program funds;
 - maintains accounting records for each sponsor;
 - monitors overspending;
 - assists in final determination of cost allowability;
 - coordinates government, private sponsor, and public accounting firm audits;
 - develops and negotiates federal facilities and administrative and fringe benefit rate agreements;
 - administers government property accounting inventory;
 - conducts space function and departmental administration surveys;
 - reviews and approves calculated rates for Service Centers.

The following Sponsored Projects Policies are of direct relevance to the Financial Management of sponsored projects: [University Policies](#)

9.2 Personnel

Appointments of all personnel to sponsored projects are subject to the Human Resource policies of the University. Payment of all personnel is effected through the University's Personnel/Payroll System and is administered in the departmental/college business office.

9.2.1 Faculty and Staff Salaries

A research project should be charged with a portion of each employee's institutional base salary equal to the portion of time or effort devoted directly to the project unless an approved portion is "cost shared" by the University. For a faculty member with a nine-month appointment, one month of effort is one-ninth of his/her academic year salary. Salary increases can be charged proportionally to the project if they can be accommodated within the project budget.

9.2.2 Summer Salaries

Most sponsors will provide for compensation of faculty members with nine-month salary bases during the summer months at their regular University salary rates when included as part of the project proposal. Submission by the University of a proposal that provides for summer salary does not imply a University commitment to pay such salaries in the event that the sponsor does not provide for summer salary in the project award.

9.2.3 Additional Compensation

Project funds may not be used to increase the regular compensation of the PI/PD or other University staff members. Additional compensation, when provided, is subject to the policy in OMB Circular A-21, section J.10.

9.2.4 Graduate Research Assistants

CRC

Graduate students should be budgeted at the standard salary level set annually by GRS/ENG. Adjustments may be made for post-comprehensive and post-prospectus students. Fringe benefits on graduate student salaries should be budgeted at the applicable graduate student rate. Please refer to the [Proposal Preparation Information](#) page for specific rate information.

MED

Effective July 1, 2011, the University will be employing a fringe benefit rate for certain populations of graduate students on the Medical Campus. Please refer to the [Proposal Preparation Information](#) page for specific rate information.

9.2.5 Postdoctoral Associates

Postdoctoral Associates must be paid as employees of the University. Stipends are specifically unallowable on NIH research awards (the R, S, U, N, and P series).

9.3 Post-Award Changes and Approvals

Frequently, projects change or evolve from how they were first proposed to or funded by a sponsor. Many changes that occur in the conduct of sponsored projects require prior written approval from the sponsor. The level at which approval may be granted depends upon the type of award and the sponsor's specific policies governing the award.

9.4 Re-budgeting of Funds and Prior Approval

During the conduct of the project, the PI/PD may determine that budget changes are necessary. Many sponsors allow flexibility in how project funds are expended and permit budget changes as needed to meet project requirements. PI/PDs need to be aware of the specific requirements for their awards and to request prior approval for budget changes when necessary. Some grant awards allow budget changes to be managed at the institutional level. However, significant changes to a budget almost always require prior approval by the sponsor, as do changes in the objectives or scope that significantly alter an original statement of work. Actions that may be considered a change of scope include the following:

- Substitution of one animal model for another.
- Any change from the approved use of animals or human subjects.
- Applying new technology.
- Transferring the performance of substantive programmatic work to a third party.
- Absence or change of key personnel may require the prior approval of the awarding agency and is normally required for any absence of the PI/PD for a period of three (3) months or more. A substitute PI/PD may be named or the award may be relinquished. In general, changes in key personnel named in the notice of grant award whose expertise is critical to the approved project must also have prior approval.
- Foreign travel may require special review, even when it has been included in the initially approved budget.
- Issuance of subcontracts or sub agreements not included in an original proposal.

Any request for modification sent to the sponsor must be in writing and must be reviewed and countersigned by OSP. Some sponsors require prior notice up to 90 days.

9.5 No-Cost Extensions and Carry Forward are requests to extend the termination date of a project without additional funds.

Some federal sponsors allow the institutions to approve an extension internally with notification of the sponsor; other sponsors require that a formal request for additional time be submitted for their approval. The timing for such requests varies by sponsor, but should generally be processed at least 30–45 days prior to the scheduled termination date of the project.

9.6 Relinquishment of an Award

A PI/PD leaving BU for a position at another institution, with the agreement of the sponsor, is normally able to transfer a grant/contract to another academic or non-profit organization. Because sponsored project awards are made to the University and not to the individual investigator, the University must agree to the relinquishment.

See also [Chapter 11.1](#): Transfer Issues in Grant Administration

9.7 Allowability of Costs (See also Chapter 6.1)

(**See also** [Chapter 6.1](#): Principles of Sponsored Project Support)

9.7.1 Cost Allocations

Goods and services purchased by the University to conduct research may often benefit more than one sponsored award. Such costs must be allocated to the sponsored awards in proportion to the actual benefit received by the awards. If it is impossible or impractical to determine how much of the goods or services are actually used for each award, an allocation methodology must be developed that reasonably estimates the actual benefit to each award. Costs are then distributed to each benefiting sponsored award using the allocation methodology. OMB Circular A-21 allows for two methods for allocating an allowable direct cost to two or more grants:

- **Proportional Benefit:** If a cost benefits two or more projects or activities in proportions that can be readily determined, the cost should be allocated to the projects.
- **Interrelationship:** If a cost benefits two or more projects or activities in proportions that cannot be easily determined due to the interrelationship of the work involved, then the cost may be allocated to the benefiting projects on any reasonable basis.

