# CEAT RESEARCH ADMINISTRATION SPONSORED PROJECT HANDBOOK



## **Table of Contents**

Introduction2
CEAT Research Administration – In Brief3
Applying for Sponsored Project Funding4
Project Budgeting: Allowable and Unallowable Costs5
Cost Sharing
The Routing Process10
Conflict of Interest
Research Compliance12
Export Controls
Developing & Monitoring Sub-recipient Relationships
Effort Reporting
Understanding Award Terms and Conditions
Technical Progress and Final Reports19
Intellectual Property
Appendix A21
Appendix B23
Appendix C25
Appendix D31
Appendix E

## Introduction

Conducting and administering academic research has grown more complex over the years. In addition to leading the research that is one of the core missions of Oklahoma State University, principal investigators have ultimate responsibility for compliance with both proposal and award terms and conditions, federal, state and local regulations, and university policies directly related to their research.

The goal of this handbook is to assist principal investigators and their departments with avoiding common pitfalls in research administration so they can receive the full value from their sponsored projects and focus on advancement of knowledge, development of the next generation of scholars, and service to the State of Oklahoma and the worldwide community.

Please note this handbook is for reference only and not intended as a replacement for the services provided by CEAT Research Administration and other campus units involved in the OSU research enterprise.

We hope the information in this handbook is helpful to you. If you have any questions, we can help! Just give us a call or send us an email.

Sincerely,

The CEAT Research Administration Team <a href="mailto:ceatresearch@okstate.edu">ceatresearch@okstate.edu</a>

## **CEAT Research Administration – In Brief**

CEAT Research Administration assists CEAT principal investigators with applying for and managing grants and contracts from external sponsors.

## **Proposals**

Proposal Development Specialists in CEAT Research Administration assist principal investigators with the process of developing, routing and submitting their proposals for external funding to all awarding agencies.

In addition to Proposal Development Specialists, CEAT Research Administration also has a full-time Proposal Editor and Writer on staff that assists CEAT principal investigators with fine-tuning their technical narratives prior to submission to the awarding agency.

The roles and responsibilities of principal investigators in the proposal development process are shown in Appendix A.

## **Awards**

Research administration coordinators in CEAT Research Administration assist principal investigators with the award set-up process after a proposal has been funded.

Research administration coordinators are also available throughout the life of an award for any questions related to the budgetary or regulatory aspects of a given sponsored project.

The roles and responsibilities of principal investigators in Award Set-Up and Award Management processes are shown in Appendix A.

Departmental assignments for the research administration coordinators in CEAT Research Administration are shown in Appendix B.

## Who to Contact

CEAT Research Administration 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

## **Applying for Sponsored Project Funding**

At Oklahoma State University, all awards must be made to the university, not to schools, colleges, programs or departments. No official application for sponsored project funding for research or any other sponsored activity, such as training, public service programs or special projects, may be made in the name of the university without prior approval of OSU's authorized official. At OSU, the president has delegated such authority to the Vice President for Research.

OSU employees that receive any part of their salary through the university, or whose activities use any university resources or facilities, must submit proposals for sponsored project funding through their designated college research office. In CEAT, this is the CEAT Research Administration office. Submitting proposals through CEAT Research Administration ensures that all sponsored projects conducted by CEAT employees, or with the use of university resources or facilities, have proper signature authority and comply with relevant university policies and guidelines. OSU has put this policy in place to protect faculty and the university.

CEAT Research Administration assists the CEAT research community in its efforts to secure sponsored project funding while promoting proper stewardship of those funds. When processing a proposal for sponsored project funds, CEAT Research Administration proposal development staff help principal investigators with preparing, routing and submitting their proposal to the sponsor to ensure the project complies with relevant university policies and guidelines. The proposal development staff in CEAT Research Administration is also available to assist with questions relating to university policy and proposal preparation.

## **Seeking Funding Opportunities**

CEAT Research Administration can assist principal investigators with seeking funding opportunities for their research.

Additionally, OSU University Research Services (OURS) provides resources for funding opportunities. The link for this website is: <a href="http://urs.okstate.edu/fundingopportunities">http://urs.okstate.edu/fundingopportunities</a>.

## **Submitting Early**

CEAT principal investigators are encouraged to contact the proposal development staff as early in the proposal development process as possible to help ensure proposals are submitted on time and in a compliant manner. The Proposal Development and Routing FAQ in Appendix C provides helpful tips about the proposal development and approval process so principal investigators can plan accordingly.

#### In short:

University policy requires submission of proposals for sponsored project funding through an authorized college sponsored programs office. In CEAT, this is CEAT Research Administration.

Sponsored project awards are made to Oklahoma State University.

## Who to Contact

CEAT Research Administration 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

#### Additional Information

OSU Policies & Procedures: University Research 4-0105 https://stillwater.sharepoint.oks tate.edu/Policies/Shared%20Do cuments/University%20Researc h.pdf

Other OSU Policies and Procedures related to Research can be found at: <a href="http://www.vpr.okstate.edu/research-policies">http://www.vpr.okstate.edu/research-policies</a>

## **Project Budgeting: Allowable and Unallowable Costs**

A <u>budget</u> is the financial expression of the technical narrative of a project. It lists the costs that are necessary to complete a project successfully. A <u>budget</u> justification is a narrative explanation of the costs listed in the budget.

When preparing a project budget, it is important to know what types of costs are typically allowable or unallowable on externally sponsored projects.

OSU and principal investigators are jointly responsible for budgeting sponsored research funds in compliance with federal cost principles established by the Office of Management & Budget (OMB). These principles are described in 2 Code of Federal Regulations Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," and incorporated into university policies and procedures for administering research awards. (2 CFR 200, also known as *Uniform Guidance*, took effect on December 26, 2014 and is in the process of being implemented in several phases.)

Adherence to all cost principles is critically important, both at the proposal budget development stage and award expenditure stage. OSU and the principal investigator should develop a project budget in a manner that will allow for proper and appropriate accounts for sponsored project funds when the proposal is awarded. The consequences of failing to comply with costing principles at the award stage may range from disallowance of specific incurred costs by the sponsor to termination of the award to federal sanctions, depending on the particular cost and circumstances in question.

## Allowable costs

The key concept of cost principles is "allowability." For a cost to be allowable on a specific sponsored award, it must be:

- Reasonable. It is necessary for the performance of the project and is within what a "prudent person" would pay for the particular goods or services obtained.
- Allocable. The project that pays the cost is the project that benefits from it. Expenses shared
  across multiple projects benefit all projects proportionately, when benefit can be clearly allocated,
  or reasonably, when proportionate value cannot be readily determined due to the interrelationship of the work involved.
- Consistently treated. The university consistently designates that type of cost as either direct or indirect when incurred for the same purpose in like circumstances.

Additionally, the cost must not be explicitly excluded by federal guidelines or the terms and conditions of the award. Some expenses that may directly benefit a project may be prohibited by the sponsor and, thus, not allowable on the resulting award.

Before budgeting any of the costs in the following categories, check the proposal solicitation terms and conditions and university policy to ensure that the expenses will be allowable when the award is made.

## **Proposal Preparation Costs**

Costs associated with preparing proposals and applications for sponsored project funding (including associated copying, mailing, long distance telephone charges, etc.) are not allowable.

## **Equipment**

The federal government and the university define equipment as "tangible, nonexpendable property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit (including tax, shipping and installation)." The threshold amount of \$5,000 is subject to change by the federal government and/or by the university.

