

Office of Sponsored Programs

Standard Operating Procedure Manual for Research and Sponsored Programs



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I. OFFICE OF SPONSORED PROGRAMS OVERVIEW

General

This manual provides basic information on University guidelines, and policies and procedures if applicable, related to the administration and utilization of extramural funds for sponsored programs, including research, instruction, training, and public service projects. All principal investigators (PIs), project directors, and other administrative personnel associated with such projects should be knowledgeable about these policies and procedural requirements.

Mission Statement and Services

The mission of the Office of Sponsored Programs (OSP) is to provide leadership, information, direction and technical assistance services to faculty and staff in obtaining external funds to engage in research, instruction, and other scholarly activities. As a result, OSP is charged with providing the following services in support of the research enterprise at WSSU:

- Institutional oversight and administration of sponsored programs
- Training and development
- Management of regulatory compliance
- Research administration reporting and information systems

OSP provides technical guidance during proposal development, reviews proposals prior to submission, negotiates award terms and conditions, and coordinates the administration and financial management of all contracts and grants in collaboration with the Office of Contracts and Grants Accounting.

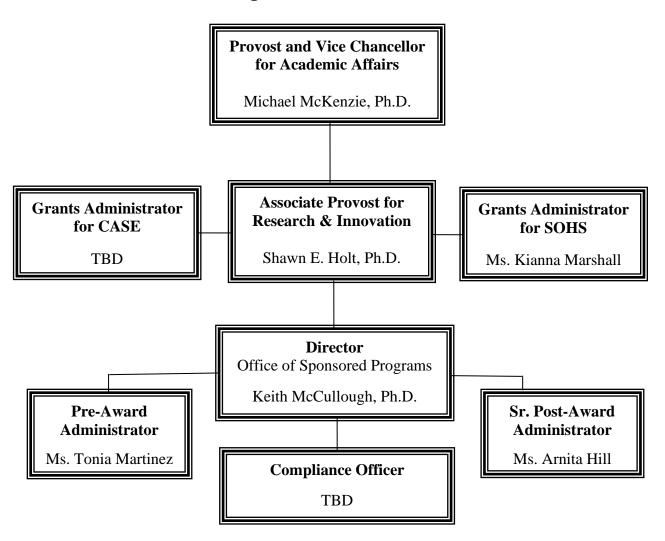
Policy Priority

Where there is a university or state policy in an area not addressed by the sponsoring agency or where the university or state policy is more restrictive than the agency policy, the university and/or policy governs.

Organizational Structure and Location

Oversight for the OSP falls to the Associate Provost for Research & Innovation, who reports directly to the Provost and Vice Chancellor for Academic Affairs. Oversight of research and innovation activities, including OSP administration, for the campus has been delegated to the Associate Provost for Research & Innovation. The campus address is Suite C117 Anderson Conference Center. OSP's organizational chart is displayed below.

Office of the Provost and Vice Chancellor for Academic Affairs Office of Sponsored Programs Organizational Chart



Revised April 4, 2024

II. PRE-AWARD

OSP's Pre-Award services are offered to WSSU faculty and staff interested in pursuing extramural funding from external agencies. Pre-award staff assist University faculty and staff with all phases of proposal preparation and submission. Pre-award staff help identify grant opportunities and determine eligibility for grants and other awards. Pre-award activities and processes performed by OSP staff are designed to assist faculty and staff with the overall grant-making process, including ideation and proposal and budget development, and help principal investigators (PIs) submit high-quality, competitive proposals while balancing the need for institutional and sponsor regulatory compliance. Pre-award responsibilities and services provided through OSP include:

- Identifying potential funding sources.
- Helping with pre-submission procedures.
- Assisting with internal review, routing, and approval processes.
- Submitting proposals in a timely manner to the sponsor agencies.



A.Proposal Development and Submission Guidelines Task A.1 Proposal Pre-Award Meeting WSSU Related Policy #: 400.6, 400.7, 400.11 Federal Policy: 2 CFR 200 Subpart C

Procedural Guidelines

The purpose of the initial Pre-Award Meeting is to cultivate proposal concepts and offer pre-award services to a PI.

- 1. PI contacts the Pre-Award Administrator regarding a funding opportunity (and/or) submits an Internal Notice of Intent (INOI) to notify the Pre-Award Administrator of their desire to submit a proposal.
- 2. Pre-Award Administrator schedules a meeting to discuss the following:
 - Funding Opportunity Announcement (FOA)/Notice of Funding Opportunity (NOFO)/Request for Proposals (RFP) Guidelines.
 - Project conceptualization, goals, objectives, target audience/participants, etc.
 - Preliminary budgetary needs of the proposal.
 - Required documents for Cayuse, WSSU's Electronic Research Administration (eRA) System.
 - Timeline for submission to OSP and the funding agency.
- 3. Pre-Award Administrator sets internal calendar reminders for project/proposal submission tasks.
- 4. Pre-Award Administrator notifies Director of OSP and Associate Provost for Research & Innovation about pending application.

Personnel Responsible Procedural Workflow The workflow includes collaboration between the Pre-Award Ms. Tonia Martinez Administrator and the PI of proposal, and then submission to the martinezta@wssu.edu Director of OSP and Associate Provost for Research for proposal review. Dr. Keith McCullough mcculloughak@wssu.edu Pre-Award Director & Principal Administrator Associate Provost Investigator

A. Proposal Development and Submission Guidelines

Task A.2 Budget Development WSSU Related Policy #: 500.2, 101.11, 102.5, 103.2

Procedural Guidelines

The purpose of budget development is to ensure compliance with institutional and agency financial guidelines.

- 1. Pre-Award Administrator helps calculate the following using the OSP Budget Development template (Excel document):
 - a. Personnel costs (UNC Salary Dashboard)
 - b. Institutional fringe benefits costs [39% Full-time Academic Year; 29% Faculty Summer; 7.65% Part-time Personnel (students included)].
 - c. Travel Costs.
 - d. Equipment Costs (e.g., equipment over \$5,000).
 - e. Supplies Costs.
 - f. Construction Costs.
 - g. Contractual Costs (e.g., subawards, evaluators, software licenses, etc.).
 - h. Training/Participant costs (e.g., student/fellow costs).
 - i. Other Direct Costs (e.g., tuition, stipends, etc.).
 - j. Indirect Costs (42% modified total direct costs [MTDC])
- 2. Pre-Award Administrator inquires about cost-sharing needs, grant release requests, and additional personnel capacity costs before finalizing budget.
- 3. Pre-Award Administrator reviews final preliminary budget and provides budget narrative template for PI.
- 4. PI completes budget justification and Pre-Award Administrator reviews and approves budget justification.
- 5. Pre-Award Administrator notifies Director of OSP to review and approve budget and budget narrative documents prior to proposal submission.
- 6. Director of OSP reviews, edits (as needed), approves budget and budget narrative and returns to Pre-Award Administrator.
- 7. Pre-Award Administrator returns final approved budget and budget narrative to PI.
- 8. PI uploads budget and budget narrative to Cayuse under the "Attachment" tab.

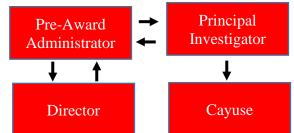
Personnel Responsible

Ms. Tonia Martinez martinezta@wssu.edu

Dr. Keith McCullough mcculloughak@wssu.edu

Procedural Workflow

The workflow includes collaboration between the Pre-Award Administrator, the PI, and the Director of OSP.



A.Proposal Development and Submission Guidelines		
Task	A.2.a Cost-Sharing/Cash Match ¹ Guidelines	WSSU Related Policy #:
		Cost Share/Match
		Federal Policy: 200.306

The purpose of cost sharing/matching is to provide institutional resources either in-kind or cash match to a proposal's activities. All cost-sharing must be pre-approved at either the institutional level or UNC System Office level.

- 1. Pre-Award Administrator assists the PI in determining which type of institutional resources are required, if any, for cost-sharing/matching funds using agency guidelines as outlined in the NOFO/RFP/FOA regarding cost-sharing/matching.
- 2. PI completes the <u>Cost-Sharing/Match request form</u> and submits through the appropriate levels of authorization <u>prior to</u> proposal submission and uploads to Cayuse or completes the electronic Cost-Sharing/Match request form in Cayuse.
 - a. In-kind personnel costs are calculated using time & effort percentages of the personnel's institutional base salary (UNC Salary dashboard)
 - b. Other in-kind costs (space allocation/utilities) are calculated using university facilities expenditure costs per square foot.
- 3. PI notifies Pre-Award Administrator that the cost share form has been completed.
- 4. Pre-Award Administrator reviews final preliminary budget and provides budget narrative template for PI after approvals are attained.
- 5. Pre-Award Administrator notifies Director of OSP to review budget and budget narrative documents prior to proposal submission.