Examples of acceptable allocation methodologies include: effort of research personnel (headcount or fulltime employees), laboratory space (square footage), number of experiments, actual usage records, or modified total direct cost budget (excluding subawards) of benefiting sponsored projects. Please consult PAFO for assistance in developing appropriate cost allocation methodologies.

9.8 Cost Transfers

A cost transfer is the reassignment of an expense to a sponsored project after the expense was initially charged to another sponsored or non-sponsored project. The University expects that all costs are charged to a sponsored project correctly at the outset. However, the PI/PD and departmental administrator should review sponsored project reports on a monthly basis to identify legitimate errors in a timely manner. When errors are discovered, the University is committed to ensuring that all cost transfers (either in the form of a labor distribution adjustment or non-salary journal entry) are legitimate and are conducted in accordance with sponsor terms and conditions, regulations, and University policy. Frequent, late (greater than 90 days old), or poorly explained transfers raise serious questions about the propriety of the transfers, the accounting system, and internal financial controls. All PI/PDs and their departmental administrators are responsible for ensuring that transfers of costs to sponsored projects represent corrections of errors and are made promptly.

Cost transfers must be supported by documentation that contains a full explanation of how the error occurred and a correlation of the charge to the project to which the transfer is being made. Explanations such as "to correct an error" or "to transfer to correct project" are unacceptable. Transfers of costs to any sponsored project account are allowable only where there is direct benefit to the project account that is being charged. An overdraft or any direct cost item incurred in the conduct of one sponsored project may not be transferred to another sponsored project account merely for the sake of resolving a deficit or an allowability issue. Cost transfers should not be used as a means of managing awards. Cost transfers must be prepared and submitted within 90 days from the date the original charge was posted to the project. Cost transfers made after this period require prior PAFO approval and will only be permitted under extenuating circumstances. Cost transfers to correct an error must be completed regardless of timeframe if the correction benefits the sponsor.

For Additional Information see:

[Cost Transfers](#)

9.9 Effort Commitment and Reporting

As a condition of receiving funding from the federal government, the University maintains a system of reporting effort devoted to sponsored projects, which allows responsible individuals to certify the portion of their effort and salary devoted to each sponsored project activity. Outlined below are some of the significant points of BU's Effort Reporting policy.

9.9.1 Committing Effort

At the time of proposal development, the PI/PD prepares a budget in which he/she determines the percent of effort or person months needed for each of the positions proposed to work on the project. In preparing such a budget and managing effort once an award is received, the following key elements must be taken into consideration:

- Total University Effort is the sum of all professional activity or effort for which an individual is compensated by the University. Total University Effort is not based on a “standard” work week. Total University Effort generally includes externally sponsored research activity, department research, teaching, clinical service, administrative duties, and proposal writing. Activities outside of Total University Effort include personal consulting and other outside compensated professional work as described in the External Compensated Activity Policy, volunteer individual community or public service, and Veterans Administration Hospital compensated activities documented in a Memorandum of Understanding (MOU).
- Maximum Allowed Sponsored Project Effort: Most faculty are unable to devote 100% of their time to sponsored activities due to other responsibilities that include teaching, administrative work, patient care, competitive proposal writing, and service. Accordingly, unless the circumstances of a particular faculty member demonstrably warrant otherwise, the total effort and salary of a faculty member should normally not be 100% supported by sponsored projects in a given effort period. Such circumstances might include being on sabbatical, leave of absence, or having relief from teaching and other responsibilities. Salary support for time spent on non-sponsored activities must not be charged to sponsored funding sources.
- Minimum Proposed Effort: All projects must show some level of activity (1% or more) by the faculty listed as PI/PD or key personnel unless specifically exempted by the sponsor (e.g., equipment grants). Such exemptions may include equipment and instrumentation grants, dissertation and training grants and limited purpose grants such as travel grants and conference support.
- Committed Cost-sharing of Effort: A cost associated with a sponsored project, identified in the proposal, but was not required or funded by the sponsor is considered voluntary committed cost-sharing. As a general practice, Boston University discourages the usage of committed cost sharing in sponsored project proposals. This type of cost sharing must be accounted for through the creation of a cost sharing account once the award is received.
- Summer Effort/Salary for Faculty with nine-month academic appointments: Faculty compensated for 9-month academic appointments are permitted to expend up to an additional three months of summer effort and earn up to three months of additional salary for that effort, subject to sponsor policies and the approval of the Department Chair and School / College Dean. If a faculty member has administrative or other non-research responsibilities (including vacations) during the summer period, they may be precluded from devoting 100% effort to sponsored projects and thus from requesting 3 months of salary from those sponsored projects.

