External Grants Handbook

Siena College

Office of Government and Foundation Relations

Approved 12/2011

TABLE OF CONTENTS

I. Overview of Sponsored Programs

1. Preface 3
2. Definitions 4
3. Organizations Involved in Sponsored Programs 5

II. Proposal Development (Pre-Award)

1. Funding Sources 7
2. Development of a Conceptual Framework 7
3. Key Elements to a Grant Proposal 8
    a. Preliminary Inquiry
    b. Proposal Guidelines
    c. Cover Sheet
    d. Abstract
    e. Project Description (Narrative)
    f. Bibliography
    g. Supplementary Documentation

4. Budgetary Development 11
    a. Direct Cost 11
        i. Salaries and Wages
        ii. Fringe Benefits
        iii. Consultants
        iv. Equipment
        v. Travel Expenses
        vi. Supplies
        vii. Other Direct Costs

    b. Indirect Costs 14
        i. Facilities and Administration
        ii. Cost Sharing/Matching Funds
        iii. Supporting Budget Information

5. Proposal Submission Approval 14
    a. Grant Proposal Submission
    b. Required Proposal Copies
    c. Electronic Submission of Proposals

III. College Policies Related to Grants and Agreements (Post-Award)

1. General College Policy Overview 16
2. Contractual Liability for Sponsored Programs 16
3. Project Costs 16
4. College Resources and Policies 17
    a. Research Integrity (in development)
    b. Conflict of Interest
    c. Financial Conflict of Interest Disclosure
    d. Cost Sharing

e. Gifts in Support of Research
f. Indirect Cost Recovery Policy

5. Post Award Administration 20
   a. Award Receipt
      i. Proof of Award
      ii. Contract Negotiation
      iii. Execution of Contracts and Agreements

6. Establishing a Sponsor Funds Account 21
7. Indirect Cost Recovered Allocation 21
   a. Fiscal Year Distribution
8. Budget Revisions and Transfers 22
   a. Budget Transfer
   b. PI Transfer to Another Institution
9. Equipment vs. Non-Equipment 23
10. Budget and Expenditure Monitoring 23
11. Cost Transfers and Expenditure Reclassifications 24
   a. Error Corrections
   b. Expenditure Approval

12. Independent Contracts 25
13. Subaward 25
   a. Issuance of a Subaward
   b. Revision to a New Subaward
   c. Subaward Period of Performance and Duration
   d. Modification and Amendments to Existing Subaward Agreements
   e. Closeout of Subawards
      i. Final Technical Reports
      ii. Other Closeout Reports and Documents
      iii. Final Invoicing

14. ARRA Funded Projects 28
15. Reporting Requirements 29
16. Effort Certification 29
17. Cost Sharing Policy 30
18. Faculty Compensation on Sponsored Projects 30

APPENDICES 32

Exhibit A: Indirect Cost Recovery/Overhead Distribution Policy

Exhibit B: Cost Sharing Policy

Exhibit C: Policy on Charging Compensation to Sponsored Projects for Faculty

Exhibit D: Conflict of Interest Policy and Conflict of Interest Disclosure Form

PREFACE

The mission of the Office of Government and Foundation Relations (OGFR) is to coordinate and facilitate all aspects of public and private sponsored activities and maintain continuous interaction with federal, state and local government entities in advancing the governmental agenda of the College. To this end, the Office will:

1. Provide pre- and post-award grant services to faculty submitting grant applications to external funding agencies in an effort to strengthen and augment scholarly and research efforts across all academic disciplines;
2. Work closely with the President and senior administration to generate state and federal revenues for the College;
3. Provide assistance to administration and faculty in working through the legislative process;
4. Participate in higher education policy discussions at the federal, state, and local levels; and
5. Cultivate, strengthen and coordinate all foundation relations matters in advancing the academic priorities of the College.

Since the inception of the grants office in March 2001, Siena College has experienced an exponential growth in the area of sponsored projects. The increased external funding of faculty activities is a reflection of the College's dynamic growth as a premier liberal arts college that values undergraduate research. The primary purpose of this *External Grants Handbook* is two-fold. First, it is designed to introduce faculty and administrators to the process of obtaining funding for and administering sponsored projects. Second, it also serves as an introductory guide to the policies and procedures that govern interactions with external funding organizations. In this handbook you will find a range of sponsored project topics ranging from general guidance on pre-award services; i.e., proposal development, budgeting, grant submission; to Federal regulations and institutional policies and procedures associated with post-award administration (i.e., subrecipient monitoring, budget allocations, effort certification).

The *External Grants Handbook* is a collaborative effort, and the contributions of Beth Kiernan (Assistant Comptroller and Director of Financial Compliance), Mary “MJ” Strunk (AVP Finance and Administration), Sharon Finnerty (Director of Grants and Sponsored Programs) and Sandra Casey (College Counsel) are gratefully acknowledged. We also want to thank members of the National Council of University Research Administrators (NCURA) community who provided much needed guidance and shared resources to help strengthen sponsored project management and oversight at Siena College.

It is our intent to update the *External Grants Handbook* as necessary. We would appreciate any comments or suggestions you would care to make in order to make the *Handbook* as useful as possible. For grant-related information not covered in the Handbook, please contact Alfredo Medina at (518) 783-2307 or amedina@siena.edu, or Sharon Finnerty at (518) 782-6829 or sfinnerty@siena.edu.

Regards,

Alfredo Medina, Jr.
Assistant Vice President for Academic Affairs
Office of Government and Foundation Relations

Definitions

Sponsor

A sponsor is an external organization that provides financial support for a defined project with well-defined funding expectations. Sponsors may include the Federal government, state and local governments, foundations, international organizations, research institutes, and corporations. These organizations fund sponsored projects through a variety of mechanisms such as contracts, grants, letter agreements, purchase orders, cooperative agreements, and a variety of awards that fall under the general rubric of subcontracts.

Sponsored Projects

For the purposes of this Handbook, sponsored projects[1] are defined as "research, training, or instructional projects involving funds, materials, other forms of compensation, or exchanges of in-kind efforts from sources external to the College under awards or agreements which contain any one of the following criteria:

- The award or agreement binds the College to a scope of work that is specified to a substantial level of detail.
- A line item budget is involved. A line item budget details expenses by activity, function, or project period. The designation of indirect or administrative costs qualifies a budget as "line item."
- Financial reports are required and/or the expenses are subject to audit.
- The sponsor defines a period of performance during which funds may be used and/or unused funds must be returned to the sponsor.
- The award or agreement provides for the disposition of either tangible or intangible properties which may result from the project. Tangible properties include equipment, records, formal activity reports, theses or dissertations. Intangible properties include rights in data, copyrights, or inventions or research related materials."

This definition is derived Boston College's Office of Sponsored Projects to capture the types of projects that a typical sponsored project office supports. Solicitation of major gifts or unrestricted funds in the form of a pledge or donation should be directed to the Office of Development and External Affairs.

Principal Investigator / Project Director

The Principal Investigator (PI) or Project Director (PD) is the identified lead personnel on a grant. S/he holds a number of responsibilities related to sponsored projects, the core of which is conducting the work for which external funding has been received. The PI/PD also has administrative responsibilities such as assuring that expenditures are made for the intended purpose of the project and in accordance with sponsor requirements and College policy and procedures. Other PI/PD responsibilities include writing proposals for funding and complying with the technical requirements of awards. The latter involves submitting periodic and final narrative reports on the progress of the project and overseeing others who

[1] Definition is quoted from the Boston College Principal Investigator's Handbook given the similarities in sponsored programs managed at Siena College.

may contribute to the project, including College employees, consultants, and subcontractors, on a timely basis. The PI must ensure they are in compliance with the College time and effort reporting system. Since, in a legal sense, sponsored projects are actually agreements between a sponsor and Siena College and in order for Siena College to fulfill its responsibilities under sponsored agreements, it is necessary for the PI/PD to have an appropriate faculty appointment (for academic-related funding). The following guidelines were established by VPAA and the Deans regarding the qualifications for PI or PD:

A. Regular term faculty of the following ranks: Professor, Associate Professor, Assistant Professor.
B. Visiting faculty as approved by the Department Chair, Dean, and VPAA.
C. For all non-faculty appointments (administrator), approval must be sought from your immediate supervisor and respective Vice President.

Questions concerning these guidelines may be addressed to the Assistant Vice President for Academic Affairs, Government and Foundation Relations. The Vice President for Academic Affairs has assigned OGFR the responsibility for ensuring compliance with these guidelines.

Organizations Involved in Sponsored Programs

Sponsored program administration at Siena College provides an integrated team of professionals serving the needs of the faculty pursuing externally funded projects, research support and scholarship excellence. The team provides the support, both administrative and financial, for pre- and post-award processes involved in promoting and managing external funding from federal, state, local and private sources. The Vice President for Academic Affairs oversees academic sponsored programs (grants and contracts) through the Office of Government and Foundation Relations.

1. Office of Government and Foundation Relations

The Office of Government and Foundation Relations (OGFR) is responsible for pre-award, post-award (non-financial) and compliance activities related to internal and external grants, contracts and other sponsored program pursuits. Services include, but are not limited to, searchable online funding databases, grant writing seminars and workshops, proposal development assistance, administering research compliance, and travel support to national funding agencies. Additionally, the office acts as Siena's representative in pursuing partnerships and collaborative agreements with entities outside the institution.

OGFR is the central point of coordination for sponsored projects, representing the VPAA's authority over academic activity College-wide. The Assistant Vice President for Academic Affairs – Government and Foundation Relations (hereafter referred to as AVPAA) and the Director of Grants and Sponsored Programs (hereafter referred to as DGSP) serve as the College's representatives and authorized institutional officials for grants, contracts and other agreements from government agencies and private industry. The office also assists faculty and staff with proposal preparation (agency forms and budget preparation), proposal submission, and monitoring in coordination with Assistant Comptroller and Director of Financial Compliance, negotiating research-related agreements, and other post-award activities such as time extensions and budget modifications. Finance management, reporting and compliance are chiefly located in the Office of Financial and Administration under the Assistant Vice President of Finance and Administration and Comptroller (hereafter referred to as Comptroller).

2. Academic Leadership

In concert with the Office of the Vice President for Academic Affairs, the three Deans work jointly with OGFR to disseminate funding announcements and identify potential faculty in their respective School to lead a sponsored grant project. In addition, department chairs may become involved during the pre-award phase of a grant. Department chairs and deans should be consulted for the following functions: approval of reassigned time, departmental expenses, matching and/or in-kind commitments and other grant-related functions that required department chair approval (i.e., material purchases). Prior to the submission of a proposal, faculty should consult with their respective dean and department chair about their interest in pursuing sponsored funds for a research and/or development project.

3. Institutional Review Board (IRB)

College and Federal policies require that sponsored research projects involving human subjects must undergo human subjects review by an established Institutional Review Board (IRB). Therefore, all research involving human subjects conducted under the auspices of Siena College must attain IRB approval before the initiation of any data collection. The IRB is comprised of faculty and administrators from various departments and disciplines that evaluate and approve protocols by faculty who intend to use human subjects in their research. The AVPAA serves as the institution's human subject's compliance officer. In cooperation with the IRB Chair, both are responsible for oversight of federal and institutional policies related to human subject's research protection and approval of IRB applications.