Personnel Responsible **Procedural Workflow** The workflow includes collaboration between the Pre-Award Administrator and the PI, approvals from the PI's academic Ms. Tonia Martinez martinezta@wssu.edu supervisors, and then submission to the Director of OSP for proposal review. Dr. Keith McCullough Principal Pre-Award mcculloughak@wssu.edu Investigator Administrator Unit Leads Director

¹Cash matches much be approved at both the Chief Finance Officer (Vice Chancellor of Finance and Administration) level and at the Chancellor's level.

A.Proposal Development and Submission Guidelines		
Task	A.2.b Grant Release (Reassigned Time) Guidelines	WSSU Related Policy #:
		Grant Release
		<u>UNC Policy</u> : 300.2.6[G]

The purpose of grant release or reassigned time is to provide PIs with reallocated time in their work plan to engage in sponsored research activities.

- 1. PI communicates with their Department Chair to determine how much release time will be requested based on their research project.
- 2. PI logs into Cayuse and completes the "General Information" and "Investigator" tabs.
- 3. PI selects "Yes" on the "Grant Release" question under the "Investigator" tab in Cayuse. Selecting "Yes" will prompt the "Pre-Approval Grant Release Form" tab to activate.
- 4. PI selects the "Pre-Approval Grant Release Form" tab and completes the prompts on the form or completes and uploads the <u>Pre-Approval Grant Release Document</u> on the OSP webpage.
- 5. PI completes all modules in Cayuse and selects "Route for Review."
- 6. PI certifies the proposal record in Cayuse to forward the proposal for approval by department heads.
- 7. Department heads review and approve proposal record in Cayuse, which includes the grant release form.
- 8. Proposal record review is completed and approved by OSP and the Provost or designee.
- 9. Grant release is granted by department heads/dean, is entered into PeopleAdmin, and recorded by Contracts and Grants.

Personnel Responsible

Ms. Tonia Martinez martinezta@wssu.edu

Dr. Keith McCullough mcculloughak@wssu.edu

Procedural Workflow

This process is initiated by the PI and authorized by the Chair/Unit Lead/Dean, then approval forms are submitted to the OSP office, and must be included in the eRA application. Electronic versions of this form are also in Cayuse and are approved by the Chair/Unit Lead/Dean during the proposal application review in Cayuse.



B.Pre-Award Subrecipient Process		
Task	Pre-Award Subrecipient Monitoring Procedures	WSSU Related Policy #:
		<u>400.6, 400.7, 400.11</u>
		Federal Policy: 2 CFR 200
		Subpart C

Pre-Award Subrecipient Monitoring Procedures

- 1. Pre-Award Administrator begins initial notice of subrecipient process to:
 - a. Verify the entity project role determination subrecipient or contractor.
 - b. Obtain all subrecipient(s) contact information (investigator and administrative contacts) from the WSSU PI.
- 2. Pre-Award Administrator determines the type of subrecipient:
 - a. Federal Demonstration Partnership (FDP) Expanded Clearinghouse Institution Search the FDP Expanded Clearinghouse to verify if the subrecipient is a participant: https://fdpclearinghouse.org/.
 - b. Low Risk Subrecipient Not a potential high-risk entity or an FDP Expanded Clearinghouse Institution.
- 3. Pre-Award Administrator collects documentation from the subrecipient for the proposal. It is suggested that this be completed as early as possible, at least 3 weeks prior to the sponsor deadline, to allow the subrecipient to meet their internal deadlines.
 - a. Determine if an entity profile is needed in Cayuse. Look up the name of subrecipient in Cayuse "Admin" section.
 - b. Email the subrecipient contact requesting the following and include a deadline for the subrecipient to provide the information to WSSU:
 - i. *Entity Profile Form* (if needed) Attach blank form to email.
 - ii. *Letter of Intent* (LOI) (with applicable project information completed) Attach to email. The LOI should be completed to include the WSSU/project specific information at the top of the form. The subrecipient total budget/cost share amounts may also be included if predetermined by the WSSU project team.
 - iii. *Statement of Work* (SOW) The SOW provides sufficient detail of the technical and programmatic work to be accomplished by the Subrecipient. It should not be the overall project SOW.
 - iv. Budget (send blank sponsor form if applicable).
 - v. Budget Justification.
 - vi. Other required sponsor documents as necessary (biosketch, current and pending support, letter of support, etc.).
- 4. Pre-Award Administrator forwards information to the PI for review of subrecipient documentation:
 - Send the SOW, Budget, and Budget Justification to the WSSU PI for validation. The PI should review to ensure the proposed work and accompanying budget match expectations.
- 5. PI and Pre-Award Administrator complete budget preparation & review:
 - a. Budget the subrecipient in accordance with their role.

- b. Subrecipient = When using an MTDC base, budget the first \$25,000 with WSSU F&A rate. The remainder should be budgeted without WSSU F&A. Note: The first \$25,000 applies to the total budget over the full project period. For example: If the subrecipient budget is \$200,000 over 4 years (\$50,000 per year), F&A would only be applied to \$25,000 of the first-year budget. The remaining \$25,000 would not be included in the F&A base in year one. None of the subrecipient budget would be included in the base in years 2-4.
- c. Verify the appropriate F&A rate is used by the subrecipient (negotiated or *de minimis*). If the subrecipient does not have a federally negotiated F&A rate, they should include the 10% *de minimis* rate or provide evidence that they do not wish to claim it.
- d. Verify the subrecipient has appropriately applied fringe benefit rates.
- 6. Pre-Award Administrator conducts compliance review:
 - a. Review for debarred status (either in FDP Entity Profile or on the received Entity Profile). If debarred, advise the PI that they may need to find a replacement subrecipient if the status does not change prior to award.
 - b. Check the LOI for Human Subjects or Animals. Flag as applicable in Cayuse.
 - c. Verify if the Subrecipient has compliant financial conflict of interest (COI) policy (Section D of Entity Profile, FDP Certifications Tab, FDP financial COI Clearinghouse).
- 7. Pre-Award Administrator finalizes documentation:
 - a. Upload the LOI, SOW, Budget, and Justification to Cayuse.
 - b. Flag for potential high risk subrecipient on the route sheet (if applicable).
 - c. Follow up with the subrecipient if the Entity Profile was not received.

Personnel Responsible

Principal Investigators

Ms. Tonia Martinez martinezta@wssu.edu

Dr. Keith McCullough mcculloughak@wssu.edu

Procedural Workflow

OSP submits subrecipient requested documents to PI for approval before sending the subrecipient request to the Subrecipient to complete.



C.Limited Submissions Proposal Development Process		
Task	Limited Submissions Proposal Development Process	WSSU Related Policy #:
		<u>400.6</u> , <u>400.7</u> , <u>400.11</u>
		Federal Policy: <u>2 CFR 200</u>
		Subpart C

The purpose of the Limited Submissions Proposal Development Process is to have potential PIs draft a project summary for further consideration during the limited submissions funding opportunities. OSP will circulate opportunities with limited submission criteria and include a deadline for internal submission of information as part of the limited submission decision-making process. There are several limited submission categories proposed by funding agencies (see table below):

Limitation	Action
Limited by the number of applications	Submit an INOI at least 6 weeks before the agency's due
per institution	date
Limited by the number of applications	Submit an INOI at least 6 weeks before the agency's due
per college	date
Limited by the number of applications	Coordinate with the department chair and notify OSP of
per department	departmental approval for submission
"Limited by" is not listed on the	Contact OSP with solicitation information and the due
funding opportunity	date

Procedure for limited submission competition:

- 1. PI submits an <u>Internal Notice of Intent</u> (INOI) form to the OSP by the INOI deadline set for the limited submissions process.
 - a. The INOI is used by OSP to schedule proposal submissions and to determine proposal requirements, deadlines, and other specific guidelines based on the desired solicitation.
 - b. An internal competition will be held if OSP receives more INOIs than can be submitted by a single institution. If the number of INOIs submitted by the internal deadline are less than or equal to the number of proposals that can be submitted by a single institution, there will be no competition and OSP will contact the prospective PIs to schedule a proposal development meeting.
 - c. If an internal competition is required, the Pre-Award Administrator will request a project summary/abstract from PIs who submitted prior to the INOI submission deadline. The project summary/abstract is used to give a brief overview of the proposed project.
- 2. OSP compiles all proposal summaries/abstracts received to initiate review.
 - a. OSP reviews the INOIs and proposal summaries/abstracts to ensure that all essential information has been provided by the prospective PIs.
 - b. OSP will forward the summaries/abstracts from prospective PIs to the Associate Provost for Research & Innovation for review.
 - c. In some cases, the Associate Provost for Research & Innovation may request additional information, which may include coinvestigators/collaborators, biosketches, need for departmental resources or other institutional resources, etc.