9.9.2 Certifying Effort

Once an award is received and effort is devoted to the sponsored project, the University is responsible for providing a mechanism through which the effort devoted to the project is certified. In certifying effort, the following points must be considered:

- The percentage of an individual's salary charged to a sponsored project cannot exceed the percentage of the individual's effort that is expended on the project during an effort reporting period.
- If the percentage of effort expended in a given effort reporting period is less than the percentage of salary charged to the sponsored project during the period, the salary charges must be reduced to reflect actual effort.
- Certification Eligibility: BU certifies effort through the Personnel Activity Reporting (PAR) system. All faculty and non-faculty PIs must certify their own PARs. Non-faculty personnel, such as professional staff and lab technicians may certify their own PARs or the PI or other responsible official(s) may certify the effort using suitable means of verification that the work was performed. Student effort should be certified by the student's supervisor or the PI. Generally, a department research administrator will not have after-the-fact knowledge of an individual's total work effort and should not certify the effort of research staff unless they have such written after-the-fact confirmation from an individual having direct knowledge and possessing suitable means of verification.
- Certification Timing: Faculty, PIs and other individuals are responsible for completing Personnel Activity Reports within 60 calendar days from the time they are generated from the PAR system.

9.9.3 Activities Associated with Sponsored Project Effort

Identification of activities that can be supported by a sponsored project is critical to accurate effort reporting. Many work-related activities, although expected and paid for by the University, may not be appropriate for a sponsored project and do not further the mission of the project. Listed below are some of the activities that may or may not be appropriate for a sponsor to support.

9.9.3.1 Examples of activities that *are* part of sponsored project effort:

- Effort devoted to conduct the research as identified in the proposal supported by, for example, NIH, NSF, DOD, foundations, or clinical trials.
- Writing a progress report for an **existing** award.
- Holding a research meeting with lab staff.
- Attending a scientific conference related to the research being conducted and held by an outside professional society or agency.
- Reading scientific journals to keep up-to-date with the latest advances in the field of research.

9.9.3.2 Examples of activities that *are not* part of a sponsored project effort:

- Writing a new grant application.
- Mentoring a junior faculty member in the department (unless part of a sponsored project requirement).
- Attending departmental faculty meetings.
- Serving on the IRB/IACUC.
- Serving on an NIH Study Section.

9.9.4 Salary Reallocation & Recertification

Once certification of salary has been completed, only in rare circumstances will subsequent salary adjustments be permitted. If it is necessary to adjust the salary charges for a previously certified effort period, documentation including a detailed explanation of the need for the salary adjustment and subsequent recertification must be provided. This documentation must be approved by the Principal Investigator and be submitted to the Assistant Vice President for Post Award Financial Operations for approval. If approved, a revised and re-certified PAR and Salary Adjustment Request Form are then required. A salary reallocation that benefits the sponsor will always be approved.

9.9.5 Important Considerations

As sponsored projects start, expire, and overlap the line of communication must remain open between the PI/PD and the business office. The business office staff must know which individuals are expected to work on a new project and which awards or University accounts individuals will transfer to when an award expires. In addition, it is important for all parties to address effort commitments that will not be met or the need for a no cost extension to continue a project. Effort requirements could involve multiple parties, including the PI/PD, business office staff, OSP, and the sponsor.

For additional information regarding effort reporting at Boston University, please refer to the [Sponsored Program Effort Certification Policy](#).

9.10 Other Financial Management Issues

Most awards are made on a “cost-reimbursable” basis, where the University is reimbursed for actual expenses incurred—usually on a monthly basis—by billing the sponsor or by drawing against a sponsor’s LOC account. Some awards, usually from private sponsors, are funded by a payment schedule which typically includes some advance payment. Should the PI/PD receive a sponsor check, he/she should take it to his/her business office, which will forward it immediately to PAFO along with identifying information for deposit to the project account.

9.10.1 Strategic Sourcing and Procurement

PI/PDs should first consult with their departmental administrators for assistance with purchasing and ordering procedures. Procedures vary depending upon what is

ordered. BU has contracts with some vendors to ensure the best prices, and most large items require bids or unique source justification. Consulting with the appropriate person in the Sourcing and Procurement Department can greatly simplify and facilitate the process. PI/PDs should note that special procedures apply to the purchase of hazardous and other restricted items.

For Additional Information see:

[Sourcing and Procurement](#)

9.10.2 Equipment

The University must properly classify, safeguard, and depreciate its equipment and abide by federal guidelines as stated in OMB Circular A-110 and the terms of sponsored awards with respect to the purchase, use, and disposition of equipment. PI/PDs planning to purchase equipment using sponsored project funds should refer to the specific terms of the agreement and contact OSP for any necessary advance approvals.

Each department of the University should maintain an accurate inventory of its equipment. In addition, federal regulations require that a complete equipment inventory survey be taken every two years by Property Management.

For Additional Information see:

[Property Management](#)

9.10.3 Animal Charges

Boston University investigators conducting protocols involving animals will incur animal-related charges, including purchases and husbandry costs. As stated in the Animal Care and Use section in Chapter 3, PI/PDs are responsible for assuring that there is an approved protocol on file with the IACUC Office for any work involving the use of animals, and in the case of externally funded research, that the approved protocol is linked with a specific proposal or sponsored project. Charges for the purchase or caring for animals should not be charged to a sponsored award prior to receiving such approval.