Important considerations before budgeting equipment for a sponsored project:

## Allocability of Cost

If the equipment item will benefit more than one sponsored project or activity, only a portion of the equipment cost can be budgeted on the proposal. This portion must be allocable to the project proportionately, based on the benefit directly received. This also applies to cost shared equipment. See cost share section for further details.

## **Equipment Maintenance and Repair Costs**

Maintenance and repair costs to keep project-specific equipment -- whether existing or purchased with project funds -- in operating condition are allowable within the timeframe of the project performance period. If the maintenance agreement or repair cost benefits more than one sponsored agreement or activity, the cost must be allocable to the proposed project proportionately, based on the benefit directly received.

## Fabricated Equipment

Fabricated equipment is an item of capital equipment that has been constructed specifically for an OSU project, as opposed to being purchased "off the shelf" from a vendor or commercial supplier. Once constructed, the fabricated equipment must satisfy the federal definition of equipment, meaning it must have a total cost of \$5,000 or more, must be non-expendable and must have a useful life of one year or more. The fabricated equipment task in a project must result in a piece of equipment that is completed during the award period of the project. Each component of a fabricated equipment item must be budgeted specifically as *fabricated equipment*.

#### **Food**

The allowability of food expenses can be a source of confusion. Food is generally not allowable as a charge to a sponsored project. Depending on the type of project and its scope, food *might* be allowable, but it does require sponsor approval and must be fully explained in the budget justification.

#### Travel

Before charging travel to a sponsored project, principal investigators and their department administrators should review all relevant travel policies -- sponsor, program, federal, university and campus -- and note any special requirements such as pre-trip approval or prior approval to travel outside of the United States. It is especially important to review the Fly America Act, which restricts travelers to American Flag air carriers when traveling on federal funds unless exception criteria are met. Travelers should also be familiar with export control requirements when travelling internationally.

## **Memberships and Subscriptions**

Memberships and subscriptions are normally considered to be indirect costs because their benefit to research and academic endeavors generally cannot be specifically assigned to an individual project. If memberships are required for attendance at a professional technical meeting related to the funded project, the membership cost may be allowable provided it was specifically budgeted and justified in the project proposal.

## **Administrative/Clerical Salaries and Expenses**

General administrative or clerical salaries and expenses should be treated as indirect costs and not charged to the project. Depending on the project and its scope (e.g., a large center project) administrative salaries and expenses *might* be allowable, but it does require sponsor approval and must be fully explained in the budget justification.

## **General Purpose Office Supplies**

General purpose office supplies (e.g., papers, pens, toner cartridges, paper clips, etc.) are normally treated as indirect costs and included in the departmental administration component of the Facilities & Administrative rate (F&A rate, previously called the indirect cost rate). Depending on the project and its scope (e.g., outreach project requiring large mailings, brochures, newsletters, etc.), general purpose office supplies *might* be allowable, but it does require sponsor approval and must be fully explained in the budget justification.

## **Facilities and Office Rental Expenses**

These expenses are normally considered part of the indirect (F&A) costs.

Off-campus rental of facilities and/or office space for use in a project may be considered direct expenses if:

- 1. It is necessary to be away from regular office space for an extended period of time to work on the project in, for example, a field setting; and,
- 2. All tasks of the research project are carried out off-site including all data collection, analysis, and report writing; and,
- 3. The project has been approved by the university at the off-campus F&A rate.

## **Computers, Software and Computer Supplies**

Computing costs (computers, laptops, computer supplies and peripherals, office software) may be charged directly to federal grants under one of two conditions:

- 4. The computing device functions as a scientific instrument or is attached to such an instrument for data capture or experimental visualization; or,
- 5. When it can be clearly demonstrated that the computing device is necessary to accomplish the technical scope of the research outside the general purposes described below.

## General purpose computing

The following are considered general uses of computers and are normally not considered direct costs on federal grants: preparation and administration of federal grants, writing research reports, communicating with granting agencies or other scholars, teaching, or engaging in general scholarly productivity and communications. The federal government considers computers used in these ways to be covered by the F&A rate. Administrative computers would need to be justified following Uniform Guidance guidelines and OSU policies to be budgeted on a sponsored project.

## Justifying computer expenses

Great care must be taken to assure that computers and software required for scientific research are correctly budgeted. When budgeting computer equipment on a sponsored project, all the following criteria must be met:

- It must be specifically identified to and directly benefit the technical scope of the project.
- It must be included and justified in the project budget.
- It must meet the tests of allowability.
- It must not be disallowed by the sponsor.

If the same equipment and software are used for both research and general use, the cost must be distributed to all benefiting activities using a reasonable basis described by Uniform Guidance or in campus policy.

## **Cost Sharing**

Cost sharing is the portion of the project expenses borne by OSU and not by the sponsor. Shared costs are typically direct costs of the project. They may be paid from departmental, college or university funds. Other types of cost sharing include eligible expenditures from other grants or contracts or "inkind" contributions from "third party" industry partners and other sources.

There are three types of cost sharing:

- *Mandatory cost sharing*. Costs that the university must contribute toward the project in order for an award to be made.
- Voluntary cost sharing. Costs associated with a project and identified in the proposal, for which funding is not being requested from the sponsor.
- *Matching*. A requirement that grant funds be matched in some proportion by the grant recipient.

Cost sharing should only be offered when it is a condition of receiving an award. If cost-sharing is mandatory, this will be noted in the request for proposal (RFP) issued by the sponsor. The principal investigator is responsible for identifying resources for sharing direct costs at the time the proposal is being developed. CEAT Research Proposal Development Specialists will assist the principal investigator with obtaining approvals for cost sharing during the routing process.

Cost sharing must be disclosed to the sponsor in the proposal. Once an award is made, the cost sharing documented in the proposal becomes a binding commitment. Failure to fulfill the cost-sharing obligation may result in the reduction of the amount of the sponsor's award.

Per federal regulations, cost sharing commitments must be:

- Readily verifiable in the university's records and documented in writing, if provided by a third party;
- Necessary and reasonable to achieve the project objectives;
- Allowable under applicable cost principles;
- Not paid by another award, except as specifically authorized by the sponsor;
- Provided for in the approved budget when required by the sponsor; and
- Incurred within the performance period of the award.

## **Proposals**

Proposed cost sharing should be clearly documented in the proposal budget justification by the principal investigator.

Any normal university resources necessary for the project should not be offered as voluntary cost sharing and descriptions of such should be omitted from the proposal text.

#### In short:

Cost sharing is the project expense borne by CEAT/OSU or by a third-party.

Cost sharing should only be proposed when the award sponsor has specified costsharing as a condition of receiving the award.

Cost sharing typically covers direct costs paid from CEAT/OSU or third-party funds.

Failure to fulfill a proposed costsharing obligation may result in reduction of the sponsor's award.

The principal investigator is responsible for identifying the resources for cost-sharing of direct costs at the proposal stage. At the award stage, the principal investigator is responsible for ensuring that cost-sharing direct costs are expended appropriately.

#### Who to Contact

CEAT Research Administration 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

If deemed necessary, this type of information should be narrative in nature and must not include quantifiable financial information. Appendix D provides helpful examples of inappropriate language that, when included anywhere in a proposal, may invoke an unintentional cost sharing commitment.