- 3. The Provost's Office (i.e., specifically designated Associate Provosts) will review and assess all proposal summaries/abstracts for submission worthiness.
 - a. The Associate Provosts will review the relevant funding announcement.
 - b. The Associate Provosts will determine impact (i.e., number of students or number of faculty or overall impact of proposal to include relationship to the Strategic Plan) based upon the guidelines of the funding announcement.
 - c. The Associate Provosts will examine and assess the summaries/abstract for academic/intellectual merit and proposal readiness according to the relative funding announcement.
 - d. If investigative team documentation is requested, the Associate Provosts will assess the strengths of the team, including qualifications, productivity (i.e., prior extramural funding, publication record, etc.), and experience leading multi-investigator projects/teams.
 - e. The Associate Provost for Research & Innovation will compile the results and communicate to the Pre-Award Administrator the decision.
- 4. The Pre-Award Administrator contacts PI(s) to inform them either that they were not selected or that they were selected to submit to the respective funding agency.
- 5. PI(s) follows the Proposal Development process.

Personnel Responsible Procedural Workflow This process is initiated by the PI and authorized by Unit Leads Ms. Tonia Martinez and OSP. martinezta@wssu.edu **Sponsored** Principal Unit Leaders Programs Investigator Dr. Keith McCullough mcculloughak@wssu.edu Dr. Shawn E. Holt Associate Provost holtse@wssu.edu for Research

D.Pre-Approval Requirements		
Task	Pre-approval Requirements	WSSU Related Policy #:
		<u>103.2, 104.3</u>
		<u>UNC Policy</u> : 300.2.11 [G]:

The purpose of these Pre-Approval Guidelines is to provide a clear procedural checklist for all sponsored programs pre-approval tasks in the Pre-Award phase.

1. REQUEST FOR COST-SHARING/MATCH FORM

PI completes this form and obtains the required signatures, then uploads it to the Cayuse eRA system.

2. PRE-APPROVAL FORM FOR GRANT RELEASE TIME

PI Release/Reassign time must be approved for all faculty and staff at the proposal stage. This form must be completed and submitted along with the proposal package in the Cayuse eRA system.

3. OVERLOAD ACTIVITY APPROVAL FORM

If participating in a project will cause a possible work overload, the overload must be approved in lieu of the release time at the departmental and School/College levels. This will only be approved on a case-by-case basis in accordance with the policy.

Personnel Responsible **Procedural Workflow** These approvals are initiated by the PI and authorized by the **Principal Investigators** Chair/Unit Lead, then approval forms are submitted to the OSP office and must be included as part of the application in the Ms. Tonia Martinez Cayuse eRA system. martinezta@wssu.edu Chair/Unit Dr. Keith McCullough Lead mcculloughak@wssu.edu 1 Principal Pre-Award Director Investigator Administrator

III. POST-AWARD

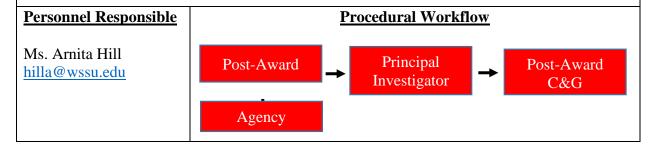
OSP's Post-Award staff are responsible for receiving sponsored program awards for the University to ensure legal and compliance review, review of award terms and conditions with the Principal Investigator (PI) during the Project Briefing, coordination of project initiation to establish the budget account in the University's financial report system (BANNER), and satisfaction of all programmatic matters during the life of the project, including spend rate and the closeout phase.

The Office of Contracts and Grants Accounting (C&G) is responsible for the fiscal monitoring of sponsored program awards. C&G will ensure that expenditures are made in accordance with the approved budget, financial reports and invoices are submitted in a timely manner, and all fiscal matters have been satisfied during the life of the project, including the closeout phase.



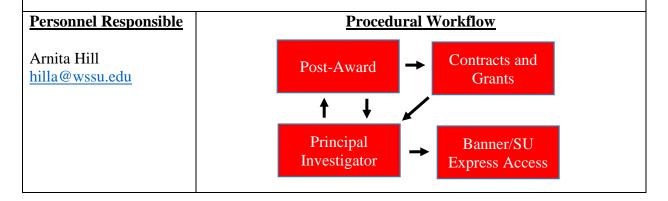
A. Award Set-up Meeting		
Task	A.1 Award Set-up Briefing	WSSU Related Policy #: <u>400.6</u> , <u>400.7</u> , <u>400.11</u>
		Federal Policy: <u>2 CFR 200 Subpart D</u>

- 1. Post-Award Administrator receives and reviews Notice of Award (NOA).
- 2. Post-Award Administrator submits Project Briefing Request to PI. Project briefing is only required for new PIs; returning PIs are offered the opportunity to have a project briefing, although it is not required.
- 3. PI attends project briefing meeting with the Post-Award Administrator and C&G staff.
- 4. The following information is discussed in the project briefing (new PIs) or as part of an instructional email (returning PIs).
 - a. Terms and conditions of the award from the agency.
 - b. Allowable approved budgetary items per institution policy and terms and conditions of award.
 - c. Required budget documents to set up Banner fund account.
 - d. Budget Create Form form used to setup the internal line items within the Banner fund account based on the approved budget and proposal budget justification/narrative.
 - e. <u>Banner Request Fund Form</u> form grants the PI authority as manager of the Banner fund account.
 - f. Consultant/Contractual Process (where budget has subawards/vendors).
 - g. Subrecipient Information Form and deadlines for submission.
 - h. Vendor Registration Form submission process online.
 - i. University Policies.
 - j. Forms required by C&G (addressed by C&G Office during project briefing).
 - k. Banner funding account training instructions.
 - 1. How to register with Finance and Administration (F&A).
 - m. Overview of where to locate F&A Manuals.
 - n. Agency reporting requirements from terms and agreement.
 - o. Procedures for submission of requests to agency (should always be initiated by the PI to the agency).
 - i. Changes to scope.
 - ii. Changes to effort amount.
 - iii. Budget revision request.
 - iv. PI change request.
 - v. Personnel changes to overall grant.
 - vi. Extension request.
 - p. Any other questions or concerns the PI may like to address.



A. Award Set-up Meeting		
Task	A.2 Establishing a Budget	WSSU Related Policy #:
		<u>400.6</u> , <u>400.7</u> , <u>400.11</u>
		Federal Policy: 2 CFR 200
		Subpart E

- 1. Post-Award Administrator completes a Budget Create Form. The budget create form is based upon the budget approved by the agency and the budget justification submitted to the agency by the PI. (Based on the agency approved budget, some details of the justification may require modification.)
- 2. Budget Create Form is submitted to the PI by the Post-Award Administrator for review, approval, and authorization from the PI.
- 3. Banner Request Form also is completed by the Post-Award Administrator and submitted to the PI for review and approval from the PI, the PI's chair, and their dean.
 - This form grants the PI authority as manager over the Banner fund account.
- 4. PI returns both the Budget Create Form and Banner Request Form to the Post-Award Administrator to review, to sign and approve, and to route to C&G to create a Banner fund account for the PI.
- 5. C&G makes a request to Financial Systems to create a Banner fund account on behalf of the PI.
- 6. C&G sends an email notification to the PI when the Banner fund account is ready for activity. (This process usually takes about 2 weeks.)
- 7. The Post-Award Administrator sends an email to the PI to schedule required Banner training to give the PI access to their account(s) as a Banner Fund Manager.

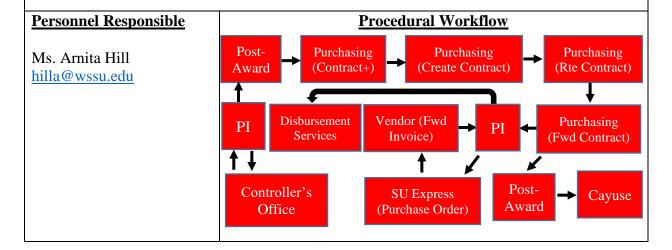


B. Subrecipient Preparation Guidelines		
Task	B.1 Establishing an Independent Contract	WSSU Related Policy #:
		<u>900.13, 400.5</u>
		Federal Policy: 2 CFR 200
		Subpart E

- 1. PI completes an <u>Independent Contractor Certification Form</u>, which is automatically routed to the Controller's Office for signature to confirm if the work on the contract is being completed by an independent contractor or employee.
- 2. The Independent Contractor Certification Form is routed back to the PI after the Controller's Office verifies the status of the independent contractor.
- 3. PI submits the <u>Subrecipient Form</u> and Independent Contractor Certification Form to the Post-Award Administrator.
 - a. Contractual information such as the Scope of Services and amount of compensation should be a part of the proposal submission application.
 - b. The amount of compensation should be verified by PI based upon the agency-approved budget.
 - c. Confirmation of available funds/remaining balance should be made by PI prior to submission of subrecipient form.
 - d. Submission of subrecipient form to Post-Award Administrator should be submitted electronically by the PI 30 days prior to the start date of period of performance. Thirty days are required if there is a need for any 1 of the following:
 - i. Negotiating contract terms (All changes must be reviewed and approved by Legal).
 - ii. Discussing the scope of work, period of performance, and amount of compensation, all of which should have been previously determined between the PI and the Contractor.
 - iii. Change of Contractor approving personnel.
 - iv. If edits or revisions are required to the independent contract(or) agreement.
- 4. Post-Award Administrator completes a Contract Request Form and uploads the approved Independent Contract Certification Form in Contract+ and submits the documents to Purchasing.
- 5. Purchasing creates an independent contract and routes the independent contract to the appropriate signatories of the University and the Vendor for signatures.
- 6. Purchasing forwards the fully executed independent contract agreement to the PI and the Post-Award Administrator.
- 7. Post-Award Administrator uploads the fully executed independent contract in Cayuse.
- 8. The PI enters a Purchase Order (PO) into SU Express for the full amount of the contract with a copy of the fully executed contract attached.
 - a. <u>Vendor Registration Form</u>, if needed, is completed by the Independent Contractor and submitted to Purchasing Services. An email can be sent to

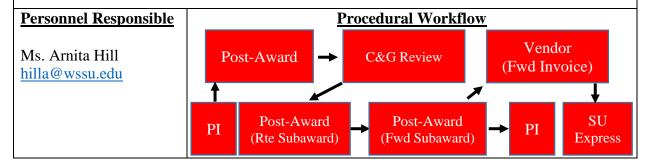
Purchasing at <u>acctpayablestaff@wssu.edu</u> to find out if a vendor registration form is needed.