9.10.4 Travel

In addition to meeting all other policy requirements, travel costs charged to grants and contracts are subject to specific limitations and restrictions, in accordance with the terms set by the sponsor. Travelers on University business trips that are funded by a federal grant or contract must abide by the OMB Circular A-21 rules on air travel.

- Domestic Travel: Domestic Travel is defined as travel within and between any of the 50 United States, Puerto Rico, U.S. Virgin Islands; travel between the United States and Canada and within Canada. When traveling domestically, one should use the lowest available economy class airfare.
- Foreign Travel: International travel on projects funded directly or indirectly by federal funds requires travelers to comply with the Fly America Act. For

international air travel, Federal requirements state that American carriers must be used when a traveler is flying between the United States and another country or between other countries. Not using American flag carriers when only cost and convenience are factors is not permitted. Exceptions to use of American carriers can be found on page 20 of: [Travel and Business Expense Guidelines](#). Questions should be addressed to PAFO.

- **Prior Approvals:** Grants from some federal agencies and most federal contracts require that all international travel—even if included in the award—be approved in advance (normally 45–90 days) by the sponsor's grants or contracts officer.

For Additional Information see:

[Travel](#)

9.10.5 Program Income

Program Income is gross income directly generated by a supported activity or earned by the institution as a result of an award during the period of the award. The treatment of program income on federal grants is stipulated by the administrative requirements of the awarding agency and depends, in part, on whether the funded project is for research or another approved activity. Similarly, non-federal sponsors may have terms and conditions that govern the treatment of program income. There are three methods for treating Program Income:

1. *Additive:* Program income funds are added to the project's committed funds by the awarding agency and recipient, thus increasing the amount available to accomplish program objectives (increase in available budget).
2. *Matching:* Program income is used to finance the non-federal share of the project (offset to cost-sharing or matching). Program income is used for costs during the project period unless the sponsor authorizes deferral to a later period.
3. *Deductive:* Total funds available to the project remain the same and the funds generated through program income are deducted from the financial commitment of the sponsor (offset to sponsor's funding).

In most cases, a separate account should be established to house program income. This allows accountants to submit reports on program income easily, auditors to review program income for compliance with regulations, and allows PI/PDs to utilize their program income funds (where allowable) to maximum advantage. Whether a separate account is created or not, the following are minimal expectation of PI/PDs and departmental administrators with respect to program income:

PI/PDs are responsible for the following:

- Identifying sources of actual and potential program income at the proposal stage.
- Completing required program income sections in the grant proposal as necessary.

- Developing a plan for using program income.
- Discussing anticipated program income with the departmental administrator.
- Verifying program income on reports.
- Addressing account balance issues at final project termination.

Departmental administrators are responsible for the following:

- Assisting PI/PD in calculating prices.
- Billing for products or services which produce program income.
- Reconciling revenue invoiced or submitted against financial reports.
- Monitoring levels of program income in the account and any limits that are set by the sponsor.
- Properly depositing income received in accordance with the University's revenue policy.
- Monitoring expenditure levels.

PAFO is responsible for tracking and reporting program income to sponsors

9.10.6 Interest-Bearing Accounts

BU will accept grants which contain a provision requiring the accrual of interest on advance payments. Depending on the terms and conditions of the award, interest earned may need to be returned to the sponsor or used to further support the purposes of the sponsored project. For federal awards, interest on "excess cash" (cash in excess of current expenses) in excess of \$250 annually must be returned to the federal government. If payments are made in advance and there is no formal requirement to make the interest available to the project, such interest is deposited in the institution's general fund.

9.10.7 Service Centers

A Service Center is an organizational unit which provides specific types of goods and/or services to Boston University departments and is supported by interdepartmental charges to the user department's operating accounts. The users typically determine the amount of goods or services they obtain. Such goods or services might be available from commercial sources, but for reasons of convenience, cost, or control are often provided more effectively and conveniently through a BU service center. Service center rates are calculated based on costs that will result in a "break-even" situation. Service centers must follow these standards:

- Provide goods and services primarily to other BU departments, sponsored programs, or activities.
- Operate as a discrete unit having control of revenues and expenses with ongoing activities.
- Charge all internal users equally for services at a rate calculated to recover their costs over a fixed period of time.
- Sales to external entities, if any, usually are incidental.

For additional information about service centers at Boston University, including programmatic and financial management policies, rate calculation templates, and a

listing of BU service centers, please visit the [Service Center Administration](#) homepage.

9.10.8 Financial Monitoring

Overspending or under-spending projects can reflect poorly on the PI/PD, PAFO, and the University, indicating inadequate planning or poor internal financial management and controls. A major responsibility shared by the PI/PD, the departmental business office, and PAFO is to monitor the budget and ongoing charges. If a project ends with a deficit, the PI/PD's department or administrative area is responsible for covering the remaining expenditures. Under-spent projects, though of less concern than overspent ones, can still be serious. Particularly severe under-spending (20% or more of a project's total direct costs) can suggest that the goals of a project have not been met or that the Cost Accounting requirements related to budgeting were not utilized. In most cases funds not spent by the end of the project period must be returned to the sponsor.