CEAT Research will coordinate preparation of any letters of commitment pledging CEAT or OSU cost sharing. The letter will be signed by the Vice President for Research.

The principal investigator should obtain documentation from each third-party funding source that has promised to contribute cost sharing. Letters of commitment from third parties must be on the contributor's letterhead.

## **Awards**

Research administration coordinators in CEAT Research Administration are responsible for assigning cost share account numbers for departmental, college or university funds. They are also responsible for obtaining, tracking and reporting "in-kind" third-party cost share.

The principal investigator is responsible for ensuring that all cost-share contributions are expended correctly and that cost-sharing obligations are met in a timely manner.

It is important to notify your assigned research administration coordinator immediately if there is any possibility that a cost-sharing commitment will not be fulfilled. This includes situations in which a principal investigator transfers to another institution during the performance period of a project, because the sponsor may hold OSU responsible for fulfilling all, or a proportionate share, of any cost sharing commitment associated with the project.

#### Additional Information

OSU P&P 1-0113: Cost Sharing in Sponsored Research and Service Projects https://stillwater.sharepoint.okstate.edu/Policies/Shared%20Documents/Cost%20Sharing%20in%20Sponsored%20Research%20and%20Service%20Projects.pdf

## **The Routing Process**

The routing sheet is the internal document at OSU that facilitates administrative review and approval of all sponsored project proposals and awards.

A routing sheet must be completed and signed appropriately before submission of all sponsored projects proposals from OSU for external funding of any kind. This includes proposals submitted to sponsors either electronically or in hard copy by college sponsored research offices as well as departments across campus that are not affiliated with a college sponsored research office (e.g. Library, Upward Bound, Scholarships and Financial Aid, etc.).

If a proposal is awarded, the award must also be routed using the same number used on the proposal routing.

Each individual who signs a routing is assuring that the proposal or award is compliant with all university policies and procedures.

In CEAT, all routings are prepared and circulated by CEAT Research Administration personnel. The lead principal investigator for a proposal or award will be asked by CEAT Research to identify the appropriate Research Type (either Basic, Applied or Developmental) and complete Part 3 of the routing sheet. Part 3 of the routing sheet is designed to capture information needed to ensure compliance with Federal, State, and University requirements.

A copy of a routing sheet template and the OSU Routing Guidelines are located in Appendix E.

## In Short:

All proposals must be routed for university approval before they are submitted to the sponsor.

All awarded projects must also be routed for university approval before they are accepted.

Signing the routing sheet is an assurance that the proposal or award is compliant with policies and procedures.

CEAT Research Administration prepares and circulates all routings. The principal investigator must complete part 3 of the routing sheet and the Research Type.

## **Who to Contact**

Appropriate contact information will be provided with the routing package.

## Additional Information

OSU P&P 1-0305: Routing System – Proposals, Grants, Contracts and Agreements <a href="https://urs.okstate.edu/sites/default/files/RoutingPolicy5-10.pdf">https://urs.okstate.edu/sites/default/files/RoutingPolicy5-10.pdf</a>

## **Conflict of Interest**

A conflict of interest is a situation in which the conduct of research could be compromised, or appear to be compromised, by a related financial interest on the part of the Principal Investigator or other investigators. "Financial interest" is any personal benefit of significant monetary value, including, but not limited to:

- Salary or other payments received for services;
- Equity interests, such as stocks, stock options or other ownership interests;
- Intellectual property rights, such as patents, copyrights and royalties from such rights, other than royalties received through the university; or
- Appointment to a position as an officer, director, agent or employee of a business entity.

Because conflicts of interest can arise in the course of an individual's interactions outside OSU, the presence of an actual, apparent or perceived conflict of interest does not automatically constitute wrongdoing. However, any such potential conflicts of interest must be disclosed to the university and managed. OSU has a formal procedure for doing so in compliance with federal regulations.

CEAT investigators are required to:

- Complete the OSU Conflict of Interest Form annually, and submit it to the CEAT Associate Dean for Research. All Financial and Other Conflict of Interest forms can be found on the webpage <a href="http://compliance.okstate.edu/coi/forms-and-documents">http://compliance.okstate.edu/coi/forms-and-documents</a>.
- Check the appropriate boxes in the FCOI section of Part 3 on the routing sheet that pertain to that proposal.
- Provide updates as the amount or nature of interest changes during the period of performance of supported research.

Rules regarding conflict of interest apply to all investigators on a project. This process is intended to protect investigators, their sponsored research and other educational and professional activities in which they are engaged, and the university.

Principal investigators proposing Public Health Service research (whether OSU is the proposing institution or a subrecipient of PHS funds) must complete the PHS Financial Conflict of Interest (FCOI) form, in addition to the OSU Conflict of Interest form. PHS researchers must also complete a Conflict of Interest Web-based Training Course to meet PHS regulations. This training is required every four years.

#### In short:

Principal investigators and other investigators may not have, or appear to have, any personal financial interest in a research project.

University faculty, staff, managers or officials shall not engage in any activities where there is a conflict of interest between their official university duties and any other interest or obligation.

This policy applies to all investigators on a project.

Any potential conflict of interest must be disclosed to the department head and CEAT Associate Dean for Research before submitting a proposal.

## Who to Contact

Dr. Chuck Bunting CEAT Associate Dean for Research 201 ATRC

Phone: (405) 744-5957 Email: <u>adrbunting@okstate.edu</u>

## **Additional Information**

OSU Conflict of Interest Policy, Forms, and Online Training <a href="http://compliance.okstate.edu/coi/f">http://compliance.okstate.edu/coi/f</a> orms-and-documents

## **Research Compliance**

OSU is committed to fostering research opportunities and partnerships that lead to scholastic achievement, technological innovation, and economic revitalization. These opportunities and partnerships are guided and governed by ethical principles that are an integral component of the responsible conduct of research at OSU.

The Office of University Research Compliance (URC) administers key research compliance programs for the university, through which it promotes responsible conduct in research.

Through centralized coordination of administrative activities, education, and training, URC provides information and guidance in the areas of animal care and use, human subject research, biosafety, laser safety, and radiation safety. URC personnel are dedicated to assisting OSU faculty, researchers, students, and staff in complying with all regulations, statutes, and University policies governing the conduct of research and other scholarly activity.

## **Research Involving Human Subjects**

Federal regulations (Common Rule 45 CFR 46) and OSU policy require that the Institutional Review Board (IRB) review and approve all research involving human subjects before any human studies are begun. This includes projects related to the investigation of new drugs; medical, radiological, engineering, physiological, behavioral, sociological, and nutritional studies; projects involving human tissues or blood; as well as images, questionnaires, interviews, and other procedures.

All personnel who participate in studies involving human subjects must successfully complete an IRB training course. In addition, all studies approved by the IRB require continuing review. Failure to ensure that a project is reviewed/approved by IRB in a timely manner will lead to suspension of the project and any grants related to the study.

## **Research Involving Animals**

The OSU Institutional Animal Care and Use Committee (IACUC) must approve all teaching or testing that involves the use of vertebrate animals before the activities are performed. Any significant changes to an approved project must be approved by the IACUC in advance of implementation. The IACUC can assist principal investigators in complying with all applicable federal, state, local and institutional regulations regarding animal care and use. An approved Animal Care and Use Protocol must be in place before research involving animals is begun.