- b. Use account 919900 for all contracts for services.
- c. Check the Standing Order box on the requisition so that Purchasing Services knows to create the PO as a Standing/Open Order. This way, multiple invoices can be received and paid against the PO for each service that has been rendered.
- 9. A PO is issued to the Company, Contractor, Individual, or University with a copy of the fully executed Agreement attached.
- 10. The Company, Contractor, Individual, or University sends an invoice to the PI referencing the PO number on the invoice.
- 11. PI sends an email to Disbursement Service (<u>acctpayablestaff@wssu.edu</u>) to request payment of the invoice against the PO.



B. Subrecipient Preparation Guidelines		
Task	B.2 Establishing a Subaward Contract	WSSU Related Policy #: 900.13,
		<u>400.5</u>
		Federal Policy: <u>2 CFR 200 Subpart E</u>

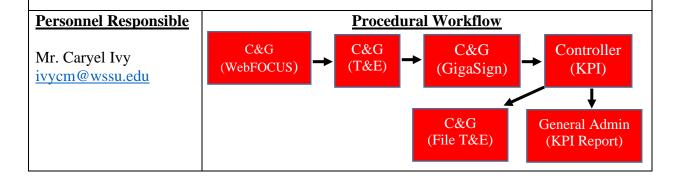
- 1. PI submits a Subrecipient Form to the Post-Award Administrator.
 - a. Contractual information such as the Scope of Services and amount of compensation should be a part of the proposal submission application.
 - b. The amount of compensation should be verified by PI based upon the agency-approved budget.
 - c. Confirmation of available funds/remaining balance should be made by PI prior to submission of subrecipient form.
 - d. Submission of subrecipient form to Post-Award Administrator should be submitted electronically by the PI 30 days prior to the start date of period of performance. Thirty days are required if there is a need for any 1 of the following:
 - i. Negotiating contract terms (All changes must be reviewed and approved by Legal).
 - ii. Discussing the scope of work, period of performance, and amount of compensation, all of which should have been previously determined between the PI and the Contractor.
 - iii. Change of Contractor approving personnel.
 - iv. Or if edits or revisions are required to the independent contract(or) agreement.
- 2. Post-Award Administrator completes a Subaward Agreement.
- 3. Post-Award Administrator forwards the independent contract agreement to C&G for review and approval. C&G returns to Post-Award Administrator for processing.
- 4. Post-Award Administrator routes the approved subaward agreement to the appropriate signatories of the University and the Vendor for signatures.
- 5. Post-Award Administrator forwards copies of the fully executed independent contract agreement to the PI, the Vendor, and C&G.
- 6. Post-Award Administrator uploads the fully executed independent contract to Cayuse.
- 7. Vendor submits invoices for services rendered based upon the independent contract agreement.
- 8. PI uploads the vendor's invoice(s) to SU Express for processing and payment.



C.Certification of Time and Effort Guidelines		
Task	Certification of Time and Effort Procedures	WSSU Related Policy #: 102.1: 102.7: 104.3: 104.6 Federal Policy: 2 CFR 200.430

Steps for Completing Monthly Time and Effort (T&E) Reports

- 1. C&G runs NHIDIST payroll report in WebFOCUS to retrieve monthly salary amounts paid from extramural funding/grant awards.
- 2. C&G updates the T&E spreadsheet with monthly salary amounts.
- 3. C&G uploads and routes the T&E spreadsheet in GigaSign (Adobe Product) to acquire multiple signatures simultaneously.
 - a. T&E forms are sent for signatures from the employee, supervisor, PI, Title III Director, and C&G.
 - b. Forms are required to be returned C&G by the 15th of each month.
- 4. C&G submits T&E to the Controller's Office for the key performance indicators (KPI) report.
- 5. Controller's Office includes this head count in the University's monthly KPI report submitted to General Administration (GA). This report is due on the 20th of every month.
- 6. C&G files electronic copies of the T&E for each individual employee paid from a grant.



D.Steps For Closeout Process		
Task	Steps For Closeout Process	WSSU Related Policy #: 900.7:
		<u>500.2</u> :
		Federal Policy: 2 CFR 200.344

Steps For Closeout Process

- 1. Closeout process begins more than 90 days prior to the project deadline (example, if a project is scheduled to end in May, then the process starts in February to ensure 90 days remains before the end date to complete the 90-Day Pre-Closeout Notice in time), followed by the other forms.
- 2. Post-Award Administrator reviews the monthly Burn Rate Report generated by the Office of Information Technology to obtain the list of projects to close each month. (It lists the proposal status for awards that are at least 120 days away from closing.)
- 3. Post-Award Administrator uses the Project Number on the list to search in Cayuse for the details associated with each award, which is necessary to begin the closeout process. Each record with details is printed out as required.
- 4. Post-Award Administrator prepares a Closeout Tracking Sheet for each project to document actions taken.
- 5. Post-Award Administrator goes to the "G" drive and selects "Post-Award," "Closeout", "Use New Closeout Forms," and then opens the "Begin Closeout Process" document to prepare emails to send to PIs in accordance with the list of projects to be closed.
- 6. Post-Award Administrator lists all the projects on the Master Closeout Spreadsheet once all the emails are sent to the PIs, which will help with monitoring the closeout status of each award until all projects for the month are completely closed.
- 7. Post-Award Administrator places all documents in the Post-Award Administrator's electronic closeout folder for the month until each project is closed.
- 8. Post-Award Administrator signs off on the Closeout Tracking Sheet when all required closeout documents are received for a project and gives the closeout packet to the Director to review and initial for completion.
- 9. Post-Award Administrator uploads the Closeout Tracking Sheet into Cayuse and moves the award record status to "Closed."

Ms. Arnita Hill hilla@wssu.edu Dr. Keith McCullough mcculloughak@wssu.edu Principal Investigator Procedural Workflow Post-Award Director Cayuse

III. RESEARCH COMPLIANCE

Research conducted at Winston-Salem State University is subject to a wide range of federal and state policies established to ensure ethical conduct in research. OSP ensures that Winston-Salem State University is committed to achieving the highest standards of excellence and integrity in all its research endeavors by promoting ethical conduct of research. One of the primary goals of OSP is to educate the Winston-Salem State University research community about regulatory requirements and ethical standards governing research. OSP also ensures that principal investigators (PIs) are responsible for ensuring compliance with all applicable regulations and policies.



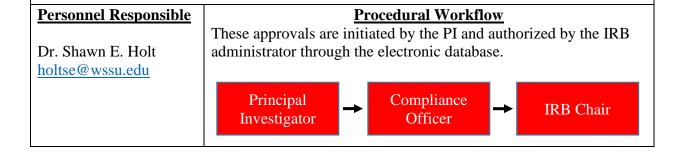
A.Institutional Review Board (IRB) [Human Research] Task | Conducting Human Research-Institutional Review | WSSU Related Policy #: 400.3, 400.9 | UNC Policy:500.7: | Federal Policy: 45 CFR 46

Procedural Guidelines

- 1. PI should review the WSSU IRB Manual and the Guide for the IRB Process.
- 2. PI and any co-PIs/collaborators should complete the required <u>CITI training</u>, including "Responsible Conduct of Research", "Human Ethics", and any other IRB-related training courses, and then upload completion certificate to IRB module.
- 3. PI should complete the online electronic IRB submission process through *CAYUSE Human Ethics*. PIs should expect 7-10 business days to complete the review process.
- 4. For renewals, IRB approvals are usually valid for 1 year. Before the approval term expires, the electronic database will send out a notice.
- 5. PIs should amend their IRB approval for an extension or acknowledge the completion of the approved protocols.
- 6. PIs should retain IRB records and accompanying documentation for as long as they are scientifically useful.

