The Grant Process at Sargent

4 Step Process

- 1) Application 2) Office of Sponsored Programs 3) Granting Agency Deadline 4) Award Given

Step 1: Application

- Have a meeting with the Research Administrator
  - Please contact the Research Administrator at least three weeks before a submission deadline in order to ensure your proposal is submitted on time. If you are planning on having a subcontract on the grant, please have the Research Administrator at the sub's institution contact Sargent's Research Administrator at least three weeks before the submission deadline as well. These deadlines should be adhered to for both new proposals and competing renewals.

  - Before this meeting, the PI should provide relevant documentation (program announcement, etc.) and pertinent "inside" or background information to the Research Administrator.

  - The faculty member (PI) should bring a skeleton budget to the meeting. The budget should include rough ideas about personnel needs (faculty and staff % time or hours), supplies, travel, etc. This is important because certain granting agencies have very specific staffing, scope/mission, and budgetary requirements (e.g. ceilings on personnel; does this agency fund things of this scope? subcontracts?) and the application must "match" the granting agency selected. It is not necessary to have every detail nailed down; but the basic configuration should be in place. The Research Administrator will calculate all directs and indirects. ***Please keep in mind that the PI's percent effort should be discussed and approved by his or her respective department chair before meeting with the Research Administrator. The percent effort on the proposal will be the percent the Research Administrator uses to calculate the salary.***

- Putting your proposal together
  - Completed versions of the internal documents must be submitted to the Research Administrator at least 5 business days prior to the agency's deadline for submission to OSP. Completed versions of the internal documents consist of a project summary, the final budget, final budget justification, as well as BU's Proposal Summary Form, Conflict of Interest form (electronic), and Export Control checklist. If a proposal includes a subcontract, this would also include the documents from the subcontractor.

  - The conflict of interest form should be completed online and can be found here: http://www.bu.edu/orc/coi-online-module/. Once initiated by the PI, the COI will be routed to any other co-investigators and/or Senior/Key personnel.

- The Research Administrator will set up a folder for each new application on SARNET in the Proposal Development folder. Place final versions of all pieces of the grant application in this folder (forms—usually in pdf format -- biosketches, narratives, tables, etc.).

- Subcontracts:
  - If BU is the Prime Institution on a proposal, the subcontractor must provide the Research Administrator with a detailed budget and budget justification for each year of the project, a letter of intent, signed by an authorized official at that institution, a scope of work detailing what work the subcontractor will be performing, copies of the institution's most recent rate agreement, and biosketches for all Senior/Key Personnel involved in the project. If BU is

the subcontractor, we must provide the Prime Institution with all of the documents mentioned above. Provide your Research Administrator with all the necessary contact information for those involved with the proposal.

  - If you are asked to be on a subcontract on someone else's grant: Before agreeing to do this work, you must meet with your department chair. Then meet with the Research Administrator to prepare the proposal.

- Points to consider/remember:
  - Human Subjects Certification is required for all PI's and "key personnel" if the project involves human subjects. Certification training is available through the Collaborative Institutional Training Initiative (CITI) Program, an online training module. Proof of completion for all key personnel will be required before research funds can be released or when asked for Just in Time information from NIH. BUMC requires recertification every 2 years. The Charles River Campus requires certification every 3 years.

  - Fellowships: Although there are many Fellowships which are directly funded to an applicant and bypass the University system (e.g. NIDRR Switzer), there are others which need institutional approval. Contact the Research Administrator to clarify the type of Fellowship you are applying for.

  - In developing job descriptions and personnel needs for a grant, be aware that they **must** fit into BU titles, grades, salary ranges, qualifications, job descriptions, etc. Please contact Sargent's Personnel Administrator, Molly McCarthy, for help with determining appropriate titles, salary ranges, job descriptions, etc.

- Consultants:
  - BU faculty cannot be paid or unpaid consultants on a project whether in the academic year or for the summer. They must be listed as BU personnel on the grant, even if it is being processed in a different BU department or school. The other department will need to calculate your % effort and allow for the full fringe rate as they would with their own effort.

  - Student grants: Every student grant must have a faculty PI. The same process is followed for a student initiated application as for a faculty-initiated application (some exceptions are Dudley Allen Sargent or AOTF). **The faculty PI must assume this role as if it were their own grant.**

<u>Step 2: Office of Sponsored Programs (OSP)</u>

- All grant applications must be approved (by the Office of Sponsored Programs before sending them to the granting agency.
- The Research Administrator is the direct interface with OSP—not individual PI's, departmental staff, or students.
- OSP needs at least 5 business days before the 'official' deadline of the granting agency to review the application. This allows ample time for the several levels of reviews and sign-offs that need to take place before the University can approve an application.
- When "sent up the street" to OSP, the application can either be 'completed' (the final form is preferable), or have the minimum requirements needed by OSP to review (e.g. budget, budget justification and abstract/description of the project).**It is very important that the PI be available during this period for any "last minute" changes or questions that the Research Administrator or OSP may have. If not on campus, PI must be reachable by telephone and email.**

Step 3: Meeting the Granting Agency Deadline

- The PI must ensure that the application meets proper format (page numbers, type font, table of contents, etc.).
  - The PI is responsible for sending the application to the granting agency by the correct deadline if it is a paper submission
  - For NIH submissions through grants.gov, PI's have a 2-day application viewing window (2 days prior to the deadline – not an additional 2 days)to fix any errors that were found in the initial submission. It is to the PI's benefit to submit before the deadline date as it may take a few days for NIH to find any errors.