## **Biosafety**

OSU Institutional Biosafety Committee (IBC) approval is required for any activity involving recombinant DNA or biohazardous agents or materials, before the materials may be

#### In short:

The University Research Compliance provides information and guidance to principal investigators in the areas of animal care and use, human subject research, biosafety, laser safety, and radiation safety.

The URC assists OSU faculty, researchers, students, and staff in complying with all regulations, statutes, and University policies governing the conduct of research and other scholarly activity.

OSU requires formal training in Responsible Conduct of Research (RCR) for faculty, students (graduate and undergraduate) postdoctoral fellows and associates who are involved in research, regardless of source of funding.

Investigation into allegations of scientific misconduct are reported to and coordinated through the Vice President for Research.

### Who to Contact

University Research Compliance 223 Scott Hall Phone: (405) 744-1676 rdiana@okstate.edu

Human Subjects Research
Dawnett Watkins, CIP
IRB Manager
223 Scott Hall
Phone: (405) 744-5700

Phone: (405) 744-5700 <u>dawnett.watkins@okstate.edu</u> **Who to Contact, cont'd**  acquired and before the research activity is begun. If the project involves the use of animals, IACUC approval, which is contingent on IBC approval, is also required. Human gene transfer projects require IRB approval, which is contingent on IBC approval. The specific types of research that require IBC review are listed on the biological safety website.

## **Radiological Safety**

Authorization is required prior to use of radioactive materials and radiation-producing (x-ray) machines. The Radiation Safety Officer (RSO) and/or the Radiation Safety Committee (RSC) must approve usage, as appropriate. In some cases, the RSC may need to review and approve not only material or equipment, but also a particular proposed use.

The RSO assists principal investigators in complying with all applicable regulations and use authorization requirements.

## **Laser Safety**

OSU policy requires faculty, staff, students, post docs, visiting scientists, or other personnel planning to use Class 3b and/or Class 4 lasers to obtain prior approval from OSU's Laser Safety Officer. Training and laboratory inspections are prerequisites to this approval. OSU's Laser Safety Officer conducts laboratory inspections.

## **Responsible Conduct of Research**

OSU has an obligation to take steps to ensure that its advanced degree recipients, faculty, and research staff have a thorough working knowledge of matters related to responsible research behaviors. At a minimum, these include: proper citation of other work, plagiarism, research misconduct, intellectual property and copyright, falsification and unwarranted editing of data, conflict of interest, authorship on manuscripts, and mentor-mentee relationships. Other issues (e.g., ethical treatment of animals, human subject protocols, and handling of hazardous materials) may also be appropriate, depending on the discipline of study.

OSU requires formal training in Responsible Conduct of Research (RCR) for faculty, students (graduate and undergraduate) postdoctoral fellows and associates who are involved in research, regardless of source of funding.

Complaints of scientific misconduct directed at members of the OSU community may be made directly to the Vice President for Research (VPR) or may be referred to the VPR by the appropriate unit administrator. The VPR coordinates investigation of research misconduct and ensures that investigation reports are submitted to the federal Office of Research Integrity in a timely manner. Animal Use
Patrick Kehres, CPIA
IACUC Manager
220 Scott Hall
Phone: (405) 744-3592

iacuc@okstate.edu

Biosafety Mindy James, PhD Biological Safety Officer 223 Scott Hall Phone: (405) 744-3203 mindymc@okstate.edu

Radiation Safety
Brandi Simmons
Radiation Safety Officer
211 Scott Hall
Phone: (405) 744-7890
brandi.simmons@okstate.edu

Laser Safety
Brandi Simmons
Laser Safety Officer
211 Scott Hall
Phone: (405) 744-7890
brandi.simmons@okstate.edu

Responsible Conduct of Research rcr.ethics@okstate.edu

## **Additional Information**

Policies, Procedures, Forms, and Online Training <a href="http://compliance.okstate.edu/">http://compliance.okstate.edu/</a>

## **Export Controls**

OSU is committed to complying with all export control laws and regulations. It is important for principal investigators to understand how these requirements apply to them and their work at the university.

The Export Administration Regulations (EAR) overseen by the Department of Commerce and the International Traffic in Arms Regulations (ITAR) overseen by the Department of State are the primary regulations pertaining to export controls. The Treasury Department's Office of Foreign Assets Control (OFAC) also has authority over some areas that impact export control issues and there are numerous Executive Orders that reference export controls. Recently, the EAR and ITAR have undergone major revisions, many of which are still on-going.

If a principal investigator's research efforts are specifically in areas involving ITAR-related technologies, which are inherently military in nature, they should know OSU is currently not registered with the Department of State, Directorate of Defense Trade Controls, and at this time, there are no plans to be registered. Therefore, if a principal investigator is planning to pursue research funding on ITAR-related technologies, they must discuss this with their college sponsored projects office and the OSU Export Control Officer well in advance of the preparation and submission of any proposals.

It is unlawful to send or take export-controlled technology out of the U.S. or to disclose, orally or visually, or transfer export-controlled technology to foreign nationals inside or outside U.S. territory, without government approval. Technology is defined as "specific information necessary for the development, production or use of a product." This applies to tangible technology such as field equipment, computers, smart phones, etc. that a principal investigator may carry with them or ship abroad for their professional use.

Understanding the laws and regulations and how they apply can be confusing. Each item and/or project should be considered independently of others. Principal investigators are encouraged to familiarize themselves with the resources available.

## In Short:

U.S. export control regulations govern shipment, transmission, or transfer of certain sensitive items, information or software to non-U.S. persons (foreign persons or entities).

Restricted matter shared with foreign persons or entities within the U.S. is "deemed" to be exported. Therefore, export controls may apply to restricted items, information or software sent outside U.S. borders or shared with foreign persons or entities within the U.S.

Basic and applied research conducted at an institution of higher learning in the U.S. is normally exempted from export controls through the Fundamental Research Exemption.

## Who to Contact

Principal Investigator's Assigned Research Administration Coordinator 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

Jada Bruner-Gailey Director, Export Compliance University Research Services 206 Whitehurst Hall

Phone: (405) 744-9995 Email: jada.gailey@okstate.edu

## **Additional Information**

OSU Export Control Information, Policies and Procedures <a href="http://urs.okstate.edu/exportco">http://urs.okstate.edu/exportco</a> <a href="http://urs.okstate.edu/exportco">ntrolresources</a>

## **Developing & Monitoring Sub-recipient Relationships**

As the prime recipient of a grant, OSU may collaborate with other institutions, known as sub-recipients, who carry out a portion of the project. Sub-recipients can receive funding in the form of a sub-award from the prime award.

It is important to determine at the proposal stage whether the relationship with an outside provider will be considered a sub-award or a vendor procurement transaction. Therefore, before developing a proposal, the principal investigator should discuss any necessary outside providers with the Proposal Development Specialist.

If the relationship is appropriately characterized as a subrecipient relationship, only the first \$25,000 of a sub-award's expenses is subject to the OSU Facilities and Administrative charge (F&A charge) when the indirect cost base is modified total direct costs (MTDC).

When a sponsored project is funded, the CEAT Research Administration award administration unit is responsible for negotiating sub-awards and issuing them to the recipient institution or organization.

Sub-recipients must comply with all terms and conditions of the prime award. The principal investigator is responsible for monitoring the sub-recipient for compliance with award terms and conditions and for satisfactory performance of their portion of the project, including the completeness and acceptability of work performed, reasonableness of expenditures, and fulfillment of cost-sharing commitments.