To avoid either of these issues, careful planning, monitoring, ongoing communication with the sponsor, and revising the work plan as needed should be exercised throughout the life of the project. Reports are available from the University's financial system to reflect sponsored project activity. This information should be used by the PI/PD and departmental administrator to monitor the financial health of a sponsored research project and reviewed to determine whether:

- Charges are within agreement, budget, and agency guidelines.
- Charges are reflected in the correct budget categories.
- Funds are being expended in a timely manner.
- Cost overruns or severe under-spending are developing in specific budget categories.

Additional information on financial management, including BU's Overdraft Policy, can be found on the [PAFO Resources](#) page.

9.10.9 Sub-Recipient Monitoring

As a condition of its acceptance of funding from sponsors, the University is obligated in its role as primary recipient to undertake certain stewardship activities as well as to ensure that performance goals are achieved.

9.10.9.1 Pre-Award Administration

Prior to award, OSP assesses a subrecipient organization's financial status and internal controls. In rare instances, BU may determine that the risk of entering into a subaward with the proposed entity is excessive and not move forward with executing the agreement. In addition to those required by the sponsor, OSP will establish terms and conditions in the subrecipient agreement consistent with the level of perceived risk.

9.10.9.2 Post-Award Monitoring

The subrecipient agreement indicates the address to which monthly invoices are sent. These invoices are reviewed by the PI to ensure that adequate technical progress has been made to support the charges and by PAFO for compliance with the terms and conditions of the subrecipient agreement. The signature of the PI on the invoice or evidence of PI authorization through other means (such as email) is required. Alternate signatures (e.g. department administrator, graduate research assistant, postdoctoral fellow, etc.) are generally not considered adequate because these individuals generally do not possess full knowledge of the costs incurred in relation to the work performed on the subaward. Cases of inadequate performance must be brought to the attention of the OSP administrator as soon as they are discovered since BU has the responsibility to notify the sponsor if any lack of performance on behalf of the subrecipient will have a significant (unanticipated) impact on the scope of the award.

9.10.9.3 Subaward Closeout

Before a final invoice can be paid, the BU PI must certify that all technical reports and /or deliverables have been received and that the subrecipient has fulfilled its obligations. Final verification of technical completion by the subrecipient is indicated by the PI's signature and date on the final invoice. In addition, final close out documents [residual property; inventions and discoveries (including a negative report); subrecipient's release forms (where applicable), final risk assessment review; final audits (desk, assist when necessary)] are required.

9.10.9.4 Other Monitoring Activities

Boston University employs a "risk-based" approach to subrecipient monitoring. Factors that may affect the timing, nature, and extent of during-the-award monitoring include program complexity, percentage passed-through, amount of award, organization type and overall subrecipient risk. BU uses several tools in its monitoring activities, including annual questionnaires, audit review and resolution, and desk reviews.

For additional information on Subrecipient Administration and Monitoring, please visit the "Subrecipient Agreements" section on the [PAFO Post Award Policies](#) page.

9.10.10 Project Reporting and Financial Closeout

Sponsors typically require periodic financial and technical reports. The schedule and format for completing reports is outlined in the sponsor's notice of award or in the agency's general terms and conditions. The PI/PD is responsible for submitting both the periodic and the final technical report to the sponsor within the timeframe specified. Failure to submit these reports in a timely manner could jeopardize future funding by the sponsor, not only for the PI/PD, but also for other BU investigators funded by the same sponsor.

A copy of a project's final report or a copy of the transmittal letter must be submitted to OSP. PAFO submits financial reports to the sponsors for research and other scholarly activity that reflect the use of sponsored funds as recorded in the financial records of the University and are in compliance with the sponsor's terms

and conditions. Compliance with policies surrounding the use of a sponsor's funds is a responsibility shared by PI/PDs and the departmental business office.

Interim Reports: The PI/PD's business office must sign off on interim financial reports and return them to PAFO within the time period specified. Draft interim reports not returned within the specified period will be submitted to the sponsor based on the University's financial records without departmental approval in order to ensure compliance with the sponsor's reporting deadlines.

Final Reports: The department that is considered to be responsible for an award will review and verify draft final financial reports, communicate changes and additional information to PAFO, and return the draft report—signed by the department business office and/or the PI/PD—to PAFO no less than 30 days prior to sponsor's reporting deadline. Draft final reports not returned within the specified period will be submitted to the sponsor based on the University's financial records without departmental approval in order to ensure compliance with sponsor reporting deadlines. At the time of closeout, PAFO is responsible for changing the award status in the University financial system to "AR [Accounts Receivable] Status" to prevent further charging to the account.

Sponsored Projects Financial Reporting and Financial Closeout

For Additional Information see:

Provost and VP Over-expenditure Memo, August 2008: [Provost Overdraft Memo](#) & [Overdraft Policy](#)

9.10.11 Fixed Price Awards

Boston University, as a not-for-profit educational institution, conducts sponsored programs on a cost reimbursement basis. However, BU's OSP will consider a fixed-price relationship only in exceptional cases when there is no alternative. In such cases, deliverables on fixed price awards should be limited to status and/or final technical reports.