4. Office of Development and External Affairs

The Office of Development and External Affairs (DEA) researches, cultivates and approaches friends, corporations and philanthropic foundations to be donors or sponsors of Siena endeavors supported by the mission of the college. The Offices for Government and Foundation Relations and Development External Affairs have clearly defined responsibilities for soliciting and securing external support for the institution. However, there are times when both offices work collectively to support institutional initiatives towards heightening the academic reputation of Siena College. OGFR coordinates with Development and External Affairs in several ways: (1) as the clearinghouse for Siena faculty and staff seeking external funding from corporations and private foundations; (2) as expert advisors on unsolicited approaches (letters, visits) to entities referenced above; (3) as the lead institutional office when sponsor has a pre-existing relationship with DEA or when the sponsor's funding is likely to be more of a gift than a grant.

5. Office of Finance and Administration

The Comptroller's Office, primarily through the Office of Finance & Administration, and Assistant Comptroller and Director of Financial Compliance are responsible for post-award administration on financial matters, reviewing and analyzing expenditures, expenditure reporting to sponsors and external agency, cash management and preparation of the facilities and administrative (F&A) cost-rate proposal as well as preparing the College's Annual Expenditures of Federal Awards audit report in accordance with OMB Circular A-133.. The Principal Investigator (PI) or Project Director (PD) and AVPAA work directly with the Assistant Comptroller and Director of Financial Compliance to ensure financial compliance and appropriate allocation and spending of approved sponsored funds.

II. Proposal Development (Pre-Award)

1. Funding Sources

Faculty and administrators interested in seeking external support for individual or group projects are encouraged to contact OGFR as early as possible. Due to the competitive nature of applying for external funding, it is advisable to start your funding search early. For those interested in learning about opportunities in a specific field, OGFR subscribes to a comprehensive database of various funding sources that spans across all areas.

The AVPAA and DGSP are available to address topic-specific inquiries of funding opportunities in a particular area. It would be beneficial to interested faculty and administrators to discuss their proposed concept with them prior to a search to determine the most suitable funding match available. Any interested individual or group should schedule a meeting to discuss the concept and make sure that it fits within the mission of the department and Siena College.

In addition, OGFR subscribes to SPIN via InfoEd International, one of the leaders in research and development information and services in the world. SPIN provides up-to-date listings of national and international government as well as private funding sources. To access SPIN, please visit the OGFR website Grant Resources and Tutorials page at http://www.siena.edu/pages/734.asp.

OGFR encourages faculty and administrators to visit the SPIN database to become familiar with these modules. This is a wonderful way to be kept apprised of what types of sources are available in your respective field and build on relations with faculty from within Siena and across other college campuses.

2. Development of a Conceptual Framework

Once a funding opportunity has been identified, the next step is to initiate the conceptualization process, which will require occasional meetings between the PI/PD and internal/external collaborators, and at times the AVPAA or DGSP to begin formulating a concept that meets the guidelines and requirements described in the Request for Proposals (RFP). As part of this process, the PI/PD needs to complete and return OGFR's Notice of Intent to Submit a Grant Proposal form at least three weeks prior to the proposal deadline. Available on OGFR's Forms and Templates page, the purpose of this form is to ensure that all required approvals are in place before the deadline.
Developing the conceptual framework is by far the most critical stage in the proposal development process because it requires convening regular meetings between collaborators to ensure that the developed concept is technically sound and meets the mission of the funding agency. However, before the PI/PD begins to develop the conceptual framework, there are several questions to ponder:

- Who will serve as the Principal Investigator (PI) or Project Director (PD) on the project?
- Who are the most appropriate individuals and/or institutions to invite as potential collaborators?
- Does the funding opportunity require any cost sharing or matching?
- If there are outside collaborators, will Siena College serve as the lead institution or as a subawardee/subcontractor?

- If funded, can the proposed PI/PD commit an adequate amount of time to coordinate and oversee the project?
- Has the PI/PD consulted with their department chair and dean to discuss reassigned time (course buyout) approval, if warranted?
- Is reassigned time a requirement of the funding agency? If so, will this requirement impede the faculty's teaching load?
- Does the funding agency require membership to the organization prior to proposal submission?

These are just some of the many questions that should be addressed before proceeding with writing a proposal. There are instances in which a particular question/issue is overlooked, thus leading to the dismissal of a proposal. If faculty/administrators have any questions regarding a program announcement, please contact OGFR as early as possible. Providing a copy of the RFP is recommended when addressing RFP inquiries.

OGFR recommends that after all pertinent questions have been addressed, the PI/PD should convene a meeting between internal and external collaborators (if applicable) to begin framing and shaping the proposal. It is also highly recommended that the AVPAA or DGSP be invited to the initial planning meeting to become familiar with the key personnel involved and the proposed concept in an effort to provide adequate technical assistance.

3. Key Elements to a Proposal

After determining which funding source best matches the proposed concept, the PI/PD may refer to this handbook for guidance on constructing a winning proposal. It is also advisable to contact the program officer directly to be sure that the proposed concept falls within funding agency's interest. In doing so, the program officer can address any question not covered in the RFP. The OGFR will serve as a liaison between the PI/PD and the program officer in situations when s/he is unable to make the initial contact.

a. Preliminary Inquiry

In some cases, a sponsor will require a Letter of Intent/Inquiry (LOI) from the applicant prior to the submission of a full proposal. There are several reasons as to why they request an LOI:

- To determine if the proposed concept fits within the sponsor’s scope of interest.
- To inquire information about the applicant, particularly if the applicant has never applied for funding.
- To measure degree of novelty and creativity in the proposed concept.
- To determine if the proposed concept is feasible and capable of accomplishing its goals.

The format of an LOI varies from sponsor to sponsor. Please read the funding agency's guidelines carefully with regards to word count, font size, spacing, and page limitation. Below are items that an applicant may encounter when developing an LOI:

- Organizational mission statement and purpose

- The nature and extent of the problem (need statement)
- How the proposed effort relates to the sponsor's goals
- Target population and level of involvement
- Program objectives and evaluation
- Goals and objectives
- Evaluation criteria and methods for program objectives
- Data collection procedures
- Timeline of proposed activities
- Names and qualifications of personnel responsible for coordinating project
- Estimated cost for the project, the amount to be assumed by the grant recipient, other organizations, and the amount requested from the sponsor
- Name, address, phone number, and email of the PI and primary contact person responsible for addressing technical questions pertaining to the proposal

If anyone is in need of assistance in preparing a letter of inquiry/intent or would like to have it reviewed prior to submission, please contact the AVPAA. It is not required that an LOI receive institutional approval for submission.

b. Proposal Guidelines

There are various formats that can be used to develop a proposal. As indicated earlier, before taking the liberty to create your own format for the proposal, please refer to the RFP for specific instructions on formatting issues such as word count, font size, page limitations, and the number of copies to submit. Sponsors reserve the right to dismiss and/or return proposals that deviate from the guidelines specified in a grant announcement. Please pay careful attention to the formatting requirements when preparing the proposal.

While the format of a proposal may differ from one agency to another, components of a proposal remain generally the same unless you are applying to agencies such as the NSF, NIH and NASA. The main components of a typical proposal are as follows:

c. Cover Sheet

For the most part, sponsors require applicants to complete a cover sheet. The cover sheet is used by a sponsor to document background information on the applicant. Most of the information that is requested by the sponsor may include:

- Name and address of institution
- Type of institution (i.e., nonprofit, higher education)
- Principal investigator and OGFR contact person
- Project title, duration, and total budget request
- Human subjects research approval (if applicable)
- Name, title, address, telephone number, email address, and signature of OGFR Director, President, and Chief Financial Officer.

These are just a sample of the items one should be prepared to answer on a standard cover sheet. As for Federal sponsors, the cover sheet usually will request additional pertinent information such as Employer Identification Number (EIN), Congressional District, DHHS Human Subjects Assurance Number and Indirect Cost Agreement Date to name a few. Please visit the OGFR Fact Sheet at www.siena.edu/pages/732.asp.

d. Abstract

With the exception of the National Science Foundation (NSF) and some other federal sponsors, the majority of public and private funding agencies require an abstract to precede the project narrative. An abstract is a "one-page description of the major objectives of the proposed research and the strategy used to meet those objectives." An abstract should state the significance of the project, how the goals will be accomplished, and the time span of the project. It is also recommended to include a statement on the proposed outcomes. As for NSF, a project summary is usually requested in lieu of an abstract. A project summary, as defined by NSF, is a self-contained description of the activity that would result if the proposal were funded. It also requires the PI to address both the intellectual merit and broadening of participation.

The purpose of an abstract is to assist the sponsor in identifying appropriate peer reviewers and assigning proposals for them to review. Usually when a project is successfully funded, the abstract is entered into a regional or national database that can be accessed electronically by the public.

e. Project Description (Narrative)

This section is best known as the main body of a proposal. The project narrative, as some sponsors refer to it, is a clear statement of the proposed concept which may include: scope of work; research design, goals and objectives (expressed differently for science proposals); expected outcomes; management plan; key personnel identified; and evaluation plan. Faculty seeking support for basic and/or applied research should provide an adequate description of the research design, methodology, and procedures for collecting and analyzing data. The description should also delineate how the proposed objectives will be achieved, how the project will be evaluated, and how the results will be disseminated.

It is critical that the PI establish a theoretical framework when writing the project description. OGFR recommends that a plan of action be established to give reviewers a sense of what the PI or group intends to do. In addition, avoid the overuse or misuse of research jargon when applying to private foundations that are not of a scientific nature. Faculty should use their judgment when using research terminology, but keep in mind that a proposal may be dismissed due to vagueness in the research questions posed.
When collaboration is involved, the PI/PD should be clear regarding the role of each partner institution. In many cases, any substantial partnership with individuals needs to be supported by a letter of cooperation and/or intention from each collaborator. Please refer to Supplementary Documentation for more information. In any event, the project narrative should describe the expertise of the partner, what service or product the collaborator has proposed, and how does the service or product "fit" within the proposal. The PI/PD should be careful when working with other institutions since peer reviewers are keen on investigating the relevancy of the collaborator's contribution to the project. Even though a

collaborator is able to meet its cost-sharing obligation doesn't necessarily mean that the PIs on the grant possess the expertise to carry-out the work that is being proposed.

Many Federal sponsors are beginning to require that research be linked to educational activities and teaching. In addition, the majority of public and private sponsors are interested in funding institutions that broaden the participation of undergraduate students and underrepresented groups in research. If you encounter difficulties with developing a plan of action to recruit or attract underrepresented groups, please consult the AVPAA for guidance on integrating diversity and broadening participation across underrepresented groups.

f. Bibliography

Although this may appear self-explanatory and tied to Academic Honesty policies, PI/PD is required to cite their work in an approved bibliography format approved by the sponsor. For each reference, the PI/PD needs to include the names of all authors; the title of the article, book or journal; volume number; page number(s); year of publication; and website address (if available). Where applicable, the PI/PD should follow scholarly practices when providing citations. Most references are cited using the American Psychological Association (APA) or Modern Language Association (MLA) format.

g. Supplementary Documentation

All other pertinent information relevant to the proposal should be included in this section. Supplementary documentation, or an appendix, usually comes at the end of the project description and should only include supportive information requested by the funding sponsor. Examples of supplementary items include graphs, management charts, letters of support and/or cooperation, tables, surveys, resumes, curriculum vitas, and biographical sketches. With regards to collaborative projects, a letter of cooperation from all the partners documenting their support and responsibilities should be included. For technical assistance on developing a letter of cooperation/support, please contact OGFR.