Sub-awards are monitored using one, or a combination of, the following mechanisms:

- *Reporting*: principal investigator reviews performance reports submitted by the sub-recipient.
- Contact: principal investigator has regular contact with sub-recipients about program activities and progress.
- *Invoice review*: Invoices are received and reviewed by the assigned research administration coordinator. Invoices are approved by the principal investigator and processed for payment by departmental administrators. If an invoice is not approved, the research administration coordinator assists in resolution.

## In short:

Sub-recipients are collaborating institutions that participate in carrying out a portion of a project and receive funding as a sub-award from the prime award.

Before submitting a proposal, determine whether the relationship with an outside provider is a sub-award or vendor relationship.

The terms and conditions governing the relationship will differ depending on whether the provider is a sub-recipient or a vendor.

Only the first \$25,000 of a subaward expense is subject to the OSU F&A charge when the indirect cost base is modified total direct costs.

## Who to Contact

Proposal Development Specialist CEAT Research Administration 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

Principal Investigator's Assigned Research Administration Coordinator 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

## **Effort Reporting**

Effort reporting is the federally mandated process by which the salary charged to a sponsored project is certified as being reasonable in relation to the effort expended on the project. It applies to all sponsored projects.

Effort reporting involves the documentation of time spent by any employee funded by and working on a sponsored project. Effort reporting is the process used to substantiate all salary costs, either directly charged to sponsored projects or committed as cost-sharing. Effort is expressed as a percentage of the total amount of time spent on all work-related activities for which the university compensates the individual. If cost-sharing applies -- whether mandatory or voluntary -- OSU is required to track the cost-shared effort and certify that the campus has satisfied its commitment to the project.

## **Certifying Effort**

An effort report must be certified for each employee whose salary (or portion thereof) is charged to a sponsored project and/or for any employee who has cost-sharing commitments on the project.

Principal investigators certify their own effort. The principal investigator must also certify effort for other employees. The certifier must have firsthand knowledge of the work performed and the amount of effort expended on that project.

At OSU, effort reporting and certification is conducted monthly. In CEAT, a PI's departmental time and effort coordinator handles monthly time and effort certification.

#### In short:

Effort reporting is required on all sponsored projects.

Those who certify effort must have firsthand knowledge of the work performed and the amount of effort expended on the project.

Monthly time and effort certification is coordinated by staff in the Principal Investigator's department.

#### Who to Contact

Principal Investigator's
Departmental Time and Effort
Coordinator

#### **Additional Information**

OSU P&P 3-0321: Time and Effort Confirmation https://stillwater.sharepoint.okstate.edu/Policies/Shared%20Documents/Monthly%20Time%20and%20Effort%20Confirmation%20In%20Compliance%20with%20MB%20Circular%20A-21.pdf

## **Understanding Award Terms and Conditions**

It is critical to understand all funding source requirements and restrictions. If the terms of an individual award are stricter than federal guidelines and university policy, they take precedence. For example, travel expenses are allowable under either, but may be specifically excluded or limited by your specific award.

At time of award, the principal investigator's assigned research administration coordinator will provide a summary of important terms and conditions to assist with award management.

Some important terms and conditions to be considered when managing an award include:

## Budget

The principal investigator works with their department administrator to manage their project budget. The budget must be managed in accordance with allowable costing principles. As the project progresses, the grant budget should be compared to actual expenditures on a regular basis.

Modest re-budgeting of funds may be allowable without prior approval of the sponsor. The award terms and conditions should be consulted before re-budgeting to ensure that prior approval is not required. Re-budgeting of more than 25 percent may represent a change of scope and require preapproval from the sponsor. Significant re-budgeting of key personnel effort indicates a change in scope that requires preapproval from the sponsor.

When prior approvals from the sponsor are needed for rebudgeting, changes in scope or in personnel, CEAT Research will submit the prior approval request to the sponsor on behalf of the principal investigator.

## Performance period

Expenses (including cost sharing) must be incurred during the performance period of the award to be allowable.

#### Pre-approvals

Some agencies require pre-approval for certain types of expenses. For example, foreign travel may require sponsor approval as might the carry-forward of unspent funds remaining at the end of a budget period.

## Pre-award spending

Spending prior to receipt of an award is generally discouraged. However, there are situations where funding is delayed when the project is ready to commence. In these situations, principal investigators are encouraged to discuss their options with their department head.

### In short:

The terms of an individual award do not take precedence over federal guidelines and university policy unless they are more restrictive.

The principal investigator and department administrator must each thoroughly understand what the agency expects in managing the project. These are spelled out, in detail, in the award terms and conditions.

CEAT Research Administration assists principal investigators with award management by providing a summary of important award terms and conditions when the award is accepted.

Costs disallowed by the Office of Management & Budget (OMB) or the university are never allowable, regardless of the award terms.

Every award should be reviewed for specific restrictions such as re-budgeting and unallowable expenses.

## Who to Contact

Principal Investigator's Departmental Financial Administrator

Principal Investigator's Assigned Research Administration Coordinator 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

## Post-award spending

Expenses incurred after the end of an award period are not allowable. If you have reason to believe you will not be able to complete a project by the end date of the project period, a request for a no cost extension should be submitted to the sponsor, through CEAT Research. The award agreement may indicate a specific timeframe for submission of the no-cost extension, and you must meet that timeline or the request may be denied.

## Program income

Program income is defined as gross income, earned by an award recipient that is directly generated by a supported activity or earned as a result of the award. Examples of program income include fees from services performed or registration fees for conferences sponsored by an award. Most federal agencies identify the method for accounting for program income in the award agreement or have regulations that address the default method for accounting for program income.

If program income is anticipated as part of a proposed project, it should be disclosed in the project proposal. If program income arises during the life of the award that was not anticipated at the proposal stage, the principal investigator's department administrator and CEAT Research must be notified so that the proper method to account for the income can be established. All program income and related expenses must be reported to the sponsor agency along with the award financial activity.

## **Additional Information**

2 CFR 200 - Uniform Administration Requirements, Cost Principals and Audit Requirements http://www.ecfr.gov/cgibin/textidx?tpl=/ecfrbrowse/Title02/2cfr 200 main 02.tpl

## **Technical Progress and Final Reports**

Required reports include:

## **Technical Reports**

The principal investigator is responsible for submitting all required technical reports to the sponsor, with a copy provided to the assigned CEAT research administration coordinator. Report content requirements are spelled out in the award terms and conditions.

## Financial Reports

OSU Grants and Contracts Financial Administration (GCFA) is responsible for preparing financial reports required by the Sponsor. In most instances, GCFA also submits the financial reports to the sponsor.

## Final Invention Reports

Final invention reports are completed by GCFA with assistance from the principal investigator. GCFA is also responsible for submitting final invention reports to the sponsor.

The report describes any new technology developed with support from the award, whether or not it has been disclosed to the OSU Technology Development Center.

## **Equipment Inventory Report**

The OSU Office of Asset Management prepares and submits equipment inventory reports which detail all materiel and equipment acquired under the award that has been identified and tagged.

#### In short:

Complete and accurate technical reporting per the reporting schedule associated with each award is the principal investigator's responsibility.

Sponsors can and do suspend funding in cases where progress or final reports are not submitted in a timely fashion.