All cost proposals for fixed price relationships should be estimated on a cost basis consistent with standard cost accounting policies. A detailed budget should be prepared for BU/OSP review, even if not required by or submitted to the sponsor. Fixed price relationships should never be utilized where there is any uncertainty related to anticipated costs. Expenses should be budgeted and justified based on anticipated reasonable cost. Budgets should not anticipate revenue in excess of expense or funding to recover expenses incurred prior to the beginning of the project.

All proposals, including the statement of work, description of deliverables, delivery due dates, and budget should be routed in accordance with BU standard procedures. The PI/PD, the unit head, and the dean of the school must review and sign the BU Proposal Summary Form, accepting the risks inherent in a fixed price agreement.

9.11 Audits

9.11.1. Overview

Sponsors presume that the University will expend funds for the purposes for which they were given and in accordance with any terms and conditions set forth in the award document. Sponsors generally reserve the right to audit the University's financial records for sponsor awards and, in some cases, may audit the project's scientific records and data. If a PI/PD or department is contacted directly regarding any type of audit, OSP and the Internal Audit office should be informed immediately.

9.11.2 Pre-Award Audits

Occasionally a sponsor may require an audit before the issuance of an award. Such pre-award audits generally involve responses to federal requests for proposals that will result in the issuance of a contract that is more than \$500,000 per year. Faculty should contact OSP if they receive a request for a pre-award audit.

9.11.3 Post-Award and System Audits

The "Single Audit Act of 1984" and the OMB Circular A -133 require an annual audit by the University's certified public accountants, as required. Any federal agency, however, can also audit its specific awards. These audits tend to be efforts to determine whether the University is managing grants and contracts in accordance with federal laws and regulations. PAFO is responsible for managing post-award and system audits, with the support of the Internal Audit office and OSP.

9.11.4 Audit Request

PAFO is the focal point for the coordination and conduct of financial audits of sponsored programs. Upon notification of an audit, PAFO will inform the Comptroller, Internal Audit, the Office of General Counsel (if appropriate), OSP, the department business office, and the PI/PD of the anticipated audit. Upon being contacted by PAFO, the Business Office will designate an individual with knowledge of program expenditures for the purpose of answering questions that may arise during the audit. The Business Office must also notify and/or arrange for the PI/PD or other individuals at the department or school-level to be available for an interview, if requested by the auditors.

9.11.5 Entrance Conference

Auditors will often request an entrance conference. If the PI/PD and Business Office representative need to be present, they will be notified by PAFO, and representative from the PAFO will act as the liaison between the auditors and all other University areas for the purpose of retrieving documentation and/or contact with department personnel.

9.11.6 Documentation Requests

Auditors must provide a list of required documentation identifying each transaction to be reviewed.

9.11.7 Exit Conference and Audit Reports

An exit conference is normally conducted at the close of any audit.

Chapter 10

Other Awards and Agreements

There are non-federal awards and agreements in support of research that also require special consideration. As with grants and contracts, all agreements discussed below—with the exception of consulting agreements for services to the institution—require an authorized institutional signature and must be reviewed by OSP.

10.1 Collaborative Agreements

Collaborative agreements are those under which Boston University investigators work with researchers from other entities on defined research projects. These arrangements thrive on intellectual input from both parties and may involve the sharing or exchange of research materials and other resources. These arrangements, which are sometimes called Cooperative R&D Agreements (CRADAs), may require that each institution fund its own activities, or that one party may provide financial resources to the other collaborator. Important considerations include whether any confidentiality provisions are in the agreement and if so, whether the terms have been communicated to all key personnel. Difficult issues sometimes include the Intellectual Property (IP) terms governing ownership of any research results and access by both parties to any resulting inventions.

10.2 Service Agreements

In general, service agreements are handled through OGC and PAFO. They typically indicate that BU will provide services to another entity, or that another entity will provide services to BU. Projects must be in accord with the mission of the University and must contribute to the objectives of the department and school. Service agreements may address a variety of areas:

- Service agreement for analysis or assay.
- Use agreements (may include equipment, facilities, computer programs).
- Physician specialties (excluding VA Administration).

Service Agreements that include the loan of equipment should involve both OSP and the Sourcing and Procurement Department to ensure that the terms are consistent with those typically negotiated with an equipment vendor and place the University in a position of minimal risk and liability. Other considerations include the eventual disposition of the loaned equipment, cost of equipment maintenance, and possible confidentiality of equipment specifications or performance. While the data resulting from a testing agreement may be linked with a sponsor's material (which may or may not be proprietary), the agreement should not prohibit publication by the University of the PI/PD's methods

Budgeting for service agreements assumes recovery of full cost including F&A. Payment of testing or analysis performed on a piece of equipment purchased with federal funding may be accountable as program income to the federal award or may be prohibited for use outside the University. Consideration should be given to the need for insurance. Testing arrangements must be competitive with the costs assessed by commercial organizations, and there must be some academic benefit to the activity. In some circumstances, BU may choose to subsidize some external users when there is significant benefit to the institution to do so. Any inappropriate use of testing agreements may be subject to unrelated business income tax. Finally, indemnification of BU should be part of every Service Agreement.