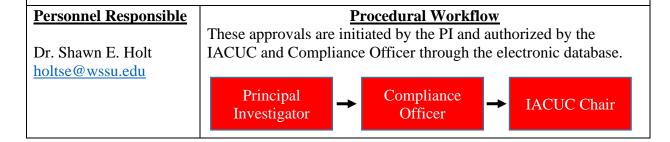
WSSU Federal Wide Assurance (FWA) number: FWA00000214

The Federal wide Assurance (FWA) is the only type of assurance of compliance accepted and approved by OHRP for institutions engaged in non-exempt human subjects research conducted or supported by HHS. Under an FWA, an institution commits to HHS that it will comply with the requirements set forth in 45 CFR part 46, as well as the Terms of Assurance.



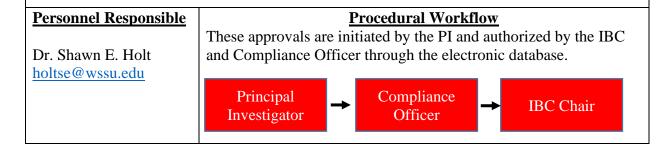
B.Institutional Animal Care and Use Committee (IACUC)TaskAnimal Research-Institutional Animal Care and Use
Committee (IACUC)WSSU Related Policy #:
400.3, 400.9
UNC Policy:500.7:
Federal Policy: GLA 8th Edi

- 1. PIs should review the <u>WSSU IACUC procedural manual</u> relevant for the animal research process.
- 2. The PI should submit their IACUC protocol and complete the Winston-Salem State University IACUC Application for approval of research involving vertebrate animals through the online system *Cayuse Animal Oversight*.
- 3. For initial review, once an IACUC protocol is received by the Compliance Officer, the type of review a proposal will receive (executive or full committee) will be based on the expected level of animal discomfort and the types of procedures will be verified. Completeness of the protocol will also be checked at this time.
- 4. The IACUC considers new protocols requiring full committee review, and a meeting will then be scheduled; possible outcomes of the Committee's review include approval, approval pending modification(s) and/or clarification(s), or disapproval.
- 5. In cases of a FULL REVIEW The Committee reviews the protocols prior to the meeting and comments on any concerns or points requiring clarification and/or stipulations. The protocol is then open for discussion by the Committee, which includes the veterinarian.
- 6. In cases of EXECUTIVE REVIEW The chair alone (or their designee from the Committee) reviews and approves protocols falling in this category. This category includes continuing reviews, previously approved protocols that have been resubmitted or identical protocols submitted to different funding agencies, protocols with no direct animal use (e.g. funds will be used for salary support only [as part of a previously approved protocol]), or use of shared animal products or slaughterhouse materials.
- 7. Investigator will receive timely notification of IACUC decisions. If a protocol receives approval, the investigator is provided with a Letter of Approval certifying the protocol. In cases where the IACUC requires clarification(s) or modification(s), the investigator is notified by the Compliance Officer. In such cases, the approval is issued following receipt of an acceptable response from the investigator. In cases of a tabled or disapproved protocol, the investigator is notified by the Chair and advised as to available options.



C.Institutional Biosafety Committee (IBC) [Biomedical Research]		
Task	Biomedical Research- Institutional Biosafety	WSSU Related Policy #:
	Committee (IBC)	<u>400.3, 400.9</u>
		UNC Policy:500.7:
		Federal Policy: GLA 8 th Edi

- 1. PI should review the WSSU IBC procedural manual for the biosafety process.
- 2. PI must complete Winston-Salem State University IBC protocol application for the Use of Biohazardous Materials, Recombinant DNA, and Infectious Agents and submit to the IBC through the online system *Cayuse Hazard Safety*.
- 3. For initial review, upon receipt of a protocol by the Compliance Officer, the type of review a proposal will receive (exempt or full committee) will be based on the expected level of risks and types of procedures. Completeness of the protocol will also be checked at this time.
- 4. The IBC considers new protocols requiring full committee review, and a meeting is scheduled. Possible outcomes of the Committee's review include approval, approval pending modification(s) and/or clarification(s), or disapproval.
- 5. In the case of a FULL REVIEW The Committee reviews the protocols prior to the meeting and comments on any concerns or certain points requiring clarification and/or stipulations. The protocol is then open for discussion by the Committee, which includes a veterinarian.
- 6. In the case of an EXECUTIVE REVIEW The chair alone (or their designee from the Committee) reviews and approves protocols. This category includes continuing reviews, previously approved protocols that have been resubmitted or identical protocols submitted to different funding agencies, protocols with no direct biosafety concerns (e.g., funds used for salary support only [as part of a previously approved protocol]).
- 7. If a protocol receives approval, the investigator is provided with a Letter of Approval certifying the approval. In cases where the IBC requires clarification(s) or modification(s), the investigator is notified by the Compliance Officer. In such cases, the approval is issued following receipt of an acceptable response from the investigator. In cases of a tabled or disapproved protocol, the investigator is notified by the Chair and advised as to available options.



IV. ELECTRONIC RESEARCH ADMINISTRATION SYSTEM (eRA) – CAYUSE

Electronic Research Administration (eRA) refers to electronic or web-based submission of proposals, reports, and electronic draw-down of funds. Broadly, the term refers to electronic or web-enabled transactions between proposers, sponsors, and awardees. OSP at Winston-Salem State University's eRA System is the Cayuse Research Suite, a cloud-based research administration solution that bridges the gap between manual processes and a state-of-the-art system for internal proposal routing and approval, proposal tracking, and award management. Cayuse provides a more effective, efficient, and user-friendly experience than previous platforms used by OSP, significantly modernizing our electronic infrastructure and enhancing the reporting functionality for both researchers and administration.



A.Creating a Proposal Record in Cayuse		
Task	Creating a Proposal Record in Cayuse – Electronic Research Administration (eRA)	WSSU Related Policy #: 103.2, 104.3
		<u>UNC Policy</u> : 300.2.11 [G]:

The purpose of the eRA guidelines allows federal compliance with The Paperwork Reduction Act of 1995, which mandates that the federal government transact business electronically to the greatest possible extent; also, the E-Government Act of 2002 was signed into law on December 17, 2002.

- 1. PI logs into <u>Cayuse</u> using their University credentials. Gain access to Cayuse on the OSP webpage.
- 2. PI selects "Sponsored Projects" from the "Products" dropdown list.
- 3. PI clicks on "Start New Proposal" to create a new proposal record.
- 4. PI completes all modules under "Proposal Sections". The proposal record is in the "In Development" status at this point.
- 5. PI moves the proposal record into "Under Review" status to route it for review and approval by the appropriate authorities.
- 6. PI and other senior key personnel on the project certify the proposal record when prompted to do so.
- 7. The proposal record is reviewed and approved by the PI and senior key personnel's unit leaders, the Office of Sponsored Programs Approver, and the Provost or the Provost's Approver when prompted.
- 8. The proposal record status is automatically changed from "Under Review" to "Approved" after the proposal review and approval is completed at the provost level.
- 9. OSP Cayuse Administrator changes the proposal record status from "Approved" to "Submitted to Sponsor".

Personnel Responsible Ms. Tonia Martinez martinezta@wssu.edu Dr. Keith McCullough mcculloughak@wssu.edu Principal Investigator Procedural Workflow These approvals are initiated and certified by the PI and authorized by Unit Leads, OSP, and the Provost's Office. Principal Investigator Provost's Office

B. Submitting a Proposal (S2S) in Cayuse		
Task	Submitting a Proposal (S2S) in Cayuse – Electronic	WSSU Related Policy #:
	Research Administration (eRA)	<u>103.2, 104.3</u>
		<u>UNC Policy</u> : 300.2.11 [G]:

The purpose of the Proposals (S2S) submission platform in Cayuse is to simply proposal submissions by submitting proposals directly from Cayuse into all federal grant portals.

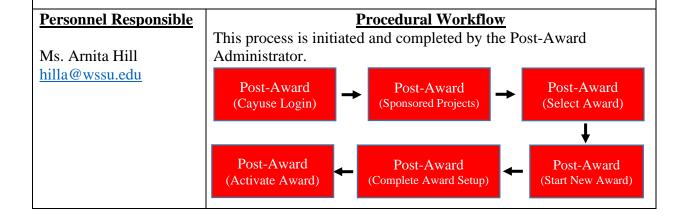
- 1. PI logs into <u>Cayuse</u> using their University credentials. Gain access to <u>Cayuse</u> on the OSP webpage.
- 2. PI selects "Proposals (S2S)" from the "Products" dropdown list.
- 3. PI clicks on "Create Proposal" to create a new proposal record or selects a proposal opportunity from under the "Opportunities" tab and select submission agency and click "Create Proposal." Newly created proposals will open up on the first form page of the proposal form.
- 4. PI clicks on the "Permission Key" to assign proposal permissions for users who need access to the proposal.
- 5. PI prepares the proposal and fills in data required for submission on all forms. The PI uses relevant guidelines to complete proposal application.
- 6. PI routes proposals to OSP for review and approval. The proposal record is reviewed and approved by the PI and senior key personnel's unit leaders, the Office of Sponsored Programs Approver, and the Provost or the Provost's Approver when prompted.
- 7. OSP links the proposal to the appropriate submission portal and submits the proposal to the sponsor agency.
- 8. OSP downloads PDF copy of proposal and uploads it into Cayuse Sponsored Projects proposal record.