Check the sponsor's report formatting requirements and adjust your submission timing based on those requirements. Copies of reports, or report transmittal letters, should be forwarded to your CEAT Research Coordinator.

CEAT Research accepts reports electronically via email.

## Who to Contact

Principal Investigator's Assigned Research Administration Coordinator 201 ATRC

Phone: (405) 744-5957 ceatresearch@okstate.edu

## **Additional Information**

2 CFR 200 - Uniform Administration Requirements, Cost Principals and Audit Requirements http://www.ecfr.gov/cgibin/textidx?tpl=/ecfrbrowse/Title02/2cfr 200 main 02.tpl

## **Intellectual Property**

The Technology Development Center (TDC) at OSU assists faculty and staff members, administrators, and students with intellectual property issues resulting from their scholarly and creative activities. It exists to foster the creation of innovative technologies and to manage those technologies and other intellectual property for the benefit of the University and the public.

The TDC is responsible for managing the intellectual property assets of the University. In carrying out this mission, the purpose of the TDC is to:

- Assist faculty, staff, and students with the invention\* disclosure process
- Review disclosures with inventors to learn about potential applications
- Perform technical and market assessments to evaluate the commercial prospects of an invention
- Work with patent counsel to assess patentability and to provide appropriate legal protection
- Recruit prospective licensees
- Negotiate licensing agreements
- Disburse royalty fees to colleges, departments, and inventors
- Advise inventors regarding germane policies and procedures, including conflict of interest
- Facilitate confidentiality agreements
- Review and assist with research collaboration agreements as needed
- Facilitate material transfer agreements for biological materials

\*NOTE: Use of the word "invention" above includes software, multimedia, etc. Although a copyright would be required rather than a patent, the process is largely the same.

#### In short:

The Technology Development Center (TDC) at OSU assists OSU employees with intellectual property issues resulting from their scholarly and creative activities.

Inventions developed during the course of a sponsored project must be disclosed to the TDC in a timely manner.

All license agreements for OSU intellectual property are handled through the TDC.

The TDC negotiates and processes all confidentiality agreements between OSU and external entities.

## Who to Contact

Dr. Steve Price
Associate Vice President for
Technology Development
and Director of the Technology
Development Center
1201 South Innovation Way Dr.
Suite 210
Stillwater, OK 74074
Phone: (405) 744-6930

Cindy Malayer, Manager Technology Development Center Phone: (405) 744-5361 cindy.malayer@okstate.edu

## **Additional Information**

steven.price@okstate.edu

OSU Intellectual Property Information, Policies and Procedures http://tdc.okstate.edu/

# Appendix A

Sponsored Project Processes Responsibility Chart

# CEAT RESEARCH ADMINISTRATION SPONSORED PROJECT PROCESSES – RESPONSIBILITY CHART

## **PROPOSAL DEVELOPMENT**

ACTIVITY	RESPONSIBLE PARTY
<ol> <li>Review funding opportunity to:         <ul> <li>a. Identify submission requirements</li> <li>b. Identify special concerns (e.g. cost share, export control)</li> </ul> </li> </ol>	PI, Proposal Development Specialist & Proposal Editor
<ol><li>Submit Proposal Request Form to CEAT Research (<u>ceatresearch@okstate.edu</u>)</li></ol>	PI
<ul> <li>3. Establish internal deadlines for:</li> <li>a. Routing proposal for university approval</li> <li>b. Collection of final proposal documents</li> <li>from PI for submission to Sponsor</li> </ul>	Proposal Development Specialist
<ol> <li>Prepare and circulate routing package</li> <li>a. Minimum: budget, budget justification, draft SOW and any agency documents</li> </ol>	Proposal Development Specialist & PI
<ol><li>Develop final proposal narrative and supplemental documents</li></ol>	PI & Proposal Editor
<ol><li>Complete proposal application and submit final proposal to Sponsor</li></ol>	Proposal Development Specialist

## **AWARD SET-UP**

ACTIVITY	RESPONSIBLE PARTY
Receive award notification	Research Administration Coordinator (sometimes PI)
Review award document     a. Consult with PI	Research Administration Coordinator
b. Identify any special concerns	
3. Negotiate award - including subawards OUT	Research Administration Coordinator
4. Route award	Research Administration Coordinator
5. Obtain account numbers (including cost share)	Research Administration Coordinator
6. Distribute account numbers and award info	Research Administration Coordinator

## **AWARD MANAGEMENT**

ACTIVITY	RESPONSIBLE PARTY
1. Monitor expenditures - including cost share	PI & Department
2. Certify time & effort	PI & Department
3. Ensure compliance with award requirements	PI
4. Submit technical reports to Sponsor	PI
5. Obtain prior approvals from Sponsor	Research Administration Coordinator
6. Submit invoices and financial reports	Grants & Contracts Financial Administration (GCFA)

## Appendix B

CEAT Research Administration

Research Administration Coordinator

Departmental Assignments

# CEAT Research Administration Research Administration Coordinator Departmental Assignments (as of 10/18/17)\*

Department/Center Name	Dept/Center Acronym	Research Administration Coordinator			
Architecture	ARCH	Mitzi Riggs, x46562			
Chemical Engineering	CHE	Jennifer Clausing, x49499			
Civil & Environmental Engineering	CIVEN	Mitzi Riggs, x46562			
Center for Local Government Technology	CLGT	Jennifer Clausing, x49499			
Outreach-Professional Development	Prof. Dev.	Mitzi Riggs, x46562			
Outreach-Distance Education	Dist. Ed	Mitzi Riggs, x46562			
Electrical Engineering	ECEN	Mitzi Riggs, x46562			
Fire Protection Publications	FPP	Mitzi Riggs, x46562			
Fire Service Training	FST	Mitzi Riggs, x46562			
Industrial Engineering and Management	IEM	Mitzi Riggs, x46562			
Mechanical & Aerospace Engineering	MAE	Jennifer Clausing, x49499			
Materials Science and Engineering	MSE	Jennifer Clausing, x49499			
New Product Development Center	NPDC	Jennifer Clausing, x49499			
Southern Plains Transportation Center	SPTC	Mitzi Riggs, x46562			
Division of Engineering Technology	TECH	Jennifer Clausing, x49499			
Unmanned Systems Research Institute	USRI	Alex Legrant, x49500			
NASA OK Space Grant Consortium	NSGC	Alex Legrant, x49500			

<sup>\*</sup> Subject to change

# Appendix C

**CEAT Proposal Development and Routing FAQ** 

## **Proposal Development and Routing Process**

## **CEAT RESEARCH ADMINISTRATION**

## Frequently Asked Questions (FAQ) for CEAT Researchers

This FAQ is designed to provide CEAT researchers with proposal development and routing guidance. If you have any questions that are not addressed here, please contact ceatresearch@okstate.edu for assistance.

## Q. I'm thinking about submitting a proposal. Who do I need to contact?

A. Your first step is completing a Proposal Request Form. This form is located at <a href="https://ceat.okstate.edu/pre-award-services">https://ceat.okstate.edu/pre-award-services</a>. Submit your completed Proposal Request Form to us at <a href="mailto:ceatresearch@okstate.edu">ceatresearch@okstate.edu</a>. Providing as much detail as possible will facilitate the proposal process.

Please submit the Proposal Request Form at least 14 working days before the proposal submission deadline.