Step 4: Award Given

- Please contact Sargent's Personnel Administrator, Molly McCarthy, with any hiring issues such as job postings, writing job descriptions that meets BU guidelines, etc. A month lead-time is needed for this process, more in the summer. It is best to start this process as soon as official notification of funding is received, even if the "start date" is several months away.
  - A worker classification questionnaire must be completed to determine whether individuals should be considered employees or independent contractors. Accounts Payable review the questionnaire and decide which designation is the most appropriate. If classified as an independent contractor, the PI and the Research Administrator will complete a Research-Related Consulting Agreement to be submitted to the Sourcing & Procurement office.

- Post award monitoring is the responsibility of the PI. The Research Administrator can assist in making a spending plan. A spreadsheet with GL codes and descriptions can be found here: http://www.bu.edu/cfo/files/2011/10/GL-Descriptions.xls. Please use this as a reference when monitoring your budgets. Note the 510010 and 510030 GL codes of supplies should not be used for grants.

- If you find an erroneous charge please contact the Research Administrator as soon as possible and he/she will take the proper action required.

- Once a grant is awarded, some funds may be shifted around - especially between BU GL codes that all come under larger grant categories. Please contact the Research Administrator before doing any rebudgeting.

- Progress Reports: The PI is responsible for knowing and following departmental guidelines regarding roles and responsibilities of PI versus staff for monitoring expenditure, preparing continuation applications, etc.

- Final Report: The PI is responsible for timely submission of required report(s).

- On multi-year grants, Research Administrators will assist with the financial and technical aspects of the annual continuation process.

- Carryovers of unexpended funds are usually allowed without sponsor approval under the Expanded Authority Guidelines for federal grants. These guidelines may not apply to non-federal agencies. ***Always*** contact the Research Administrator at least 2 months in advance if you plan to carryover funds from a previous grant year and he/she will advise you on the proper procedure.

- An IPAS form is an internal form used in both pre and post award.
  - In the pre-award stage it is used to request set-up of a pre-award account 90 days prior to the start date specified in the Notice of Grant Award to cover costs that are necessary to conduct the project. The costs must be allowable under the grant.

  - In the post-award stage the IPAS form is used to request a no-cost extension on an award, and/or to request a subcontractor after an award has been made.

  - Please contact the Research Administrator if you need to submit an IPAS form to OSP for any of the reasons stated above.

- Please contact Hillary White, Sargent's Senior Staff Coordinator, with any purchasing needs.

<u>Points of Interest</u>

- Cost-Sharing: The University provides cost-sharing only when necessary. If cost-sharing is not a requirement, do not volunteer it. Prior approval by Chair, Dean, and Vice President and Associate Provost for Research is required for ALL cost-share expenses.

- Purchases on grants: Please check Sourcing & Procurement's guidelines. Be aware that any purchase of *more than $1,000* must go out for bid through BU's purchasing department if you do not use one of BU's preferred vendors. You should always use BU's preferred vendors first, and if they do not have the items that you need, you can then go out for a competitive bid. A list of the preferred vendors can be found on Sourcing & Procurement's website.

- Personal Activity Report (PAR) forms: As a recipient of federal funds, under OMB Circular A-21, Boston University is required periodically throughout the year to certify the effort expended by faculty, staff and students on sponsored projects. At BU, effort reporting is handled via Personnel Activities Reports (PAR). They are received based on the following schedule:
  a) Quarterly for non-exempt staff
  b) Semi-annually for faculty and exempt staff
  c) Annually for students
  These should reflect actual effort. The Research Administrator should be consulted about any changes in the % time allocation. 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. If mistakes or questions require follow-up, see the Research Administrator. **Do not overlook these because they MUST be completed.**

- <u>High Risk Audit Areas</u> :

  Inaccurate effort reporting
  Misallocation of costs
  Excessive cost transfers
  Unallowable costs
  Inadequate subrecipient monitoring
  Incomplete forms describing existing support on applications
  Delinquent reporting to sponsor
  Adherence to special award requirements
  Inadequate institutional oversight

- <u>Unallowable Expenses</u>:

  The government states that certain expenses should be charged as indirect costs, not direct costs, on sponsored programs. Some examples of these expenses are Administrative and clerical staff, office supplies, postage, local telephone, memberships, etc. However, these types of charges may be considered allowable as a direct charge if the expenses are specifically spelled out in the approved budget, the award has major project designation, or if the expense can be identified with the specific sponsored project relatively easily and with a high degree of accuracy. For example, mailing is generally unallowable as a direct charge on a grant. However, if you must mail a substantial amount of surveys, those costs may be allowable as a direct charge and can be paid for from the grant. That is because the volume of the mailing is so great and the mailings are necessary for the project. Another example is a brochure rack. A brochure rack can not be identified with the specific sponsored project relatively easily and with a high degree of accuracy in most circumstances. However, if the brochure rack is only being used for recruitment brochures in clinics who have agreed to let the PI display the brochures, it may be allowable. A justification should be included on the order form that you submit to Hillary White at the time of the purchase because Research Accounting reviews purchases made on grants. If a justification is not included, they will eventually ask for one and it will hold up the purchasing process. Any questions relating to allowable versus unallowable expenses should be directed to the Research Administrator.