4. Budgetary Development Information

All proposals require a detailed budget of all costs associated with the successful completion of a R&D project. The PI should forecast budget expenses for each year and a cumulative budget for the full term of the project. This section should also consist of a complete budget justification for all services and goods included in the project budget. Below are some of the general items on a budget form:

a. Direct Costs

(i) <u>Salaries and Wages</u>

It is suggested that any individual who will contribute a significant portion of his/her time and effort to a grant project be included in the budget. However, not all individuals involved in a project need to be included in the budget, particularly faculty that will contribute their time and effort in an advisory capacity. Please consult with OGFR Director for competitive wage rates for administrative/staff positions. Also, when

figuring out salary/wages, consider the following: summer salary, reassigned time (course-buyout), and sabbatical/scholarly leave. Time/effort should be expressed in percentage format. For faculty, salaries are typically based on a nine-month academic year. For NSF grants, no more than two-ninths (2/9) of salary can be requested for faculty conducting research during the summer.

A faculty member seeking external grants should request salary support based on their nine-month academic year contract. Each month of grant effort represents 1/9 of the salary base. The level of salaried effort frequently varies from 5% to 100%, depending on the nature of the applicant's grant activities.

(ii) Fringe Benefits

Fringe benefits refer to the following items: health insurance, retirement benefits, and FICA expense. To calculate fringe benefits, multiply fringe rate (should be expressed in decimals, not percentage) by total salaries and wages expenses. For update to date rates, visit the Fact Sheet online.

(iii) Consultants

A consultant is an individual or organization not affiliated with Siena College that will provide a temporary service or product which will contribute to the overall success of the project. Consultants should only be sought when the College does not have the expertise or capability to carry out a specific task/activity. A consultant is not considered an employee of Siena College and will not be entitled to receive any fringe benefits. Contact OGFR for approved contractual rates for consultants. The IRS definition of a consultant may be different from a granting agency definition. Siena College uses IRS definitions to determine whether an individual is a consultant or an employee. Therefore, when engaging the services of an individual the PI should consult with the Assistant Comptroller to determine the appropriate classification of the individual prior to grant submission.

(iv) Equipment

Equipment is an item essential to a project that has an acquisition cost of $5,000 or more and has a projected service life of more than one (1) year. Some sponsors have different definitions for equipment. NSF only allows budgeting for equipment that has an acquisition cost of $5,000 or more. Please be careful when requesting funds for the purchase of computer systems. Computers may fall under the "supplies" heading in some instances. When developing a budget, consult with the OGFR for clarification.

(v) Travel Expenses

A travel expense is defined as any cost which requires travel to a domestic or foreign destination that directly relates to the project. Allowable expenses include request for

attending meetings and conferences, field work, and mileage reimbursement for attendance to local and regional meetings.

Per Diem Rate: This is an allowance (also referred to as subsistence allowance) for lodging (excluding taxes), meals, and related incidental expenses. For standard domestic and foreign per diem rates, visit the U.S. General Services Administration Per Diem Rates or GovExec.com website. The per diem rate may be used for grant purposes. However, when submitting travel expenses the PI is expected to follow the College's Travel and Entertainment Policy which requires appropriate documentation for all expenses. Please note air travel requires the use of domestic carriers. See the Travel and Entertainment Policy for complete details.

(vi) Supplies

Supplies are defined as any expendable equipment under $1,000 and consumable materials essential to the project. Examples of supplies include computer software, books, and paper. An itemized breakdown of all supplies must be included in the budget justification.

(vii) Other Direct Costs

Any expenses not applicable to the previous headings are otherwise referred to as "other direct costs" or "miscellaneous". Examples of budget items under this category include, but are not limited to: publication costs, equipment service and maintenance, space and facilities rentals, stipends, human subject fees, postage, reproductions, and telephone and internet services. However, depending on the funding source, not all these items are considered allowable expenses. Please refer to the RFP budget guidelines for clarification. Below are some general categories.

Subawards

Any collaborative project that requires the delivery of services or product from an external organization must enter into a formal agreement with the lead institution as a subcontractor. At the very least, the subcontractor must provide a clear description of services to be rendered and a separate detailed budget for each subaward. The budget must be approved by the Office of Finance and Administration and then handed over to the Authorized Organizational Representative of the institution receiving the subaward for approval. Approval will only be accepted in the form of a signature.

Publication Costs

Some sponsors allow the PI to request funds for cost associated with publication and dissemination. For example, NSF allows request for documenting, preparing, and publishing findings and products conducted under the grant. For specific information on publication costs, please refer to the RFP guidelines. OGFR recommends that applicants contact the sponsor for inquiries related to publication costs.

b. Indirect Costs

(i) Facilities and Administration

Indirect cost, also referred to as "overhead", are budgeted expenses generally used for facilities maintenance and management of sponsor funds. At Siena College, these costs are established by calculating a percentage of the salaries and wages. Please refer to the OGFR Fact Sheet for Siena's current indirect rate regarding projects on- and off-campus research and training grants. Some sponsors disallow or establish their own allowable indirect cost rate that the College must comply with in order to be eligible to receive external funds.

(ii) Cost Sharing/Matching Funds

As competition for funding heightens and the level of funding decreases, some sponsors require that the applicant contribute a certain portion of funds to the cost of the project as a way to express commitment and leverage resources. Most contributions are requested as cash or in-kind. If a project requires cost-sharing, the PI is required to consult with their respective Dean, Vice President for Academic Affairs and the Vice President for Finance and Administration. The PI is required to receive written approval prior to submitting a proposal. This is to ensure that Siena College is capable of matching the sponsor's cost-share requirement.

(iii) Supporting Budget Information

Current and Pending Support

Most federal sponsors require that the PI, co-PI, and any senior personnel provide information on active and pending grant support. The kind of information requested includes project title and number, sponsor name, project duration, percentage of effort, and budget amount. Faculty and staff are also encouraged to include information on pending support. Sponsors use this information to determine personnel expertise, relevant funding sources, and level of commitment on other projects.

5. Proposal Submission Approval

The PI/PD must complete and return the Notice of Intent to Submit a Grant Proposal form at least three weeks prior to the proposal deadline. OGFR will review the information provided and assist with obtaining any required approvals as necessary. Before the proposal is submitted, the PI/PD must also complete the Required Approvals form and Conflict of Interest Disclosure form. All forms are available on OGFR's Forms and Templates page.

A complete copy of the proposal, including budgetary information, in its entirety must be delivered to OGFR a minimum of five (5) working days prior to the submission date. If a proposal must be received by the sponsor on a particular date via first-class mail, OGFR recommends that the PI/PD factor in the additional days it would take for the proposal to reach its destination. OGFR will review the proposal to

ensure that it complies with all standard Federal regulations (if applicable) and College policy and procedures. It is the responsibility of the PI/PD to ensure that the proposal meets the formatting requirements specified in the program announcement.

In order to provide the best service and technical assistance possible, it is suggested that OGFR is contacted about grant development plans at least three (3) months prior to a proposal submission due date. There are several reasons for receiving notice 90 days prior. Some examples may include:

- Create an official working folder is established for the proposed grant
- Meeting between PI and respective Chair, Dean and VPAA to review grant implications (i.e., cost-share, conflicts of interest, spacing)
- Create a budget and review of request and justification to ensure all budgetary request are allowable and comply with institutional policies (i.e., hiring of personnel, wages, course release)

a. Grant Proposal Submission

All requests for external funding, regardless of source, must be processed through the proper channels of Siena College before initiation of effort on the project. Therefore, all external public and private grant applications must be reviewed and submitted by OGFR. If an external grant requires financial cost sharing and/or institutional commitment that will impact a particular department, School and/or administrative unit of the College, then the grant application will require additional approval from the respective Dean, VPAA and VPFA prior to submission. Please refer to "College Resources" section for further information. Individual grants to a faculty member (i.e., Fulbright Award, ACLS or NEH Fellowship) that is tax deductible does not require OGFR approval for submission unless the faculty member chooses to have the college manage the funds on his/her behalf after grant has been awarded.

b. Required Proposal Copies

The PI/PD is encouraged to provide OGFR with a complete copy of the proposal for record keeping purposes. This is also a safe way to keep an additional proposal on file in the event the PI/PD misplaces their copy and has intentions to resubmit the proposal in the near future. With regards to sponsor requirements, please refer to the RFP for specific information on the number of copies that need to be included in the submission packet. If the information is not stated in the guidelines, OGFR will contact the appropriate program officer and provide the PI/PD with the information.

c. Electronic Submission of Proposals

Most Federal sponsors require that proposals be submitted electronically. However, in order to streamline the process, OGFR advises that the PI/PD provide OGFR with online access to all pertinent proposal documents for review prior to submission. OGFR is also available to assist the PI/PD with converting documents into PDF formatting and uploading documents onto the various electronic submission systems available (i.e., Grants.gov, NSF Fastlane, E-Grants).

III. College Policies Related to Grants and Agreements

Siena's sponsored program administration team supports curricular, research and scholarship pursuits by facilitating the numerous policies and procedures required to ensure compliance and institutional support of sponsored programs.

1. General College Policy Overview

External funding is an integral part of today's academic environment. Siena encourages faculty members to seek external funding for programs and scholarship that supports Siena College's mission and vision. The ultimate responsibility for managing these projects belongs to the Principal Investigator (PI) or Project Director (PD), assisted by Siena sponsored programs administration and your departmental chair and staff, if applicable. All applications, proposals, and contracts for research funding, training, and other research-related activities, are made in the name of Siena College. Siena is required to comply with applicable U.S. Office of Management and Budget circulars A-110, A-21, and A-133, as amended and other regulations, guidelines and instructions in the notice of grant award or award letter when receiving federal funds. In the use of non-federal funds, the College must comply with the award agreement and the policies and procedures hereby described in this Handbook. All projects regardless of the source of funds must comply with all College policies.

2. Contractual Liability for Sponsored Programs and Research

If an application, proposal, and/or contract is not processed through the proper channels of Siena College's Office of Government and Foundation Relations and is subsequently funded, there is the risk of the award not being accepted, or a delay in accessing funds. Additionally, if a project is solicited by a third-party organization, and work is performed on this project in absence of a recognized and fully-executed sponsored program (grant or contract), the Principal Investigator/Project Director alone maintains ultimate liability for any and all requirements of the sponsored funded program. Further, the PI/PD must reimburse the College for any and all costs associated with the use of College resources commonly associated with the pursuit of this sponsored funded project.

3. Project Costs

Siena College expects the sponsor of the project to pay the actual costs for conducting the activity. These costs include both the direct costs and facilities and administrative (F&A or indirect) costs incurred by the PI/PD during the conduct of a project. The treatment of direct and F&A costs by Siena must be in compliance with OMB Circular A-21. Direct costs can be clearly identified and directly benefit a specific project -- salaries, consultant cost, equipment, laboratory supplies, travel, other expenses, and consortium/contractual costs. F&A costs (also referred to as indirect or overhead costs) are generally those institutional infrastructure costs that cannot be easily attributed to an individual project or monitored on an individual basis, and include building and equipment use, operations, maintenance, utilities, general departmental administration, telecommunications, library resources, and capital improvements. Each grant is expected to pay its proportional share of these infrastructure costs, if allowable. The facilities and administrative cost rate is negotiated between Siena College and the U.S. Department of Health and Human Services. All project budgets should include facilities and administrative costs (as applicable to

the sponsor) as determined by this federally negotiated facilities and administrative cost rate. Exceptions to this policy may be considered on a case-by-case basis if the sponsor has an established, written policy applicable to any and all potential applicants that deviates from the federally negotiated rates. All deviations are subject to approval by the Vice President for Finance and Administration prior to submission of the grant or execution of the contract.