## Q. What happens after I submit my Proposal Request Form?

- **A.** Using the information you provided on the Proposal Request Form, the assigned CEAT Proposal Development Specialist (PDS) will:
  - Review the proposal solicitation
  - Identify any special submission requirements or concerns
  - Develop a proposal budget for your review and input
  - Identify the proposal components you need to prepare and provide to CEAT Research Administration for the proposal submission
  - Set an internal timeline for routing the proposal and assembling the final proposal documents for submission to the sponsor
  - Make contact with your project collaborators (both internal and external) to obtain necessary proposal documents
  - Route the proposal for department, college, and university approval
  - Submit the final proposal to the sponsor on your behalf

## Q. What is the typical timeline for the proposal development and submission process?

**A.** <u>14</u> working days before submission deadline: PI submits Proposal Request Form to ceatresearch@okstate.edu

<u>7</u> working days before submission deadline: **FINAL** Routing Documents complete <u>2</u> days before submission deadline: PI submits final proposal components to assigned PDS.

The PDS completes the proposal requirements per the RFP and has the PI verify that the proposal is ready for submission. Upon PI final approval, the proposal is submitted to the sponsor by the PDS.

Proposals with cost share, multiple colleges/departments, and collaborators need more than 14 working days' notice, so please plan ahead!

If you can't meet these deadlines, we'll continue to work on your proposal, but only on an "as able" basis. In other words, if we don't have capacity to accommodate late proposals, we may not be able to submit them. Please don't jeopardize your hard work with a last-minute proposal request!!

- Q. The funding opportunity I'm interested in requires cost sharing. Do I really need to worry about cost-sharing at the proposal stage?
- **A. YES!** Required cost sharing share for any proposal <u>MUST</u> be approved by the CEAT Associate Dean for Research and (when applicable) by the Vice President for Research BEFORE a proposal can be routed and submitted to a sponsor.

Identifying and securing required cost share adds time to the proposal development process, so please plan ahead!

Voluntary cost share (i.e., cost share not required by the sponsor) is not permitted under OSU policy and should not be included in proposals.

- Q. What proposal documents are needed to get the routing process started?
- **A.** To route a proposal, the following items/documents are needed:
  - 1. FINAL proposal budget
  - 2. FINAL narrative proposal budget justification
  - 3. DRAFT Statement of Work (SOW) or Abstract
  - 4. Letter(s) of Commitment (if applicable)
  - 5. Subcontract documents (if applicable)
  - 6. Equipment quote(s) (if applicable)

Some funding agencies require a signature from an authorized institutional official on special forms. The assigned PDS will assist you with preparing these special forms and will obtain the required signatures.

- Q. How long does the routing process usually take?
- **A.** Generally, five (5) working days are needed to route a proposal for university approval

Proposals involving OSU-Tulsa faculty, other departments/colleges, or proposals that require review by campus administration offices (such as University Compliance), require additional routing time, so please plan ahead!

- Q. What happens if the routing isn't started on time?
- A. When a proposal is routed less than five (5) working days before the submission deadline, the proposal must be "RUSHed" or "walked-thru."

"RUSH" and "walk-thru" routings are inefficient, stressful for the people involved, and susceptible to mistakes. Moreover, they damage the college's good standing with the Vice President for Research office.

CEAT Research will route rush proposal requests on an "as able" basis, but on-time proposals will take priority. If we don't have capacity to accommodate a last-minute routing, we may not be able to submit your proposal. Please don't jeopardize your hard work with a last-minute proposal request!!

- Q. I'm planning to submit a subcontract proposal to another university/industrial sponsor/other entity? Do subcontract proposals need to be routed?
- **A. YES!** Subcontract proposals are treated like any other proposal. Submit a Proposal Request Form for your subcontract proposal at least 14 working days before the deadline established by the primary submitting organization to start the proposal development process.
- Q. I'm planning to submit a preproposal/white paper/concept paper/talking paper. Do these need to be routed?
- **A. DEPENDS.** If these documents are not being submitted in lieu of a formal proposal, and do not include a detailed budget, cost-sharing commitments, or otherwise bind the university, they may not need to be routed.

Contact <a href="mailto:ceatresearch@okstate.edu">ceatresearch@okstate.edu</a> any time you plan to submit one of these types of documents. We will help you determine if a routing is required. As with proposals, please contact us for assistance with these types of documents well-ahead of the submission deadline.

Q. Can I submit my preproposal/white paper/concept paper/talking paper/letter of Intent by myself, if it does not require a budget and does not have cost share and does not need authorized institutional approval?

**A. DEPENDS.** Some funding agencies require the institution to make these submissions. Contact ceatresearch@okstate.edu for guidance before submission.

## Q. How should I submit to a limited submission proposal?

**A.** Some funding programs accept a limited number of proposals from an institution. In these instances, University Research Services announces an internal competition to determine which proposal(s) will be submitted to the sponsor.

Typically, University Research Services will send an email call requesting letters of intent from principal investigators to assess the number of interested applicants, and then coordinate an internal competition.

Letters of intent for limited submissions should be sent to Jennifer Stephens (limitedsubmissions@okstate.edu) with cc: to ceatresearch@okstate.edu.

## Q. What is the difference between a letter of support and a letter of commitment?

A. Letters of support are similar to letters of recommendation for the principal investigator. Some funding programs require these types of letters. If the solicitation does not specifically require them, they should not be included in the application. Letters of support are signed by the individual making the recommendation.

Letters of commitment are a promise to provide resources (either from the university or other sources) to successfully complete a project. The resources committed in these letters should be verifiable and trackable if the project is funded. A letter of commitment is included in each subcontract proposal provided by the university to another organization. Letters of commitment are signed by the Vice President for Research.

# Q. The Request for Proposal requires a support letter from the university. How do I obtain this letter?

A. Required support letters are drafted by the principal investigator and reviewed by the Department Head. Pam Reynolds, CEAT Research Proposal Editor and Writer (x41401), is available to review these for content and grammar of each letter, if desired.

Once the letter is finalized, it will be included in the routing package for the Vice President for Research to sign. Any letter that pledges or commits Oklahoma State University resources is signed by the Vice President for Research.

Q. I don't have a username and password for the funding agency's application system. How do I set this up?

**A.** University Research Services is responsible for initiating usernames and passwords for most agency proposal application systems. Consult the appropriate agency user instructions at <a href="http://urs.okstate.edu/electronicresearchadministration">http://urs.okstate.edu/electronicresearchadministration</a>. If you do not find the funding entity you are looking for, email <a href="mailto:ceatresearch@okstate.edu">ceatresearch@okstate.edu</a> for assistance.

If you change your username and password for a proposal application system, please email <a href="mailto:ceatresearch@okstate.edu">ceatresearch@okstate.edu</a>. We can provide you more efficient customer service if we can directly access your proposal application.

We want your proposal to be successful. Please communicate your plan to submit a proposal to ceatresearch@okstate.edu early. We have the tools and expertise to make the proposal development and submission process as efficient and painless for you as possible!

# Appendix D

Avoiding Unintentional Cost Sharing

## **Avoiding Unintentional Cost Sharing**

(Courtesy of UC Berkeley Sponsored Programs Office)

Normally, cost sharing is stated in the budget. However, cost sharing commitments can be stated in the budget explanation or justification or in the text of the narrative. No matter where cost sharing commitments are found within the proposal, *statements of cost sharing commitment are legally binding on the institution should the proposal be funded, even when not required by the sponsor*.