Personnel Responsible Procedural Workflow This process is initiated by the PI and authorized by Unit Leads Ms. Tonia Martinez and OSP. martinezta@wssu.edu **Sponsored Principal Unit Leaders** Dr. Keith McCullough **Programs** Investigator mcculloughak@wssu.edu **OSP** Upload OSP Download **Submit** Proposal **Proposal Proposal**

C. Creating an Award Record in Cayuse		
Task	Creating an Award Record in Cayuse – Electronic	WSSU Related Policy #:
	Research Administration (eRA)	<u>103.2, 104.3</u>
		<u>UNC Policy</u> : 300.2.11 [G]:

The purpose of the award setup in Cayuse is to document and track award notifications and closeouts.

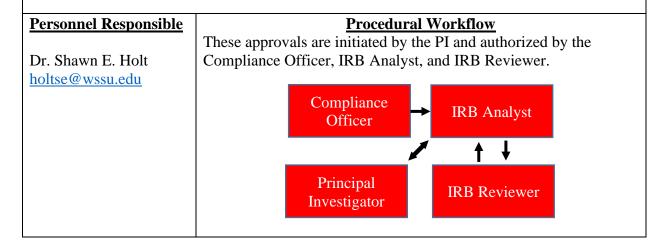
- 1. Post-Award Administrator logs into <u>Cayuse</u> using their University credentials. Gain access to <u>Cayuse</u> on the OSP webpage.
- 2. Post-Award Administrator selects "Sponsored Projects" from the "Products" dropdown list.
- 3. Post-Award Administrator completes "PI" search and selects appropriate proposal record.
- 4. Post-Award Administrator selects the "Awards" tab under the Award tab of the SP Dashboard.
- 5. Post-Award Administrator clicks on "Start New Award" to create a new award record.
- 6. Post-Award Administrator selects "Add To Existing Project" to associate the award record with the proposal record linked to the award. The award record is in the "Set Up In Progress" status at this point.
- 7. Post-Award Administrator selects "Create New Award From A Proposal," enters proposal record number, selects "Next" and "Create New Award."
- 8. Post-Award Administrator moves the proposal record into "Active" status after the award record setup is complete.



D. Submitting a Research Study Protocol in Cayuse		
Task	Submitting a Research Study Protocol in Cayuse –	WSSU Related Policy #:
	Electronic Research Administration (eRA)	<u>103.2, 104.3</u>
		<u>UNC Policy</u> : 300.2.11 [G]:

The purpose of the research study protocol review is to ensure that all research studies are conducted ethically and that the best interest of the research subjects is always at the forefront.

- 1. PI logs into <u>Cayuse</u> using their University credentials. Gain access to <u>Cayuse</u> on the OSP webpage.
- 2. PI selects "Human Ethics" from the "Products" dropdown list.
- 3. PI clicks on "Start New Study" to create a new IRB study record.
- 4. PI completes all modules under "Submission Details".
- 5. PI clicks "Submit" and moves the IRB study record into "Under Review". The IRB study record automatically forwards to the Compliance Officer.
- 6. Compliance Officer selects "Assign Analyst" for pre-review of the research study protocol.
- 7. Analyst receives IRB study record, completes pre-review, and assigns study record to an IRB Reviewer.
- 8. IRB Reviewer reviews IRB study record, completes review, and returns IRB study record to Analyst with comments, stipulations, and their decision on the protocol.
- 9. Analyst drafts IRB decision letter and forwards the letter to the PI. (If the PI receives an approval letter, they begin their research study. If the PI receives a stipulation letter, they address the stipulation(s), resubmit the IRB study record to the Analyst, and the review is implemented again by the Reviewer.



V. RELEVANT GUIDELINES

OSP is responsible for reviewing and approving the financial and business aspects of all proposals, awards, agreements, or contracts prior to submission to either the Provost and Vice Chancellor for Academic Affairs or external extramural research funding agencies. OSP reviews all proposed agreements involving the use of human subjects, animals, or biohazardous materials in research, as well as intellectual property considerations. Below are some relevant guidelines to patent application submissions, fixed assets, record retention processes, and budget, expenditures and reconciliations.



A.Patent/Intellectual Property/Tech Transfer Task Patent Application Submission WSSU Related Policy #: 400.7: 400.8 UNC Policy: 500.1: 500.2: 500.2.1: 500.2.2 Federal Policy: Bayh-Dole Act 35 USC Ch. 18

Procedural Guidelines

Submission of the Intellectual Property Disclosure Form

- 1. University personnel who, either alone or in association with others, make an invention in which the University has or may have an interest shall submit to the supervisor or department head an invention disclosure form entitled "Intellectual Property Disclosure Form (IP Form).
- 2. The supervisor or department head shall ascertain that the Intellectual Property Disclosure Form is prepared in conformity with guidelines and shall check its accuracy and completeness, especially with respect to the circumstances in which the invention was developed. The supervisor or department head shall add to the file whatever information s/he may have regarding the governmental and commercial value of the invention. The IP Form shall be forwarded to the Associate Provost for Research with supervisor or department head comments s/he may deem to be necessary or desirable. If the inventor specifically requests that the University determines his/her rights in the invention, the supervisor or department head shall state his/her conclusions with respect to such rights.
- 3. The *Chair of the Intellectual Property Committee* will promptly acknowledge receipt of completed IP Forms and the comments and recommendations of the supervisor or department head from the Associate Provost for Research.
- 4. The Intellectual Committee shall be appointed and will review each written disclosure and make recommendations promptly. The inventor or his or her representative shall be allowed to examine all written materials submitted to the Committee, to provide any additional written materials and, where practicable, to make an oral presentation to the Committee to clarify the potential associated with the ideas (inventions).
- 5. The Intellectual Property Committee will then decide on the proper disposition of the invention to secure the interests of the University, the inventor, the sponsor, if any, and the public. Its decision may include, but is not limited to, one or a combination of the following:
 - a. To submit the invention for review by a patent or invention management firm.
 - b. To make confidential inquiries of potential licensees as to their interest in the invention and their willingness to finance a patent application, where applicable.
 - c. To study the practicality of applying for a patent with university resources (an option with limited application because of financial constraints).
 - d. In certain cases, to release the University's rights to the inventor subject to an agreement to protect the interests of the University, the sponsor, if any, and the public, including an obligation to pay to the University a percentage of future royalties, where necessary, to recognize the University's contribution.

- e. To dedicate the invention to the public.
- f. To confirm that the University has no rights in the invention.
- 6. Within 90 days after receipt of the IP Form, the inventor will be notified in writing of the decision of the Committee on (1) the equities involved, including financial participation, (2) whether the University plans to file a patent application, or (3) whether the University will accept assignment of the invention for patenting, licensing, and/or commercial handling as applicable. If the University chooses neither to file a patent application, nor otherwise make available commercially, nor to dedicate to the public an invention in which it asserts its rights, the invention, at the Committee's discretion, may be released in writing to the inventor, with the permission of the sponsor, if any.

Personnel Responsible Procedural Workflow These approvals are initiated by the PI and authorized by the Dr. Shawn E. Holt Supervisor or department head, Associate Provost for Research, holtse@wssu.edu and Intellectual Property Committee through the electronic form. Associate Provost Principal Department for Research & Head/Supervisor Investigator Innovation Intellectual Property Committee

B. Fixed Assets Guidelines		
Task	Fixed Assets	WSSU Related Policy #:
		500.4: WSSU Fixed Assets
		Federal Policy: 2CFR
		200.439
		Fixed Assets, Depreciation

Fixed Assets Guidance: The purpose of these guidelines is to ensure that property acquired using federal funds is managed in accordance with the property standards noted in the Office of Budget Management (OMB) Circular <u>2CFR 200.439</u>. Property acquired using non-federal funds will be managed in accordance with the terms and conditions of the award.

Definitions

Property means, unless otherwise stated, real property, equipment, intangible property, and debt instruments.

Real property means land, including land improvements, structures and appurtenances thereto, but excludes movable machinery and equipment.

Equipment means tangible nonexpendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of \$5000 or more per unit. However, consistent with recipient policy, lower limits may be established.

Intangible property and debt instruments mean, but is not limited to, trademarks, copyrights, patents and patent applications and such property as loans, notes and other debt instruments, lease agreements, stock, and other instruments of property ownership, whether considered tangible or intangible.