4. College Resources and Policies

Siena College encourages its faculty to interact with business, industry, public and private foundations, government agencies, and religious and other educational institutions in appropriate ways. Such interaction assures the relevance of the College's missions of teaching, research and service. Siena employees may not use College resources (including any person, money, or property) under their official control or direction or in their custody, for personal benefit or gain, or for the benefit or gain of any other individuals or external organizations.

Per Siena's Conflict of Interest Policy, it is permissible for a reasonable amount of College resources to be used in support of approved consulting activities while monitoring the usage of resources and reimbursing the College from fees or royalties earned from these activities. However, the use of research resources, including laboratories and research equipment should not be used for consultancy activities. In such cases where research equipment is needed, the sponsor should enter into a sponsored research agreement with Siena College to ensure that the College is reimbursed for expenses incurred to provide and maintain these facilities. In cases where College resources are utilized in the absence of a sponsored program agreement, the faculty member will assume all responsibility for reimbursing the College for rental fees and/or royalties earned from these activities.

a. Research Integrity

Siena College employees are expected to adhere to the highest ethical standards for all research and scholarly work. It is the responsibility of every principal investigator/project director to maintain the integrity of research projects by keeping accurate, permanent, and auditable records of all experimental protocols, data, and findings, and to charge other contributors with the same standards. Misconduct in research and other unscholarly activities is incompatible with the standards of Siena College and all allegations of such behavior will be handled promptly. Additional information including a Siena College Policy on Misconduct in Research is under development.

b. Conflict of Interest

Siena College employees should conduct their affairs so as to avoid or minimize real or apparent conflicts of interest, including financial conflicts of interest and conflicts of commitment. Siena's Conflict of Interest Policy, available on OGFR's Forms and Templates page, describes the College's regulations for conflict of interest and commitments. This Policy is intended to serve as a primer for faculty members and other proposed project directors and co-directors in structuring their relationships with business entities in view of their primary academic responsibilities to Siena. The Policy is not intended to eliminate all situations of conflict of interest, but rather to enable faculty to identify and avoid real or apparent conflicts of interest.

In addition to Siena's regulations, federal agencies have additional conflict of interest regulations that are applicable to sponsored programs. These regulations require universities applying for grants to ensure that there is no reasonable expectation the design, conduct, and reporting of research will be biased by any significant financial interest of an investigator responsible for the design, conduct, or reporting of that research. Any real or apparent conflict of interest should be reported to the Office of the Vice President for Academic Affairs. If potential conflicts of interest involve sponsored program activities, these conflicts should also be reported to the VPAA, AVP in the Office of Government and Foundation Relations and College Counsel so that a proper disclosure and review can be performed before any sponsored program is initiated. In most cases, a conflict of interest may be managed or avoided through proper guidance in structuring an appropriate relationship and through thorough review, disclosure, and monitoring processes.

c. Conflict of Interest Disclosure Form

Before a grant application can be sent to a sponsoring agency, OGFR must have a conflict of interest disclosure statement on file for all key personnel listed in the application. All research applications require certification that the investigators conducting the research do not have a conflict of interest that might compromise the conduct of the proposed research or the interpretation of the results of the research. The form is also available on the available on OGFR's Forms and Templates page.

Please refer to Exhibit D for more information on the *Conflict of Interest Policy* and *Conflict of Interest Disclosure Form*.

d. Cost Sharing

Occasionally, sponsors may require that Siena College share part of the costs of the proposed project. While Siena College does not discourage voluntary cost sharing, the PI/PD must consult with the OGFR before applying for the grant. Ultimately, the VPAA and respective Dean must review any cost-share/matching request and any such costs must be approved in advance by the VPFA before applying for funding. Siena will only provide cost sharing in cases where the sponsor's written guidelines state that cost sharing is required of all applicants. In such cases, in-kind faculty salary time and unrecovered F&A costs working on the project may be applied toward the cost sharing requirement with prior review and approval. Cost sharing should only be included in a proposal as the College's contribution toward a project only when required to do so by the sponsor.

To qualify for cost sharing, matching funds, or in-kind contributions, all charges must be:

- Allowable under sponsor policies and the terms of the grant award guidelines;
- Allowable as a cost to the project;
- Reasonable and necessary for performance of the project; and
- Allowable on the source proposed to fund the cost sharing commitment.

e. Gifts in Support of Research

Siena College is pleased to accept gifts of funds to support R&D and scholarship activities. Monetary gifts from foundations, individuals or other sources and the processing of non-cash gifts of equipment and other items of use in Siena programs are coordinated through the Office of Development and External Affairs in consultation with OGFR. Gifts for research are contributions by donors, usually non-profit or for-profit organizations, to the College to fund scholarly activities and research. Typically, a gift for research is any item of value given by a donor who expects nothing of significant value in return, other than recognition and disposition of the gift in accordance with the donor's wishes. Funds for sponsored programs refer to research, instruction, and public service grants and contracts undertaken pursuant to a proposal submitted by the investigator that specifies the line of inquiry. Such arrangements require the prior approval of the College and the sponsoring agency and may be initiated in response to a sponsor's request for proposals, or may be submitted at the initiative of the investigator.

f. Indirect Cost Policy

The Federal Office of Management and Budget, OMB Circular A-21, Cost Principles for Educational Institutions (F.1), defines allowable direct and indirect costs for federal grants and contracts. *Direct costs* are those that can be specifically identified with the project, whereas *indirect cost* items are associated with general infrastructure support.

<u>Direct Costs</u>

Direct costs, as defined by the federal government, are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity; or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Typical direct costs are the compensation of faculty, administrators, staff, and students for work performed under the sponsored agreement, equipment acquisition and the costs of materials consumed or expended in the performance of the work.

<u>Indirect Costs</u>

Indirect costs are institutional expenses that cannot be readily and specifically identified with a particular project or activity, but contribute to the ability of the College to support research and instructional programs. Sometimes referred to as "overhead", these include costs of building maintenance, utilities, accounting and the other expenses necessary for the operation of the institution. Indirect costs stem from providing research space and administering the activities, not from the actual performance of the activities under the sponsored agreement.

For more information on *Indirect Cost Recovery/Overhead Distribution* policy, please refer to Exhibit A.

5. Post Award Administration

a. Award Receipt

The Office of Government and Foundation Relations seeks to help with any administrative questions that might pertain to a submitted proposal. Please provide OGFR with a copy of the funding decision, award letter or any other pertinent correspondence with a sponsor regarding the review process, funding decisions or a site visit, regardless of the timing of such correspondence. Awards are made to Siena College. The original notice of grant award, award letter, or contract for all activities should be provided to the OGFR immediately after it is received if the office has not already been the primary recipient. Also, please provide OGFR with a copy of or link to any of the sponsor's policies, as this will assist both OGFR and the Office of Finance and Administration with preparation for the ongoing management of the award.

(i) Proof of Award

Grants and contracts awarded to Siena College must be reviewed and accepted by OGFR. Terms and conditions associated with an award will be distributed, along with copies of the award, to the Assistant Comptroller and Director of Financial Compliance, to establish a sponsored account via Banner. The Office of Government and Foundation Relations accepts award letters, grant acknowledgements and contracts. Only the President and/or Vice President of Finance and Administration hold the right to sign off on any contract or award for the prime institution and/or sub-recipient. Unexpected or questionable terms and conditions will be discussed with the PI/PD and Dean prior to accepting the award. Awards that contain conditions unacceptable to the College may be returned.

Should the PI/PD receive the award letter and/or documents, the original documentation in its entirety should be sent promptly to the Office of Government and Foundation Relations with the PI retaining a complete copy. OGFR will review the award documents and distribute for account set-up.

In the event that a check arrives from a private funding source, OGFR will immediately contact the Office of Development and External Affairs for processing and stewardship.

(ii) Contract Negotiation

The Office of Government and Foundation Relations will work directly with the sponsor to negotiate language that is favorable to both parties, while protecting the rights and obligations of the College and the researchers involved in the endeavor. All research-related agreements, including but not limited to sponsored research agreements, research service agreements, material transfer agreements, nondisclosure agreements, industry-related agreements, grant awards and contracts are negotiated by the OGFR on behalf of Siena College and the PI/PD. Once both parties have reached a mutual agreement, the agreement is forwarded to the Siena College's Office of College Counsel for review since the document will contain clauses that often require special attention including confidentiality requirements, the right to publish findings, budget

limitations, required reports, record retention, patent and copyright protection, liability and indemnification. It is an absolute requirement, and in the principal investigator's and project director's best interests, that any and all contracts or agreements are thoroughly reviewed and negotiated. Further, such review and negotiation is required so that the contractual language is in accordance with the mission of Siena College and consistent with the College's adherence to the principles of academic freedom. A copy of the fully executed agreement will be maintained by the AVPAA and College Counsel.

(iii) Execution of Contracts and Agreements

The Vice President of Finance and Administration (VPFA) is designated as the Authorized Official Representative (AOR) for the college and signs all grants and contracts, whereas needed. To obtain a signature, a contract or grant must first be reviewed by OGFR who will then forward the documents to College Counsel for a final review. Grants are forwarded by OGFR to the Executive Secretary who will obtain the VPFA's signature, make a copy of the entire contract and/ or grant, and return the original to OGFR. A file will be established with the copy of the contract and/or grant, including the budget and any other correspondence, enclosed and forwarded to the Assistant Comptroller and Director of Financial Compliance..

As for subcontracts and subawards, such documents will be reviewed by OGFR and College Counsel, and once internally approved it is forwarded to the designated AOR for signature. The AOR is also responsible for endorsing any grant that requires matching commitments, subawards and contracts, and programmatic and/or budgetary modifications.

6. Establishing a Sponsored Funds Account

Upon procurement of a grant, OGFR requires an award letter along with a detailed budget justification (if available) from the funding agency prior to establishing an account. A copy of the official award letter including a detailed statement--in some cases, a budget layout--as to how the grants monies are to be spent needs to be furnished to the Office of Business Affairs in order to set up an account. The Assistant Comptroller and Director of Financial Compliance works closely with the Assistant Vice President of Finance/Comptroller to establish the approved grant budget. The Assistant Vice President will establish a Banner FOAPAL and set up permissions for Banner access to the appropriate department secretary. The Assistant Comptroller and Director of Financial Compliance will maintain the official file. All financial reporting related to external grants will be reviewed and prepared by the Assistant Comptroller and Director of Financial Compliance.

7. Indirect Costs Recovered Allocation

A PI/PD is entitled to receive a portion of the indirect costs, in the form of a budget allocation (to an account separate from the grant award) which will be based on 20% of the budgeted indirect costs for the College's *fiscal year*. The fiscal year time period is used, as it is consistent with the financial statement reporting requirements and the College's budget cycle. Refer to Exhibit A for further information.

a. Fiscal Year Distribution

Siena College's fiscal cycle runs from June 1 until May 31 on any given year. Often times the term of the grant award does not follow the College's fiscal year. Therefore in order to effectively administer the distribution of the indirect costs, each principal investigator/project director will be asked to provide the Assistant Comptroller and Director of Financial Compliance with an estimate of grant expenditures by fiscal year. This document will be used to calculate the fiscal year return of indirect costs.