By using language in proposals that cites percentage of time, salaries, or specific levels of support, principal investigators can commit to cost sharing, often unintentionally. In all instances where cost sharing is specified and quantified, the principal investigator and University are obligated to account for and track these commitments along with funds awarded by the sponsor.

## **Examples of Suggested Language**

The examples below may be used in proposals to address the issue of academic or programmatic contributions or support without creating a contractual and auditable commitment to cost sharing. Also below are examples of language not to use because doing so would constitute cost sharing.

## **GOOD EXAMPLES** (no cost sharing commitment):

- The College of Engineering, Architecture and Technology at Oklahoma State University fully supports the academic year salaries of Professors, Associate Professors, and Assistant Professors, but makes no specific commitment of time or salary to this particular project.
- Professor X will be providing expert advice and consultation to the project, as needed.
- The University demonstrates support to the project through the availability and expertise of the Project Director (or Principal Investigator).
- Professor X is Principal Investigator and requests 25% salary support for this project. She will provide additional support to the project, as needed.
- Professor X will direct all research activities associated with the project [specify...]
- Professor X will oversee [all aspects of] the project.
- Dr. Y will participate in the project at every stage [specify...]
- Professor X will provide scientific direction and supervision for the project [including...]
- Professor X will have significant involvement throughout the project. She will be providing expert advice and consultation on all aspects of the research.
- Dr. Y is Principal Investigator and requests 30% salary support to the project. He will provide additional support as needed.
- Professor X's laboratory is 800 square feet. She also has access to the departmental [equipment name] that is beneficial to the research.
- The University demonstrates support to the multistage project through the availability and expertise of the project director.

- Dr. Y will be integrally involved in the project. She will have access to equipment that will ensure the successful execution of the proposed research and she will see the data analysis and report writing through to completion.
- The PI will have access to additional resources, such as [equipment name], to ensure the successful execution of this scope of work
- No salary support is being requested for Professor X; however, she will provide intellectual direction for the project, will have direct and significant involvement throughout the project, and will co-author publications.

## **BAD EXAMPLES** (cost sharing commitment - do not use these examples!)

- As a faculty member at a state-supported institution of higher education, Dr. Y's salary is paid by the State of Oklahoma; she will devote 25% effort toward this project.
- The College of Engineering, Architecture and Technology at Oklahoma State University is highly supportive of this project and agrees to be responsible for the salary of the PI for its duration.
- Effort equivalent to \$xx,xxx in salary and benefits will be provided by the Professor X.
- Professor X will devote 20% of her time to the project at no cost to the sponsor.
- Dr. Y is Principal Investigator and will devote 40% effort (30% salary support requested) to the project.
- The department will purchase a [equipment name] (cost \$xx,xxx) for exclusive use in support of Professor X's project.
- The University demonstrates support and will contribute to the multistage project through partial salary for the project director.
- Dr. Y will contribute a week of field work and the time required for data analysis and report writing, and he will supply all equipment.
- The PI will be contributing funds from other sources for use of [equipment name] to ensure that this scope of work can be performed on the proposed budget.
- Professor X will provide intellectual direction of the project and coauthor publications. Her time (5% effort) will be contributed by the College.

# MORE BAD EXAMPLES: "Red Flag" Terms (can mean cost sharing commitment - do not use!)

- Cost sharing
- Sharing
- Matching
- In-kind
- Donate
- Commit % or \$
- Allocate % or \$
- Exclusive Use
- Volunteer
- Support at no cost
- Contribute

# Appendix E

Routing Sheet and Routing Guidelines

OKLAHOMA STAT Routing Sheet	E UNIVERSITY		Rec	quires Official Signature	# to be signed		Primary Ro —	outing# E	N-18-RS-
Part 1 Date			Red	quires Notarization			Other Routi	ng #'s	
Routing Action	Proposal New		Rec	quires Other Signature	Who				
Source of Funding	Federal		Prepare	ed by:	PH #		DATE NEED	DED BY	
Flow-Thru Funding Source		Begin Date			End [	Date			
Amount Requested \$		Project Title							
Amount Awarded \$		Sponsor Name					Reference #		
COA/FC#		Project #		CFDA #	Research Type:	: Applied	d 🔀 Basic 🔲 Develo	opmental Reso	the state of the s
Part 2 Financial Info	ormation (Attach documer	ntation as nec	essary.)	Part 3 Complian	ce Information	(PI must con	nplete all applicable qu	uestions.)	
Cost Share Details/ Documentation	Waived F&A Documentation	VPR Cost Sh Form	are	Human Subjects Animal Use	☐ No No		Expires on		
Is recovery of F&A limited:	No If "yes", % allow	wed:		Recombinant DNA	No		Expires on		
Amt & % F&A WAIVED \$	%			Infectious Agents, Toxir Prions	Is, No	<b>=</b>	Expires on		
Amt & % F&A RECEIVED \$	%			Radioactive Materials/ X-ray Devices	No	Yes	Approved	Appl#	
Is Subcontractor(s) request	ted: No If "yes", s	\$		Laser Safety Inspection (Class 3b & 4)	No No	Yes	Approved		
Equipment budgeted: Sp	oonsor\$O	SU \$		Hazardous Chemicals  Space is available for th	No No	Yes No	Submission Date of Che	mical Inventory List	 Rm#
GRA Tuition: Rate I	Used Amou	nt \$:		Are space alterations re	quested?	No	Yes		
Other F&A exempt costs:	No If "yes", \$:			Is this an SBIR/STTR proj Is there confidential info		Neither None	SBIR STTF		
Are there CAS exceptions:	No			Has Conf. Agreement/N	DA been signed	l? No	Pending	Yes Date Signed:	
COST SHARE: Is Cost Shar	ring required: No If	"yes", what % _		Has an MTA been signe	d?	No	Pending	Yes Date Signed:	
Third Party Cost Share:	No If "yes", \$:			Do you or will you have				No Yes [	Unknown
VPR Cost Share REQUESTED	No If "yes", a	ittach required f	orm	Have EAR/ITAR regs bee Will there be any foreign		No No	Yes Export Co Yes If "yes", where:	ontrol Review Form <i>F</i>	Attached
Total Direct Cost Share:	,es ,u	ara en regan eu r		Can this funding be link	ed back to EPSC	oR \$\$\$ - direc		lo Yes	
F&A on Direct Cost Share:				Does sponsor reference Will this project need re				lo Yes	
Sponsor Waived F&A:				Does this project involv	e homeland sec	urity? N	lo Yes Involves C	LASSIFIED informati	on: No Yes
TOTAL COST SHARE:				If "yes", explain:				г	
Cost Share FOAPAL # (s)				Financial Conflict of Inte		ate		dates/Changes?	No Yes  Certified for NIH
				Is OSU Faculty/A&P Ove		Yes If "yes'	,: Pending OK	Resolved	Certified for Nin
L				If "yes", APPROVED BY:					
Part 4 Comments & Special Information:	oosal.								
	natures acknowledge that th to the project are noted and								ional Investigators provals Attached
-									
Description of the second					D	.15			
Principal Investigator		Org. Code_	Date		Research Comp	pliance			Date
 Department Head			Date		Director of GCF	FA			Date
	huck Bunting		Date		Vice President	for Research			Date
Research Services Rece	eived	eived  GCF	A Receive	35 ed  □ VPR Received			Varior 1.0 (00.10)	Print Form	PAGE 1 of