General

The Fixed Asset Office will have oversight of property acquired with federal funds and funds from other agencies supporting sponsored program activities. The Office of Sponsored Programs will send to the Fixed Asset Office property provisions regarding ownership as noted in the award terms and conditions. These provisions will be used by the Fixed Asset Office to appropriately inventory, tag, and maintain property records.

Property acquired with federal funds is subject to property standards set by the Federal government per OMB <u>2CFR 200.439</u>. (also see below). Additional property management standards may be included in the grant agreement. All property requirements (use, reporting, maintenance, and disposition) must be met in accordance with applicable award terms and conditions.

When WSSU does not hold title to property acquired with funds because of a sponsored program, the property should not be capitalized, but the property must be inventoried for tracking purposes. Property acquired with sponsored program funds (federal or non-federal) are inventoried and flagged in the fixed assets system and physically tagged. The Fixed Asset Office Director will send to departments a listing of property that should be inventoried. Each department will be responsible for appointing staff within their department to conduct the inventory.

Property acquired with sponsored program funding (federal or non-federal) is not to be sold or transferred without following federal and other agency appropriate property disposition guidelines.

Property Standards (copied from OMB Circular 2CFR 200.439)

Purpose of property standards. 2 CFR 200.310 through 2 CFR 200.316 set forth uniform standards governing management and disposition of property furnished by the Federal Government whose cost was charged to a project supported by a Federal award. Federal awarding agencies shall require recipients to observe these standards under awards and shall not impose additional requirements, unless specifically required by Federal statute. The recipient may use its own property management standards and procedures provided it observes the provisions of 2 CFR 200.310 through 2 CFR 200.316.

<u>Insurance coverage.</u> Recipients shall, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired with Federal funds as provided to property owned by the recipient. Federally-owned property need not be insured unless required by the terms and conditions of the award.

Real property. Each Federal awarding agency shall prescribe requirements for recipients concerning the use and disposition of real property acquired in whole or in part under awards. Unless otherwise provided by statute, such requirements, at a minimum, shall contain the following.

- 1. Title to real property shall vest in the recipient subject to the condition that the recipient shall use the real property for the authorized purpose of the project as long as it is needed and shall not encumber the property without approval of the Federal awarding agency.
- 2. The recipient shall obtain written approval by the Federal awarding agency for the use of real property in other federally-sponsored projects when the recipient determines that the property is no longer needed for the purpose of the original project. Use in other projects shall be limited to those under federally-sponsored projects (i.e., awards) or programs that have purposes consistent with those authorized for support by the Federal awarding agency.
- 3. When the real property is no longer needed as provided in paragraphs (a) and (b), the recipient shall request disposition instructions from the Federal awarding agency or its successor Federal awarding agency. The Federal awarding agency shall observe one or more of the following disposition instructions.
 - a. The recipient may be permitted to retain title without further obligation to the Federal Government after it compensates the Federal Government for that percentage of the current fair market value of the property attributable to the Federal participation in the project.
 - b. The recipient may be directed to sell the property under guidelines provided by the Federal awarding agency and pay the Federal Government for that percentage of the current fair market value of the property attributable to the Federal participation in the project (after deducting actual and reasonable selling and fix-up expenses, if any, from the sales proceeds). When the recipient is authorized or required to sell the property, proper sales procedures

- shall be established that provide for competition to the extent practicable and result in the highest possible return.
- c. The recipient may be directed to transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the recipient shall be entitled to compensation for its attributable percentage of the current fair market value of the property.

Federally-owned and exempt property.

- 1. Federally-owned property.
 - a. Title to federally-owned property remains vested in the Federal Government. Recipients shall submit annually an inventory listing of federally-owned property in their custody to the Federal awarding agency. Upon completion of the award or when the property is no longer needed, the recipient shall report the property to the Federal awarding agency for further Federal agency utilization.
 - b. If the Federal awarding agency has no further need for the property, it shall be declared excess and reported to the General Services Administration, unless the Federal awarding agency has statutory authority to dispose of the property by alternative methods (e.g., the authority provided by the Federal Technology Transfer Act (15 U.S.C. 3710 (I)) to donate research equipment to educational and non-profit organizations in accordance with E.O. 12821, "Improving Mathematics and Science Education in Support of the National Education Goals.") Appropriate instructions shall be issued to the recipient by the Federal awarding agency.
- 2. Exempt property. When statutory authority exists, the Federal awarding agency has the option to vest title to property acquired with Federal funds in the recipient without further obligation to the Federal Government and under conditions the Federal awarding agency considers appropriate. Such property is "exempt property." Should a Federal awarding agency not establish conditions, title to exempt property upon acquisition shall vest in the recipient without further obligation to the Federal Government.

Equipment

- 1. Title to equipment acquired by a recipient with Federal funds shall vest in the recipient, subject to conditions of this section.
- 2. The recipient shall not use equipment acquired with Federal funds to provide services to non-Federal outside organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute, for as long as the Federal Government retains an interest in the equipment.
- 3. The recipient shall use the equipment in the project or program for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds and shall not encumber the property without approval of the Federal awarding agency. When no longer needed for the original project or program, the recipient shall use the equipment in connection with its other federally-sponsored activities, in the following order of priority:

- (i) Activities sponsored by the Federal awarding agency which funded the original project, then
- (ii) Activities sponsored by other Federal awarding agencies.
- 4. During the time that equipment is used on the project or program for which it was acquired, the recipient shall make it available for use on other projects or programs if such other use will not interfere with the work on the project or program for which the equipment was originally acquired. First preference for such other use shall be given to other projects or programs sponsored by the Federal awarding agency that financed the equipment; second preference shall be given to projects or programs sponsored by other Federal awarding agencies. If the equipment is owned by the Federal Government shall be permissible if authorized by the Federal awarding agency. User charges shall be treated as program income.
- 5. When acquiring replacement equipment, the recipient may use the equipment to be replaced as trade-in or sell the equipment and use the proceeds to offset the costs of the replacement equipment subject to the approval of the Federal awarding agency.
- 6. The recipient's property management standards for equipment acquired with Federal funds and federally-owned equipment shall include all of the following.
- 7. Equipment records shall be maintained accurately and shall include the following information:
 - a. A description of the equipment.
 - b. Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number.
 - c. Source of the equipment, including the award number.
 - d. Whether title vests in the recipient or the Federal Government.
 - e. Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost.
 - f. Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government).
 - g. Location and condition of the equipment and the date the information was reported.
 - h. Unit acquisition cost.
 - i. Ultimate disposition data, including date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the Federal awarding agency for its share.
- 8. Equipment owned by the Federal Government shall be identified to indicate Federal ownership.
- 9. A physical inventory of equipment shall be taken and the results reconciled with the equipment records at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The recipient shall, in

- connection with the inventory, verify the existence, current utilization, and continued need for the equipment.
- 10. A control system shall be in effect to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented; if the equipment was owned by the Federal Government, the recipient shall promptly notify the Federal awarding agency.
- 11. Adequate maintenance procedures shall be implemented to keep the equipment in good condition.
- 12. Where the recipient is authorized or required to sell the equipment, proper sales procedures shall be established which provide for competition to the extent practicable and result in the highest possible return.
- 13. When the recipient no longer needs the equipment, the equipment may be used for other activities in accordance with the following standards. For equipment with a current per unit fair market value of \$5000 or more, the recipient may retain the equipment for other uses if compensation is made to the original Federal awarding agency or its successor. The amount of compensation shall be computed by applying the percentage of Federal participation in the cost of the original project or program to the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient shall request disposition instructions from the Federal awarding agency. The Federal awarding agency shall determine whether the equipment can be used to meet the agency's requirements. If no requirement exists within that agency, the availability of the equipment shall be reported to the General Services Administration by the Federal awarding agency to determine whether a requirement for the equipment exists in other Federal agencies. The Federal awarding agency shall issue instructions to the recipient no later than 120 calendar days after the recipient's request and the following procedures shall govern:
 - a. If so instructed or if disposition instructions are not issued within 120 calendar days after the recipient's request, the recipient shall sell the equipment and reimburse the Federal awarding agency an amount computed by applying to the sales proceeds the percentage of Federal participation in the cost of the original project or program. However, the recipient shall be permitted to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for the recipient's selling and handling expenses.
 - b. If the recipient is instructed to ship the equipment elsewhere, the recipient shall be reimbursed by the Federal Government by an amount which is computed by applying the percentage of the recipient's participation in the cost of the original project or program to the current fair market value of the equipment, plus any reasonable shipping or interim storage costs incurred.
 - c. If the recipient is instructed to otherwise dispose of the equipment, the recipient shall be reimbursed by the Federal awarding agency for such costs incurred in its disposition.
 - d. The Federal awarding agency may reserve the right to transfer the title to the Federal Government or to a third party named by the Federal Government when such third party is otherwise eligible under existing statutes. Such transfer shall be subject to the following standards:

- i. The equipment shall be appropriately identified in the award or otherwise made known to the recipient in writing.
- ii. The Federal awarding agency shall issue disposition instructions within 120 calendar days after receipt of a final inventory. The final inventory shall list all equipment acquired with grant funds and federally-owned equipment. If the Federal awarding agency fails to issue disposition instructions within the 120-calendar day period, the recipient shall apply the standards of this section, as appropriate.
- iii. When the Federal awarding agency exercises its right to take title, the equipment shall be subject to the provisions for federally-owned equipment.