If a grant is awarded during the middle of a fiscal year and the sponsor's funding period runs from January 1 to December 31, then the PI/PD will receive a portion of their indirect cost incentive from January 1 until May 31 of that year. The Assistant Comptroller and Director of Financial Compliance will then provide another estimate of grant expenditures to the Associate Comptroller and Financial Reporting & Analysis for the next fiscal year that begins June 1. This estimate should be prepared in consultation with OGFR prior to submission. An estimate of grant expenditures should be finalized at least 30 days before the fiscal year expires.

8. Budget Revisions & Transfers

If allowed, a PI/PD may request a revision to an approved grant budget. The request must be initiated by the PI. Budget revisions must comply with a federal agency's grant guidelines. A PI/PD must provide in writing a budget modification request along with justification to OGFR. OGFR Director will then consult with the Assistant Comptroller and Director of Financial Compliance regarding recent grant budget activities to ensure that the request is justifiable.

a. Budget Transfer

The College's financial reporting system (BANNER) does not allow the end users to perform budget transfers between grants, this provides for an added layer of security with regard to the misuse of grant funds.

Budget transfers within a grant are requested in writing and are directed to either the Director of Budget and Financial Reporting and Analysis or the Assistant Comptroller and Director of Financial Compliance. These individuals work together with regard to budget monitoring and compliance. The Assistant Comptroller and Director of Financial Compliance is charged with ensuring the transfers are in compliance with the specific grant and/or granting agency. Generally budget transfers require written consent from the granting agency. If a budget transfer is permitted the appropriate documentation is filed in the official grant file and the Director of Budget and Financial Reporting and Analysis updates the financial reporting system (BANNER).

b. PI Transfer to Another Institution

If a principal investigator anticipates leaving Siena College for another appointment, OGFR and the appropriate Dean should be notified immediately. If requesting a transfer of extramural

support to another institution, specific written approval must be obtained from Siena, the anticipated recipient institution, and the funding agency. If the principal investigator becomes unable to serve as the lead investigator on a grant and wishes to relinquish the grant, and nominate another Siena faculty member as the lead principal investigator, written permission from both Siena and the sponsor must be obtained. In all such cases, the Office of Government and Foundation Relations can provide assistance.

9. Equipment versus Non-equipment (Computers) Purchases

Siena retains ownership of or title to most capital equipment purchased with sponsored research funds. Equipment should not be sold, transferred, or otherwise disposed of without first notifying Office of Government and Foundation Relations. OGFR is responsible for researching and determining agency specific regulations governing the sale, transfer, or disposal of equipment purchased with sponsored research funds. Inventory of sponsored funds purchased equipment must be taken each year.

General guidelines concerning title to capital equipment permits full vesting upon close-out of the award under which the property was acquired. There may be special circumstances, such as the transfer of a PI or PD to another institution, when arrangements can be made to transfer property to another institution. In these situations written approval is required by both the awarding agency and Siena College, and may require reimbursement for the equipment. Arrangements should be coordinated through OGFR.

Non-equipment: Computers purchased from a public or private grant will be inventoried and receive an asset tag from ITS during the time that the students are enrolled at Siena to ensure that students will have the most up-to-date patches, virus upgrades and other cyber-security related products downloaded to their computers.

10. Budget and Expenditure Monitoring

The Colleges financial reporting system (BANNER) utilizes “dead stop” budget checking which electronically prohibits an invoice or check request from being processed if there are insufficient funds to cover the transaction.

Salaries related to a grant are not processed by Human Resources until the salary amount is approved by the Assistant Comptroller and Director of Financial Compliance or the Assistant Vice-President for Finance & Comptroller in consultation with OGFR Director. The approval process consists of verifying there are sufficient funds available from the grant budget, and that the work performed occurred within the period covered by the grant.

In addition to the above procedures, the Assistant Comptroller and Director of Financial Compliance, reviews grant activity on a monthly basis to ensure the costs are appropriate to the grant, properly accounted for and within the grant budget.

In the event that there is a cost overrun the additional costs are charged to the PI/PD’s departmental indirect cost allocation.

As added oversight, the Grant Monitoring Assistant/Secretary in the School of Science works closely with OGFR to monitor grant activities of PIs and Co-PIs in the sciences. The Secretary closely monitors expenditures on a monthly basis via Banner and is also responsible for processing purchase orders on equipment and supplies travel and check request, and student compensation request/adjustments (i.e., review and collect research student time sheets). Compensation review includes assurance that work performed was within the grant period, in accordance with the grant budget, the PI has approved (signed) the time sheet and time sheets are submitted in a timely manner.

11. Cost Transfers and Expenditure Reclassifications

A cost transfer is a shift of an expense to or from a sponsored project when that expense was previously charged elsewhere. Examples:

- transfer pre-award costs from a departmental fund
- correction of a clerical error
- reallocation of salary distribution to reflect actual effort

The cost allowability and allocability requirements of OMB Circular A-21 necessitate a thorough explanation and justification for any transfer of charges to federal awards from other federal, non-federal or University Funds. It is generally expected that all grant related expenses will be charged directly to the grant as the financial transaction is initiated. Allocability requirements do not allow transfers of costs from one project to another or from one competitive segment to the next solely to cover cost overruns. All federal and non-federal sponsors are sensitive to the risks associated with cost transfers and expect that they also be accomplished in a timely manner (typically within 90 days). The NIH policy on Cost Transfers, Overruns, and Accelerated and Delayed Expenditures found in the NIH Grants Policy Statement at http://grants1.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part5.htm#_Toc54600120 represents the perspective of all federal and most other sponsors.

We recognize that in certain circumstances it is more efficient to charge the PI/PD's departmental budget and transfer the grant related cost back to the grant. Examples of such transactions would be grant equipment that has a College Match component or PI/PD salaries when the grant supports a load reduction. Cost transfers are initiated by the Assistant Comptroller and Director of Financial Compliance, based on written verification from the PI/PD's department and/or Human Resources that a portion of the cost is related to grant activity.

a. Error Corrections

Occasionally processing errors may occur due to human error in applying account codes. These would be discovered during the monthly review performed by the Assistant Comptroller and Director of Financial Compliance. In those instances the Assistant Comptroller and Director of Financial Compliance would initiate the cost transfer and supply the supporting documentation. The transfers must be supported by documentation including a full explanation of how the error occurred and what steps will be taken to prevent the error in the future and a certification as to the correctness of the new charge by a responsible financial or administrative official of the department. Explanations that merely state the transfer are being made "to correct error" or "to transfer to correct project" is not sufficient.

b. Expenditure Approval

With the exception of faculty and student compensation (which requires OGFR authorization), all other request for payment and/or reimbursement on an approved grant are processed in accordance with the appropriate College policies.

The Assistant Comptroller and Director of Financial Compliance is responsible for reviewing grant expenditures to ensure compliance with the specific grant and granting agencies cost principles. Travel, contract (including subrecipient invoices) and payroll expenditures are reviewed prior to processing. Equipment, supplies and other related purchases are subject to the College's Purchasing Policy and are initially approved according to those policies. Travel expenses are also subject to the College's travel policy as well as any restrictions or regulations imposed by the granting agency. All subrecipient invoices must be signed off on by both the Assistant Comptroller and the PI. The PI's review indicates that the invoice is in line with the technical performance of the subrecipient. These purchases are reviewed by the Assistant Comptroller and Director of Financial Compliance, for grant compliance, as part of the monthly review process. Should any costs be deemed unallowable they would be transferred to another funding source at that time. All grant purchases are subject to compliance with the College's Purchasing Policy and Authority to Act Policy which are separate documents.

12. Independent Contracts

An independent contract is used only when a temporary service is provided on a grant and the individual and/or company is not affiliated with the college. All faculty and administrators must comply with the Authority to Act Policy. A partially-executed independent contract needs to be fully completed by both the Contractor and the Contractor's immediate supervisor prior to review. It is the responsibility of the PI/PD to initiate contract discussions and provide OGFR with a copy. Once completed, an independent contract with a completed W-9 Form should forward to OGFR and College Counsel for review unless other procedures have been adopted by the PI/PD and approved by OGFR. OGFR will then pre-screen and review each independent contract to ensure sufficient funds are available. Once pre-screened, OGFR will furnish a copy for review to College Counsel. Upon final review from College Counsel, the independent contract will be sent to AOR for signature. A fully-executed copy of the independent contract will be housed in the Office of Finance and Administration and OGFR. A copy is sent to Assistant Comptroller and Director of Financial Compliance for financial purposes (i.e., processing invoices). At the request of the immediate supervisor and Contractor, an electronic copy of the fully-executed contract will be furnished.

13. Subaward

A subaward is a formal written agreement made between Siena College and a Subrecipient organization to perform a portion of the Statement of Work under a Siena sponsored project. A subaward must include a clearly defined Statement of Work (SOW) to be performed by the Subrecipient. The Subrecipient's SOW is performed by its personnel, using its own facilities and resources. Work is usually performed at the Subrecipient's site. The Subrecipient takes full responsibility for adhering to the terms and conditions

of the subaward (including those that flow down from Siena's sponsor), and assumes creative and intellectual responsibility and leadership as well as financial management for performing and fulfilling the Subrecipient's SOW within the Subrecipient's approved budget.

a. Issuance of a Subaward

A subaward will not be issued, nor payments to a Subrecipient authorized, prior to Siena's receipt and acceptance of a funding commitment from the prime sponsor. A Siena PI/PD or designee may not authorize a Subrecipient to begin working without a fully executed subaward agreement in place. Proposed Subrecipients who commence work without a fully signed subaward agreement from OGFR do so at their own risk and have no assurance of payment from Siena College. In the event a subaward is subsequently issued to a Subrecipient, a Subrecipient may claim costs properly incurred under its own risk, provided that the costs are otherwise allowable. In such cases, the Subrecipient must furnish evidence to Siena College that all required compliance approvals were in place at the time the costs were incurred.

b. Revision to a New Subaward

If the Subrecipient's SOW or Budget has changed, updated information should be provided to OGFR; otherwise, OGFR will use the information contained in the proposal/award file. In addition, the following items must be on file before a subaward is issued:

- Copies of the Subrecipient's F&A and Fringe Benefit rate agreements
- Copies of the Subrecipient's human subjects approval and approval to use animals, if applicable
- A copy of the Subrecipient's most recent A-133 audit or link to its record on the Federal Audit Clearinghouse.
- Any special requirements the PI wishes to impose (prior approval requirements, report formats or due dates, etc.)

OGFR will consult with the PI/PD as needed to clarify requirements or to obtain additional information.

c. Subaward Period of Performance and Duration

The period of performance of a subaward (including any requested extensions) may not be outside of Siena's period of performance for a competitive segment under the prime award. Subawards may, however, be issued for shorter periods of time than Siena's full period of performance. A new subaward will be issued whenever Siena's sponsored project receives funding under a new competitive segment.

d. Modification and Amendment to Existing Subaward Agreements

Any approved grant that requires an amendment to the original proposal must be done in consultation with OGFR. An amendment is defined as a modification to the originally approved

grant proposal. An example of an amendment includes but is not limited to: budget modification, revisions to original grant objectives, performance period extension, change in personnel status, and budget transfer. Only a PI/PD can initiate a modification to an originally approved grant. Once an amendment request is submitted by the PI/PD to the OGFR Director in writing, the request is then reviewed. If the amendment requires a material change to an existing subaward or contract agreement, the OGFR Director will consult with College Counsel and other appropriate personnel in the Office of Finance and Administration prior to agreeing to any modification. Once a modification has been agreed upon by OGFR and the PI/PD that is in compliance with OMB Circular A-110 and Siena College campus-wide policy, the amendment is delivered to College Counsel for final review. Once College Counsel has completed the review of the proposed amendment and deemed ready for endorsement, the amendment is given to the designated Authorized Official (VPFA) for signature. Copies of the amendment are kept in hard copy and electronic format with the College Counsel, OGFR and Office of Business Affairs.

e. Closeout of Subawards

A Subaward is closed out when its period of performance comes to an end, regardless of whether Siena's research project is ending or continuing. When feasible, it is advisable for a subaward period of performance to be slightly shorter than Siena's, to allow sufficient time for collection and review of the Subrecipient's final reports, verification of subrecipient data, and incorporation of the Subrecipient's research results into Siena's final technical report to the sponsor.