10.3 Material Transfer Agreements

Material transfer agreements (MTAs) are agreements that set the terms on which proprietary materials are transferred by BU to, or received by BU from, another institution for use by designated persons in specified research protocols. Proprietary materials that are often transferred under an MTA include, for example, certain chemical compounds and genetically altered mice. MTAs address the scope of permitted use, publication, and the respective intellectual property rights of the transferor and the recipient. The terms of these agreements vary depending upon whether the materials are “incoming” or “outgoing,” and whether the other party is an academic institution or a for-profit company. Hazardous materials and materials to be used in humans may be transferred under an MTA, but special conditions will apply.

Researchers generally initiate an incoming transfer by obtaining a standard form from the transferring institution. Faculty members typically deal directly with OSP on incoming MTAs and with the Office of Technology Development on outgoing MTAs, and if receiving materials are often required to sign the MTA. As with other agreements, an authorized institutional signature is required in addition to the signature of the PI/PD. Where possible, the federally developed MTAs are used. Currently, work is underway to standardize MTA agreements and the processes relating to them.

For Additional Information see:

Material Transfer Agreement Guidance on the [OSP Policy](#) page

10.4 Intergovernmental Personnel Act Agreements (IPAs)

Intergovernmental Personnel Act (IPA) Agreements are contracts whereby a BU employee may provide research, administrative, or other services to a federal agency for a limited period of time. Some or all of the salary and staff benefits are paid by the federal agency while the individuals are still considered to be University employees. The University must agree to employ an individual in the same capacity after his or her assignment. OSP can provide further information.

10.5 Confidential Disclosure Agreements (CDAs)

CDAs (also called Non-Disclosure Agreements [NDAs]), are agreements under which one or both parties commit to keeping information that has been disclosed to them confidential for a certain time and using it only for an agreed purpose. These

agreements may be required in connection with negotiating an intellectual property agreement or a proposed research collaboration. They are typically required before BU investigators and colleagues enter into a research collaboration agreement in order to permit the parties to share proprietary research ideas on a preliminary basis. Additional information or review of CDAs is available from the appropriate OSP or intellectual property office, depending upon the subject of the CDA.

10.6 Faculty External Consulting Agreements

Outside professional activities can be beneficial to the faculty member and to the broader community. Limited engagement in professional activities carried on outside the University and for which compensation is not received through the University is encouraged if it contributes to the professional experience and public service of the faculty member. Consulting at the appropriate professional level exposes faculty to current problems and concerns in the discipline, and external contracts often lead to the development of industry-supported grants and contracts. In addition, outside activity can and should be of a nature to advance the reputation of the University.

Consulting agreements are private agreements entered into by the sponsor and the PI/PD and are not affiliated with BU. The agreements typically refer to external consulting work to be performed by the PI/PD for a company or organization. The following should be considered when evaluating a consulting agreement:

- PI/PDs are limited to one day per week for external activities (although some averaging over a semester is possible with advance approval).
- Consulting agreements should not conflict with University patent policies.
- Consulting agreements may create significant financial interests for purposes of the University's Policy on Investigators' Conflicts of Interest.
- The terms of the consulting agreement are strictly between the PI/PD and the sponsor.

For Additional Information see:

[Compensated Activity](#)

Chapter 11

Transfer Issues in Grant Administration

11.1 Policies and Procedures for when a PI/PD Leaves Boston University

The ability to transfer a sponsored project from Boston University to another institution is dependent upon the regulations and policies of the sponsoring agency and those of BU. Policies vary widely between sponsors, and the PI/PD is strongly encouraged to contact the appropriate OSP office for specific information as soon as possible after deciding to move to another institution. There are four parties involved in any transfer request: the PI/PD, the original institution, the new institution, and the sponsor. Should the original institution decide not to nominate another PI/PD or to continue the project at the institution, and if the new institution is willing to undertake the administration of the project, the sponsor will usually agree to the transfer. Criteria for this decision include the following:

- Consideration of the time left on the project.
- The amount of remaining funds.
- What, if any, work will remain at BU.
- Whether the new institution has adequate facilities, equipment, and staff.

The PI/PD should remember that equipment purchased on prior awards or earlier competing segments of the award that is being transferred are the property of the University and may not be transferred to the new institution without specific permission and, occasionally, appropriate compensation for any cost-sharing or alterations/renovations originally required to put the equipment in service. This also applies to equipment included as part of a faculty start-up package.

11.1.1 National Institutes of Health (NIH) Awards

To transfer an NIH award from BU, NIH requires the submission of an "Official Statement Relinquishing Interests and Rights in a Public Health Service Research Grant," which signifies the original institution's willingness to terminate the grant and relinquish all claims to any unexpended funds. The form indicates the proposed date of transfer and estimates the amount of funds that remain in the account.