Supplies and other expendable property

- 1. Title to supplies and other expendable property shall vest in the recipient upon acquisition. If there is a residual inventory of unused supplies exceeding \$5000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other federally-sponsored project or program, the recipient shall retain the supplies for use on non-Federal sponsored activities or sell them, but shall, in either case, compensate the Federal Government for its share. The amount of compensation shall be computed in the same manner as for equipment.
- 2. The recipient shall not use supplies acquired with Federal funds to provide services to non-Federal outside organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute as long as the Federal Government retains an interest in the supplies.

Intangible property

- 1. The recipient may copyright any work that is subject to copyright and was developed, or for which ownership was purchased, under an award. The Federal awarding agency(ies) reserves a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes, and to authorize others to do so.
- 2. Recipients are subject to applicable regulations governing patents and inventions, including government-wide regulations issued by the Department of Commerce at 37 CFR part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements."
- 3. The Federal Government has the right to:
 - a. obtain, reproduce, publish or otherwise use the data first produced under an award; and
 - b. authorize others to receive, reproduce, publish, or otherwise use such data for Federal purposes.
 - 4. In addition, in response to a Freedom of Information Act (FOIA) request for research data relating to published research findings produced under an award that were used by the Federal Government in developing an agency action that has the force and effect of law, the Federal awarding agency shall request, and the recipient shall provide, within a reasonable time, the research data so that they can be made

available to the public through the procedures established under the FOIA. If the Federal awarding agency obtains the research data solely in response to a FOIA request, the agency may charge the requester a reasonable fee equaling the full incremental cost of obtaining the research data. This fee should reflect costs incurred by the agency, the recipient, and applicable subrecipients. This fee is in addition to any fees the agency may assess under the FOIA (5 U.S.C. 552(a)(4)(A)).

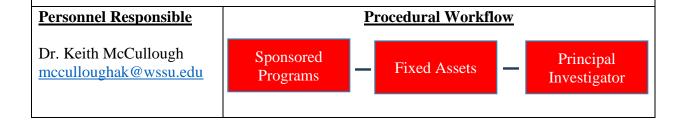
- 5. The following definitions apply for purposes of paragraph (d) of this section:
 - a. *Research data* is defined as the recorded factual material commonly accepted in the scientific community as necessary to validate research findings, but not any of the following: preliminary analyses, drafts of scientific papers, plans for future research, peer reviews, or communications with colleagues. This "recorded" material excludes physical objects (e.g., laboratory samples). Research data also do not include:
 - Trade secrets, commercial information, materials necessary to be held confidential by a researcher until they are published, or similar information which is protected under law; and
 - ii. Personnel and medical information and similar information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, such as information that could be used to identify a particular person in a research study.
 - b. Published is defined as either when:
 - i. Research findings are published in a peer-reviewed scientific or technical journal; or
 - ii. A Federal agency publicly and officially cites the research findings in support of an agency action that has the force and effect of law.
 - c. Used by the Federal Government in developing an agency action that has the force and effect of law is defined as when an agency publicly and officially cites the research findings in support of an agency action that has the force and effect of law.
 - d. Title to intangible property and debt instruments acquired under an award or subaward vests upon acquisition in the recipient. The recipient shall use that property for the originally authorized purpose, and the recipient shall not encumber the property without approval of the Federal awarding agency. When no longer needed for the originally authorized purpose, disposition of the intangible property shall occur in accordance with the provisions of paragraph ____.34(g).

<u>Property trust relationship</u> Real property, equipment, intangible property and debt instruments that are acquired or improved with Federal funds shall be held in trust by the recipient as trustee for the beneficiaries of the project or program under which the property was acquired or improved. Agencies may require recipients to record liens or other appropriate notices of record to indicate that personal or real property has been acquired or improved with federal funds and that use and disposition conditions apply to the property.

Assistance

The Office of Sponsored Programs (OSP), in collaboration with the Fixed Asset Office, will coordinate the management, reporting, and disposition of property acquired under sponsored program awards.

The PI/Project Director will receive formal notice from OSP regarding reporting (if applicable), and actions needed to complete the disposition process when appropriate. For further assistance, contact the Post-Award Administrator in the Office of Sponsored Programs.



C.Record Retention Guidelines		
Task	Record Retention, Disposition, and Security	WSSU Related Policy #:
		<u>700.2</u>
		UNC System Policy:
		Records Retention
		Federal Policy:
		21 CFR 312.57

Office Of Sponsored Programs Record Retention Guidelines

Record retention and access requirements are specified in OMB Uniform Guidance for Federal Awards and the North Carolina General Statute Chapters 121 and 132 as referenced in Winston-Salem State University's Record Retention, Disposition and Security Policy. All University departments and offices must conform to the applicable State and Federal laws regarding the retention, disposition, and security of University records.

All Winston-Salem State University departments and units involved in the administration of sponsored projects, particularly those that are federally funded, must ensure that records will be retained and be accessible in their respective areas in accordance with the retention requirements as determined in the grant.

Per OMB Uniform Guidance for Federal Awards, beginning with section 200.333 and incorporated by reference to each section thereafter, all records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

- 1. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- 2. When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- 3. Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- 4. When records are transferred to or maintained by the Federal awarding agency, the 3-year retention requirement is not applicable to the non-Federal entity.
- 5. Records for program income transactions after the period of performance. In some cases, recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- 6. Indirect cost rate proposals, cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting

computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).

- a. If submitted for negotiation. If the proposal plan or other computation is not required to be submitted to the Federal government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.
- b. If not submitted for negotiation. If the proposal plan, or other computation is not required to be submitted to the Federal government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.
- 200.334 Requests for transfer of records. (Refer to the OMB Uniform <u>Guidance for Federal Awards</u>)
- 200.335 Methods for collection, transmission, and storage of information. (Refer to the OMB Uniform Guidance for Federal Awards)
- 200.336 Access to records. (Refer to the OMB Uniform Guidance for Federal Awards)
- 200.337 Restrictions on public access to records. (Refer to the OMB Uniform <u>Guidance for Federal Awards)</u>

The University of North Carolina's <u>University General Records Retention and Disposition Schedule</u> adheres to the North Carolina General Statute Chapters <u>121</u> and <u>132</u>. Pursuant to GU26 (Grants, Awarded) and GU27 (Grants, Proposals) in the schedule, the schedule gives instructions to follow the grant requirements for record retention. GU26 states to follow records retention requirements for the grant then transfer final reports to University Archives three (3) years after completion and clearance from all audits, then destroy in office when reference value ends. GU27 states to transfer successful grant proposals to Grants Awarded then destroy in office rejected proposals when reference value ends.

To comply with these requirements, the Office of Sponsored Programs, and other units involved in the administration of awarded grants, will retain records in each office area for a minimum of six (6) years to include the three (3) years required for retention by instructions in most of the grant awards and three (3) years to satisfy the archival requirement in the North Carolina General Statue. Within the first month (July) of each fiscal year, the Office of Sponsored Programs will create a purging schedule of eligible records. Eligibility will be determined by the date of submission of the final financial report to the sponsoring agency. This schedule will be shared with the Office of Contracts and Grants and other applicable units involved in the administration of sponsored projects.

If there are no additional requirements such as litigation, the records will be destroyed within each office and a list of purged documents will be recorded. Each office is responsible for maintaining records of purged documents within its own area.

For non-funded proposal records as defined in GU27 (Grants, Proposals), the Office of Sponsored Programs will retain proposal documents twelve (12) months after submission of proposal and then destroy if not funded.

Task Budget, Expenditures, and Reconciliations WSSU Related Policy #: 500.2: 500.4 Federal Policy: 2 CFR 200 Subpart E

- 1. Contracts and Grants is responsible for account journaling and expenditure approvals; however, the PI and designated grant personnel are responsible for weekly monitoring of their actual vs. projected grant expenditures.
- 2. Weekly Webfocus reports of grant budgets should be reviewed for accuracy and used as monitoring of projected expenditures per the grant project. This can be done through excel and stored per the data management plan of the grant project. More thorough examinations of budget should be conducted through Banner Finance, see the cheat sheet for frequently used Banner Search Codes.
- 3. Grant purchases should be managed through the WSSU SU Express platform. It is the responsibility of the PI and designated grant personnel to review the <u>SU Express</u> guidelines even after their purchasing training.
- 4. Grant purchases made with Purchase Card (P-Card) must be preauthorized through Contracts and Grants and then reconciled in the monthly purchase card reconciliation process. It is the PI or designated personnel's responsibility to stay current with Purchasing Card Guidelines.