(i) Final Technical Reports

PIs are responsible for obtaining final technical reports from their Subrecipients, and retaining a copy in their project file. PIs are encouraged to remind Subrecipients of this need well in advance of the due date for such reports.

(ii) Other Closeout Reports and Documents

Other final reports, including property reports and patent reports (if applicable), may be required. PIs and departments may be asked to assist OGFR in obtaining the necessary closeout reports in a timely manner from the Subrecipient.

(iii) Final Invoicing

In order for Siena College to comply with its financial report requirements, Subrecipients are required to submit a final invoice, clearly marked FINAL to Siena no later than 60 days after the end of the Subrecipient's period of performance, or such other date as may be specified in the Subaward. In the event no invoice is received 60 days after the end of a subaward, Siena may treat the Subrecipient's last invoice as the final invoice. Payment for Subrecipient invoices submitted to Siena later than 60 days after the end of the Subaward may not be paid. PIs and departments are responsible for assisting OGFR in obtaining final closeout information, including invoices, from their Subrecipients.

14. ARRA Funded Projects

All ARRA procured funds must adhere to the procurement policies previously stated in this document.. ARRA funds must be separately identified, reported and accounted for even if one grant/project contains both ARRA and non-ARRA funds.

All applications for ARRA funding are reviewed by the College Counsel, Assistant Vice-President for Government & Foundation Relations and Comptroller prior to entering into the grant agreement. Specific ARRA reporting requirements and concerns will be identified at this time and appropriate individuals will be notified prior to the signing of the agreement. The Vice-President for Finance & Administration signs the agreement.

When ARRA funds are awarded to the College, the AVP for Government & Foundation Relations notifies Assistant Comptroller and Director of Financial Compliance, Comptroller, principal investigator(s) and Dean of the PI's School that the College has received a grant that is fully or partially funded by ARRA. The notification process is similar to that of all other government grants except that the ARRA funding is specifically noted. The AVP for Government & Foundation Relations and the PI are responsible for ensuring compliance with all non-financial aspects of the ARRA regulations. All ARRA technical reports are due on the 10th on each of the following months: October, January, April and July. The Comptroller's Office, is responsible for financial compliance, with the Assistant Comptroller and Director of Financial Compliance and/or a designee being responsible for the compliance activities and review. In the case of ARRA funds being part of student financial aid funds, the Assistant Comptroller and Director of Financial Compliance will notify the AVP for Government & Foundations Relations, Comptroller and College Counsel of receipt of ARRA funds and which program they are related to. Please refer to the American Recovery and Reinvestment Act of 2009 Terms and Conditions (http://www.recovery.gov) for details regarding ARRA compliance.

The Comptroller's Office will maintain a list of all grants that are fully or partially funded by ARRA. To comply with this requirement the College establishes a separate "Fund" in the chart of accounts for each ARRA source of funding (similar to other gifts & grants) and the term ARRA is identified in the title. All sub-recipients must be notified that the award is or contains ARRA funds and they must separately identify those activities to the College. The Office of Government & Foundations Relations is the conduit for notification to the sub-recipients.

The College's financial statements and A-133 audit will separately identify the ARRA funds from other Grants. ARRA funds are separately reported at each calendar quarter end with the report being due no later than 10 days after the close of the quarter. Student financial aid related funds are reported by the Office of Financial Aid. All other ARRA grant funds are reported by the Office of Government and Foundation Relations. The Assistant Comptroller and Director of Financial Compliance provides the financial components of the reporting to each of these offices. Reporting site is www.FederalReporting.gov.

Note: These procedures are specific to ARRA. The ARRA grants are also subject to the College's Grant Policies and Procedures with regard to the general administration of the grant.

In addition, PIs are response for reporting programmatic information on a quarterly basis (January 5, April 5, July 5, October 5). This information is collected by the PI and provided to the OGFR Director by the 5th of each quarterly reporting period. The OGFR Director is responsible for reporting this data via Federalreporting.gov system. All ARRA funded subaward organizations are also responsible for reporting quarterly reports to OGFR. Enclosed is Attachment 4A, ARRA Reporting Requirements that is to be completed by the Grants Office of the subawardee.

15. Reporting Requirements

The Principal Investigator (or Project Director) is responsible for complying with all reporting requirements and deadlines, as specified by the sponsor. Therefore, PI/PDs should read the sponsor's guidelines carefully to ascertain what reports are required, their frequency, and preparation instructions. Formal financial reports will be prepared by the Office of Finance & Administration. This is in reference to any NSF Fastlane financial reports. I will delete the portion about at the request of the PI.

In addition, the Office of Finance and Administration submits quarterly expenditure reports to each granting agency along with a request for reimbursement of those expenditures.

16. Effort Certification

Siena faculty and staff who have either charged effort directly to a sponsored project or who have committed cost shared (contributed) effort to a sponsored project are required by federal regulations to verify and certify to such effort. Individual effort is expressed as a percentage of the total amount of time spent on work-related activities (research, instruction administration, etc.) for which the College compensates an individual. Effort must always equal 100%.

Payroll distributions and effort reports are not the same thing. Payroll distributions are the distribution of an individual's salary. Effort reports describe the allocation (percentage) of an individual's actual time and effort spent for specific projects. Time and effort on a project may not necessarily be reimbursed by the sponsor. Therefore, effort is a verification of both salary/payroll distributions as well as cost shared or contributed effort.

Cost-sharing represents the portion of costs that are not charged to the sponsor agreement but to the College or other third-party sources. Cost sharing commitments are made at the time of the proposal. If the proposal is awarded, the College is then obligated to meet those commitments ("committed cost share"). Federal regulations require that only committed cost shared effort be certified. Uncommitted cost sharing (effort that was spent on the project but was not included in the proposal or award) are not part of effort certification. Therefore, if there is academic and summer "allocations" listed under the "NSF funded person months" section of the proposal budget, whether there are dollars attached or not, effort should be reported.

To certify effort, an Effort Certification Form must be completed and signed. The College Policy requires that the Effort Certification forms be completed for the Summer, Fall and Spring terms. This will accommodate timely corrections to effort distributions/percentages.

The Effort Certification Form is to be populated by the Office of Business Affairs using payroll data from the Banner system for each PI and other employees of the College, who do not fill in a bi-weekly time card, who have provided effort to a sponsored project. The PI will review the effort certification form(s) for themselves and their employees and confirm that the percentages allocated for all time and effort is accurate. If necessary, the PI will need to make changes to the allocations for cost-share effort. The Effort Certification Form includes the employee name and identification number, their department, reporting period, the budget charged (foapal), the grant title, populated percentage of effort, actual effort (if different) notes or comments, and the total percentage of effort that was applied to each area of work related activities. The completed and signed forms are to be delivered to the Director of Financial Compliance.

Please remember that the Signed/certified effort reports are legal documents in which an individual attests to the accuracy of the effort charged to sponsored projects. One's signature indicates that one understands the basis for the certification.

17. Cost Sharing Policy

Funding agencies may require that the College contribute a portion of the total project costs. This may be accomplished as either cost sharing or matching. The terms cost sharing or matching is defined as that portion of a project or program costs not borne by the sponsor. Instead, that portion of a project or program is paid by the College. Per OMB Circular A-110, cost sharing and matching includes both cash and in-kind contributions that a recipient makes to an award.

- Cash contributions: The recipient's cash outlay, including the outlay of money contributed to the recipient by third parties.

- In-kind contributions: Non-cash contributions in the form of real property, equipment, supplies, and other expendable property, and the value of goods and services benefitting and specifically identifiable to the project or program.

Whether this cost sharing is mandated by the sponsor or volunteered by the recipient, the cost sharing becomes a College commitment and represents a binding obligation of the College once the award has been granted. Circular A-110 makes no distinction between cost sharing and matching. However, matching usually refers to the specific ratio between the amount of the award and the amount committed by the recipient, such as a dollar-for-dollar match or a 2-for-1 match. Cost sharing is a more general term and is used in this document to refer to both cost-sharing and matching.

For more information on the *Cost Sharing Policy*, please refer to Exhibit B.

18. Faculty Compensation on Sponsored Projects

This policy is intended to assure that the College's practices with respect to charging compensation to sponsored projects comply with applicable federal regulations, including the Office of Management and Budget Circular A-21 and granting agency requirements. Charging compensation to a sponsored project is allowable only to the extent that it complies with such requirements and with the College's policies.

Such compensation can take three forms: reimbursement of Academic Year Salary, Summer Salary, and Additional Compensation. Full-time faculty except for those appointed for only one term, are paid in 12 equal monthly installments.

For more information on this policy, please refer to Exhibit C.

Appendices

Exhibit A: Indirect Cost Recovery/Overhead Distribution Policy

Exhibit B: Cost Sharing Policy

Exhibit C: Policy on Charging Compensation to Sponsored Projects for Faculty

Exhibit D: Conflict of Interest Policy and Conflict of Interest Disclosure Form

I. Indirect Cost Recovery/Overhead Distribution

The Federal Office of Management and Budget, document OMB A-21, Cost Principles for Educational Institutions, defines allowable direct and indirect costs for federal grants and contracts. Direct costs are those that can be specifically identified with the project, whereas indirect cost items are associated with general infrastructure support.

A. What are Direct Costs?

Direct costs, as defined by the federal government, are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity; or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Typical direct costs are the compensation of faculty, administrators, staff, and students for work performed under the sponsored agreement, equipment acquisition and the costs of materials consumed or expended in the performance of the work.

B. What are Indirect Costs?

Indirect costs are institutional expenses that cannot be readily and specifically identified with a particular project or activity, but contribute to the ability of the College to support research and instructional programs. Sometimes referred to as "overhead", these include costs of building maintenance, utilities, accounting and the other expenses necessary for the operation of the institution. Indirect costs stem from providing research space and administering the activities, not from the actual performance of the activities under the sponsored agreement.

C. Indirect Cost Recovery

Indirect cost recovery (ICR) is the revenue received from a sponsoring agency, under the sponsored agreement, to pay a grant or contracts share to reimburse the College for the indirect costs it incurs in support of sponsored research. Within Siena College, indirect cost recoveries are unrestricted funds and are allocated at the discretion of the College. To serve as an incentive to stimulate sponsored research, a portion of these funds is allocated back to the School deans, departments and principal investigator to provide the infrastructure for additional contract and grant activity, as an investment in the continued ability of the departments to generate sponsored activities. It is important that Siena uses these funds to enhance the research and scholarship environment.

The Office of Finance and Administration in consultation with the three School deans, the Vice President of Academic Affairs and the Director of Sponsored Research have developed an ICR distribution plan that will provide monetary credit to participants involved in the development and procurement of a grant award.

1. Fifty percent of all indirect cost recovered from externally funded grants will be allocated to the College’s operational budget. These funds will be used at

the discretion of the College to cover various administrative and facilities expenses associated with the grant award.