[Transfer of NIH Award from BU:](#)

In making this transfer of an NIH award from BU to another institution, the following forms are required:

- Relinquishing Statement
- [Final Invention Statement Forms](#)
- Final Technical Report

All requests must be routed through the departmental business office to OSP for review and processing. A proposal (SF 424) must be prepared by the new institution and submitted to NIH.

To transfer an NIH award to BU, the Relinquishing Statement is completed by the original institution and sent to NIH. The PI/PD must prepare a new proposal (PHS 398) at BU for submission to NIH. The proposal must be routed through OSP, as with all other proposals. This is normally accomplished as close to the start date at BU as possible to minimize the break in the research.
[Transfer of NIH Award to BU](#)

11.1.2 National Science Foundation (NSF) Awards

To transfer an NSF award from BU, the NSF Grant Transfer Request must be completed in FastLane by the PI/PD. OSP must be given access to review the request and submit it to NSF. The Transfer Request will be sent to the new institution, which will prepare a budget for the unobligated balance in the current year and any future committed years of the grant. The budget, a progress report and statement of work to be accomplished, plus appropriate certifications will be sent to NSF by the new institution.

To transfer an NSF award to BU, the NSF Grant Transfer Request must be completed by the original institution and sent to NSF via FastLane. NSF will then send the Grant Transfer Request to the new institution. The departmental business office will prepare a budget for the unobligated balance in the current year and any future committed years of the grant. The budget, institutional information, and statement of work to be accomplished must be sent to OSP for review and submission to NSF, along with appropriate certifications. The proposal must be routed through OSP, as with all other proposals.

[Transfer of NSF Award to BU](#)

11.1.3 Other Sponsors and Non-Transferable Awards

Information specific to other sponsors can be obtained from OSP. Some sponsors have their own forms while others may require letters seeking approval for transfers. Timelines vary among organizations. Some awards are not eligible for transfer because they are dependent upon institutional resources (for example, training grants and awards for undergraduate laboratory equipment). Clinical trial agreements are also not transferable and must be closed out prior to the PI/PD leaving BU.

11.1.4 Transfer and Disposition of Equipment

Equipment purchased with University funds in whole or in part is the property of Boston University. Equipment purchased using funds from an external sponsor may belong to the University or to the sponsor depending upon the sponsor's regulations. When a faculty member wishes to transfer equipment purchased either under grants or by the institution, Property Management should be contacted to provide

information about ownership and undepreciated value to the department chair. In most cases, equipment purchased on currently active awards normally transfer to the new institution, but permission must be granted by the department chair for the transfer of equipment acquired from grants, but now owned by BU. When funds from BU were used to buy equipment, permission is also required from the dean and provost to move it.

11.1.5 Safety, Research, and Administrative Considerations Upon Leaving Boston University

Boston University is in the process of developing an Exit Checkout Procedure for all Administrative/Professional and Teaching/Research faculty and professional research staff to be executed prior to employee termination. Termination is any voluntary or non-voluntary resignation or retirement. This formal process is being created in order to mitigate financial risk and other liabilities associated with improper handling and management of materials, equipment, and information when an employee leaves the University. It also provides a uniform approach to the management of grants and contracts in which researchers or faculty are involved, formalizes data retention and transfer procedures, provides information about committee activities and assignments, as well as completing all necessary human resources, library, and departmental documents needed upon departure.

Please see "Faculty Departure Procedures" on the [BU Faculty Central website](#), under the Faculty Handbook and School Bylaws section.

Chapter 12

Other Concerns

12.1 Acknowledgement of Support

Appropriate acknowledgment of a sponsor's financial support for research projects is critical. Care should be taken to acknowledge properly all sponsors who contributed to research publications. In general, acknowledgment includes the award number and name of the sponsor(s). Sponsors will typically indicate the format of such acknowledgment.

12.2 NIH Public Access Policy

The [NIH Public Access Policy](#) implements Division G, Title II, Section 218 of PL 110-161 (Consolidated Appropriations Act, 2008). The law states:

The Director of the National Institutes of Health shall require that all investigators funded by the NIH submit or have submitted for them to the National Library of Medicine's PubMed Central an electronic version of their final, peer-reviewed manuscripts upon acceptance for publication, to be made publicly available no later than 12 months after the official date of publication: Provided, That the NIH shall implement the public access policy in a manner consistent with copyright law.

The NIH Public Access Policy ensures that the public has access to published results of NIH funded research on PubMed Central (PMC). There are several ways in which authors may submit papers to PMC, including [submitting papers](#) via the NIH Manuscript Submission System (NIHMS).

How to Comply

All of All of your papers that fall under the NIH Public Access Policy, whether in press or in print, must include evidence of compliance in all of your NIH applications and reports.

1. Determine Applicability
 1. Does the NIH Public Access Policy apply to your paper?
2. Address Copyright
 1. Ensure your publishing agreement allows the paper to be posted to PubMed Central in accordance with the NIH Public Access Policy.
3. Submit Paper
 1. Submit papers to PubMed Central and approve public release.
 2. Include PMCID in Citations

3. Include the PMID at the end of the full citation in your application or report

[NIH Public Access Policy](#)