2. The remaining 50% will be distributed in the following manner:

   a. The principal investigator's department will receive 20% of indirect costs recovered and allocated funds will be used to support departmental expenses at the discretion of department chair in consultation with the dean.

   b. The dean of the School will receive 10% of the indirect cost recovered to be used at his/her discretion to support the greater needs of the School.

   c. The remaining 20% of indirect costs recovered will be allocated, at the discretion of the principal investigator(s), to grant-related activities.

In the event that more than one principal investigator is involved in the project, whether as a co-author or co-principal investigator, credit will be established based on the level of contribution and responsibility (oversight) of the project. This determination will also have an effect on the each investigator's department. Both of these allocation issues will be handled on a case-by-case basis between the dean whose School receives the award and the department chairs and principal investigators (both PI and Co-PI).

It is important to note that multi-year, multi-investigator projects with significant personnel and student expenses may require additional grant administration on behalf of the College. Therefore, any faculty member with a large grant or a series of grants that generate in excess of $100,000 per year in indirect cost will need to be evaluated separately regarding ICR distribution. This process helps to ensure that the College has adequate financial support needed to successfully administer any post-award expenses related to the project (i.e., subaward agreements, A-133 audit).

The *Indirect Cost Recovery/Overhead Distribution* policy will be reviewed on an annual basis.

Approved: December 2004

Siena College
Cost Sharing Policy

Purpose

Funding agencies may require that the College contribute a portion of the total project costs. This may be accomplished as either cost sharing or matching. The terms cost sharing or matching is defined as that portion of a project or program costs not borne by the sponsor. Instead, that portion of a project or program is paid by the College. Per OMB Circular A-110, cost sharing and matching includes both cash and in-kind contributions that a recipient makes to an award.

- *Cash contributions*: The recipient's cash outlay, including the outlay of money contributed to the recipient by third parties.

- *In-kind contributions*: Non-cash contributions in the form of real property, equipment, supplies, and other expendable property, and the value of goods and services benefitting and specifically identifiable to the project or program.

Whether this cost sharing is mandated by the sponsor or volunteered by the recipient, the cost sharing becomes a College commitment and represents a binding obligation of the College once the award has been granted. Circular A-110 makes no distinction between cost sharing and matching. However, matching usually refers to the specific ratio between the amount of the award and the amount committed by the recipient, such as a dollar-for-dollar match or a 2-for-1 match. Cost sharing is a more general term and is used in this document to refer to both cost sharing and matching.

Types of Cost Sharing

There are two (2) types of cost sharing:

- **Mandatory Cost Sharing** – cost sharing required by the sponsor as a condition of the award.
- **Voluntary Cost Sharing –** cost sharing offered when no mandatory cost sharing requirements exist, or is in excess of mandatory cost sharing requirements.

Allowable Cost Sharing

Per OMB Circular A-110, cost sharing expenditures must satisfy all of the following criteria:

- Verifiable from the official College records;
- Not previously used as cost sharing for another project (the same cost sharing expenditures cannot be used for multiple projects);
- Necessary and reasonable for proper and efficient accomplishment of the project;
- Allowable under the terms of the award
- Conforms to other provisions of OMB Circular A-110, as applicable;

- Incurred during the effective dates of the grant or during the pre-award phase when authorized by the sponsor; and
- Not paid by the federal government under another award.

Unallowable Cost-Sharing

The following expenditures cannot be offered as cost sharing commitments in sponsored project proposals:

- Costs considered unallowable by the College or by the sponsor;
- Costs considered unallowable under OMB Circular A-21; and
- Salary amounts exceeding a regulatory salary cap.

Categories Associated with Cost Sharing

Faculty and Non-Faculty Effort

PIs are strongly encouraged to limit explicit commitments of contributed effort (i.e., effort at no cost to the sponsor) in sponsored project proposals, especially in those instances where contributed effort is not required by the sponsor or is not a significant portion of the PI's total effort. When it is appropriate to contribute faculty effort as a portion of a cost sharing commitment in a proposal, the College is obligated to that commitment of effort once the proposal is awarded. A certification of time commitment is required for the cost sharing effort as well as the effort charged to the award.

It may be appropriate to contribute non-faculty effort to the performance of a sponsored agreement. As with faculty effort, the commitment to provide such support binds the College to contribute the effort and record the associated expenditures, including fringe benefits. Likewise, certification of time commitment is required for the cost sharing effort of non-faculty effort as well as the effort charged to the award.

The total effort for research and other College activities performed by each individual must not exceed 100%. Existing commitments must therefore be taken into account when evaluating a proposed commitment of cost sharing, especially when multiple proposals are being submitted.

Calculation

When salary cost sharing is proposed, the cost shared amount must be calculated based on the individual's expenditure of effort and not on how the individual is paid by the College. This is particularly important to consider for faculty who are paid over a period of twelve months for a nine-month academic year salary. In order to calculate salary cost sharing for the purposes of submitting a proposal budget, the percentage of effort committed to the sponsored project or program is multiplied by the number of months of the individual's effort. The resulting person-month(s) is/are multiplied by the individual's College monthly rate of pay. In addition, the employee benefits must be included in the cost sharing calculation.

Examples:

a. 5% of a 9-month academic year appointment equals .45 (AY) person months (9 x .10 = .45)

   .45 months x monthly rate of pay (base salary ÷ 9) = salary cost sharing amount (plus benefits)

b. 10% of a 12-month calendar appointment equals 1.2 (CY) person months (12 x .10 = 1.2)

   1.2 months x monthly rate of pay (base salary ÷ 12) = salary cost sharing amount (plus benefits)

Equipment

Proposals which include the purchase of major, special-purpose equipment required for the exclusive use of the sponsored project or program may include an offer of College funds to pay for all or part of the cost of such equipment. The portion of the purchase price paid by the College must be charged directly to a cost sharing project grant in support of the award. PIs should not commit the use of existing equipment, whether College-owned or government-owned, as cost sharing.

Other Direct Costs

The following are examples of other direct costs that may be used as cost sharing: travel expenses, project materials, laboratory supplies, and sub-recipient cost sharing.

Facilities and Administrative (F&A) Costs

F&A costs, otherwise known as indirect costs, are real costs of conducting sponsored projects or programs. These costs are allocated to all activities in the College. Consequently, when direct costs are included in a cost sharing arrangement, the associated indirect costs should be included as part of the College cost sharing commitment.

Procedure Approval

This procedure outlines the College procedures required in order to comply with any category of cost sharing commitment as it pertains to sponsored programs.

Approval

The PI, with assistance and guidance from OGFR, is responsible for identifying all sources of funds and in-kind contributions for cost sharing of direct costs. The College generally expects that some portion of this expense will be provided by the PI and/or the Department Chair.

All proposed mandatory and voluntary cost-sharing arrangements must be approved by the responsible Department Chair and/or Dean and the VPFA before a proposal may be submitted to a sponsor by the Office of Government and Foundation Relations (OGFR). Depending on the cost-sharing arrangement,

other appropriate campus-wide officials may need to be consulted before final approval is granted by the VPFA. This policy also applies to in-kind contributions.

The PI should contact OGFR a minimum of 15 business days of the proposal deadline to discuss the specifics of the proposal and to determine the sources of funds and/or in-kind contributions to meet the cost sharing requirement. OGFR will discuss all voluntary and mandatory cost sharing commitments proposed by the PI with the appropriate parties, including final approval by the VPFA, before proposal submission.

Cost-Sharing Tracking and Recording

Once an award with a cost share component is granted, the Assistant Comptroller & Director of Financial Compliance (ACDFC) must be notified. At that time, the ACDFC, OGFR and the PI should meet to discuss the specific type of cost share expected from the award. Based on the results of that conversation, the Comptroller will then set up the appropriate Banner foapal(s) to track the cost share component of the grant.

If the cost share consists of a salary component, additional consultation with the Director of Budget and Human Resources will be needed. In order to track the cost share piece of a PI's salary, appropriate data needs to be entered into the Banner payroll system. This will help with accurate effort certification collection. For example, if there is academic and summer allocations listed under the "NSF funded person months" section of the proposal budget, but there are no amounts to be charged to the sponsored program, we need to track this in a separate account and effort should be reported.

If the cost share consists of expenses other than salary, these will need to be identified so that as the expense occurs they can be charged to a specific foapal for that purpose. These items should not be charged to an operating budget nor to the grant budget, but to a separate account set up for this purpose. Similarly, in-kind contributions also need to be identified as soon as possible so that they may be recorded appropriately.

Each grant awarded that has a cost share component will need to be reviewed on a case by case basis so that they can be tracked according to the agreement.

POLICY ON CHARGING COMPENSATION TO SPONSORED PROJECTS FOR FACULTY

Introduction

This policy is intended to assure that the College's practices with respect to charging compensation to sponsored projects comply with applicable federal regulations, including the Office of Management and Budget Circular A-21 and granting agency requirements. Charging compensation to a sponsored project is allowable only to the extent that it complies with such requirements and with the College's policies.

Such compensation can take three forms: reimbursement of Academic Year Salary, Summer Salary, and Additional Compensation. Full-time faculty except for those appointed for only one term, are paid in 12 equal monthly installments.

Academic Year Salary is compensation provided for service to the College during the regular academic terms, including but not limited to research, teaching, and administrative responsibilities.

Summer Salary is compensation provided for service completed during the summer for grant-related services.

Additional Compensation is compensation for extra services to the College, paid in addition to the Academic Year Salary. As set forth below, in rare circumstances, Additional Compensation may be charged to a sponsored project during the regular academic terms. Part-time faculty may also earn Additional Compensation from a sponsored project, but may only receive compensation during the summer months.

Whenever compensation is charged to a sponsored project, federal regulations require a certification that the compensation charged is reasonable in relation to the effort provided (the "effort certification"). Accordingly, all faculty who have compensation charged to a sponsored project must sign an Effort Certification Form. In addition, any employee reporting to the PI must have an Effort Certification Form signed.

Compensation funded by the National Science Foundation is limited to two months in total, regardless of the number of NSF-sponsored projects.

1. Academic Year Salary Reimbursement and Summer Salary

As set forth below, faculty may charge a portion of Academic Year Salary to sponsored projects ("Sponsored Academic Year Salary"). Faculty may also charge Summer Salary to sponsored projects ("Sponsored Summer Salary"). Part-time or visiting faculty may receive Sponsored Summer Salary. This is contingent upon an active faculty contract and permission of the respective dean.

During the regular academic terms, faculty typically engage in non-sponsored College activities, such as teaching, service on committees, advising students and other non-sponsored activities. These activities must be funded by the relevant school or department, and may not be charged to sponsored projects.

A. Sponsored Academic Year Salary

1. To the extent that faculty receive Sponsored Academic Year Salary, they must devote no less than the commensurate time during the Academic Year to the applicable Sponsored Project.

    - Sponsored Academic Year Salary is not Additional Compensation. It is Academic Year Salary, i.e., institutional base salary, which is funded by a Sponsored Project.

    - The rate for Sponsored Academic Year Salary is the same as the rate for non-sponsored academic year salary, and is computed based upon the number of months for which the Faculty member is appointed. For example, a Faculty member on a nine-month academic calendar who devotes one month of effort to a Sponsored Project during the Academic Year may charge one-ninth of his or her academic-year salary to the Sponsored Project.

    - Sponsored Academic Year Salary should be appropriately allocated to reflect work on the Sponsored Project. For example, if a faculty member plans to work on a Sponsored Project throughout the Academic Year, the commensurate Sponsored Academic Year Salary may be allocated across the academic year**.**

2. During the regular academic terms, faculty typically engage in non-sponsored College activities, such as teaching, service on committees, advising students and other non-sponsored activities. These activities must be funded by the relevant school or department, and may not be charged to sponsored projects.

B. Sponsored Summer Salary

1. Sponsored Summer Salary is paid as Additional Compensation during the summer.

2. Faculty who receive Sponsored Summer Salary must expend the associated effort during the summer. Effort expended during the academic year does not satisfy a commitment related to the receipt of Sponsored Summer Salary.

3. A faculty member may not receive Sponsored Summer Salary for activities other than Sponsored Research. That means that to the extent that a faculty member is engaged in non-sponsored University activities, (s)he may not be compensated for that work from sponsored projects.

4. The maximum amount of Sponsored Summer Salary permissible is three-ninths of the faculty's regular academic year salary (and in the case of NSF summer salary, that amount is limited to 2 summer months less any Academic Year Salary supported by NSF). In other words, in any year, a faculty member may receive no more than three months of Sponsored Summer Salary. Each month of Sponsored Summer Salary represents one month of full-time effort.

5. The rate for Summer Salary is the same as the rate for the regular academic year salary.

C. Academic Year Additional Compensation on Sponsored Projects

In unusual situations, faculty may earn Additional Compensation that is funded by a grant or contract during the regular academic terms. The following requirements apply to such Additional Compensation:

1. Additional Compensation is allowable subject to the regulations of the funding agency and the College's policies.

2. Additional Compensation included on a sponsored project budget must have the approval of the Dean and any other related-supervisor prior to grant submission.

3. In any grant application that requests Additional Compensation, the budget justification must state explicitly that the salary listed for the relevant faculty member represents Additional Compensation above the faculty member's base salary. In addition, prior approval for such Additional Compensation must be explicitly sought and obtained from the funding agency in accordance with agency requirements.

4. An award letter must explicitly state that grant funds are to be used for Additional Compensation for the faculty or a written statement from appropriate funding program office stating that funds may be used for Additional Compensation.

5. The requirements set forth in Paragraph C.4 also apply to any subsequent re-budgeting to pay Additional Compensation after the award is made. Where a sponsor's prior approval for such re-budgeting is not required, the Office of Government and Foundation Relations on will coordinate College approval.

SIENA COLLEGE

CONFLICT OF INTEREST AND COMMITTEMENT POLICY PERTAINING TO SPONSORED PROJECTS

SUMMARY: *This policy sets forth procedures and guidelines that are to be followed in resolving actual and potential conflicts of interest and commitment pertaining to sponsored projects. This policy applies to all sponsored projects including those funded by (A) commercial sponsors, (B) those federal agencies having specific conflict of interest requirements, and (C) purchase orders and subcontracts issued by Siena College under its sponsored projects irrespective of the source of funds.*

For the purposes of this policy, a potential conflict may fall under two separate categories: *Conflicts of Interest* or *Conflicts of Commitment*.

A **Conflict of Interest** occurs when there is a divergence between an investigator's private interests and his or her professional obligations to the College such that an independent observer might reasonably question whether the investigator's professional actions or decisions are determined by considerations of personal gain, financial or otherwise. A conflict of interest depends on the situation, and not on the character or actions of the investigator.

A **Conflict of Commitment** is defined as a situation in which an investigator's external activities interfere or appear to interfere with their paramount obligations to their students, colleagues, and the College.

The term "investigator" means the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by a sponsored agency.

The term family member includes your spouse, parents, grandparents, brothers and sisters (whether whole or half-blood), children (whether natural or adopted), grandchildren, great grandchildren, and spouses of brothers, sisters, children, grandchildren and great grandchildren.

In those circumstances in which the College is engaged in or intends to engage in a sponsored project with a commercial organization, or has subcontracted or intends to subcontract to an external organization under one of the College's sponsored projects, a conflict of interest may occur when a investigator's affiliation with the external organization meets any one of the following criteria:

1. The investigator is an officer, director, partner (general or limited), trustee, employee, advisory board member, agent or regular retained consultant of an external organization or corporation either funding a sponsored project or providing goods and services under a sponsored project on which the investigator is participating in any capacity.
2. The investigator is the actual or beneficial owner of any of the voting stock or controlling interest of such organization or corporation.

3. The investigator has dealings with such organization or corporation from which he or she derives income including dividends, interest and capital gains or losses.
4. The investigator's family member meets any of the criteria stated in 1-3 above.

Each investigator participating in a sponsored project covered by this policy must disclose whether or not he or she has external affiliations that may constitute a conflict by falling within the criteria stated in paragraphs 1-3 above. A disclosure must be completed prior to the College's acceptance of the sponsored project or issuance of a purchase order or subcontract for the acquisition of goods and services. The *Disclosure Statement Form* (Appendix A) is to be sent to the Office of Government and Foundation Relations via the investigator's department supervisor, chair or dean. Positive disclosures will be reviewed by the Assistant Vice President for Academic Affairs (AVP), the Vice President for Academic Affairs (VPAA), Assistant Vice President of Finance and Administration, and the College Counsel.

If an investigator discloses that a potential conflict exist, he or she must discuss with the appropriate College personnel listed above the proposed measures that will be taken to manage, reduce, or eliminate any actual or potential conflicts. In reviewing positive disclosures, College personnel will be guided by the following practices and apply them as may be appropriate:

1. Assure adherence to relevant College policies such as the External Grants Policies and Procedures Manual, the Faculty Handbook and other pertinent College documents deemed appropriate.
2. Consider the nature and extent of the financial interest in the relationship of the investigator member and the external organization.
3. Give special consideration to the terms and conditions of sponsored project agreements that may mitigate or complicate the given situation.
4. Consult with and obtain additional information from the investigator in resolving actual or potential conflicts.
5. Act in a timely manner so as not to delay unduly the conduct of the sponsored project.
6. Conclude that the College may take one of the following actions:

    a. Accept the sponsored project award.
    b. Do not accept the sponsored project award.
    c. Accept the sponsored project subject to suitable modifications in either the sponsored project award document or the external organizational affiliation(s) of the investigator or investigator's family member.

If the investigator is dissatisfied with the conclusion, he or she may appeal to the committee which includes the VPAA, College Counsel and Risk Officer who will consult with the investigator and other pertinent College officials as the committee deems necessary and appropriate to the particular circumstance. The decision of the committee shall be final.

Violations of this policy, such as willful concealment of financial interests, may result in sanctions being imposed upon the violating investigator. The Assistant Vice President for Academic Affairs in consultation with appropriate College officials will review allegations of violations and will make

recommendations regarding the imposition of sanctions to the VPAA. The decision of the VPAA with regard to the imposition of sanctions shall be final. In addition, the College shall follow Federal regulations regarding the notification of the sponsoring agency in the event the investigator has failed to comply with this policy. The sponsor may take its own action as it deems appropriate, including the suspension of funding for the investigator until the matter is fully resolved.

The Office of Government and Foundation Relations shall maintain the records pertaining to each disclosure in strict confidence. Records of disclosures and of actions taken to manage actual or potential conflicts shall be retained by the AVP until 3 years after termination or completion of a sponsored grant award. Access to such records will be limited to the investigator involved, the Assistant Vice President for Academic Affairs and the Vice President for Academic Affairs, and others who have a legal right to review the records.

As of August 24, 2012, for all PHS supported research, details of specific financial conflicts are required to be disclosed to any individual that requests this information.

Siena College

Disclosure Statement
Regarding External Affiliations

Name: _____

Title/Rank: _____

School/Department: _____

Title of Sponsored Project: _____

_____

Name of Funding Sponsor: _____

Project Period: _____

Important Note: <u>The Principal Investigator must also ensure that those who are responsible for, or in a position to influence, the design, conduct, or reporting of research or other scholarly activity will also complete and submit disclosures and updates in accordance with Conflict of Interest and Commitment Policy Pertaining to Sponsored Projects.</u>

A family member includes your spouse, parents, grandparents, brothers and sisters (whether whole or half-blood), children (whether natural or adopted), grandchildren, great grandchildren, and spouses of brothers, sisters, children, grandchildren and great grandchildren.

Please Respond by Inserting an "X" in the appropriate boxes:

Conflict of Interest:

1. Are you or any family member an officer, director, partner (general or limited), trustee, employee, advisory board member, agent or regularly retained consultant of (a) the external organization funding this Sponsored Project or (b) any external organization from which goods and services will be obtained under this Sponsored Project (including those to which you may be subcontracting a portion of the project work), (c) any external organization whose financial condition could benefit from the results of this Sponsored Project, or (d) any external organization having business dealings in an area related to the work under this Sponsored Project?

   ☐ Yes (if so, describe in detail the nature and extent of the association on an attached sheet).

   ☐ No

2. Are you or any immediate family member the actual or beneficial owner of any of the voting stock or controlling interest of (a) the external organization funding this Sponsored Project or (b) any external organization from which goods and services will be obtained under this Sponsored Project (including those to which you may be subcontracting a portion of the project work), (c) any external organization whose financial condition could benefit from the results of this Sponsored Project, or (d) any external organization having business dealings in an area related to the work under this Sponsored Project??

   ☐ Yes (if so, describe in detail the nature and extent of the equity interest on an attached sheet).

   ☐ No

3. Have you or any family member derived income within the past year, or do you or any family member anticipate deriving income from (a) the external organization funding this Sponsored Project or (b) any external organization from which goods and services will be obtained under this Sponsored Project (including those to which you may be subcontracting a portion of the project work), (c) any external organization whose financial condition could benefit from the results of this Sponsored Project, or (d) any external organization having business dealings in an area related to the work under this Sponsored Project? Do *not* include funds that would pay your university salary under the Sponsored Project budget. Do include dividends, interest and capital gains or losses.

   ☐ Yes (if so, describe on an attached page the amount of the income and the reason for which it was or will be derived).

   ☐ No

Conflict of Commitment:

1. Are you employed by or do you have any personal business affiliation with an external organization whose interests are related to this project?

   ☐ Yes (if so, describe on an attached page the name of the external organization, the time commitment of the employment or personal business affiliation, the nature of the business relationship, and the amount of compensation you derive from such employment or personal business affiliation).

   ☐ No

2. Do you have a personal business affiliation the scope of which covers identical or similar work that will be funded by a sponsored agreement to the university?

   ☐ Yes (if so, describe on an attached page the name of the external organization, the nature of the affiliation, the amount of time you dedicate or will dedicate to it, and the amount of compensation you derive from such employment or personal business affiliation).

   ☐ No

3. Have you involved or will you involve any student to assist you in the work covered by a personal business affiliation with an external organization?

   ☐ Yes

   ☐ No

4. Will any university resources, including facilities, personnel, equipment, or confidential information be used in an employment or personal business affiliation with an external organization identified in response to Question 1 above?

   ☐ Yes

   ☐ No

5. Does this project involve research with human participants?

   ☐ Yes (If so, please provide letter of approval by the Siena College Institutional Review Board)

   ☐ No

Certification: I have read and understand the Siena College Conflict of Interest and Commitment Policy pertaining to Sponsored Projects. I agree to submit a revised disclosure in the event that conditions change which would revise my response to any of the questions above.

Signature: _____ Date: _____

Print Name: _____

Dean/Department Chair

Signature: _____ Date: _____

Print Name: _____